



# FRESNO General Plan 2015-2023 Housing Element

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Development and Resource  
Management Department



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# Chapter One – Introduction

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The Housing Element provides the City of Fresno with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing for all community residents. The City of Fresno's Housing Element specifically intends to:

- Provide direction for future planning programs to ensure that sufficient consideration is given to housing goals and policies;
- Establish and portray community goals and policies relative to housing through the identification of existing, stated, and implicit goals, and the identification of housing needs and problems; and
- Establish and identify programs intended to implement and attain the community's goals and policies, taking into consideration the feasibility of those programs, and act as a meaningful guide to decision-makers considering housing-related issues.



Cedar Courts, completed in 2015



The primary focus of the Housing Element goals, policies, and programs will be limited to the city of Fresno and the areas annexed into the city within this Housing Element plan period. Other jurisdictions within the Fresno Clovis Metropolitan Area (FCMA), City of Clovis, and County of Fresno will be responsible for housing program development and implementation within their respective jurisdictions.

## **Community Context<sup>1</sup>**

The city of Fresno, located in the Central Valley, covers an area of 113 square miles. Most of the land uses surrounding the city are rural residential and agricultural in nature, although the city of Clovis is adjacent to the northeast edge of Fresno. With a 2010 population of 495,000, Fresno is the largest city in Fresno County and fifth largest in California.

Fresno was founded by the Central Pacific Railroad Company in 1872. In 1875, the Central California Colony was established south of Fresno and set the model for a system of development that was used throughout the San Joaquin Valley. Tracts of land were subdivided into 20- to 40-acre parcels, irrigated from a system of canals and often landscaped with boulevards of palms, eucalyptus or other drought-tolerant trees. By 1903, 48 separate colonies or tracts in Fresno County drew farmers and their families from Scandinavia and from across the United States.

Fresno became the county seat in 1874 and incorporated in 1885. By 1890, the population was over 10,000. The first streetcars were introduced in 1892, and streetcar suburbs soon followed. Unlike the early 1890s, when it was estimated that roughly 40 percent of the city's population lived southwest of Downtown, the dominant development pattern in the post-WWII era has been to extend to the north and to a lesser degree to the east. This development was partially spurred by the extended streetcar system, the rise of the automobile, relatively cheap and abundant supply of land, evolving retail trends, and federal programs that enabled people to purchase single-family homes. In 1957, a California Department of Highways plan called for construction of State Routes 99, 41, and 180 to form a freeway loop around Downtown, redirecting traffic around the city's core rather than through it. The construction of the freeway loop system has had a devastating impact on the Downtown and its surrounding neighborhoods. Formerly unified neighborhoods were cut in two by freeways without surface crossings. Facilitated by the freeways, development continued to stretch onto inexpensive land to the north and east, aiding the flight of people and businesses away from the center of the city.

Residential uses are the predominant land use in the city. Although agricultural uses continue to dominate much of the regional landscape, only 11 percent of the Planning Area (city limits plus sphere of influence) contains agriculture. The majority of the existing agriculture within the Planning Area is located in the southeast. The Fresno General Plan (adopted in 2014) emphasizes infill development and a revitalized central

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<sup>1</sup> Sources: City of Fresno General Plan and City of Fresno Website :  
[www.fresno.gov/Government/DepartmentDirectory/DARM/HistoricPreservation/History.htm](http://www.fresno.gov/Government/DepartmentDirectory/DARM/HistoricPreservation/History.htm)

core area as the primary activity center for Fresno and the region by locating substantial growth in the Downtown, and along the corridors leading to the Downtown. The General Plan allows for greater densities for infill and revitalization along major corridors and in Activity Centers, to support greater use of transit in Fresno.

## **State Housing Element Law and Intent**

The California Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the State's main housing goal. Recognizing the important part that local planning programs play in pursuit of this goal, the Legislature has mandated that all cities and counties prepare a Housing Element as part of their comprehensive general plans. The Housing Element, a mandatory general plan element, identifies ways in which the housing needs of existing and future residents can be met. State law requires that all cities adopt a housing element and describe in detail the necessary contents of the housing element. This Housing Element responds to those requirements, and responds specifically to conditions and policy directives unique to Fresno.

Section 65581 of the California Government Code reflects the legislative intent for mandating that each city and county prepare a housing element to:

- a. assure that counties and cities recognize their responsibilities in contributing to the attainment of the State housing goal;
- b. assure that counties and cities will prepare and implement housing elements which, along with federal and State programs, will move toward attainment of the state housing goals;
- c. recognize that each locality is best capable of determining what efforts are required by it to contribute to the attainment of the State housing goal, provided such a determination is compatible with the State housing goal and regional housing needs; and
- d. ensure that each local government cooperates with other local governments in order to address regional housing needs.

## **Scope and Content of the Housing Element**

This Housing Element covers the planning period of December 31, 2015 to December 31, 2023 and identifies strategies and programs to: 1) encourage the development of a variety of housing opportunities; 2) provide housing opportunities for persons of lower and moderate incomes; 3) address the quality of the existing housing stock in Fresno; 4) minimize governmental constraints; and 5) promote equal housing opportunities for all residents.

Toward these ends, this Housing Element consists of:

- An introduction of the scope and purpose of the Housing Element
- An analysis of the city's demographic and housing characteristics and trends including an analysis of existing and projected housing needs per the requirements of California Government Code Section 65583
- A review of potential market, governmental, and environmental constraints to meet the city's identified housing needs
- An evaluation of land, administrative, and financial resources available to address the housing goals
- A review of past accomplishments under the previous Housing Element
- A Housing Plan that includes housing goals, policies, and programs

## **Relationship to Other General Plan Elements**

The Fresno General Plan consists of the following elements:

- Economic Development and Fiscal Sustainability
- Urban Form, Land Use and Design
- Mobility and Transportation
- Parks, Open Space and Schools
- Public Utilities and Services
- Resource Conservation
- Historic Resources
- Noise and Safety
- Healthy Communities
- Housing Element Consistency
- Implementation

When any element of the General Plan is amended, the City will review the Housing Element and if necessary, prepare an amendment to ensure continued consistency among elements. State law requires that the Safety and Conservation Elements include an analysis and policies regarding flood hazard and management information upon revisions to the Housing Element. The City adopted a comprehensive General Plan update in December, 2014. Information on flood hazard and management is up to date. Moving forward, the City will ensure compliance with this requirement by reviewing its Safety and Conservation Elements upon future Housing Element revisions.

The Housing Element contains policies and programs that are consistent with policy directives in all other General Plan elements. Hazards, the natural environment, and infrastructure considerations discussed in detail in the General Plan relate specifically in the context of potential constraints to future residential development. Development policies contained in the Urban Form, Land Use and Design Element, which establishes the location, type, density, and distribution of local land uses, including housing, relate most directly to the Housing Element. The policies and priorities of the Housing Element and the Urban Form, Land Use and Design Element have been carefully balanced to maintain internal consistency.

The Fresno General Plan emphasizes increased land use intensity and mixed-use development at densities that will support greater use of transit in Fresno. The General Plan lays out the strategy to meet this challenge by directing growth to emerging mixed-use neighborhoods strategically located to provide opportunities for housing, jobs, transit, and amenities in cohesive districts. By integrating the housing strategy with its growth strategy, the City can promote economic development, put strategies in place to reduce housing costs, minimize environmental impacts, and enhance the quality of life. The establishment of mixed land uses in the Urban Form, Land Use and Design Element and implementing development standards in the 2015/2016 comprehensive update of the Fresno Development Code are key tools for implementing General Plan goals.

## **Public Participation**

In 2015, the City implemented a bilingual community outreach program to receive feedback during the drafting of the Housing Element. The outreach program included nine community workshops held in locations throughout the city. A summary of the community outreach process and results is included in Appendix A.

### **Community Workshops**

To obtain public input at the initial stages of the Housing Element update, nine community workshops were held at the dates, times, and locations indicated:

- Workshop #1 (October 19, 2015, 6:30 P.M.): Cooper Middle School Cafeteria, 2277 W. Belaire Way
- Workshop #2 (October 20, 2015, 6:30 P.M.): Teague Elementary School Cafeteria, 725 N. Polk Avenue
- Workshop #3 (October 21, 2015, 6:30 P.M.): Center for New Americans Training Room, 4879 E. Kings Canyon
- Workshop #4 (October 26, 2015, 6:30 P.M.): Duncan Polytechnical High School Cafeteria, 4330 E. Garland Avenue
- Workshop #5 (October 27, 2015, 6:30 P.M.): Ahwahnee Middle School Cafeteria, 1127 E. Escalon Avenue
- Workshop #6 (October 28, 2015, 6:30 P.M.): Mayfair Elementary School Cafeteria, 3305 E. Home Avenue
- Workshop #7 (October 29, 2015 at 6:30 P.M.): Figarden Elementary School, 6235 North Brawley Avenue
- Workshop #8 (November 2, 2015, 6:30 P.M.): Edison High School Cafeteria, 540 E. California Avenue
- Workshop #9 (November 3, 2015, 6:30 P.M.): Fancher Creek Elementary School Cafeteria, 5948 E. Tulare Avenue



*Participants at Meeting #6 at Mayfair Elementary*

At least one meeting was held in each Council District to provide access to all areas of the city, and an additional meeting was held at the Center for New Americans specifically to engage the Hmong community. With the exception of this meeting, which was held at a community center, all of the meetings were held at elementary, middle, and high schools in HUD-designated low-income census tract areas.

All workshops were held in English with simultaneous Spanish translation provided, with the exception of Workshop #3, where simultaneous Hmong translation was provided. Spanish and Hmong interpreters were present at all nine workshops. Agendas and comment cards were provided in multiple languages. Refreshments and children's activities were provided at all workshops to encourage participation by residents.



*Attendees at Meeting #9 at Fancher Creek Elementary*

### **Publicity**

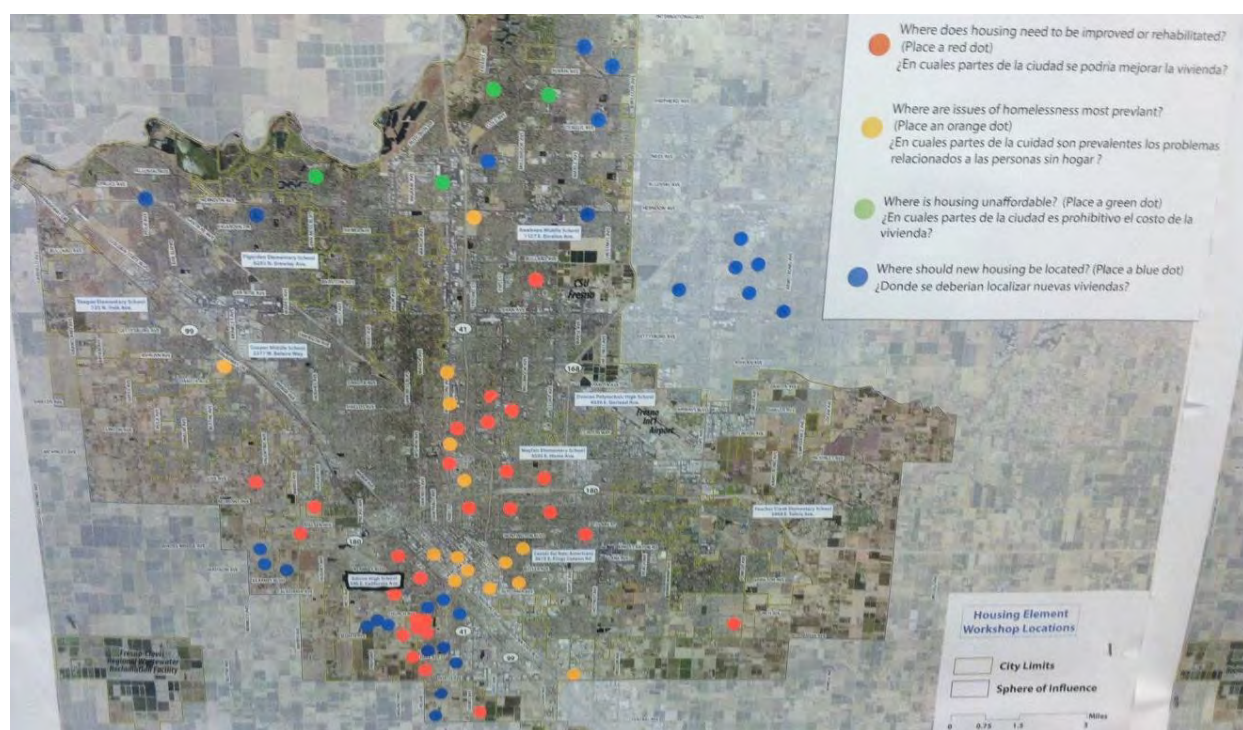
The City established a website page focused on the Housing Element update, including a summary of the process and workshop agenda, schedule, and presentation in



English, Spanish, and Hmong. A flyer with trilingual (English-Spanish-Hmong) information about the community workshops was also distributed via email to over 500 residents, housing advocates, community organizations, and members of local commissions and City Council. Also, printed copies were provided to all students at schools where the workshops were held. The workshop schedule was emailed in mid-October, 2015, and reminder emails were provided on three later dates.

Trilingual (English-Spanish-Hmong) display advertisements for the workshops were also included in the *Fresno Bee* weekday and Sunday editions announcing the Housing Element update process and schedule and providing contact information to obtain more information. At each community workshop, participants were welcomed and introduced to the Housing Element through an informative PowerPoint presentation. Following the presentation, participants were asked to place a colored dot on a map of the City of Fresno answer to the following questions:

- Where does housing need to be improved or rehabilitated?
- Where are issues of homelessness most prevalent?
- Where is housing unaffordable?
- Where should new housing go?



Example of completed "dot exercise" from one of the nine community workshops

Following the dot exercise, City staff and consultants led participants in a facilitated discussion. Approximately 140 comments and questions were received (see Appendix A for listing of comments). The following are key findings and themes from the workshops, as well as a response indicating how and where the concern is addressed in the Housing Element.

- Fresno needs more diverse housing types in closer proximity to one another, including %high end+ housing in some neighborhoods and modest/affordable housing in other neighborhoods, to provide choices in all neighborhoods.
  - Response: The General Plan and Development Code establish land use policy for Fresno focused on revitalizing existing neighborhoods, incentivizing infill development, and creating complete neighborhoods, among others. The Housing Element sites inventory shows that the distribution of residential sites at various densities is fairly evenly distributed throughout the city. See Chapter 3 and Tables 3-7 and Figures 3-1, 3-2 and 3-3 for more information about the geographic distribution and density of the sites inventory. The sites inventory, in combination with the programs proposed in Chapter 6, are designed to help the City provide more housing choice in all areas of Fresno.
- Fresno should focus resources on older neighborhoods to address abandoned homes and related crime, illegal dumping, and poorly maintained rental properties.
  - Response: See Chapter 6, Program 19 . Comprehensive Code Enforcement, Program 21 - Housing Rehabilitation, and Program 24 - Enhanced Police Service to High Crime Neighborhoods.
- Homelessness is perceived as a continuing problem that is geographically spreading to all areas of the city.
  - Response: See Chapter 6, Program 9 . Homeless Assistance. The MAP program and other City programs have been established to address this issue.
- More affordable housing is needed.
  - Response: See Chapter 6, Program 5 . Housing Funding Sources; Program 6 . Strengthening Partnerships with Affordable Housing Developers; Program 7 . Special Needs Housing; Program 8 . Home Buyer Assistance; and Program 9: Homeless Assistance.
- Housing access is limited when the only option to apply for housing or a related benefit is via computer since not everyone has access to a computer or is computer literate.
  - Response: See Chapter 6, Program 25 . Fair Housing Services

### **Public Meetings with the Council, Commissions and Committees**

During the Draft Housing Element public review period, which was January 7, 2016 through February 29, 2016, additional workshops/study sessions were held as described below.

City Council	January 14, 2016
Housing and Community Development Commission	January 27, 2016 February 10, 2016
Disability Advisory Commission	January 19, 2016 February 9, 2016
Planning Commission	February 3, 2016

These meetings were advertised in an outreach flyer and newspaper display ad, and were posted on the City's website in the Housing Element Page and City Clerk 72 hours prior to the meetings.

In addition, the following Council District Plan Implementation Committees and Design Review Committees reviewed the Public Draft on the dates noted below. The item was noticed through the public noticing requirements for these committees, which is agenda posting 72 hours prior to the meeting.

Council District 1 Plan Implementation Committee	January 19, 2016
Council District 2 Plan Implementation Committee	January 19, 2016 February 29, 2016
Council District 3 Plan Implementation Committee	January 25, 2016 February 22, 2016
Council District 4 Plan Implementation Committee	January 11, 2016 February 22, 2016
Council District 5 Plan Implementation Committee	January 11, 2016 February 22, 2016
Council District 6 Plan Implementation Committee	January 11, 2016 February 18, 2016
(Council District 7 does not have a committee)	
Fulton-Lowell Design Review Committee	January 11, 2016 February 19 2016

Tower District Design Review Committee:

January 15, 2016

The comments received at these meetings were addressed in this revised draft wherever feasible. The comments are described on the comment matrix in Appendix A.

### **Public Comment Letters**

Eight comment letters were received. The letters are included in the comment matrix described above, along with responses. The letters are also included in Appendix A.

### **Revised Public Draft Summary of Changes:**

This Revised Housing Element Draft has been updated to address as much of the public input on the draft as feasible. Specifically:

1. Chapter 1 (this chapter) was updated to include the public participation that occurred after the release of the first Housing Element Public Draft in January of 2016.
2. Chapter 2 was updated to include new information on various city programs as well as information provided by the Disability Advisory Commission on terminology, services and needs related to individuals with disabilities.
3. Chapter 3 was updated to include additional residential capacity in the sites inventory pursuant to Program 2.1.6A of the 2008 Housing Element and related description of the methodology.
4. Chapter 4 was revised to include clarifications to respond to comments about infrastructure and development requirements in Downtown.
5. Chapter 5 was revised to include clarifications, additional information about previous accomplishments, and Program updates.
6. Chapter 6 was revised to refine the proposed programs and add new programs to address concerns expressed by the public and stakeholders. Program descriptions and timelines were updated to better describe the details of the programs.

Members of the public who submitted comments on earlier drafts of the Housing Element and the general public were also invited to provide comments at three public hearings: Housing and Community Development Commission (March 23, 2016), Planning Commission (March 30, 2016), and City Council (April 14, 2016 and April 28, 2016).

### **2017 Amendment Workshops and Public Meetings**

The City of Fresno adopted the 2015-2023 Housing Element on April 28, 2016. The California Department of Housing and Community Development (HCD) reviewed the adopted Housing Element and provided the City with written comments through a letter received August 11, 2016 and updated on November 1, 2016. Subsequently, revisions to the Housing Element have been made. Specifically, the Land for Housing section (Chapter 3) was updated to revise the shortfall of adequate sites from the RHNA in the previous planning period (2008-2013). Several programs in the Housing Plan (Chapter 6) were also refined to provide more specific actions and timeframes for implementation. To receive input on the draft Housing Element Amendment, three additional workshops/study sessions were held. Two neighborhood workshops were held on December 6 and December 15, 2016. One was held at Cooper Academy Middle School and the second was at the Wesley United Methodist Church. A stakeholder workshop was held on December 14, 2016 at City Hall before the Housing and Community Development Commission. The Housing Element Amendment was available for public review for 30 days (December 13, 2016 . January 13, 2017).

Workshop notices were published in the *Fresno Bee* in three languages and in the *Vida en el Valle* weekly newspaper in Spanish. Additionally, the meeting flyer was distributed to eight schools in lower-income neighborhoods, emailed to 500 stakeholders, posted on the City's webpage ([www.fresno.gov/housingelement](http://www.fresno.gov/housingelement)) and social media page, posted at all Fresno public libraries. The City used local foreign language media (Hmong Radio and Radio Bilingue) to further advertise the workshops and encourage participation from local stakeholders. Information about the amendment was presented at the City's Housing & Community Development Commission, Planning Commission, and City Council.

Subsequent to local review and receipt of public comments, the Housing Element was further refined. The revised Amendment was reviewed at a February 1, 2017 Planning Commission Workshop and a February 8, 2017 Housing & Community Development Commission Workshop. Public hearings on the Housing Element Amendment are anticipated in April 2017.



## Chapter Two – Housing Needs, Population, Household and Unit Characteristics, and Regional Housing Needs Evaluation

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To best understand the types of housing that will be needed to meet future demand, Housing Element law (California Government Code Section 65583(a)(1) and 65583(a)(2) requires that this Housing Element assess population demographics and economic characteristics. Characteristics such as age, ethnicity, and employment influence the type and cost of housing needed or in high demand. Tracking changes in the demographics can also help City leaders better respond to or anticipate changing housing demand. This chapter also details the housing stock characteristics of Fresno to identify how well the current housing stock meets the needs of current and future city residents. The identified demographic patterns and trends will serve as the basis for crafting the City's housing policies and programs.



Bridges at Florence, completed in 2014

## Population Characteristics

Housing needs are influenced by population and employment trends. This section provides a summary of changes to the population size, age, and racial/ethnic composition of the City of Fresno using the benchmark year of 2000.

### Population Growth

The Department of Finance (DOF) provides population estimates for each jurisdiction, shown in Table 2-1. Analyzing population change can help assess where there may be a need for new housing and services. The county of Fresno had a total population of over 960,000 in 2014. More than half the countywide population resides in the city of Fresno (515,609). The countywide average annual growth was 1.3 percent between 2000 and 2014, compared to 0.9 percent statewide.

**Table 2-1: Change in Total Population (2000-2014)**

Jurisdiction	2000	2010	2011	2012	2013	2014	Total Change	Average Annual Growth
city of Fresno	427,719	494,665	497,560	503,825	508,453	515,609	87,890	1.3%
county of Fresno Total	799,407	930,450	936,089	943,493	952,166	964,040	164,633	1.3%

Source: Fresno Pre-Approved Data Package, State of California, Department of Finance, E-4 Population Estimates for Cities, Counties, and the State, 2011-2014, with 2010 Census Benchmark.

Table 2-2 identifies population by Council District as of April 2011 (total estimates for 2011 differ between Census and Department of Finance estimates).

**Table 2-2: Population by Council District**

Council District	Population
1	71,112
2	71,475
3	69,745
4	70,514
5	70,253
6	70,373
7	71,193
<b>Total*</b>	<b>494,665</b>

Source: 2010 U.S. Census and City of Fresno Development and Resource Management Department.

### Population Forecast

Based on San Joaquin Valley Demographic Forecasts developed for the eight San Joaquin Valley regional planning organizations, the county of Fresno's population is

anticipated to grow to 1,373,700 persons by the year 2040. This assumes an average annual growth rate of 1.8 percent between 2010 and 2040. In the past, county population has increased at rates of 2.4 percent a year from 1970 to 1990, and 1.7 percent a year from 1990 to 2010. During the next three decades (2010-2040) 443,229, or 48 percent, more people are expected to reside in the county of Fresno. It is anticipated that the city of Fresno will continue to receive approximately half of that growth, consistent with its population size and recent trends.

## Age

Age characteristics can influence housing needs. Typically, younger households look for more affordable rental opportunities as they begin their careers and accumulate wealth. As adults begin to form families, the demand increases for larger rentals or more affordable single-family homes that can accommodate children. The prime age group for entrance into the rental market is 20 to 29 and the primary age group for purchasing homes is 30 to 45. Demand for move-up housing is strongest as residents approach the peak earning years of 45. 64. As retirement approaches, seniors may wish to downsize into smaller units that are more easily maintained and accessible. Table 2-3 compares age group changes between 2000 and 2010 for the city and county.

Trends associated with the various age groups are summarized as follows:

- From 2000 to 2010, the Under 18, 18 to 29, and 30 to 61 age groups decreased slightly in the city and the Under 18 age group increased slightly in the county. The county also experienced a slight decrease in 18 to 29 and 30 to 61 age groups. Both the city and county show a significant increase in the 62 and Over age groups.
- The percentage of persons in the 30 to 61 age groups overall shows a significant increase from 2000 to the 2010 timeframe.

**Table 2-3: Population Age Characteristics 2000 – 2010**

Population	2000		2010	
	Number	%	Number	%
<b>city of Fresno</b>				
Under 18	140,791	32.9%	168,472	32.4%
18 - 29	82,926	19.4%	95,155	18.3%
30 - 61	157,751	36.8%	188,231	36.2%
62 and Over	46,184	10.8%	68,117	13.1%
Total	427,652	100%	519,975	100%
<b>county of Fresno</b>				
Under 18	256,425	32.1%	316,354	32.2%
18 - 29	144,899	18.1%	165,770	16.8%
30 - 61	304,795	38.1%	367,511	37.4%
62 and Over	93,287	11.7%	133,843	13.6%
Total	799,406	100%	983,478	100%

Source: U.S. Department of Commerce, Bureau of the Census, United States Census of Population . 2000 and 2010.

The median age within the city of Fresno in 2010 was 29.3 years, compared to 30.6 years for county of Fresno as a whole.

Certain historical factors continue to have an impact on the community's age structure. Persons born in the post World War II baby-boom (between 1956 and 1965) were in the 45 to 54 year old age group at the time of the 2010 Census and continue to create a bulge in the population pattern. Data for persons born prior to 1945 continues to be impacted by the depression-era birth rate decline. There appears to be a smaller bubble in the 18 to 29 year old category which would complement the baby-boomer bulge showing when those individuals started their own families.

The city of Fresno itself attracts a larger proportion of varying age groups than do suburban and rural portions of the county. The trends between 2000 and 2010 show a stable pattern with no distinct surges in any age group. The city also continues to expand on its educational and job opportunities to attract the young adult age group.

### Race/Ethnic Composition

Race and ethnic population is included as part of the population trends analysis required California Code Section 65583(a)(1). The nature and extent of a community's housing needs can be influenced by the racial/ethnic composition of its population. The size and type of housing preferred can vary based on many factors, including a household's racial or ethnic background. The local ethnic composition within the city and county shows distinct changes between 2000 and 2010. As shown in Table 2-4, Hispanic residents made up close to half of the city's population in 2010, a seven percent increase from 2000. This increase in the Hispanic population also occurred at the county level where, in 2010, Hispanic residents made up slightly more than half of the county's population.

**Table 2-4: Race and Ethnicity, 2000-2010**

Population	2000		2010	
	Number	%	Number	%
<b>city of Fresno</b>				
Hispanic	170,330	39.9%	232,055	46.9%
White (Not Hispanic)	158,199	37.0%	148,598	30.0%
Black	33,851	7.9%	37,885	7.7%
Asian/Pacific Islander	47,905	11.2%	61,602	12.5%
American Indian/Alaska Native	3,262	0.8%	3,127	0.6%
Other	13,677	3.2%	11,398	2.3%
Total Population	427,224	100.0%	494,665	100.0%

**Table 2-4: Race and Ethnicity, 2000-2010**

Population	2000		2010	
	Number	%	Number	%
<b>county of Fresno</b>				
Hispanic	352,205	44.1%	468,070	50.3%
White (Not Hispanic)	316,488	39.6%	304,522	32.7%
Black	39,659	5.0%	45,005	4.8%
Asian/Pacific Islander	63,074	7.9%	87,922	9.4%
American Indian/Alaska Native	6,394	0.8%	5,979	0.6%
Other	21,587	2.7%	18,952	2.0%
<b>Total Population</b>	<b>799,407</b>	<b>100.0%</b>	<b>930,450</b>	<b>100%</b>

Source: U.S. Census Bureau, 2000 and 2010 Census.

In 1990, the Hispanic population in the city was almost 30 percent; by 2000 it had grown to almost 40 percent, and by 2010 grew to almost 47 percent. By 2020, the county projections indicate that the Hispanic population will comprise a greater percentage of the total population than any other race group. Demographic forecasts for the eight counties in the San Joaquin Valley indicate that a sizeable out-migration of the white non-Hispanic population and an even large increase in the Hispanic population is expected. In both the city and county, the Black population has remained relatively consistent and is expected to decrease slightly going into 2020. The Black population within the county is predominantly located in urban areas, the largest concentration being within the city of Fresno. The Asian/Pacific Islander population increased slightly at both the city and county level.

## Employment

Fresno has an expanding economy. During the last two decades, total wage and salary employment in the county nearly doubled, with each industrial sector sharing in the growth. Economic forecasts show a continuation of rising employment levels and diversification of the economy.

Since the entire county is the most commonly identified labor market area, data within this section represents countywide information. Any smaller geographic area would ignore the labor force flow between the city of Fresno and the county of Fresno and downgrade the importance of agriculture, which is the prime industrial sector of the region. In addition, more detailed employment data are available for the county of Fresno than for smaller planning areas such as the Fresno-Clovis Metropolitan Area and the city of Fresno.

The employment sector trends for the city of Fresno are closely linked to countywide trends. For more than 30 years, the county of Fresno has one of the highest gross values of agricultural crops produced annually in the United States. Since 1975, agricultural production has exceeded \$1 billion each year, reaching the three billion mark in 1993. Steady growth in the value of agricultural products has been sustained since 1993, reaching a record high of over \$4.8 billion in 2006. The value of agricultural production is a significant indicator of the local economy, as many other sectors of the economy serve the needs of the agricultural community. Between 1980 and 2000,



agricultural production in the county increased dramatically, with the gross value of crops increasing by more than 40 percent. However, the water shortage that began with the 2014 drought caused many farmers to fallow otherwise productive land, which cost thousands of farmworker jobs, and impacted consumers throughout the region.

Table 2-5 shows the trends in employment growth in county of Fresno for all sectors of employment from 2000 to 2014. Continued steady economic expansion is expected to affect almost all employment sectors. In 2014, the largest proportion of employment (28.5 percent) was in the Professional, Business, Education, Health, Leisure, and Hospitality Industries followed by Government employment (20.8 percent).

**Table 2-5: Employment by Industry 2000-2014**

Industry	2000		2007-2011 estimates		2014	
	Number	Percent	Number	Percent	Number	Percent
Agricultural Wage and Salary Employment	44,700	13.1%	35,993	9.8%	41,200	11.0%
Non-Agricultural Wage and Salary Employment	297,600	86.9%	331,865	90.2%	333,100	89.0%
Construction/Mining	16,900	4.9%	22,404	6.1%	26,600	7.1%
Manufacturing	31,300	9.1%	25,162	6.8%	29,900	8.0%
Transportation & Utilities	14,100	4.1%	17,388	4.7%	64,800	17.3%
Trade	70,500	20.6%	57,439	15.6%	combined w/ Transportation	--
Finance, Insurance, Real Estate	14,500	4.2%	18,723	5.1%	20,100	5.4%
Professional, Business, Educational, Health, Leisure and Hospitality	not separate in 2000	--	30,018 85,659 29,614	8.2% 23.3% 8.1%	106,900	28.5%
Other Services	77,900	22.8%	23,132	6.3%	11,400	3.0%
Government	72,300	21.1%	22,326	6.1%	78,100	20.8%
Total Employed	342,200	100%	367,858	100%	374,300	100%

Source: California Department of Finance, 2000, 2006, projections 2004-2014, and 2007-2011 American Fact Finder.

Although the city of Fresno is dependent on the larger county market area, agriculture being the base industry, there are some minor differences in the employment patterns of the two populations. This may be attributed to the fact that the City of Fresno is the major provider of urban services. Proportionally, the city has less of its population directly employed in agriculture than does the county as a whole, 4 percent compared to 20 percent. According to the Fresno Economic Development Corporation, the county's top three private employers are located in the city of Fresno and are medical facilities (Community Regional Medical Center, Saint Agnes Medical Center, and Kaiser Permanente Fresno). The top three public employers are also located in the city of Fresno (Fresno Unified School District, County of Fresno, and City of Fresno).

Changes in employment patterns have evolved gradually over time. For the most part, the local economy is not expected to create any unanticipated pattern of housing demand. The city's population projections are based on an established and stable agricultural economy and employment patterns. However, the absorption rates for the

unemployed or underemployed and immigrant groups are of some concern, particularly as special government subsidies expire. Housing demand is expected to change consistent with population trends. Although employment levels are expected to increase, the Fresno General Plan has designated adequate residential land near emerging employment centers. As a result, growth can be easily accommodated.

## Household Characteristics

Household characteristics can impact the type of housing needed. For instance, single-person households often occupy smaller apartment units or condominiums, such as studio and one-bedroom units. Married couples often prefer larger single-family homes, particularly if they have children. The U.S. Census has different definitions for households and family: household is the number of related and unrelated person living together in one unit and family is the number of related persons living together in one unit.

In 2010, the Census reported 158,349 households in Fresno, which is over half (55 percent) of all households in the county. Most of Fresno's households are family households (69 percent between 2009 and 2013). The remaining 31 percent are non-family households of individuals living alone or with unrelated persons. Among Family households, 61 percent were headed by married couples and 39 percent were single-parent families. In 2010, a slight majority of Fresno's households were renters (51 percent) while 49 percent lived in owner-occupied housing units. Between 2009 and 2013, the Census Bureau estimated that the percentage of renters in Fresno had risen to 52 percent.

One of the ways to classify households, and to relate their characteristics to housing needs, is to evaluate changes in the average number of persons that they contain. These persons need not be related and the average household size is not the same as an average family size. Average household size is most commonly used to assess the number of persons per unit. Table 2-6 shows household size for 2010 as follows:

**Table 2-6: Household Size for 2010**

Household Size	city of Fresno %	county of Fresno %
1-person HH	22.1	19.8
2-person HH	26.4	26.7
3-person HH	16.6	16.4
4-person HH	15	15.7
5-person HH	9.5	10.3
6-person HH	4.9	5.3
7-person HH or more	5.5	5.6

Source 2010 Census: QT-H2: Tenure, Household size, and Age of Householder

Table 2-7 shows household size continued to grow from the 2000 to 2010. The average household size in the city was 2.99 persons per unit in 2000 and grew to 3.07 persons per unit in 2010. The County of Fresno also experienced an increase from 3.09 persons

per unit to 3.16 persons per unit during the same time period. Some reasons for this increase may include the following:

- Family members may be remaining at home longer due to economic factors related to cost of housing and/or affordable rental housing availability, or
- Family members may be returning home after a few years of independent living due to economic necessity, or
- Family groups or other associated groups may be pooling funds in order to provide a better standard of living for the group, or
- Personal, cultural, or religious preferences encourage larger households.

**Table 2-7: Household Size and Housing Unit Types 2000-2010**

Households and Housing Units	city of Fresno		county of Fresno	
	2000	2010	2000	2010
Number of households	140,079	158,349	252,940	289,391
Average household size	2.99	3.07	3.09	3.15
Total number of housing units	148,931	169,066	270,767	310,219
Single-family detached	86,537	102,894	175,380	208,335
Single-family attached	6,024	4,583	10,068	7,337
2 units	4,442	6,294	6,766	9,631
3-9 units	22,309	32,458	30,986	46,261
10-19 units	5,651	6,525	7,352	8,392
20 or more units*	20,047	11,626	26,859	15,799
Mobile homes	3,696	4,465	12,737	14,054
Other	225	221	619	410

\* A significant reduction in housing units is most likely due to a data collection methodology change by the Census Bureau. Housing Unit Type collected for all addresses during the 2000 Census data. In 2010, Housing Unit Type data was estimated based on sample of the population from 2006 to 2010.

Source: U.S. Census Bureau, 2000 Census; American Community Survey 2006-2010.

Table 2-7 also compares household size trends for the city and county. As of 2010, the county had a larger average household size (3.16 persons) than the City (3.07 persons). From 2010 to 2020, the average household size for Fresno County is expected to increase to 3.24 per person, and the city average household size is expected to remain the same at 3.07 per person.

Demographic forecasts prepared by the Fresno Council of Governments estimate that between 2010 and 2050, the number of housing units in Fresno County is expected to increase by 1.1 percent annually with multi-family housing units increasing at a slightly faster rate than single-family housing units.

## Household Income Characteristics

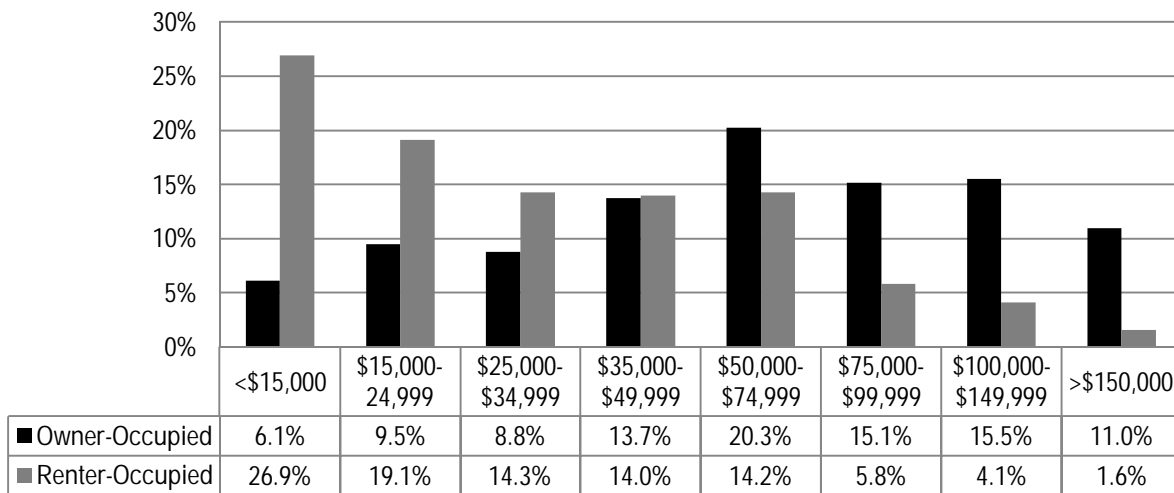
Household income level is probably the most significant factor limiting housing choice. According to the 2009-2013 American Community Survey (ACS) Census data, the median household income for the city of Fresno was \$45,563, about 8 percent higher than the County median of \$42,015. In 2013, the median income for owner-occupied households (\$63,998) was more than double that of renter-occupied households (\$27,499). As shown on Figure 2-1, in 2013, about 60 percent of renter households

earned less than \$35,000 compared with just 24 percent of owner-occupied households. In the higher income ranges, owner-occupied households largely outnumber renter-households.

For the purposes of the Housing Element, the State Department of Housing and Community Development (HCD) have established five income groups based on Area Median Income (AMI)<sup>1</sup>:

- Extremely Low Income: up to 30 percent of AMI
- Very Low Income: 31-50 percent of AMI
- Low Income: 51-80 percent of AMI
- Moderate Income: 81- 120 percent AMI
- Above Moderate Income: >120 percent AMI

**Figure 2-1: Household Income by Tenure**



Source: 2009-2013 American Community Survey

In State and federal regulations, the AMI refers to the median income for the Metropolitan Statistical Area. For the city of Fresno, this area refers to the county of Fresno. County Median Income as published by HCD must be used to establish income groups for the purpose of the Housing Element. The State 2015 AMI for a four-person household in Fresno County is \$57,900 (compared to the Federal estimate of \$47,600). By the State's standards, a four-person household earning \$46,300 or less would be considered low-income. Table 2-8 shows that about 46 percent of Fresno residents are considered lower income compared to 43 percent of all county residents.

<sup>1</sup> State income definitions are different than federal income definitions. For federal housing programs, eligibility is established for households with incomes up to only 80 percent of the AMI. These households, under the federal definition, are considered moderate income. For housing plans that are required by federal regulations, such as the Consolidated Plan and Analysis of Impediments to Fair Housing Choice, the federal income definitions are used.

**Table 2-8: Household Distribution by Income Group**

Jurisdiction	Total HHs	Extremely Low Income (0-30% MFI)	Very Low Income (31-50% MFI)	Low Income (51-80% MFI)	Moderate/ Above Moderate Income (81% + MFI)
city of Fresno	157,655	23,845 (15.1%)	22,410 (14.2%)	26,230 (16.6%)	85,170 (54.0%)
county of Fresno	287,085	37,435 (13.0%)	38,475 (13.4%)	47,860 (16.7%)	163,315 (56.9%)

Note: Because HUD programs do not cover households with incomes above 80 percent of the County Area Median Income (AMI), Comprehensive Housing Affordability Strategy (CHAS) data does not provide any breakdown of income groups above 80 percent MFI (Median Family Income).

Sources: HUD CHAS Data, 2007-2011

## Special Housing Needs

Certain groups have more difficulty finding decent, affordable housing due to their special circumstances. Special circumstances may be related to one's income earning potential, family characteristics, the presence of physical or mental disabilities, or age-related health issues. As a result, certain groups typically earn lower incomes and have higher rates of overpayment for housing, or overcrowding. A central goal of the Housing Element is to identify persons with special needs who need assistance in meeting their housing needs. Housing Element law specifically requires quantification of the housing need for seniors, persons with disabilities, female-headed households, large families, farmworkers, and persons and families experiencing homelessness.

### Senior Population

Various portions of the Housing Element describe characteristics of the senior population, the extent of their needs for subsidized housing, housing complexes developed especially for this population, and the City's provisions to accommodate their needs. Table 2-9 shows the 2000 and 2010 senior households which had occupants 60 years of age and older and 65 years of age and older. From 2000 to 2013, there was a 31 percent increase in the 65+ age group, increasing from 36,324 householders to over 47,500 households in 2013. The senior age category is expected to increase significantly over the next two to three decades as those born between 1955 through 1970 continue to age.

**Table 2-9: Households with Senior Occupants, 2000 – 2010**

Jurisdiction	2000		2010	
	Age 60+		Age 60+	
	Households	Percent	Households	Percent
city of Fresno	36,324	26%	47,559	30%
county of Fresno	71,740	28%	94,245	33%

Source: 2000, 2010 Census and American Fact Finder

Table 2-10 provides more information on senior households by tenure (whether a household rents or owns their home), based on the age of the householder. Householders age 65 and over own approximately a quarter of all owner-occupied housing. This data may indicate that there are many elderly homeowners with a need



for financial assistance in making necessary repairs or accessibility improvements to their home.

**Table 2-10: Tenure by Age of Householder, 2010**

Jurisdiction	Owner - Occupied		Renter Occupied	
	Age 65+	Percentage	Age 65+	Percentage
	Households		Households	
city of Fresno	18,995	24%	9,378	12%
County of Fresno	40,900	26%	15,792	12%

Source: 2010 Census and American Fact Finder

Regardless of tenure, elderly housing needs are wide considering income, mobility constraints, employment unavailability and stigmatization. In an effort to meet the needs of the senior community the City of Fresno and other local agencies strive to provide housing and related services to seniors of all income groups. In 2011, the City of Fresno partnered with The Be Group to construct Sierra Gateway Senior Residence II, a 68-unit senior affordable rental housing project in northwest Fresno. Also, in 2011, the City of Fresno partnered with the Bridges at Florence, LP to construct the Bridges at Florence senior apartments. The City also partnered with Ashwood Construction Inc. to build Oak Park Senior Villas, a 64-unit senior affordable rental housing project in southeast Fresno. Oak Park Senior Villas opened its doors to low-income seniors in May 2008 and continues to have a 200-name waiting list. Subsidized senior rental housing in Fresno is identified in Table 2-11 below.

**Table 2-11: Subsidized Senior Rental Housing**

Apartment Name	Tenants	Units
Californian Hotel	62+, Disabled	217
California League Fresno/Senior Citizens Village	62+	720
Delno Terrace	62+, Disabled	60
Fig Garden Villa	55+	93
Glen Agnes Apts.	62+, Disabled	149
Kings View Manor	55+	222
Las Casitas Village	55+, Disabled	74
Lula Hayes Plaza Apts.	62+	46
Masten Towers	62+, Mobility Impaired	206
Mono Hilltop Manor	62+, Disabled	59
Sierra Gateway I	62+	80
Silvercrest Residence	62+, Disabled	158
Sunnyside Glen Apts.	62+, Disabled	74
Oak Park Senior Villas	55+	65
Sierra Gateway II	62+	68
Bridges at Florence	62+	34

Source: February 2014, City of Fresno Housing and Community Development Division

There are a number of complexes specifically developed for seniors within the city of Fresno. However, affordability is still an issue and seniors comprise of approximately 20 percent of those waiting for Housing Choice Vouchers (formerly Section 8) rent subsidies.

The local agency Fresno Madera Area Agency on Aging (FMAAA) seeks to provide leadership in addressing issues that relate to older Californians; to develop community-based systems of care that provide services that support independence within California's interdependent society, and which protect the quality of life of older persons and persons with functional impairments; and to promote citizen involvement in the planning and delivery of service. The FMAAA's role is to establish and coordinate an integrated comprehensive community based system of care for seniors by targeting services towards low-income minority, rural, and functionally impaired seniors, provide nutrition and supportive services to assure maximum independence and dignity at home for the elderly in order to prevent premature institutionalization; educate the community on the issue of elder abuse and how it might be prevented; and provide opportunities for seniors to demonstrate their commitment to improving their communities.

The FMAAA provides a Senior Information & Assistance Program that links to community services, both public and private, for older adults. This service is available to seniors, their families, and others who need to become aware of the available resources in Fresno and Madera counties. Resource links include, but are not limited to, the following: adult day care, Alzheimer's long-term care, care management, disability services, education, eldercare services, financial aid, hospice, housing, insurance, law enforcement, medical referrals, recreation, veterans' services and support groups.

### Persons with Disabilities

Table 2-12 identifies the number and percent of the persons with disabilities by disability type within the city of Fresno.

**Table 2-12: Persons with Disabilities by Disability Type**

Disability	Number	Percent of Total Disabilities
Total Disabilities Tallied	129,321	100%
Total Disabilities Ages 5-64	78,833	60%
Hearing Disability	7,773	6%
Vision Disability	9,603	7%
Cognitive Disability	21,173	16%
Ambulatory Difficulty	18,775	15%
Self Care Disability	7,628	6%
Independent Living Difficulty	13,881	11%
Total Disabilities Ages 65 and Over	50,488	39%
Hearing Disability	9,184	7%
Vision Disability	4,293	3%
Cognitive Disability	6,307	5%
Ambulatory Difficulty	13,847	11%
Self Care Disability	6,353	5%
Independent Living Difficulty	10,504	8%

Source: 2010 Census, 2011 American Fact Finder

U.S. Census data for 2010 indicates that for the city, approximately 10 percent of the working population, ages 18 to 64, have some form of disability that may hamper their

ability to earn an adequate income. This figure increased by 0.4 percent from that reported in 2000. Based on the Census information, it is likely that many of the heads of households in this population group may be in need of some form of housing assistance. Households that included individuals with disabilities may also need housing with special features to allow better physical mobility for occupants. The 2015-2019 Consolidated Plan estimates that 1,820 units would adequately accommodate those individuals in the community with special needs.

The 2010 Census identifies a mental disability as a cognitive disability and reported that the 5 to 64 age group had a higher percent of cognitive disabled (27 percent) than that of the persons in the 65 and over age group, with 12 percent of the population group. The total includes homeless individuals who also suffer from a mental illness. Persons with mental disabilities are severely under-served with respect to housing. To help address this need, the County of Fresno Behavioral Health Department developed a Mental Health Services Act, and has engaged local stakeholders to develop programs available to those with mental health issues. The programs and policies identified in this Housing Element are designed to complement the needs to be identified under the Mental Health Services Act Plan.

### ***Developmental Disabilities***

According to Section 4512 of the California Welfare and Institutions Code, a "developmental disability" means a disability that originates before an individual attains age 18 years, continues or can be expected to continue indefinitely, and constitutes a substantial disability for that individual, which includes intellectual disabilities, cerebral palsy, epilepsy, and autism. This term also includes disabling conditions found to be closely related to intellectual disabilities or to require treatment similar to that required for individuals with intellectual disabilities, but does not include other handicapping conditions that are solely physical in nature.

Many persons with developmental disabilities can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Since developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The California Department of Developmental Services (DDS) currently provides community-based services to approximately 243,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers and two community-based facilities. The Central Valley Regional Center is one of 21 regional centers in the State of California that provides point of entry to services for people with developmental disabilities. The center is a private, non-profit community agency that

contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

Table 2-13 identifies the number of persons with developmental disabilities by age category and zip code within the city of Fresno receiving Regional Center services.

In the 0-14 age category, zip codes 93702, 93705, 93722, 93726, and 93727 have the highest concentration of developmentally disabled children. In the 15-22 age category, zip codes 93722 and 93727 have the highest concentration of developmental disabled youths. In the 23-54 age category, zip codes 93702, 93705, 93710, 93722, 93726, and 93727 have the highest concentration of developmental disabled adults. In the 55-64 age category, zip codes 93710, 93722, and 93727 have the highest concentration of developmental disabled seniors. In the 65+ age category, zip codes 93722 and 93727 have the highest concentration of developmental disabled elderly population.

The zip codes with the highest population of developmental disabled individuals are 93722 and 93727. These zip codes are located in the southwest and southeast portions of the city.

**Table 2-13: Persons with Developmental Disabilities by Age and Zip Code**

Zip Code	0-14 yrs	15-22 yrs	23-54 yrs	55-64 yrs	65+ yrs
93724	1	0	0	-0-	-0-
93650	14	8	8	2	0
93701	42	23	38	2	0
93702	177	59	142	10	7
93703	120	58	80	9	4
93704	84	22	53	11	4
93705	144	59	109	11	1
93706	106	41	88	3	5
93710	84	55	104	20	11
93711	78	16	72	17	7
93721	12	1	20	2	6
93722	309	133	242	36	17
93725	81	39	61	8	4
93726	132	43	162	13	7
93727	288	87	204	24	17
93728	51	15	30	4	5
93729	0	0	0	0	0
93792	1	0	0	0	0
Total	1,724	648	1,413	172	95

Source: Central Valley Regional Center, February 2016.

### ***Resources for Persons with Disabilities***

The City of Fresno's Department of Public Works has a long history of seeking input from persons with disabilities. Since the early 1990s, citizen advisory groups made up of persons with disabilities have met regularly to consult on city transit, para-transit, infrastructure and compliance with the Americans with Disabilities Act. In 2008, the City

decided to formalize and expand these efforts through the formation of the City of Fresno Disability Advisory Commission. This Commission is a seven-member body selected by the Mayor and confirmed by City Council, designed to bring community leaders together to advise on issues affecting people with disabilities. Four of the seven voting members are persons with disabilities, and every effort is made to include members with expertise in a broad range of disability issues.

Additionally, the City's Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs require that all multi-family residential development projects of more than 5 units contain accessibility accommodations. Special features may include: appropriate ramps, doorways, bathrooms, kitchen facilities, etc., to meet the needs of persons with physical, mobility and hearing related disabilities.

Periodically, the City sets aside funds to implement a Disabled Accessibility Grant Program. The program, when available, provides for individuals with physical disabilities to make accessible improvements to their owner-occupied home. Funds for the grant program are made available through the U.S. Department of Housing and Urban Development (HUD), HOME Investment Partnerships (HOME) Program. Grant amounts vary from \$4,000.00 to \$10,000.00.

Additionally, the Resources for Independence, Central Valley Center (RICV), previously known as the Center for Independent Living Fresno (CIL Fresno), provides peer counseling, information and referral, independent living skills training, individual advocacy for a particular individual and systems advocacy for the community. RICV is also a vital link between disabled persons and service providers; providing linkages for Central Valley Regional Center, ARC Fresno, United Cerebral Palsy of Central California, Valley Center for the Blind and the Talking Book Library for the Blind, the Deaf and Hard of Hearing Service Center, Inc. (DHHSC) and Exceptional Parents Unlimited (EPU), among other services. RICV is also partnering with CSU Fresno Rehabilitation Counseling Program and the San Joaquin District DOR office to implement the Central Valley Institute for Disability and Rehabilitation. The Institute will be a totally unique organization that will combine research in best practices for services for people with disabilities, the education of graduate level students in Rehabilitation Counseling and university students in other disability-related fields, and direct services to people with disabilities through RICV, job placement services, and counseling services.

Finally, there are also a number of resources for individuals with Autism, including the California Autism Center and Learning Group, Families for Early Autism Treatment (FEAT) and The Sequoia Area Board.

Table 2-14 identifies the number of persons with physical disabilities by employment status.

**Table 2-14: Persons with Physical Disabilities by Employment Status**

Age	Number	Percent
5 to 64 Employed w/disability	5,394	27%
5-64 Not Employed w/disability	14,648	73%
Total persons 5-64 w/disability	5,394	100%

Source: 2000 Census PCT028. Note: Employment data for all disabilities not considered physical is not provided and creates a shortage in total count.

## Single-Parent Households

Single-parent households, and in particular female-headed households, face significant challenges in meeting the daily needs of their families. These households are typically low-income families as they count on only one paycheck to cover housing and living expenses. Female-headed households are met with difficult decisions such as paying for housing or buying food or prescription medicines. These families also face an extreme hardship in obtaining childcare, securing medical insurance, finding well paying jobs and locating safe and decent affordable housing.

As a percentage of all households, families within the city have increased during the 2000 to 2010 period. The 2010 Census reported a total of 158,349 households, including 111,529 family households. According to Tables 2-15 and 2-16, in 2010, 42,245 or 27 percent of all City households were headed by a single individual. Within the City, female-headed households with children under 18 years of age comprised 11.6 percent of the total households.

These household characteristics have required gradual changes in the local housing stock, slightly increasing the need for family housing and slightly decreasing the need for single-person housing.

**Table 2-15: Female Heads of Household, 2010**

Jurisdiction	Total Households	Female Headed Households (No Spouse)	Percent of all Households	Female Households with Children Under 18	Percent of all Households
city of Fresno	158,349	30,547	19.2	18,424	11.6
county of Fresno	289,391	48,882	16.8	28,575	9.8

Source: 2010 U.S. Census

**Table 2-16: Male Heads of Household, 2010**

Jurisdiction	Total Households	Male Headed Households, No Spouse)	Percent of all Households	Male Headed Households with children under 18	Percent of all Households
city of Fresno	158,349	11,698	7.3	6,160	3.8
county of Fresno	289,391	21,041	7.2	10,933	3.7

Source: 2010 U.S. Census

One important housing resource for female-headed households is the Housing Choice Voucher Program. The Housing Authority of the City and County of Fresno is extremely oversubscribed for the Voucher Program but is accepting new applicants and has moved to a lottery system to try and accommodate the large number of applicants.

To assist in meeting the needs of female-headed households, the City has identified Programs in Chapter 6 of this Housing Element, to assist in the development of affordable multi-family housing. City-sponsored multi-family housing is encouraged to provide childcare facilities on-site, recreation rooms, tot-lots and media rooms which are expected to provide direct assistance to female-headed households.

## Large Families/Households

Large families or large households are defined as those families or groups of people containing five or more persons. Analysis of changes in the number of large families/groups is essential because of their distinctive demand on local housing resources.

Table 2-17 provides 2000 and 2010 comparative information on the number and percentage of large families within the city of Fresno and Fresno County. Of the total 158,349 occupied housing units in the city of Fresno, 31,490 or 19.8 percent represented family or households that contained five or more members. Of the total 289,391 occupied housing units in the County of Fresno, 61,781 (21 percent) were occupied by family or households that contained five or more members.

**Table 2-17: Large Households 2000 and 2010**

Area	2000		2010	
	Number of Large Households	Percent of Total Households	Number of Large Households	Percent of Total Households
city of Fresno	25,853	18%	31,490	20%
county of Fresno	49,921	20%	61,781	21%

Source: 2000 and 2010 Census and American Fact Finder

It appears from the 2010 Census data that the city and county of Fresno are trending toward larger families. Analysis of the changes in the number of large families/households is important to determine the needs of the large family or household unit. Families or household with five or more would be considered living in overcrowded conditions when living in units having less than five rooms (not including kitchens and bathrooms).

As shown in Table 2-18, approximately 40 percent of all households live in a 3-bedroom unit and approximately 24.9 percent live in a 2-bedroom unit. Table 2-19 shows that large households (5+ persons) are slightly more likely to be renters.

Low-income families have a great housing need due to the hardships faced in obtaining decent and low-cost housing opportunities. While the city may have a large stock of



rental housing, experience has shown that most affordable facilities do not include sufficient 3+ bedroom units to accommodate large families. Additionally, a large number of affordable housing units (specifically un-subsidized units) have been found to be unsafe, unsanitary and/or structurally deficient.

The City of Fresno encourages the development of subsidized and private multi-family rental units citywide that incorporate services and facilities to assist large families with housing and other related services. Most City-subsidized housing facilities include computer rooms, media centers, tot lots and community rooms. The City's Development and Resource Management Department seeks to encourage similar amenities in private multi-family projects.

**Table 2-18: Existing Housing Stock Number of Bedrooms**

Bedroom Type	All Households	
	Number	Percent
Zero	6,419	3.8
1 BR	17,804	10.4
2 BR	50,190	29.4
3 BR	68,393	40.1
4 BR	22,417	13.1
5+ BR	5,272	3.1
<b>Total</b>	<b>170,495</b>	<b>100</b>

Source: 2010 Census, American Fact Finder

**Table 2-19: Household Size by Tenure**

Tenure	1-4 Persons		5+ Persons		Total	
	Number	Percent	Number	Percent	Number	Percent
Owner	63,516	50%	14,241	45%	77,757	49%
Renter	63,343	50%	17,249	55%	80,592	51%
<b>Total</b>	<b>126,859</b>	<b>100%</b>	<b>31,490</b>	<b>100%</b>	<b>158,349</b>	<b>100%</b>

Source: 2010 Census, American Fact Finder

## Farmworkers

There is a serious deficiency of reliable data about the farmworker population. The lifestyle of a migrant or seasonal farmworker makes tracking and data analysis difficult; due to their frequent mobility, they are generally undercounted by the U.S. Census. Often farmworkers do not have a fixed physical address and work intermittently in various agricultural and non-agricultural occupations during a single year, with minimal employer-employee communication. Many live in rural, often remote areas of the county and in smaller cities within the county. A May 8, 2013 study entitled *Farmworker and Rural Housing Conditions in California's San Joaquin Valley* showed that the largest farmworker populations were located in the cities of Firebaugh, Mendota, Parlier, and San Joaquin.

Also, many farmworkers have limited English-speaking ability and are not thought to be acquainted with governmental agencies and agents, including those who work for the Census Bureau. Inaccurate data makes it difficult to determine the degree of the lack of

housing, and other needs and services required by this population. According to 2010 Census Bureau, the number of civilian employed population 16 years and older, employed in agriculture, forestry, fishing, hunting, and mining, totaled approximately 4.5 percent of the workforce. As a large number of farmworkers live in unofficial dwellings there is the potential to be missed or not counted by the Census Bureau.

Farmworkers have the lowest family income and highest poverty rate of any occupation surveyed by the Census Bureau. Farmworkers have the lowest educational attainment and are second from the lowest (after the private housekeeper occupation) in home ownership. The average annual farmworker wage is thought to be around \$10,000 to \$11,000 (less than minimum wage) a year. In 2012, the average 2-bedroom unit was listed at \$829 per month, which equates to a minimum living wage of \$15.94 per hour or \$33,155.20 per year.

Farmworkers also have one of the lowest rates of health insurance coverage and are overwhelmingly non-citizens (including legal residents, workers with a permit, or undocumented residents). According to the National Center for Farmworker Health, Inc., there is a national Migrant Health Center that lists health center throughout the United States. The Center periodically seeks to obtain updated information about migrant and seasonal farmworkers, including where they are working and living and what crops are being harvested, in order to more appropriately target limited resources to areas of the greatest migrant and seasonal farmworker need.

The primary factor behind the farmworker housing shortage is that, unlike the earlier years of farming, many farmer owners have ceased to provide housing for their workers. A shrinking supply of housing increases the demand which has led to higher prices in rural areas, resulting in housing costs that are extremely high relative to the farmworker income. This results in significant overpayment, extreme overcrowding and deplorable living conditions. The farmworker workforce has changed over the years to include more solo males and undocumented migrants. Most aim to maximize their savings and are unable or unwilling to pay market rents for temporary housing. Since many publicly-owned or managed housing facilities are restricted to families, the newest and neediest workers must seek housing in market rate units, where several workers share a housing unit or motel room. Some may even sleep in cars or other unconventional sleeping quarters.

The amount of farmworker housing registered with the State has declined dramatically in the last few decades. In 1955, growers registered more than 9,000 facilities to house migrant and seasonal workers. By 1982, only 1,414 employer-owned camps were registered. In 1994, only 900 camps were registered, with a capacity of 21,310 workers. In 1998, according to the Department of Housing and Community Development, there were only 500 farm labor camps registered. Not surprisingly, a 1995 study by the University of California at Davis estimated that 250,000 farm workers and their family members had inadequate housing, including 90,000 migrant workers and over 160,000 non-migrant seasonal farmworkers. The housing shortage was so severe that many workers were found living in trailers with 10 to 12 other individuals, and sleeping in

garages, tool sheds, caves, fields and parking lots. Consequently, the major farmworker housing policy issue has shifted from regulating employer-provided housing to direct provision and/or management of farmworker housing. A 2010 report entitled *Identifying High Concentration of Migrant and Seasonal Farmworkers*, estimates that approximately 12 percent of the State's farmworker population resides in Fresno County. The 12 percent equates to approximately 56,500 farmworkers in the County of Fresno.

Migrant farmworkers face a number of challenges related to housing:

- A majority of migrant farmworkers who do not live in government-sponsored labor camps live in seriously substandard conditions.
- Substandard housing conditions exist in areas with significant seasonal agricultural production.
- Housing conditions are a major problem for both single migrant workers and migrant families.
- Poor housing hurts migrant children's health, education, and general welfare.

Employment on California farms has decreased, as noted above, and there are many speculations about the cause. Some speculate that farmworkers who arrived in the U.S. decades ago are aging and their children are reluctant to do farm labor. Tighter border enforcement or the rebounding Mexico economy could also impact agricultural employment in California. In addition, cartel violence along the Mexico/California border may impact migration, or farmworkers may simply find other work in their homeland.

Small farmworker (migrant and non-migrant) housing can be met in any residential zone within the city of Fresno. Special housing for farmworkers/farm labor camps is most appropriate in areas near agricultural employment. The City also supports applications for new farmworker housing within the city. The City's Zoning Ordinance does not prohibit farmworker housing in Fresno, nor the types of units that serve the farmworker population, including units for single males, or typical multi-family units.

In addition, the City continues to work with the Fresno Housing Authority to provide farmworker housing in the community. The Housing Authority of the City and County of Fresno manages 130 housing units for migrant farmworkers in Parlier. The complex is owned by the State of California, Office of Migrant Services. In addition, the Housing Authority owns and manages a 64-unit migrant housing complex in Firebaugh. Both complexes are occupied six months out of the year, from April through October. Migrant farmworker families who want to rent a unit in Firebaugh or Parlier must demonstrate that at least half of their earned income is farm related, they must show evidence of a permanent residence at least 50 miles from the work site, and they must be legal residents of the United States. The cost of managing and maintaining both complexes is subsidized by the State of California, Office of Migrant Services.

The State Housing and Community Development administers more than 20 programs that award loans and grants to local public agencies, private non-profit and for-profit housing developers, and service providers every year. This money supports the

construction, acquisition, rehabilitation and preservation of affordable rental and ownership housing, childcare facilities, homeless shelters and transitional housing, public facilities and infrastructure, and the development of jobs for low-income workers. Many of these programs and funding sources can be utilized to provide housing for farmworkers.

### **Households with Emergency Housing Needs**

Emergency housing is that housing or shelter which exists for the use of individuals and households in the community who, in addition to lacking adequate financial resources, are without shelter due to a crisis from a legal, personal or natural disaster. This type of housing is intended as temporary refuge until a permanent solution can be developed. Therefore, emergency housing does not include seasonal employees such as migrant farm workers who traditionally follow their jobs to various locations.

Emergency shelter is also necessary for families suffering from domestic abuse and homeless youth. In 2013, the Fresno-Madera Continuum of Care estimated that 16,478 persons within Fresno County are homeless. Within the city of Fresno, 8,824 persons are homeless.

Persons threatened with homelessness are those with current shelter, but who are at risk of losing their residence. Among the persons at-risk are those leaving institutions (mental hospitals, jail, etc.), victims of domestic violence, people doubled-up in unstable conditions, households with incomes of less than 30 percent of area median income and high housing expenses, farm workers and low-income single-person households. The greatest needs for assistance include short-term financial aid programs to assist persons at-risk with finding shelter, maintaining a home, and educating tenants on their rights and responsibilities so that they are not legally or illegally evicted or discriminated against. The City currently provides Emergency Solutions Grant funds to organizations which seek to find shelter for homeless individuals and help those threatened with becoming homeless.

In Fresno, emergency shelters are allowed without discretionary review in the RMX, CG, IL, and PI zoning districts. Combined, these zone districts make up 14,674 acres of the city. In addition to the same land use regulations and development standards that apply to all development within the identified districts (e.g., lot size, setbacks, building height, etc.), an emergency shelter proposed in this district must also comply with specific operational standards found in Section 15-2729 of the Development Code, which are consistent with the limits established by State law.

In 2013, the Fresno Unified School District reported that 2,400 schoolchildren are homeless. In 2014, California's new Local Control Funding Formula distributed \$58 million to Fresno Unified. The amount was based on the School District's number of low-income students, English language learners, and the number of foster and homeless youths.

The facility and service needs of the homeless population are many and varied. Most persons and families are homeless because of poverty, poor credit, expected or unexpected decreases in income or earning power, mental disabilities, alcohol and drug abuse, criminal records, and/or domestic violence. There is a need for emergency shelter, accessible shelters, transitional housing, life skills' mentors, child-care during rehabilitation programs, insurance coverage, places to use as addresses or receive mail, and programs to stimulate and foster family and other support networks.

There is a need to address shelter restrictions that separate families, pets, and caregivers thus undermining support networks, family structures, and removing emotional support and comfort. There is a need for credit counseling and a network to assist homeless persons and families with obtaining personal paperwork, such as birth certificates, military information, and social security information, and a need for education and counseling. Transitional housing and persons transitioning from homelessness need to be integrated into residential neighborhoods where job and affordable housing opportunities exist.

To address the vast needs of homeless individuals and those at risk of becoming homeless, the City of Fresno, County of Fresno, and other civic leaders, service providers, business leaders, and advocates for homeless issues partnered to craft the *10-year Plan to End Chronic Homelessness Throughout Fresno County*. The 10-year plan consists of goal-oriented, systematic, collaborative, and accountable approaches to providing services and housing to homeless individuals in Fresno County.

Also as the founder of *First Fresno Steps Home*, the City works cooperatively with a City-sponsored non-profit, in administering and implementing the Homelessness Plan. The City of Fresno founded *Fresno First Steps Home* with the goal of raising money and giving it to entities that provide housing and other supportive services to chronically homeless individuals. In 2013, *Fresno First Steps Home* raised nearly \$1 million in private donations from individuals, foundations, corporations, and private entities.

A significant program established in 2007 to connect homeless individuals with resources is the 211 call center. The call center, which is operated by the United Way, puts individuals in touch with applicable agencies and resources that are available countywide. This call center addresses a broad variety of issues, from domestic violence to childcare.

In February, 2015 the Multi-agency Access Program (MAP) Point at the Poverello House was opened and continues to operate as an integrated intake process connecting individuals facing housing, substance abuse, and/or medical illness challenges to supportive services. During the 2015 Point-In-Time Count, service agencies documented an overall 40 percent decrease in the homeless population. Results from the 2016 Point-In-Time Count are expected in June, 2016.

Each year, the Fresno-Madera Continuum of Care takes a *Point-In-Time Survey* of the homeless population. The results direct collaborative efforts toward the ever changing services needs of the homeless population. This year's Point-In Time count, which

covered the period from January 2014 to January 2015, showed the total number of individuals experiencing homelessness in Fresno fell from 2,114 to 1,270, with a 21% drop in sheltered individuals and a 47% decrease in unsheltered individuals.

## Housing Characteristics

In Fresno, single-family housing units make up most of the city's housing stock. Past housing crises created a huge inventory of single-family houses, most of which have been purchased by investors to rent out. Since 2000, the largest increase in units has been associated with construction of new multi-family housing units. Housing in complexes with 3 to 9 units have increased since 2000 from 16 percent of the housing stock to 20 percent in 2010. Housing in the 10 to 19 unit range remained the same from 2000 to 2010, and is expected to remain the same through 2020. Housing provided in facilities with 20 or more units declined 9.5 percent between 2000 (14 percent) and 2010 (7.5 percent). Single-family attached units have also declined from 2000 to 2010, from a reported 4.3 percent to 3 percent, and is expected to remain the same through 2020. These increases and decreases in housing types suggests that, at the time, the greatest need for housing was in the single-family, large multi-family, and 3 to 9 unit complexes. In 2010 there were 34 mobile home parks in the city with 3,744 mobile homes.

Table 2-20 identifies the total housing units for the city of Fresno and the county of Fresno in 2000, 2006, and 2010. Although the number of housing units in the city of Fresno is increasing considerably over time, the rate increase is lower than that of the county. In 2006, the number of housing units in Fresno had risen to 163,704, an increase of 14,679. In 2010, the number of housing units in the city and the county increased about the same and only slightly.

**Table 2-20: Total Housing Units 2000, 2006, 2010**

Jurisdiction	2000		2006		2010	
	Housing Units	Percent Change From 1990	Housing Units	Percent Change From 2000	Housing Units	Percent Change From 2006
city of Fresno	149,025	15.2%	163,704	9.9%	170,495	4.1%
county of Fresno	270,767	14.9%	299,578	10.6%	313,355	4.6%

Sources: 2000 Census, 2006 American Fact Finder Estimates, and 2010 American Fact Finder

## Tenure

Table 2-21 shows the breakdown of owner-occupied versus rental units from the 2010 Census. In the city of Fresno, there are slightly more renter-occupied units as compared with owner-occupied units. At the county level, owner-occupied household represents a larger portion of occupied housing units.

**Table 2-21: Occupied Housing Units, 2010**

Jurisdiction	Total Occupied Housing Units	Owner Occupied Housing Units	Renter Occupied Housing Units
city of Fresno	156,724	77,235 (49.3%)	79,489 (50.7%)
county of Fresno	285,338	156,979 (55.0%)	128,359 (45.0%)

Source: 2010 U.S. Census

## Vacancy

A certain number of vacant units are needed to moderate the cost of housing, allow sufficient choice for residents and provide an incentive for unit upkeep and repair. Vacancy rates are generally higher among rental properties, as rental units have greater attrition than owner-occupied units. A healthy vacancy rate is considered to be two to three percent for ownership units and five to six percent for rental units. When the overall vacancy rate decreases, population mobility within an area becomes limited. Table 2-22 shows that the total vacancy rate in 2010 was 7.6 percent for the city of Fresno, and 8.3 percent for Fresno County.

**Table 2-22: Vacancy, 2010**

Jurisdiction	Total Housing Units	Occupied Housing Units	Total Vacant
city of Fresno	171,288	158,349	12,939 (7.6%)
county of Fresno	315,531	289,391	26,140 (8.3%)

Source: 2010 U.S. Census

## Age of Housing

Housing ages and deteriorates over time. If not regularly maintained, structures can deteriorate and discourage reinvestment, depress neighborhood property values, and even become health hazards. Maintaining and improving housing quality is an important goal for communities.

Housing age can be an indicator of the need for housing rehabilitation. Generally, housing older than 30 years (i.e., built before 1980), while still needing rehabilitation, will not require rehabilitation as substantial as what would be required for housing units older than 50 years old (i.e., built before 1960). Housing units older than 50 years are more likely to require complete rehabilitation of housing systems such as roofing, plumbing, and electrical.

According to the 2008-2012 American Community Survey, 56 percent of housing in Fresno was built before 1980 (35 years old or more) and 25 percent was built before 1960 (55 years old or more).



Periodically, the City of Fresno's Housing and Community Development Division administers a housing rehabilitation program for low-income households living in owner-occupied single-family homes. The Targeted Area Rehabilitation Program, also operated periodically, provides a zero-percent interest deferred payment loan to low-income, owner-occupied households for needed repairs and improvements.

## Overpayment and Overcrowding

Overpayment, or housing cost burden, is generally defined as households paying more than 30 percent of their gross income on housing related expenses, including rent or mortgage payments and utilities. High housing costs can cause households to spend a disproportionate percentage of their income on housing. This may result in payment problems, deferred maintenance or overcrowding. Table 2-23 shows the number and percent of overpaying owner households and renter households.

In 2011, over 40 percent of the owner population and 65 percent of renter population were overpaying, representing an increase from 2006 at 39 and 54 percent, respectively. Housing affordability has declined for both owners and renters as the percent of households overpaying has increased.

**Table 2-23: Households Paying in Excess of 30% for Housing**

Household (HH)	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total	Lower Income
<b>Ownership</b>	<b>6,675</b>	<b>7,196</b>	<b>11,831</b>	<b>11,921</b>	<b>32,158</b>	<b>69,781</b>	<b>25,702</b>
Overpaying HH	4,781	4,598	6,651	7,960	4,475	28,464	16,029
% of overpaying owners	71.6%	63.9%	56.2%	66.8%	13.9%	40.8%	62.4%
<b>Renter HH</b>	<b>23,563</b>	<b>14,504</b>	<b>16,653</b>	<b>8,367</b>	<b>9,092</b>	<b>72,180</b>	<b>54,720</b>
Overpaying renter HH	21,896	11,989	9,913	3,050	255	47,103	43,798
% of overpaying renters	92.9%	82.7%	59.5%	36.5%	2.8%	65.3%	80.0%
Total HH	30,239	21,700	28,484	20,288	41,250	141,961	80,422
<b>Overpaying HH</b>	<b>26,677</b>	<b>16,587</b>	<b>16,563</b>	<b>11,010</b>	<b>4,730</b>	<b>75,567</b>	<b>59,827</b>
% of overpaying HH	88.2%	76.4%	58.1%	54.3%	11.5%	53.2%	74.4%

Source: 2007-2011 American Community Survey

Some households may not be able to accommodate high cost burdens for housing, but may instead accept smaller housing or reside with other individuals or families in the same home. Although there is more than one way of defining overcrowded housing units, the definition used in the Housing Element is 1.01 or more persons per room, the same definition used in the U.S. Census. It should be noted that kitchenettes, strip or Pullman kitchens, bathrooms, porches, balconies, foyers, halls, half rooms, utility rooms, unfinished attics, basements, or other space for storage are not defined as rooms for Census purposes.

Table 2-24 indicates the extent of overcrowding within the city and county, for Census years 2000 and 2010. Between 2000 and 2010, the number of overcrowded housing units in the city of Fresno decreased 6.7 percent, from 23,662 to 16,051. In the county of Fresno, overcrowded housing units decreased 7.2 percent, from 43,309 to 28,439.

**Table 2-24: Overcrowded Housing Units 2000 and 2010**

Jurisdiction	2000		2010	
	Number of Overcrowded Units	Percent of Overcrowded Units	Number of Overcrowded Units	Percent of Overcrowded Units
city of Fresno	23,662	16.9%	16,051	10.2%
county of Fresno	43,309	17.1%	28,439	9.9%

Source: 2010 Census and American Fact Finder.

Overcrowding is typically defined as more than one occupant per room. According to the 2007-2011 American Community Survey, 5.4 percent of owner-occupied homes were considered to be overcrowded and close to 15 percent of renter households were overcrowded. One and half percent of owner occupied units experienced severe overcrowding (Table 2-25) and 6.2 percent of the renter occupied units experienced severe overcrowding. Severe overcrowding is defined as 1.5 persons or more per room. Owner-occupied housing units have historically had a lower incidence of overcrowding than that of rental housing, and this trend continues. Overall, 10.2 percent of households in Fresno were overcrowded and 3.8 percent of households were severely overcrowded.

**Table 2-25: Overcrowded/Severely Overcrowded Households**

Tenure	Overcrowded/Severely	Units	Percent
Owner Occupied	Overcrowded	4,182	5.4% of Owner Occupied HHs
Renter Occupied	Overcrowded	11,869	14.9% of Renter HHs
<b>Total Overcrowded</b>		<b>16,051</b>	<b>10.2% of All HHs</b>
Owner Occupied	Severely Overcrowded	1,131	1.5% of Owner Occupied HHs
Renter Occupied	Severely Overcrowded	4,894	6.2% of Renter HHs
<b>Total Severely Overcrowded</b>		<b>6,025</b>	<b>3.8% of All HHs</b>

Source: American Community Survey 2007-2011

Large overcrowded households tend to fall disproportionately in low-income groups. The housing needs of these households are one of the most difficult ones to alleviate. Rent subsidies are available but usually oversubscribed and the typical Fresno apartment is not nearly large enough to accommodate these larger households and it may be several years before most of them will have sufficient incomes to purchase a larger single-family house through the private market.

## Housing Quality

In 2007, the City completed a citywide housing quality survey. The housing quality survey point system places structural issues that affect health and safety into one of five categories:

- Sound: Appears new or well maintained and structurally intact.
- Minor: Shows signs of deferred maintenance, or areas that need only one major component such as a roof.
- Moderate: In need of replacement of one or more major components and other repairs, such as roof replacement, painting, and window repairs.

- Substantial: Requires replacement of several major systems and possible other repairs (e.g. complete foundation work, roof replacement/re-roofing, as well as painting and window replacement.)
- Dilapidated: Suffers from excessive neglect and building appears structurally unsound and maintenance is non-existent, is not fit for human habitation in its current condition, may be considered for demolition or at minimum, major rehabilitation will be required.

As shown on Table 2-26 and 2-27, based on the survey, it was estimated that 6.4 percent of housing units were in need of rehabilitation.

**Table 2-26: Housing Quality Estimates Based on Actual Total Units**

Housing Quality	Units	Percentage
Sound	152,784	93.56
Minor Rehabilitation Needed	8,221	5.03
Moderate Rehabilitation Needed	2,030	1.24
Substantial Rehabilitation Needed	191	0.12
Dilapidated - Demolition Needed	72	0.04
<b>Total Units</b>	<b>163,298</b>	<b>100.0</b>

**Table 2-27: Field Survey Tabulation by Planning Area**

Planning Area	Total Units	Total Units Surveyed	% Sound	% Minor	% Moderate	% Substantial	% Dilapidated	% Needing Work
Bullard	29,541	3,089	92.85	5.47	1.39	0.16	0.13	7.15
Central	4,675	2,224	82.15	15.78	1.48	0.45	0.13	17.85
Edison	7,693	2,786	89.95	9.48	0.18	0.29	0.11	10.05
Fresno	19,702	3,778	93.99	5.45	0.50	0.00	0.05	6.01
Hoover	19,274	3,537	96.13	3.68	0.20	0.00	0.00	3.67
McLane	19,701	3,043	97.08	2.86	0.03	0.03	0.00	2.92
Roosevelt	33,204	3,249	91.47	4.37	3.91	0.25	0.00	8.53
West	12,132	2,871	95.44	0.98	3.59	0.00	0.00	4.56
Woodward	17,376	2,776	99.93	0.00%	0.07	0.00	0.00	0.07
<b>Totals</b>	<b>163,298</b>	<b>27,353</b>	<b>93.56</b>	<b>5.03%</b>	<b>1.24</b>	<b>0.12</b>	<b>0.04%</b>	<b>6.44</b>

Note: Field survey tabulations were conducted by Community Planning Area in 2007. At that time, Community Planning Area geographic divisions were used for analysis purposes in the City's 2025 General Plan and Housing Element. With the comprehensive update to the General Plan, Development Areas replaced Community Planning Areas and are currently (2015) in use in the Fresno General Plan. As these areas differ geographically, no conversion or comparison is available.

The greatest need for rehabilitation remains in the southwest, southeast, and south central areas, all of which are located within designated Community Development Block Grant areas. A majority of the housing stock in these areas are targeted for some form of rehabilitation. Most of the units in these areas were constructed during the 1970s and require lead abatement as well as minor to major rehabilitation. Types of rehabilitation noted for these targeted areas include roof and porch replacement, plumbing upgrades, electrical upgrades, garage restructure, and deferred maintenance items.

It is important to note that this rating is based on a sampling of exterior conditions only. The highest concentration of moderate, substantial and dilapidated housing units is located within the Central Planning Area with nearly 18 percent needing some repair. It should also be noted that the figures represent a significant improvement over the last survey, in 2001. Within the Central Community Area, the portion of units needing work dropped from 60 percent to fewer than 20 percent.

Recognizing the need for housing rehabilitation, the City began operating a Rehabilitation Program to assist owner-occupants with their housing rehabilitation needs. Funding for the program is provided by the HOME Investment Partnerships (HOME) Program and Community Development Block Grant (CDBG) Program and varies annually.

In addition, the City sets aside a small portion of CDBG funds to address properties that have an imminent health and safety issue that must be immediately addressed. These rehabilitation funds pay for eligible items such as roofs, plumbing and electrical problems, water heater replacement, and other structural deficiencies.

According to the 2008-2012 American Community Survey, of the city's 157,649 total occupied housing units, 2.2 percent represent housing structures that lack complete plumbing and kitchen facilities. These units are clearly uninhabitable for any duration of time and may be of demolition quality. The Census may be undercounting, as it does not necessarily reflect the additional rehabilitation needs for units in foreclosure. To help combat this issue, the City has proposed a program by which it forgoes citation fees (between \$15,000 to \$100,000) for certain structures if a property owner agrees to spend the citation amount on a rehabilitation budget that brings their property back to a habitable or resale condition.

The City has two foreclosure ordinances that address the maintenance of foreclosures in Fresno. Ordinance 10-620 requires owners of property in foreclosure to register their property with the City Code Division and provides for the owners to maintain their properties and not allow the properties to fall into a dilapidated state. Under Ordinance 10-617, property owners are required to actively maintain, monitor, and keep their vacant structures secured. This includes residential, multi-residential, accessory, commercial, or industrial structures.

The City continues its proactive approach to assist low-income households with their rehabilitation needs through rehabilitation programs. The rehabilitation goals for the Housing Element plan period are outlined in Chapter 6 . Housing Plan. During the previous planning period (2008 to 2013), the City completed 288 rehabilitation projects, most of which were within the greatest need areas.

## **Housing Costs**

Housing values in Fresno County were hard hit by the 2008 housing market crash. The average single-family home value peaked in 2006 at about \$325,000 and was at its

lowest in 2011 at less than \$150,000. Similarly, the average condominium/townhome value (a small part of the market) peaked at about \$230,000 in 2006 and then sank to \$90,000 in 2011. However, the market began to rebound in 2012 and more recent data suggests that this trend will continue.

Table 2-28 indicates that between 2013 and 2014, home sale prices increased at both the city and county level. In 2014, the median sale price for a home in the City of Fresno was \$190,000. The data indicates that in Fresno housing is still moderately priced, and therefore more affordable in comparison to county and statewide housing.

**Table 2-28: 2014 Home Sales**

Year	county of Fresno	city of Fresno
Sale Count	10,411	6,431
2013	\$185,000	\$173,000
2014	\$209,000	\$190,000
% Change	13.0%	9.8%

Note: Data not available for unincorporated county.

Source: DQ NEWS, <http://www.dqnews.com/Charts/Annual-Charts/CA-City-Charts/ZIPCAR14.aspx>, 2015

From 2000 to 2006, gross rent in the city rose 39 percent, from \$538 to \$748 (Table 2-29). By 2011, the gain was an additional 22 percent, to \$866. It was estimated that from the 2010 HUD Comprehensive Housing Affordability Strategy (CHAS) dataset, approximately 35,197 of the 78,910 renting households are paying more than 30 percent of their household income and 42,320 are paying between 31 to 50 percent. In 2013, the median rent decreased slightly from that in 2011.

**Table 2-29: Median Gross Rent 2000 - 2011**

Year	city of Fresno
2000	\$538
2006	\$748
2011	\$866
2013	\$859

Source: City-data.com Fresno Residential Rent and Rental Statistics

In absolute terms, gross rents tend to be lower in local jurisdictions than in the State as a whole. For instance, the Fresno city median rent was \$334 lower than the statewide median in 2011. It is assumed that those differences can be attributed to lower land costs in the Central Valley than in larger urban areas of California. Fresno and the surrounding cities have some of the most affordable rents in the State.

HUD's Fiscal Year 2014 Fair Market Rent figures for Fresno are outlined in Table 2-30.

**Table 2-30: Fiscal Year 2014 Fair Market Rents by Unit Size**

	<b>Efficiency</b>	<b>One-Bedroom</b>	<b>Two-Bedroom</b>	<b>Three-Bedroom</b>	<b>Four-Bedroom</b>
Fair Market Rent	\$630	\$655	\$827	\$1,162	\$1,356

Source: [http://www.huduser.org/portal/datasets/fmr/fmrs/FY2014\\_code/2014summary.odn](http://www.huduser.org/portal/datasets/fmr/fmrs/FY2014_code/2014summary.odn)

## **Housing Affordability**

Housing experts typically recommend that a household spend less than 30 percent of monthly earnings on housing costs. The 2010 HUD CHAS data indicated that 23 percent of the renter household population spent between 30 and 50 percent of their income on gross rent. Income data from HUD CHAS also showed that 37 percent of owners spent between 30 and 50 percent of their income for their mortgage. The 2010 Census data reported the cost of living in Fresno is 21.5 percent less than the California average and 2.9 percent greater than the national average.

Table 2-31 summarizes 2015 HCD-defined household income limits for very low-, low-, and moderate-income households in Fresno County by the number of persons in the household. The table also includes the maximum affordable monthly rents and maximum affordable purchase prices for homes. Households earning the 2014 area median income for a family of four in Fresno County (\$57,900) could afford to spend up to \$1,448 per month on rent without overpaying. A three-person household would be classified as low-income if its annual income was less than \$31,250. This household could afford a \$695 maximum monthly rent.

For renters this is a straightforward calculation, but home ownership costs are less transparent. An affordable price depends on several factors, including the down payment, the level of other long-term obligations (such as a car loan), and interest rates. In practice the interaction of these factors as well as insurance, and taxes allows some households to qualify for homes priced at more than three times their annual income, while other households may be limited to purchasing homes no more than two times their annual incomes. Interest rates, insurance, and taxes are held constant in Table 2-31 in order to determine maximum affordable rent and purchase price for households in each income category. It is important to note that this table is used for illustrative purposes only.

Housing is generally very affordable in Fresno County, relative to the rest of the State. The median home sale price in the city would be affordable to a four-person household earning the median income of \$57,900, as shown in Table 2-31. Even low- and very-low-income households may be able to afford a condominium or small housing unit. Rents are also affordable and as such based on the affordability levels even a low-income family of four can afford the city's median gross rent.

**Table 2-31: Fresno County Housing Affordability, 2014**

<b>Extremely Low-Income Households at 30% of 2014 Area Median Income (AMI)</b>						
<b>Number of Persons</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Income Level	\$12,150	\$13,900	\$15,650	\$17,350	\$18,750	\$20,150
Max. Monthly Gross Rent	\$304	\$348	\$391	\$434	\$469	\$504
Max. Purchase Price	\$49,077	\$56,146	\$63,214	\$70,081	\$75,736	\$81,391
<b>Very Low-Income Households at 50% of 2014 AMI</b>						
<b>Number of Persons</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Income Level	\$20,250	\$23,150	\$26,050	\$28,950	\$31,250	\$33,600
Max. Monthly Gross Rent	\$506	\$579	\$651	\$724	\$781	\$840
Max. Purchase Price	\$81,795	\$93,509	\$105,223	\$116,936	\$126,227	\$135,719
<b>Low-Income Households at 70% of 2014 AMI For Sale and 60% of 2014 AMI for Rental</b>						
<b>Number of Persons</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Income Level for Sale (70% AMI)	\$28,350	\$32,400	\$36,500	\$40,550	\$43,750	\$47,000
Income Level for Rental (60% AMI)	\$24,300	\$27,800	\$31,250	\$34,750	\$37,500	\$40,300
Max. Monthly Gross Rent	\$608	\$695	\$781	\$869	\$938	\$1,008
Max. Purchase Price	\$114,513	\$130,872	\$147,433	\$163,792	\$176,717	\$189,845
<b>Median-Income Households at 100% of 2014 AMI</b>						
<b>Number of Persons</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Income Level	\$40,550	\$46,300	\$52,100	\$57,900	\$62,550	\$67,150
Max. Monthly Gross Rent	\$1,014	\$1,158	\$1,303	\$1,448	\$1,564	\$1,679
Max. Purchase Price	\$163,792	\$187,018	\$210,445	\$233,873	\$252,656	\$271,236
<b>Moderate-Income Households at 110% of 2014 AMI</b>						
<b>Number of Persons</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Income Level	\$44,600	\$50,950	\$57,300	\$63,700	\$68,800	\$73,900
Max. Monthly Gross Rent	\$1,301	\$1,486	\$1,671	\$1,858	\$2,007	\$2,155
Max. Purchase Price	\$210,176	\$240,100	\$270,024	\$324,218	\$324,218	\$348,251

**Notes:**

Maximum Gross Rent assumes that 30 percent (35 percent for moderate) of income is available for either: monthly rent, including utilities; or mortgage payment, taxes, mortgage insurance, and homeowners insurance.

Maximum Purchase Price assumes 96.5 percent loan at 4.5 percent annual interest rate and 30-year term; assumes taxes, mortgage insurance, and homeowners insurance account for 21 percent of total monthly payments.

2014 State Area Median Income for Fresno County is \$57,900.

Source: California Department of Housing and Community Development, 2014; Fresno Multi-Jurisdictional 2015-2023 Housing Element

## CHAPTER THREE – LAND FOR HOUSING

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### Introduction

The Housing Element focuses on the social and economic concerns of residential development. Provision of housing sites and delivery of urban services are important facets of assessing the overall ability of a jurisdiction to meet housing needs. This Chapter identifies the land available to meet the City's housing need through 2023. More general population and policy information is available in the Fresno General Plan.

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



*CityView at Van Ness, completed in 2015*



## **Regional Housing Needs Allocation**

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

This Housing Element addresses the RHNA for two planning periods:

- The current RHNA planning period which spans 2013-2023
- The lower-income RHNA (referred to as the unaccommodated RHNA or rollover RHNA) from the previous planning period (2008-2013)

The unaccommodated RHNA from 2008-2013 rolled over to the current planning period because HCD found that the City did not make adequate sites available to accommodate the RHNA in the previous planning period.

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

The sites inventory included in this chapter is also divided into two parts. The first part presents sites to address the City's current (2013-2023) RHNA. The second part of the inventory presents sites to address the City's unaccommodated RHNA from the previous planning period (2008-2013) consistent with State law (Government Code Section 65584.09). The inventories are presented separately to facilitate tracking of sites throughout the planning period and due to the different criteria each inventory must address under housing element law. Together, the inventories show sufficient capacity to address the City's current (2013-2023) and previous (2008-2013) RHNA. No land use or zoning changes are proposed as part of this Housing Element update. The RHNA for each of the planning periods is discussed below.

### **2013-2023 RHNA (Current Planning Period)**

The current RHNA for the FCOG region covers an 11-year planning period (January 1, 2013 to December 31, 2023)<sup>1</sup> and is divided into four income categories: very low, low, moderate, and above moderate. As determined by FCOG, the City of Fresno's

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<sup>1</sup> The Housing Element planning period differs from the RHNA planning period. The Housing Element covers the planning period of December 31, 2015 through December 31, 2023.

allocation is 23,565 new housing units during this planning cycle, with the units divided among the four income categories as shown in Table 3-1.

**Table 3-1: Regional Housing Needs Allocation**

Income Category	No. Units Required	% Total
Extremely Low (0-30 percent AMI)*	2,833	12%
Very Low (31-50 percent AMI)	2,833	12%
Low (51-80 percent AMI)	3,289	14%
Moderate (81-120 percent AMI)	3,571	15%
Above Moderate (>120 percent AMI)	11,039	47%
<b>Total Units Needed</b>	<b>23,565</b>	<b>100%</b>

Source: Fresno Council of Governments, 2014

AMI = Area Median Income

\* Note: Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation. Therefore, the City's very low-income RHNA of 5,666 units is split into 2,833 extremely low-income and 2,833 very low-income units.

### ***Progress toward the 2013-2023 RHNA***

Since the RHNA uses January 1, 2013 as the baseline for growth projections for the 2013-2023 RHNA planning period, jurisdictions may count toward the RHNA housing units developed, under construction, or approved since January 1, 2013. Consistent with Housing Element law (specifically HCD guidance on AB1233 which allows the City to subtract the number of units approved or constructed since the beginning of the previous planning period's baseline date), credits for housing units permitted from 2013 to 2015 are applied to the 2008-2013 unaccommodated RHNA, which is addressed in the next section. (There is an overlap of two years- 2013 to 2015- for the RHNA cycles.) To avoid double counting credits, only credits from 2016 are applied to the current 2013-2023 RHNA.

From January 1, 2016 to December 31, 2016, 1,387 units were approved or permitted (Table 3-2). After counting as credit the units with approved or issued permits, the remaining RHNA need for the 2013-2023 Planning Period is 22,178 units. Allocation of the remaining need by income category is shown in Table 3-2.

**Table 3-2: Credit Towards the 2013-2023 RHNA (2016 projects only)**

Development Approved/Permits Issued in 2016	Extremely and Very Low- Income (0-50% AMI)	Low-Income (51-80% AMI)	Moderate- Income (81- 120% AMI)	Above Moderate- Income (121%+ AMI)	Total
Various Single Family	--	--	--	923	<b>923</b>
Lowell Neighborhood	23	6	1	--	<b>30</b>
Lotus/Effie	--	2	--	--	<b>2</b>
Blackstone/McKinley*	68	22	1	--	<b>91</b>
Other Multi Family**	--	--	341	--	<b>341</b>
<b>Total Credits</b>	<b>91</b>	<b>30</b>	<b>343</b>	<b>923</b>	<b>1,387</b>
<b>2013-2023 RHNA</b>	<b>5,666</b>	<b>3,289</b>	<b>3,571</b>	<b>11,039</b>	<b>23,565</b>
<b>Remaining 2013-2023 RHNA</b>	<b>5,575</b>	<b>3,259</b>	<b>3,228</b>	<b>10,116</b>	<b>22,178</b>

Notes:

\*Affordability is based on a declaration of restrictions recorded on the property.

\*\*Affordability for multi-family development that do not have affordability restrictions in place is based on market rents and home sales prices in Fresno that are within the affordability range of both low- and moderate income households.

Source: City of Fresno, 2016

Included in the 2016 credits is the Blackstone/McKinley project that consists of 91 affordable multi-family units. Of the 91 units, 68 will be affordable to extremely low-/very-low income households, 22 will be affordable to low-income households, and one manager unit will have moderate-income level affordability based on market rate rents in the City. The development project is on a three-acre underutilized site that is currently used for auto repair and sales and used tire sales.

### Previous (2008-2013) RHNA Obligation

The City's previous Housing Element (2008-2013) committed to rezoning 500 acres of land to permit by-right residential development at a density of up to 20 units/acre and 200 acres to permit by-right residential development at a density of up to 38 units/acre. The expected capacity of the sites to be rezoned far exceeded the capacity needed to meet the 2008 RHNA and was a gross estimate based on anticipated potential associated with a future update to the General Plan. After a comprehensive update to the General Plan (Fresno General Plan, adopted in 2014), the City drafted a new Development Code, Zoning Map, and Downtown Development Code to establish residential densities of up to 45 units/acre in the Multi-Family High Density and Regional Mixed-Use districts, consistent with the Fresno General Plan. Densities in the Multi-Family Urban Neighborhood district and in the Corridor/Center Mixed-Use district were created to allow up to 30 units/acre. In the Downtown Development Code adopted in 2016, unlimited density standards were established in the three downtown designations. The Development Code updates resulted in significantly increased potential development capacity. Although the vacant residential land inventory under the newly adopted Development Code has a capacity in excess of the City's 2008 RHNA commitment, the rezoning was completed at the end of previous planning period, providing limited opportunities for development during the planning period, as required by Housing Element law.

If a jurisdiction failed to make adequate sites available to accommodate the RHNA in the previous planning period, AB 1233 (Government Code Section 65584.09) requires the jurisdiction to identify and *if necessary* rezone sites in the first year of the current planning period to address the unaccommodated lower-income RHNA from the previous planning period. This requirement is in addition to the requirement to identify other specific sites to accommodate the RHNA for the current planning period. The City may not count capacity on the same sites for both planning periods. The City of Fresno must carry over 3,172 extremely- and very low-income units and 3,304 low-income units, for a total of 6,476 lower-income units from the 2008-2014 RHNA, as indicated by HCD in a letter to the City dated August 11, 2016 (corrected November 1, 2016).

**Table 3-3: Unaccommodated 2008 RHNA Obligation**

	Extremely and Very Low Income (0-50% AMI)	Low Income (51-80% AMI)	Moderate Income (81- 120% AMI)	Above Moderate Income (121%+ AMI)	Total
2008 RHNA	4,912	3,304	3,651	9,100	20,967
Credits from the 2008 Housing Element and 2009 Housing Element Amendment (as approved by HCD)	1,740*	--	--	548*	2,288
Remaining 2008 RHNA	3,172	3,304	3,651	8,552	
Unaccommodated 2008 Lower-Income RHNA**	6,476		N/A		

Notes:

\*Includes only credits approved by HCD.

\*\*If a jurisdiction failed to make adequate sites available to accommodate the RHNA in the previous planning period, AB 1233 (Government Code Section 65584.09) requires only the lower income RHNA to be rolled over to the subsequent planning period.

### ***Progress Towards the 2008-2013 RHNA***

Because the 2008 RHNA used January 1, 2006 as the baseline for growth projections for the planning period, the City may count toward the 2008 RHNA housing units developed, under construction, or approved since January 1, 2006. Consistent with Housing Element law and guidance from HCD, credits for housing units built, approved, or permitted up until December 31, 2015 are applied to the 2008 unaccommodated RHNA. To avoid double counting credits, credits for housing units developed, under construction, or approved in 2016 only are applied to the 2015 RHNA (see previous section).

From January 1, 2006 to December 31, 2015, 1,603 lower-income units were approved or permitted (Table 3-4). After counting as credit the units with approved/entitled or issued permits, the remaining unaccommodated lower-income RHNA for the 2008-2013

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planning period is 4,873 units. Allocation of the remaining unaccommodated need by income category is shown in Table 3-4.

**Table 3-4: Credit Towards the Unaccommodated 2008-2013 RHNA**

Development Approved/Permits Issued by Year	Extremely and Very Low-Income (0-50% AMI)*	Low-Income (51-80% AMI)*	Moderate- Income (81- 120% AMI)	Above Moderate- Income (121%+ AMI)	Total
<b>2006</b>					
Various Single Family (Affordable)	--	21	--	--	<b>21</b>
Sierra Gateway I Senior Residence	79	--	--	1	<b>80</b>
Brierwood Court	22	51	--	2	<b>75</b>
Various Single Family/Multi Family (Market Rate)	--	--	--	1,982	<b>1,982</b>
<i>2006 Subtotal</i>	<i>101</i>	<i>72</i>	<i>--</i>	<i>1,985</i>	<i>2,158</i>
<b>2007</b>					
Various Single Family (Affordable)	1	19	--	--	<b>20</b>
Village at Kings Canyon	11	37	--	--	<b>48</b>
Geneva Village	28	111	--	3	<b>142</b>
H Street Lofts	--	--	6	20	<b>26</b>
Various Single Family/Multi Family (Market Rate)	--	--	--	2,164	<b>2,164</b>
<i>2007 Subtotal</i>	<i>40</i>	<i>167</i>	<i>6</i>	<i>2,187</i>	<i>2,400</i>
<b>2008</b>					
Various Single Family (Affordable)	1	13	--	--	<b>14</b>
Oak Park Senior Villas	32	32	--	1	<b>65</b>
Vagabond Lofts	--	--	9	29	<b>38</b>
Various Single Family/Multi Family (Market Rate)	--	--	--	1,563	<b>1,563</b>
<i>2008 Subtotal</i>	<i>33</i>	<i>45</i>	<i>9</i>	<i>1,593</i>	<i>1,680</i>
<b>2009</b>					
Various Single Family (Affordable)	8	13	2	--	<b>23</b>
Tanager Springs I	37	37	--	--	<b>74</b>
Tanager Springs II	39	39		2	<b>80</b>
Fultonia	--	8	--	31	<b>39</b>
Fulton Village	--	--	13	48	<b>61</b>
Broadway Lofts			5	17	<b>22</b>

**Table 3-4: Credit Towards the Unaccommodated 2008-2013 RHNA**

Development Approved/Permits Issued by Year	Extremely and Very Low-Income (0-50% AMI)*	Low-Income (51-80% AMI)*	Moderate- Income (81- 120% AMI)	Above Moderate- Income (121%+ AMI)	Total
Summer Hill Place	35	14	--	1	<b>50</b>
Mayflower Lofts	--	--	-	18	<b>18</b>
Various Single Family/Multi Family (Market Rate)	--	--	--	1,257	<b>1,257</b>
<b>2009 Subtotal</b>	<b>119</b>	<b>111</b>	<b>20</b>	<b>1,374</b>	<b>1,624</b>
<b>2010</b>					
Van Ness	--	3	2	15	<b>20</b>
Trinity	20	--	--	1	<b>21</b>
Parc Grove Commons	67	146	--	2	<b>215</b>
Iron Bird Lofts	--	--	16	48	<b>64</b>
Various Single Family/Multi Family (Market Rate)	--	--	--	997	<b>997</b>
<b>2010 Subtotal</b>	<b>87</b>	<b>149</b>	<b>18</b>	<b>1,063</b>	<b>1,317</b>
<b>2011</b>					
Various Single Family (Affordable)	4	--	--	--	<b>4</b>
Renaissance at Santa Clara	69	--	--	1	<b>70</b>
Bridges at Florence	18	15	--	1	<b>34</b>
Various Single Family/Multi Family (Market Rate)	--	--	--	1,095	<b>1,095</b>
<b>2011 Subtotal</b>	<b>91</b>	<b>15</b>	<b>--</b>	<b>1,097</b>	<b>1,203</b>
<b>2012</b>					
Various Single Family (Affordable)	5	--	--	--	<b>5</b>
Various Single Family/Multi Family (Market Rate)	--	--	--	3,248	<b>3,248</b>
<b>2012 Subtotal</b>	<b>5</b>	<b>--</b>	<b>--</b>	<b>3,248</b>	<b>3,253</b>
<b>2013</b>					
Fulton West/Cedar Heights	34	10	1	--	<b>45</b>
Sierra Gateway II	33	34	--	1	<b>68</b>
Parc Grove NW	121	26	--	--	<b>147</b>
CityView	3	41	--	--	<b>44</b>
Laval/Belgravia Street	--	9	--	--	<b>9</b>
415 Calaveras	--	1	--	--	<b>1</b>
Various Single Family	--	--	--	924	<b>924</b>
Various Multi Family**	--	--	50	--	<b>50</b>

**Table 3-4: Credit Towards the Unaccommodated 2008-2013 RHNA**

Development Approved/Permits Issued by Year	Extremely and Very Low-Income (0-50% AMI)*	Low-Income (51-80% AMI)*	Moderate-Income (81-120% AMI)	Above Moderate-Income (121%+ AMI)	Total
<b>2013 Subtotal</b>	191	121	51	925	1,288
<b>2014</b>					
Plaza Mendoza	13	117	2	--	<b>132</b>
Pacifica SW Lofts	--	--	--	4	<b>4</b>
Various Single Family	--	--	--	566	<b>566</b>
Various Multi Family**	--	--	285	--	<b>285</b>
<b>2014 Subtotal</b>	13	117	287	570	<b>987</b>
<b>2015</b>					
Fresno Edison Apts.	43	10	2	--	<b>55</b>
Fresno Edison Apts. II	43	20	--	--	<b>63</b>
South Fulton****	10	--	40	1	<b>51</b>
Various Single Family	--	--	--	833	<b>833</b>
Various Multi Family**	--	--	44	--	<b>44</b>
<b>2015 Subtotal</b>	96	30	86	834	<b>1,046</b>
<b>Total Credits</b>					
	776	827	477	14,876	<b>16,956</b>
<b>Unaccommodated Lower Income 2008 RHNA***</b>	3,172	3,304	NA	NA	<b>6,476</b>
<b>Remaining Unaccommodated Lower Income 2008 RHNA</b>	<b>2,396</b>	<b>2,477</b>	<b>NA</b>	<b>NA</b>	<b>4,873</b>

Notes:

Credits from 2006 to 2012 are based on building/permitting activity report from Annual Housing Element Progress Reports with edits made in 2017 to ensure accuracy (e.g. correcting discrepancies and identifying units that were credited in subsequent years).

\*Affordability for units in the Extremely/Low- and Low-Income columns is based on a declaration of restrictions recorded on the property (deed restricted) to ensure affordability.

\*\*Affordability for multi-family development that do not have affordability restrictions in place is based on market rents and home sales prices in Fresno that are within the affordability range of both low- and moderate income households.

\*\*\*If a jurisdiction failed to make adequate sites available to accommodate the RHNA in the previous planning period, AB 1233 (Government Code Section 65584.09) requires only the lower income RHNA to be rolled over to the subsequent planning period.

\*\*\*\* This is the only project in the list that has an approved entitlement permit, but does not yet have a building permit.

Source: City of Fresno, 2017

## Residential Land Inventory

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the region's projected growth (RHNA). HCD found that the City did not make adequate sites available to

accommodate the RHNA in the previous planning period (2008-2013) and as such, that unaccommodated RHNA must be addressed in this Housing Element. The remainder of this Chapter will describe two residential land inventories:

- 2013-2023 (current Housing Element cycle)
- 2008-2013 (previous Housing Element cycle %ollover+)

As stated earlier, the inventories are presented separately to facilitate tracking of sites throughout the planning period and due to the different criteria each inventory must address under housing element law.

### **Section I: Residential Land Inventory (2013-2023 RHNA)**

Fresno has many mostly vacant residential development opportunities with sufficient capacity to meet and exceed the identified housing need for 2013-2023 (Figure 3-2). The opportunities shown in this inventory consist of vacant land in residential, mixed-use sites, and commercial districts that allow residential development. Cap-and-Trade sites, pending project sites, and underutilized sites also provide opportunities for residential development. Altogether, these sites ensure that adequate sites beyond the remaining RHNA are provided for in the planning period. No identified constraints on these sites would prevent development or reuse during the Housing Element period. Sites to meet the 2008-2013 RHNA are presented separately in the next section.

#### ***Land Inventory Considerations***

##### ***Realistic Capacity***

Consistent with HCD Guidelines, the methodology for determining realistic capacity on each identified site must account for land use controls and site improvements. Minimum allowed densities are used to calculate realistic capacity for most of the sites included in the land inventory (consistent with California Government Code 65583.2[c][1]). The Fresno General Plan and Development Code establish minimum densities in most residential and mixed-use designations and districts. The land use regulations provide a range of densities for single-family (up to 12 units/acre, without density bonus), multi-family (up to 45 units/acre, without density bonus), and mixed-use (up to 45 units/acre, without density bonus) to accommodate a range of housing options. Two commercial districts (CMS-Commercial Main Street and CR-Commercial Regional) allow for stand-alone residential development at densities of up to 16 units/acre. The commercial districts do not have a minimum density; thus, realistic minimum densities are calculated at 75 percent of the maximum allowed density to calculate a realistic capacity for those sites. Sites for the two commercial districts make up only a very small portion (two percent) of the entire sites inventory to meet the 2013-2023 RHNA.

Due to the very-low-density nature of the RS-1 and RS-2 residential single-family districts (allowing up to 1.2 and 2.2 units/acre, respectively), maximum densities have been used to calculate capacity for those districts.



Overall, the general use of minimum densities provides a very realistic, and perhaps somewhat conservative, approach, as many developments in Fresno can achieve much higher densities through development at the maximum density range, and even more density through the City's affordable housing and Transit Oriented Development (TOD) density bonus programs.

To calculate realistic capacity on mixed-use sites, the City again took a conservative approach based on minimum densities allowed in the newly adopted Development Code. Minimum densities for land zoned for mixed-use are 12 units/acre for Neighborhood Mixed-Use (NMX), 16 units/acre for Corridor/Center Mixed-Use (CMX), and 30 units/acre for Regional Mixed-Use (RMX). Minimum densities do not apply on sites smaller than 20,000 square feet in size, located farther than 1,000 feet from a planned or existing Bus Rapid Transit (BRT) route, or for which a Development Permit application was submitted prior to January 1, 2019. Nevertheless, Table 3-5 indicates that in the past three years, mixed-use densities on approved projects have averaged about 45 units/acre, including two projects achieving over 60 units/acre on sites less than one acre in size. Specifically, one development on a lot smaller than 20,000 square feet was able to achieve 118 units per acre. The CityView development at Van Ness Avenue and Inyo Avenue is owned and managed by the Fresno Housing Authority and consists of 45 affordable workforce housing units in a mixed-use setting.

**Table 3-5: Mixed-Use Development Trends**

Address	Description	Acres	# of Units	Density	Year Approved
Van Ness and Inyo Avenues (CityView)	Mixed-Use Residential	0.38	45	118	2012
541/ 545 North Fulton Street	Mixed-Use Residential	0.81	30	37	2013
1502/1560 Fulton St./1505 Van Ness Ave.	Condominium Mixed-Use	2.3	80	35	2013
120 North Fulton Street	Mixed-Use Residential	0.73	23	32	2015
1001-1011 North Blackstone Ave.	Mixed-Use Residential	0.24	2	8	2015
829/835 Fulton and Inyo Street	Mixed-Use Residential	0.79	50	63	2015
Developer, Upside Enterprises, LLC	Commercial/Residential Mixed-Use	1.46	70	48	Proposed in 2015
<b>Total</b>		<b>6.71</b>	<b>300</b>	<b>45</b>	

Source: City of Fresno, 2015

Mixed-use sites in the 2013-2023 Sites Inventory account for only 29 percent of all residential capacity identified. For the mixed-use designations, residential stand-alone uses are allowed by right, and minimum densities are established to ensure that development is consistent with the character and density established in the Fresno Development Code. The mixed-use designations have a minimum density and call for mandatory residential uses in addition to commercial development. However, a five-

year grace period applies, allowing stand-alone commercial in these zones on lots less than 20,000 SF in area, projects farther than 1,000 feet from a planned or existing BRT route, and projects for which a Development Permit application is submitted prior to January 2019. The Commercial Main Street (CMS) and Commercial Regional (CR) zone districts allow stand-alone commercial development.

Recent development trends in Fresno reflect a high demand for residential development, which has resulted in developments that emphasize residential development over exclusively non-residential developments. Most mixed-use projects that have been approved or are in the development process are primarily residential, with just enough ground-floor retail to occupy the ground floor. All of the developments listed in Table 3-5 follow this development pattern (primarily residential). For example, the CityView project included a gym/health club on the ground floor, and the 541/545 North Fulton Street and 120 North Fulton Street projects included live/work units as the non-residential component. The 829/835 Fulton Street project proposes several small commercial tenants such as a café and restaurant. Even with the provision of ground-floor commercial space, most of these developments have been able to achieve or exceed the maximum allowable residential densities, further demonstrating the strength of residential development over commercial development in Fresno. Staff anticipates that this trend will continue, and land zoned for mixed use will achieve residential densities at or above the maximum allowed (as shown on Table 3-5).

To further incentivize mixed-use development, the City has established a Transit-Oriented Development (TOD) Height and Density Bonus which can double the allowed maximum density for a site. The purpose of the TOD Height and Density Bonus is to provide flexibility for projects that promote walkability, livability, and transit ridership near stations for BRT and other enhanced transit service. The TOD height and Density Bonus may be used in combination with an Affordable Housing Density Bonus. For qualifying project sites, the bonus height may exceed the Base District height by 25 percent. The bonus density may exceed that of the Base District by 100 percent. The City allows a project to exceed the maximum height and/or the maximum residential density of the Base District if all three of the following criteria are met:

- The project site is located entirely within an MX District.
- The project site is located within 500 feet of an existing or planned Bus Rapid Transit station or a station for a similar enhanced transit service as determined by the Review Authority.
- The project will provide one of the following public benefits:
  - A Public Plaza; or
  - Qualifying public art; or
  - 90 percent or greater frontage coverage along the street which features the BRT route or other enhanced transit route.

### *Downtown Sites*

In 2016, the City adopted the Downtown Development Code (DDC), an amendment to the Citywide Development Code, which put into place criteria to encourage the

development of Fresno's downtown. The DDC presents a new set of development standards that allow a range of development types and offer very clear and detailed parameters that establish a high degree of predictability in the project review process. Three new zoning districts have been created for the urban core of Downtown: DTC- Downtown Core, DTG- Downtown General, and DTN- Downtown Neighborhood. Most sites in the Downtown area are included in the 2008-2013 Residential Land Inventory presented in the next section, along with more detailed information about the DDC and the expected densities in Downtown. Only a few sites are included in this 2013-2023 inventory; capacity from these sites represents less than two percent of the total land inventory to meet the 2013-2023 RHNA. To promote infill development within the core, priority processing is available for the construction of new housing in the Downtown Planning Area. This includes the processing of completed plans, consistent rezoning, and Development and Conditional Use Permit applications for permitting within an average of 75 working days. In the Inner City Area, the City provides reduced application fees and priority processing for single- and multi-family projects. Some Downtown sites in focused areas require a small retail component on the ground floor to enhance the walkability of Downtown and provide amenities for residents. The DDC standards have established an exciting opportunity for redevelopment and intensification with the removal of density limits and allowing building heights up to 15 stories.

#### *Densities Appropriate for Accommodating Lower Income Housing*

The capacity of sites that allow development densities of at least 30 units/acre are credited toward the lower-income RHNA, pursuant to State law. The California Government Code states that if a local government has adopted density standards consistent with the population based criteria set by State law (at least 30 units/acre for the City of Fresno), State HCD is obligated to accept sites with those density standards (30 units/acre or higher) as appropriate for accommodating the jurisdiction's share of regional housing need for lower-income households. Per Government Code Section 65583.2(c)(3)(B), the RM-2 Multi-Family Urban Neighborhood, RM-3 Multi-Family High Density, three downtown districts (DTC Downtown Core, DTG Downtown General, and DTN Downtown Neighborhood), and two mixed-use designations (CMX Corridor/Center Mixed-Use and RMX Regional Mixed-Use) are consistent with the default density standard (30 units/acre) for metropolitan jurisdictions such as Fresno. Therefore, these parcels are considered appropriate to accommodate housing for lower-income households consistent with Government Code Section 65583.2(c)(3)(B).

Sites zoned at 12 to 16 units/acre are credited towards the moderate-income RHNA as the market rents in Fresno are within the affordability range of low- and moderate-income households. A sampling of rents for multi-family developments that were developed at the 12 to 16 units/acre range show that one-bedroom unit monthly rents are in the high \$600s and two-bedroom unit rents range from \$815 to \$1,297.<sup>2</sup> The weighted average for rents in the developments sampled was \$1,022. Comparing these rents to the housing affordability levels presented in Table 2-33 of this Housing Element

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<sup>2</sup> City of Fresno, November 2015.

confirms that the rents are affordable to low- and moderate-income households. Specifically, one-bedroom units are affordable to smaller, low-income families (up to 70 percent of the Area Median Income), and two-bedroom units are affordable to some lower-income households. All moderate-income households (up to 100 percent of the Area Median Income) can afford the rents.

#### *Suitability of Small and Large Sites*

Development of parcels of at least one acre in size is desirable in terms of construction economies and effective use of State or federal grants. However, in older parts of the city, the subdivision pattern has resulted in many lots under one acre in size. The Sites Inventory includes 431.7 acres of vacant and underutilized sites that are less than one acre in size (representing just 9.9 percent of all residential capacity on vacant and underutilized sites). Small sites present the opportunity for development on the existing sites or lot consolidation into larger projects. Many opportunities for lot consolidation exist on surrounding identified sites, but because this sites inventory focuses primarily on vacant land, underutilized or underdeveloped properties adjacent to the sites are not often identified. In Fresno, residential developments on sites of less than acre in size are common. Table 3-5 lists recent mixed-use developments, five of which were developed on lots less than one acre in size. The CityView development was developed on a lot just over one-third of an acre in size and was able to achieve 45 units at a density of 118 units per acre. Of the 21 multi-family developments approved since 2012, more than one-half (12 developments) had lot sizes of less than one acre in size. Residential development on sites of one acre or less have been, and continue to be, a key component of the City's housing production. To help improve residential development efficiency and increase housing production in central areas of Fresno, the City offers priority processing for new housing in the Downtown Planning Area and a TOD Height and Density Bonus for projects that promote walkability, livability, and transit ridership near stations for BRT and other enhanced transit service. To facilitate lot consolidation throughout the city, Fresno allows voluntary parcel mergers, which permit the combining of parcels without going through the parcel map or lot line adjustment process. In addition, to facilitate lot consolidation, the City has reduced the application fee from \$5,360 to \$627, which went into effect July 1, 2016.

The Sites Inventory includes 2,644 acres of vacant and underutilized sites that are over 10 acres in size (53.8 percent of all residential capacity on vacant and underutilized sites). To encourage a strategic approach to the development of large sites and to facilitate the development of housing, a new program in the Housing Plan encourages the development of large sites through the phasing of development and related public improvements, and where applicable, through the Specific Plan process.

**Table 3-6: Summary of Residential Sites Inventory (2013-2023 RHNA)**

Unit Capacity	Income Category				Total
	Extremely/ Very Low	Low	Moderate	Above Moderate	
Vacant Residential Sites	5,569	--	3,979	13,457	23,005
Vacant Non-Residential Sites (Mixed Use or Commercial)	8,433	--	1,229	--	9,662
Underutilized Residential Sites	143	--	--	162	305
Underutilized Non-Residential Sites (Mixed Use or Commercial)	1,063	--	25	--	1,088
Cap and Trade Fund Sites	440	--	--	--	440
Potential Infill Project Sites	--	--	483	--	483
<b>Total</b>	<b>15,648</b>	<b>--</b>	<b>5,716</b>	<b>13,619</b>	<b>34,983</b>

### ***Residential Land Inventory (2013-2023) Summary***

#### ***Vacant Land Inventory***

Identification of vacant residential and mixed-use land was based on the 2008 Housing Element sites inventory, with developed and non-viable sites removed and additional sites identified. The sites inventory is limited to sites that are at least one-eighth of an acre in size. The inventory of vacant residential and mixed-use land (including sites in the BRT corridors) totals 4,318.5 acres. These vacant properties, summarized in the first two rows of Table 3-6, have the potential to yield 32,667 units. (See Appendix B for detailed sites table, including parcel-specific information.) Vacant land in the higher-density multifamily residential districts, Downtown districts, and mixed-use districts have capacity for over 14,002 units at densities appropriate for accommodating lower-income housing (at least 30 units/acre). The commercial and mixed-use districts that are represented in the vacant sites inventory allow single-family and multi-unit residential development by right, either alone or in combination with other permitted uses. The capacity for close to 5,208 units on vacant land is provided in several designations that allow 12 to 16 units/acre and are credited towards the moderate-income RHNA. There is capacity for 13,457 above moderate-income units in the single-family residential districts, primarily on vacant land in the RS-4 and RS-5 districts. While several vacant sites are designated for Residential Estate, no capacity is identified on those sites due to the very low density nature of the district, combined with the size of the sites. Those sites are included in the sites inventory and on the sites inventory map, as they present opportunities for consolidation into larger developments in the future.

The City of Fresno's newly adopted Development Code includes three mixed-use districts. One of the key goals in the mixed-use districts is to facilitate mixed-use residential development at increased densities and intensities in key locations such as along BRT corridors. The City incentivizes development along BRT corridors through the Transit-Oriented Development Height and Density Bonus. This density bonus provides flexibility for projects that promote walkability, livability, and transit ridership near stations for BRT and other enhanced transit service. The sites inventory identifies vacant sites with a minimum capacity for 1,745 units located within a BRT corridor.

### *Underutilized Sites*

In addition to vacant sites, future housing units can be accommodated on underutilized lots currently developed at less than the maximum permitted density. Many of the identified sites are located in areas intended for high-density development, yet the sites are developed with single-family homes or older and vacant commercial or industrial buildings. While many more underutilized land opportunities exist in Fresno, the sites included in the inventory have been specifically selected due to their high potential for redevelopment based on current uses, allowed densities, and local development trends. The sites inventory includes 51 acres of underutilized residential properties with the potential for development of at least 1,393 dwelling units (1,368 units on properties with appropriate densities to facilitate lower-income housing). Appendix B identifies the underutilized sites and provides a detailed description of current uses.

### *Cap and Trade Funds Sites*

The Budget Act of 2014 appropriated \$130 million from the Greenhouse Gas Reduction Fund (GGRF) to develop and implement the Affordable Housing and Sustainable Communities (AHSC) Program. Accompanying legislation (SB 862) apportions 20 percent of GGRF annual proceeds to the AHSC that began in FY 2015-16. The GGRF is sometimes referred to as the %Cap and Trade Fund.+ The AHSC funds land use, housing, transportation, and land preservation projects to support infill and compact development that reduces greenhouse gas (GHG) emissions. These projects facilitate the reduction of the emissions of GHGs by improving mobility options and increasing infill development, which decrease vehicle miles traveled and associated greenhouse gas and other emissions, and by reducing land conversion, which would result in emissions of greenhouse gases. The program awards are determined with a points formula; 0.25 points are awarded to projects that directly implement a policy in a long-range planning document (General Plan/Specific Plan, etc.), including new development on sites in the housing element's sites inventory. In Fresno, two projects on underutilized and vacant sites, and still in the development process, may consider seeking Cap and Trade Funds:

- Fancher Multifamily and Fancher Senior Housing developments include 240 affordable multi-family and 200 affordable senior housing units. The 440 affordable units are approved and projected for development on a 91-acre vacant site.
- The Hotel Fresno Cap and Trade Fund site is presented in the next section under the 2008-2013 Residential Land Inventory.

### *Sites with Potential Infill Projects*

Six sites with potential development projects are included in the sites inventory. The sites are currently vacant or underutilized. The potential infill project sites are included although there is no certainty those units will be developed, as the proposals have not been approved. For sites where the developer has estimated the number of units that could be included, those estimates are used for realistic capacity. For projects with no

development proposals or estimates, realistic capacity for the sites based on minimum allowed density. In most cases the estimated capacity and density of the proposed projects exceed the minimum allowed by the site's zoning, and the actual capacity may be higher due to the maximum densities allowed. Since there is no guarantee that the projects will be approved or developed, using a realistic capacity ensures that in the case a proposed development falls through, the sites are still available to accommodate those identified units.

While the projects are proposed at densities that are appropriate to accommodate housing affordable to moderate- and lower-income households, the developers have not yet indicated if the projects will include affordable units and rent/mortgage costs are not yet known. As such, the units are allocated as affordable to moderate-income households, as are other multi-family units in this site's inventory that allow between 12 and 16 units per acre. These sites are often located in areas where the City's TOD height and density bonus would apply (effectively doubling the allowable density of a site), plus have the ability to access an affordable housing bonus. To provide a conservative inventory, the minimum densities are utilized to calculate capacity here. At a minimum, the six sites with potential infill projects can yield 483 units, mostly on sites with higher-density mixed-use zoning.

- The Blackstone/Olive potential infill project is estimated to provide 91 multifamily units on 1.89 acres at a density of 48 units per acre. The site allows densities of 12 to 16 units per acre by right, plus additional capacity through the provision of density bonuses. The site is partially vacant, with an empty commercial building and parking lot. The capacity for the site identified in this Housing Element is based on minimum allowed density: 23 units.
- The Blackstone/Clinton potential infill project is estimated to provide 122 multifamily units on 4.03 acres at a density of 30 units per acre (based on a preliminary developer proposal). The site is partially vacant with a few empty commercial and residential structures.
- The Van Ness/Stanslaus potential infill project is estimated to provide 70 multifamily units at a density of 42 units per acre. The site allows densities of 30 to 45 units per acre and is vacant.
- The South Stadium Phase 3 potential infill project is estimated to provide 141 multifamily units on a 2.69-acre site at a density of 52 units per acre (based on a preliminary developer proposal). The site is part of a multi-phase major residential and commercial mixed use around Chukchansi Park.
- The J.C. Penney potential infill project is estimated to provide 40 multifamily units on 0.55 acres at a density of 73 units per acre. The site allows densities of 30 to 45 units per acre (plus density bonuses). The housing units are expected to be developed within a vacant building. The minimum capacity for the site based on

minimum allowed density (and the capacity identified in this Housing Element) is 17 units.

- The 3143 E. Matoian Way potential infill project is a senior housing development at California State University, Fresno. While located adjacent to the university campus, the units will be designed as senior housing available to the public. The potential project is on 3.65 acres and has a density of 36 units per acre. Since the site is on land owned by the university, the development is not subject to the City's zoning regulations and therefore has no density requirements or restrictions. The minimum realistic capacity identified in this Housing Element (110 units) is based on 30 units per acre or 67 percent of maximum to reflect the typical minimum density for higher-density and mixed-use sites. The project is proposed by to include 130 units. The site is vacant.



**Table 3-7 Sites Inventory Summary Table (2013-2023 RHNA)**

Zoning	General Plan	Acres	Residential Density (du/ac) – Affordability Level	Down-town	BRT Corridors (Outside Downtown)	Est. Nbrhds North of Shaw	Est. Nbrhds South of Shaw	South Industrial Area	DA-1 North	DA-1 South	DA-2 North	DA-2 South	DA-4 West	Total Capacity
Residential Estate	Residential Low Density	3.57	0-0.2 Above Moderate	--	--	--	--	--	--	--	--	--	--	--
Residential Single Family, Extremely Low Density	Residential Low Density	11.85	0-1.2 Above Moderate	--	--	4	7	--	--	--	--	--	2	13
Residential Single Family, Very Low Density	Residential Low Density	13.23	0-2.2 Above Moderate	--	--	19	8	--	--	--	--	--	--	27
Residential Single Family, Low Density	Residential Low Density	106.85	0.2-3.5- Above Moderate	--	--	6	--	--	--	--	6	--	--	12
Residential Single Family, Medium Low Density	Residential Medium Low Density	1229.48	3.5-6 Above Moderate	--	--	707	1,168		276	1,654	271	260	1	4,337
Residential Single Family, Medium Density	Residential Medium Density/Downtown Neighborhoods	1,798.58	5-12 Above Moderate	671	--	1,097	2,796	5	2,810	1,422	--	--	267	9,068
Residential Multi-Family, Medium High Density	Residential Medium High Density	322.67	12-16 Moderate	--	--	1,743	1,273	--	697	158	--	--	--	3,871
Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	323.19	16-30 Very Low/Low	--	--	1,683	1,003	--	1,676	718	--	113	--	5,193
Residential Multi-Family, High Density	Residential High Density	22.70	30-45 Very Low/Low	--	--	158	--	--		523	--	--	--	681

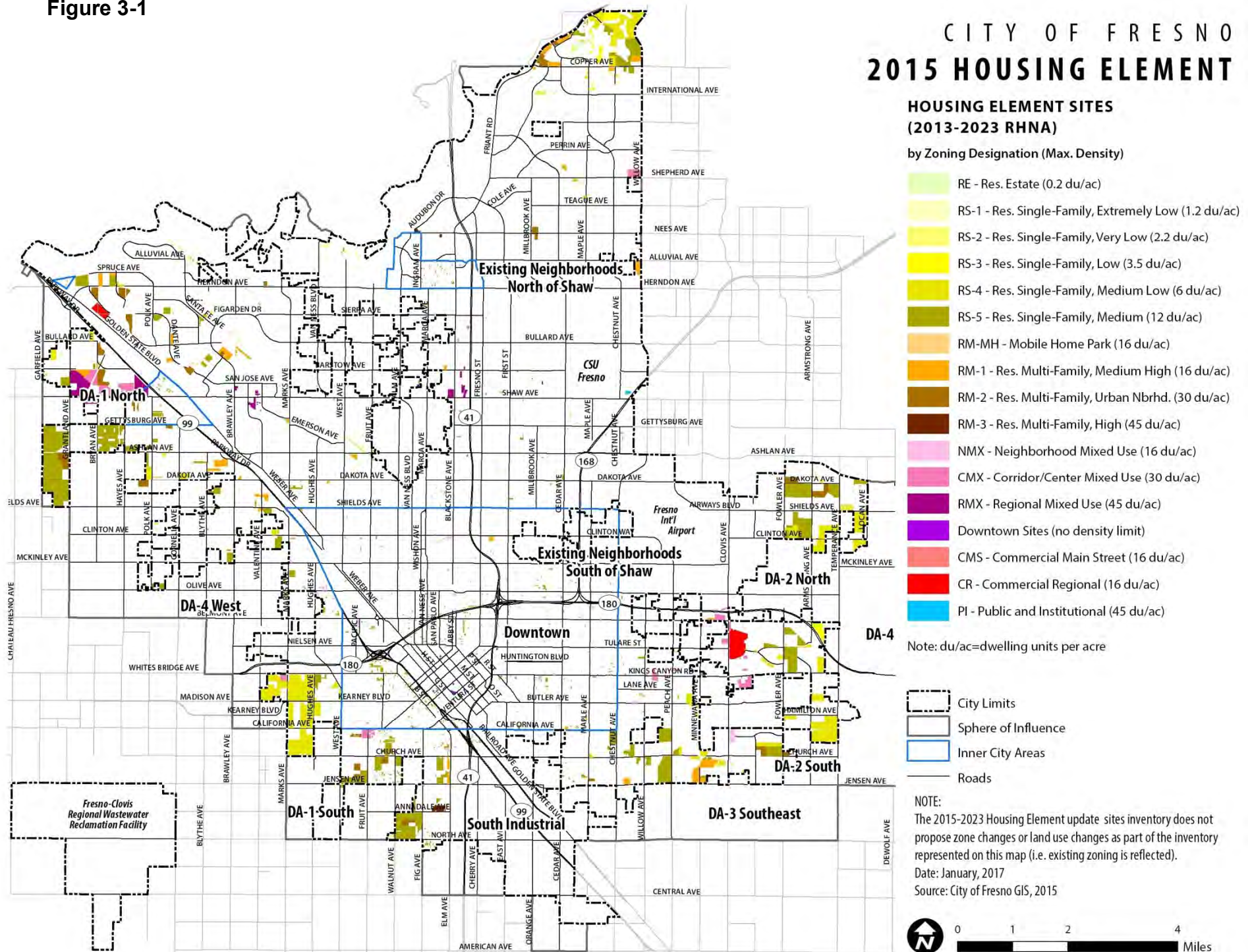
**Table 3-7 Sites Inventory Summary Table (2013-2023 RHNA)**

Zoning	General Plan	Acres	Residential Density (du/ac) – Affordability Level	Down-town	BRT Corridors (Outside Downtown)	Est. Nbrhds North of Shaw	Est. Nbrhds South of Shaw	South Industrial Area	DA-1 North	DA-1 South	DA-2 North	DA-2 South	DA-4 West	Total Capacity
Mobile Home Park	Residential Medium High Density	9.03	12-16 Moderate	--	--	--	--	--	--	--	--	--	108	108
Downtown Core	Downtown Core	3.26	No Density Limit Very Low/Low	158	--	--	--	--	--	--	--	--	--	158
Downtown Neighborhood	Downtown Neighborhood	4.38	No Density Limit Very Low/Low	409	--	--	--	--	--	--	--	--	--	409
Neighborhood Mixed Use	Downtown/ Mixed Use	78.16	12-16 Moderate	747	7	--	257	--	--	--	--	--	--	1,011
Corridor/ Center Mixed Use	Mixed Use Corridor/ Center	246.88	16-30 Very Low/Low	--	78	425	1,311	--	1,649	487	--	--	--	3,950
Regional Mixed Use	Mixed Use Regional	173.60	30-45 Very Low/Low	--	759	391	56	--	4,001	--	--	--	--	5,207
Commercial - Main Street	Commercial Main Street	7.10	12-16 Moderate	--	--	--	85	--	--	--	--	--	--	85
Commercial - Regional	Commercial Regional	116.30	12-16 Moderate	---	440	303	--	--	--	--	--	--	--	743
Public Institutional	Public Facility College	3.65	30-45 Project Based Affordability	--	--	110	--	--	--	--	--	--	--	110
<b>Total</b>		4,474.50		1,985	1,284	6,646	7,964	5	11,109	4,962	277	373	378	34,983

\*Notes:

1. The capacity of sites that allow development densities of at least 30 units per acre are credited toward the lower income RHNA based on State law, which obligates HCD to accept sites with this density standard (30 units/acre or higher) as appropriate for accommodating the jurisdiction's share of regional housing need for lower income households.
2. Sites zoned at 12 to 16 units/acre are credited toward the moderate income RHNA, as the market rents and home sales prices in Fresno are within the affordability range of moderate income families.
3. Affordability for Cap and Trade sites is based on affordability restrictions included in the submitted or approved development proposals.
4. Potential Infill Project units are allocated as affordable to moderate income households, as are other multi-family units in this sites inventory that allow between 12 and 16 units per acre.
5. No sites are identified in the DA-3 Southeast and DA-4 East Development Areas.

Figure 3-1



### *Adequacy of Sites to Meet the 2013-2023 RHNA*

The sites inventory indicates a capacity for 34,983 units, 15,648 of which occur on sites suitable for development of lower-income housing. Overall, Fresno has the ability to adequately accommodate, and significantly exceed, the current 2013-2023 RHNA. Table 3-8 summarizes the RHNA status.

**Table 3-8: Comparison of Sites Inventory and 2013-2023 RHNA**

Unit Capacity	Income Category				Total
	Extremely/ Very Low	Low	Moderate	Above Moderate	
Vacant Residential Sites	5,569	--	3,979	13,457	23,005
Vacant Non-Residential Sites (Mixed Use or Commercial)	8,433	--	1,229	--	9,662
Underutilized Residential Sites	143	--	--	162	305
Underutilized Non-Residential Sites (Mixed Use or Commercial)	1,063	--	25	--	1,088
Cap and Trade Fund Sites	440	--	--	--	440
Potential Infill Project Sites	--	--	483	--	483
<i>Total Site Inventory Capacity</i>	15,648	--	5,716	13,619	34,983
<b>Remaining 2013-2023 RHNA</b>	<b>5,575</b>	<b>3,259</b>	<b>3,228</b>	<b>10,116</b>	<b>22,178</b>
<b>Redistributed Surplus/Shortfall (+/-)</b>	<b>+6,814</b>		<b>+2,488</b>	<b>+3,503</b>	<b>+12,805</b>

## **Section II: Residential Land Inventory 2008-2013**

Because adequate sites were not available to accommodate the RHNA until the end of the previous planning period, AB 1233 (Government Code Section 65584.09) requires the identification or, if necessary, rezoning of sites, to address the unaccommodated lower-income RHNA from the previous planning period. The City of Fresno must carry over 6,476 lower-income units from the 2008-2014 RHNA, as indicated by HCD in a letter to the City dated August 11, 2016 (corrected November 1, 2016). Consistent with Housing Element law and guidance from HCD, credits for housing units built, approved, or permitted up until December 31, 2015 are applied to the 2008 unaccommodated RHNA. This leaves a rollover 2008-2013 RHNA of 4,873 lower-income units. The 2008-2013 rollover RHNA sites inventory included in this Housing Element has identified capacity for 5,541 units (exceeding the required rollover), 5,491 of which are on sites suitable for development of lower-income housing. There are no identified constraints on these sites that would prevent development or reuse during this Housing Element period.

### ***Land Inventory Considerations***

#### ***Rollover Requirements***

Housing element law (Government Code 65583.2[h]) requires that the City of Fresno accommodate all of the lower-income, unaccommodated RHNA on sites that are zoned

to permit owner-occupied and rental multifamily residential use by right (as defined in Government Code 65583.2[i]) during the planning period. These sites must permit at least 16 units per site at a density of at least 20 units per acre. At least half of the very low- and low-income housing need must be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted, except that a city or county may accommodate all of the very low- and low-income housing need on sites designated for mixed uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project. The sites included in the 2008-2013 sites inventory meet these criteria.

#### *Downtown Development Code (DDC)*

In 2016, the City adopted the Downtown Development Code (DDC) that put in place criteria to encourage development in Fresno's downtown. The intent of the DDC is to encourage infill development projects within the core that are compact and walkable, offer a mix of uses, and create a sense of place. Refocusing development within the core will draw people and business back into the heart of the community. Downtown infill development can also increase access to services and daily needs. Increasing the mix and density of uses within walking distance of homes and workplaces are both important strategies for creating "complete neighborhoods." Dense, mixed-use neighborhoods should include development that allows people to meet their everyday needs; buy healthy food; be physically active; and access jobs, education, and health care. Projects on infill sites have community-wide, environmental benefits because they can reduce development pressure on outlying areas, thereby helping to safeguard lands that serve important ecological functions. This development strategy also reduces travel miles, thereby improving air quality and reducing greenhouse gas emissions. Another benefit is the cleanup and reuse of formerly economically viable but now underutilized sites. This infill development approach is consistent with, and essential to implementing, the goals and objectives of the Fresno General Plan.

The DDC presents a new set of development standards that allow a range of development types. The DDC is based on best practices in downtown revitalization across the nation, but are tailored to Fresno's unique conditions. By offering very clear and detailed parameters, a high degree of predictability is introduced into the project review process. Standards that conventionally have been obstacles to urban infill—such as height limits, parking requirements, density limitations, and lot coverage restrictions—have been addressed in a way that makes projects which fit the community's vision very easy to obtain entitlements. Through this combination of factors, the DDC will attract investment that enhances Downtown and its neighborhoods.

Three new zoning districts have been created for the urban core of Downtown: DTC—Downtown Core, DTG—Downtown General, and DTN—Downtown Neighborhood. These new zoning districts are designed to create a vibrant, walkable, mixed-use metropolitan center. All other areas within the DDC are governed by zoning districts that already exist in the citywide Development Code. For example, sites along most major

streets are zoned NMX- Neighborhood Mixed Use. Specific development standards are included in the DDC that allow several specific sites to be used to address the unaccommodated RHNA from 2008 and comply with State law. The DDC establishes procedures for conducting a streamlined, ministerial process known as a Zone Clearance for projects meeting specific criteria. A Zone Clearance is used to verify that each new or expanded use or structure is consistent with the base zoning for DTC, DTG, and DTN, complies with all applicable requirements in the DDC and complies with any applicable policies or standards of the General Plan and any operative plans. Specifically, Downtown projects that meet all of the following criteria are considered consistent with the base zoning and can use the Zone Clearance process to confirm that construction is permitted as a matter of right and that such a project is being proposed in a manner compliant with, and without any deviations from, all applicable development standards prior to securing a Building Permit:

- Located within a Downtown District;
- Has a minimum of 16 total dwelling units in the project;
- Has a residential density of no less than 20 du/ac;
- Residential uses occupy 50 percent or more of the total floor area; and
- Has no historic resources or potential historic resources located on the site.

The new DDC standards allow for the development of fully residential projects and establish unlimited residential densities and intensity (floor-to-area ratio) in the three Downtown districts. Building heights up to 15 floors are allowed. Based on these new criteria, the 37.6 acres of land included in the 2008-2013 unaccommodated RHNA sites inventory meet the requirements of Housing Element law outlined in Government Code 65583.2(h). Projects that do not meet the criteria set forth above are considered exceptions to the base zoning and cannot be processed with a ministerial Zone Clearance. Instead, they will require a Development Permit, which is discretionary.

### *Realistic Capacity*

Consistent with State HCD Guidelines, the methodology for determining realistic capacity on each identified site must account for land use controls and site improvements. The Downtown Development Code establishes unlimited densities for the three Downtown Districts. To establish a realistic capacity for the Downtown sites, the City analyzed development trends within Downtown Fresno for residential projects over the past eight years, as well as currently proposed projects. Table 3-9 shows development activity in Downtown Fresno since 2008.

**Table 3-9: Downtown Fresno Development Trends**

Project Name	Year	# of Units	Site Size (Acres)	Density (du/ac)	Floors with Units	Current Zoning	Affordable Component?
<b>Completed Projects</b>							
Iron Bird Lofts	2008	80	2.22	<b>36.0</b>	3	DTN	Yes
H Street Artist Lofts	2009	26	0.69	<b>37.8</b>	2	DTN	Yes
Fulton Village	2010	46	1.12	<b>41.1</b>	3	DTN	Yes
Vagabond Lofts	2010	38	0.86	<b>44.1</b>	2	DTN	Yes
Van Ness Cottages	2011	20	1.00	<b>20.1</b>	2	NMX-AH	Yes
Bungalow Court	2012	8	0.30	<b>27.0</b>	2	DTN	Yes
Mayflower Lofts	2012	18	0.21	<b>87.1</b>	4	DTC	Yes
1612 Fulton	2013	30	0.97	<b>30.9</b>	2	DTN	Yes
Pearl Building	2013	8	0.17	<b>46.5</b>	2	DTN	No
Crichton Place	2014	28	1.66	<b>16.9</b>	2	DTN-AH	Yes
City Studios	2015	10	0.26	<b>38.7</b>	2	DTC	No
Brio on Broadway	2015	52	1.21	<b>43.1</b>	3	DTN	Yes
Courtyard Studios	2015	16	0.23	<b>68.5</b>	2	DTN	No
City View	2015	45	0.34	<b>130.7</b>	3	DTC	Yes
Lede	2016	85	2.32	<b>36.6</b>	3	DTN	Yes
<b>Under Construction</b>							
1752 L Street	TBD	4	0.12	<b>33.3</b>	2	DTN-AH	Yes
1743 L Street	TBD	16	0.34	<b>47.1</b>	2	DTN-AH	Yes
Pacific Southwest Building	TBD	44	0.40	<b>109.5</b>	11	DTC	No
<b>Proposed Projects</b>							
Hotel Fresno	TBD	79	0.55	<b>143.6</b>	4	DTC	Yes
South Stadium RFP	TBD	50	0.79	<b>63.3</b>	5	DTC	Yes

Note: DTC: Downtown Core; DTG: Downtown General; DTN: Downtown Neighborhood; AH: Apartment House Overlay  
Source: City of Fresno, 2016

Using the development project densities and number of residential floors presented in Table 3-9, the City conducted a housing capacity analysis to calculate the average units per acre per floor; the resultant figure is 18.9. Using this figure and the number of residential floors allowed in the Downtown districts, Table 3-10 shows the potential density for each district and the realistic density used to calculate the capacity for the Downtown sites. Based on the notable development history in Downtown Fresno and given the significant increase in building height and the unlimited densities established allowed by the newly adopted DDC, the assumption that new development may occur at densities listed in Table 3-9 represents a realistic and reasonable assumption. Consistent with State law, the capacity of the Downtown sites allows development



densities of at least 30 units/acre and are thus credited toward the lower income RHNA based on State law.

**Table 3-10: Potential Density Based on Average Units per Acre per Floor**

Zone District	Permitted Building Height (Floors)	Average Units per Acre per Floor	Potential Density Based on Average Units per Acre per Floor
<b>DTC--Downtown Core</b>	15	18.9	283
<b>DTG--Downtown General</b>	10	18.9	189
<b>DTN--Downtown Neighborhood</b>	6	18.9	113
<b>DTN-AH- Apartment House Overlay</b>	3	18.9	57

The General Plan policies for Downtown emphasize infill development and a revitalized central core area as the primary activity center for Fresno and the region by locating substantial growth in the Downtown and along the corridors leading to the Downtown. In an effort to promote infill development, priority processing is available for the construction of new housing in the Downtown Planning Area. This includes the processing of completed plans, consistent rezoning, and Development and Conditional Use Permit applications for permitting within an average of 75 working days. In the Inner City Area, the City provides reduced application fees and priority processing for single- and multifamily projects. Revitalization projects in the Downtown include the \$20 million Fulton Street Reconstruction Project that will reintroduce vehicular traffic to a six-block section of Downtown and create a complete street, including a pedestrian-friendly corridor. In addition, planning is nearly complete for the area of Downtown within one-quarter mile of the planned High Speed Rail Station, located at Mariposa and H Streets. Together, the Fulton Street and High Speed Rail Station area projects are expected to serve as catalysts for Downtown development.

### ***Residential Land Inventory (2008-2013) Summary***

The 2008-2013 sites inventory is made up of specifically chosen sites in Downtown Fresno that meet the rollover site criteria established by State law (Government Code 65583.2[h]), allow 100 percent residential development, and have a high potential for redevelopment. Except for three parcels in the Hotel Fresno site, none of the sites require non-residential uses. Downtown sites were targeted to leverage the policies that emphasize infill development and a revitalized central core. Under the newly adopted DDC, the sites included have no density limits and allow building heights up to 15 floors.

Three sites with potential development projects and one site that qualifies for Cap and Trade Funds (discussed previously in this chapter) are included in the sites inventory to meet the 2008-2013 RHNA. These sites are currently vacant or underutilized and have a high potential for redevelopment given the newly adopted DDC standards.



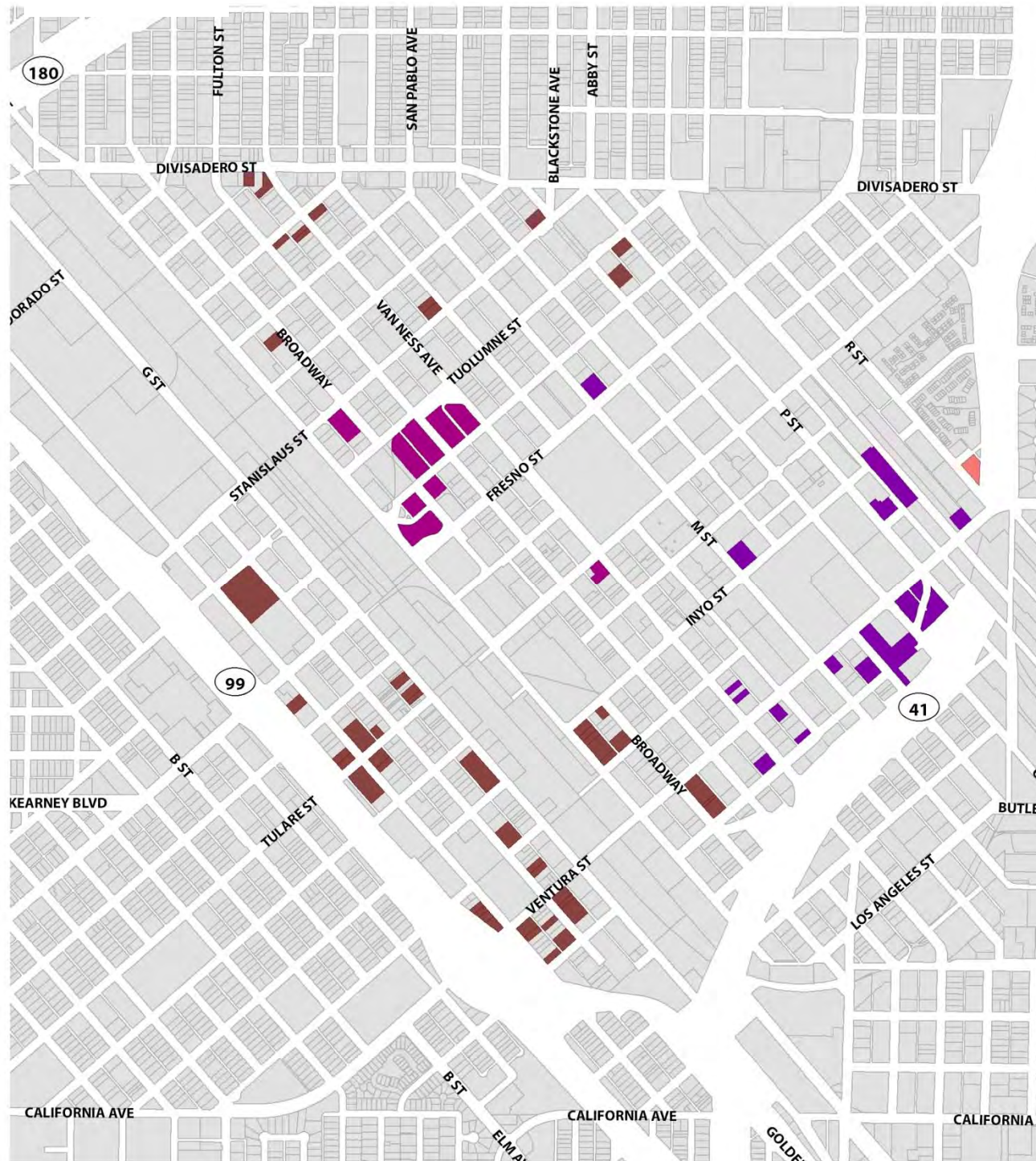
- The North Mall site occupies 5.3 acres in the Downtown Core (DTC) district. The site has no density limit, and the DDC allows building height up to 15 floors. As of 2016, the site was mostly used for parking, with two low-scale (one-floor) commercial buildings and a three-story office building. The site is significantly underdeveloped given the potential densities and heights that can be achieved under the newly adopted DDC. The site is made up of seven parcels, and only three of those parcels require ground-floor commercial use (and only about 20 percent of ground floor). For those parcels, capacity is not included in the 2008-2013 sites inventory. The minimum capacity for the site based on expected densities in Downtown Fresno is 773 units. There are currently no development plans for this site.
- The H & Inyo potential infill project is estimated to provide approximately 70 multifamily units on 1.33 acres at a density of 52.6 units per acre. The site is currently occupied by warehouse structures. The capacity for the site is based on preliminary discussions with a developer, although much higher capacity can be accommodated under the DDC.
- The M & Inyo potential infill project is estimated to provide 139 multifamily units on 0.74 acres at a density of 183 units per acre. The City-owned site is vacant and allows unlimited densities and up to 10 stories. There are currently no development plans for the site.
- The Hotel Fresno site has already been approved for Cap and Trade Funds. The Hotel Fresno is a vacant historic hotel on a 0.89-acre site. The rehabilitation project currently under development includes 79 multifamily units to be located on floors 2 through 7 of the vacant hotel. Of those units, 29 will be affordable to very low-income households, and 11 will be affordable to low-income households.

The 2008-2013 sites inventory identified capacity for 5,541 units, 5,491 of which are on sites suitable for development of lower-income housing. Less than Ten parcels in the inventory have a stand-alone capacity of fewer than 16 units. The parcels were included because they are adjacent to other parcels in the sites inventory and together comprise one site. No stand-alone sites with a capacity under 16 units were included in the inventory. Overall, parcels in Fresno have the ability to adequately accommodate, and exceed, the remaining unaccommodated 2008-2013 RHNA. Table 3-11 summarizes the RHNA status, Figure 3-2 shows the location of the sites, and Appendix B has a detailed listing of the sites to meet the unaccommodated need from the 2008-2013 RHNA.

**Table 3-11: Comparison of Sites Inventory and Remaining 2008-2013 RHNA**

Unit Capacity	Acres	Income Category				Total
		Extremely/ Very Low	Low	Moderate	Above Moderate	
Downtown Sites						
DTC--Downtown Core	2.6	734	--	--	--	734
DTG--Downtown General	9.4	1,779	--	--	--	1,779
DTN--Downtown Neighborhood	17.2	1,938	--	--	--	1,938
DTN-AH- Apartment House Overlay	0.5	29	--	--	--	29
Potential Infill Project/Cap and Trade Sites						
North Mall (DTC)	5.3	773	--	--	--	773
H & Inyo (DTN)	1.4	70	--	--	--	70
M & Inyo (DTG)	0.7	139	--	--	--	139
Hotel Fresno (DTC) (Cap and Trade Fund Site)	0.5	29	--	11	39	79
Total Site Inventory Capacity	37.6	5,491	--	11	39	5,541
Remaining Unaccommodated 2008 RHNA		2,396	2,477	N/A		4,873
Redistributed Surplus/Shortfall (+/-)		+618		N/A		+618

Figure 3- 2



# CITY OF FRESNO 2015 HOUSING ELEMENT

## HOUSING ELEMENT SITES (2008-2013 RHNA)

by Zoning Designation

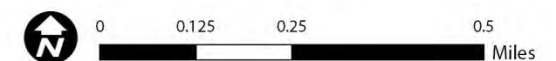
- Downtown Core (DTC)
- Downtown General (DTG)
- Downtown Neighborhood (DTN)
- DTN - Apartment House Overlay (DTN-AH)

### NOTE:

The 2015-2023 Housing Element update sites inventory does not propose zone changes or land use changes as part of the inventory represented on this map (i.e. existing zoning is reflected).

Date: January, 2017

Source: City of Fresno GIS, 2015

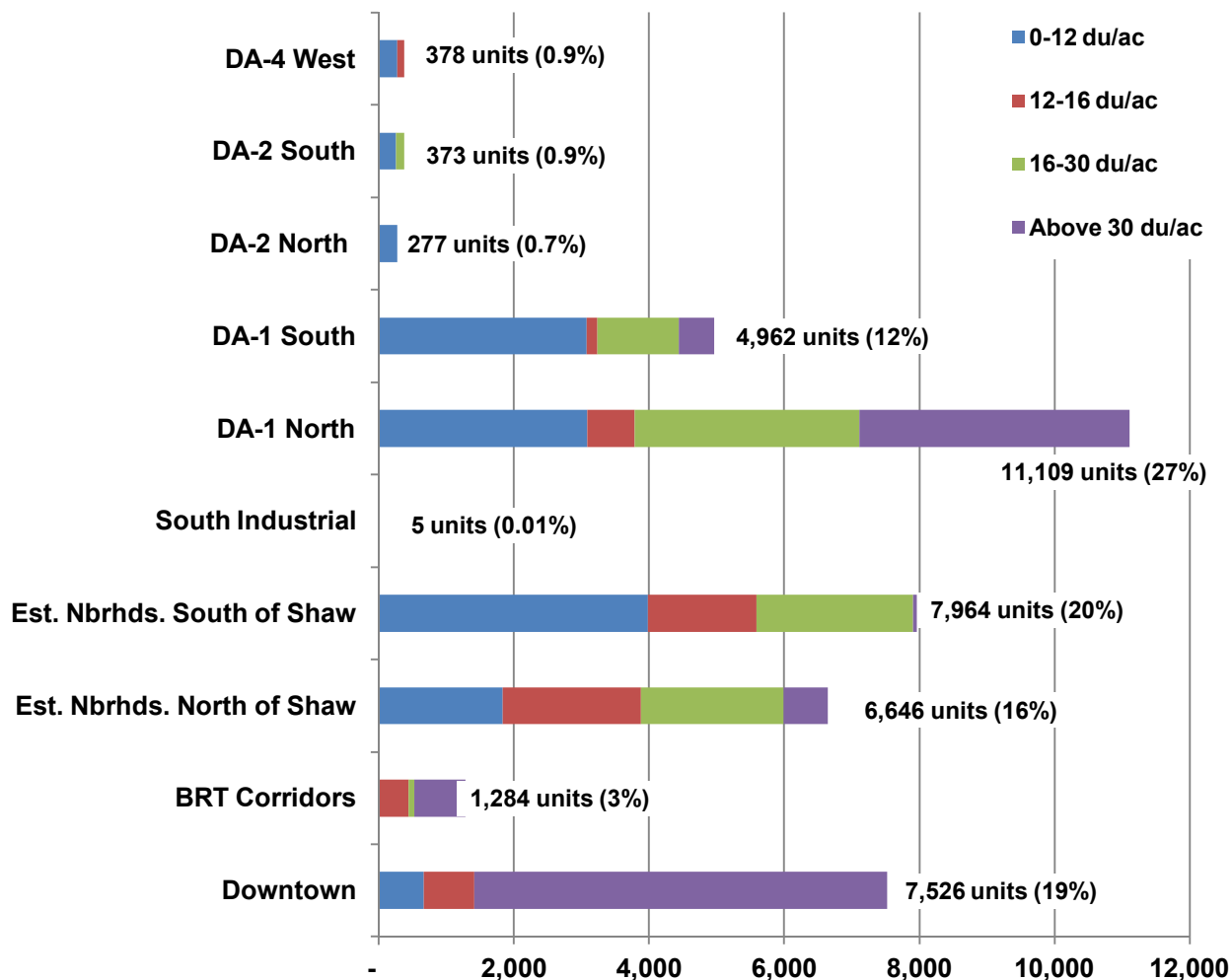


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## Residential Sites by Development Areas

Figure 3-3 shows the distribution of the sites by development area (for both the 2008-2013 and the 2013-2023 RHNA). Approximately 63 percent of the residential unit capacity is located in the three largest development areas (Established Neighborhoods North and South of Shaw and DA-1 North). Approximately 19 percent of sites are located in Downtown Fresno, and most of those sites are used to address the City's unaccommodated 2008-2013 RHNA.

**Figure 3-3: Sites Inventory Capacity by Development Area**



### ***Housing Site Distribution***

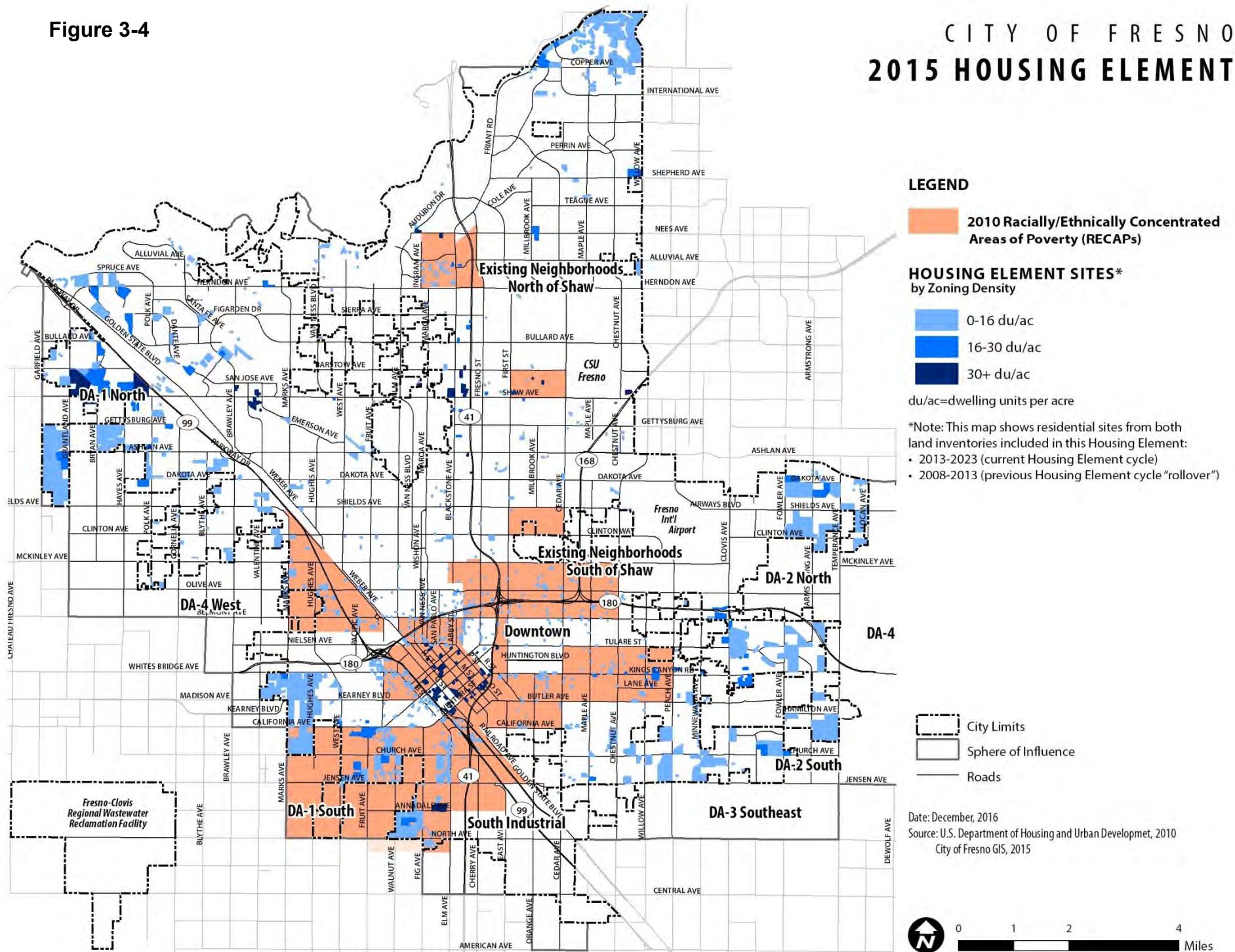
The 2014 San Joaquin Valley Fair Housing and Equity Assessment encourages local and regional jurisdictions to discuss how patterns of racial and ethnic distribution may contribute to disparities in access to housing, transit, education, healthcare, and economic prosperity. The report states that "achieving the stability of middle class depends on the ability to take small steps towards economic security, with each step supported and reinforced by quality education, accessible transportation, affordable housing, stable employment, and comprehensive healthcare. If any of these foundational components are missing or incomplete, the ladder of opportunity becomes less stable and secure."

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), the U.S. Department of Housing and Urban Development (HUD) has identified Census tracts with a majority non-White population (greater than 50 percent) and has a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area (in 2010), whichever threshold is lower. According to a recent report by the Brookings Institute, concentrated poverty has, for the most part, declined in the San Joaquin Valley. The report concluded that from 2000 to 2009, concentrated poverty in Stockton declined by five percent and in Fresno by nearly seven percent (San Joaquin Valley Fair Housing and Equity Assessment, 2014).

For the most part, the R/ECAPs are in more centralized parts of the City, where more public transportation options exist. The concentration of higher-density sites in the core areas corresponds with General Plan policy to encourage transit-oriented, compact development and revitalization efforts in older parts of the City. The General Plan (2014) has established land use policies and programs to create a balanced city with an appropriate proportion of its growth and reinvestment focused in the central core, Downtown, established neighborhoods, and along Bus Rapid Transit (BRT) corridors. A successful and vibrant Downtown is necessary to attract investment needed for infill development and rehabilitation of established neighborhoods, which are priorities for the City. Incentivizing new residential development, expanding transit options, stimulating economic development, and business and job creation will contribute to a higher-quality of life for existing and future residents of the City's core areas.



CITY OF FRESNO  
2015 HOUSING ELEMENT



## No Net Loss Provision

Government Code Section 65863 stipulates that a jurisdiction must ensure that its housing element inventory can accommodate its share of the RHNA throughout the planning period. If a reduction in residential density for any parcel would result in the remaining sites in the housing element not being adequate to accommodate the jurisdiction's share of the RHNA, the jurisdiction may reduce the density on that parcel if it identifies sufficient additional, adequate, and available sites with an equal or greater residential density in the jurisdiction so that there is no net loss of residential unit capacity. This provision applies both to a reduction of total density on an identified site through down-zoning, and the approval of a project that includes fewer units than were projected for that site in the Housing Element sites inventory.

The General Plan EIR concluded that there was a substantial increase in residential development capacity associated with the General Plan update. When comparing the 2025 General Plan to the recently adopted Fresno General Plan, an additional 4,355 acres would permit residential development, and the anticipated population build-out increased from 790,000 to 970,000 persons<sup>3</sup> (a nearly 23 percent increase). Much of this population is anticipated to be located in infill/high density areas, including along BRT corridors and in Downtown.

The City is committed to implementing new General Plan policy, as evidenced through recent adoption of the Citywide Development Code and the Downtown Development Code. In addition to General Plan implementation, the new codes provide ease in use (removing constraints and barriers to development) and also address new State law as it pertains to emergency, supportive, and transitional housing, density bonuses, and farmworker housing.

## Environmental Constraints

The sites inventory analysis responds to land use designations and densities established in the Fresno General Plan Urban Form, Land Use, and Design Element. Thus, any large-scale environmental constraints that would lower the potential yield (e.g., steep slopes) have already been accounted for in the General Plan Land Use Map and policies and the Master Environmental Impact Report. Any additional constraints that would occur on a more detailed site review basis would be addressed as part of the individual project review process. The City's capacity to meet its regional share and individual income categories are not constrained by any environmental conditions.

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<sup>3</sup> The population identified for the City of Fresno General Plan Update represents full buildout of the Planning Area. Full buildout is projected to occur in approximately year 2056.

## Infrastructure Constraints

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

### *Infrastructure Current Availability*

The City of Fresno Department of Public Utilities (DPU) provides potable water to the majority of the City. The City's 2010 Urban Water Management Plan indicates that under Single Dry Year conditions, the City's Single Dry Year supplies are adequate to meet projected Single Dry Year demands; under the first two years of a Multiple Dry Year conditions, the City's Multiple Dry Year supplies are adequate to meet projected Multiple Dry Year demands.

The City has adopted long-range capital and strategic programs through the City of Fresno Metro Plan, City of Fresno Recycled Water Master Plan, and City of Fresno Wastewater Master Plan. The City has also adopted the State's 2013 CalGreen Building Code, Model Water Efficient Landscape Ordinance, and Graywater Standards, which combine for a 10- to 20-percent reduction in water use in most new construction. General Plan Policy RC-6-b directs the City to adopt and implement ordinances, standards, and policies to achieve the intent of the City of Fresno Urban Water Management Plan, Fresno-Area Regional Groundwater Management Plan, and City of Fresno Metropolitan Water Resources Management Plan to ensure a dependable supply of water. General Plan Policy RC-6-c directs land use and development projects to adhere to the objective of the Fresno Metropolitan Water Resources Management Plan to provide sustainable and reliable water supplies to meet the demand of existing and future customers through 2025.

On March 2, 2016, the City of Fresno began construction of a new \$159-million water treatment plant with the promise of relieving the City's reliance on groundwater pumping. The new plant is a critical part of Recharge Fresno, a \$430-million program to make the most of Fresno's allocations of surface water from the San Joaquin and Kings rivers. In addition to the plant, it includes pipelines to bring water from the Friant-Kern Canal and the Kings River into the plant, as well as pipelines to carry the treated water to customers across the City. It also calls for using excess surface water to help recharge the water table.

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



together with the need to pursue more advanced levels of reclamation and reuse, must be addressed over the long term, not only in the new growth areas but also in established neighborhoods. The City of Fresno Department of Public Utilities (DPU) manages a comprehensive sewer maintenance program in accordance with its Sewer System Management Plan. The 2006 Master Plan anticipated that the RWRF would be operating at its full capacity, treating 80 million gallons of wastewater per day by 2010; however, the volume of wastewater has declined in recent years. Consequently, it is possible that the plant has sufficient capacity to accommodate growth for several years beyond what was previously anticipated. Nonetheless, the City is required by State statutes to begin planning for increased capacity when flows reach 75 percent of the current design capacity. General Plan Objective PU-4 directs the City to ensure provision of adequate trunk sewer and collector main capacities to serve existing and planned urban development, consistent with the Wastewater Master Plan. Supporting policies include continued coordination and consultation the City of Clovis, to plan and construct sewer collection facilities, pursuing construction of new or replacement sewer trunk facilities or other alternatives consistent with the Wastewater Master Plan, and pursuing enlargement or extension of the sewage collection system to serve planned urban development.

#### *Infrastructure Future Availability*

As part of the General Plan update (adopted December, 2014), the General Plan Master EIR identified the need for the expansion and new wastewater treatment facilities and improvements and expansion of water supply infrastructure. These improvements are based on build out of the General Plan. While the sites inventory represents a fraction of General Plan build out, infrastructure improvements will ensure adequate level of water and wastewater services to future development on identified sites.

The City of Fresno owns and maintains the majority of the wastewater collection systems and owns and operates two wastewater treatment facilities that serve the Fresno metropolitan area. As part of the General Plan EIR impact mitigation, by approximately the year 2025, the City will construct an approximately 70 million gallons per day (mgd) expansion of the Regional Wastewater Treatment Facility and an approximately 0.49-mgd expansion of the North Facility. The City will also construct capacity improvements along sewer trunk lines.

To address water supply capacity for the General Plan 2035 horizon, the City, by approximately 2025, will construct an approximate 80-mgd surface water treatment facility near the intersection of Armstrong and Olive Avenues, an approximately 30-mgd expansion of the existing northeast surface water treatment facility, and an approximately 20-mgd surface water treatment facility in the southwest portion of the City. The City will also construct an approximately 25,000 acre-feet/year tertiary recycled water expansion to the Fresno-Clovis Regional Wastewater Reclamation Facility in accordance with the January 2012 City of Fresno Metropolitan Water Resources Management Plan.

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

## **Financial Resources**

The City utilizes several sources of funding to assist in the provision of quality housing to lower-income residents. Several funding programs from HUD allow the City to fund community development and housing activities. The City of Fresno receives federal funding as an entitlement jurisdiction for the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) program. In 2015, the City received \$6.28 million in CDBG funding and \$1.66 million in HOME funding. In addition to CDBG and HOME funds, Fresno is also entitled to receive Emergency Solutions Grant (ESG) and Housing for Persons with HIV/AIDS (HOPWA) funds from HUD. ESG funds are used to provide homeless prevention services and to support the operation of emergency shelters for the homeless individuals and families. Annually, the City receives approximately \$389,000 in ESG and HOPWA funds.

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

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

## **Administrative Resources**

Agencies with administrative capacity to implement programs contained in the Housing Element include the City of Fresno and local and regional nonprofits, private developers, and service providers. The City of Fresno Development and Resources Management Department (formerly the Planning and Development Department)

focuses on both public and private property development throughout the City, and the sustainable management of its land and water resources and public infrastructure, including downtown and neighborhood revitalization, long-range land use planning, new development entitlements, building permits, building plan check, inspection services, and code enforcement.

The City of Fresno Housing Authority (Housing Authority) is the largest affordable housing provider within the City. The Housing Authority works with non-profit and for-profit developers to expand the supply of affordable housing, and also purchases and manages numerous affordable multi-family housing developments throughout the City and County of Fresno. Through the Housing Choice Voucher and Public Housing programs, the Housing Authority provides rental housing to residents throughout the County of Fresno, enabling qualified individuals and families to identify and reside in an array of housing options. Within the City, the Housing Authority owns and manages 601 public housing units in 16 complexes, 340 mixed-finance units in four complexes, and 773 tax credit units in 10 complexes managed by a third-party property management company retained by the Housing Authority. The Housing Authority also administers approximately 6,378 Housing Choice Vouchers. Due to limited funding, the citywide waitlist for Section 8 recipients contains 36,000 households as of 2015. Applicants are chosen via lottery and generally can expect to be on the waitlist for at least two years. The waitlist for public housing contains 24,233 households as of 2015.

The City also works closely with other private and non-profit developers to expand affordable housing opportunities in Fresno.

## **Energy Conservation Opportunities**

The City has been active since the mid-1990s in taking steps to invest and deploy renewable energy technology and improve the energy efficiency of City-owned facilities and the community at large. Notable actions include:

- Adopting the 2013 California Energy Code;
- Developing a comprehensive free residential energy efficiency survey program (by April 2014, the City had conducted over 2,500 residential energy efficiency surveys to Fresno homes);
- Implementing the Fresno Energy Watch Program as part of the Fresno Small Business Energy Makeover;
- Using renewable biogas to produce electric power at the Fresno-Clovis Regional Wastewater Reclamation Facility;
- Installing solar panels at City-owned facilities (as of April 2014, the City had deployed over 4.85 megawatts of solar power on City-owned facilities, including the largest single solar farm at any airport in the nation while a two-megawatt solar array is planned for the Fresno-Clovis Regional Wastewater Reclamation Facility); and
- Requiring installation of solar energy systems in construction of any new City-owned buildings containing at least 7,500 square feet, and a mandate to use a

green building rating system standard for all new municipal buildings over 10,000 square feet.

The City promotes household conservation of electricity and strives to change current trends of higher energy use in newer development to conserve resources for future growth. The City's Fresno Green program is committed to the construction of buildings and communities that are sustainable and environmentally responsible. Incentives for certified Fresno Green development projects include:

- 25 percent fee reductions of many planning application fees
- 20 percent minor deviation from development standards, if needed (25 percent if public art is incorporated into the project)
- Eligibility for a Fresno Green award and use of the Fresno Green brand for the project.

Pacific Gas & Electric (PG&E) also has energy efficiency programs operating in the Fresno area. Many of these programs are available to low-income households and families, such as the Energy Partners program and Middle Income Direct Install (MIDI) program. Other programs are focused on local businesses, such as the Direct Install program of the Fresno Energy Watch, the Air-Care Plus program, and numerous others.

The Fresno County Equal Opportunities Commission administers the federally-funded weatherization programs available to low-income homeowners in Fresno. This program is designed to work in collaboration with utility funded programs operated by PG&E. There are several areas of layering associated with these programs.

Private organizations, businesses, and individuals are also taking important steps locally. Fresno has the third highest deployment level for solar power among cities in California, with 1,056 sites that total 12 megawatts of power generation capacity. The level of investment in solar power in Fresno has seen a rapid increase since 2006, with over 532 systems installed in 2010 compared with only two systems installed in 2006. In July 2009, *Environment California* ranked Fresno third in the State for number of kilowatts its solar projects produce and fifth for projects on roofs, with Clovis close behind at seventh.

Residents also have access to the Home Energy Tune-Up Program which leverages funds from the California Energy Commission, the U.S. Department of Energy, and PG&E. The California Energy Commission provided initial funding of \$2.9 million for the Program, which provides free home energy assessments. The Home Energy Tune-Up Program has been a great collaboration of local, State, and federal governments working with the private sector to provide needed assistance to homeowners. The program is provided at no cost to the homeowner and is helping families save from \$300 to \$2,400 per year on their utility bills. The Home Energy Tune-Up program, managed by the City of Fresno, is designed to assist homeowners in determining where their house wastes energy. The program provides a detailed report recommending

energy efficiency improvements, and helps homeowners access available rebates, incentives and financing options to make their house energy efficient.

## Chapter Four – Constraints to Housing Production

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This chapter addresses governmental and non-governmental constraints as they relate to housing. Constraints to the provision of housing for all income levels must be addressed within each jurisdiction's Housing Element. Only with the identification and acknowledgement of such constraints is a community able to systematically undertake whatever reasonable steps are available and feasible to correct such impediments. Not every constraint to housing production is governmental. Others constraints include the housing market, social awareness and other non-governmental limitations. All constraints tend to limit the number, and increase the cost, of housing units.



Park Grove Commons, completed in two phases (2011 and 2014)

### Market Constraints

#### Land Cost and Availability

Land costs have a demonstrable influence on the cost and availability of affordable housing. Land costs are influenced by many variables, including scarcity and developable density, location, site constraints, and the availability of public utilities. As land becomes less available, the price of land increases. Due to location and sufficient supply of vacant land, housing costs in Fresno have generally remained lower than in

other areas of the State. The preferred housing type for a majority of Fresno area residents is the owner-occupied, single-family, detached house. Of the 171,841 housing units in Fresno as of the 2010 Census, 104,762 were single-family detached structures. This represents 61 percent of all housing units in the city of Fresno. This strong demand for single-family housing has tended to keep housing costs somewhat higher than they would be if alternative housing types such as condominium units or planned unit developments were in greater demand.

Raw land costs of residential lots in Fresno depend on the size and location of the parcel and the extent of improvements contained on the lot. In March 2016, there were 12 lots listed publicly for sale on loopnet.com ranging from \$140,000 for a 3.7-acre lot to \$10.4 million for an 81-acre lot. On average, the cost of land among the listed properties was \$118,000 acre.

### ***Materials and Labor Costs***

Construction costs for housing can vary significantly, depending on the type of housing, such as single family, townhomes, and apartments. However, even within a particular building type, construction costs vary by unit size and amenities. The difficulty of developing awkward infill sites can also add to costs. Another factor related to construction costs is the number of units built at one time. As the number increase, overall costs generally decrease as builders can benefit from the economies of scale. For standard housing construction, costs may average \$112 to \$144 per square foot for single-family residences depending on the level of amenities provided, and \$103 to \$154 per square foot for multifamily residential structure, depending on construction type and excluding parking (International Code Council Building Valuation Data, August 2015).

Another major cost component of new housing is labor. The cost of labor in Fresno County is comparatively low because the area's cost of living is relatively low compared to other areas in California. However, labor for government subsidized housing work is additionally costly for the Central Valley, as wages are rooted in the required State Labor Standards based on higher northern and southern California prevailing wages.

### ***Financing Costs***

Financing costs are subject to fluctuations in national economic policies and conditions. The cost for site preparation and construction is a very important determinant of the initial cost to the purchaser. Mortgage rates have an even more dramatic effect on the cost of housing and on the cost of rental unit construction. Apartment owners typically pass on interest rate costs to a tenant by way of increased rent. There is always a concern that interest rates will increase again during future years; any such increases may result in a slowing of construction activity.

It was previously and generally accepted that a 14 percent interest rate was the level at which most buyers were expected to drop out of the market. However, with the increase

in all other housing costs in the current market, even minimal rises in interest rates could have a particularly dramatic effect on the building industry and potential buyers.

Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. The primary concern in a review of lending activity is to determine whether home financing is available to a county's residents. 2014 HMDA data indicates that the loan denial rate in Fresno is close to 13 percent, down from a high of 32.3 percent in 2007. During the 2004 to 2014 period, HMDA data also reveals that denial rates for ethnic residents was higher than for white residents. There was a positive relationship between income and denial rates. For all groups, denial rates decreased as income increased (City of Fresno 2016 Analysis of Impediments to Fair Housing Choice Fair Housing Forum presentation). The City is in the processing of updating the Analysis of Impediments to Fair Housing Choice which will take a more in-depth look at access to financing by race/ethnic and income groups.

### ***Access to Mobility Options***

As buildable infill properties become scarce, new developments are allocated to urban fringes, creating an environment that inhibits access to mobility options to reach goods and services, particularly for seniors, low-, very low- and extremely low-income households, and persons with disabilities. Accessible transportation to goods and services, or accessible neighborhood commercial businesses should be included in city fringe area planning and in the development of affordable housing.

Senate Bill 375 requires local jurisdictions to include sustainable communities strategies as outlined in their regional transportation plans. These requirements help to reduce greenhouse gas emissions, align transportation and housing, and create incentives for implementing these strategies.

## **Governmental Constraints**

### **Governmental Layers for Entitlements**

In addition to local planning departments, developers must also work through the Air District, Water Districts, School District and sometimes Local Agency Formation Commissions (LAFCO) to obtain entitlements for construction of housing. Each additional Agency requirement adds cost to the project and ultimately the housing unit. The time necessary for processing these requirements also raises housing cost. Coordination and simultaneous processing among agencies should assist in reducing processing time and cost.

### ***Annexation***

The City and County of Fresno continue to process annexations, in conjunction with a joint policy that all urban-intense development within the City's Sphere of Influence is referred to the City for annexation and the processing of entitlements. The time necessary to process annexations on the urban fringe averages about one year, even



with the City's concurrent processing of entitlements policies. There is sufficient annexed and zoned land within the city to accommodate immediate housing needs and the housing needs for this Housing Element planning period. The City monitors land supply, underutilized parcels, areas planned for redevelopment, and resulting development to ensure a balance.

### **Development Review Process – Components**

The City's development review process and Development Code are established to review and enforce: heights, size of buildings and other structures designed, erected or altered. Through this process, which includes requirements for residential yard size and other open space provisions, population density standards are implemented in conformance with the General Plan. These practices are essential to advance the most appropriate land use, conserve and stabilize the value of property, provide adequate open space and avert undue concentration of population. Regulation is also necessary to mitigate street congestion, facilitate provision of adequate community utilities such as transportation, water, sewage, schools, parks and other public facility requirements, and to safeguard the health, safety and general welfare of the public.

#### ***Permitted Uses***

The Development Code classifies residential development projects based on type, use, size and location in order to determine whether the project is Permitted, Conditionally Permitted (through conditional use permit) or Not Permitted. The Development Code provides for a range of housing types, including single-family, multi-family, second dwelling units, mobile homes, residential care facilities, emergency shelters, supportive housing, transitional housing, and single room occupancy (SRO) units. Table 4-1 provides a summary of Fresno's Development Code as it relates to ensuring a variety of housing opportunities.

**Table 4-1: Housing Types Permitted by Zoning District**

Uses	RE	RS-1	RS-2	RS-3	RS-4	RS-5	RM-1	RM-2	RM-3	RM-MH	NMX	CMX	RMX	CMS	CR
Single Unit Dwelling - Detached	P	P	P	P	P	P	P								
Single Unit Dwelling - Attached					C	P	P	P			P(1)	P(1)	P(1)	P(2,16)	P(2,16)
Second Dwelling Unit	P	P	P	P	P	P	P	P							
Duplex						C	P	P	P						
Multi-Unit Res.						C	P	P	P		P(1)	P(1)	P(1)	P(2,16)	P(2,16)
Resid. Care Facility General (>6 persons)		C	C	C	C	C	C	P	P					C(1)	
Resid. Care Facility Limited (6 or less persons)	P	P	P	P	P	P	P	P	P		P(1)	P(1)	P(1)	P(1)	P(2)
Resid. Care Facility Senior							C	P	P					C(1)	
Emergency Shelter													P		
SRO								C	C						
Mobile Home Parks										P					

P+designates permitted uses.

C+designates uses that are permitted after review and approval of a Conditional Use Permit.

NO+designates uses that are not permitted.

**Mixed Use Districts Limitations**

1: Not allowed on the ground floor along major streets.

**Commercial Districts Limitations**

1: Not allowed on the ground floor.

2: Not allowed on the ground floor along arterials or collectors.

16: Residential uses shall not exceed 16 du/ac.

Source: City of Fresno Development Code, 2016.

### ***Permit Processing***

Development review is conducted by the City of Fresno Development and Resource Management Department with responsibilities including current and advanced planning functions. Current planning includes staffing the public counter to receive applications and answer questions, processing and analysis of various entitlements, permit issuance and corrected exhibit processing for public and private projects. It also involves providing engineering and technical staff support to commercial and residential projects.

Advanced planning includes updates to the General Plan, preparation of various community and specific plans, and special environmental, transportation, housing and demographic studies. This division also promotes regional planning coordination with various agencies.

Considerable holding costs are associated with delays in processing development applications and plans. The City of Fresno's development review process is designed to accommodate housing development applications of various levels of complexity and requiring different entitlements. Processing times vary with the complexity of the project. Single-family dwelling unit applications typically take 14 to 21 days if a single unit on one lot; 6 to 8 months if part of a subdivision to obtain a tentative map and building permits. Multi-family development applications take 2 to 3 months through the Development Permit (previously Site Plan Review) process and an additional 14 to 21 days for building permits.

The City's permit procedures do not unduly constrain housing development. If the Director determines that the proposed use or building is allowed as a matter of right by the Development Code, and conforms to all the applicable development and use standards, the Director can issue a Zone Clearance. A Development Permit (DP - formerly a Site Plan) can be approved by the Director and is required to ensure that new development is carried out in accordance with the Development Code and the goals and objectives of the General Plan and any other adopted plans and guidelines. Conditional Use Permits are granted by the Director for uses that are generally consistent with the purposes of the district where they are proposed but require special consideration to ensure that they can be designed, located, and operated in a manner that will not interfere with the use and enjoyment of surrounding properties or adversely affect the city's infrastructure, the built or natural environment, city resources, or the City of Fresno's ability to provide public services. Where more than one procedure is required, typically with a rezone application, every effort is made by the City to process them concurrently, thereby reducing delay. Uses and their requisite procedures applicable to the residential development are detailed in the tables below.

The tables below outline the typical timelines for various residential projects in the city of Fresno. Table 4-2 generally identifies the typical approvals required for single-family and multi-family projects along with the estimated processing times of the planning and building departments. Table 4-3 focuses more specifically on the individual entitlement approvals that may be required, providing estimated processing timelines for each as well as identifying the approving body.

**Table 4-2: Typical Processing Procedures by Project Type**

	Single Family Unit	Subdivision	Multi-family < 20 units	Multi-family > 20 units
Typical Approval Requirements	Resid. Plan Check	Tent. Map	DP/CUP <sup>1</sup>	DP/CUP <sup>1</sup>
	Bldg. Plan Review	Subd. Review Committee	Plan Check	Plan Check
	Permitting	Planning Commission	Permitting	Permitting
	Inspection	Final Map	Inspection	Inspection
		Plan Check		
		Permitting		
		Inspection		
Est. Total Processing Time	Planning = 2 days Plan Check = 14-21 days <sup>2</sup>	Planning = 50 days if no accompanying rezone or plan amendment application. Plan Check = 14-21 days <sup>2</sup>	Planning = 2-3 mo. Plan Check = 21 days <sup>2</sup>	Planning = 2-3 mo. Plan Check = 28 days <sup>2</sup>

<sup>1</sup> Subject to appeal

<sup>2</sup> Varies by sq. ft., building type, design, complexity and volume of workload; inspection times not included  
DP = Development Permit

**Table 4-3: Timelines for Permit Procedures**

Type of Approval or Permit	Typical Processing Time	Approval Body
Ministerial Review	1-14 days	City Staff
Architectural/Design Review	Infill 7-10 days	City Staff/Design Review Board
Conditional Use Permit	45-90 days, depending on Level	Planning Director <sup>1</sup>
Variance	45 days	Planning Director <sup>1</sup>
Minor Deviation Assessment	15-20 days	Planning Director <sup>1</sup>
Zone Change	75-90 days	City Council
General Plan Amendment	90-120 days	City Council
Development Permit	30-60 days, depending on Level	Planning Director <sup>1</sup>
Tract Maps	60-90 days	Planning Commission
Parcel Maps	45-60 days	Planning Director <sup>1</sup>
Environmental Assessment	•Cat. Exempt = 1-2 days •Neg. Decl. & MND = 45-90 days •EIR = 9-12 months	Same approval body as Type of Approval or Permit

<sup>1</sup> Subject to appeal

Procedures applicable to the residential development review process are as follows:

- Environmental Assessment
- Urban Growth Management Evaluation
- Subdivision, Parcel Map Review
- Conditional Use Permit Process \*
- Development Permit (formerly Site Plan Review)

<sup>1</sup> Subject to appeal

- Variance and Minor Deviation Assessment \*
- Structural Plan Check
- Construction Permit Issuance
- Inspection
  - \* (as applicable)

Residential development projects, based on type and size, are subject to one or more of the procedures listed above. The Development and Resource Management Department is responsible for application intake, permit issuance, plan checking, and inspection services for public and private projects. This Department provides public counter services, subdivision processing, urban growth management, various entitlements associated with development, and engineering and technical staff support to commercial and residential projects. The Planning Division within the Department has as a primary objective the expeditious review and approval of all development projects.

To encourage development in the central, more urbanized parts of Fresno, the City provides priority processing to all projects within the boundaries of the Downtown Planning Area and in Inner City Residential areas.

### ***Environmental Assessment***

An environmental assessment of a residential development is usually conducted simultaneously with the subdivision/parcel map review process or as special permits are processed. The assessment does not substantially add to overall processing time unless significant adverse environmental effects are determined, and evidence indicates that an Environmental Impact Report (EIR) is required which can take eight to twelve months. Since the City of Fresno has certified a Master EIR (MEIR SCH No. 2012111015) for its General Plan and Development Code, a requirement for a new EIR would be extremely rare.

### ***Urban Growth Management***

Urban Growth Management (UGM) fees apply to residential projects located on the geographic fringe of the city. The process is not intended to prevent development, but it does preclude inordinate costs to the City and limits disorganized growth. The process is specifically intended to ensure adequate municipal facilities, improvements, and services are available when needed, and to protect the city and its residents by minimizing costs.

### ***Subdivision, Parcel Map Review***

Subdivision of real property is initiated via the tentative tract or tentative parcel map process. Tentative maps are processed and approved in fewer than 50 days when not being processed along with other entitlements such as Rezones or Plan Amendment applications. The final map process is essentially ministerial with major responsibility for prolonged processing resting with the developer and the developer's engineer.

### ***Conditional Use Permit Process, Variance, and Minor Deviation Assessment***

The Conditional Use Permit (CUP) review process is intended to apply to uses that are generally consistent with the purposes of the district where they are proposed but require special consideration to ensure that they can be designed, located, and operated in a manner that will not interfere with the use and enjoyment of surrounding properties or adversely affect the city's infrastructure, the built or natural environment, city resources, or the City's ability to provide public services. Processing normally does not exceed 60 days. However, CUPs may be appealed to the Planning Commission, and in such instances, the processing time can be extended by as many as thirty to forty-five days. Development permit review, variances and minor deviations are all variations of the CUP and processing timelines are generally the same.

### ***Development Fees***

Housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. As a result, the City relies upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed.

Typical development fees may include, but are not limited to the following:

Parks and Recreation	Law Enforcement Facilities
Schools	Fire Facilities
Traffic Fees	Library Facilities
Streets and Signals	Water Facilities
Waste Water Treatment	Waste Water Collection
Drainage Facilities	Community Development Fees
General Facilities	Public Facilities
Environmental	Facilities Assessment

Most, if not all, developers consider any fee a significant constraint to the development of affordable housing. For affordable housing projects, financing generally includes some form of state or federal assistance, with rents set through the funding program. As such, fees cannot and do not increase the rents. Although the various fees account for a significant portion of the development cost, the fees collected are necessary to pay for much needed infrastructure and to help mitigate new growth throughout the city.

A list of all special permit and related application fees are provided in this Chapter. All other application fees are listed in the City's Master fee schedule. Table 4-4 and 4-5 provide estimated planning and development cost for typical multi-family and single-family developments, respectively. Individual costs are outlined in the City's Special Permit & Related Application Fees.

**Table 4-4: Proportion of Fee in Overall Development Cost for Multi-family Residential Developments**

Development Cost for a typical unit	Park Grove NW	Cityview	Bridges @ Florence	Edison Plaza
Total Number of Units	148	45	34	128
Total est. fees per project:				
Entitlement Fees	\$12,549	\$5,561	\$7,345	\$13,786
Fresno Metro Flood Control Fees	\$57,135	\$4,263	\$12,651	\$54,277
Air District 9510 Fees	\$34,441	\$734	\$490	\$490
TOTAL Fees Per Project	\$104,125	\$10,558	\$20,486	\$68,553
Total Estimated Fees Per Unit	\$703.55	\$234.62	\$602.52	535.50
Typical estimated cost of development per unit	\$228,140	\$240,469	\$203,132	\$130,934
Est. proportion of fee cost to overall development cost per unit	0.3%	0.1%	0.3%	0.4%

October 2015

**Table 4-5: Proportion of Fee in Overall Development Cost for Recent Single-family Residential Development**

Development Cost for a typical unit	T-5626
Total est. fees per unit	\$15,544
Typical estimated cost of development per unit	\$186,047
Est. proportion of fee cost to overall development cost per unit	8.35%

October 2015

Development of a one-unit single-family home would not require any of the mentioned application fees if no variance or other development standard modifications were necessary. The only fees associated with this type of project are building permit and related impact fees. Building permit fees vary and are based on square footage of the unit.

Table 4-6 shows average fees for special permits and planning applications for both single- and multi-family units. For the City, entitlement fees now cover the full cost of processing by City staff. Although the fees themselves have increased, the percentage of fee cost as a part of total production cost has remained stable. While not a major constraint factor, increased fees have played a measurable role in increasing housing costs.

The City of Fresno has a long-standing adopted Inner City Development Policy that reduces fees for new development in certain areas. Under this program, Fees shown in Table 4-6 with two asterisks (\*\*) are reduced by 50 percent for Inner-City areas with the exception of alcohol CUP applications. In Herndon Townsite, Highway City, and Pinedale areas, these reduced fees are limited to residential projects. More detail on the Inner City fee reductions are noted below in Table 4-7.

**Table 4-6: Special Permit and Related Planning Application Fees (Updated 11/14/14)**

Permit	Fee	Permit	Fee
<b>Conditional Use Permit *1</b>		<b>Site Plan Review *1</b>	
New Applications	\$8,177**	New Application	\$6,905**
Mid-rise/High-rise bldg.	\$14,719**	Amended SPR	
		Amendment to approved SPR	\$2,726**
Amended Permit		Revised Exhibit (major)	\$1,590**
Minor Amendment	\$3,271**	Revised Exhibit (minor)	\$727**
Revised Exhibit (major)	\$2,135**	Hourly consulting fee	
Revised Exhibit (minor)	\$909**		
		Rear Yard Encroachment	\$591
Corrected Exhibit (all CUP)	\$545**		
after 2+hr. consultant fee as req. (1hr. Min.)			
Special Use CUP (Asterisked Use)	\$6,342**		
Secondhand Store, C-5		2nd Unit	
Adult day-care/residence support family		Site Plan	\$2,630
Thrift Shop		Parks, Fire, Traffic, & Police	\$604
Billboard/Offsite Subdivision Sign		No EA fee	
Miscellaneous Fees			
ISO Containers	\$727**	Variance	
Base Refund Fee	\$144	Security Related	\$6,160**
Zoning Inquiry (1 hour deposit)	\$182	Single-family on 1 net ac or less	\$6,160**
		Inner City	\$3,080
Traffic Study (100 peak trips)	\$288	All other applications	\$8,020**
<b>*1 PLUS:</b>		<b>MINOR DEVIATIONS</b>	\$808
Street Tree LS Plan Check	\$56		
Fire Prevention Review	\$247	<b>ENVIRONMENTAL ASSESSMENTS *2</b>	
Traffic Engineering Review	\$91	Categorical Exemption	\$1,181**
Police Review	\$210	Finding of Conformity	\$3,634**
		Mitigated Negative Declaration	\$8,722**
<b>GOVERNMENT EA's</b>		Related Special Studies for	
Exemption	\$1,181**	all EAs	hourly rate
Finding of Conformity	\$3,634**	Planning review of otherssq Special	
Mitigated Negative Declaration	\$8,722**	Studies	\$328
		Planning review of Traffic Studies	\$492
		EIR focus . minimum deposit	\$59,147
		EIR Program . minimum deposit	\$86,948
Tentative Tract Map		<b>FISH &amp; GAME ASSESSMENT</b>	
Pre-application and verification	\$3,033	(for applicable projects)	
Per Map	\$16,700	Negative Declaration	\$2,101.50
Per each 50 Lots	\$8,815	Mitigated Negative Declaration	\$2,101.50
Traffic	\$470	Environmental Impact Report	\$2,919
Fire	\$134	Environ. Document/Certified	\$992.50
Parks	\$124	Regulatory Program	
Police	\$210		
Map Extension	\$210	<b>*2 PLUS:</b>	
		City filing fee	\$55
<b>LOT LINE ADJUSTMENT</b>	\$5,360	County filing fee	\$50
<b>VOLUNTARY PARCEL MERGER</b>	\$5,360	<b>GENERAL PLAN AMENDMENT</b>	\$10,539**
		Plan Modification	\$4,597
		Inner City	\$5269.50
		Traffic Review	\$163



**Table 4-6: Special Permit and Related Planning Application Fees (Updated 11/14/14)**

Permit	Fee	Permit	Fee
<b>SUBDIVISION SALES TRAILER</b>			
Minor Amendment (trailer & on-site parking)		<b>REZONE</b>	\$10,325**
	\$2,726	Modification to zoning conditions	\$9,147**
Traffic	\$91	Traffic Review	\$110
Fire	\$247	Fire Department	\$134
Trailer only	\$640		
		<b>SECURITY WIRE PERMIT</b>	\$454
<b>ADMINISTRATIVE TIME EXTENTION</b>			
Special Permit	\$210	<b>HOUSE MOVING/STREET USE</b>	\$54
<b>COVENANTS</b>		<b>EASEMENT ENCROACHMENT</b>	\$420
Preparation and recording	\$1,094		
Revision of Covenants	\$721	<b>DIRECTOR'S CLASSIFICATION</b>	\$3,933
Release of Covenants	\$721		
		<b>ANNEXATION</b> (LAFCO fees must be paid by the applicant)	
<b>ADDRESS</b>		Inhabited	\$11,463
Assignment . Parcel Map	\$256	Un-inhabited	\$8,193
Assignment . Tract Map	\$364		
		<b>ZONING ORD. TEXT AMENDMENT</b>	\$12,381
Change (per address)	\$250	<b>SIGNS</b>	
		Master sign program	\$999
		Sign (Master)	\$182
		Sign Review	\$318
		Banner Review	\$182

Source: City of Fresno, November 2014 Fee Schedule

**Table 4-7: Inner City Fee Reductions for New Development**

Permit	Fee	Notes
Voluntary Pre-application Review	\$105	
Plan Amendments	\$1,060	
Rezoning	\$520	
Parcel Maps		50% of normal fee
Conditional Use Permits		50% of normal fee
Site Plan Review Applications		50% of normal fee
Grading Permits		50% of normal fee
Voluntary Change of Occupancy (when not a result of code enforcement)		50% of normal fee
Variance to Review Development Standards	\$110	
Environmental Assessments (*included in above flat fees)	*	
Director-Initiated Rezoning in Case of Injustice of Hardship	\$0	
Minor Deviation	\$320	
Relocation Inspection Within Inner City Area		50% of normal fee

Source: City of Fresno, Inner City Development Policy, 2015

### ***Standards, Dedications, and Improvements***

Site improvements and property dedications are important components of new development and contribute to the creation of decent housing. Housing construction in Fresno is subject to a variety of site improvement and building code requirements that add to the cost of development. Developers are generally responsible for covering the full cost of water, sewer, road, and drainage improvements within their projects. Typically, site improvements are requested during the planning review process.

Improvement requirements are the same throughout the city of Fresno, however some sites require fewer improvements if the infrastructure already exists and is in good condition. Typical off-site infrastructure improvements for new projects include constructing new streets, which include undergrounding of utilities, parkway landscaping, curbs, gutters, sidewalks, and street lighting that are in compliance with standards as defined in the General Plan and the Municipal Code. Local residential streets require a dedication of 56 feet with a curb-to-curb width of 36 feet for a design with parking on both sides of the street (Public Works Standard P-56).

In areas already served by infrastructure, site improvement requirements vary depending on the existing condition of each project site. Usually, only standard connection laterals are required for most project utilities. The undergrounding of utilities from the nearest pole to the project is required of all projects (although there is a process for the granting of waivers in hardship cases), and street tree planting may also be required. New subdivisions typically require public and circulation improvements for the orderly and efficient development of the community.

As stated in the Municipal Code (Section 15-3804), site improvements for residential subdivisions include:

- 
- Grading of streets and alleys, installation of street lighting, drainage pipes or lines, and drainage structures.
- Installation of sidewalks, curbs, gutters, and driveway approaches, unless the Standard Specifications for the Street Section do not require the improvements.
- Surfacing of a width and quality suitable for the particular type of street or alley as established in specifications adopted therefore.
- Pedestrian ways, including paving, landscaping, and fences and walls as may be required.
- Bikeways as may be required.
- Trails, Greenways, or Parks. As may be required.
- A water system of sufficient design and capacity to furnish an adequate water supply for each lot in the subdivision and for adequate fire protection to the area, as determined by the City Engineer.
- Sanitary sewer facilities and connections for each lot.
- Services from all utilities for each lot, made in such manner that will avoid or minimize disturbance of completed street improvements.
- The installation and planting of median islands, as may be required.
- Street Trees

- Street Signs
- The installation of an underground street lighting system approved by the City Engineer, as required.

Overall, the purpose of on- and off-site requirements is to ensure the health and safety of residents. These improvements are not seen as constraints to development as efficient site planning should balance necessary on-site improvement costs to make affordable housing feasible. While required on- and off-site improvements may add to the cost of housing on affected properties, it is not evidenced that these requirements and associated costs represent a higher standard than other jurisdictions in the County and beyond. On- and off-site improvement requirements do not constitute extraneous requirements, and the additional cost associated with these requirements may enhance property value. In addition to its Inner City Planning Application Fee Incentive Program (see Chapter 6) the City of Fresno has recently adopted a fee waiver program that applies to mixed use projects in economically disadvantaged areas. The program waives development impact fees for police and fire facilities, regional streets, new growth streets and traffic signals for qualifying projects.

In addition, the City incentivizes infill development of all types by adoption of a tiered system of traffic Level of Services (LOS) standards and requirements for Traffic Impact Studies. General plan policy MT-2-i addresses LOS standards that would require a Traffic Impact Study. This system provides a ranking of the efficiency of a street segment or intersection with six categories ranging from A (free traffic flow with individual vehicles virtually unaffected by the presence of other vehicles) to F (forced, stop-and-go travel with the volume of vehicles substantially exceeding the capacity of the street). The LOS standards are more relaxed for existing, developed areas of the city where higher density and affordable housing would most likely be located. For example, the Downtown area has a level of service standard of F and built out areas of the city where infill development is encouraged must maintain a peak hour LOS standard of E. The City's previous General Plan policies called for an LOS D throughout the city, which was a standards that required more traffic improvement and was sometimes a barrier to new infill development in the center of the city.

The following criteria apply:

- Traffic Impact Zone I (TIZ-I): TIZ-I represents the Downtown Planning Area. Maintain a peak hour LOS standard of F or better for all intersections and roadway segments.
- Traffic Impact Zone II (TIZ-II): TIZ-II generally represents areas of the city currently built up and wanting to encourage infill development. Maintain a peak hour LOS standard of E or better for all intersections and roadway segments.
- Traffic Impact Zone III (TIZ-III): TIZ-III generally represents areas near or outside the city limits but within the sphere of influence as of December 31, 2012. Maintain a peak hour LOS standard of D or better for all intersections and roadway segments.

- Traffic Impact Zone IV (TIZ-IV): TIZ-IV represents the southern employment areas within and planned by the City. Maintain a peak hour LOS standard of E or better for all intersections and roadway segments.

### ***Building Codes***

Building and safety codes are adopted to ensure the construction of safe and decent housing. These codes and standards also have the potential to increase the cost of housing construction or maintenance.

The Cities of Fresno and Clovis, the County of Fresno, along with the Fresno City and County Chambers of Commerce, and the Building Industry Association have an effective review committee that meets yearly. That committee reviews electrical, plumbing and mechanical codes of the three jurisdictions. The goal is to develop uniform codes and other processes as the need arises.

### **Community Revitalization (Code Enforcement)**

The Code Enforcement staff of the City responds to all complaint calls within three days. As stated in Chapter 5 (Accomplishments), the City Development and Resource Management Department, Community Revitalization Division set a goal of assertively conducting targeted neighborhood inspections of 35,000 housing units for potential health and safety issues. The majority of housing cases (estimated at 80 percent) received by the Community Revitalization Division are nuisance cases - open vacant properties, blighted (rubbish, junk and debris), fire hazards (dry weeds and grass). The remaining 20 percent of the housing cases addressed by the Division include structural deficiencies.

### ***Business-Friendly Fresno***

The City of Fresno has replaced former planning and development "red tape" with an easy to follow, customer-focused approval process, known as Business-Friendly Fresno. The new straightforward approach identifies projects based on their complexity. The City of Fresno has developed Business Friendly Fresno to establish accountability and clear protocols and authority for decision-making that align with the General Plan and the Development Code. The program establishes an optimized process based on the complexity of a project. The simpler a project, the quicker the review with some projects being approved over the counter. For more complex projects, the developer can meet with the Development Review Committee (DRC) comprised of a staff person from all of the reviewing departments, to collaboratively discuss the application and receive concise and thorough feedback. Business-Friendly Fresno streamlines the development process, eliminating roadblocks for projects that meet the defined process criteria.

### **Planning and Policy Constraints**

Policies related to the location of areas designated for housing development and the density of that development are set through the City's overarching planning policies.

The quantity of land designated for residential uses is adequate to accommodate the city's anticipated growth through 2035 and beyond.

## Land Use Controls

The Fresno General Plan sets forth policies that guide new development, including new residential development. Table 4-8 summarizes the land use designations within the city that allow residential uses, as well as their permitted net densities (without density bonus).

**Table 4-8: Fresno General Plan Land Use Designations**

General Plan Designation	Minimum Density (DU per acre)	Maximum Density (DU per acre)	Notes
Buffer	--	0.05 (1 unit per 20 net acres)	
Low Density Residential	1 unit per 5 acres	3.5	
Medium Low Density Residential	3.5	6	
Medium Density Residential	5	12	
Medium High Density Residential	12	16	
Urban Neighborhood Density	16	30	
High Density Residential	30	45	
Neighborhood Mixed Use	12	16	Min. 50% Residential
Corridor/Center Mixed Use	16	30	Min. 40% Residential
Regional Mixed Use	30	45	Min. 30% Residential
<b>Downtown Planning Area Land Uses Allowing Residential Uses*:</b>			
Downtown- Central Business District (CBD)	--	60	
Downtown- Town Center	--	45	
Downtown- Neighborhood Center	--	30	
Downtown- Chinatown District	--	45	
Downtown- Corridor General	--	30	
Downtown- Neighborhoods	--	16	
Downtown- South Stadium District	--	60	

\*Note: The density standards in Downtown are included in the General Plan for capacity analysis purposes. No site specific density maximums are established for the Downtown Planning Area.

Source: Fresno General Plan, Urban Form, Land Use, and Design Element

## Residential Development Standards

Existing land use districts within the Fresno Development Code provide for a range of residential uses within the Buffer<sup>2</sup> designation, six single-family districts, four multi-family districts, three mixed-use districts and two commercial districts. Table 4-9 shows Development Standards by zoning district.

<sup>2</sup> The Buffer land use designation in the City of Fresno General Plan, Urban Form, Land Use, and Design Element is intended to separate urban uses from long-term agricultural uses in order to preserve long-term viable agricultural areas and intensive farming operations adjoining but outside the Planning Area.

**Table 4-9: City of Fresno Development Standards by Zoning District**

Zoning District	Max. Height	Min. Lot Width	Minimum Yard Setback			Minimum Lot Area	Density (DU per Acre)	Max. Lot Coverage	Permitted Uses
			Front	Side	Rear				
Residential Single Family (RS) Districts									
RE	35	80-160	35	10-35	20	5 acres	0.2	30%	SF*
RS-1	35	80-160	35	10-25	20	36,000	1.2	30%	SF*
RS-2	35	80-130	30	10-25	20	20,000	2.2	30%	SF*
RS-3	35	60-90	25	5-20	20	9,000	0.2-3.5	35%	SF*
RS-4	35	40-70	13	4-10	10	5,000	3.5-6	50%	SF*
RS-5	35	30-60	13	3-10	10	4,000	5-12	60%	SF/MF*
Residential Multi-Family (RM) Districts									
RM-1	40	--	10-20	10-15	20	--	12-16	50%	SF/MF*
RM-2	50	--	10-20	10-15	15	--	16-30	50%	MF*
RM-3	60	--	10-20	10-15	15	--	30-45	60%	MF*
RM-MH	35	--	10-20	10-15	10	--	12-16	50%	MF*
Mixed-Use Districts (MX)									
NMX	40	--	0	0	0	--	12-16 (1.5 FAR)	--	SF/MF*
CMX	60	--	0	0	0	--	16-30 (1.5 FAR)	--	SF/MF*
RMX	75	--	0	0	0	--	30-45 (2.0 FAR)	--	SF/MF*
Commercial (C) Districts Allowing Residential Development									
CMS	35	--	0	0	0	--	Max 16 DU/ac and 1.0 FAR	--	SF/MF*
CR	75	100	15	0	0	10,000	Max 16 DU/ac and 1.0 FAR	--	SF/MF*

Notes: Densities in the Residential Single Family Districts are based on corresponding land use designation in the Fresno General Plan. For Mixed Use zones, minimum residential density is not required for projects on lots less than 20,000 sq. ft. in area, projects further than 1,000 feet from a planned or existing BRT route and projects which submit a Development Permit application prior to January 1, 2019. For mixed-use and commercial districts, all permitted uses are allowed either alone or in combination with other permitted uses unless otherwise stated.

\*See Development Code for additional uses.

Source: City of Fresno Development Code, 2016

Note that all new development has an obligation to provide open space. Fresno City Code requires that a minimum of 3 acres per 1,000 population be set aside for parks. Pursuant to State law, in-lieu fees may be paid instead of land dedication. The parkland requirement amounts to .00933 acres per single-family residence, and .00759 acres per multi-family unit.

The type, location and density of residential development are primarily regulated through the Development Code. The Code serves to protect and promote the health, safety, and general welfare of the residents of the community while also serving to implement the goals and policies of the General Plan. Reflective of the diversity of the residential offerings in Fresno, the standard minimum lot size for single-family residential zoning districts ranges from 4,000 square feet (RS-5) to 5 acres (RE). This translates to densities ranging from one unit per 5 acres to ten-plus residential units per

net acre. The allowable density in multi-family residential zoning districts ranges from 12 residential units per acre up to 45 units per acre.

All single-family residential districts have established development standards for minimum lot area, building setbacks, lot width and depth, and building height. The multi-family residential districts have additional standards for building coverage and open space areas. Residential development is also permitted in three mixed-use districts and two commercial districts. In addition, zoning standards for three Downtown districts are in the process of being established and will be in place by mid-2016.

Zoning standards for the Downtown districts are in the process of being established and are projected to be in place by mid-2016. In the interim, the City has adopted a Zoning Designation Translation Table that identifies the applicable standards in the newly adopted Development Code that correspond to that parcel's existing zoning designation. The use of the Zoning Designation Translation Table allows for continued development activity prior to incorporating the new Downtown zoning districts. The Downtown zoning standards will contain a residential capacity limit for the area of 9,000 units with unlimited density on Downtown properties. After new Downtown zoning is in place, additional capacity will be available on other vacant sites not identified in this sites inventory, allowing residential development where it was not previously permitted. There will be no density limits for Downtown properties once the new standards are in place. The City's development policies in Downtown emphasize infill development and a revitalized central core area as the primary activity center for Fresno and the region by locating substantial growth in the Downtown, and along the corridors leading to the Downtown. Revitalization projects in the city's Downtown include the \$20 million Fulton Mall project that will reintroduce car traffic to a 6-block section of Downtown and create a complete street, including a pedestrian-friendly corridor. In addition, planning is nearly complete for the area of Downtown within ¼ mile of the High Speed Rail Station, located at Mariposa and H Streets. Together the Fulton Street and High Speed Rail Station area projects are expected to serve as catalysts to revitalize Downtown. To facilitate higher density mixed use development in the downtown, an environmental impact report is being prepared to environmentally assess the pending downtown plans and code so that new development would not require further environmental analysis.

Flexibility with regard to development standards is available through use of the Planned Development (PD) Overlay District which allows for an alternate process to accommodate major and unique developments for residential, commercial, professional, or other similar activities. The PD overlay district is intended to provide assurances to a land developer to reduce the economic risks of a project while providing a flexible means of promoting comprehensive planning and orderly development.

The Fresno Urban Growth Management Process, adopted in 1976, is intended to identify the demands on municipal facilities, improvements, or services created by any proposed residential, commercial, industrial, or other type of development and to provide the means for satisfying such demands; to identify any deleterious effects of any such development and protect the city and its residents against such effects by minimizing the costs of municipal facilities, improvements, and services; and to maintain

a high quality of such facilities, improvements, and services. The City does not have adopted growth control measures besides the Urban Growth Management process, nor has the City ever adopted any moratoria and prohibitions against multi-family family housing or mixed-use projects. Rather, the City encourages the development of mixed-use projects. In 2008, the City amended the Zoning Ordinance to allow mixed-use projects in commercially zoned properties with flexible development standards. The City has taken further steps to encourage mixed-use development by creating new mixed-use designations in the General Plan and Development Code are strategically located on transit corridors and in higher density areas like Downtown. Density bonuses are provided for Transit Oriented Development near transit stations and any project proposed in a mixed-use district receives priority processing and streamlined review.

### ***Density Bonus***

The City of Fresno adopted a Density Bonus Ordinance (Article 22 of the Development Code) that is in accordance with the California Government Code. California Government Code Section 65915 provides that a local government shall grant a density bonus of at least 20 percent (five percent for condominiums) to a developer of a housing development agreeing to provide at least:

- Ten percent of the units for lower-income households;
- Five percent of the units for very low-income households;
- Ten percent of the condominium units for moderate-income households; or
- A senior citizen housing development;

Additional incentives, or financially equivalent incentive(s), are provided to developers that provide qualified donations of land, condominium conversions, and/or child care facilities.

The density bonus law also applies to senior housing projects and projects which include a child care facility. In addition to the density bonus stated above, the statute includes a sliding scale that requires:

- An additional 2.5 percent density bonus for each additional increase of one percent in very low-income units above the initial five percent threshold;
- A density increase of 1.5 percent for each additional one percent increase in low-income units above the initial 10 percent threshold; and
- A one percent density increase for each one percent increase in moderate-income units (in condominiums and Planned Developments) above the initial 10 percent threshold.

These bonuses reach a maximum density bonus of 35 percent when a project provides either 11 percent very low-income units, 20 percent low-income units, or 40 percent moderate-income units. In addition to a density bonus, developers may also be eligible for one or more development concessions or incentives. There is no density bonus maximum in Mixed-Use Districts.



In addition to the State Density Bonus program, Fresno offers a Transit-Oriented Development (TOD) Height and Density Bonus. The purpose of the TOD Height and Density Bonus is to provide flexibility for projects that promote walkability, livability, and transit ridership near stations for Bus Rapid Transit and other enhanced transit service. The TOD Height and Density Bonus may be used in combination with an Affordable Housing Density Bonus. The City also allows a project to exceed the maximum height and/or the maximum residential density of the Base District if all three of the following criteria are met:

- The project site is located entirely within an MX District.
- The project site is located within 500 feet of an existing or planned Bus Rapid Transit station or a station for a similar enhanced transit service as determined by the Review Authority.
- The project will provide one of the following public benefits:
  - a) A Public Plaza per Section 15-1104-E.1.c; or
  - b) Qualifying public art at the discretion of the Review Authority; or
  - c) 90 percent or greater frontage coverage along the street which features the Bus Rapid Transit route or other enhanced transit route.

For qualifying project sites, the bonus height may exceed the Base District height by 25 percent. The bonus density may exceed that of the Base District by 100 percent.

In general terms, the City's residential development standards do not act as a constraint to the development of new housing and affordable housing. The overriding constraint to the provision of affordable housing is the scarcity of available local, State and federal funding to help subsidize affordable housing projects

### ***Parking***

Parking is an important development regulation in communities. Adequate parking for residential projects contributes to the marketability of a development project, the safety of residents, and its appearance. Parking requirements for residential uses in Fresno are summarized in Table 4-11.

**Table 4-11: Parking Standards for Residential Use**

Use	Required Spaces	Notes
Single-unit residential up to 2 bedrooms	1 space per dwelling unit	Must be within a garage
Single-unit residential 3 or more bedrooms	1 space per dwelling unit	Must be within a garage
Second Dwelling Unit	1 covered space per 1-bedroom unit; 1 additional, covered or uncovered, parking space for 2 or more bedrooms in the second dwelling unit.	<ul style="list-style-type: none"><li>• A tandem parking space may also be used to meet the parking requirement for the Second Dwelling Unit, providing such space will not encumber access to a required parking space for the primary single-unit dwelling.</li><li>• An existing 2 vehicle garage and/or carport may not be provided in-lieu of these parking requirements unless the parking spaces are accessed from</li></ul>

**Table 4-11: Parking Standards for Residential Use**

Use	Required Spaces	Notes
		different garage doors.
Multi-Unit Residential (Studio)	1 space per unit; 0.75 spaces per unit in MX and CMS Districts.	One covered space shall be designated for each unit. One additional uncovered guest parking space shall be provided for every 4 units. In MX and CMS Districts, required parking shall be covered. One additional guest parking space must be provided for every 4 units for projects greater than 4 units.
Multi-Unit Residential (1- or 2- bedroom)	1 space per unit	One covered space shall be designated for each unit. One additional uncovered guest parking space must be provided for every 2 units. In MX and CMS Districts, required parking shall be covered. One additional guest parking space must be provided for every 4 units for projects greater than 4 units.
Multi-Unit Residential (3+ bedrooms)	1.5 spaces per unit	
Affordable Housing (studio, 1-, and 2- bedroom)	0.75 spaces per unit	1 covered space per unit plus 1 additional uncovered guest parking space for every 4 units.
Affordable Housing (3+ bedrooms)	1.5 spaces per unit	
Residential Care, Limited	None in addition to parking required for residential use.	
Residential Care, General	2 spaces for the owner-manager plus 1 for every 5 beds and 1 for each non-resident employee.	
Residential Care, Senior	1 space for every 7 residents plus 1 for each live-in caregiver. Facilities serving more than 15 residents shall also provide 1 space for each caregiver, employee, and doctor on-site at any one time.	
SRO	0.5 spaces per unit	

Source: City of Fresno Development Code 2016

Parking requirements do not constrain the development of housing directly. However, parking requirements may reduce the amount of available lot areas for residential development. The City determines the required number of parking spaces based on the type and size of the residential unit and has found the required parking spaces to be necessary to accommodate the number of vehicles typically associated with each residence. The City also provides a reduced parking requirement for affordable housing developments (up to 2-bedroom units), mixed-use residential uses (up to 1-bedroom units), specific multi-family developments with transit accessibility, and developments that have shared parking to encourage the development of such uses.

## Zoning for a Variety of Housing Types

### **Second Dwelling Units**

In Fresno, second dwelling units are permitted as an accessory use to single-unit dwellings, consistent with the Government Code Section 65852.2. Second dwelling units, backyard cottages, tiny houses and accessory living quarters may be established on any lot in any residential district where single-unit dwellings are existing or permitted. Only one second unit, backyard cottage, tiny house or accessory living quarters may be

permitted on any one lot. Minor deviations and/or variances to meet the minimum lot sizes are not permitted.

### ***Manufactured Housing***

State law requires local governments to permit manufactured or mobile homes meeting federal safety and construction standards on a permanent foundation in all single-family residential zoning districts (Section 65852.3 of the California Government Code). In Fresno, a manufactured/factory built house is considered to be a single-family detached dwelling unit and is treated as such.

### ***Residential Care Facilities***

Residential Care Facilities Limited (those serving 6 or fewer clients) are allowed by right in all zones that allow residential uses subject to the same development standards and permit processing standards as other residential uses in those zones, pursuant to the California Lanterman Developmental Disabilities Services Act. Residential Care Facilities General (providing care for more than 6 persons) are permitted by right in the RM-2 and RM-3 districts and conditionally permitted in the residential single-family districts (RS-1 to RS-5), the RM-1 district, and in the CMS district.

### ***Emergency Shelters***

Emergency shelters are allowed without discretionary review in the RMX, CG, RBP, IL, and PI zoning districts. Combined, these zone districts make up 16,236 acres of the city. In addition to the same land use regulations and development standards that apply to all development within the identified districts (e.g., lot size, setbacks, building height, etc.), an emergency shelter proposed in these district must comply with the following operational standards found in Section 15-2729 of the Development Code:

- **Number of Residents.** The number of adult residents, not including staff, who may be housed on a lot that is smaller than one acre shall not exceed the number of persons that may be accommodated in any hospital, elderly and long term care facility, residential, transient occupancy, or similar facility allowed in the same district.
- **Length of Occupancy.** Occupancy by an individual or family may not exceed 180 consecutive days unless the management plan provides for longer residency by those enrolled and regularly participating in a training or rehabilitation program.
- **Outdoor Activities.** All functions associated with the shelter must take place within the building proposed to house the shelter, except for children's play areas, outdoor recreation areas, parking, and outdoor waiting. Outdoor waiting for clients, if any, may not be in the public right-of-way, must be physically separated from the public right-of-way, and must be large enough to accommodate the expected number of clients.
- **Minimum Hours of Operation.** At least eight hours every day between 7 a.m. and 7 p.m.
- **Employee Presence.** On-site employee presence must be provided at all times.
- **Toilets.** At least one toilet must be provided for every 15 shelter beds, unless a greater number is required by State law.

- Management Plan. The operator of the shelter must submit a management plan for approval by the Director. The Plan must address issues identified by the Director, including transportation, client supervision, security, client services, staffing, and good neighbor issues.

### ***Supportive and Transitional Housing***

State law (AB 2634 and SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, transitional housing means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance (California Government Code Section 65582(h)). Supportive housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act of the Welfare and Institutions Code and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and people experiencing homelessness (California Government Code Sections 65582(f) and (g)).

Accordingly, State law establishes transitional and supportive housing as a residential use and therefore local governments cannot treat it differently from other similar types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). The City of Fresno Development Code specifies that transitional and supportive housing constitutes a residential use and are subject only to those restrictions that apply to other residential uses of the same type in the same district.

### ***Single Room Occupancy (SRO)***

Single room occupancy (SRO) hotels and/or boarding homes, which house between five and 15 guests, are collectively referred to as SROs. SRO units are one room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. Buildings that provide SRO dwellings are permitted by right in the CG zone and conditionally permitted in the RM-2 and RM-3 districts.

### ***Farmworker Housing***

The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The Employee Housing Act further defines

housing for agricultural workers consisting of 36 beds or 12 units be treated as an agricultural use and permitted where agricultural uses are permitted. The Fresno Development Code defines Agricultural Labor Housing as living accommodations for employees and their immediate families employed for the exclusive purpose of agricultural pursuits either on the premises or off site. It includes single- or multi-unit dwellings, including mobile homes and dormitories. Agricultural labor housing is permitted by right in the Buffer (B) district. The Buffer District is intended to separate urban uses from commercial agricultural uses to preserve long-term viable agricultural areas and intensive farming operations in adjacent areas. The Buffer District serves to prevent urban residential and related uses from developing near agricultural operations, and thereby infringing on full operation of farmland of importance. A program is included in the Housing Plan that directs the City to review the Development Code to ensure continued compliance with the Employee Housing Act.

## **Housing Accessibility for Persons with Disabilities**

### ***Land Use Controls***

Residential Care Facilities Limited (those serving 6 or fewer clients) are allowed by right in all zones that allow residential uses subject to the same development standards and permit processing standards as other residential uses in those zones, pursuant to the California Lanterman Developmental Disabilities Services Act. Residential Care Facilities General (those serving more than clients) are permitted by right in the RM-2 and RM-3 districts and conditionally permitted in the residential single-family districts (RS-1 to RS-5), the RM-1 district, and in the CMS district.

### ***Definition of Family***

The Development code does not define %family.+

### ***Reasonable Accommodation***

Building and development standards may constrain the ability of persons with disabilities to live in housing units that are suited to their needs. Reasonable accommodation refers to flexibility in standards and policies to accommodate the needs of persons with disabilities. The City's Development Code allows for special provisions that meet the needs of persons with disabilities without the need for variances. The City's Reasonable Accommodation Ordinance is codified in Article 57 of the Development Code. A request for reasonable accommodation may be submitted on an application form provided by the City or be made orally to the Director. Additionally, the City is required to help assist the applicant in preparing the application if needed. Generally, an application for a reasonable accommodation shall be granted in thirty days and must be granted if the following findings are made:

- The housing, which is the subject of the request for reasonable accommodation, is to be used by an individual protected under fair housing laws;
- The requested accommodation is necessary to make specific housing available to an individual protected under fair housing laws;

- The requested accommodation does not impose an undue financial or administrative burden on the City; and
- The requested accommodation does not require a fundamental alteration in the nature of a City plan, policy, rule, regulation, or code.

### ***Permits and Processing***

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. The City's requirements for building permits and inspections are the same as for other residential projects and are straightforward and not burdensome. City officials are not aware of any instance in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities.

As discussed above, group homes of six or fewer persons are allowed by right, as required by State law, in all districts that allow residential uses. No CUP or other special permitting requirements apply to such homes. There is no CUP requirement for group residential and residential care facilities of more than six persons in most residential districts with the exception of the RM-2 and RM-3 districts where they are permitted by right.

### **Universal Design Element and Retrofit Assistance**

In 2008, the Fresno City Council adopted a Universal Design Ordinance governing new construction or modification of City-subsidized housing using visitability and aging in place as guiding principles. The program includes the following four items: 1) one %no step+ entry, 2) accessible interior routes, 3) accessible kitchen counter space, and 4) ground floor facilities for units over 750 square feet in size. The City requires the incorporation of Universal Design features in affordable housing developments through a development agreement.

## **Conservation of At-Risk Housing**

Section 65583(a) of the Housing Element Law requires that there be an analysis of existing or potential %at-risk+ assisted housing developments, which are eligible to convert to market-rate housing over the next ten (10) years. The conversion may be due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. Assisted housing developments are multi-family rental housing projects that receive or have received government assistance under federal programs (i.e., State and local multi-family revenue bond programs, local redevelopment programs, the federal Community Development Block Grant Program, and HOME Investment Partnerships Program).

### **“At-Risk” Housing Units**

#### ***HUD Federally Assisted Projects***

Table 4-12 lists HUD-assisted, at-risk housing development projects within the Fresno city limits. The developments were originally built or renovated with commitments of various HUD Programs. Under the Project-Based Section 8, the federal government

City of Fresno  
Housing Element

provides the project owner with the difference between a tenant's rent contribution (which is limited to 30 percent of income) and a higher rent set by HUD. Unlike the Housing Choice Voucher (formerly Section 8), the subsidy is tied to the project and cannot be used by the tenant if they move elsewhere. These Project-based Section 8 contracts were set for a number of years, ranging from five to 40; however, most of the contracts allow owners to opt out after every five years. If the owner decides not to renew for the subsequent five-year term, the tenants would lose their rent assistance. Within the next ten years (2015-2025), 1,449 federally assisted housing units in the city of Fresno will be ~~at-risk~~ of converting to market rate housing, based on opt-out dates. However, it should be noted that other affordability covenants may be in place on individual projects that would preclude conversion. Many affordable housing developments are owned by nonprofit companies with missions to provide affordable housing in perpetuity, thus lessening the likelihood for conversion.

**Table 4-12: City of Fresno 2014 HUD Federally Assisted Projects At Risk**

Name	Address	Program	Assisted	Market	Total	Opt-Out Date	Owner
Bigby Villa	1329 E. Rev. Chester Riggins Ave., 93706	HUD/LIHTC/LMSA	177	3	180	12/31/17	For Profit
El Cazador Apartments	4851 Cedar Ave., 93726	Preservation	64	36	100	12/31/15	For Profit
Garland Gardens	3726 N. Pleasant Ave., 93705	HFDA/8	51	0	51	7/23/20	For Profit
Glen Agnes . Seniors	530 W. Floradora Ave., 93728	HFDA/8	149	0	149	4/02/19	Non Profit
Kearney-Cooley Plaza	720 W. Hawes Ave., 93706	LMSA	139	11	150	6/30/25	Non Profit
Kings Canyon Apartments	5271 E. Kings Canyon, 93727	LMSA	65	9	74	10/31/15	For Profit
Masten Towers	1240 Broadway Plaza, 93721	LMSA	204	0	206	7/31/22	Non Profit
Millbrook Park Apartments	7077 N. Millbrook Ave., 93720	8	75	0	75	5/1/20	For Profit
Pleasant Village Apartments	3665 N. Pleasant Ave., 93705	HUD/LIHTC/LMSA	98	1	99	9/30/18	For Profit
Silvercrest Fresno	1824 Fulton St., 93721	202/8	158	0	158	12/1/19	Non Profit
Sunnyside Glen Apartments	5700 E. Balch Ave., 93727	8	74	0	74	6/30/21	For Profit
Arbor Court - Disabled	4830 E. Laurel Ave., 93727	811	16	0	19	12/31/15	Non Profit
Sierra Gateway I . Seniors	5125 N. Marty Ave., 93727	202	79	0	80	4/30/15	Non Profit
Sierra Gateway II . Seniors	5125 N. Marty Ave., 93727	202	68	0	68	N/A	Non Profit
Twilight Haven II	1717 S. Winery Ave., 93727	202	32	0	32	6/1/20	For Profit

Source: City of Fresno 2015-2019 Draft Consolidated Plan; National Low Income Housing Coalition Preservation database, 2015.

### State Assisted Projects

The Low Income Housing Tax Credit (LIHTC) Program was created by the Tax Reform Act of 1986 to help as an alternate method of funding housing development or rehabilitation of existing housing for low- and moderate-income households, and has been in operation since 1987. In 2014, the sale of tax credits were generating between .94 to \$1.02 on the dollar, depending on the project. The proceeds generated by the sale of tax credits are used to leverage private capital for development of new construction or acquisition and rehabilitation of affordable housing.

The total amount of tax credits is determined by the development costs, and is used by the owner of a project. However, often, because of Internal Revenue Service (IRS) regulations and program restrictions, the owner of the property will not be able to use all of the tax credits, and therefore, many LIHTC properties are owned by limited partnership groups consisting of syndications. Often times, the owner becomes a general administrative partner responsible for management of the property operations. In this manner, a variety of companies and private investors participate, investing in housing development and in return receive credit toward their federal tax liability in return.

New tax credits must be used for new construction, rehabilitation, or acquisition and rehabilitation, and projects must also meet the following requirements:

- Twenty percent or more of the residential units in the project are both rent restricted and occupied by individuals whose income is 50 percent or less of area median gross income or 40 percent or more of the residential units in the project are both rent restricted and occupied by individuals whose income is 60 percent or less of area median gross income.
- Properties receiving tax credits must remain affordable for up to 55 years.

Table 4-13 lists active Housing Tax Credit Program projects within the city of Fresno. When the LIHTC program was initially created, it only required a 15-year compliance period. Therefore, properties developed between 1986 and 1989 only have 15-year compliance periods. Post-1989 developments have at least 30-year restrictions as required by the Revenue Reconciliation Act, and more recent tax credit properties must remain affordable for up to 55 years. However, the statute allows for owners to opt out by requesting that the state find a ~~qualified contract~~ purchaser to buy the property during the fourteenth year of the initial 15-year compliance period. If no purchaser is found, the owner may exit the LIHTC program. If a purchaser is found, or if the owner will not sell the property, the use restrictions extend to the full 30 years. HUD statistics indicate that most LIHTC properties (95 percent) remain affordable despite having passed the 15-year period of compliance with Internal Revenue Service (IRS) use restrictions. Generally, because tax credits are competitively allocated, states may impose more restrictive requirements than the Code minimum, e.g., greater percentages of restricted units, deeper income targeting and rent levels, or longer use restrictions.

Due to the complex nature of affordability expirations for LIHTC projects, all projects (with a total of 3,890 assisted units) placed into service between and up until 2010 are included in the at-risk analysis.



**Table 4-13: Low Income Housing Tax Credit Projects**

ID Number:	Project Name	Project Address	Zip Code	Total Units	Low-Income Units	Placed-In Service Year
CA-1987-060	Fresno Four-Plex	4833 E. Lane	93727	4	4	1987
CA-1991-187	Sequoia Knolls	3207 West Shields Ave.	93722	52	20	1991
CA-1992-040	Ross Gardens Apartments	2533 N. Marks Ave.	93722	140	139	1992
CA-1993-150	Sunshine Financial Group II	3460 N. Brawley	93722	14	14	1993
CA-1993-176	Annadale Housing Project	949 E Annadale Ave.	93706	222	222	1993
CA-1994-058	Maplewood	2060 E. Spruce Ave.	93720	100	99	1994
CA-1996-181	Sunshine Financial Group II - Dakota	3780 W. Dakota	93722	4	4	1996
CA-1997-928	Plaza Mendoza Apartments	1725 N. Marks Ave.	93722	132	131	1997
CA-1996-925	The Winery Apartments	1275 S. Winery Ave.	93727	248	248	1998
CA-1998-907	The Village at 9th Apartments	5158 N. Ninth St.	93710	240	239	1998
CA-1998-908	The Village at Shaw Apartments	4885 N. Recreation	93726	204	203	1998
CA-1998-973	Cedar Tree Apartments	1755 E. Roberts	93710	143	143	1998
CA-1998-960	Whispering Woods	5241 N. Fresno St.	93710	406	402	1998
CA-2000-165	The Parks at Fig Garden	4085 N. Fruit Ave.	93705	356	356	2000
CA-2001-390	Park West	2825 W. Alamos Ave.	93705	256	180	2001
CA-2001-920	The Californian	851 Van Ness Ave.	93721	217	216	2001
CA-2002-455	Villa Del Mar	3950 N. Del Mar Ave.	93704	48	37	2002
CA-2003-049	Village at Kings Canyon	962 S. Pierce Ave.	93721	48	47	2003
CA-2003-162	Summercrest	1160 E. Church Ave.	93706	72	70	2003
CA-2003-635	Westgate Gardens	846 E. Belgravia Ave.	93706	100	99	2003
CA-2004-060	Canyon Springs	6185 N. Figarden Dr.	93722	138	29	2004
CA-2004-684	Brierwood Court (Fresno Emerald Palms)	4402 W. Avalon Ave.	93722	73	72	2004
CA-2004-136	Geneva Village	1550 E. Church	93706	142	139	2004
CA-2006-120	Sandstone	1515 E. Jensen Ave.	93706	69	68	2006
CA-2007-096	Martin Luther King Sq.	911 E. Belgravia	93706	91	90	2007
CA-2007-050	Tanager Springs II	2147 S. Maple Ave.	93725	80	78	2007
CA-2007-149	Tanager Springs I	2187 S. Maple Ave.	93725	74	72	2007
CA-2007-834	Oak Park Senior Villas	2597 S. Richelle Ave.	93725	65	64	2007
CA-2008-830	Yosemite Village	811 W. California Ave.	93706	69	68	2008
CA-2009-053	Parc Grove Commons II	2674 E. Clinton Ave.	93703	215	213	2009
CA-2009-096	Summer Hill Place	430 B. St. (Site A)	93706	25	24	2009
CA-2009-096	Summer Hill Place	2150 S. Elm Ave. (Site B)	93706	25	25	2009
CA-2010-092	Renaissance at Trinity	520 S. Trinity St.	93706	21	20	2010
CA-2010-231	Pacific Gardens	5161 E. Kings Canyon Rd.	93727	56	55	2010

Source: California Tax Credit Allocation Committee (TCAC) Database. [www.treasurer.ca.gov/ctcac/projects.asp](http://www.treasurer.ca.gov/ctcac/projects.asp). Accessed November 19, 2015.

***Entities Interested in Participating in California's First Right of Refusal Program***

An owner of a multi-family rental housing development with rental restrictions (e.g., is under agreement with federal, State, and local entities to receive subsidies for low-income tenants), may plan to sell their ~~at~~ risk+property. The California First Right of Refusal Program allows these owners to accept a bona fide offer to purchase the property from one who does not intend to maintain required affordability and use restrictions (nonqualified entity), subject to the ~~First~~ Right of Refusal+process. This process requires the owner to: a) notify each qualified entity (bidder who intends to maintain affordability and use restrictions) of the terms and conditions on the pending offer, b) provide each qualified bidder 30 days to respond to the owner's notice (e.g., counteroffer), and c) accept a bid from the qualified entity (that is the same as that offered by the nonqualified bidder), unless the nonqualified entity agrees to maintain affordability and use restrictions. In addition, the owner (if now getting out-of-State affordability restricted agreements) must notify the State one year in advance of the intention to convert to market rate units or otherwise remove the affordability of the units. The State then notifies the jurisdiction of the subject location which in turn notifies and works with interested housing agencies to save the ~~at~~-risk+units.

The California Department of Housing and Community Development have listed eleven entities that may be interested in participating in California's First Right of Refusal Program.

<p>ACLC, Inc. 42 N. Sutter Street, Suite 206 Stockton, CA 95202</p>	<p>Foundation for Affordable Housing, Inc. 2847 Story Road San Jose, CA 95127</p>	<p>Long Beach Affordable Housing Coalition, Inc. 110 W. Ocean Boulevard, #350 Long Beach, CA 90802</p>
<p>Affordable Homes P.O. Box 900 Avila Beach, CA 93424</p>	<p>Fresno Co. Economic Opportunities Commission 3120 W. Nielsen Avenue, Suite 102 Fresno, CA 93706</p>	<p>Self-Help Enterprises P.O. Box 351 Visalia, CA 93279</p>
<p>Christian Church Homes of Northern California, Inc. 303 Hegenberger Road, Suite 201 Oakland, CA 94621</p>	<p>Fresno Housing Authority P.O. Box 11985 Fresno, CA 93776</p>	<p>The East Los Angeles Community Union (TELACU) 5400 E. Olympic Boulevard, Suite 300 Los Angeles, CA 90022</p>
<p>Community Housing Developers, Inc. 255 N. Market Street, Suite 290 San Jose, CA 95110</p>	<p>Housing Assistance Corporation P.O. Box 11863 Fresno, CA 93775</p>	

There are over 168 additional organizations, the majority of which are based in California that are interested and eligible to participate in the California's First Right of Refusal Program.

### ***Production of New Replacement Rental Housing***

Housing Element Law requires an analysis of ~~at-risk~~ units (those that could convert from affordable low-income to market-rate housing) and an estimate of the total cost to produce new rental housing comparable in size and rent levels to replace lost units. In Fresno, the estimated market value for the 5,339 units (federal and LIHTC) ~~at-risk~~ is roughly \$338 million<sup>3</sup> based on expected unit distribution and rents for the area. The cost of developing new housing depends on a variety of factors, including density, size of units, construction quality and type, location, and land cost. The total cost for replacement of an ~~at risk~~ housing unit is estimated to average about \$200,000<sup>4</sup>. Based on this figure, the total replacement cost for all 5,339 units is estimated at just over \$1 billion.

Housing Element Law also requires an estimated cost of preserving the units verses the construction of new units for replacement of assisted housing developments. Transferring ownership of the affordable units to a nonprofit housing organization is a viable way to preserve affordable housing for the long term and increase the number of government resources available to the project. State, local, or other funding sources also can be used to provide rental subsidies to maintain the affordability of at-risk projects. These subsidies can be structured to mirror the Housing Choice Voucher program, whereby the subsidy covers the cost of the unit beyond what is determined to be affordable for the tenant's household income (including a utility allowance) up to the fair market value of the apartment. Based on fair market rents for the area and affordability limits established by the State and federal government, the annual cost to provide rental subsidies to these 5,339 units could reach over \$24 million. Subsidies, to be used by low-income and very low-income households, could be at least partially met by a combination of tax credits, low cost financing, land write down, or other combinations of available resources. The precise financing plan would have to be determined at the time such units become ~~at-risk~~ since State, federal and local authorization for such assistance changes from year to year. Another option to preserve the affordability of at-risk projects is to restructure the financing of the projects by paying off the remaining permanent loan balance or writing down the interest rate on the remaining loan balance. The feasibility of this option depends on whether the complexes are too highly leveraged.

In recent years, the City has funded re-syndication projects that have expiring affordable covenants. A 2013 funded project was the Plaza Mendoza Apartments, a 132 multi-family housing project at McKinley Avenue and Marks Avenue in west central Fresno. The cost of purchase, rehabilitation, and re-syndication was estimated at \$108,717 per unit, considerably lower than new construction.

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<sup>3</sup> Source: MIG, Inc. 2015

<sup>4</sup> Source: MIG, Inc. 2015

The City's plan for preserving at-risk units is as follows:

- Under the Low Income Housing Preservation and Residential Homeownership Act (LIHPRHA), owners are required to provide a notice to the City of the intent to pre-pay at least one year in advance of the proposed conversion. The City Development and Resource Management Department, Housing and Community Development Division, is responsible for monitoring such notices. The City has monitored these projects since September of 1995, and will continue to monitor notices to determine if the owner desires to pre-pay the mortgages and/or convert the units to market-rate.
- In the event such notice is given, the City will assist with an application for possible funding from housing programs to preserve the units. The City of Fresno continues to support tax credit applications and uses its HOME Program funds to assist with gap financing. The City has also been proactive in creating community revitalization areas to make tax credit applications more competitive.
- The Housing and Community Development Division works with owners and interested community agencies to maintain the city's affordable housing stock. This could be in the form of subsidies, assignment and assumption, direct purchase and resale to an interested non-profit housing organization, the provision of technical assistance, or a combination of methods aimed at preserving affordable housing.

### ***Acquisition and Management***

Housing Element Law states that the analysis of at-risk units shall also identify public and private non-profit corporations known to the local government to have legal and managerial capacity, and interest in acquiring and managing assisted housing developments. Following is a representative list of such agencies. Other agencies may also be interested in participation and this list may expand over time.

Fresno Housing Authority. The Housing Authority owns hundreds of housing units and manages thousands more within the city. In Fresno County, the Housing Authority owns, manages, or provides assistance to persons living in their managed housing units. The Housing Authority also has two non-profit housing production and management organizations known as Silvercrest, Inc. and Better Opportunity Builders, Inc.

City of Fresno Housing and Community Development Division (HCD). The City of Fresno HCD administers the HOME Program and a portion of the CDBG Program funds to provide a multitude of housing programs including a new development/major rehabilitation of multi-family housing program, an owner-occupied housing rehabilitation program and a targeted area rehabilitation program. A down payment assistance program is offered utilizing the State's CalHome Program.

Coalition for Urban Renewal Excellence (CURE). Blighted homes in troubled neighborhoods are purchased, and in some cases donated, then rehabilitated with the help of the developer and building trades partners in the coalition. Once rehabilitated, the homes are sold to low and moderate-income families. CURE is positioned to rehabilitate six to ten houses per year.

Self Help Enterprises (SHE). This nonprofit provides a variety of housing assistance programs to lower income households, including a weatherization program, extensive rehabilitation program, a new housing construction program utilizing sweat-equity down payment assistance, and helps in seeking funding for water and wastewater systems. SHE also develops and owns multi-family projects.

Better Opportunity Builders (BOB). BOB is a non-profit arm of the Housing Authority and is an affordable housing production and management organization.

National Farmworker Service Center. This non-profit housing corporation provides housing and ancillary services for farmworkers and other related persons.

Of these agencies, the Housing Authority, CURE, SHE and BOB are regularly involved in the construction, management and oversight of multi- and single-family housing developments and could manage ~~at-risk~~ units in order to preserve the units if the need existed. Other agencies that are involved in acquisition and management include the Fresno County Economic Opportunities Commission, One by One Leadership, EAH, Inc., and the Be Group.

### ***Potential Funding***

Finally, Housing Element Law requires jurisdictions to identify and consider the use of all federal, State, and local financing and subsidy programs that can be used to preserve assisted housing developments for lower-income households. The following funding sources are available to the City for this purpose as replacement and new housing becomes necessary.

Community Development Block Grant (CDBG) Program - HUD provides an annual allocation to the City of Fresno of approximately \$7.7 million. A portion of these funds can be utilized for the replacement of substandard housing, rehabilitation of lower income owner-occupied and rental-occupied housing units, and other programs that assist households with incomes at or below 80 percent of median income.

Home Investment Partnerships (HOME) Program - The City received a HOME allocation of approximately \$1.66 million in fiscal year 2015 from HUD. These funds are used for rehabilitation, acquisition and/or new construction of affordable housing. The City must use 100 percent of its HOME funds to assist families with incomes at, or below, 80 percent of area median income.

Low Income Housing Preservation and Residential Homeownership Act (LIHPRHA). LIHPRHA requires that all eligible HUD Section 236 and Section 221(d) projects ~~at-~~

risk+ of conversion to market-rate rental housing through the mortgage prepayment option be subject to LIHPRHA Incentives. The incentives to owners include HUD subsidies that guarantee owners an eight percent annual return on equity. Owners must file a Plan of Action to obtain incentives or offer the project for sale to a) non-profit organizations, b) tenants, or c) public bodies for a 12-month period followed by an additional three-month sale to other purchasers. Only then are owners eligible to prepay the subsidized mortgages.

California Housing Finance Agency (CalHFA) - The mission of the various CalHFA homeownership programs is to provide affordable housing opportunities by offering below market interest rate mortgage programs to very low- to moderate-income first-time homebuyers. There are several programs offered to the prospective buyer: 1) Conventional Loans . offer interest only PLUS, 30- and 40-year fixed mortgages, and 30-year fixed government insured mortgages. 2) Down payment assistance . offers a number of programs designed to assist with down payments for homebuyers, such as the Affordable Housing Partnership program, the CalHFA Housing Assistance program, the California Homebuyers Down payment Assistance Program, the Extra Credit Teachers Home Purchase Program, the High Cost Area Home Purchase Assistance program, and the School Facility Fee Down payment Assistance program, and 3) Other programs to help builders, borrowers who are disabled, home-buying assistance to Section 8 voucher recipients and the Self-Help Builder Assistance program.

California Tax Credit Allocation Committee - The California Tax Credit Allocation Committee administers a federal 9 percent Low Income Housing Tax Credit program and a State 4 percent Low Income Housing Tax Credit program. Both programs were created to encourage private investment in affordable rental housing for households meeting certain income requirements. The Committee also administers a Farmworker Housing Assistance Program and a Commercial Revitalization Deduction Program.

California Debt Limit Allocation Committee (CDLAC) - Federal law limits how much tax-exempt debt a State can issue in a calendar year, with the cap determined by a population-based formula. CDLAC was created to set and allocate California's annual debt ceiling, and administers the tax-exempt bond program to issue the debt. Allocation is distributed among six program areas. The Qualified Residential Rental Project Program assists developers of multi-family rental housing units, the Single-Family Housing Program assists first-time homebuyers with their home purchase, the Exempt Facility Program helps finance solid waste disposal and waste recycling facilities and an Industrial Development Bond Project Program helps construct or expand existing manufacturing facilities.

Additionally, CDLAC allocates to the Extra Credit Home Purchase Program, which helps teachers and school staff purchase a home and the Student Loan Program to help students and families pay for their higher education.

California Community Reinvestment Corporation (CCRC) - CCRC provides long-term and bond financing for new construction, acquisition and rehabilitation and investment

funds to acquire at-risk housing. Programs are available for family, senior, mixed-use and special needs housing.

Affordable Housing Program (AHP) - Member banks of the Federal Home Loan system of San Francisco offers the AHP, which subsidizes the cost of owner-occupied housing for individuals and families with incomes at or below 80 percent of the area median income (AMI), and rental housing in which at least 20 percent of the units are reserved for households with incomes at or below 50 percent of area median income. The subsidy may be in the form of a grant or a below-cost or subsidized interest rate on an advance. AHP funds are primarily available through a competitive application program at each of the FHL Banks.

Multi-family Housing Program (MHP) - The State Department of Housing and Community Development provides deferred payment loans through the MHP program. The cost is based on 3 percent simple interest on the unpaid principal over a 55-year term. Local public entities, for-profit and non-profit corporations, and others are eligible applicants through the Program's Notice of Funding Availability process. Under this program, funds awarded may be utilized for new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing, and the conversion of nonresidential structures to rental housing. Projects are not eligible if construction has commenced as of the application date, or if they are receiving 9 percent federal Low Income Housing Tax Credits.

Affordable Housing and Sustainable Communities (AHSC) Program . The Budget Act of 2014 appropriated \$130 million from the Greenhouse Gas Reduction Fund (GGRF) to develop and implement the Affordable Housing and Sustainable Communities (AHSC) Program. Accompanying legislation (SB 862) apportions 20 percent of GGRF annual proceeds to the AHSC beginning in FY 2015-16. The GGRF is sometimes referred to as the "Cap and Trade Fund". The AHSC funds land use, housing, transportation, and land preservation projects to support infill and compact development that reduces greenhouse gas (GHG) emissions. These projects facilitate the reduction of the emissions of GHGs by improving mobility options and increasing infill development, which decreases vehicle miles traveled and associated greenhouse gas and other emissions, and by reducing land conversion, which would result in emissions of greenhouse gases. The program awards are determined with a points formula and 0.25 points are awarded to projects that directly implement a policy in a long range planning document (General Plan/Specific Plan, etc.), including new development on sites contained within the Housing Element's site inventory.

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## Chapter Five – 2008-2013 Program Accomplishments

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This chapter includes an analysis of program performance from the 2008-2013 Housing Element programs that worked toward the preservation and affordability of housing in Fresno.

State law (California Government Code Section 65588[a]) requires each jurisdiction to review its housing element as frequently as appropriate and evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal;
- The effectiveness of the Housing Element in attainment of the community's housing goals and objectives; and
- The progress in implementation of the Housing Element

This evaluation provides valuable information on the extent to which programs have achieved stated objectives and whether these programs continue to be relevant to addressing current and future housing needs in Fresno. The evaluation provides the basis for recommended modifications to policies and programs and the establishment of new housing objectives.



San Ramon Apartments, completed in 2014



Listed below in Table 5-1 is each 2008-2013 Housing Element Program, corresponding accomplishment, and its measurable success.

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
<p><b>Program 1.1.1a – Complete the Activity Center Study by January 1, 2010.</b> Complete the Activity Center Study (by January 1, 2010) to evaluate land use and transportation alternatives of the designated activities centers, intensity corridors and mid-rise high-rise corridor.</p>	<p>In 2007/2008 the City, in its effort to implement the General Plan, commissioned technical studies to determine the specific types of land uses and transportation systems that should be accommodated within the Activity Centers and along the Intensity Corridors. This information was incorporated into the updated General Plan, adopted in 2014 and the City's newly adopted (2015) Development Code, which includes development standards for three mixed-use districts.</p> <p>This program is implemented and is removed from the 2015 Housing Element.</p>
<p><b>Program 1.1.1.b – Complete a comprehensive update of the zoning ordinance</b> Complete a comprehensive update of the zoning ordinance, including adoption of the Form Based Codes where appropriate, by July 1, 2012.</p>	<p>The City adopted a comprehensive update of the Development Code in 2015.</p> <p>This program is implemented and is removed from the 2015 Housing Element.</p>
<p><b>Program 1.1.1.c – Adopt the land use plan for the Southeast Growth Area (SEGA)</b> Adopt the land use plan for the Southeast Growth Area prior to 2013.</p>	<p>The SEGA administrative draft plan was completed and aspects of this plan were incorporated into the updated General Plan adopted in 2014.</p> <p>This program is implemented and is removed from the 2015 Housing Element.</p>
<p><b>Program 1.1.2 – One Stop Processing</b> The City will improve the one stop process through the Development Partnership Center (DPC) to expedite processing of affordable housing projects.</p>	<p>The City of Fresno has established an easy to follow, customer-focused approval process, known as Business-Friendly Fresno. Business-Friendly Fresno establishes accountability and clear protocols and authority for decision-making that align with the General Plan, Development Code, and pre-zoning. The program establishes an optimized process based on the complexity of a project. Part of the Business-Friendly Fresno program includes the Development Review Committee established for the purpose of one stop processing and project streamlining. The City endeavors to meet and exceed the Business-Friendly Fresno processing deadlines for affordable housing projects.</p> <p>This program is implemented but will remain in the 2015 Housing Element to focus on continued streamlining of the development process and will be retitled Business-Friendly Fresno.</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
<p><b>Program 1.1.3 – Reduced Housing Costs</b> The City will continue assisting Low Income Housing Tax Credit (LIHTC) applicants and reduce inner city housing project application fees.</p>	<p>Between 2008 and 2014, the City evaluated 25 LIHTC applications and local developers were awarded over \$41 million in LIHTC. The City continues to provide reduced development fees as an incentive to promote development in the urban core.</p> <p>This program is an important component of the City's affordable housing strategy and will remain in the 2015 Housing Element.</p>
<p><b>Program 1.1.4 – Institutional Barriers</b> The City will identify land use policies, ordinances and procedures, and other potential local state and federal regulations that may act as institutional barriers to the development and/or rehabilitation of affordable housing and develop maximum densities for single- and multi-family housing developments.</p>	<p>The City adopted a comprehensive update of the Development Code in 2015 which included a comprehensive review of the City's development standards and procedures. The updated Development Code establishes maximum densities within each district that allows residential single- and multi-family housing developments. Setback regulations and other requirements were tailored to facilitate the achievability of maximum densities in the updated Development Code.</p> <p>This program is removed from the 2015 Housing Element and replaced with a policy directing the City to periodically review its development policies and processes to identify institutional barriers to the development and/or rehabilitation of affordable housing.</p>
<p><b>Program 1.1.5 – Complaint Referral</b> The City Housing and Community Development Division, through the Fair Housing Council of Central California (FHCCC), will refer inquiries and landlord/tenant complaints concerning housing discrimination to the applicable regulatory body (State Department of Fair Employment and Housing, HUD, or private council) for processing during the plan period. The FHCCC and the City will disseminate fair housing information citywide by sponsoring workshops, housing information fairs, and monitoring of affirmative marketing. The FHCCC will advertise fair housing laws and complaint procedures through literature displays at City and County offices, non-profit organizations such as Central California Legal Services, Lao Family Organizations, Fresno Interdenominational Refugee Ministries, Central Valley Regional Center, property management organizations, lenders, and other such organizations. Literature will be provided in English, Spanish, Hmong, Cambodian, Vietnamese and Lo. Additional information will be made available through radio, television and other media.</p>	<p>Between 2008 and 2014, the FHCCC received 3,959 complaints, 1,226 of which were escalated. The FHCCC also distributed thousands of pieces of information at over 50 agencies and schools and broadcast several radio programs.</p> <p>This program will remain in the 2015 Housing Element as furthering fair housing choice is an important City goal.</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
<p><b>Program 1.1.6 – Support of Current Law</b> The FHCCC shall sponsor workshops, housing information fairs, monitor affirmative marketing, and work closely with the State Department of Fair Employment and Housing. The City will use the FHCCC to support enforcement of Fair Housing Laws as expressed in Title 8 of the Civil Rights Act of 1968, as amended. The City will continue to allocate Community Development Block Grant (CDBG) Program funds in the amount of \$50,000 annually, as funding permitted.</p>	<p>Between 2008 and 2014 the City provided \$275,000 in funds to the FHCCC (an average of close to \$40,000 annually). The FHCCC uses the funds to support enforcement of Fair Housing Laws and also distributes fair housing literature to various agencies and schools and broadcasts fair housing related radio programs.</p> <p>This program will remain in the 2015 Housing Element but will be folded into a general fair housing program.</p>
<p><b>Program 1.1.7 – Fresno Green</b> Implement the Fresno Green Strategy, created in April, 2007 as the City's action plan for achieving sustainability.</p>	<p>A key implementation element of the Fresno Green Strategy was to finalize the incentive-based Green Building Program. This was codified under the City's previous zoning code and was carried forward in the recent (2015) comprehensive update to the Development Code. Fresno Green also called for the City to update the General Plan and zoning code to promote increased densities in activity centers. Under the City's General Plan, the City creates a comprehensive plan for increased densities downtown and along major transit corridors and promotes household conservation of electricity, and strives to change current trends of higher energy use in newer development in order to conserve resources for future growth. The City's Fresno Green Strategy promotes the construction of buildings and communities that are sustainable and environmentally responsible.</p> <p>Incentives for certified Fresno Green development projects include fee reductions and flexibility in developments standards. The Fresno Green Strategy also set a goal to build at least 20% of all future City-sponsored affordable housing units to meet an adopted Green building standard. The City encourages all projects to consider energy and water conservation measures. Parc Grove Commons, a City and Housing Authority partnership project that included 215 apartments in Phase 1 (2011) and 148 apartments in Phase 2 (2014) met green building standards.</p> <p>The program is still relevant to the City's sustainability goals and is included in the 2015 Housing Element.</p>
<p><b>Program 1.1.8 – Funding Energy Saving Improvements</b> The City will monitor H.R. 6. Energy Independence and Security Act legislation to determine if the City can use a portion of the \$10 billion dollar grant fund</p>	<p>Between 2008 and 2014 no applicable HR 6899 NOFAs were identified.</p> <p>While the program is still relevant to the City's sustainability goals, it will be folded into a general</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
for applicable housing related energy-efficient items.	energy conservation program in the 2015 Housing Element.
<p><b>Program 2.1.1 – Land Demand</b> The City will annually monitor the supply of vacant zoned and residential planned land to ensure that there is at least a continual 10-year supply of planned residential land and at least a 5-year supply of zoned land to meet the needs of all economic sectors of the community.</p>	<p>The 2008 Housing Element identified a variety of sites to meet the RHNA, and promised to rezone additional sites to increase capacity for affordable housing to meet the remaining unaccommodated need. In 2015, the City Council adopted a new Development Code (consistent with the General Plan adopted in 2014, the culmination of a four year comprehensive planning process) which established residential densities of up to 45 units per acre. The Development Code update resulted in an increased potential development capacity. The Zoning Map (adopted in 2016) implements the Development Code. In the interim, a translation table was adopted so that new zoning standards would apply throughout the city until the new Zoning Map was adopted. Although the City's vacant residential land inventory under the newly adopted Development Code has a capacity in excess of the City's 2008 RHNA commitment, the rezoning was completed at the end of previous planning period, providing limited opportunities for development during the planning period, as required by Housing Element law. As a result, the City of Fresno is addressing a carryover of 3,515 lower-income units from the 2008-2014 RHNA in addition to the new 2013 RHNA.</p> <p>The City reviewed all zone changes on sites identified in the 2008 Housing Element (zone changes 2008-2015) and confirmed that cumulatively on those sites, an increase in capacity occurred.</p> <p>To ensure adequate sites during the planning period, this program will remain in the 2015 Housing Element, to maintain an inventory of available housing sites.</p>
<p><b>Program 2.1.2 – Reduction in Density</b> The City shall comply with the density reductions of State Law.</p>	<p>The City of Fresno adopted a Density Bonus Ordinance in 2007 that was carried forward into Article 22 of the Development Code that is in accordance with California Government Code Section 65915.</p> <p>Granting density bonuses are allowed by State Law and represent a routine function of the City's planning and building departments. The Density Bonus provisions available to developers will be folded into a general affordable housing program that will also include the City's TOD Height and</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
<p><b>Program 2.1.3 – Central Community Plan Area Housing</b> The City shall ensure that priority and expedient processing is extended to construction of new housing in the Central Community Plan Area (generally bound by State Routes 41, 99, and 180) by processing completed (after Development Partnership acceptance) plans consistent with rezoning, and Site Plan Review and Conditional Use Permit applications for permitting within an average of 75 working days.</p>	<p>Density Bonus program.</p> <p>The City provides priority processing to all projects within the boundaries of the Downtown/Central Community Plan Area. Between 2008 and 2014, 9 projects were processed and several more have been discussed.</p> <p>The program is still relevant to the City's infill development goals and is included in the 2015 Housing Element.</p>
<p><b>Program 2.1.4 – Inner City Residential Development</b> The City shall continue to provide reduced application fees and priority processing for single- and multi-family projects within the Inner City Fee Program area, as referenced in the Municipal Code, to create approximately 700 housing units. The Inner City Development Policy permits residential projects in the eligible areas to be given processing priority and reduced processing fees from 10 to 50 percent.</p>	<p>The City continues to offer significantly reduced application processing fees to encourage residential development in designated Inner City Areas. Between 2008 and 2014, developments with a total of 240 units were approved. The target goal was not achieved; however, the City's recent comprehensive planning efforts to update the General Plan, Development Code, and provide new Downtown zoning standards are anticipated to further stimulate development interest in the Inner City area.</p> <p>The program is still relevant to the City's development goals within the Inner City Area and is included in the 2015 Housing Element.</p>
<p><b>Program 2.1.5 – Other Infill Housing</b> The City and RDA shall acquire sites to accommodate up to 300 units to be constructed as low-income affordable housing, utilizing non and for-profit builders, and housing agencies. The City was to review each State-issued NOFA for applicability to infill housing goals.</p>	<p>The RDA, through the Community Housing Partnership program with the Housing Authority, completed major rehabilitation and sale of 13 affordable units between 2008 and 2011. Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved pursuant to AB 1X 26. In addition, as reported in the 2014-2015 CAPER, the City has leveraged HOME funds to assist with the construction/rehabilitate an additional 288 affordable housing units (386 N. Park, Viking Village, Cedar Court, Fultonia West, and Laval). In prior years, additional funding supported Bridges at Florence, Sierra Gateway II, CityView, and Parc Grove Commons (resulting in an additional 427 affordable units).</p> <p>Due to loss of Redevelopment funding (and the lack of an alternative funding source), this program is removed from the 2015 Housing Element, and new programs pertaining to the identification of additional funding sources and local partnerships are included.</p>
<p><b>Program 2.1.6 – Multi-family Land Supply</b> The City will amend the Zoning Ordinance to establish a site plan review procedure for multi-family uses in multi-family zones on lots greater than 2 acres, by June 30, 2010.</p>	<p>The City's previous Development code required a CUP for multi-family developments on lots greater than two acres. The City adopted a comprehensive update of the Development Code in 2015. The new Development code does not require a CUP for</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
	<p>these developments in the city's Residential Multi-Family Districts.</p> <p>This program is implemented and is removed from the 2015 Housing Element.</p>
<p><b>Program 2.1.6a – Facilitate the Development of Multi-family Housing Affordable to Lower Income Households</b></p> <p>The City will identify and rezone approximately 500 acres of vacant land to the R-2 or R-3 zoning district, allowing exclusively residential uses by right without a Conditional Use Permit or other discretionary action and a minimum of 20 units per acre. Additionally, the City will identify and rezone approximately 200 acres of vacant land to the R-3 or R-4 zoning district, allowing exclusively residential uses by right without a Conditional Use Permit or other discretionary action and a minimum of 38 units per acre.</p>	<p>This program is no longer needed and is removed from the 2015 Housing Element.</p> <p>The Density Bonus provisions available to developers will be folded into a general affordable housing program.</p> <p>The Fresno City Council adopted a new Development Code which established residential densities of up to 45 units per acre in both the Multi Family High Density and the Regional Mixed Use districts. Densities in the Multi Family Urban Neighborhood district and in the Corridor/Center Mixed Use district were established to allow up to 30 units per acre. The Development Code update resulted in an increased potential development capacity. As a result, the City's vacant land inventory has a capacity of over 33,000 units in the appropriate income categories, and additional capacity (over 3,000 units) on underutilized sites. These figures meet both the City's 2008 unaccommodated need and the current RHNA planning numbers. Using the maximum densities allowed plus the potential increase from the City (Transit-Oriented Development (TOD) Height and Density Bonus) and State Density Bonus programs provide the opportunity for significantly higher capacity on these sites than was assumed in this conservative analysis.</p>
<p><b>Program 2.1.7 – Multi-family Land Supply</b></p> <p>The City will review applicable State legislation to ensure that its plans and Zoning Ordinance are consistent with State law. Whenever possible, the City's housing yield per acre shall be increased; conserving land, services, and costs. The City shall also review the potential higher yield through flexibility in or removal of governmental constraints such as street width, setback, coverage, and lot size requirement as set forth in the new policies and code changes.</p>	<p>The City conducted a comprehensive 4-year process to update the General Plan (adopted in 2014). Through that process, consistency with new State laws was achieved, and the City's total anticipated residential development potential was increased. Through the General Plan update, an additional 4,355 acres now permit residential development, and the anticipated population build-out increased by nearly 23 percent. Much of this population is anticipated to be located in infill/high density areas, including Bus Rapid Transit corridors and Downtown.</p> <p>To implement the General Plan, the City adopted a comprehensive update of the Development Code in 2015 which included a comprehensive review of the</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
	<p>City's development standards. The updated Development Code establishes residential densities of up to 45 units per acre in three Downtown districts, the Multi Family High Density district, and the Regional Mixed Use district. Densities in the Multi Family Urban Neighborhood district and in the Corridor/Center Mixed Use district were established to allow up to 30 units per acre. The Development Code was crafted to ensure that development standards allowed maximum densities to be achieved.</p> <p>The City has reviewed all zone changes on sites identified in the 2008 Housing Element (zone changes 2008-2015) and confirmed that cumulatively on those sites, an increase in capacity occurred.</p> <p>This program is removed from the 2015 Housing Element and replaced with a policy directing the City to review applicable State legislation to ensure that its plans and Zoning Ordinance are consistent with State law.</p>
<p><b>Program 2.1.7a – Maximum Density</b> Whenever possible, density shall be increased, conserving land, services and costs. The City Development and Resource Management Department was to review its development standards such as street width, setback, coverage, height, parking and lot size requirements and amend zoning and development standards in the R-3 and R-4 zoning districts, and facilitate maximum densities.</p>	<p>This program is no longer needed and is removed from the 2015 Housing Element.</p> <p>The City adopted a comprehensive update of the Development Code in 2015 which included a comprehensive review of the City's development standards. The updated Development Code establishes residential densities of up to 45 units per acre in the Multi Family High Density and the Regional Mixed Use districts. Densities in the Multi Family Urban Neighborhood district and in the Corridor/Center Mixed Use district were established to allow up to 30 units per acre. Prior to the comprehensive update of the Development Code, the West Community Plan Area was amended to allow more development at R-3 densities.</p>
<p><b>Program 2.1.8 – Mixed-Use Zoning</b> The City shall continue to encourage mixed-use developments through its Activity Center Study, which is analyzing the activity centers proposed in Exhibit 6 of the 2025 General Plan and developing density and design recommendations for these mixed-use nodes. In addition, the City was to prepare a Formed Based Zoning Code, which will provide design standards for the City's activity centers and transit corridors.</p>	<p>This program is no longer needed and is removed from the 2015 Housing Element.</p> <p>In 2007/2008 the City, in its effort to implement the General Plan, commissioned technical studies to determine the specific types of land uses and transportation systems that should be accommodated within the Activity Centers and along the Intensity Corridors. This information was incorporated into the updated General Plan, adopted in 2014. In 2008, the City also adopted a</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
	<p>Mixed Use ordinance that permitted mixed use development with a conditional use permit on commercially zoned sites with no density limit.</p> <p>The City adopted a comprehensive update of the Development Code in 2015 which includes development standards for three mixed-use districts. In mixed use districts, residential stand-alone uses are now allowed by right and minimum densities are established to ensure that development is consistent with the character and density established in the Fresno Development Code. The new Development Code reclassified 800 acres of land to Regional Mixed Use with a density of 30-45 units per acre. This mixed use zone district did not exist prior to the adoption of the Code.</p>
<p><b>Program 2.1.9 – Farmworker Housing Funding and Development</b> The City Housing and Community Development Division shall partner with and encourage local and State non-profits to seek funding for development of new farmworker housing projects.</p>	<p>Between 2008 and 2014 no funding sources for this program were identified.</p> <p>Seeking funding for development of affordable or special needs housing projects is still relevant to the City's affordable housing goals. In the 2015 Housing Element this program is folded into a general affordable housing program.</p>
<p><b>Program 2.1.10 – Emergency Shelter Grant Allocations</b> The City Housing and Community Development Division shall use Emergency Shelter Grant (ESG) Program funds to support needed social services and review applications annually. Additionally, staff will work with the 10 x 10 Affordable Housing subcommittee for Urban Reinvestment, In-Fill, and Transitional Housing Developments to proactively address the housing issues of our urban core.</p>	<p>The Emergency Solutions Grant (ESG) has replaced the former Emergency Shelter Grant from HUD. ESG funds are used to provide homeless prevention services and to support the operation of emergency shelters for homeless individuals. Historically, the City receives approximately \$389,000 in ESG funds.</p> <p>The ESG program is still relevant to the City's affordable housing goals and is included in the 2015 Housing Element. The 10 x 10 Affordable Housing Committee was eliminated in 2009 and therefore that portion of the program will be removed.</p>
<p><b>Program 2.1.11 – Zoning for Emergency and Homeless Shelters</b> The City Development and Resource Management Department shall, within one year of submission of the Housing Element, identify a zoning district or districts where emergency and homeless shelters were allowed as a permitted use, in compliance with State Government Code Section 65583(a)(4), and revise its Zoning Ordinance accordingly. Furthermore, the City will adopt the State definition which states that emergency and homeless shelters were to be defined as housing with minimal supportive services for homeless persons that has</p>	<p>This program is no longer needed and is removed from the 2015 Housing Element.</p> <p>The City adopted a comprehensive update of the Development Code in 2015. Consistent with State law, emergency shelters are allowed without discretionary review in the RMX, CG, RBP, IL, and PI zoning districts. In addition to the same land use regulations and development standards that apply to all development within the identified districts (e.g., lot size, setbacks, building height, etc.), an emergency shelter proposed in these district must comply with operational standards found in Section</p>



**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
occupancy requirements of six months or less by a homeless person and that is not withheld due to a client's inability to pay.	15-2729 of the Development Code and allowed under State law.
<p><b>Program 2.1.12 – Zoning for Special Needs Housing</b></p> <p>The City shall, within one year of submission of the Housing Element, review the Zoning Ordinance for consistency with State Government Code 65583(a)(7) regarding appropriate levels of permit review for special needs housing development applications. %Special needs housing+means housing for disabled persons with special or supportive services that allow them to live independently.</p>	<p>This program is implemented and is removed from the 2015 Housing Element and replaced with a policy addressing special needs housing.</p> <p>The City adopted a comprehensive update of the Development Code in 2015 and addressed State laws related to residential care facilities and supportive and transitional housing. Residential Care Facilities Limited (those serving 6 or fewer clients) are allowed by right in all zones that allow residential uses subject to the same development standards and permit processing standards as other residential uses in those zones, pursuant to the California Lanterman Developmental Disabilities Services Act. Residential Care Facilities General (those serving more than 6 clients) are permitted by right in the RM-2 and RM-3 districts and conditionally permitted in the residential single-family districts (RS-1 to RS-5), the RM-1 district, and in the CMS district.</p> <p>Also, the City of Fresno Development code specifies that transitional and supportive housing constitutes a residential use and are subject only to those restrictions that apply to other residential uses of the same type in the same district.</p> <p>Reasonable accommodation procedures are also included in the updated Development Code.</p>
<p><b>Program 2.1.13 – Transitional and Supportive Housing</b></p> <p>The City shall continue to utilize available funds and/or seek funding to support the Fresno-Madera Continuum of Care, a local collaborative of homeless services providers, and construct a minimum of 100 transitional housing units. Additionally, the City shall, within one year of submission of the Housing Element, amend its zoning ordinance to identify the development of transitional and/or supportive housing as a residential use, and only subject to those restrictions that apply to other residential uses of the same type in the same zone, in compliance with State law.</p>	<p>This program is no longer needed and is removed from the 2015 Housing Element. A policy will remain that directs the City to support the Fresno-Madera Continuum of Care.</p> <p>The City adopted a comprehensive update of the Development Code in 2015 and addressed State laws related to the siting of supportive and transitional housing. The City of Fresno Development Code specifies that transitional and supportive housing constitute a residential use and are subject only to those restrictions that apply to other residential uses of the same type in the same district.</p> <p>Each year, the City allocates ESG funds to assist with shelter and outreach, homelessness prevention, and rapid rehousing, helping homeless persons make the transition to permanent housing</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
	and independent living.
<p><b>Program 2.1.14 – Single Room Occupancy Housing</b> The City will amend the Zoning Ordinance, within one year of submission of the Housing Element, to comply with the State law on single room occupancy to permit development, by right, in appropriate zone districts.</p>	<p>This program is no longer needed and is removed from the 2015 Housing Element.</p> <p>The City adopted a comprehensive update of the Development Code in 2015 and addressed the siting of on single room occupancy (SRO) units. The City of Fresno Development code specifies that buildings that provide SRO dwellings are allowed by right in the CG district.</p>
<p><b>Program 2.1.15 – Very-Low Income Large Family Single- and Multi-Family Housing</b> The City, RDA and Housing Authority, shall investigate funding sources, develop partnerships and apply for available local, State, and federal funds to assist in the production of 400 large family units.</p>	<p>Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved pursuant to AB 1X 26. As reported in the 2014-2015 CAPER, the City has leveraged HOME funds to assist with the construction of an additional 288 units of affordable housing (386 N. Park, Viking Village, Cedar Court, Fultonia West, and Laval). In prior years, additional funding supported Bridges at Florence, Sierra Gateway II, CityView, Parc Grove Commons and Plaza Mendoza (resulting in an additional 427 affordable units).</p> <p>Due to loss of Redevelopment funding (and the lack of an alternative funding source), the RDA source is removed from the 2015 Housing Element but the general intent of this program will be folded into a general affordable housing program.</p>
<p><b>Program 2.1.16 – Extremely Low-, Very Low- and Low-Income Senior Housing</b> The City, RDA, and Housing Authority, shall seek and apply to funding sources and partner with local and statewide non-profits and for-profits in applying for funds and encouraging the construction of at least 400 units for extremely low-, very low-, and low-income seniors (typically age 65 years and over; may vary by funding source and program).</p>	<p>Between 2008 and 2014, the City provided \$4.4 million in funding to help in the development of six senior housing developments.</p> <p>Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved pursuant to AB 1X 26. As reported in the 2014-2015 CAPER, the City has leveraged HOME funds to assist with the construction of an additional 288 units of affordable housing (386 N. Park, Viking Village, Cedar Court, Fultonia West, and Laval). In prior years, additional funding supported Bridges at Florence, Sierra Gateway II, CityView, Parc Grove Commons and Plaza Mendoza (resulting in an additional 427 affordable units).</p> <p>Due to loss of Redevelopment funding (and the lack of an alternative funding source), the RDA source is removed from the 2015 Housing Element but the general intent of this program will be folded into a general affordable housing program.</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
<p><b>Program 2.1.17 – Other Extremely Low- and Very Low-Income Housing</b> The City, RDA, Housing Authority in conjunction with non- and for-profit developers, shall provide financial assistance to develop, at least 1,000 units for other extremely low- and very low-income households. Additionally, staff will partner with the 10 x 10 Affordable Housing subcommittee for Expanding Affordable Housing Resources and New Financing by continuing to seek and support additional housing resources, develop guidelines for the implementation of a local and regional housing trust fund, and identify funding priorities for the City's set aside housing trust fund.</p>	<p>Between 2008 and 2014, the City provided \$7.4 million in funding to help in the development of 5 housing developments. Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved pursuant to AB 1X 26.</p> <p>Due to loss of Redevelopment funding (and the lack of an alternative funding source), the RDA source is removed from the 2015 Housing Element but the general intent of this program will be folded into a general affordable housing program. The 10 x 10 Affordable Housing Committee was eliminated in 2009.</p>
<p><b>Program 2.1.18 – Inclusionary and Alternative Housing Policy Programs</b> The City's 10 x 10 Affordable Housing Strategy shall investigate alternative housing policies and comparable programs to help increase the supply of affordable housing. Also, the RDA, as required by the California Redevelopment Law, shall utilize mandated inclusionary housing policies to assist in the production of low- to moderate-income housing units.</p>	<p>Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved pursuant to AB 1X 26. The 10 x 10 Affordable Housing Committee was eliminated in 2009.</p> <p>Due to loss of Redevelopment (and the lack of an alternative funding source), the RDA source is removed from the 2015 Housing Element. The intent of the program will be folded into a general affordable housing program.</p>
<p><b>Program 2.1.19 – Proposition 1C Program</b> The City shall review published Proposition 1C notices for funding availability and cause applications to be prepared for various City housing programs, projects, and activities.</p>	<p>In 2008, 2010, and 2011, the City applied for and received \$1.5 million (total \$4.5 million) in CalHome Program funds to augment its First-Time Homebuyer Program and Home Improvement Program.</p> <p>In 2009, two projects were awarded a total of \$7 million in Prop 1C Program funds. In 2010, the City applied for and received \$856,525 in Housing Related Parks Program funds to make improvements to the Ted C. Wills Community Center and Dickey Park. In 2013, the City applied for and received \$1.5 million in Housing Related Parks Program funds to make improvement to Pilibos Park, Radio Park, and Holmes Park.</p> <p>In the 2015 Housing Element this program is folded into a new program calling for partnerships with affordable housing developers and pursuing funding sources for housing programs, projects, and activities.</p>
<p><b>Program 2.1.20 – Strengthening Partnerships with Affordable Housing Developers</b> The City and RDA shall continue the on-going efforts to strengthen partnerships and relationships with affordable housing developers by encouraging funding applications to applicable funding sources,</p>	<p>The City continues to partner with local developers in an effort to leverage available public and private funding.</p> <p>Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
<p>providing staff expertise, encouraging local capacity building and attracting large investors to facilitate the construction of new affordable housing units and incentivize self-help type single-family housing construction for extremely low-income households.</p>	<p>pursuant to AB 1X 26.</p> <p>Due to loss of Redevelopment (and the lack of an alternative funding source), the RDA source is eliminated and the program modified in the 2015 Housing Element to focus on continued coordination with the development community to facilitate the development of affordable housing.</p>
<p><b>Program 2.1.21 – Zoning for Agricultural Employees (Farmworker) Housing</b> The City Development and Resource Management Department shall, within one year of submission of the Housing Element, adopt a program to amend the Zoning Ordinance to bring into compliance with Health and Safety Code Sections 170021.5, 17021.6 and Government Code Sections 51238 and 51238.5 to encourage and facilitate a variety of housing types of agricultural employees.</p>	<p>The Fresno Development Code defines Agricultural Labor Housing as living accommodations for employees and their immediate families employed for the exclusive purpose of agricultural pursuits either on the premises or off site. It includes single- or multi-unit dwellings, including mobile homes and dormitories. Agricultural labor housing is permitted by right in the Buffer (B) district.</p> <p>This program will be replaced by a program directing the City to review the Development Code to ensure continued compliance with the Employee Housing Act.</p>
<p><b>Program 2.1.22 – Single Room Occupancy Housing</b> The City shall, within one year of submission of the Housing Element, amend the Zoning Ordinance to comply with State law on single room occupancy housing, to permit them, by right, in the appropriate zone district.</p>	<p>This program is implemented and is removed from the 2015 Housing Element.</p> <p>The City adopted a comprehensive update of the Development Code in 2015 and addressed the siting of single room occupancy (SRO) units. The City of Fresno Development code specifies that buildings that provide SRO dwellings are permitted by right in the CG zone and conditionally permitted in the RM-2 and RM-3 districts.</p>
<p><b>Program 3.1.1 – Comprehensive Code Enforcement</b> The City Community Revitalization Division (formerly Code Enforcement) shall set a goal of assertively conducting targeted neighborhood inspections of 35,000 housing units for potential health and safety issues and advise on available financial assistance (7,000 units annually in targeted neighborhoods. Additionally, the Community Revitalization Division, Safe Housing and Vacant Structure Team, and all Area Teams as needed, will continue to improve neighborhoods throughout Fresno and increase livability by creating safe and healthy conditions, removing blight, educating citizens, promoting pride of ownership and building collaborative relationships with the community.</p>	<p>Between 2008 and 2014, the City's Code Enforcement Division completed over 120,000 inspections.</p> <p>This program will remain in the 2015 Housing Element with modified quantifiable objectives consistent with available funding.</p>
<p><b>Program 3.1.2 – Neighborhood Infrastructure</b> The City Public Works Department shall commit its best efforts to provide services, within budgetary allocations, for neighborhood infrastructure such as</p>	<p>Between 2008 and 2014, the City completed over 200 neighborhood infrastructure projects costing over \$146 million. Projects included road, traffic signal, water, and sewer infrastructure related</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
<p>curbs, gutters, sidewalks, streets, ramps, driveway approaches, curb cuts, wheelchair ramps, and street lights necessary to accommodate existing units and facilitate development of undeveloped or underdeveloped properties, to assist at least 2,500 households.</p>	<p>projects.</p> <p>Ensuring neighborhood infrastructure maintenance is an important City goal. This program will remain in the 2015 Housing Element.</p>
<p><b>Program 3.1.3 – Public Utilities Sewer and Water Deficiencies</b></p> <p>The City Department of Public Utilities will develop written policies and procedures that ensure water and sewer services are to be provided as a priority for development that included units affordable to lower income households, contingent on the development application's compliance with all entitlement requirements. Additionally, as is current practice, the City will ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application's compliance with all entitlement requirements.</p>	<p>The City of Fresno Department of Public Utilities has executed a priority wastewater collection and water services policy for affordable housing development.</p> <p>This program will be modified in the 2015 Housing Element to remove the program components that have already been implemented.</p>
<p><b>Program 3.1.4 – Enhance Police Service to High Crime Neighborhoods</b></p> <p>The City Police Department shall continue to focus on strategies to reduce Part I crimes. In addition, the Department will continue its prevention and intervention programs such as the Police Activities League, Mayor's Gang Prevention Initiative and the Lifeskills Program in an effort to reduce crime in high-crime neighborhoods.</p>	<p>The Police Department addressed crimes through their use of proactive programs. Most years between 2008 and 2014, the City saw a reduction in crimes reported.</p> <p>Reducing crime and ensuring safety is an important City goal. This program is included in the 2015 Housing Element.</p>
<p><b>Program 3.2.1 – Housing Rehabilitation</b></p> <p>The City, RDA, and Housing Authority shall utilize information from the Housing Quality Survey to rehabilitate 2,000 single- and multi-family dwelling units (1,500 minor, 300 moderate, 120 substantial, and 80 emergency repairs).</p>	<p>Between 2008 and 2014, 258 weatherization, senior paint, emergency grant, and home rehabilitation projects were completed. These projects have been funded primarily with CalHome and CDBG funds. Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved pursuant to AB 1X 26.</p> <p>Due to loss of Redevelopment (and the lack of an alternative funding source), the RDA source is eliminated and the program modified in the 2015 Housing Element to focus on non-RDA funding and objectives that reflect current and anticipated funding levels.</p>
<p><b>Program 3.2.2 – Housing Replacement</b></p> <p>The City in partnership with the RDA and the Housing Authority shall replace or reconstruct at least 60 dilapidated units that suffer from excessive neglect and were not fit for human habitation.</p>	<p>Between 2008 and 2014, no dilapidated units were replaced. Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved pursuant to AB 1X 26.</p> <p>Due to loss of Redevelopment (and the lack of an alternative funding source), the RDA source is eliminated and the program is removed from the</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
<p><b>Program 3.2.3 – Home Buyer Assistance</b> The City shall set aside funds for the first-time home buyer program to assist 500 households during the planning period.</p>	<p>2015 Housing Element.</p> <p>Between 2008 and 2014, 111 first time homebuyers were assisted with funding from CalHome and the Neighborhood Stabilization Program.</p> <p>This program will remain in the 2015 Housing Element with modified objectives that reflect current and anticipated funding levels.</p>
<p><b>Program 3.2.4 – Redevelopment Housing Sites</b> The City and the RDA shall acquire 30 blighted properties to develop as new residential housing.</p>	<p>Between 2008 and 2011, the RDA acquired 20 blighted properties. Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved pursuant to AB 1X 26.</p> <p>Due to loss of Redevelopment (and the lack of an alternative funding source), the RDA source is eliminated and the program removed from the 2015 Housing Element.</p>
<p><b>Program 3.2.5 – Comprehensive Housing Quality Survey</b> The City Development and Resource Management Department will conduct a comprehensive housing quality survey during the planning period. The findings shall be incorporated into the upgraded Geographic Information System (GIS) to track housing conditions and permits issued for repair.</p>	<p>This program was canceled due to a lack of funding.</p> <p>This program is removed from the 2015 Housing Element.</p>
<p><b>Program 4.1.1 – At-Risk Housing</b> The City and RDA shall participate in securing the continued affordability of at-risk housing units through preservation and replacement. The City will continue to partner with the Fresno area office of the U.S. Department of Housing and Urban Development, local housing developers and the California Housing Partnership Corporation to pro-actively identify at-risk housing units, and engage owners in developing viable plans to conserve unit affordability. The at-risk housing committee will meet monthly, or more frequently as needed, to prepare strategies for conserving at-risk units. Additionally, the City will update its condominium conversion ordinance in 2008. As the City identifies at-risk units that are considering converting to market rate, the owner or proposed future owner will be encouraged and assisted in applying for local, State or federal housing funds for housing acquisition and/or rehabilitation to assist in the preservation of the at-risk housing.</p>	<p>Between 2008 and 2014, no opt-out notices were received from the City.</p> <p>The newly adopted Development Code (2015) includes standards for new condominiums and condominium conversions and as such this objective is removed from the program.</p> <p>A program addressing affordable housing at risk of conversion to market rate will remain in the 2015 Housing Element.</p>
<p><b>Program 4.1.2 – Preventing and Alleviating Foreclosure</b> The City Development and Resource Management Department will address the foreclosure crisis by applying for funding programs to alleviate foreclosure, partnering with local foreclosure counseling service providers to assist families from</p>	<p>The City continues to partner with the local Community Housing Council which provides counseling services to homeowners facing foreclosures. The City also adopted two ordinances related to foreclosed properties. Between 2008 and 2011 the City received \$14.1 million in Neighborhood Stabilization funds to provide</p>

**Table 5-1: Program Performance (2008-2013 Housing Element)**

2008 Housing Element Program	Program Performance and Continued Appropriateness
<p>entering foreclosure procedures and enacting local ordinance to incentivize quick alleviation of already foreclosed homes. The City Housing and Community Development Division will monitor implementation of the Neighborhood Stabilization Act (H.R. 5818). The City will actively partner with the Community Housing Council's Housing Resource Center. In addition, within one year of the adoption of the Housing Element, the City will update its Vacant Building Ordinance. In addition, within one year of the adoption of the Housing Element, the City will update its Vacant Building Ordinance to better address the problems associated with buildings that have been vacated due to foreclosure. The changes include, but are not limited to, shortening the time allowed between citation issuance and an increasing fee scale per citation. These changes are meant to motivate the owners of the vacant buildings to address the issues associated with abandonment in a more timely and efficient manner. Thereafter the City will work with local community groups to prepare a public education and outreach campaign addressing the resources available to avoid and/or alleviate foreclosures.</p>	<p>foreclosure assistance.</p> <p>In 2015, the City Council amended the Vacant Blighted Building Ordinance, including an amendment to require all buildings that have been or expected to be vacant for longer than 30 days to be registered with the City. The amendment also established a daily fine (rather than a fixed fee fine) to encourage abatement.</p> <p>As the foreclosure crisis has eased relative to the previous planning period, and funding for foreclosure assistance is not as readily available, this program will be replaced in the 2015 Housing Element with a policy encouraging support and coordination of agencies providing foreclosure services.</p>
<p><b>Program 4.2.1 – Providing Relocation Services as Needed</b></p> <p>The City Housing and Community Development Division and the RDA shall be legally responsible for the relocation of individuals and families displaced due to redevelopment activities. The City was to provide relocation assistance as prescribed by law.</p>	<p>Effective February 1, 2012, all redevelopment agencies in the State of California were dissolved pursuant to AB 1X 26.</p> <p>Due to loss of Redevelopment (and the lack of an alternative funding source), the RDA source is eliminated and a revised program will be reflected in the 2015 Housing Element.</p>
<p><b>Program 4.3.1 – Required Reporting by Regional Housing Need Allocation Income Category</b></p> <p>To ensure standardized and categorized reporting in the Housing Element annual update to the California Department of Housing and Community Development on the targeted income and special groups, all parties reporting accomplishment data to the City shall track housing program accomplishments by income levels.</p>	<p>Annual Reports submitted to the State throughout the planning period reflected tracked accomplishments by the appropriate income categories.</p> <p>Tracking accomplishment data is a routine function of City staff therefore this program is no longer needed and is removed from the 2015 Housing Element as the program objective was met.</p>
<p><b>Program 4.3.2 – Citywide Public Services Processing for Affordable Housing</b></p> <p>The City shall provide a copy of the Housing Element to City Departments and responsible agencies to ensure processing for proposed developments that include affordable housing units to lower-income households.</p>	<p>This program accomplishment was met and will remain in the 2015 Housing Element.</p>

Table 5-2 summarizes the quantified objectives contained in the City's 2008-2013 Housing Element, and compares the City's progress in fulfilling these objectives. The City recognizes that it had limited resources to address the varied affordable housing needs in the community. As part of the 2008-2013 Housing Element, the City established a set of quantified objectives for housing construction, rehabilitation, and preservation. The City met a significant portion of construction objectives; however, the 2008 rehabilitation goals fell short. The City met its conservation goals, as no affordable units were converted during the planning period.

**Table 5-2: Summary of 2008-2013 Quantified Objectives and Progress**

Objectives	Income Levels				Total
	Very Low	Low	Moderate	Above Moderate	
RHNA Objectives					
Goal(a)	5,197	3,355	3,312	9,121	20,967
Progress	738 (14%)	835 (25%)	77 (2%)	12,665 (139%)	14,315 (94%)
Rehabilitation Objectives					
Goal(b)	2,000		--	--	2,000
Progress	324 (16.2%)		--	--	324 (16.2%)
Conservation/Preservation Objectives					
Goal(c)	804		--	--	
Progress	804(100%)		--	--	804(100%)

Notes:

- a. Represents the City's RHNA for the 2006-2014 planning period.
- b. Represents objectives for Housing Rehabilitation Program
- c. Refers to maintenance of the existing affordable housing stock at risk of conversion to market rate housing (804 units as indicated in the 2008 Housing Element).



# CHAPTER SIX – HOUSING PLAN

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## Housing Plan

The intent of the Housing Element is to ensure that the City makes a good effort and commits available resources to meeting the housing needs of all economic segments of the community. The Housing Element sets forth long-term goals and policies, as do other General Plan Elements, but also provides specific programs to meet those needs, as specified in State law. The housing objectives and policies included in the Fresno Housing Element, as well as the actions (programs) that the City will undertake to meet its housing needs, are discussed in this Chapter. An identification of funding sources, responsible entities, and time frames for implementation are also presented.



*Renaissance at Santa Clara, Single Room Occupancy Housing, completed in 2012*

The Housing Element objectives, policies, and programs aim to:

- Provide adequate sites to meet the 2013-2023 RHNA;
- Assist in the development of housing to meet the needs of lower-income households
- Address and where appropriate, and legally possible, remove governmental constraints to housing development;
- Conserve, preserve, and improve the condition of the existing affordable housing stock; and
- Promote equal housing opportunity.

These objectives are required by and delineated in state law (California Code Section 65583 [b][1]).

## Fresno General Plan Consistency

California Government Code Section 65300 requires that General Plans be internally consistent. The Housing Element, as an element of the Fresno General Plan, is consistent with the goals, objectives and policies of the other elements of the general plan. Key goals, objectives, and policies from the Fresno General Plan Urban Form, Land Use, and Design Element are noted below to illustrate the Housing Element's consistency with the General Plan.

### **Objective UF-1: Emphasize the opportunity for a diversity of districts, neighborhoods and housing types.**

***Policy UF-1-d:*** Range of Housing Types: Provide for diversity and variation of building types, densities, and scales of development in order to reinforce the identity of individual neighborhoods, foster a variety of market-based options for living and working to suit a large range of income levels, and further affordable housing opportunities throughout the city.

***Policy UF-1-e:*** Unique Neighborhoods: Promote and protect unique neighborhoods and mixed use areas throughout Fresno that respect and support various ethnic, cultural and historic enclaves; provide a range of housing options, including furthering affordable housing opportunities; and convey a unique character and lifestyle attractive to Fresnoans. Support unique areas through more specific planning processes that directly engage community members in creative and innovative design efforts.

### **Objective LU-2: Plan for infill development that includes a range of housing types, building forms, and land uses to meet the needs of both current and future residents.**

***Policy LU-2-b:*** Infill Development for Affordable Housing: Establish a priority infill incentive program for residential infill development of existing vacant lots and underutilized sites within the City as a strategy to help to meet the affordable housing needs of the community.

***Policy LU-4-c:*** Housing Task Force. Establish an interagency housing task force to coordinate the housing programs of the City with similar programs of other local jurisdictions and the Fresno Housing Authority to develop a coordinated affordable housing implementation plan.

## Objectives, Policies, and Programs

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### **Objective H-1: Provide adequate sites for housing development to accommodate a range of housing by type, size, location, price, and tenure.**

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- **Policy H-1-a:** Implement land use policies and standards that allow for a range of residential densities and products that will enable households of all types and income levels the opportunity to find suitable ownership or rental housing.
  - **Policy H-1-b:** Encourage development of residential uses in strategic proximity to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes.
  - **Policy H-1-c:** Promote the development of affordable and special needs housing near transit and/or smart growth areas.
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#### **Program 1 – Adequate Sites**

**Adequate Sites to Meet 2013-2023 RHNA:** The City of Fresno has a remaining RHNA of 21,178 units for the 2013-2023 RHNA period, after credits for permitted or approved units are taken into consideration. The residential sites inventory to address the current 2013-2023 RHNA consists of over 4,475 acres of mostly vacant land with capacity to yield at least 34,983 new units.

**Adequate Sites to Meet 2008-2013 RHNA:** The previous Housing Element (2008-2013) committed to an adequate sites rezoning program. The expected capacity of the sites to be rezoned far exceeded the capacity needed to meet the 2008 RHNA. After a comprehensive update to the General Plan (Fresno General Plan, adopted in 2014), the City drafted a new Development Code, Downtown Development Code, and Zoning Map which resulted in significantly increased potential development capacity. Although the City's vacant residential land inventory under the newly adopted Development Codes has a capacity in excess of the 2008 RHNA commitment, the rezoning was completed at the end of previous planning period and thus provided only limited opportunities for development during the planning period. AB 1233 (Government Code Section 65584.09) requires the City to identify and if necessary rezone sites in the first year of the current planning period to address the unaccommodated lower-income RHNA from the previous planning period. This requirement is in addition to the requirement to identify other specific sites to accommodate the RHNA for the current planning period. The City of Fresno must carry over 6,476 lower-income units from the 2008-2013 RHNA. After credits for permitted or approved units are taken into consideration, the City has a remaining unaccommodated lower-income RHNA of 4,873 units. The residential sites inventory to address the unaccommodated 2008-2013 RHNA consists of over 38 acres of vacant and underutilized land with capacity to yield 5,541 new units.

Overall, the City has the ability to adequately accommodate, and significantly exceed, the City's current 2013-2023 RHNA and unaccommodated 2008-2013 RHNA under existing General Plan and Development Code standards. The City will maintain an inventory of available sites for residential development and provide it to prospective residential developers upon request.

The City of Fresno is not responsible for the actual construction of these units. The City is, however, responsible for creating a regulatory environment in which the private market could build these units. This includes the creation, adoption, and implementation of General Plan policies, zoning and development standards, and/or incentives to encourage the construction of various types of units.

*Responsibility:* Development and Resources Management Department  
Planning Division  
*Funding Source:* General Fund  
*Timeframe/Objective:* Ongoing implementation and annual assessment of status of housing sites inventory as part of the annual reporting process

### **Program 2: Residential Densities on Identified Sites**

Government Code §65863 states that no jurisdiction shall reduce, or require, or permit the reduction of, the residential density for any parcel to, or allow development of any parcel at, a lower residential density, or allow development at a lower residential density than projected for sites identified in the Housing Element sites inventory unless the jurisdiction makes written findings that the reduction is consistent with the General Plan, and that the remaining sites identified in the Housing Element are adequate to accommodate the jurisdiction's need.

The Housing Element includes two distinct residential land inventories:

- " 2013-2023 (current Housing Element cycle)
- " 2008-2013 (previous Housing Element cycle rollover)

The inventories are presented in this Element separately to facilitate tracking of sites throughout the planning period and due to the different criteria each inventory must address under housing element law.

The City of Fresno will evaluate residential development proposals for consistency with goals and policies of the General Plan and both (2008-2013 and 2013-2023) Housing Element Sites Inventories, and make written findings that the density reduction is consistent with the General Plan and that the remaining sites identified in the Housing Element are adequate to accommodate the RHNA. So long as the residential sites inventory continues to exceed the City's RHNA as set forth in Program 1, the City shall make the necessary written findings regarding the reduction's consistency with the General Plan. If a proposed reduction of residential density will result in the residential sites inventory failing to accommodate the RHNA, the City shall consider an amendment to the Housing Element in order to restore capacity to the sites inventory, before acting on a density reduction. Sites selected to restore capacity to the inventory shall provide equivalent capacity, be of an equivalent size, and provide appropriate density relative to the site subject to the density reduction in order to qualify as a sufficient replacement site. If a site requires a rezone in order to be counted as a replacement site in the sites inventory, the rezone application shall be processed concurrently with the Housing Element amendment. As part of this process, the City will

encourage and support the expansion of affordable housing opportunities that prevent the concentration of single-family and multifamily dwelling units affordable to low- and moderate-income households and will consider concentration of affordable housing when selecting replacement sites for the inventory.

A Housing Element amendment would only be required in the case that the housing sites inventories were at risk of dropping below the RHNA, and is not required for individual projects that do not match the sites inventory assumptions exactly, as long as the findings indicated in §65863 can be made.

The City will monitor both sites inventories to ensure maintenance of adequate sites and specifically to evaluate whether development on identified sites is occurring as expected related to development types, densities, and quantities. Monitoring of the percentage of affordable units on large sites will be processed pursuant to Program 16.

<i>Responsibility:</i>	Development and Resources Management Department Planning Division
<i>Funding Source:</i>	General Fund
<i>Timeframe/Objective:</i>	Ongoing implementation: as part of the entitlement review process, evaluate new projects for consistency with General Plan objectives as they relate to housing and the RHNA obligations. Establish procedure for the review process by April 2017. If, at any time within the Housing Element planning period, the findings indicated in §65863 cannot be made, the City shall approve a Housing Element amendment to identify adequate sites to meet the RHNA prior to approval of any density reduction. If a rezone is required to restore sites to the inventory, it shall be processed concurrently with a Housing Element amendment. As part of the Annual Review process, monitor and evaluate development on identified sites in both inventories (2008-2013 and 2013-2023). If Development Permit approvals reduce the 2008-2013 sites inventory such that it no longer meets the 2008-2013 RHNA, the City shall approve an amendment to the Housing Element to identify adequate sites to meet the 2008-2013 RHNA prior to approving additional Development Permits.

### **Program 3: Annual Reporting Program**

Achieving consensus on housing policy and proposed housing developments can be a difficult process. Through active and continued dialogue with stakeholders and neighborhood groups, the likelihood of achieving neighborhood consensus for new housing policy and developments is increased significantly. Fresno supports efforts to help residents be more informed about housing facts, which will help them provide sound direction on housing solutions. Fresno has a Housing and Community Development Commission that can help facilitate this annual evaluation. Information

provided would include exploring avenues to help residents understand development tradeoffs, the benefits of affordable housing, and implementation of measures necessary to implement the City's vision for a vibrant and lively community.

**Objectives:** Partner with housing advocates, organizations, and developers to provide annual information to the community on housing density and affordable housing. Actively work toward Housing Element implementation, and reach out to the community regarding these topics annually as part of a Housing Element Annual Report on annual progress. Notify and invite interested community members to attend and discuss housing production progress at a public hearing, and continue to provide avenues for community input on the implementation of the Housing Element. Utilize multiple methods of outreach to engage all members of the Fresno community, including multilingual notices and media outlets. Encourage input on other housing and fair housing-related programs and policies maintained by the City, including but not limited to those contained in the Analysis of Impediments to Fair Housing Choice (or Assessment of Fair Housing) and relevant General Plan policies and Development Code provisions. Allow residents and stakeholders the opportunity to discuss and provide information and feedback to City staff and policy-makers.

*Responsibility:* Development and Resources Management Department, Planning, Housing, and Community Revitalization Divisions

*Funding Source:* General Fund

*Timeframe/Objective:* Partner with housing advocates and organizations to provide information to the community on housing density and affordable housing. Reach out to the community regarding these topics annually as part of a Housing Element Annual Report. Notify and invite interested community members to attend and discuss housing production progress at a public hearing. Facilitate community input on other housing and fair housing-related programs and policies as those opportunities arise.

**Objective H-2: Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.**

- **Policy H-2-a:** Facilitate housing development that is affordable to extremely low-, very low-, low-, and moderate-income households by providing technical assistance, regulatory incentives and concessions, and financial resources as funding permits.
- **Policy H-2-b:** Encourage both the private and public sectors to produce or assist in the production of housing, with particular emphasis on housing affordable to persons with disabilities, elderly, large families, female-headed households with children, and people experiencing homelessness.
- **Policy H-2-c:** Continue to utilize federal and State subsidies to the fullest extent to meet the needs of lower-income residents, including extremely low-income residents.

- **Policy H-2-d:** Support regional efforts to address homelessness, including the Fresno-Madera Continuum of Care.
  - **Policy H-2-e:** Support and coordinate with agencies and service providers offering foreclosure services.
  - **Policy H-2-f:** Promote and encourage sustainable development and green building practices for all new residential development and for the retrofitting of existing housing.
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#### **Program 4 – Density Bonus Programs**

The TOD Height and Density Bonus program provides flexibility for projects that promote walkability, livability, and transit ridership near stations for Bus Rapid Transit and other enhanced transit service. For qualifying project sites, the bonus height may exceed the base district height by 25 percent and the bonus density may exceed that of the base district by 100 percent.

The City will encourage use of the State Affordable Housing Density Bonus and City of Fresno TOD Height and Density Bonus provisions through technical assistance and information dissemination.

*Responsibility:* Development and Resources Management Department  
Planning Division

*Funding Source:* General Fund

*Timeframe/Objective:* Ongoing implementation and annual reporting throughout the planning period.

#### **Program 5 – Housing Funding Sources**

The City will actively pursue funding to assist in the development, preservation, and rehabilitation of any housing type with a particular emphasis on the development of mixed-income neighborhoods. The City will identify these funding opportunities to both for-profit and non-profit developers as part of the residential and mixed-use development processes, especially those projects that have the potential for affordable housing. The City will also continue to assist Low Income Housing Tax Credit (LIHTC) applications and Affordable Housing and Sustainable Communities (AHSC)/Cap and Trade applications. The actions that the City will take specifically include, but are not necessarily limited to:

- Identification of potential funding assistance and support applications for current state and federal assistance
- Identification of sites available for development and infill opportunities
- Pursue funding to assist in the development, preservation, and rehabilitation of housing, with a particular emphasis on the development of mixed-income residential neighborhoods and the expansion of affordable housing opportunities outside of the City's low- and moderate-income areas
- Continued exploration of the development of a Transit Oriented Affordable Housing Loan Fund, which could pool local, state, federal, and private Community Reinvestment Act (CRA) sources to support mixed-income housing



- Continued exploration and potential partnerships with non-profit entities to support the development of a land bank or community land trust to acquire properties for rehabilitation and/or development of affordable and mixed-income housing
- Continued support of State and federal legislation that increases financial support and reduces regulatory barriers for affordable housing
- Assessment and exploration of the potential for new funding programs, such as AB 2 (Alejo, 2015) to create additional local sources of funding for affordable housing
- Consideration of entitlement process(es) incentives as may be necessary and appropriate

*Responsibility:* Development and Resources Management Department Housing and Community Development Division

*Funding Source:* HOME Program, LIHTC, AHSC

*Timeframe/Objective:* Annual assessment of funding opportunities and status of housing sites inventory as part of the annual reporting process; Ongoing implementation and annual reporting throughout the planning period.

### **Program 6 – Strengthening Partnerships with Affordable Housing Developers**

The City will continue to strengthen partnerships and relationships with affordable housing developers, including but not limited to the Fresno Housing Authority, by doing the following:

- Encouraging and assisting in funding applications to applicable federal, State, and local funding sources
- Supporting local capacity building efforts around affordable housing finance, including convening affordable housing developers, community development leaders, lenders, and advocates to identify ongoing regulatory and funding barriers to affordable and mixed-income development
- Attracting large investors to facilitate the construction of new affordable housing units and incentivize self-help type single-family housing construction for extremely low-income households
- Reviewing published notices for funding availability and causing applications to be prepared for various City housing programs, projects, and activities
- Administering Community Housing Development Organization (CHDO) funds for affordable housing projects with service providers including Habitat for Humanity
- Encouraging non-profit organizations to seek funding for development of new farmworker housing projects, as well as local affordable housing and mixed-

income projects in transit-oriented developments along transit corridors throughout the City

*Responsibility:* Development and Resources Management Department  
Planning, Housing, and Community Revitalization Divisions

*Funding Source:* HOME & CDBG Programs

*Timeframe/Objective:* Ongoing implementation and annual reporting throughout the planning period; annual review and assessment of potential funding opportunities; convene annual meeting, starting in the Fall of 2016, with housing stakeholders to identify development barriers, funding opportunities, and opportunities for development of affordable and special needs housing; and administer Community Housing Development Organization (CHDO) funds as part of the Consolidated Plan process and annual Action Plan update.

### **Program 7 – Special Needs Housing**

The City will continue to encourage the development of adequate housing to meet the needs of persons with special needs (such as seniors, survivors of domestic violence, and people with disabilities, including persons with developmental disabilities), including the following efforts:

- The City will continue implementation of its Universal Design Ordinance for new construction or modification of City-subsidized housing using visitability and aging in place as guiding principles. The program includes:
  - One ~~no~~ step+entry
  - Accessible interior routes
  - Accessible kitchen counter space
  - Ground-floor facilities for units over 750 square feet in size
- The City will partner with and encourage local and State non-profits to seek funding for development of new farmworker housing projects.
- The City will use funding programs such as the Emergency Shelter Grant (ESG) and Housing Opportunities for Persons with HIV/AIDS (HOPWA) to support needed social services and review applications annually.
- The City will continue to utilize available funds and/or seek funding to support the Fresno-Madera Continuum of Care, a local collaborative of homeless service providers, to construct transitional and supportive housing units.
- The City will provide technical assistance to developers with proposed Single Room Occupancy (SRO) projects to create units during the plan period.

- The City and Housing Authority of the City of Fresno will investigate funding sources, develop partnerships, and apply for available local, State, and federal funds to assist in the production of large family units.
- The City and Housing Authority of the City of Fresno will seek and apply to funding sources and partner with local and statewide non-profits and for-profits in applying for funds and encouraging the construction of units for extremely low-, very low-, and low-income income seniors (typically age 65 years and over; may vary by funding source or program).

*Responsibility:* Development and Resources Management Department Housing and Community Development Division

*Funding Source:* HUD Funds (ESG), Other Grants

*Timeframe/Objective:* Annual implementation as part of the HUD Entitlement Grant and Continuum of Care funding process; 500 households assisted with temporary shelter during the planning period (62.5 households per year).

### **Program 8 – Home Buyer Assistance**

The City of Fresno administers a first-time homebuyer program that provides up to \$50,000 as a silent second loan to an eligible homebuyer. The program helps low-income households purchase their first home in qualified census tracts in Fresno (excluding County islands) and is funded by the California Department of Housing and Community Development's CalHome program.

The City also converts new single-family housing development loans to first-time homebuyer assistance loans upon transfer of the property to the homebuyer. The City will continue to pursue funds for the first-time homebuyer program to assist City households during the planning period. The City will also conduct targeted marketing to real estate professionals, lenders and eligible homebuyers as part of the program and will include high opportunity areas in the marketing plan.

*Responsibility:* Development and Resources Management Department Housing Division

*Funding Source:* CalHome

*Timeframe/Objective:* Contingent on state funding availability, assist 10 households annually and complete annual reporting throughout the planning period. Develop and implement a marketing program to target the resources to eligible homebuyers within 4 months of receipt of Calhome Program funds from HCD. Marketing shall occur on an ongoing basis, and at least annually from receipt of funds.

### **Program 9 – Homeless Assistance**

The City of Fresno works in collaboration with service agencies dedicated to providing shelter, housing, and case management services to those in need. While the City does not provide direct services, street outreach, or case management services, it has

established a strong partnership with local, State, and federal agencies that continue to grow. Through this collaboration, service agencies have embraced the national best practice model of housing first, and have prioritized ending veteran and chronic homelessness.

In February, 2015 the Multi-agency Access Program (MAP) Point at the Poverello House was opened and continues to operate as an integrated intake process connecting individuals facing housing, substance abuse, and/or medical illness challenges to supportive services. During the 2015 Point-In-Time Count, service agencies documented an overall 40 percent decrease in the homeless population. Results from the 2016 Point-In-Time Count are expected in June, 2016.

The City utilizes entitlement funding from the U.S. Department of Housing and Urban Development (HUD) to implement programs related to homelessness. The City will apply for, or support applications for funding for emergency shelters, transitional or supportive housing. The City will continue to use Emergency Solutions Grant (ESG) Program funds to support needed social services and review applications annually. The City is also utilizing the HOME Investment Partnerships (HOME) Program and is contracted with the Fresno Housing Authority to implement a \$1 million tenant-based rental assistance program for persons that are homeless, threatened with homelessness, or in need of housing assistance after completing a transitional living program. In addition to ESG and HOME funds, during fiscal year 2016, the City allocated approximately \$520,000 in general funds for the MAP Point at the Poverello House, outreach, and assessment of homeless individuals.

The City will continue to participate in and support the Fresno Madera Continuum of Care and the MAP Point at the Poverello House.

<i>Responsibility:</i>	Development and Resources Management Department Housing and Community Development Division
<i>Funding Source:</i>	HUD Funds (ESG)
<i>Timeframe/Objective:</i>	Annual implementation as part of the Emergency Shelter Grant and Continuum of Care funding process and complete annual reporting for HUD entitlement funds throughout the planning period; assist 100 households

### **Program 10A – Mobile Home Parks**

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

- Compile a list of resources and provide technical assistance to facilitate the maintenance and preservation of mobile home parks.
- Conduct yearly outreach to mobile home residents and park owners regarding potential funding sources, including the State's Mobilehome Park Rehabilitation and Ownership Program. Outreach may be facilitated by going to mobile home clubhouses and posting information in readily visible locations. Conduct and publish an assessment of housing-related needs in mobile home parks through communications with residents and owners, identifying city, state, federal, and private resources available to address those needs.
- Provide assistance with funding applications to mobile home park owners, residents, and non-profit organizations to assist in mobile home park preservation.
- Compile a list and map of mobile home parks in Fresno. Develop a list of mobile-home preservation experts and nonprofit organizations that can assist in the preservation of mobile home units. Provide this information to interested mobile home park residents, owners, and non-profit organizations.

*Responsibility:* Development and Resources Management Department - Planning, Housing, and Community Revitalization Divisions

*Funding Source:* General Fund

*Timeframe/Objective:* Compile a list of financial resources for residents and park owners for maintenance and preservation, and outreach to stakeholders by January 2017. Compile a list of mobile home parks (not individual units), mobile home preservation experts, and non-profits by the end of 2017. Conduct annual outreach to park owners and non-profit organizations interested in preservation of mobile home units, starting in January, 2018.

### **Program 10B – Housing Choice Vouchers**

The Housing Choice Voucher (HCV) program, formerly the Section 8 program, provides rent subsidies to very low-income households which overpay for housing. Prospective renters secure housing from HUD-registered apartments that accept the certificates. HUD then pays the landlords the difference between what the tenant can afford (30 percent of their income) and the payment standard negotiated for the community. In Fresno, the Fresno Housing Authority administers the HCV program. To facilitate access to the Housing Authority's program, the City will collaborate with and support the Housing Authority's program on an annual and ongoing basis by:

- Providing information about Housing Choice Vouchers at the planning counter, on the City/ website and in other public places to increase awareness.
- Assisting the Housing Authority in maintaining a list of multifamily rental developments that accept vouchers and hold regular discussions with potential new landlords to expand the number of developments that accept HCV tenants.

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

*Responsibility:* Development and Resources Management Department .  
Planning, Housing, and Community Revitalization Divisions;  
Fresno Housing Authority

*Funding Source:* HUD funding

*Timeframe/Objective:* Ongoing implementation and annual reporting throughout the planning period; Provide information on the Housing Choice Voucher program and list of developments that accept vouchers at City counters and website by November 2017; Identify properties in high opportunity areas for outreach efforts by June, 2017 and support the Housing Authority's outreach to those areas on an annual and ongoing basis.

### **Program 11 – Fresno Green**

The City has been active in taking steps to invest and deploy renewable energy technology and improve the energy efficiency of City-owned facilities and the community at large. The Fresno Green strategy was created in April 2007 as the City's action plan for achieving sustainability by 2025. The Fresno Green program is committed to the construction of buildings and communities that are sustainable and environmentally responsible. Incentives for certified Fresno Green development projects include:

- 25 percent fee reductions of many planning fees (Site Plans, CUPs, EAs etc.)
- 20 percent minor deviation from development standards, if needed (25 percent if public art is incorporated into the project)
- Eligibility for a Fresno Green award and use of the Fresno Green brand for the project

The City will continue implementation of the Fresno Green program and work with developers to lower long-term housing costs through energy-efficient housing developments. The City will also monitor grant funds for applicable housing related energy-efficient items and pursue funding on an ongoing basis.

*Responsibility:* Development and Resources Management Department  
Planning Division

*Funding Source:* General Fund

*Timeframe/Objective:* Ongoing implementation of the Fresno Green program and annual reporting throughout the planning period

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**Objective H-3 Address, and where possible, remove any potential governmental constraints to housing production and affordability.**

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- **Policy H-3-a:** Review and adjust as appropriate residential development standards, regulations, ordinances, departmental processing procedures, and residential fees related to rehabilitation and construction that are determined to be a constraint on the development of housing.
  - **Policy H-3-b:** Educate applicants on how to navigate the development approval process and otherwise facilitate building permit and development plan processing for residential construction.
  - **Policy H-3-c:** Facilitate timely development plan and building permit processing for residential construction.
  - **Policy H-3-d:** Provide incentives and regulatory concessions for residential projects constructed specifically for lower- and moderate-income households.
  - **Policy H-3-e:** Encourage the new construction of housing in the Central City, Inner City, and other targeted areas.
  - **Policy H-2-f:** Prioritize infrastructure improvements, code enforcement, and public services provision in high-need areas.
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**Program 12 – Downtown Development**

In 2016, the City adopted the Downtown Development Code (DDC) to encourage infill development at the City's core that is compact and walkable, offers a mix of uses, and creates a sense of place. The Downtown zoning standards contain a residential capacity limit for the Downtown Planning Area (9,990 dwelling units), with unlimited density on individual Downtown properties. Residential capacity in the area is significantly increased with the DDC and allows residential development where it was not previously permitted. The Downtown standards provide a streamlined and clear set of zoning regulations, making good projects easier to build in Downtown and the surrounding neighborhoods. To facilitate higher-density mixed-use development in Downtown, an environmental impact report assessed the proposed Downtown plans and code so that new development that complies with Code will not be subject to further environmental analysis.

The City will ensure that the Downtown Development Code standards will not constrain the potential for developing housing and that zoning standards for the sites ensure continued adequate capacity to meet the City's RHNA obligation.

*Responsibility:* Development and Resources Management Department  
Planning Division

*Funding Source:* General Fund

*Timeframe/Objective:* Annually assess residential development activity in Downtown Fresno as part of the annual reporting process, starting in 2017. Initiate adjustments to the DDC if constraints to the production of housing are identified.

### **Program 12-A – Downtown Displacement Prevention**

The City will implement Policy 7.12.1 of the Downtown Neighborhoods Community Plan which calls for the convening of a displacement task force to explore ways to provide opportunities for low income residents and merchants to remain in their neighborhoods if displacement is observed due to substantial and sustained increases in rent. The task force should work in conjunction with low income residents, community organizations serving low income residents, experts on displacement, low income business owners, and property owners in the plan area.

The intent of the displacement task force is to establish measurements and collect data on those measurements that can identify gentrification and/or displacement of residents or businesses in Downtown. The data gathering measures are intended to establish baseline conditions which will be used to compare to future conditions as the Downtown area redevelops. The following action items are included in the Plan:

- Convening a displacement task force to explore ways to provide opportunities for low-income residents and merchants to remain in their neighborhoods if displacement is observed. The Task Force shall be convened in 2018, within 3 months of the release of the first annual report on displacement.
- Annually gathering data on lease rates, vacancy rates, rent burden, rental rates, restricted affordable housing covenant expirations, and, if applicable, direct displacement for use by the task force. An annual report on data gathered shall be released for public review and input.
- Identifying a set of actions that give displaced persons or businesses the opportunity to remain in the area if they wish to do so within 6 months of the Task Force finding that displacement is occurring, which will be carried out within one year of identifying the actions.
- Seeking funding for mixed income and affordable housing within the plan area, including potential set-asides for affordable housing for tax increment generated within any future Enhanced Infrastructure Financing Districts formed or a future citywide affordable housing trust fund.
- Working with the owners of affordable housing properties to ensure that affordability is maintained over the long term.
- Creating and maintaining a webpage to post information provided by staff to the task force, task force minutes, reports issued by the task force, and other relevant materials.

*Responsibility:* Development and Resources Management Department  
Planning Division

*Funding Source:* General Fund

*Timeframe/Objective:* Annually gather data on lease rates, vacancy rates, rent burden, rental rates, restricted affordable housing covenant expirations, and if applicable, displacement as part of the annual reporting process, starting in 2018. Convene Task Force within 3 months of release of first annual report on displacement in 2018. If



displacement is observed, within 6 months identify a set of actions that give displaced persons or businesses the opportunity to remain in the area if desired.

### **Program 13 – City of Fresno’s Home Energy Tune-Up (HETU) Program**

The City of Fresno provides the Home Energy Tune-Up (HETU) Program to residents of Fresno and seven other counties from Bakersfield to Stockton California in the PG&E electric service territory. This program is funded by California utility customers and administered by PG&E under the auspices of the California Public Utilities Commission. For most people, especially lower-income residents, the energy bill is the second largest housing expense, second only to rent or the mortgage payment. By leveraging the no-cost HETU program, Fresno’s residents are provided with the knowledge and resources to lower their energy costs and create better homes in the process. The HETU program provides a range of services that includes:

- Simple online Home Energy Profile (HEP) smart-meter analytics tool that uses advanced analytics to monitor a residence’s home’s energy use and offers specific tips to help clients save money on their energy bill and make their homes more comfortable
- In-Home energy efficiency auditing service that provides Fresno residents with:
  - Straight forward understanding of their home’s current energy use
  - Energy conservation measure recommendations and their associated energy and utility savings
  - Online resources to research and locate qualified subcontractors
  - Information on current utility rebate and incentives to assist with buying down energy retrofit projects
  - Summary of available financing programs
- Follow-up support services to assist homeowners with understanding and leveraging all aspects of the HETU program

The City managed the HETU program since 2011 and is committed to continuing to provide local residents with this vital service to help drive down energy costs, improve indoor air quality, and make homes more comfortable for Fresno residents.

*Responsibility:* Development and Resources Management Department  
Sustainable Fresno Division

*Funding Source:* PG&E

*Timeframe/Objective:* Ongoing implementation and annual reporting throughout the planning period. Estimated 1,100 households served per year.

### **Program 14 – Expedited Processing/Business Friendly Fresno**

The City’s Business Friendly Fresno program presents prospective developers with an easy-to-follow and customer-focused approval process. The program has established accountability and clear protocols and authority for decision-making that align with the General Plan and the Development Code. The City will continue to implement the Business Friendly Fresno program as it applies to residential development projects and

also continue to provide fast track or one-stop permit processing for housing developments affordable to lower-income households or other priority housing needs (i.e., extremely low-income, large families, persons with disabilities, farmworkers). As needed, the City will assess the incentives needed to facilitate the development of affordable housing.

*Responsibility:* Development and Resources Management Department  
Planning Division

*Funding Source:* General Fund

*Timeframe/Objective:* Ongoing implementation and annual reporting throughout the planning period; Review development incentives every two years and modify or add development incentives that will facilitate the development of affordable housing.

### **Program 15 – Development Incentives**

The City will continue to provide priority processing for the construction of new housing in the Downtown Planning Area by processing completed plans, consistent rezoning, and Development Permit review and Conditional Use Permit applications for permitting within an average of 75 working days. The City will continue to provide reduced application fees and priority processing for single-family and multi-family projects within the Inner City Fee Program area, as referenced in the Municipal Code, to create housing units. In addition, impact fee waivers are available for qualifying infill projects in priority areas of the City pursuant to Ordinances 2013-21 (The Build Act), and Fresno Municipal Code Article 4.14 (Fee Waivers for Certain Projects in Economically Disadvantaged Areas). As funding is available, the City will reduce or subsidize development and impact fees for affordable housing.

*Responsibility:* Development and Resources Management Department  
Planning Division

*Funding Source:* General Fund

*Timeframe/Objective:* Assist 2 housing developments annually and complete annual reporting throughout the planning period.

### **Program 16 – Large and Small Lot Development**

The Housing Element sites inventory is divided into two components: sites to meet the 2013-2023 RHNA and sites to meet the 2008-2013 RHNA. In the sites inventory to meet the unaccommodated 2008 RHNA, only seven out of 87 parcels (not including Cap and Trade sites and potential infill projects) have a residential capacity under 16 units. Those seven parcels were included in the inventory because they were located adjacent to other parcels and make up larger consolidated sites. Stand-alone parcels that had a capacity lower than 16 units were not included in the 2008 land inventory. In the sites inventory to meet the 2013-2023 RHNA, only four percent of lower-income/higher-density capacity is located on sites with capacity for fewer than 16 units.

Small sites present the opportunity for development on existing sites or lot consolidation into larger projects. There are many opportunities for lot consolidation surrounding

identified sites, given the underutilized nature of surrounding properties. The Voluntary Parcel Merger program permits the combining of parcels without going through the Parcel Map or Lot Line Adjustment process. In addition, to facilitate lot consolidation, the City has reduced the application fee from \$5,360 to \$627. The program went into effect July 1, 2016.

The Sites Inventory includes 2,644 acres of vacant and underutilized sites that are over 10 acres in size (53.8 percent of all residential capacity on vacant and underutilized sites). To encourage a strategic approach to the development of large sites and to facilitate the development of housing, the City will encourage the development of large sites through an allowance of phasing of development and off-site improvements and, where applicable, through the Specific Plan process.

The City will assist interested developers/property owners in identifying opportunities for lot consolidation or lot splitting. The City will continue to streamline the processing of requests for lot consolidation and lot splitting concurrent with other development reviews. The City will also facilitate splitting of large lots to promote the efficient use of land for residential development in compliance with the Subdivision Map Act, when an applicant submits an application. Currently, the City utilizes tools such as ministerial processing and other streamlining tools, as appropriate, to facilitate lot merging and parcelization.

The City will also establish a program to monitor development trends on small and large lots, identify regulatory barriers, and adjust incentives and/or development standards accordingly. The monitoring program will include a threshold defining small and large lots and may vary by neighborhood, community plan area, or zoning district. The monitoring program will include a biennial review of development on large and small lots, and will seek input from developers and property owners on regulatory barriers to development of these lots. The monitoring program will further track the percentage of affordable units developed on large lots on an annual basis and after the first year of monitoring, will identify a minimum threshold of affordable units for the total number of large lots. Monitoring will begin upon receipt of the first application for development on a large lot included within the sites inventory. If the total number of affordable units being developed on large lots does not reach the identified minimum threshold beginning in the second year of monitoring, then the City may develop and apply incentives in order to encourage development of affordable units. If development on large lots will lead to the need for an amendment to the sites inventory, such analysis will consider any necessary rezoning consistent with Program 2.

<i>Responsibility:</i>	Development and Resources Management Department Planning Division
<i>Funding Source:</i>	General Fund
<i>Timeframe/Objective:</i>	Implement the Voluntary Parcel Merger Program and fee reduction program by mid-2016. Establish a policy and guidelines for the requirements of a Specific Plan or phasing process for large site development by December 2017.

Establish a monitoring program by June, 2017 and include a biennial review process for development (or lack thereof) on large and small lots, include an annual review process for monitoring the percentage of affordable units developed on large lots, and create an incentive program for affordable units on those sites after the first year of monitoring.

#### **Program 16A: State Laws Related to Housing Development**

As part of an ongoing effort to ensure compliance with emerging state laws, the City will identify appropriate revisions to the City's Development Code and present them for consideration consistent with FMC procedures. As part of this effort, the City will work to increase awareness of standards that allow second dwelling units, backyard cottages, tiny houses and accessory living quarters by providing written information at the City's planning counter and on the City's website.

*Responsibility:* Development and Resources Management Department  
Planning Division

*Funding Source:* General Fund

*Timeframe/Objective:* Review Development Code for compliance with State laws by May, 2017. If needed, present findings to the City Council for consideration of any amendments or revisions required by September 2017. Provide written information on the City's development standards related to second dwelling units at the City's Planning and Land Use Division counter and on the City's website by January 2018.

#### **Program 17 – Agricultural Employees (Farmworker) Housing**

The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units as an agricultural use and permitted where agricultural uses are permitted.

The City of Fresno Development Code allows agricultural labor housing by right in the Buffer (B) district and specifically indicates that in the case of any conflict the California Health and Safety Code relating to agricultural employee housing, State law supersedes the Development Code. The City will review the Fresno Development Code to ensure continued compliance with the California Employee Housing Act. Based on the review of the Development Code, the City will amend or revise the Fresno Development Code, if needed, to comply with the Employee Housing Act.

*Responsibility:* Development and Resources Management Department  
Planning Division

*Funding Source:* General Fund

*Timeframe/Objective:* Review Development Code for compliance with the Employee Housing Act by January, 2017. If needed, present to the City

Council for consideration of any amendments or revisions required by July, 2017.

**Program 18 – Infrastructure Priority Program**

The Department of Public Utilities has established written policies and procedures that ensure water and sewer services are to be provided as a priority for developments that include units affordable to lower-income households, contingent on the development application's compliance with all entitlement requirements. The City will ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application's compliance with all entitlement requirements.

*Responsibility:* Department of Public Utilities, Development and Resources Management Department Planning Division

*Funding Source:* General Fund

*Timeframe/Objective:* Ongoing implementation and annual reporting throughout the planning period

**Program 19 – Water and Sewer Service Providers**

The City of Fresno Department of Public Utilities (DPU) provides potable water to the majority of the City, and the City is the Regional Sewer Agency for the Fresno-Clovis Metropolitan Area. In accordance with Government Code Section 65589.7, immediately following City Council adoption, the City must deliver to all public agencies or private entities that provide water or sewer services to properties within the City of Fresno a copy of the 2015-2023 Housing Element.

*Responsibility:* Development and Resources Management Department Housing and Community Development Division

*Funding Source:* General Fund

*Timeframe/Objective:* Provide Housing Element within 30 days of adoption.

**Objective H-4: Conserve and improve the condition of Fresno's existing housing stock.**

- **Policy H-4-a:** Enforce adopted code requirements that set forth acceptable health and safety standards for the occupancy of existing housing.
- **Policy H-4-b:** Advocate and facilitate the conservation and rehabilitation of substandard residential properties by homeowners and landlords.
- **Policy H-4-c:** Utilize Code Compliance resources to bring substandard units into compliance with City codes and to improve overall housing conditions in Fresno.
- **Policy H-4-d:** Educate the public regarding the need for property maintenance and rehabilitation, code enforcement, crime watch, neighborhood conservation and beautification, and other related issues.
- **Policy H-4-e:** Continue to facilitate access to rehabilitation programs that provide financial and technical assistance to low- and moderate-income households for the repair and rehabilitation of existing housing with substandard conditions.

- **Policy H-4-f:** Facilitate the removal of existing housing· including illegal, nonconforming, and blighted properties· that poses serious health and safety hazards to residents and adjacent structures.
  - **Policy H-4-g:** Assist in the preservation of all units at risk of converting from affordable housing to market rate housing.
- 

### **Program 20 – Comprehensive Code Enforcement**

The City of Fresno, in conjunction with private businesses and developers and community-based non-profit organizations, will continue to collectively increase neighborhood revitalization activities. The Community Revitalization Division will continue to assertively conduct targeted neighborhood inspections of housing units for potential health and safety issues. The Community Revitalization Division, Safe Housing and Vacant Structure Team, and all Area Teams as needed, will continue to improve neighborhoods throughout Fresno and increase livability by creating safe and healthy conditions, removing blight, educating citizens, promoting pride of ownership and building collaborative relationships with the community.

In 2016, the City established a Neighborhood Revitalization Team (NRT) that is assigned to targeted neighborhood revitalization activities. The City adopted and implemented a revised blighted vacant building ordinance and has established the Strike Team on Problem Properties. The Mayor-Council Code Enforcement Task Force is currently discussing options to improve property conditions and preserve the city's existing rental housing stock. The City will pursue resolution of cases identified through the inspection process, including through enforcement actions against landlords if necessary.

<i>Responsibility:</i>	Development and Resources Management Department Community Revitalization Division (Formerly Code Enforcement)
<i>Funding Source:</i>	General Fund
<i>Timeframe/Objective:</i>	Complete 8,000 inspections annually, pursue resolution of cases identified through the inspection process, and develop Task Force recommendations by mid-2017. This includes consideration of a residential rental inspection program to proactively ensure rental housing units in the City of Fresno meet minimum health and safety standards and are safe to occupy.

### **Program 21 – Neighborhood Infrastructure**

The Public Works Department will commit its best efforts to provide households, within budgetary allocations, with neighborhood infrastructure improvements such as curbs, gutters, sidewalks, streets, curb ramps, driveway approaches, curb cuts, and street lights. In addition, the City will provide services to facilitate development of undeveloped or underdeveloped properties. The City, through the Disability Advisory Commission and the ADA Transition Plan for the Public Right of Way, will continue to receive citizen

suggestions on needed ADA improvements and implement the most needed projects on a priority basis.

*Responsibility:* Public Works Department  
*Funding Source:* Capital Improvement Funds, HUD Funds (CDBG)  
*Timeframe/Objective:* Complete five infrastructure projects annually, ongoing implementation and annual reporting throughout the planning period.

### **Program 22 – Housing Rehabilitation**

The City offers programs that provide paint and minor repair to seniors, distressed property grant, and home rehabilitation funds for lower-income households. These activities have been funded primarily with HOME and CDBG program funds. The Homeowner Rehabilitation Program provides a grant to low-income, owner-occupied households to make needed repairs and improvements to their homes. The maximum allowable amount for a rehabilitation grant is \$65,000. The City also offers a Senior Paint Program in the form of a grant to low-income senior citizens (62 years of age or older) who own and occupy their home. Grant funds provide for a licensed lead-certified painting contractor to paint the exterior of the home. The Distressed Property Grant provides up to \$15,000 per property to assist low-income homeowners with correction of code violations.

*Responsibility:* Development and Resources Management Department Housing and Community Development Division  
*Funding Source:* HUD Funds (HOME and CDBG program funds)  
*Timeframe/Objective:* Complete 10 rehabilitation grants, 10 senior paint/minor repair grants, and 3 distressed property grants annually.

### **Program 23 – Franchise Tax Board Building Code Program**

The Franchise Tax Board (FTB) operates the Substandard Housing Program, which assists State and local agencies responsible for abating unsafe living conditions that violate health and safety codes. Property owners in violation of health and safety code standards are not allowed to make certain deductions on their personal tax returns pursuant to California Revenue & Taxation Code (CR&TC) Sections 17274 and 24436.5. The additional revenue collected by FTB is transferred to the Local Code Enforcement Rehabilitation fund. These funds are allocated and disbursed to the cities and counties which generated the notification of substandard housing to the FTB.

The City will investigate participation in this program as a tool to reduce the number of substandard units in Fresno.

*Responsibility:* Development and Resources Management Department Community Revitalization Division (Code Enforcement)  
*Funding Source:* General Fund  
*Timeframe/Objective:* Investigate participation by January 2017.

### **Program 24 – At-Risk Housing**

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

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

*Responsibility:* Development and Resources Management Department Housing and Community Development Division

*Funding Source:* HOME Program funds, LIHTC, Cap & Trade, other available funding sources

*Timeframe/Objective:* The City will monitor, every six months, the status of any HUD receipt/approval of Notices of Intent and Plans of Action filed by property owners to convert to market-rate units. The City will annually explore funding sources available to purchase affordability covenants on at-risk projects, transfer ownership of at-risk projects to public or non-profit agencies, purchase existing buildings to replace at-risk units, or construct replacement units. Annually contact property owners to gauge



interest in continuing project affordability and pursue funding and preservation strategy on a project basis. Upon receipt of opt-out notices, the City will work with tenants of at-risk units and provide them with education regarding tenant rights and conversion procedures.

### **Program 25 – Enhanced Police Service to High Crime Neighborhoods**

The Police Department shall continue to focus on strategies to reduce Part I crimes, which are measured by the Federal Bureau of Investigation to assist cities in comparing themselves against other cities in the following categories: murder, rape, robbery, aggravated assault, arson, burglary, theft and auto theft. The Department shall also continue to utilize the Violent Crime Impact Team (VCIT), Multi-Agency Gang Enforcement Consortium (MAGEC), Street Violence Section (SVS), and Patrol Division in reaching this goal. In addition, the Department shall continue its prevention and intervention programs such as the Police Activities League, Citizens on Patrol (COP), and Mayor's Gang Prevention Initiative in an effort to reduce crime in high-crime neighborhoods.

In 2015, the City of Fresno was awarded \$1,875,000 in grant funding through the Department of Justice's Office of Community Oriented Policing Services (COPS Office) COPS Hiring Program (CHP). The money will be used to hire neighborhood police officers and school resource officers for the City of Fresno.

*Responsibility:* City of Fresno Police Department  
*Funding Source:* Fresno Police Department  
*Timeframe/Objective:* Reduce crime in high-crime neighborhoods and explore funding for safety programs on an ongoing basis.

**Objective H-5: Continue to promote equal housing opportunity in the City's housing market regardless of age, disability/medical condition, race, sex, marital status, ethnic background, source of income, and other factors.**

- **Policy H-5-a:** Prohibit discrimination in the sale, rental, or financing of housing based on race, color, ancestry, religion, national origin, sex, sexual orientation, gender identity, age, disability/medical condition, familial status, marital status, source of income, or any other arbitrary factor.
- **Policy H-5-b:** Assist in the enforcement of fair housing laws by providing support to organizations that can receive and investigate fair housing allegations, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.
- **Policy H-5-c:** Provide equal access to housing for special needs residents such as people experiencing homelessness, elderly individuals, and persons with disabilities.
- **Policy H-5-d:** Promote the provisions of disabled-accessible units and housing for persons with mental and physical disabilities.

- **Policy H-5-e:** Ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development applications compliance with all entitlement requirements.
  - **Policy H-5-f:** Accommodate persons with disabilities who seek reasonable waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Development Code.
  - **Policy H-5-g:** Create equitable and affordable housing options throughout the City that provide incentives to residents for finding housing in high opportunity areas and to developers for building affordable housing in high opportunity areas.
  - **Policy H-5-h:** Consult with a wide range of groups throughout the community and consider environmental justice issues in the development and update of regulations, guidelines and other local programs.
  - **Policy H-5-i:** Increase or maintain resources to establish and support outreach, public education and community development activities through community-based and neighborhood organizations.
- 

### **Program 26 – Fair Housing Services**

The City will continue to contract with a fair housing service provider (Fair Housing Council of Central California [FHCCC]) to support enforcement of State and federal Fair Housing Laws and provide fair housing services that include, but are not limited to, the following fair housing service:

- Referring inquiries and landlord/tenant complaints concerning housing discrimination to the applicable regulatory body (State Department of Fair Employment and Housing, HUD, or private counsel) for processing
- Disseminating fair housing information citywide by sponsoring workshops, housing information fairs, monitoring of affirmative marketing and working closely with the State Department of Fair Employment and Housing
- Advertising fair housing laws and complaint procedures through literature displays at City and County offices, non-profit organizations such as Central California Legal Services, Lao Family Organization, Fresno Interdenominational Refugee Ministries, Central Valley Regional Center, property management organizations, lenders, and other such organizations. Literature will be provided in English, Spanish, Hmong, Cambodian, Vietnamese and Lao.
- Disseminating fair housing information through radio, television and other media

<i>Responsibility:</i>	City of Fresno and Fair Housing Council of Central California
<i>Funding Source:</i>	CDBG
<i>Timeframe/Objective:</i>	Provide funding, as available, of \$25,000 per year to the FHCCC and provide services to 2,500 persons annually consistent with the 2015-2019 Consolidated Plan and Action Plans. Update the City of Fresno Analysis of Impediments to Fair Housing Choice by 2017. Complete ongoing implementation and annual reporting throughout the planning period.

### **Program 27 – Equitable Communities**

The City has initiated efforts to improve property values, living conditions, public safety, and the overall quality of life in older neighborhoods through the Fresno General Plan. The General Plan identifies Priority Areas for Development Incentives in Chapter 12 (Implementation), Figure IM-1. This figure identifies areas that have been designated as a priority for investment through policies established within the Plan. It includes the Downtown Neighborhoods Community Plan Area, Phase 1 and Phase 2 Bus Rapid Transit (BRT) and High-Frequency Transit Corridors, Infill Opportunity Zones (IOZs) which have been defined as established neighborhoods generally south of Herndon Avenue and the South Industrial Area. While specific investments were not identified in the General Plan, the City has focused internally on ensuring that future discretionary and formula dollars, especially related to housing, community development, streets, transit, and parks, align with these priority areas. To supplement this effort and focus on the equitable distribution of housing resource and public investment, the City will:

- Publish a General Plan Annual Report every December which will detail the location of public investments as they relate to Figure IM-1 and Figure IM-2 in the Plan, in addition to the location of building permit activity by sector as a metric of private investment. This report would be for use by the public and by the Implementation Committee described below as a basis for making recommendations on General Plan implementation.
- Establish a General Plan Implementation Committee with cross-sector involvement from the private sector, including developers and community organizations, as well as other relevant public institutions, to review progress on the priorities established in the General Plan to invest in older and disadvantaged neighborhoods and continue to refine and review City policy and practice to ensure investments and policies are furthering the goals of the Plan. This committee will convene in early 2017 and have opportunities to provide annual recommendations to the City on prioritization of future investments.
- Continue implementing the written policies and procedures that the City of Fresno Department of Public Utilities has established that ensure water and sewer services are to be provided as a priority for developments that include units affordable to lower-income households.
- Track infrastructure projects in the City to assess the distribution of projects in the different areas of the City. Seek out funding to address infrastructure and public service deficiencies in high-need areas. As funding sources allow, prioritize basic infrastructure improvements including water, sewer, and street lights in high-need communities.
- As recommended by the Mayor/City Council Task Force, consider a residential rental inspection program to proactively ensure rental housing units in the City of Fresno meet minimum health and safety standards and are safe to occupy.

- Assess the interaction between transportation network pathways and affordable housing sites to identify any barriers to affordable housing and employment access by July 2018. An action plan with specific timelines to address identified barriers will be developed within one year of completing the assessment.
- Continue to actively seek resources for disadvantaged communities throughout the City, including sources such as Affordable Housing and Sustainable Communities, Urban Greening, Housing Related Parks, Active Transportation Program, Transit and Intercity Rail Capital Program, Fresno COG Active Transportation and TOD Funds, EPA Brownfields Planning and Cleanup Programs, Highway Safety Improvement Program, and other funds. The City will actively seek resources annually and on an ongoing basis. Wherever possible, the City will partner with local community-based organizations and local affordable housing developers to build additional local capacity to seek funding and implement programs. As part of the partnership with community-based organizations, the City will explore zoning opportunities with respect to a variety of housing types, such as multi-family housing, in several areas within the City, including high opportunity areas. Beginning in 2019 and every two years thereafter, the City will present rezoning options for vacant land in high opportunity areas for Council consideration in order to provide opportunities for higher density development in all areas of the City. Rezoning option presentations shall include at least five sites, between one and ten acres in size. The City will identify and pursue opportunities to promote the development of affordable and mixed-income housing on rezoned sites through outreach to affordable housing developers and supporting the attainment of financing, such as CDBG, HOME Funds, tax credits, and state AHSC funds. These rezoning option presentations are not part of a program described by Government Code Section 65583(c)(1)(A). Finally, specific planning efforts should emphasize incentivizing multi-family housing in high opportunity areas.
- Expand affordable housing opportunities that prevent the concentration of single-family and multifamily dwelling units affordable to low- and moderate-income households. This includes, but is not limited to Development and Resource Management Department facilitation and streamlining of owner-initiated zoning and General Plan land use amendments that expand affordable housing opportunities outside of low- and moderate-income areas for Council consideration, consistent with FMC procedures. It also includes the City's monitoring program (Program 2) to ensure maintenance of adequate housing sites with capacity to accommodate lower income housing, and the inclusion of affordable housing options in the zoning code, such as tiny houses, which are currently allowed as accessory buildings.
- Work with the Fresno Housing Authority to assist households in using vouchers to rent in higher-opportunity areas and to identify landlords who are willing to accept vouchers in communities where vouchers are infrequently used. Develop a recommendation of best practices to target areas for voucher education, such

as areas with high-performing schools or areas with high Area Median Income, as well as areas near jobs and transit.

<i>Responsibility:</i>	Development and Resources Management Department Planning, Housing, and Community Revitalization Divisions
<i>Funding Source:</i>	Various City Funding Sources; State and federal funding as available
<i>Timeframe/Objective:</i>	Publish General Plan Annual Report in December 2016, with reports being filed in December of each year. Convene General Plan Implementation Committee in the first quarter of 2017. Review location of infrastructure projects annually and identify high need, deficient areas for infrastructure prioritization by December 2017. Establish a residential rental inspection program by December 2017. Conduct an affordable housing/ transportation access study in 2018. Implement the actions described in bullet #7 above.

### **Program 28 – Relocation Services**

In certain situations, tenants who have been served with a notice to vacate may be entitled to relocation assistance. Where individuals or families are displaced due to redevelopment or rehabilitation activities funded by the City, the City shall provide relocation assistance as prescribed by law.

<i>Responsibility:</i>	Development and Resources Management Department Housing and Community Development Division
<i>Funding Source:</i>	Various City funding sources
<i>Timeframe/Objective:</i>	Provide relocation assistance as prescribed by law as needed.

## **Quantified Objectives**

Table 6-1 summarizes the City's quantified objectives for the 2015-2023 planning period by income group.

- RHNA Objective (a) represents the City's remaining (after counting as credit the units with approved or issued permits) 2013-2023 RHNA of 22,178, in addition to the remaining unaccommodated portion of the 2008-2014 lower-income RHNA ( 4,873 units).
- Rehabilitation Objective (a) represents the City's Housing Rehabilitation Program Objectives.
- The Conservation objective refers to the preservation all 5,339 units in the at-risk properties identified in the 2015-2023 Housing Element.

**Table 6-1: 2015-2023 Quantified Objectives**

Objectives	Income Levels				Total
	Extremely/ Very Low	Low	Moderate	Above Moderate	
RHNA Objectives (a)*	7,971	5,736	3,228	10,116	27,051
Rehabilitation Objectives (b)		216	--	--	216
Conservation/Preservation Objectives (c)			5,339	--	5,339

\*Note:

- RHNA Objective (a) represents the City's remaining 2013-2023 RHNA of 22,178, in addition to the remaining unaccommodated portion of the 2008-2013 lower-income RHNA (4,873 units).
- The City of Fresno is not responsible for the actual construction of these units. The City is, however, responsible for creating a regulatory environment in which the private market could build these units. This includes the creation, adoption, and implementation of General Plan policies, zoning standards, and/or incentives to encourage the construction of various types of units.



# FRESNO General Plan 2015-2023 Housing Element APPENDICES

Development and Resource  
Management Department

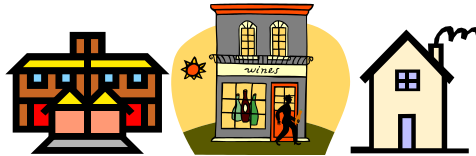


# Appendices



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## Appendix A: Outreach Materials



The City of Fresno wants your input on housing needs in your community for the update of its Housing Element. The Housing Element is the city's housing plan for the next 8 years and is part of the Fresno General Plan. It includes strategies for accommodating regional growth, including affordable housing. If you have ideas or just want to learn, here's how you can participate:

La Ciudad de Fresno solicita su opinión sobre las necesidades de las viviendas en su comunidad para actualizar el plan de vivienda llamado en inglés Housing Element. El Housing Element es el plan de la ciudad para los próximos 8 años y es parte del plan general de Fresno llamado en inglés Fresno General Plan. El cual incluye estrategias para hospedar el crecimiento regional y viviendas asequibles. Si usted tiene algunas ideas o solamente desea informarse, aquí esta como puede participar:

Lub nroog Fresno xav tau koj lub tswv yim rau cov vaj tsev xau tau nyob rau hauv koj lub zej zog rau cov hloov tshiab ntawm nws tsev caij. Lub tsev caij yog lub nroog (Fresno) tsev npaj 8 lub xyoo tom ntej no thiab koj yogi b feem ntawm lub hom phiaj (Fresno General Plan). Nws muaj tswv yim kom nruj lub regional, taab xws li vaj tse pheej yig. Yog hais tias koj muaj tswv yim los yog xav kawm, koj yuav tau mus koom:

**Call/ LLame/ Hu rau**

(559) 621-8062

**Email/ Mande un Correo Electrónico**

HousingElement@fresno.gov

**Mail/Correo/ Xa ntawv**

Fresno City Hall, Long Range Planning  
2600 Fresno Street, Fresno, CA 93721

**Visit Website/ Visite la Pagina Red**

[www.fresno.gov/housingelement](http://www.fresno.gov/housingelement)

**Come to a Workshop! (See schedule on reverse)**

**Venga a un Taller! (Mire el calendario al dorso)**

**Tuaj rau peb cov Workshop! (Saib raws sij hawm nyob tom qab daim ntawv no)**

# October/November 2015

All meetings will start at 6:30pm

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
<b>19</b> <b>Cooper Middle School, Cafeteria</b> 2277 W. Belaire Way	<b>20</b> <b>Teague Elementary School, Cafeteria</b> 725 N Polk Ave	<b>21</b> <b>Center for New Americans, Training Room</b> 4879 E. Kings Canyon	<b>22</b>	<b>23</b>
<b>26</b> <b>Duncan Polytechnic High School, Cafeteria</b> 4330 E. Garland Avenue	<b>27</b> <b>Awahnee Middle School, Cafeteria</b> 1127 E. Escalon Ave	<b>28</b> <b>Mayfair Elementary School, Cafeteria</b> 3305 E. Home Avenue	<b>29</b>	<b>30</b>
<b>2</b> <b>Edison High School, Cafeteria</b> 540 E. California Ave	<b>3</b> <b>Fancher Creek Elementary School, Cafeteria</b> 5948 E. Tulare Avenue	<b>4</b>	<b>5</b>	<b>6</b>

The meeting room is accessible to the physically disabled, and the services of a translator can be made available. Requests for additional accommodations for the disabled, signers, assistive listening devices, or translators should be made one week prior to the meeting, however every effort will be made to accommodate later requests. Please call Development and Resource Management Department staff at 559-621-8277 or 621-8062.

El cuarto de la reunión es accesible a los físicamente incapacitados y los servicios de un traductor pueden ser hechos disponible. Peticiones para servicios adicionales para los incapacitado, los firmantes, aparatos de escuchar o los traductores deben ser hechos una semana antes de la reunión. Por favor llame a el Departamento de la Planificación y el Desarrollo en 559-621-8277 o 621-8062.

Chav sablaj muaj rau cov tibneeg xiam ooqhab, thiab muaj tibneeg txhaislus rau cov uas xav tau kev pabcuam. Yog thov kev pabcuam rau cov tibneeg xiam ooqhab, cov hlua ntsaws pobntseg mloog haislus, los yog tibneeg txhaislus, nej yuav tau hais tuaj ib asthiv los yog ib limpiam ua ntej lub rooj sablaj. Nej hu tau rau peb cov tubtxib ntawm tus xovtooj: 559-621-8277, 621-8062.

# Draft Fresno Housing Element Update Outreach Summary

To obtain public input at the initial stages of the City of Fresno's housing element update, 9 community workshops were held in all of the seven city council districts. An additional meeting was held in Council District 1 to obtain better geographic coverage, and a 9th meeting was held at the Center for New Americans in order to reach out to the Hmong Community. With the exception of this meeting, which was held at a community center, all of the meetings were held at elementary and middle schools in low income census tract areas.

Table 1 below summarizes the outreach conducted for the workshops and Table 2 (next page) summarizes the workshops.

**Table 1: Workshop Outreach**

Outreach Summary			
Item	Date sent or published	Details	Number of recipients
Press Advisory			
Email	October 14, 2015	Email to housing advocates, General Plan Update mailchimp subscribers, and City of Fresno board and commission members announcing Housing Element Update process and Housing Element Update Workshops. Email included Housing Element Update Flyer for schools (see below) in English, Spanish and Hmong.	525 email addresses
Webpage Established	October 15, 2015	Website established with Housing Element Update summary and process, with workshop agenda and schedule in English, Spanish and Hmong. Webpage: <a href="http://www.fresno.gov/housingelement">www.fresno.gov/housingelement</a>	
Email	October 20, 26, and 30, 2015	Email reminder for Housing Element Update Workshops	525 email addresses
Flyer	October 15 – 30	Housing Element Update Flyer with Workshop Schedule was sent to all students at schools where workshops were held. Flyer in English, Spanish and Hmong	8,675 flyers delivered to students
Fresno Bee Display Ad	Monday, October 19 <sup>th</sup> , 2015	General Fresno Bee display ad announcing the Housing Element Update process, with a phone number to call, a website and email address to obtain more information. In English, Spanish and Hmong	Total Fresno Bee Circulation weekdays is 98,000
Fresno Bee Display Ad	Sunday, October 25, 2015	Fresno Bee Display ad announcing the Housing Element Update process, with workshop schedule and the phone number, website and email contacts above. In English, Spanish and Hmong.	Total Fresno Bee circulation on Sundays is 133,000

# Draft Fresno Housing Element Update Outreach Summary

**Table 2: Workshop Summary**

Workshop Summary			
Date	Location	Workshop Description	Attendance
October 19, 6:30 p.m.	Cooper Middle School	Held in school cafeteria. Signage posted. Spanish and Hmong translators present. Agenda in English, Spanish and Hmong. Handouts of powerpoints made available in English, Spanish and Hmong.	2
October 20, 6:30 p.m.	Teague Elementary School	Same as above	6
October 21, 6:30 p.m.	Center for New Americans	Held in meeting room. Signage posted. Spanish and Hmong translators present. Agenda in English, Spanish and Hmong. Handouts of powerpoints made available in English, Spanish and Hmong.	5
October 26, 6:30 p.m.	Duncan Polytechnic High School	Held in school cafeteria. Signage posted. Spanish and Hmong translators present. Agenda in English, Spanish and Hmong. Handouts of powerpoints made available in English, Spanish and Hmong.	6
October 27, 6:30 p.m.	Ahwahnee Middle School	Same as above	3
October 28, 6:30 p.m.	Mayfair Elementary School	Same as above	4
October 29, 6:30 p.m.	Figarden Elementary School	Same as above	5
November 2, 6:30 p.m.	Edison High School	Same as above	16
November 3, 6:30 p.m.	Fancher Creek Elementary School	Same as above	10

## Workshop Comment Summary:

Approximately 140 comments and questions were received at the workshops. The comments can be summarized into the following major concerns:

1. Need more diverse housing types in closer proximity to one another. Need more “high end” housing in some neighborhoods and need more modest/affordable housing in other neighborhoods. Need more choices in all neighborhoods.
2. Need more resources focused on older neighborhoods: abandoned homes and related crime, illegal dumping, poorly maintained rental properties were all mentioned as common issues.
3. Homelessness is perceived as a continuing problem that is geographically spreading to all areas of the city.

## Draft Fresno Housing Element Update Outreach Summary

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4. More affordable housing is needed.
5. Housing discrimination can occur when the only option to apply for housing or a related benefit is via computer, since not everyone has access to a computer or is computer literate.

### **Potential Solutions offered by Workshop Participants**

1. Adopt a program of inclusionary zoning.
2. Provide fee waivers for the development of affordable housing.
3. Establish a rental re-inspection program that requires periodic inspections of rental units to ensure compliance with health and safety rules.

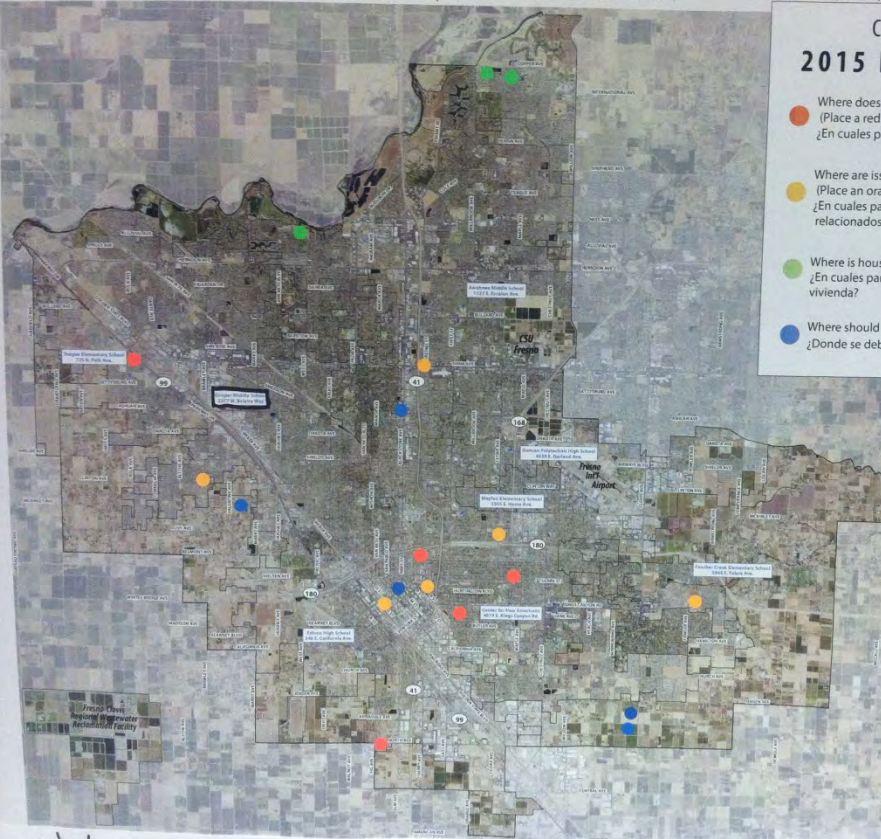


Workshop #1 at Cooper Middle School

October 19, 2015

## CITY OF FRESNO 2015 HOUSING ELEMENT

- Where does housing need to be improved or rehabilitated?  
(Place a red dot)  
¿En cuales partes de la ciudad se podría mejorar la vivienda?
- Where are issues of homelessness most prevalent?  
(Place an orange dot)  
¿En cuales partes de la ciudad son prevalentes los problemas relacionados a las personas sin hogar?
- Where is housing unaffordable? (Place a green dot)  
¿En cuales partes de la ciudad es prohibitivo el costo de la vivienda?
- Where should new housing be located? (Place a blue dot)  
¿Dónde se deberían localizar nuevas viviendas?



### Housing Element Workshop Locations

- City Limits
- Sphere of Influence

0 0.75 1.5 3 Miles  
Date: October 2015  
Source: City of Fresno GIS, 2015

Workshop #2 at Teague Elementary School

October 20, 2015

## CITY OF FRESNO 2015 HOUSING ELEMENT

- Where does housing need to be improved or rehabilitated?  
(Place a red dot)  
¿En cuales partes de la ciudad se podría mejorar la vivienda?
- Where are issues of homelessness most prevalent?  
(Place an orange dot)  
¿En cuales partes de la ciudad son prevalentes los problemas relacionados a las personas sin hogar?
- Where is housing unaffordable? (Place a green dot)  
¿En cuales partes de la ciudad es prohibitivo el costo de la vivienda?
- Where should new housing be located? (Place a blue dot)  
¿Dónde se deberían localizar nuevas viviendas?

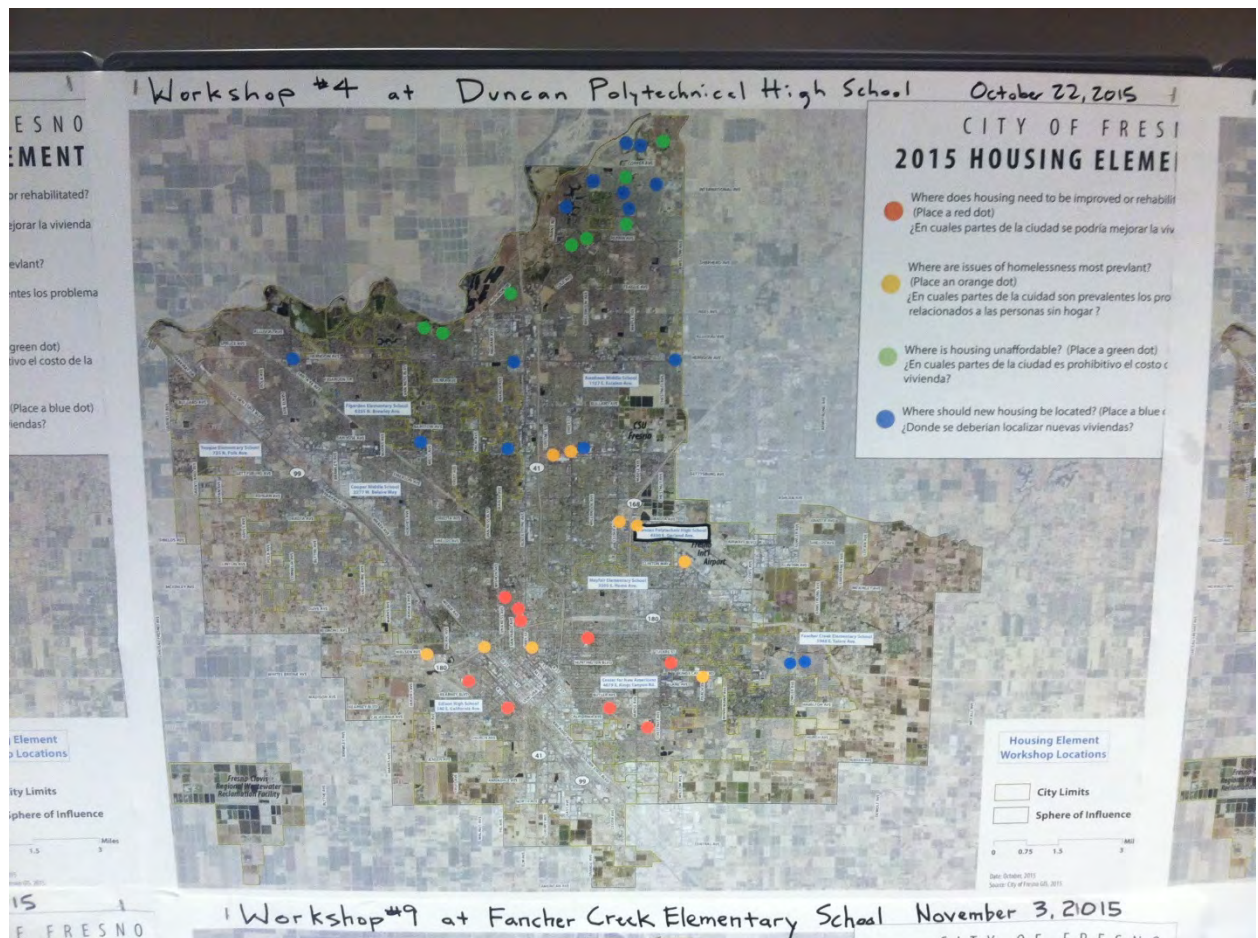
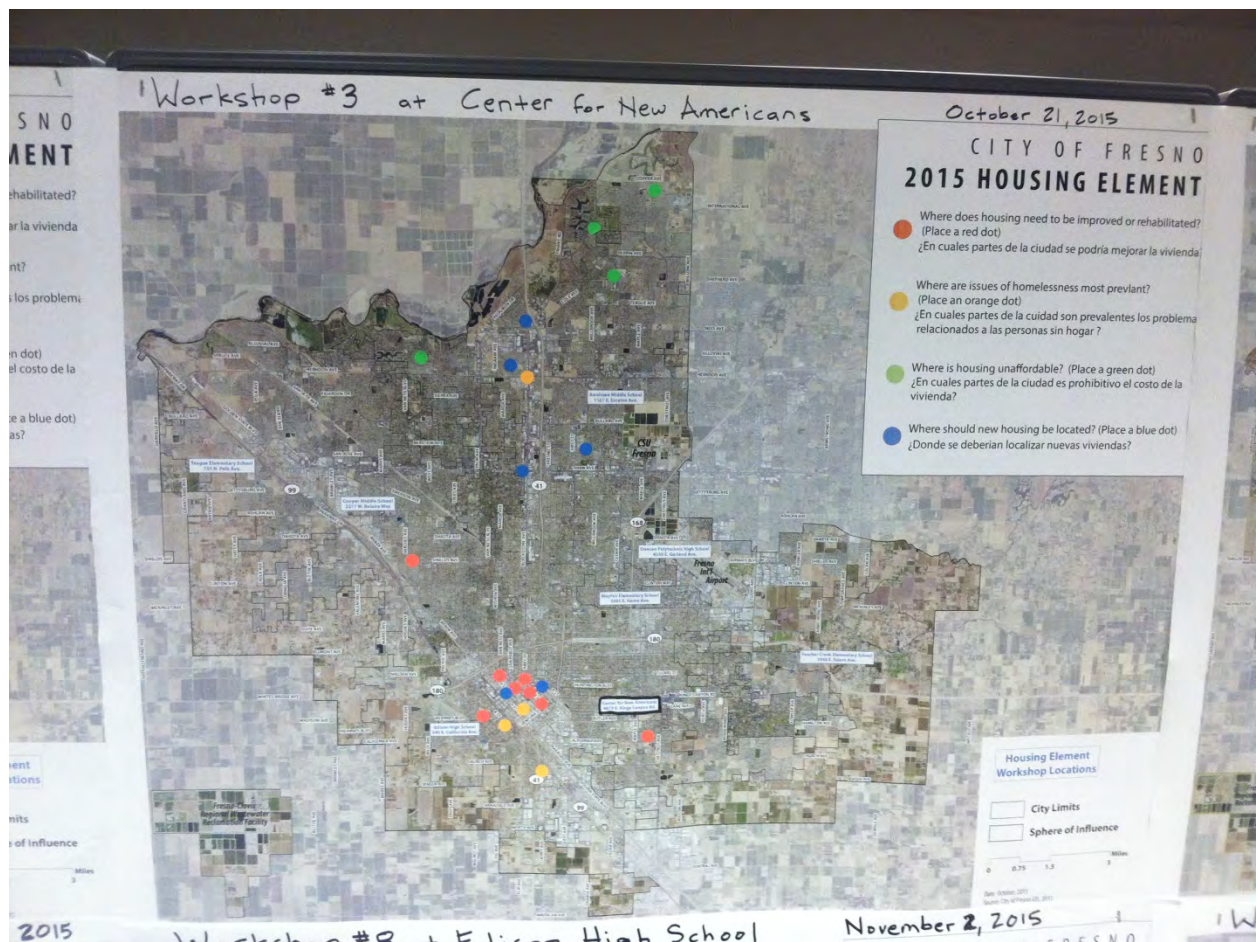


### Housing Element Workshop Locations

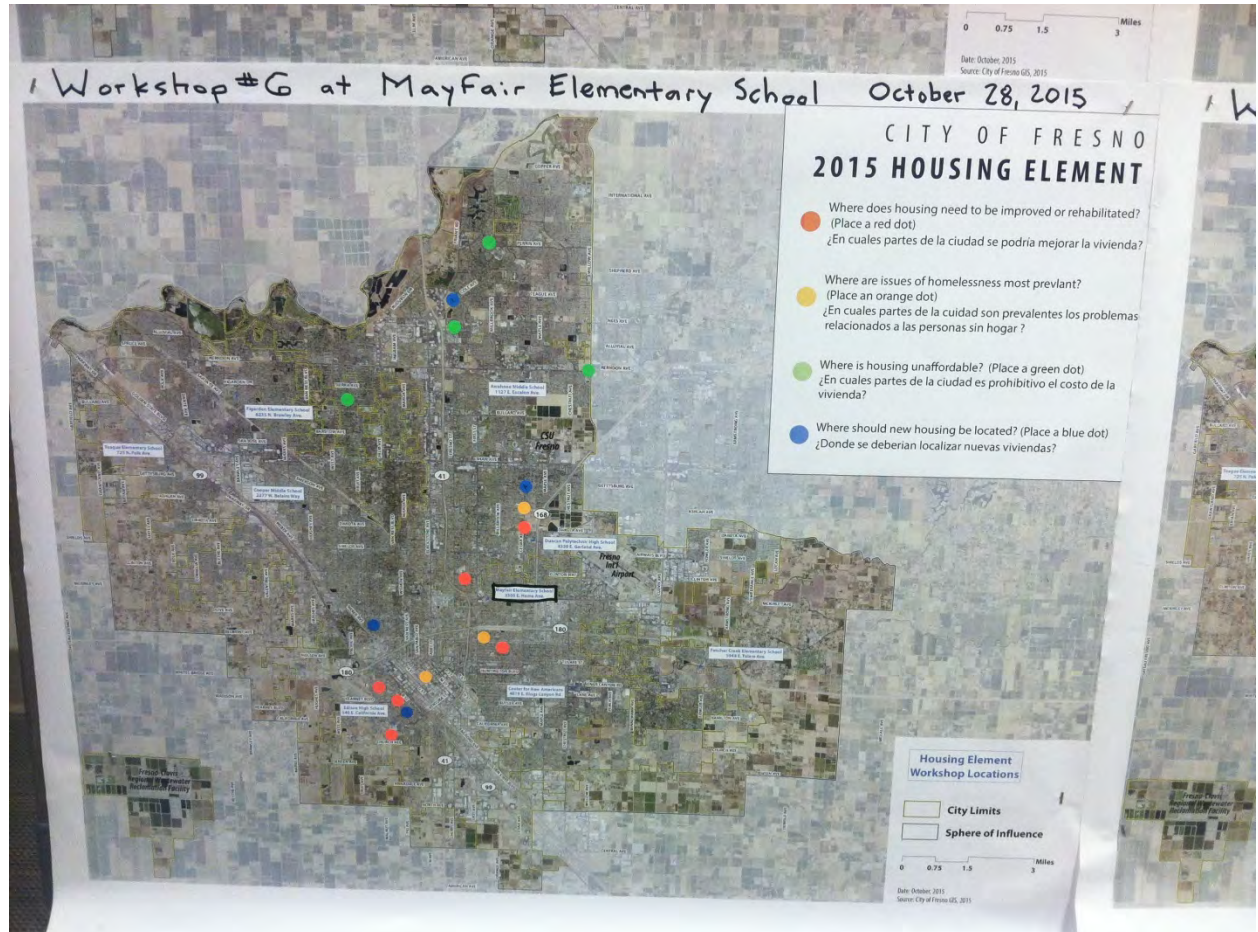
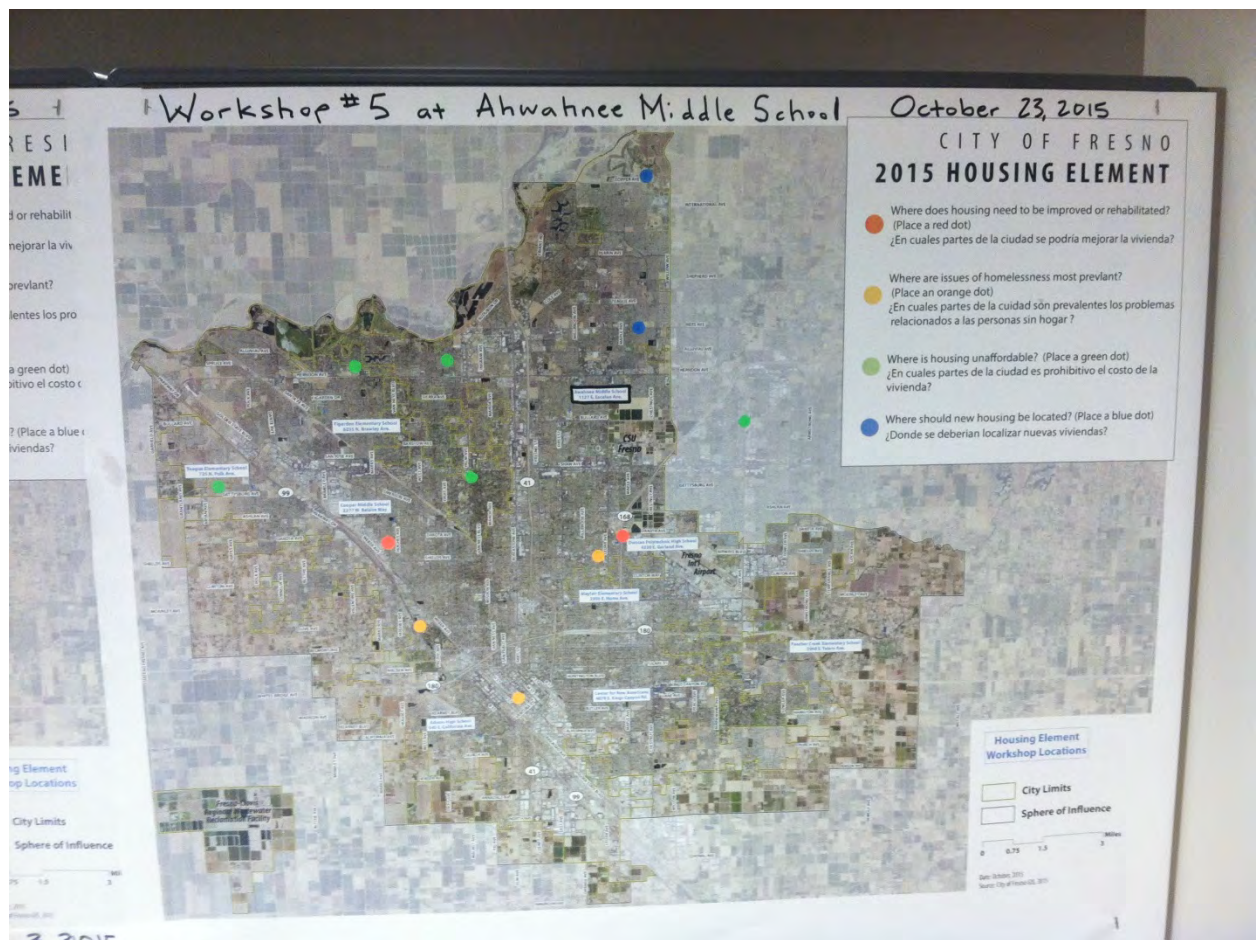
- City Limits
- Sphere of Influence

0 0.75 1.5 3 Miles  
Date: October 2015  
Source: City of Fresno GIS, 2015

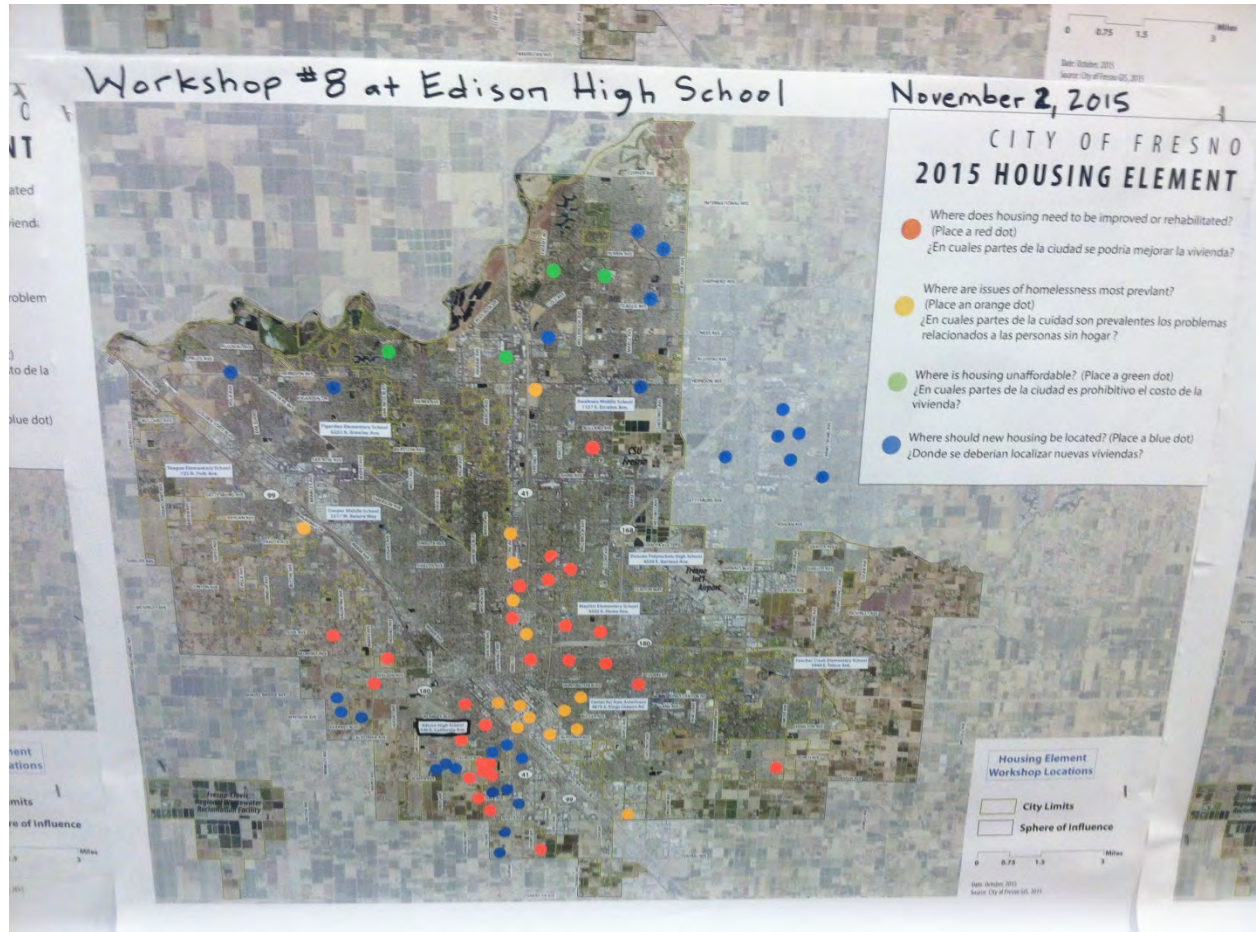
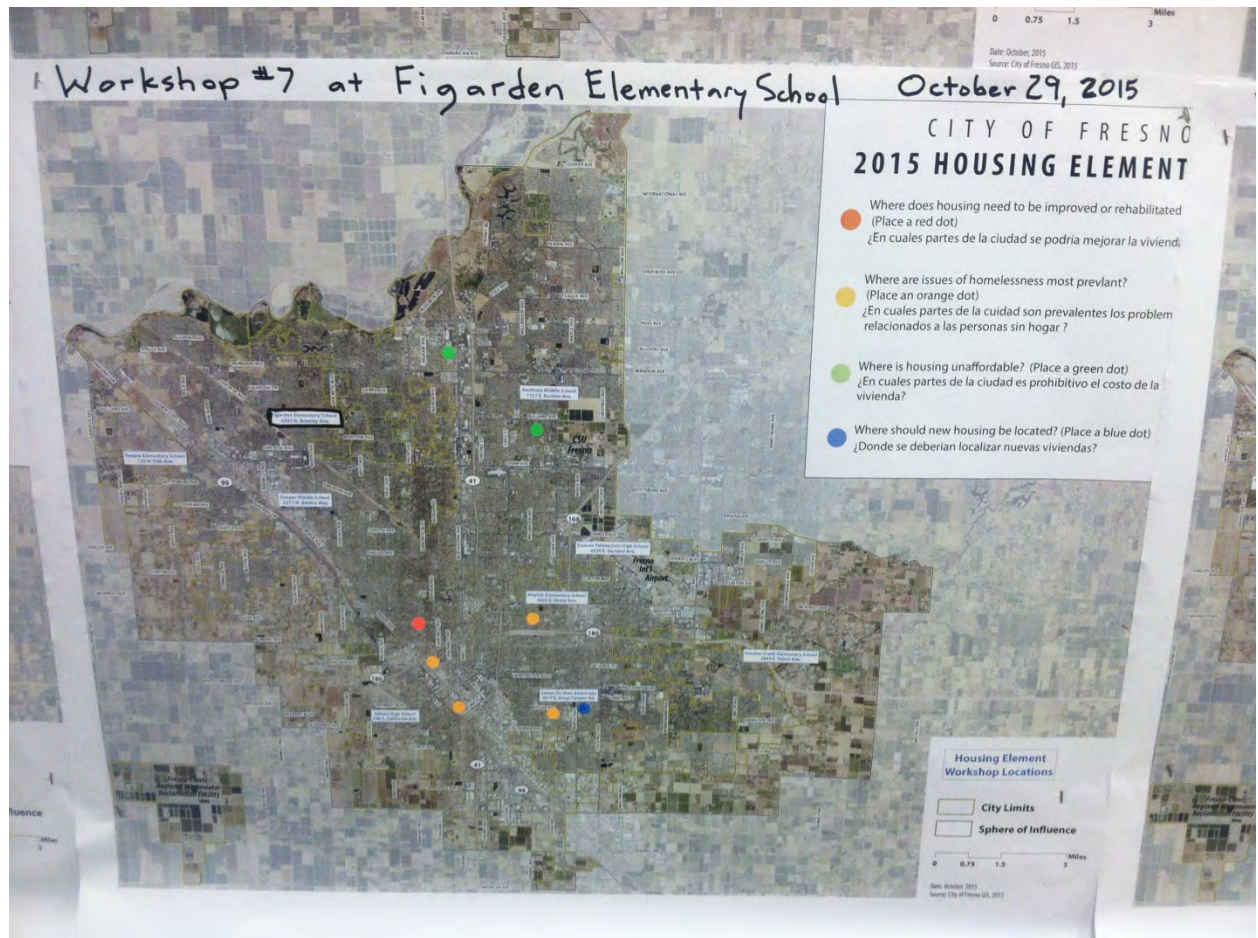














Workshop #9 at Fancher Creek Elementary School November 3, 2015

# CITY OF FRESNO 2015 HOUSING ELEMENT

- Where does housing need to be improved or rehabilitated?  
(Place a red dot)  
¿En cuales partes de la ciudad se podría mejorar la vivienda?
- Where are issues of homelessness most prevalent?  
(Place an orange dot)  
¿En cuales partes de la ciudad son prevalentes los problemas relacionados a las personas sin hogar?
- Where is housing unaffordable? (Place a green dot)  
¿En cuales partes de la ciudad es prohibitivo el costo de la vivienda?
- Where should new housing be located? (Place a blue dot)  
¿Donde se deberian localizar nuevas viviendas?

## Housing Element Workshop Locations

- City Limits
- Sphere of Influence

Date: October 2015  
Source: City of Fresno GIS, 2015

Comments Received at Housing Element Workshops (October - November 2015)
Affordability is not the issue. Foreclosures are not an issue. The high end housing market is good. The issue is dilapidated housing. Focus on rehabilitation and fixing blighted housing in inner city neighborhoods.
Granville's Downtown units are slow to fill up. There are not enough amenities in Downtown. Granville has invested for the long term hoping the amenities will eventually come.
West of HWY 99 there has been lots of housing growth of typical starter homes, but then they leave the area.
West of HWY 99, we would like to see more diversity of housing, more affordable housing, and more high end housing.
West of HWY 99, there are infrastructure issues.
West of HWY 99, need growth to justify better retail. Need services nearby to make the community walkable and safe.
West of HWY 99, there is a lack of affordable housing and home ownership
West of HWY 99, there is a loss of community pride among owners and renters, the housing is old and dilapidated.
West of HWY 99, liquor stores attract crime, graffiti and increases indigent population.
West of HWY 99, run down hotels being used as housing and apartments owned by slumlords are rundown.
West of HWY 99, foreclosures are not an issue.
West of HWY 99, entire built and partially built homes in subdivisions built 3 to 4 years ago are being left abandoned, occupied by homeless and vandalized.
I am a pastor and our church has extra land that we would like to see affordable housing built and thriving communities grow in this area. On this site we also plan to build a community center with a library and childcare center.
Landlord (JD Homes) hasn't repaired the rental house we live in in 15 years.
Tower needs rehabbing
Homelessness in Tower, along Weber Corridor and along major cross streets. There are more chronic than recent homeless. Agencies: "MAP" - Multi-agency.
People pay too much for housing and it needs repair.
Downtown has more chronic Homeless. HWY City has 400 homeless everyday. There is no agency that takes entire families.
City requires 85 foot clearance on property which leaves little room to build anything.
Granville Homes is committed to rehab homes in Downtown, mostly rentals, but there are difficulties related to historic preservation and fire/homeless issues.
Housing Authority wants to build more houses in the north and close to jobs. We have traditionally built in the southern area.
Homelessness - Housing Authority. Do homeless survey. Would say most severe homelessness is Downtown where services are higher.
Housing Choice Voucher - 20,000 on wait list - based on need/lottery.
RDA Funds and Home Funds cut.
Looking at Cap and Trade for Clinton and Blackstone
Density - Development Code - how do things pencil?
Acquisition Rehabs - not happening due to lack of developer interest.
What is CEQA process for Housing Element?
How many acres are available for development in infill vs. growth areas?
Response to Question #3: The City needs to put a list of constraints together to make it easier for developers to build housing whether it be fees, land restrictions, zoning etc...
Response to Question #3: How about eliminating fees in parts of the city that need help the most.
You stated that the Housing Element must be done by the end of April to get done or the City may miss out on grant funding. What grant funding?
According to my calculations, the City would need 900 acres to meet the required affordable housing needs. How long do we have to show we can do this?
Responding to Question #1: Is the new housing affordable or any kind?

Comments Received at Housing Element Workshops (October - November 2015)
Responding to Question #1: Major housing issue in Fresno are the high number of unaffordable housing, blight and run down existing housing, and small amount of owners who own property that drive the value up.
Responding to Question #1: People complain to the City, but nothing gets done.
Responding to Question #3: When people in Fresno pay more than 30% for housing there is fewer affordable housing than the demand.
Responding to Question #3: Over production of Moderate to Above Moderate Housing in Fresno.
Responding to Question #3: Many cities are using inclusionary housing so that people with low-incomes can live in places like Copper River.
Responding to Question #3: Developers get substantial benefit when the City allows them to develop so the City needs to make demands of developers to get affordable housing.
Responding to Question #3: I'd support a fee waiver (as suggested by Jeff Roberts) for truly affordable housing with in the City Limits.
Responding to Question #3: I think a list of constraints is good (as suggested by Jeff Roberts). Keep them realistic. We want to make sure developers can contribute.
Responding to Question #1: No one enforcing blighted housing.
Responding to Question #2: Discrimination is on the technology side. Need to have applications for people to get that is not on-line, because many people in need of affordable housing do not have computers or internet access.
Responding to Question #2: The wait is too long to get into affordable housing...could be 10 years.
Responding to Question #4: Who can help with affordable housing programs?
How many years of housing does the City need to demonstrate? In the SOI or City Limits?
How many of the 20,000 homes from last time got built?
Will you amend policies in the General Plan? Would this happen as part of the CEQA process?
Hypothetically you may need to do a GP Amendment to make everything jive.
Responding to Question #3: Governmental constraints such as the Development Code can make doing business harder. We are working with the City to figure out how to streamline better, but the added requirements become expenses that get passed onto the homeowner. All the amenities and programs that the City likes are not affordable.
Who owns the houses the City is providing?
The State decides what type of housing?
The public adoption hearing is for what?
How long has the Housing Element adoption process been around?
Is the County mandated to do a Housing Element as well?
Is this workshop going to be held in the north part of town?
How can the purple be made available for housing?
Responding to Question #3: You can only be made aware if you are here.
Responding to Question #4: We need multi-generational homes. Different ethnic groups really want this.
Are there housing subsidies available from the State for the City other than Section 8?
Are you dialoguing with Fresno County to deal with housing projections in SOI? How is the City interacting in this role?
Joe Manicozzi spoke twice in Fresno about mixed-use as a very good thing that increases the value of the property per acre...the tax revenue generated. Changing the way we live then we can do more things. Wal-Mart's and sprawl are not good compared to higher density and mixed-use. There are cities that many people are not reliant on a car, but we need density to have that here.
Responding to Question #1: Purple areas are along corridors and adjacent to businesses and the lower rents are in the southwestern part of the city. It would make for more diversity if a mix of style and affordability was throughout the city.
Responding to Question #2: Indirectly in size and style of housing for example in North vs. South. Related to income difference in city.
Responding to Question #3: Jobs...types of jobs (low salary base) make difficult for people to buy.

Comments Received at Housing Element Workshops (October - November 2015)
Responding to Question #4: City has built in particular direction and not thought about mixed-use or condos or tiny houses. Should allow and plan for making smaller homes.
What survey was used to determine that 6% of housing units are in need of rehabilitation?
Could you explain the Housing Element process slide regarding Revising Housing Policies and Programs and Prepare Draft Element by giving examples?
Responding to Question #1: Affordable housing needs to be spread throughout the city. Existing housing is unsafe and unhealthy and therefor inhumane. Abandoned homes are being addressed in the city, but not the inhabited existing housing that is unsafe and unhealthy to live in. Tenants feel neither safe nor empowered to seek support from the City. Other cities have put in place routine inspections and the City of Fresno should do the same.
Responding to Question #4: Improve Code Enforcement by creating an inspection program for existing housing. City should consider imposing fees and fines to protect our housing and renters.
Can you explain or show what 20 units to the acre and 30 units to the acre looks like.
State law provisions at Health & Safety Code Sections 17021.5 and 17021.6 respectively require jurisdictions to allow farmworker housing for 6 or fewer persons by right in residential districts and to allow farmworker housing of up to 36 beds or 12 dwelling units as an agricultural use where ag is allowed is this provision addressed in your Citywide Development Code?
Responding to Question #1: Lack of housing for large families. There is overcrowding. Consolidation Plan says 30% where the slide in your presentation says 10%...consider coordinating
Responding to Question #1: There is a need for affordable housing spread throughout the city. Invest in existing neighborhoods. Fix deficit of parks.
Responding to Question #1: There is a provision in the Housing Element that is supposed to address certain aspects for the homeless.
Responding to Question #4: There should be a program for the City to use grant funding to spread housing opportunities including mixed-use throughout the City.
In her neighborhood there is a need for parks. The streets are not safe for their kids to play in. It is because there are no parks that people are hoping school fences and vandalizing. When are the schools going to open for use as park space?
In her rental agreement she cannot have pets, but her neighbors have pets and they let them wonder the streets. This isn't safe for our kids. What can be done about this?
Responding to Question #1: I'd like to see better quality affordable housing where I live. It would be a disruption for me and my family to move (i.e. school and friends). A lot of my friends and neighbors feel the same way. They work in ag and don't feel they are entitled to give their opinion.
Responding to Question #1: There are vacant units in my apartment where homeless people break into and they use the water. I don't like the homeless issue in my apartment complex.
There needs to be an equal allocation of resources. There are problems with our neighborhoods. These problems communicate to residents that they have no value. For example, I picked up syringes within 20 feet of a tot lot at Radio Park (First and Clinton). Inside the public restroom (port a potty) there was graffiti, pornographic material and a shopping cart. A father playing with his kids in the park had to take his son in there to use the restroom. We need to hit these problems with clean-up crews. Moving forward we need to decide if we are going to maintain the existing parks.
What does rehabilitation mean?
Does the GP have enough density to accommodate RHNA?
How well has the City met it's former Housing Element? Number of affordable housing units?
Inclusionary Housing - can you explain this?
Are there City policies in the General Plan to meet these goals? In a housing element document, are there policies? i.e. - "inclusionary housing shall be required," etc.

## Comments Received at Housing Element Workshops (October - November 2015)

At District 2 meeting, the Councilmember, Police Dept., DPU, and Bruce Rudd addressed the topic homelessness. It's not illegal. It's a law enforcement problem. City asks people to not give out money. Majority are not homeless. That's vagrancy. A lifestyle, but homelessness is a condition. They have services. They get everything free. Vagrants make money. Recycling center equals more burglaries and car thefts, but the State mandates recycling centers. Homeless are concentrated on major transportation corridors. Police creating new positions, checking recycling centers, people stealing from blue bins.

Agree with same, but there are homeless living in river bottom who have no place. Restorative Justice in San Jose and Santa Barbara with Housing Program. Look into where they got there funding. Coupled with criminal justice. Must attend programs and adhere to rules.

Salt Lake City almost completely solved their issue of homelessness. They targeted the right people. Inclusionary Housing allows some people in the neighborhoods, but also raises prices for everyone else. Be cautionary with it.

Too much density in apartments - Church and Jensen too many kids and not enough open space - well designed. Individual back yards better.

Need to plan for future generations

Decline in jobs so children leave

Problem with absentee landlords and overcrowded housing

Why is California BRT the last phase of the line to go in when SW Fresno needs it.

Does this apply to our area or citywide? In District 3 there is a lot of property that hasn't been occupied. Are there particular areas that you plan to do this housing?

Is this meeting a spinoff of the meetings that have been occurring at Gaston Middle School?

How was this meeting advertised?

Did your advertising follow the H.U.D. Guidelines? I have the H.U.D. Guidelines here and it tells you about the notice of the public hearings. Publishing small print notices a few days before the hearing does not constitute adequate notice. You didn't follow the guidelines.

In regards to the SWSP Steering Committee, why wasn't there any community meetings for this Committee? We didn't know about the Steering Committee until we went to the meeting. How did you come up with the Steering Committee and the community wasn't involved with that?

Does the Housing Element go into the General Plan with the SWSP? Why is it that you're trying to separate it? If you passed it already how is that you are having community meetings on something you've passed already?

Was the 57% of the households that need to be built in the City of Fresno is that based on the income of a particular area of the City or for the whole city.

How are the RHNA numbers determined?

Are all the cities represented on the RHNA chart in Fresno County?

How many people are assumed to live in a housing unit?

When you speak of 20 or 30 du/acre are you talking about apartments?

Revised housing policies will there be time to provide input because I know with the housing subcommittee for the SWSP we are saying no more shotgun houses. Is that something that can still be an input so we can make that a policy?

What is the last day for public comment?

In the email you sent out for this meeting there was a link for public comment. Would you say that this is the most effective way to make sure our comments are registered in writing?

I asked two weeks ago about the consultant that was hired. I know it is someone from out of town. Can I ask when they were hired? The reason I'm asking is because it looks like the City is in a bit of a pickle to get this thing done on time so as not to do this every 4 years rather than every 8 years. My concern is that no one in the room or anyone at the meetings has seen any type of draft and you said tonight that your not going to have meetings to look at the draft. The problem is that it's difficult for the public to comment when you're limited to 3 minutes at the podium on a 500 page document. Since I don't know what the Housing Element is going to look like it's really hard for me to give you input that means anything until we see what your ideas are. So I'll ask again, when did they get hired? Very recently?



## Comments Received at Housing Element Workshops (October - November 2015)

So in terms of constraints for providing housing, you can't do anything about environmental or market, but you can do something about the governmental issues. The City Development Department is planning to rezone the entire city so during this process you should consider rezoning all the land that is in the SOI to make it easier, cheaper and faster to develop. Removing impediments is one of your charges.

There are numerous code issues that the Code Update is going through right now that are going to make it tougher to develop. I think some of those things need to be eased to make it faster and easier to develop

Another obvious issue is fees. The City charges a lot of money for fees (i.e. entitlement, processing, and use fees) you should be looking hard at that and ask yourself whether it is an impediment or an improvement?

What is the purpose of the consultant?

Will the Housing Element include a plan for homelessness?

If the Housing Element was part of the General Plan that got passed last year why are you coming to the community like this is something new when it's not?

All of these bungalow houses, shotgun houses and everything that you're talking about you started building the stuff Downtown already. That was passed way before last year. Why is it that you keep running to this neighborhood after you've done everything, you passed everything. You're tricking the community into thinking that we have an input when we don't.

We get 3 minutes at City Hall and you got a consultant that you took our money. This is our HUD money. We are interested in our community and you should know that. You guys come in here tearing up stuff, pulling up stuff and leaving it and then tell us this is what we are going to do. So we're tired of it. So when you come to our community you are supposed to ask just like someone coming to your house. There's no way we are going to come to your house and tell you what we are going to do in your house. You wouldn't stand for it, but you guys keep doing that to us year, after year, after year and then you wonder why there aren't many people here tonight. It's because they're tired of it. You take up hours of our time and then want to set us up with a devilish map, write something on it, and what do you do with it, nothing, because you guys already have your plan. You passed it already. So how is it that you already passed this stuff last year and now you want to bring it to our community and ask us for input on something you've already passed. Now you're talking about a draft. You already had a draft of your 2035 General Plan which includes what you're talking about.

When talking about building more affordable housing the 30% will be achieved through higher density by private market. Is there any other methods or strategies that the City is thinking or encouraging for other players to do the affordable housing? On one side we have the Housing Authority for affordable housing and the private market for market rate housing are there any public/private partnership between any private developers and public entities like the Housing Authority to provide more housing?

Is the City coordinating their efforts with the County and other surrounding communities. You mentioned that the County is working on their Housing Element at this time. The City's General Plan is seeking higher densities in its SOI and if the County isn't on board with that. Will there be a problem getting the higher density planned?

I live in an increasingly blighted area of Fresno

Does the Housing Element address environmental concerns such as air quality and scarcity of water. It seems that the farther out we grow the more these two issues are impacted.

Beyond the Elm Corridor has the City identified other Brownfield Areas that have poor zoning or environmental hazards that are not good for single family and multi-family housing?

If a Brownfield can't be used for housing what are some of the things it can be used for?

Do you have any housing programed in SEGA in the life of this Housing Element?

Will priority be given to infill verses new housing development or will it be based on the need or what the City decides is the need for housing? We have so many vacant lots in older neighborhoods that contribute to blight, because no one wants to live there or live next to a vacant lot. If the community decides that they want more infill housing to reflect existing housing so a new home doesn't look like a sore thumb and so a giant low income multi-family project isn't built next to a single family home. Should this be something we make as a policy?

Do you know why Jenson Avenue, a major transit route, was left out of the General Plan?

What is the purpose of identifying where housing is unaffordable? What will that accomplish for this particular group?

Responding to Question #1: There are so many houses that are messed up

### Comments Received at Housing Element Workshops (October - November 2015)

Responding to Question #1: There are houses with people in them that are blighted though they look abandoned. Renters don't take care of properties they rent

Responding to Question #1: Liquor stores attract these bad people.

Responding to Question #1: I'm tired of having to clean up my rentals that the homeless people brake into and damage

Responding to Question #1: There are a lot of homeless people along Fancher Creek

Responding to Question #3: Market for low income housing that's all they can afford. Owners take advantage of that and don't take care of their rentals. They are unsafe and unhealthy. Renters don't speak up, because they are afraid to lose the housing. Solution could be Code Enforcement, neighborhood groups, renters and other land owners to come together and put pressure on the bad landowners.

Responding to Question #3: Code Enforcement is important to keep housing safe. They need to respond to calls. It helped a lot on his street when he called his councilmember. Community needs to organize. Important to equally spread out affordable housing throughout the City.

Responding to Question #3: I've worked hard in the last years to clean up neighborhoods. I have asked for years that the City clean up neighborhoods near recycling centers like at McKinley and Orange. Thanks to those carts my neighborhood looks like trash. I want Sal Quintero to visit. I have conducting community meeting at my house on this issue. We've cleaned up alleys behind out homes. Sad to see kids playing with trash and vagrancy in alleys and streets. Council member and assistant don't return my calls now. We have to work hard as representatives as well.

Responding to Question #3: Put program in Housing Element for educating public officials about why affordable housing is important.

Responding to Question #3: We have recycling facility by my house too. Loy of abandoned homes too. We need someone to be sent to build up those neighborhoods. We want environment for our kids void of drugs. We need community center like Mesqueda Center where parents can take classes to better their lives and for kids to play safely. We are people who deserve to live in dignity just as folks who live in the northern part of town. We don't want homeless in our part of town. We notice that there is no problem with homeless in the north.

Responding to Question #3: There is homelessness in the north, but it is worse in the south. I live in the Sunnyside area. Homeless going through garbage of businesses making it unsafe for business owners.

Responding to Question #3: As we plan new communities whether north, west, east or south it is important to plan with mixed-income in mind. Mix so we have healthier communities all around Fresno.

Must include inclusionary housing requirement in City development approval process. Housing Element policy.

Good job dealing with hostile people who do not understand the process. Unfortunately I am the almost 50% of the need but the "above moderates" which are left behind.

## Sophia Pagoulatos

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**From:** Marilyn Borelli <fleaforjustice@gmail.com>  
**Sent:** Wednesday, January 13, 2016 11:28 AM  
**To:** HousingElement  
**Subject:** Re: Housing Element Public Review Draft Available - Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Actually, had to use Google drive and save file to open....After reviewing, however, 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... 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.

On Wed, Jan 13, 2016 at 10:23 AM, HousingElement <[HousingElement@fresno.gov](mailto:HousingElement@fresno.gov)> wrote:

Hello Marilyn:

Did you try control/clicking on the link? That's usually the trick.

If not, try

this: <http://www.fresno.gov/Government/DepartmentDirectory/DARM/AdvancedPlanning/HousingElement.htm>

If that doesn't work, I'll email you a pdf of the draft!

## Sophia Pagoulatos

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**From:** John Cinatl <j.f.cinatl@sbcglobal.net>  
**Sent:** Wednesday, January 13, 2016 2:26 PM  
**To:** HousingElement  
**Cc:** Nick Paladino; Ed Smith; Anthony Molina, MD; Pedro (D6 Bikes) Ramirez; Lori Cherry; Dennis Ball  
**Subject:** Comments on Housing Element

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Greeting Fellow Planners

I did a quick search via the "fine" command in Adobe Reader and did not find the word "bicycle", "bike" or "bike rack(s)" in the two downloadable housing element files.

At minimum I suggest you 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 one of the units.

Also a discussion in regard to bike "storage" in multi-family units would be appropriate.

Further, if you include such an element I suggest you make reference to the Association of Pedestrian and Bicycle Professionals (aka - APBP at [www.apbp.org](http://www.apbp.org)) an professional organization that has developed an extensive bicycle parking guide regarding. That guide details the appropriate place to place racks (not in the alley next to the dumpsters), the appropriate type of rack (never the useless "wave" racks), the proper spacing between racks, the proper type of lockers, proper types of shelters etc., etc.

Hope to see these elements added to your final version.

Gotta run. Keep up the good work

John Cinatl, MCRP  
Caltrans - District 6 Bicycle Coordinator - Retired  
Clovis, CA

## Jeffrey Roberts

---

**From:** Jeffrey Roberts  
**Sent:** Tuesday, January 19, 2016 2:21 PM  
**To:** Sophia Pagoulatos  
**Cc:** Jeffrey Roberts; Jennifer Clark  
**Subject:** Re: 2015 Housing Element:

Thanks very much.

Sent from my iPhone

On Jan 19, 2016, at 2:02 PM, Sophia Pagoulatos <[Sophia.Pagoulatos@fresno.gov](mailto:Sophia.Pagoulatos@fresno.gov)> wrote:

Thanks Jeff. We will respond. Not sure what format yet.

---

**From:** Jeffrey Roberts [<mailto:JRoberts@gvhomes.com>]  
**Sent:** Tuesday, January 19, 2016 12:42 PM  
**To:** Sophia Pagoulatos  
**Cc:** Jennifer Clark  
**Subject:** 2015 Housing Element:

Sophia,

Thanks for your presentation today on the Draft Housing Element. As you are aware, I have attended multiple workshops and meetings on this topic. We are very interested in the wording of this document and will be following its progress to adoption by the City Council. I have been reading through the Draft Document text and have several questions that you may be able to answer:

1. On page 4.3, at the bottom of the page, there is a discussion on Annexation. 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?

2. Also on Page 4.3, in the middle of the page, 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?

3. On page 5-10, 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?

Thanks for your time and help.

**Jeffrey T. Roberts**

**Granville Homes**

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**1396 W. Herndon Suite 101, Fresno, CA 93711**

**559.436.0900 / fax 559.436.1659 / cell 559.288.0688**

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January 29, 2016

RE: CITY OF FRESNO DRAFT 2015-2023 HOUSING ELEMENT

DEAR MAYOR SWEARENGIN, COUNCILMEMBERS, and PLANNING STAFF.

WE ARE WRITING AS PARENTS AND RESIDENTS OF FRESNO'S "JANE ADDAMS" NEIGHBORHOOD TO SUBMIT COMMENTS REGARDING THE CITY OF FRESNO'S DRAFT 2015-2023 HOUSING ELEMENT. AS ACTIVE MEMBERS OF OUR COMMUNITY AND VOLUNTEERS, WE ARE IMPACTED BY ~~THE~~ THE CITY'S SHORTAGE OF AFFORDABLE + SAFE HOUSING + INTERESTED IN THE CITY'S ADOPTION OF A STRONG HOUSING ELEMENT TO ADDRESS IT.

THE FINAL HOUSING SHOULD INCLUDE THE FOLLOWING PROGRAMS :

(1) — THE CITY SHOULD ENHANCE ITS EFFORTS TO INFORM COMMUNITY ABOUT ~~BY~~ AFFORDABLE HOUSING PLANNING PROCESSES, LIKE THE HOUSING ELEMENT, + RESOURCES AVAILABLE TO RESIDENTS BY (1) PASSING OUT FLYERS AT RESIDENCES, (2) ATTENDING SCHOOL <sup>PARENT</sup> COFFEE HOURS + OTHER COMMUNITY EVENTS, + POST INFORMATION ABOUT ALL AVAILABLE RESOURCES + REQUIREMENTS WITH RESPECT TO AFFORDABLE HOUSING ON A CITY WEB PAGE IN ENGLISH, SPANISH, + OTHER LANGUAGES SPOKEN BY RESIDENTS

(2) Expand financing available to help first-time home buyers



- expand financing available to support home remodeling for old/deteriorated homes
- Create an inspection + code enforcement programs for <sup>second</sup> houses maintained + rented by residents in their backyards. These units are often unpermitted, in dangerous conditions, + light on fires, creating a danger to neighbors. Tenants are also often overcharged to rent these units - the city should enforce + enforce affordable + fair rental prices.
- An expanded rental assistance program for low-income residents, especially in winter when agriculture, + construction jobs are fewer + unemployment is higher
- Protection for undocumented residents: Landlords often overcharge undocumented residents. The city should act to prevent this and also ensure all housing programs + resources are available to undocumented residents. Do not ask for legal status documents for housing assistance.
- Program to assist residents with ~~the~~ payment for houses that have decreased in value due to the housing market crash to prevent foreclosures as well to assist in paying off <sup>past-due</sup> housing debt for low-income residents
- Enforce habitability laws against landlords to ~~address~~ address unsafe living conditions
- Enact a law to prohibit smoking in rental apartments + other areas where children live + play (including parks)



- Invest in our neighborhood and other low-income neighborhoods to ensure access to basic infrastructure, like sidewalks, streetlights, and stormwater drainage.

Please contact Ashley Werner at 559-369-2786 and Rosalena Carson at 559 477-5582 to set up a time to discuss these comments in person.

Araceli Bravo

Guillermina León

Maria Elena Suarez.

Graciela Cortes

Josefina V.

Maria del Carmen Padilla blz.

Enriqueta García

Ava Diaz

Imelda Berrellez

Rene Ortigosa

1. First of all, we need to know the  
length of the array. Let's call it  $n$ .  
Then we can find the middle element  
at index  $\frac{n-1}{2}$ . If the array is  
sorted, the middle element is the  
median.

2. If the array is not sorted, we  
need to sort it. Sorting takes  
time  $O(n \log n)$ . Then we can  
find the median as above.



February 5, 2016

Mayor Ashley Swearengin  
Fresno City Council  
Jennifer K. Clark, Director, DARM  
Sophia Pagoulatos, Planning Manager, DARM  
Fresno City Hall  
2600 Fresno Street  
Fresno, CA 93721

*Sent via Email*

**Re: City of Fresno Public Review Draft 2015-2023 Housing Element**

Dear Mayor and City Council Members:

We are writing on behalf of our clients, Familias Addams por un Mejor Futuro, Rosalina Carson, and Rosalba Cardenás (collectively, “Familias Addams”), to provide comments on the City of Fresno’s Public Review Draft 2015-2023 Housing Element (“Draft”) submitted to the California Department of Housing and Community Development (“HCD”) on January 7, 2016. As you know, Familias Addams is an unincorporated association of residents whose mission it is to struggle for improved quality of life and a better future for the residents of the neighborhood surrounding the Jane Addams Elementary School and for the Fresno community in general.

State law requires jurisdictions to adopt a valid housing element to ensure that every community plans for the housing needs of all community members in a timely and efficient manner. This letter addresses certain areas of major concern regarding the City's obligations to re-zone sites in its last planning period and the effect of that failure in the current Draft. We will provide further comprehensive comments regarding the Draft in the very near future.

**I. Required Carry-Over Analysis**

The Draft does not contain the required carry-over analysis required under Government Code Section 65584.09, which provides that jurisdictions must re-zone any remaining unmet need from the previous planning period within the first year of the new planning period. The City's 2008-2015, as extended, Housing Element (“Housing Element”) had a severe shortfall of sites identified to meet the City's Regional Housing Need Allocation (“RHNA”). To remedy that deficiency, the Housing Element includes a program to re-zone 700 acres of vacant land to allow exclusively for multi-family development “by right”, including 500 acres of land at a minimum of 20 dwelling units per acre (d/u/a) and 200 acres of land at a minimum of 38 d/u/a by June 30, 2010. The City never implemented Program 2.1.6A and never re-zoned the required 700 acres. Therefore the City did not have an adequate supply of land available and suitable for residential



development for all income groups during the 2008-2015 planning period and now is required under Section 65584.09 to re-zone that remaining need within the first year of this planning period.

The Draft asserts that the City adopted a new development code in the previous planning period and therefore is no longer required to implement Program 2.1.6A. The actions taken by the City in the last weeks of the period, however, did not result in the re-zoning of any of the required 700 acres within the last planning period (2008-2015). Draft p.5-6. First, under the best reading of the City's assertion, the sites were not rezoned for multi-family residential land use and made available for development during the last period. Second, the City's new Development Code did not in fact apply the newly identified zoning designations to any City parcels. That requires subsequent action by the City Council to adopt a zoning map that applies the zoning designation to parcels, and that did not occur during the applicable planning period.<sup>1</sup> See Report to City Council dated November 19, 2015, attached. Third, even assuming adopting a new Development Code did in fact re-zone any land, which it does not, the new Development Code did not take effect until January 2016, one month into the new planning period. Government Code Section 65588(f) unequivocally states that the new planning period begins when the new housing element is due - in this case the new planning period began December 31, 2015. Govt. Code Section 65588(f) (1). As such the City's Draft Housing Element does not comply with state law because it does not contain a program to evaluate the City's carry-over obligation despite failing to re-zone sites as required in its 2008-2015 Housing Element.

## **II. Adequacy of Sites**

### **1. Applicable Zoning**

The Draft includes an inventory of available sites that as of yet have not been zoned to permit the residential densities identified to meet the City's RHNA. Although the City may anticipate zoning these parcels, until the zoning is actually completed, many of the sites identified are not actually available at the densities stated in the Appendix B. It is therefore premature to assess whether or not the City actually has identified an adequate inventory of sites available for residential development.

### **2. Realistic Development Potential of Non-Vacant Sites**

If the City does re-zone the identified parcels the City must still engage in several levels of analysis before it can be determined whether the sites fulfill the obligations under Government Code Section 65583.1. For instance, Government Code Section 65583.2(g) requires the City to

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<sup>1</sup> "The staff recommendation is limited to the text of the Code, and does not include a new Zoning Map, which will be brought before the Council for consideration at a later date. This is due to Code text not taking effect until 30 days after adoption by the Council. The authority to adopt the new Zoning Map therefore will not be in place until 30 days after adoption. When the new Zoning Map is adopted, the Translation Table in Exhibit F will be used to apply the standards in the Code to properties based on their current zoning designation." Report to City Council dated November 19, 2015, p. 4.

analyze whether the non-vacant parcels included in its site inventory have a realistic development potential during this planning period. This required analysis is missing from the Draft.

Any sites re-zoned to meet the shortfall resulting from the City's failure to implement Program 2.1.6A must meet the requirements of Government Code section 65583.2(h) and allow by right development on the sites identified and have a minimum density that will permit at least 16 d/u/a.

### **3. Development Capacity**

The Draft calculates the realistic development capacity on most sites in the land inventory based on the minimum density allowed by the applicable zoning designation, but the land inventory also includes commercial sites which have no minimum density for residential development. pp. 3-4. The Draft states that the realistic development capacity of these sites is 75% of the allowable maximum density but does not provide any analysis to support this calculation, such as recent development patterns on these types of sites.

### **III. Compliance with Fair Housing and Civil Rights Statutes**

The Draft asserts that it will provide funding to assist in the enforcement of fair housing laws, but provides no analysis demonstrating its compliance with its obligation under state and federal civil rights laws to affirmatively further fair housing. Gov. Code §§ 12900, et seq. 65008, et seq.; In order to fulfill this obligation, the City must assess whether its planning and zoning decisions, including its selection of sites identified in its sites inventory, perpetuate racial segregation or creates housing choice for Fresno residents by zoning for multiple housing options in each area of the City.

This is especially critical in Fresno, which has among the highest rates of racially and ethnically concentrated poverty in the region. See San Joaquin Valley Fair Housing & Equity Assessment, p. 29 (Finding that approximately 20% of the City's Hispanic population, 16% of the City's Black population, and 15% of the Asian population live in neighborhoods characterized by racially and ethnically concentrated poverty, compared with 4.5% of the white population). The City's own 2035 General Plan acknowledges that growth patterns favoring higher end housing catering to upper income families in the northern part of the City has exacerbated Fresno's concentrated poverty. pp. 10:11.<sup>2</sup> The 2015-2023 Housing Element must include analysis, policies, and program actions demonstrating that the Housing Element, including its sites inventory, will reduce – and not fortify – barriers to fair housing for protected classes in Fresno.

### **IV. Compliance with Public Participation Requirements**

State law requires that each jurisdiction must make a diligent effort to achieve public participation of all economic segments of the community in developing its housing element.

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<sup>2</sup> "Growth patterns have...exacerbated the concentration of poverty [in South and West Fresno neighborhoods.] Housing in the northern part of the city caters to upper income families while affordable housing investment has occurred in more distressed neighborhoods."

Govt. Code section 65583(c)(8). Here, 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. In our supplemental letter we will further address deficiencies in the City's public participation process and provide recommendations to help the City make the public process meaningful as the law intends.

\* \* \* \* \*

We hope that our input will assist the City's efforts to develop a 2015-2023 Housing Element that expands housing opportunity for all resident in compliance with applicable state and federal law. As indicated in this letter above, we will be submitting additional detailed comments, including input regarding the Draft Housing Element's programs and fair housing analysis in a subsequent letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Werner".

Ashley Werner, Esq.  
Leadership Counsel for Justice and Accountability

cc: Doug Sloan, City Attorney  
Paul McDougall, California Department of Housing & Community Development

## Sophia Pagoulatos

---

**From:** Shannon Mulhall  
**Sent:** Tuesday, February 16, 2016 3:38 PM  
**To:** Sophia Pagoulatos  
**Subject:** Housing Element Comments

Sophia,

I'm following up with an informal list of some of the comments that were brought up during the DAC meeting, and integrating a few of my own comments. I'll send you the minutes once I complete them. I'm assuming that it will be useful if I add more detail discussion points in those minutes rather than just "presented."

Respectful language is one of the hardest bits to stay in front of – I find the same issues when I'm updating my own policy documents. Oh the joys of dynamic language!

- Person-First Language
  - "People/Individuals/Persons with disabilities" (People or individuals can be used interchangeably) rather than disabled people
  - "Households *that included* individuals with disabilities" rather than "households *supporting* disabled persons" (a subtle distinction, yet the former does not embed the assumption that a person with a disability is unable to support themselves)
  - "Older adults" or "seniors/senior citizens" rather than "elderly"
  - "Intellectual or Developmental Disability" or "persons with developmental disabilities" rather than "Mental Retardation" "developmentally disabled persons"
    - page 2-13 has an outdated citation of Section 4513 – check for updated code that removes mental retardation
- Developmental Disabilities section – connect with Central Valley Regional Center (CVRC) directly for additional comments
  - Developmental Centers. Currently there are only three and they are in the process of closing. This means no new CVRC going to the centers and more people coming from the centers to be housed in the community.
  - Numbers and stats for local and statewide number of individual with disabilities – CVRC can provide current and direct data
  - CVRC is in 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
  - Residential care facilities (page 4-20) – number of allowable beds/individuals served has reduced from 6 to 4. Check with CVRC on the specifics for Limited versus General care facilities.
- Resources on page 2-15
  - CIL Fresno changed its name to Resources for Independence, Central Valley (RICV)
  - Add Deaf and Hard of Hearing Service Center, Inc. (DHHSC) and Exceptional Parents Unlimited (EPU)
- Questions were posed as to the requirements for how to build (inclusionary zoning) and the annual reporting. There was not an overt suggestion that inclusionary zoning be considered by the city, however some might say that it was insinuated
- Program 1 – How exactly does this program encourage development of housing for persons with disabilities? Suggested that local disability consultants be utilized more frequently on the developer teams to advise on needs for people with disabilities and older adults
- Program 5 – 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
- Program 10 – suggested development incentives for universal design and accessible housing

My own notes:

- Let's take a look at updating Program 15. 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).
- Should Objective H-5 include "disability" in the heading?
- 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?
- I'm noticing various programs for senior housing. I wonder if it might be effective for the long term to 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).
- Along the same lines as above, 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)

I hope this isn't overwhelming! Let me know if you have any questions.

*Shannon M. Mulhall, NIC, ACTCP  
Certified Americans with Disabilities Act Coordinator  
Council Liaison to Public Works Department  
City of Fresno  
2600 Fresno Street, Rm 4011  
Fresno, CA 93721  
559-621-8716*

*All emails are saved on a public server and may be eligible for public disclosure, except for protected and privileged communication.*



AZIPC	0-14	15-22	23-54	55-64	65+
93650	14	8	8	2	0
93701	42	12	38	2	0
93702	177	59	142	10	7
93703	120	58	80	9	4
93704	84	22	53	11	4
93705	144	59	109	11	1
93706	106	41	88	3	5
93710	84	55	104	20	11
93711	78	16	72	17	7
93721	12	1	20	2	6
93722	309	133	242	36	17
93724	1	0	0	0	0
93725	81	39	61	8	4
93726	132	43	162	13	7
93727	288	87	204	24	17
93728	51	15	30	4	5
93792	1	0	0	0	0
	1724	648	1413	172	95

93724 No clients

93729 No Clients



A Tides Center Project

February 26, 2016

Mayor Ashley Swearengin  
Fresno City Council  
Fresno City Hall  
2600 Fresno Street, Rm 2097  
Fresno, CA 93721

*Sent via Email*

**Re: City of Fresno Public Review Draft 2015-2023 Housing Element  
Supplemental Comments Submitted on Behalf of *Familias Addams por un  
Mejor Futuro***

Dear Mayor and City Council Members:

We are writing on behalf of our clients, Familias Addams por un Mejor Futuro, Rosalina Carson, and Rosalba Cardenás (collectively, “Familias Addams”), to provide comments on the City of Fresno’s (“City”) Public Review Draft 2015-2023 Housing Element (“Draft”) submitted to the California Department of Housing and Community Development (“HCD”) on January 7, 2016. These comments supplement the comments we previously submitted on behalf of Familias Addams with respect to the Draft on February 4, 2016 and will assist the City in developing a Final Housing Element that expands housing opportunities for all Fresno residents in accordance with the aims and requirements of State Housing Element Law.

Familias Addams is comprised of residents of the Jane Addams neighborhood in the City and/or County of Fresno who are impacted by the lack of affordable housing in Fresno. Leadership Counsel for Justice and Accountability works collaboratively with Familias Addams as well as other residents from other low-income neighborhoods in Southeast and Southwest Fresno to identify and seek solutions to their housing and community development needs. We are thus uniquely positioned to provide comments to the City on its Draft Housing element.

**1. Adequacy of Sites Identified in the Sites Inventory**

The housing element shall contain an “inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites.” Gov. Code § 65583(a)(3).

February 26, 2016

In addition to the comments provided in our February 5th letter, we provide the comments below regarding the failure of the sites inventory and associated analysis included in the Draft to satisfy the standard set by Government Code Section 65583(a)(3).

**a. Failure to Demonstrate Feasibility of Development of Sites**

HCD's Building Blocks states that the identification of the size of parcels included in the inventory is "important as parcel size can be a key factor in determining development viability, capacity, and affordability." It further states that, "The element should include an analysis demonstrating that the estimate of the number of units projected on small sites, is realistic or feasible. The analysis should consider development trends on small sites as well as policies or incentives to facilitate such development." "To utilize small sites to accommodate the jurisdiction's share of the regional housing need for lower-income households, the element must consider the impact of constraints associated with small lots development on the ability of a developer to produce housing affordable to lower-income households."

Here, the Draft's Sites Inventory contained in Table B-1 contains hundreds of small sites, many less than one acre in size, which it indicates are suitable for lower-income housing with no analysis or explanation demonstrating the feasibility of such development. The Final Housing Element must include an analysis demonstrating that lower-income housing development is in fact feasible on the small sites contained in the inventory, including if appropriate through the incorporation of a parcel assemblage program. If the City cannot so demonstrate, the City must remove those sites from the inventory.

The City must also assess the feasibility of housing development on large sites identified in the Draft. While the Draft identifies several parcels that are 20 acres or more, there are no corresponding programs to facilitate site development, including, but not limited to the programs to secure adequate infrastructure and services at the sites and ensuring access to amenities and transit consistent with affordable housing funding programs. Similarly, the City must analyze the availability of funding programs for all site development but in particular large developments for which 9% tax credits may not be available.

In summary, the City must assess the feasibility of developing sites identified in the Housing Element holistically, in the context of governmental, environmental, infrastructure related, and financial constraints. The Draft's analysis is incomplete.

**b. Failure to Account for Substantial Residential Downzoning in 2008  
Housing Element Planning Period**

The Draft includes no reference to or analysis of the substantial rezoning of residential-zoned properties to lower density residential and non-residential zone districts throughout the 2008 Housing Element Planning Period – including sites contained in the 2008 Housing Element Sites Inventory -- in order to facilitate approval of single-family residential subdivision and commercial development projects. The Final Housing Element must identify these down-zonings and their impact on the availability of the sites contained in the City's 2008 Housing Element Sites Inventory for development at the specified densities. The City must incorporate the reduced densities into a carry-over analysis in the Final Housing Element which calculates the acreage of sites the City must make available at appropriate densities following adoption of the 2015 Housing Element as a result of the City's failure to make those sites available during the 2008 Housing Element planning period. This increased carry-over – due to the downzoning of sites – must be added to the City's total mandated carry-over sites due to its failure to rezone 700 acres as discussed in our correspondence of February 4, 2016.

**c. Failure to Demonstrate Compliance with Fair Housing and Civil  
Rights Laws With Respect to Site Location**

Fair Housing and Civil Rights laws prohibit the City from taking actions that result in or contribute to the concentration of housing affordable to low-income populations in areas characterized by racially and/or ethnically concentrated poverty (RCAP/ECAP areas) or the imposition of a disproportionate adverse impact on protected classes. Gov. Code §§ 11135, 12900, et seq. 65008, et seq; 42 U.S.C. §§ 2000d, 3601, et seq. As discussed in our February 4th Letter, the Draft provides no analysis demonstrating distribution of sites by income category in a manner that complies with fair housing and civil rights laws or even any information that would allow the public to assess the City's compliance in this regard. The Draft's Sites Inventory Map does not identify the density or income category associated with the sites included therein. 3-11. The documented existence and persistence of RCAP/ECAP neighborhoods in Fresno, predominately located in Southeast, Southwest, and Central Fresno, reinforces the City's duty to provide information and analysis demonstrating its compliance with fair housing and civil rights laws in the selection of sites for affordable housing.

In addition, as we have advised the City in previous written and oral comments, industrial zoned sites in Fresno are disproportionately concentrated in and around low-income neighborhoods of color in South Fresno, including but not limited to West Fresno, Calwa, the Jane Addams Elementary School neighborhood, and areas in Southeast Fresno. The

February 26, 2016

siting of industrial sites in residential communities results in negative impacts on neighborhood quality and resident health and, accordingly, results in disproportionate impacts on protected classes. Negative impacts include but are not limited to the release of toxic air contaminants, diesel emissions, pedestrian and cyclist safety hazards, and sound associated with truck traffic generated by industrial facilities and warehouses, noxious odors, aesthetic incongruities, and the reduction in available land for housing and needed amenities such as parks, open space, grocery stores, and retail outlets.

The City should include a program in the Final Housing Element 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 for all economic segments of the population as well as other zone districts that create opportunity to allow development of needed services and amenities.

## **2. The City Has Not Satisfied its Duty to Make a Diligent Effort to Achieve the Participation of All Economic Segments of the Community**

Government Code § 65583(c)(8) requires local governments to make a diligent efforts to achieve public participation of all economic segments of the community in the development of the housing element and to describe these efforts in the housing element. The California Department of Housing and Community Development (HCD)'s "Building Blocks for Effective Housing Elements"<sup>1</sup> ("Building Blocks") elaborates on this requirement. As explained below, the City has yet to satisfy the public participation requirement established by Government Code Section 65583.

### **a. The City Failed to Make a Diligent Effort to Achieve Participation of Low-Income Residents and Other Stakeholders**

As demonstrated in "Table 2: Workshop Summary" of the Draft, few individuals participated in the housing element workshops conducted by the City for this housing element update. The minimal public participation in the City's 5th Cycle Housing Element Update to date is consistent with a pattern of limited civic engagement in significant land use and housing planning and decision-making processes in the City, including those associated with the Development Code Update (adopted in December 2015), 2015-2019 Consolidated Plan Update, and the pending update of the City's Analysis of Impediments to Fair Housing, and evidences a need for serious rethinking and change in approach by the City with respect to its public outreach strategy in order to effectively reach and engage all economic segments of the population.

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<sup>1</sup> Available online at <http://www.hcd.ca.gov/housing-policy-development/housing-element/>  
764 P Street, Suite 012, Fresno, California 93721  
Telephone: (559) 369-2790

February 26, 2016

We applaud staff for ensuring translation of workshop flyers into Spanish, Hmong, and English and the presence of on-site translation at the workshops and for providing flyers to schools that served as workshop sites for distribution to students. These steps alone, however, do not satisfy the City's obligation to make a "diligent effort" to obtain public participation of all economic segments of the population as required by Government Code Section 65583(c)(8). Advertisements for the workshops placed by the City in the Fresno Bee, usually in small font in the middle or end of the newspaper, are unlikely to reach low-income residents, non-English speakers, and other populations most impacted by housing and quality of life problems in Fresno.

As advised in Building Blocks, the City should use culturally-sensitive and language-appropriate communication tools to reach its target audience. Such approaches may include visiting neighborhoods and participating in local events; use of direct mail, radio spots, and local print and electronic media such as neighborhood newsletters to advertise opportunities for participation. For example, the City could include information about the housing element update and how to participate in monthly utility bills mailed to customers. Free advertising for public workshops and community events is also often available through the Fresno Bee and local foreign language media outlets, including Radio Bilingue, Univision, Hmong TV, and others. In addition, the City can and should reach out directly to impacted and special needs populations to obtain input, including for example residents of Fresno Housing Authority developments, through in-person meetings and stakeholder interviews.

Most importantly, we believe that the lack of resident participation in this process highlights the need for City staff and elected officials to develop and sustain long-term relationships with community leaders throughout Fresno and from Fresno's low-income neighborhoods of color and immigrant population in particular who can convey information about City planning and decision-making processes and public participation opportunities to their networks. These community leaders are engaged in numerous volunteer efforts and community forums where residents share information about opportunities to address individual and community concerns such as those addressed by the housing element. Additionally, we recommend that the City of Fresno partner with local Community-Based Organizations (CBO's) which work directly with residents from disadvantaged communities to develop an inclusive and equitable outreaching strategy for community engagement to reach diverse income groups and residents with limited English language capacity.

We would be happy to meet with you in person to discuss these recommendations in greater detail in order to identify specific steps the City can take to satisfy its obligations under Code Section 65583(c)(8) for the 5th Cycle Housing Element Update and to lay the foundation for effective community engagement going forward.

**b. The Draft Fails to Incorporate Public Comments**

Building Blocks states that, as part of the requisite analysis pursuant to Government Code Section 65583, the housing element must “[d]escribe who was invited to participate, which groups actually participated, general comments received and how comments were incorporated into the housing element.”

The Draft states that approximately 140 comments and questions were received at the workshops, summarizes those comments into five major concerns, and identifies three solutions offered by workshop participants. The Draft does not indicate whether the five major concerns identified encapsulate the content of all 140 comments or whether the comments and concerns raised by workshop participants address additional topics. Significantly, the Draft does not indicate whether or how any of the comments, concerns, or solutions raised by participants were incorporated into the Draft.

The Final Housing Element must meaningfully incorporate public comments received as called for by the Building Blocks, including by adopting policies and programs as appropriate to address concerns and solutions identified by the public.

**c. The Final Housing Element Must Commit to Actions that the City will Take to Expand Stakeholder Participation in Implementation**

Building Blocks states that the Housing Element must “[d]escribe any ongoing efforts to engage the public and stakeholders in the implementation of the housing element.”

Building Blocks states that jurisdictions should invite a wide array of groups to participate in the housing element implementation process and recommends that jurisdictions establish an ongoing housing element update and implementation committee to oversee the update and implementation.

The Draft fails to describe any actions the City will take to engage residents and stakeholders in implementation of the Housing Element. In fact, the Draft mentions that the City eliminated its 10 x 10 Affordable Housing Committee in 2009 but does not explain why or describe any efforts the City has taken or will take to ensure public participation in housing element implementation in its absence.

As discussed in Section 2(a) above, the City must enhance its efforts going forward to obtain and incorporate public input in land use and housing planning and decision-making processes, including housing element implementation. To that end, we recommend that the City establish a committee charged with overseeing and providing recommendations to the City regarding the timely implementation of crucial housing element programs as well as implementation and development of other City policies and practices relating to affordable housing and quality of life in existing neighborhoods. The



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committee should include representation by low-income residents, non-English speakers, residents from block-grant eligible neighborhoods, special needs populations and other protected classes. The Committee should also include representation by local affordable housing and market-rate developers, affordable housing advocates, community development specialists, finance professionals and other stakeholders.

Leadership Counsel proposed a similar concept during the General Plan Update process (an “Infill Opportunity Working Group”) which the Mayor indicated she intended to implement but which to our knowledge has not materialized. The City must not delay further its work to lay the foundation for inclusive and effective implementation and development of City housing and land use policy.

### **3. Failure to Adequately Analyze and Respond to Effectiveness of Past Performance**

As explained in HCD’s Building Blocks, Government Code Section 65588’s requirement that jurisdictions review their progress in implementing their housing element is “an important feature of the housing element update” which, if completed thoroughly, “facilitates a comprehensive update and ensures the element can be effectively implemented in the next planning period.” The Draft fails to adequately analyze the City’s past performance in implementing the programs contained in its 2008 Housing Element and respond appropriately through the re-incorporation, modification or deletion of programs as mandated by the Government Code and reinforced in Building Blocks.

Specifically, Table 5-1: Previous Program Accomplishments (2008-2013 Housing Element), which constitutes the Draft’s assessment of the City’s past performance, omits reference to or analysis of the City’s implementation of significant components of various programs contained in the 2008 Housing Element. For its assessment of several programs, some of which require action by the City on an annual basis, the Draft references its adoption of an updated Development Code in December 2015 but provides no information about any action by the City to implement the program during the plan period between 2008 and December 2015. The Draft’s assessment also indicates that the City failed entirely to implement aspects of various programs and/or fell dramatically short of established targets yet provides no meaningful analysis of the reasons for the City’s failure. The Draft repeatedly references the dissolution of RDA without further analysis for its assessment of its implementation of programs which the City failed to implement in full or in part, despite the fact that dissolution occurred only in 2012, four years into the planning period, and thus cannot explain the City’s failure to implement its programs. The Final Housing Element must include a revised assessment of past performance that corrects these deficiencies.



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A few examples of the Draft's inadequate analysis and response include the following:

- Program 1.1.2 - One Stop Processing. Program 1.1.2 commits the City to expediting processing of affordable housing projects. The Draft's assessment of the City's implementation of the program describes the Business-Friendly Fresno but does not actually explain what the City has done - or not done - to expedite processing of affordable housing projects specifically, the effectiveness of those efforts, and whether the City should modify its efforts going forward.
- Program 1.1.4 - Institutional Barriers. Program 1.1.4 requires the City to "identify land use policies, ordinances and procedures, and other potential local, state, and federal regulations" that may bar the development and maintenance of affordable housing and development at maximum densities. The City's assessment focuses entirely on the City's 2015 adoption of an updated Development Code but does not any specific identify policies or procedures that limit affordable housing in Fresno, other than maximum densities, that were addressed through the Development Code Update or describe any efforts by the City to identify state or federal regulations.
- Program 1.1.7 - Fresno Green. The Draft's assessment of the City's performance in implementing Program 1.1.7 does not address the City's efforts or achievements with respect to the specific components of the Fresno Green Strategy which are incorporated into the program, including the requirement that 20% of City-sponsored affordable housing projects shall meet City-adopted green standards.
- Program 2.1.1 - Land Demand. Program 2.1.1 states that the "City will annually monitor the supply of vacant zoned and residential planned land" to ensure a continual supply of planned residential land. The Draft's assessment of this program references the City's Development Code Update, adopted in December 2015. The assessment does not identify any actions taken by the City to implement the program during the planning period prior to 2015. The assessment also does not indicate, as it must, that the standards adopted in the Development Code Update do nothing to increase residential development capacity in the City without adoption of a new city-wide zoning map to apply the Development Code standards to specific parcels, an action which did not occur during the planning period.
- Program 2.1.4 - Inner City Residential Development. Program 2.1.4 states that the City would continue to implement the Inner City Fee Program to create approximately 700 housing units. The assessment indicates that only 240 units

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were approved between 2008 and 2014 but provides no explanation for the City's failure to achieve the target set by Program 2.1.4 by 460 housing units.

- Program 2.1.5 - Other Infill Housing. The program provides that the City and RDA shall acquire sites to accommodate the construction of up to 300 units for low-income affordable housing. The assessment indicates that the RDA completed rehabilitation and sale of 13 affordable units but does not indicate that any units were constructed pursuant to the program or explain why the City did not achieve its goal of the construction of 300 units other than to note that the RDA was dissolved in 2012, four years into the planning period.
- Program 2.1.7 - Multi-family Land Supply. This program requires that the City annually review applicable state legislation to ensure consistency of its plans and zoning ordinance and that wherever possible, the City shall act to increase housing yield per acre. The assessment of the City's implementation of this program references the City's adoption of the 2015 Development Code Update but does not describe any efforts by the City to annually review applicable state legislation to ensure consistency with local plans and regulations. Nor does any actions by the City to increase housing yield per acre from 2008 to adoption of the Development Code in December 2015. During the planning period, the City in fact approved rezoning of numerous parcels to lower residential densities at the request of developers, a fact which should be included in the City's assessment of its progress in implementing Program 2.1.7.
- Programs 2.1.13, 2.1.15, & 2.1.16 - Programs 2.1.14, 2.1.15, and 2.1.16 all commit the City to using available funds in order to produce hundreds of transitional, large family, and low-income senior housing units. The assessments of the City's performance of Programs 2.1.15 and 2.1.15 do not indicate whether any units were constructed pursuant to the programs, while the assessment pertaining to Program 2.1.16 indicates that six senior housing developments. The Draft does not provide any explanation for the City's failure to construct the affordable housing units, other than to reference the loss of redevelopment funding in 2012. The Final Housing Element must examine why the City failed to achieve targets for affordable housing construction set by Programs 2.1.13, 2.1.15, and 2.1.16, despite the continued existence of the RDA from 2008 to 2012. The Final Housing Element should also consider whether it is desirable to maintain the programs in a modified format in light of other funding sources for affordable housing now available.
- Program 4.1.2 - Preventing and Alleviating Foreclosure. The Draft's description of Program 4.1.2 omits information contained in that program regarding the

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substantive changes that the update to the City's Vacant Building Ordinance would include, including reduction in time between citation issuance and increased fee scales and citations. The assessment of the City's implementation of this program states that the City adopted two ordinances related to foreclosed properties but does not describe whether those ordinances contain the content promised by Program 4.1.2 or whether further policy change may be merited to address ongoing issues associated with vacant housing.

The Final Housing Element must include improved analysis of past performance which contains a thorough review of actions taken by the City to implement the programs in its 2008 Housing Element, the City's successes and failures in accomplishing the goals established by the programs, and incorporation, deletion or modification of policies and programs into the Final Housing that respond to this analysis.

#### **4. The Draft Fails to Adopt Satisfactory Program Actions**

Government Code Section 65583(c) provides that each housing element shall contain:

"A program which sets forth a schedule of actions during the planning period, each with a timeline for implementation,...such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element."

Building Blocks further explains that:

"Programs are the specific action steps the locality will take to implement its policies and achieve goals and objectives. Programs must include a specific time frame for implementation, identify the agencies or officials responsible for implementation and describe the jurisdiction's specific role in implementation."  
(underline added)

Several programs contained in the Draft lack sufficient clarity with respect to the specific action steps which the City will take which will result in a beneficial impact within the planning period. The Draft further fails to identify a *specific* time frame for implementation of various programs but instead commits ambiguously to "ongoing implementation". See e.g., Programs 1-4, 8, 9, 12.

The following programs must be modified in order to satisfy Government Code Section 65583(c):

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- Program 5 - Special Needs Housing. The “Timeframe/Objective” identified for the program reads, “500 units during the planning period (62.5 units per year)”. It is unclear whether the statement constitutes a commitment to the construction of 500 units or something else. The Final Housing Element must specify in clear terms the goal established by Program 5.
- Program 8 - Fresno Green. The Program states that the “City will also monitor grant funds for applicable housing related energy-efficient items”. In order to achieve beneficial results in the planning period, the program must commit the City not only to monitoring grant funds but also pursuing them in accordance with quantifiable objectives. In addition, the Final Housing Element must clarify whether Program 8 includes a commitment to implementing the entire Fresno Green strategy or only the specific development incentives listed under the program as described in the Draft.
- Program 9 - Expedited Processing. Program 9 states, “As needed, the City will assess the incentives needed to facilitate the development of affordable housing.” The Program provides no information about how the City will determine whether such assessment is needed. The Final Housing Element must include a clear timeline or trigger for the assessment of incentives needed to facilitate affordable housing development and should ensure the participation of diverse stakeholders in the assessment process, including but not limited to City staff, low-income and special needs residents, affordable housing advocates, and developers.
- Program 10 - Development Incentives. Program 10 states, “As funding is available, the city will reduce, or subsidize development and impact fees for affordable housing.” The Program does not identify how the City will determine whether “funding is available” to implement this component of Program 10. Implemented city-wide, such a program could support development of affordable housing in existing neighborhoods outside of Downtown which lack affordable housing and in growth areas contemplated for development under the City’s General Plan. The Final Housing Element must establish a timeline with specific actions identifying when and how the City will assess the availability of funding to reduce costs associated with the development of affordable housing and appropriately allocate available funding for that purpose.
- Program 11 - Agricultural Employees (Farmworker) Housing. The “Timeframe/Objective” included for this program commits the City to “Review Development Code by January 2017”. The Timeframe/Objective must specify that the City will also revise the Development Code by January 2017 in order to ensure compliance with the California Employee Housing Act and other laws pertaining to farmworker housing.
- Program 14 - Comprehensive Code Enforcement. The Timeframe/Objective included for this program indicates that the City will “Complete 8,000 inspections annually and develop Task Force recommendations by the end of 2016”. The

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program must commit the City not only to inspection of units but also the resolution of cases identified through the inspection process, including through enforcement actions against landlords if necessary. Inspection without further action does nothing to ensure the resolution of code violations identified or associated health and safety issues.

The Final Housing Element must include revised program actions that identify “specific action steps” that the City will take and the “specific timeframe” for the actions such that the program will achieve beneficial results within the planning period. Gov. Code § 65583(c); Building Blocks.

**5. Failure to Adequately Identify or Mitigate Drought-Related Barriers to Housing Opportunity**

The Draft fails to consider the impact of the ongoing drought, climate change, and changing paradigms for water availability and management practices on housing opportunity in Fresno. The Final Housing Element must include analysis, policies, and programs that address current and future water scarcity, diminished capacity, increased demand and water costs, and changing mandates, including the Sustainable Groundwater Management Act, as they pertain to the City’s ability to satisfy the need for affordable housing for all economic segments of the community in Fresno.

The Final Housing Element should include a program committing the City to review and revise City regulations, including the 2015 Development Code, to ensure appropriate management of the City’s water resources to ensure that housing needs are met for all income groups. While the Development Code requires applicants for development projects consisting of at least 500 subdivision units to demonstrate the availability of adequate water supplies, the Code does nothing to ensure the availability of sufficient water for subdivision projects consisting of fewer units (which constitute the majority of subdivision projects) or the availability of water for multifamily and affordable housing units.

**6. Failure to Adequately Identify or Adopt Programs to Address Habitability Barriers to Housing Opportunity**

Every jurisdiction’s housing element must include programs which will “conserve and improve the condition of the existing affordable housing stock.” Gov. Code § 65583(c)(4). As explained further in Building Blocks:

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“The existing affordable housing stock is a valuable resource and the element must include programs to conserve and improve the existing affordable housing stock...”

The Draft fails to contain adequate programs that will serve to “conserve and improve” the condition of existing affordable housing in Fresno, including extensive substandard housing conditions that plague residents of low-income rental housing. Program 14 commits the City only to completing “inspections” without any promise of enforcement or resolution of code violations and to the development of recommendations by a Code Enforcement Task Force without any promise of adoption of those recommendations. The Final Housing Element must commit the City to resolving substandard housing conditions through code enforcement action and other means and to adopt and implement policies and procedures in order to “conserve and improve” the City’s affordable housing stock.

In addition, in order to ensure the ability of the City’s Code Enforcement Task Force in identifying appropriate solutions to substandard property conditions in the City’s rental housing stock, the Task Force must include current and/or past rental housing tenants impacted by such conditions. The City must provide the public with notice of and the opportunity to participate in Code Enforcement Task Force meetings, so that Task Force members may hear and discuss public input at its meetings and to ensure transparency and accountability in the process. As a way to ensure that residents from low-income communities and communities of color are designated seats in the Task Force, the City must work with local CBO’s to identify resident leaders interested in serving and provide the technical support and/or translation services for non-English speakers to meaningfully participate in the decision-making processes.

The Draft should also include a program to revise the City’s municipal code to allow the public to enforce habitability provisions. This would expand available opportunities and resources to ensure that landlords comply with law adopted to ensure healthy and safe living conditions for tenants. Revisions to the City municipal code should include the creation of an effective outreach program to better inform tenants about the process of anonymously reporting landlord and management violations of habitability laws. In our experience, non-English residents from low-income communities and communities of color frequently do not report unhealthy living conditions and landlord abuses, because they are not aware of the process to do so or the City has failed to ensure that previous complaints submitted were addressed, including through enforcement action. Undocumented residents face the fear of both retaliatory eviction and even deportation, and therefore, endure ongoing and un-remediated abuses.

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Like Draft Program 14, Draft Housing Element Program 17 does not include any commitment to specific actions by the City that will result in a beneficial impact in the planning period. Rather, 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 of Fresno. The Final Housing Element must modify this program to establish a date by which the City will make a formal determination as to whether it will participate in the program. The City must also commit to proactive code enforcement as opposed to a complaint based system in order to ensure the needs of residents are met for safe and healthy housing.

**7. Inadequate Analysis and Mitigation of Special Needs Populations Housing Needs**

The Draft fails to adequately analyze and mitigate the housing needs of the special needs populations identified under Government Code Section 65583(a)(7). Government Code 65583(a)(7) requires that housing elements include an analysis of special housing needs in the jurisdiction, including but not limited to those of the elderly, persons with disabilities, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter.

Building Blocks states that the analysis of each special needs group should include the quantification of the number of persons or households in the special needs group; a quantitative and qualitative description of the need; and identification of potential program or policies options and resources to address the need. Building Blocks further specifies additional recommended analysis for each special needs population.

**a. The Draft Does Not Adequately Identify and Respond to the Housing Needs of Large Households**

The Draft indicates that the share of large households (defined as households with five or more members) in the City’s population constitutes 20% of total households in Fresno and is increasing. 2-17. The Draft Housing Element identifies overcrowding and substandard housing conditions as potential problems faced by large households, though the Draft contains no data or specific information about the actual extent to which these issues impact large households in Fresno.

The Draft’s analysis of resources available to address the needs of large households states that the City “encourages the development of subsidized and private multi-family rental units citywide that incorporate services and facilities to assist large families...” 2-17. The Draft does not provide any information about specific activities the City performs to “encourage” the development of such housing. In addition, the Draft does not indicate



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that the City currently does or could undertake any actions to facilitate the development of units sufficient bedrooms to accommodate large households. The Final Housing Element must include supplemental analysis to address these deficiencies.

Draft Chapter 6, “Housing Plan”, includes one program, Program 5, which addresses the housing needs of special needs populations, including large households, in Fresno. That program states only that the City and Housing Authority will investigate and apply for funding to assist in the production of large family units. The Draft contains no commitment by the City to apply for funds for or ensure production of any specific number of units suitable for large families in particular and further contains no program actions for the identification and mitigation of barriers to housing opportunity.

The Draft’s assessment of past performance with respect to 2008 Housing Element Program 2.1.15, which established a goal of application of funds to assist in the development of 400 large family units, indicates that *no* large family units were in fact constructed as a result of implementation of the program. The City must justify the feasibility of effective implementation of an equivalent program in the 2015-2023 Housing Element or modify the program appropriately to ensure that it will result in a beneficial impact in the planning period.

#### **b. The Draft Fails to Respond to the Needs of Female-Headed Households**

The Draft states that female-headed households make up approximately 19.2% of all households in Fresno and face significant challenges in meeting the daily needs of their families, including paying for basic living expenses such as safe and affordable housing, food, and medicine as well as securing child care, medical insurance, and well-paying jobs. Despite this recognition, the Draft contains no programs designed to address the particular needs of female-headed households. The Final Housing Element must incorporate additional analysis of resource and program options available and adopt programs to assist this segment of the population in obtaining safe and affordable housing and a suitable living environment.

#### **c. Failure to Provide Housing Assistance Opportunities for Undocumented Families**

The Draft fails to consider the unique housing needs of undocumented residents, including obstacles to accessing financing for housing and subsidized housing opportunities. The Final Housing Element must include programs and policies to address these unique needs including, but not limited to developing partnerships with small, immigrant-friendly community based-credit union banks that offer low-interest mortgage loans and down payment assistant programs to undocumented residents.



**d. Failure of Draft to Identify or Respond to Linguistic, Cultural, and Residency Status Barriers to Affordable Housing**

Low-income households in Fresno are disproportionately comprised of Limited English Proficient (“LEP”) and Non-English Language speakers, immigrants and refugees, and undocumented residents compared to the population as whole. These households face special barriers to the attainment of safe and affordable housing which the Draft does not identify or respond to through its policies and programs.

In particular, LEP speakers may face barriers to learning about and accessing opportunities for housing assistance offered by the City, the Housing Authority, or other entities as well as their rights to safe and healthy housing under local and state laws. They also face barriers to participating in public processes for the development of policies and programs impacting housing opportunity due to absent or inadequate translation. Immigrants and refugees often face barriers to accessing opportunities and assistance due to lack of contact between themselves and City staff and decision-makers and a corresponding lack of information about available resources. In addition, undocumented residents are ineligible for most housing assistance programs offered by the City and Housing Authority, though they suffer from various housing issues associated with their low-income, LEP, and farmworker status and membership in large households. LEP speakers, immigrants, and undocumented residents all face challenges to access to affordable credit which drastically limits their opportunities to purchase and own safe and affordable housing and results in their reliance on predatory loan terms as well as risky cash payment.

The Final Housing Element must examine and respond to the housing issues impacting low-income residents and special needs populations in Fresno on the basis of language, country of origin, and immigration status.

**8. Failure to Examine or Address the Housing Needs of Residents of Mobile Homes**

The Draft contains no information, analysis, policy or program actions addressing the various housing issues associated with residency in a mobile home in Fresno.

Residents of mobile homes in Fresno are often subject to extremely high utilities charges in the hundreds of dollars per month by mobile home park owners. These charges in addition to the monthly cost of renting a space in a mobile home park often result in mobile home owners paying in excess of 50% of their income on housing costs. Many residents of mobile homes own their mobile homes and would like opportunities to

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purchase a space in the mobile home park or elsewhere to avoid paying perpetual rental charges. Many residents of mobile home parks in Fresno are low, very-low, and extremely-low income residents and members of special needs populations (including farmworkers) and protected classes whose particular housing problems must be thoroughly analyzed and address in the Final Housing Element.

The Final Housing Element must include information regarding barriers to the attainment of safe and affordable housing facing residents of mobile homes in Fresno, existing resources and opportunities to address those needs, and program actions to mitigate unmet needs.

**9. The City Must Evaluate Barriers to Affordable Housing and Fair Housing Associated with the 2015 Development Code**

The City relies on its December 2015 adoption of an updated Development Code as among the only actions taken by the City to implement various programs contained in the City's 2008 Housing Element to further affordable housing opportunities. Given the City's reliance on the Development Code Update as a mechanism to expand affordable housing opportunity in Fresno, the Final Housing Element should include a program to comprehensively evaluate barriers to housing opportunity, including to the maintenance and preservation of housing affordable to low-income populations in neighborhoods throughout the City, associated with the Development Code Update. This analysis would address Article 15-2201(D) in the Code, providing that:

“Nothing in this Article shall be construed as a provision for inclusionary zoning where an applicant is required to provide housing affordable to moderate, low, and very low income households as a condition of approval for a residential development. Furthermore, the Council shall not adopt a provision for inclusionary zoning, as described above, unless and until the Fresno General Plan adopted in December 2014 is updated and superseded by a new General Plan.”

The analysis must also address loopholes in provisions calling for the inclusion of multi-family housing in growth areas in the City. These loopholes, if allowed to remain, promise to ensure the repetition of exclusionary growth patterns favoring single-family housing development to the exclusion of other types of housing, including but not limited to townhomes, duplexes, fourplexes, and multi-family housing.

These provisions and others in the Development Code impair the City's ability to ensure it can achieve its RHNA and maintain an adequate supply of residential land to meet the need for affordable housing for all economic segments of the population in Fresno and

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therefore must be appropriately addressed in the housing element through policies and programs.

#### **10. Failure to Affirmatively Further Fair Housing**

Government Code Section 65583(c)(5) requires that local governments commit to “[p]romote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.” As explained above in Section 1(b), local governments are bound to comply with civil rights and fair housing laws requiring them to affirmatively further fair housing opportunities in their development and implementation of their housing elements as well as other land use policies, programs, and actions. 42 U.S.C. § 2000d; 42 U.S.C. § 3601, et seq.; 24 C.F.R. § 91.225(a)(1), 91.325, 570.303, 570.304(a); Cal. Gov. Code §§ 11135.

HUD defines “affirmatively furthering fair housing” (“AFFH”) as:

“...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. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and technically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant’s activities and programs relating to housing and urban development.”<sup>2</sup> (underline added)

The Draft fails to analyze or adopt programs to address barriers to fair housing in accordance with fair housing and civil rights laws and regulations, including documented patterns of racially and ethnically concentrated poverty, poor health outcomes, and disparities in access to opportunity based on geographic location, race, and income in Fresno.<sup>3</sup> The Draft also fails to incorporate information or policies or programs contained in the San Joaquin Valley Fair Housing and Equity Assessment (FHEA), which

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<sup>2</sup> See HUD’s Final Affirmatively Furthering Fair Housing rule, available online at [http://www.huduser.org/portal/sites/default/files/pdf/AFFH\\_Final\\_Rule.pdf](http://www.huduser.org/portal/sites/default/files/pdf/AFFH_Final_Rule.pdf)

<sup>3</sup> We have previously provided information to the City regarding these disparities through written and oral comments on various occasions, including but not limited to in comments attached to Petitioner’s complaint in *Familias Addams por un Mejor Futuro v. City of Fresno*.

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HCD encourages local governments in the Central Valley to use in the preparation of their housing elements.<sup>4</sup>

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 broadly for residents regardless of protected status. The City is currently updating its 1996 Analysis of Impediments to Fair Housing; the analysis, findings, and program recommendations from the update should be incorporated into the Final Housing Element.

Policies and programs to this end that the City should consider incorporating into the Final Housing Element include those set forth in the FHEA as well as other measures to AFFH applicable to Fresno. Key programs that the Final Housing Element should consider include but are not limited to (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; (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, (3) the creation of a local or regional source of funding for affordable housing through mechanisms such as a commercial linkage fee, (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 (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.

#### **11. Failure to Complete Required SB 244 Analysis and General Plan Revisions**

As we have advised the City previously, Gov. Code. § 65302.10 requires all jurisdictions in California to, upon the next revision of their housing element, adopt revisions to the land use element of their General Plan that identify Disadvantaged Unincorporated Communities (DUCs) within their sphere of influence, inventory the basic infrastructure and service needs of those communities, and identify possible funding sources that could support the resolution of these deficiencies. Gov. Code. § 65302.10. Accordingly, the City must complete this analysis concurrent with or prior to the date on which its housing element is due.

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<sup>4</sup> Memorandum to Planning Directors and Interested Parties from Paul McDougall, HCD, regarding "Housing Element Updates and the 2014 San Joaquin Valley Fair Housing and Equity Assessment," dated February 9, 2015.  
764 P Street, Suite 012, Fresno, California 93721  
Telephone: (559) 369-2790

Mayor Ashley Swearengin, City Council, & DARM

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The City has not completed or, to our knowledge, initiated this analysis to date. The Final Housing Element must contain policies and programs consistent with a analysis completed pursuant to Gov. Code. § 65302.10.

\* \* \* \* \*

Thank you for your consideration of our comments. Please contact me at my office in order to set up a time to discuss these comments in person.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Werner", is placed over a light blue rectangular background.

Ashley Werner, Esq.

Leadership Counsel for Justice and Accountability

cc: Jennifer Clark, Director, DARM, City of Fresno  
Sophia Pagoulatos, DARM, City of Fresno  
Doug Sloan, City Attorney  
Paul McDougall, California Department of Housing & Community Development  
Tom Brinkhuis, California Department of Housing & Community Development

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February 29, 2016

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[Sophiap@fresno.gov](mailto:Sophiap@fresno.gov)

RE: Fresno General Plan  
2015-2023 Housing Element  
Public Review Draft, January 2016

Dear Ms. Pagoulatos:

Please consider this letter pursuant to the requirements of California Public Resources Code § 21091(d).

I write to raise three concerns: First, that the Housing Element draft addresses neither Fresno's historically significant overproduction of above-moderate income housing, nor its historically egregious underproduction of housing for families with moderate and lower incomes. Second, that the draft Housing Element's Sites Inventory Table catalogues available sites by affordability in a manner that perpetuates existing segregated housing patterns, and places the City's Housing Element at odds with its HUD-required Analysis of Impediments to Fair Housing. And third, that the City's public participation process – in this as in other planning efforts – was insufficient to gauge public concerns or to receive adequate public input.

*The Housing Element perpetuates underproduction of affordable housing*

Fresno's most recent Housing Element Annual Progress Report (2014) reported to HCD on Fresno's Regional Housing Needs Allocation Progress:

- Of the almost 5,000 units of very low income housing needed since 2006, the City had entitled only 923, or 19%.
- Of the almost 3,300 units of low income housing needed since 2006, the City had entitled only 929, or 28%.
- Of the approximately 3,700 units of very low income housing needed since 2006, the City had entitled only 96, or 3%.
- In stark contrast to this sorry record of underproduction, between 2006 and 2014 the City entitled 17,680 above-moderate income units, 192% of those actually needed.

Nevertheless, the draft Housing Element takes credit only for overproduction of above moderate income housing since 2013, and finds an additional 5,000 such units required between now and 2023. Still more problematically, the Sites Inventory allocates sites 60% more than those needed – almost 8,000 new above moderate housing units.

At the lower end of the affordability spectrum, the since-2013 calculus effectively erases the existing 8,500-unit deficit in affordable homes, taking credit for the almost 1,100 such units built since 2013 and setting a new goal of not even 12,000 new homes affordable to families of moderate and lower incomes. For these categories, the Sites Inventory allocates between 25 and 30% more than those needed.

The result, as any first-year economics student knows, is a shortage of supply in an environment of steep demand. In blessing this state of affairs with its tepid production of affordable housing, and its historical refusal to enforce housing codes aggressively, the City of Fresno rigs the market to ensure that landlords will have no need to compete for low income tenants. Such property owners therefore experience no felt need to maintain rental units in habitable condition or otherwise abide by laws intended to ensure renting families safe, decent and secure homes in exchange for their rent payments.

In order to begin to rectify these imbalances, the City must acknowledge its failures in past years to create a coherent affordable housing program that balances reasonable growth in above moderate level housing with adequate provision for those with lower incomes.

*The Housing Element perpetuates existing patterns of racial segregation*

As the attached maps make clear, the City has designated parcels available for new housing units by assuming maximum capacity in downtown to absorb housing of all types, but without distributing Low or Very Low units into areas that the federal Department of Housing and Urban Development refers to as “Neighborhoods of Opportunity.”

The reader must appreciate the heavy allocation of Above Moderate units to the south part of the City. At the same time, the City’s decision to preserve the northern fringes (see map at p. 5) as a high-income enclave promotes the racially segregating effect of economic segregation, and undermines the very purposes of the City’s HUD-mandated Analysis of Impediments to fair housing (AI), which is also going forward at this very moment.

We respectfully suggest that the City use both the AI and its Housing Element to create a coherent fair housing policy that furthers the City’s goals of providing safe and decent housing to all residents, of all income levels, in all areas of the City.

*The City must improve its public participation processes*

Public participation processes require resources, and skills, that planning staff ordinarily do not have at their disposal. Public participation requires

thoughtful analysis of the ways in which the Housing Element actually matters to members of the public, and a messaging campaign that carries that information compellingly to those most affected. This means messages targeted to the interests of the public, delivered through multiple media (e.g. – among many others – radio and television, in English, Spanish and Hmong; print media; notices in community based organizations’ newsletters).

It is unreasonable to expect professional planning staff – who are allocated no resources for these purposes, and whose graduate education would not have included public relations training – to perform the additional messaging and dissemination functions that properly belong to public relations professionals.

The result of these misguided management decisions is a predictably low level of attendance at public meetings, an average of slightly over 6 persons at each of the nine public meetings held. This is by no means an unusual outcome for City planning outreach efforts, and is frustrating for the hardworking planners and other staff who organize and conduct these meetings, as well as for the members of the public who learn belatedly about decisions taken by their city government without adequate public input.

Thanking you for your consideration, I remain,

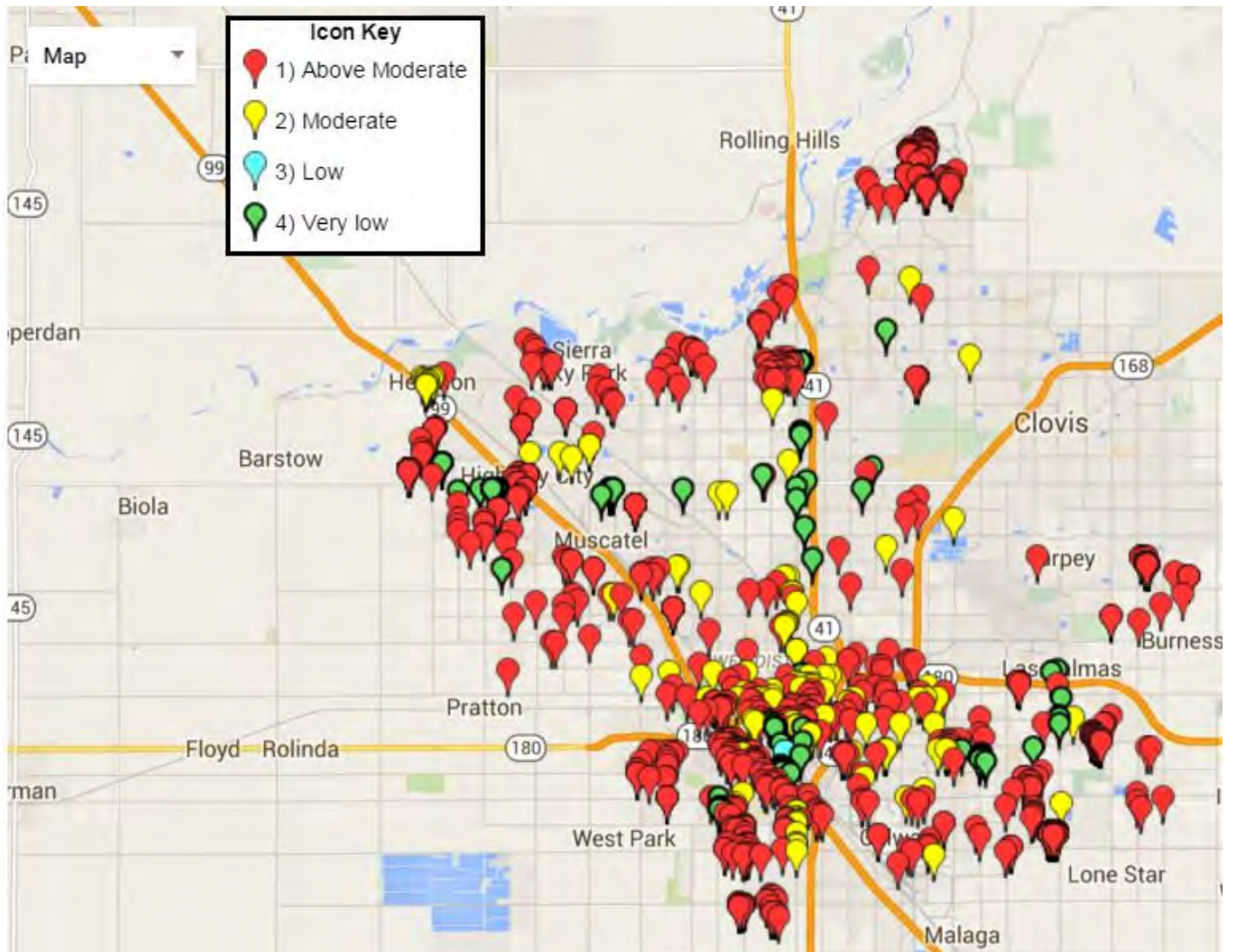
Very truly yours,

Patience Milrod

cc: Jeff Jackson, HUD  
Adriana Windham, HUD  
Doug Sloan, City Attorney

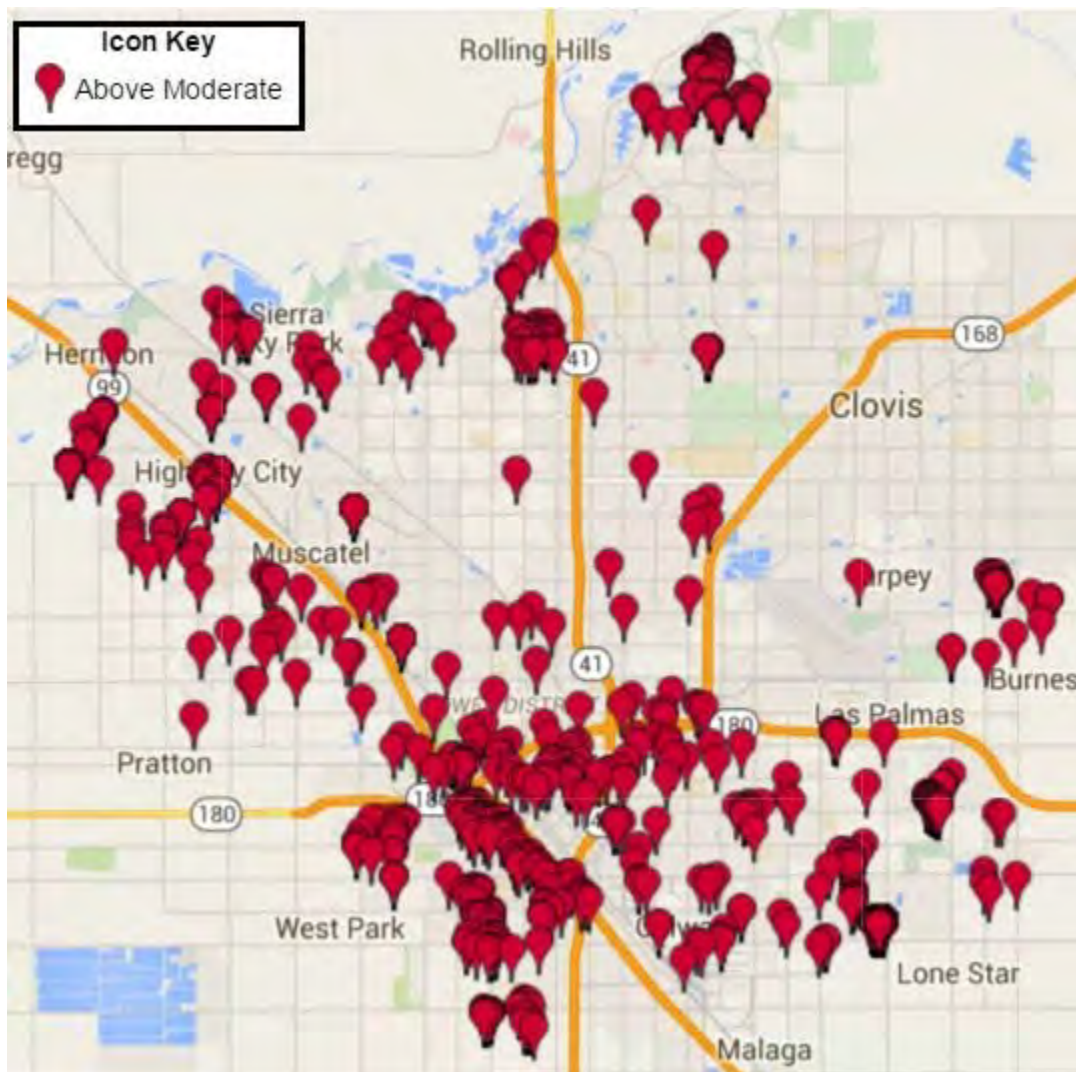


**City of Fresno 2015-2023 Housing Element  
Parcels Available for New Units – all income levels**



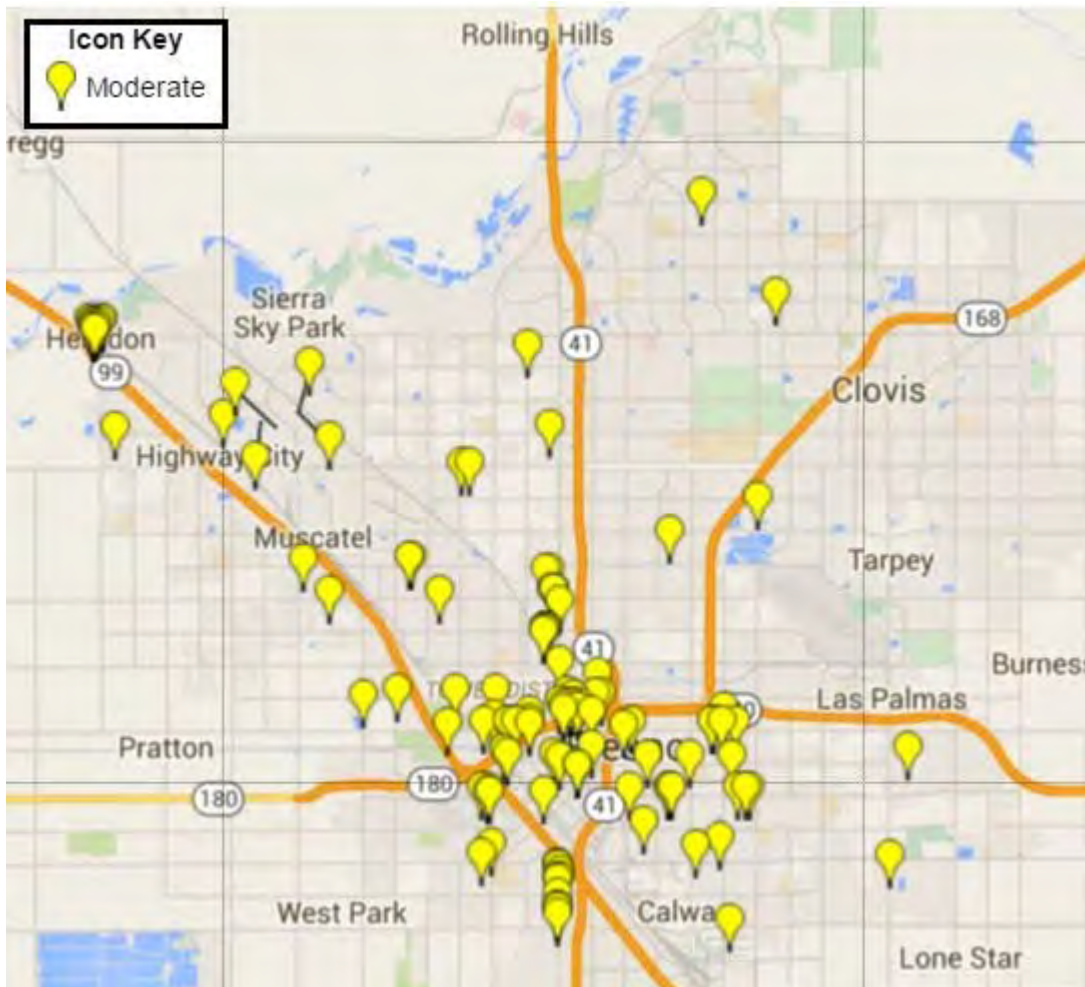
The link at [Housing Affordability Ratings](#) will permit closer examination of the map.

**City of Fresno 2015-2023 Housing Element  
Parcels Available for Above-Moderate Income Units**



Each pin represents a parcel in the draft Housing Element Sites Inventory Index (Appendix B), available for Above Moderate income housing and already assigned a street address; 606 parcels are therefore not included. The link at [Housing Affordability \(Above Moderate\)](#) will permit closer examination of the map.

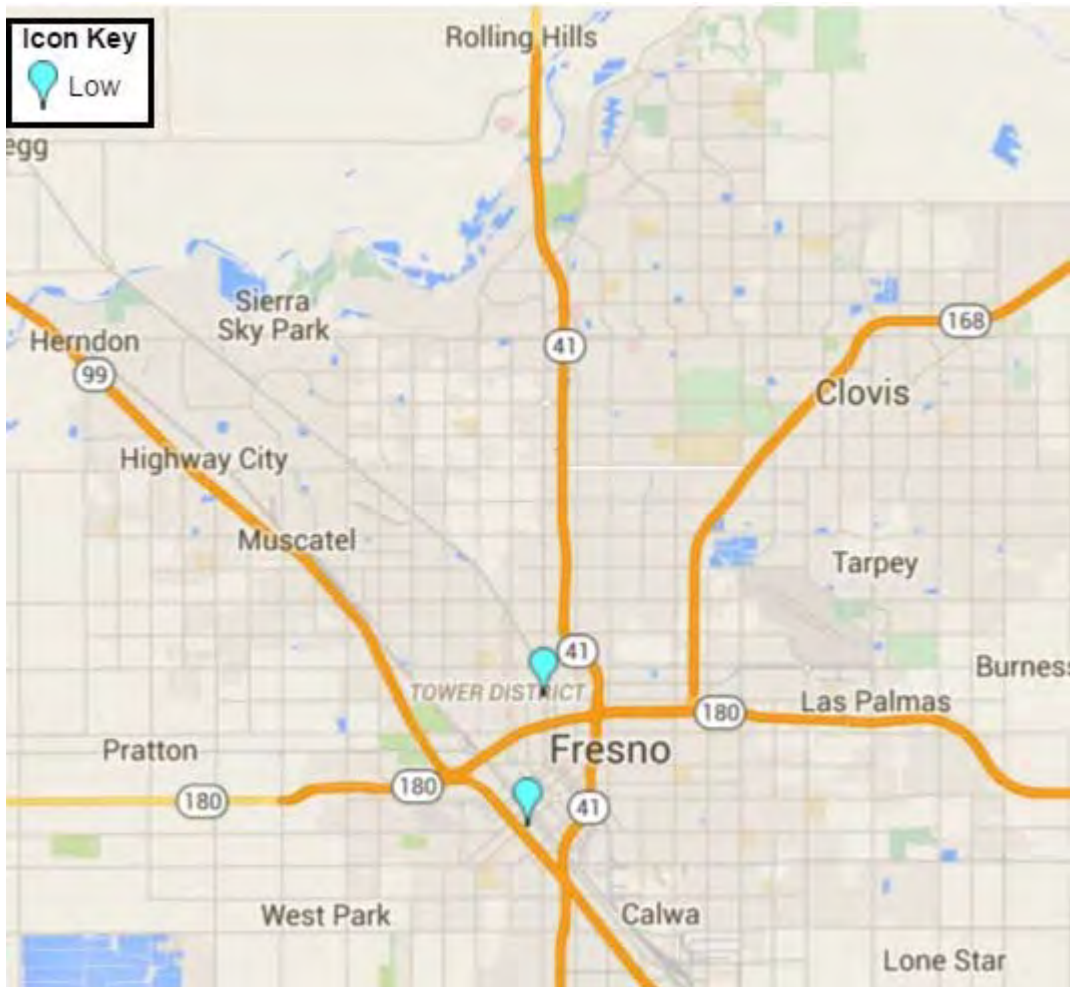
## City of Fresno 2015-2023 Housing Element Parcels Available for Moderate Income Units



Each pin represents a parcel in the draft Housing Element Sites Inventory Index (Appendix B), available for Moderate income housing and already assigned a street address. 154 parcels are therefore not included. The link at [Housing Affordability Rating \(Moderate\)](#) will permit closer examination of the map.

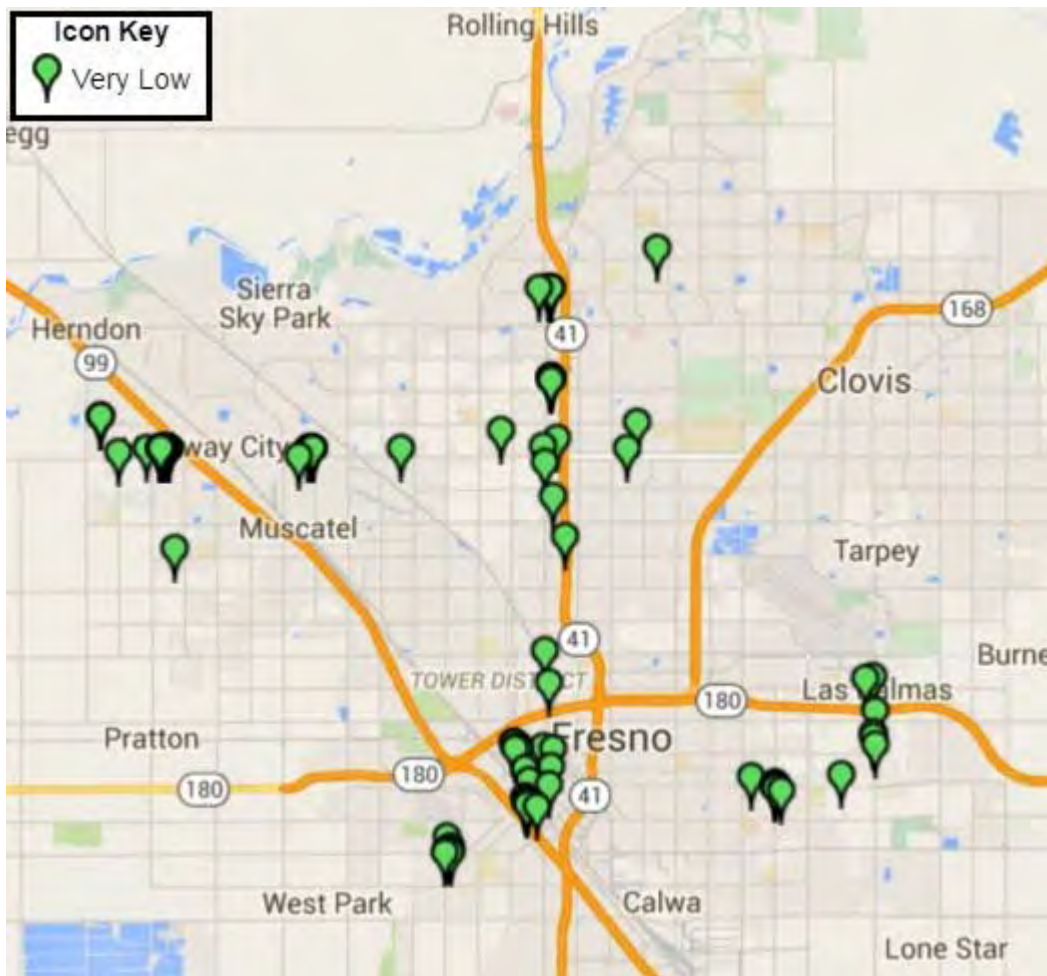


## City of Fresno 2015-2023 Housing Element Parcels Available for Low Income Units



Each pin represents a parcel in the draft Housing Element Sites Inventory Index (Appendix B), available for Low income housing and already assigned a street address; both parcels are represented here. The link at [Housing Affordability Rating \(Low\)](#) will permit closer examination of the map.

**City of Fresno 2015-2023 Housing Element  
Parcels Available for Very Low Income Units**



Each pin represents a parcel in the draft Housing Element Sites Inventory Index (Appendix B), available for Very Low income housing and already assigned a street address; 134 parcels are therefore not included. The link at [Housing Affordability Rating \(Very Low\)](#) will permit closer examination of the map.



## **CITY SEEKS INPUT ON HOUSING PLAN CHANGES**

The City of Fresno is beginning the process of amending its adopted housing element to incorporate changes in 3 areas:

- Mobile Home Park Conservation Program
- Equitable Communities Program
- Housing Need from Prior Housing Element Cycle (2008-2015)

If you have ideas on these topics, you can provide input in the following ways:

- Email comments to [housingelement@fresno.gov](mailto:housingelement@fresno.gov)
- Send written comments to the Development and Resource Management Department, Long Range Planning Division, Fresno City Hall, Rm. 3065, 2600 Fresno Street, Fresno, CA 93721
- Attend one of the upcoming workshops:

Neighborhood Workshop: December 6, 2016, 6:30 p.m.  
Cooper Academy Middle School  
2277 W. Bellaire Way, Fresno, CA 93705

Stakeholder Workshop: December 14, 2016, 5:00 p.m.  
Housing and Community Development Commission  
Fresno City Hall  
2600 Fresno Street, Room 2165, Fresno, CA 93721

Neighborhood Workshop: December 15, 2016, 6:00 p.m.  
Wesley United Methodist Church  
1343 E. Barstow Ave, Room 4, Fresno, CA 93710

More information is available at [www.fresno.gov/housingelement](http://www.fresno.gov/housingelement) or by calling Sophia Pagoulatos at 621-8062.

The City of Fresno's goal is to comply with the Americans with Disabilities Act (ADA) in all respects. The meeting room is physically accessible. If, as an attendee or participant at the meeting, you need additional accommodations such as interpreters, signers, assistive listening devices or the services of a translator, please contact the

Office of the City Clerk at (559) 621-7650 or [clerk@fresno.gov](mailto:clerk@fresno.gov). To ensure availability, you are advised to make your request at least 48 hours prior to the meeting. The agenda and any related information is available at [www.fresno.gov/housingelement](http://www.fresno.gov/housingelement) as well as in the Office of the City Clerk.

## **ESPAÑOL:**

### **CUIDAD BUSCA IDEAS SOBRE CAMBIOS EN EL PLAN DE VIVIENDA**

La Ciudad de Fresno está comenzando el proceso de modificación de su elemento de vivienda aprobado para incorporar cambios en 3 áreas:

“ Programa de Conservación del Parque de Casas Móviles

“ Programa de Comunidades Equitativas

“ Necesidad de Vivienda Del Anterior Ciclo Del Elemento de Vivienda (2008-2015)

Si tienen ideas sobre estas temas, puede proporcionar información de las siguientes maneras:

- Comentarios por Email [housingelement@fresno.gov](mailto:housingelement@fresno.gov)
- Comentarios por escrito al Departamento de Gestión de Recursos Y Desarrollo, División de Planificación de Largo Alcance, Fresno Ayuntamiento, Cuarto 3065, 2600 Fresno Street, Fresno, CA 93721
- Asistir a uno de los próximos talleres:

Taller: Diciembre 6, 2016, 6:30 p.m.  
Cooper Academy Middle School  
2277 W. Bellaire Way, Fresno, CA 93705

Taller: Diciembre 14, 2016, 5:00 p.m.  
Comisión de Vivienda y Desarrollo Comunitario de  
Fresno Ayuntamiento  
2600 Fresno Street, Cuarto 2165, Fresno, CA 93721

Taller: Diciembre 15, 2016, 6:00 p.m.  
La Iglesia Metodista Wesley  
1343 E. Barstow Ave, Sala 4, Fresno, CA 93710

Más información está disponible en [www.fresno.gov/housingelement](http://www.fresno.gov/housingelement) o llamando a Sophia Pagoulatos al 621-8062.

La meta de la Ciudad de Fresno, es cumplir con la Ley de Estadounidenses con Discapacidades (ADA) en todos los aspectos. La sala de reuniones está físicamente accesible. Si, como un asistente o un participante en la reunión, necesita acomodaciones adicionales como intérpretes, firmantes, dispositivos de audición o los

servicios de un traductor, por favor, póngase en contacto con la Oficina del Secretario de la Ciudad al (559) 621-7650 o Clerk@fresno.gov. Para garantizar la disponibilidad, le recomendamos que haga su solicitud al menos 48 horas antes de la reunión. El programa y toda la información relacionada está disponible en [Www.fresno.gov/housingelement](http://Www.fresno.gov/housingelement) así como en la oficina del Secretario de la Ciudad.

## **HMOOB**

### **Ib tsoom Nomtsww hauv Fresno xav tau Pejxeem cov tswv yim**

Tsoomfwv saib xyuas lub nroog Fresno npaj yuav pauv thiab tsim ib cov kev cai tshiab rau sab Vajtsev, yog li ntawd, Tsoomfwv tau caw ib tsoom Pej Xeev suav daws kom nej xa nej cov tswv yim tuaj mus rau lawv. Cov Cai uas yuav pauv yog rau 3 yam kev pab muaj npe xws li hais nram no:

- Mobile Home Park Conservation Program
- Equitable Communities Program
- Housing Need from Prior Housing Element Cycle (2008-2015)

Yog nej leej twg ho muaj ib lub tswv yim xav kom Tsoomfwv saib lub nroog Fresno paub txog no thov nej xa nej cov tswv yim tuaj rau peb. Peb muab 3 txoj kev xa rau nej xaiv:

- Xa Email rau [housingelement@fresno.gov](mailto:housingelement@fresno.gov), los yogõ
- Sau ntawv rau Development and Resource Management Department, Long Range Planning Division, Fresno City Hall, Rm. 3065, 2600 Fresno Street, Fresno, CA 93721, los yogõ
- Tuaj ntsib peb rau peb cov rooj sib tham:

### **Kev sib tham rau Pejxeem nyob hauv lub zejzog zaum:**

Hnub Tim: December 6, 2016, 6:30 p.m.

Qhov Chaw: Cooper Academy Middle School  
2277 W. Bellaire Way, Fresno, CA 93705

### **Kev sib tham rau cov neeg muaj Vajtsev thiab suav daws:**

Hnub Tim: December 14, 2016, 5:00 p.m.

Qhov Chaw: Housing and Community Development Commission  
Fresno City Hall  
2600 Fresno Street, Room 2165, Fresno, CA 93721

### **Kev sib tham rau Pejxeem nyob hauv lub zejzog zaum:**

Hnub Tim: December 15, 2016, 6:00 p.m.

Qhov Chaw: Wesley United Methodist Church  
1343 E. Barstow Ave, Room 4, Fresno, CA 93710



Yog tias koj xav paub ntau tshaj ntxiv qhov no ntsiv no mus rau hau peb lub website, [www.fresno.gov/housingelement](http://www.fresno.gov/housingelement) los sis hu rau Sophia Pagoulatos ntawd (559) 621-8062.

Tsoomfwv lub hom phiaj yog xav ua raws li txoj cai hu ua, **Americans with Disabilities Act (ADA)** tau zwm tseg. Peb cov tsev sib tham kuj ua kom yooj yim rau cov neeg uas mus tsis tau kev tib si. Thiab yog tias koj ho xav tau kev pab xws li: txhais lus, piav lus, mus rau cov uas mloog lus ntawm lub pob ntseg no thov koj hu rau peb ntawd tus xovtooj (559) 621-7650, los yog xa email rau ntawm [clerk@fresno.gov](mailto:clerk@fresno.gov). Peb xav kom koj txais tau kev pab xws li koj lub siab nyiam. Yog li ntawd, thov koj hu rau peb li 48 xuaj moos ua ntej lub rooj sablaj uas koj npaj tuaj. Yog tias koj xav paub tias peb yuav tham txog dab tsi hauv cov rooj sablaj, koj mus rau lub website, [www.fresno.gov/housingelement](http://www.fresno.gov/housingelement), los yog tuaj tim lub tuam tsev Fresno City, mus ntsib tus City Clerk.

**Public Outreach and Comments on  
Draft 2017 Housing Element Amendment**



## **HOUSING PLAN AMENDMENT WORKSHOPS**

The City of Fresno is holding two workshops on the draft Housing Element Amendment on February 1 and February 8, 2017. The meetings will take place at Fresno City Hall at the times and locations noted below.

In April of 2016 the City of Fresno updated and adopted its Housing Element. The Housing Element is a state-mandated planning document for housing. Following receipt of comments from the California Department of Housing and Community Development, the City prepared a draft amendment to the adopted Housing Element in December of 2016. The draft amendment was made available to the public for a 30-day comment period from December 13, 2016 to January 13, 2017.

The workshops will cover the public comments received about the draft amendment, and proposed revisions to the Housing Element Amendment,

### **Meeting details:**

February 1, 2017, 6:00 p.m. or thereafter  
Planning Commission  
Fresno City Hall Council Chamber, Second Floor  
2600 Fresno Street, Fresno, CA 93721

February 8, 2017, 5:00 p.m. or thereafter  
Housing and Community Development Commission  
Fresno City Hall, Room 2165, Second Floor,  
2600 Fresno Street, Fresno, CA 93721

More information is available at [www.fresno.gov/housingelement](http://www.fresno.gov/housingelement) or by calling Sophia Pagoulatos at (559) 621-8062.



## **TALLERES SOBRE EL PLAN DE VIVIENDA**

La Municipalidad de Fresno realizará dos talleres sobre el Enmienda del Plan de Vivienda el 1 y el 8 de febrero del 2017. Los talleres se llevará a cabo en la Municipalidad/Fresno City Hall (ver detalles al final para la hora y la ubicación).

En abril del año 2016 el Concejo Municipal de Fresno actualizó y adoptó el Elemento de Vivienda. El Elemento de Vivienda es un documento de planificación requerido por el Departamento de Viviendas y Desarrollo Comunitario del Estado de California. Después de recibir comentarios del Departamento de Viviendas y Desarrollo Comunitario del Estado de California, la Municipalidad de Fresno preparó un enmienda del Plan de Vivienda en Diciembre del 2016. Se solicitó comentario público sobre este enmienda borrador del Plan de Vivienda desde el 13 de diciembre del 2016 hasta el 13 de enero del 2017. El propósito de los talleres es revisar los comentarios públicos recibidos y las revisiones propuestas al enmienda del Plan de Vivienda.

### **Detalles de Los Talleres:**

February 1, 2017, 6:00 p.m. o a partir de entonces  
Comisión de Planificación  
Sala Consistorial del Ayuntamiento, Segundo Piso  
2600 Fresno Street, Fresno, CA 93721

February 8, 2017, 5:00 p.m. o a partir de entonces  
Comisión de Vivienda y Desarrollo Comunitario  
Fresno City Hall, Cuarto 2165, Segundo Piso,  
2600 Fresno Street, Fresno, CA 93721

Para obtener información adicional sobre el proyecto propuesto, tomar contacto con la Ciudad de Fresno Departamento de Desarrollo y Gestión de los Recursos, Ayuntamiento, 2600 Fresno Street, Room 3065, Fresno, California, 93721, o Sophia Pagoulatos en at [sophia.pagoulatos@fresno.gov](mailto:sophia.pagoulatos@fresno.gov) (o por telefono: (559) 621-8062)



October 19, 2016

Mayor Ashley Swearengin  
2600 Fresno Street, Room 2075  
Fresno, CA 93721

Fresno City Council  
2600 Fresno Street, Room 2097  
Fresno, CA 93721

*Sent via E-mail & U.S. Mail*

**RE: Council Agenda Item ID 16-1158, Downtown Development Code:  
Compliance with Housing Element Law Adequate Sites Requirements**

Dear Mayor Swearengin and Councilmembers:

We are writing with respect to Council Agenda Item ID 16-1158, which includes a hearing by the City Council to consider adoption of the Downtown Development Code, to remind the City of its obligations under state housing element law to make sites available to meet the City's need for affordable housing pursuant to its regional housing needs allocation for the current housing element planning period and satisfy its unmet need for housing for the prior planning period.

The October 2016 Public Hearing Draft Downtown Development Code posted on the Council website for Agenda Item 16-1158 includes redline revisions that would allow downtown housing projects to obtain by right approval via a Zone Clearance permit for projects that are located Downtown, include a minimum of 16 total dwelling units, have a residential density of at least 20 dwelling units per acre, where at least 50% of the floor area is occupied by residential uses and which have no historic resources located onsite. City Planning Manager Dan Zack, during his presentation to Council as part of a workshop on the Downtown Development Code and City Housing Element on October 5, 2016, stated that staff believes these proposed revisions will satisfy the City's obligation to make sites available to satisfy the City's current RHNA and its unmet need for housing in a manner that satisfies the requirements of Government Code section 65583.2(h). Staff's assessment reflects an inaccurate interpretation of the City's obligations under State Housing Element Law for several reasons.

First, Section 65583.2(h) requires the City to make sites available to accommodate 100% of the un-accommodated need for housing for very low and low

income households by right on sites zoned with minimum density and development standards of 16 units per site, at least 20 units per acre and ensure that at least 50% of the sites allow only residential uses or require that residential uses occupy 50% of the total floor area of a mixed use project. The Downtown Development Code revisions do not require development projects to satisfy these standards on identified sites, but rather would allow them to obtain by right approval if they do.

Second, an attempt by the City to accommodate the portion of its RHNA that is not satisfied through its sites inventory and to meet its carry-over obligation solely through sites in the Downtown area would impermissibly exacerbate the concentration of sites for lower-income housing in areas of racially and ethnically concentrated poverty and economically distressed neighborhoods. As we explained to the City in our letter to the City dated July 7, 2016, high density sites identified in the Housing Element Sites Inventory are predominately located in and around Highway City, an economically disadvantaged “Inner City” area as designated by the City that lacks basic services and amenities, as well as in Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) in the Downtown, West Fresno, and Pinedale. Except for two locations within and adjacent to Pinedale, the Housing Element meanwhile contains *no* high density sites on or North of Herndon Avenue. As explained in our July 7th letter, these areas are characterized by deficient and absent infrastructure and services, including transit service and amenities to support walking and biking; a lack of retail options and health services; and high levels of pollution burden according to the EPA. The City must not further concentrate sites to meet its need for housing affordable to lower-income households in R/ECAPs and economically distressed neighborhoods and must instead make sites available in higher income and higher opportunity neighborhoods that currently lack such housing opportunities. Gov. Code § 65583(c)(5).

Finally, the City must make a diligent effort to achieve the participation of all economic segments of the community in its preparation and adoption of a housing element that substantially complies with state law. Government Code § 65583(c)(7). HCD’s findings on the City’s 2015-2023 Housing Element dated August 11, 2016 specifically direct the City to engage the community and “provide a variety of meaningful opportunities for input, beyond testimony at a public hearing” to develop revisions that bring the Housing Element into compliance with state law. The City’s duty to engage the public in the development of revisions to the Housing Element includes revisions necessary to satisfy the City’s RHNA and carry-over need and to comply with Section 65583.2(h). The City has not made efforts to engage the public in the development of revisions to the Housing Element, including revisions to address its RHNA and carry-over need. Therefore, it is premature for the City to indicate that its adoption of the Draft Downtown Development Code redline revisions will satisfy its obligations under Section 65583.2(h) or other provisions of the housing element statute.

The City must prepare revisions to its Housing Element that identify sufficient adequate sites to satisfy its current RHNA as well as its carry-over obligation in accordance with Government Code section 65583.2(h) and address the Housing Element's other deficiencies as detailed in our previous written and oral comments to the City and by HCD in collaboration with residents and community stakeholders.

Please feel free to contact me at (559) 369-2786 to find a time to discuss this letter over the phone or in person.

Sincerely,



Ashley E. Werner  
Attorney

Cc: Douglas Sloan, City Attorney  
Paul McDougall, HCD



December 7, 2016

Sophia Pagoulatos  
Development and Resource Management Department  
Long Range Planning Division  
Fresno City Hall, Rm. 3065  
2600 Fresno Street, Fresno, CA 93721

*Sent via Email*

**Re: 2015-2023 Housing Element Amendment**

Dear Ms. Pagoulatos:

We are writing on behalf of our clients, Familias Addams por un Mejor Futuro, in response to the email sent by Amber Piona on December 2, 2016 entitled, "Housing Element amendment" and addressed to "Housing Element Stakeholders". The proposed public participation process for the Housing Element amendment is not sufficient. We ask that the City take steps to effectively engage the public.

The City must "make a diligent effort to achieve public participation of all economic segments of the community" in developing its housing element amendment. Gov. Code § 65583(c)(8). As stated in HCD's letters dated March 7, April 17, and August 11, 2016, the City must release draft revisions to the public for review and input prior to submission by HCD. The City's failure to do so for the drafts of the 2015-2023 "denied the public an important opportunity for public input" and violated its duty to make a diligent effort to engage the public in the development of the housing element pursuant to section 65583(c)(8). HCD, March 7, 2016 Letter, p. 4. The City must incorporate the input received at the resident and stakeholder workshops into the draft housing element revisions before releasing them for public review and allow adequate opportunity for public review of these revisions prior to submission to HCD in order to comply with the law's public engagement requirements.

As we noted to the City via written correspondence dated September 6, 2016, HCD emphasized in August 11th findings that the Housing Element does not comply with state law that:

*"Throughout the housing element process, the City must engage the community, including organizations that represent lower-income and special needs households, by making information and revisions regularly available in a timely fashion and considering and incorporating comments where appropriate. Revisions should be well noticed and available prior to submitting the element to the Department. In addition, the City should provide a variety of meaningful opportunities for input, beyond testimony at a public hearing."*

Accordingly, the City must ensure that opportunities to provide input on the housing element amendment are well-noticed. Any notices released by the City should be in terms that are easy to



understand for residents and stakeholders not versed in state housing element law and that encourage input. For instance, the email advisory mentioned above in this letter uses technical terminology like “Housing Need from Prior Housing Element Cycle (2015-2023)” that most residents and stakeholders are unlikely to understand and which will not effectively solicit input on the topic of the availability of sites for affordable housing.

In addition, the City must make efforts to inform residents of all income levels and stakeholders of the opportunity to provide input in ways other than email, which many low-income residents lack access to. Just four people attended the first public workshop on the housing element amendment on December 6, 2016. This poor attendance mirrors the poor attendance of the City’s workshops on the draft housing element last fall, which the City also relied used email notices to advertise. Email announcements of public workshops are clearly not an effective or adequate method of achieving public participation in the housing element update process, especially if the announcements provide little advance notice of the meeting dates and use technical terminology. In order to comply with Government Code section 65883(c)(8), the City must modify and supplement its efforts to inform the public of the opportunity to provide input on the housing element amendment in a manner designed to *actually* achieve public participation.

As we have recommended in the past, we suggest that the City use local foreign language media, such as Univision, Radio Bilingue, and Hmong TV -- which reach thousands of low-income residents on a daily basis and provide free advertising for community-oriented events -- to encourage the public to attend public workshops. We also suggest that the City directly inform resident leaders of the opportunity to provide input and request that they inform their networks of the opportunity, and that the City partner with schools and local non-profits to hold public workshops in conjunction with regularly scheduled meetings which are attended by residents. Please let us know if we can assist the City in implementing these recommendations by providing the City with contact or other information.

The Housing Element Amendment process must also allow and encourage the public to provide input and incorporate input on all areas of the 2015-2023 Housing Element which are currently deficient in order for the City’s to substantially comply with state Housing Element Law. The City’s December 2<sup>nd</sup> email states that the City “is beginning the process of amending its adopted Housing Element to incorporate changes in 3 areas” – the “Mobile Home Park Conservation Program,” “Equitable Communities Program,” and “Housing Need from Prior Housing Element Cycle (2008-2015)” -- and informs recipients that they may provide input on these topics by submitting written comments to the City by email or at City Hall and by attending one of three public workshops. Yet the Housing Element’s deficiencies include not only but extend beyond the topic areas listed in the December 2<sup>nd</sup> email.

In addition to deficiencies in the topic areas listed, as described in our July 7, 2016 comments, the Housing Element deficiencies include but are not limited to its failure to (1) identify adequate sites to meet the need for housing affordable to all income groups for the current planning; (2) include program actions to zone sites to meet the need for affordable housing, including outside of racially and ethnically concentrated areas of poverty and economically distressed areas and in high opportunity neighborhoods; and (3) analyze the special housing needs of the population, including the needs of Limited English Proficient speakers and undocumented residents. The City’s housing element amendment process must not limit input to the three topic areas identified

December 7, 2016

in the City's December 2nd email but must allow and encourage input on *all* aspects of the 2015-2023 Housing Element which do not currently comply with state law. For your convenience, attached hereto are our comments on the 2015-2023 Housing Element dated July 7, 2016 which identify deficiencies with the Housing Element and provide recommendations for revisions to address those deficiencies. In addition, we have attached our letter to the City dated October 19, 2016 regarding the requirements established by Government Code section 65583.2(h) for sites identified by the City to satisfy its carry-over obligation.

Please contact me at my office at (559) 369-2786 if you have any questions or would like to discuss this letter over the phone or in person.

Sincerely,



Ashley Werner  
Attorney  
Leadership Counsel for Justice and Accountability



Valerie Feldman  
Attorney  
Public Interest Law Project

cc: Mayor Ashley Swearengin  
Councilmember Esmeralda Soria, District 1  
Councilmember Steve Brandau, District 2  
Councilmember Oliver Baines, District 3  
Councilmember Paul Caprioglio, District 4  
Councilmember Sal Quintero, District 5  
Councilmember Lee Brand, District 6  
Councilmember Clint Olivier, District 7  
Douglas Sloan, City Attorney  
Paul McDougall, California Department of Housing and Community Development

January 12, 2017

Sophia Pagoulatos  
Development and Resource Management Department  
Long Range Planning Division  
CITY OF FRESNO  
2600 Fresno Street  
Fresno, CA 93721

**RE: Comments on the City of Fresno's Revised Housing Element Public Draft 2015-2023**

Dear Ms. Pagoulatos:

We are writing to make comments on the City of Fresno's Housing Element Revised Public Draft 2015-2023. Thank you for the opportunity to submit comments and for your attention to them.

There is a big need for and lack of access for affordable housing for people of low income and good quality places throughout the city. Many residents struggle to pay rent and the cost of utilities. They live in apartments in poor conditions that threaten their health. They encounter special barriers to access safe and fair-priced homes because of their immigration status, language, or other factors. They live in neighborhoods in south Fresno where they lack access to basic infrastructure and where there is more air pollution due to the city's lack of attention in these places and the lack of affordable housing opportunities in locations with more resources like north Fresno. For this reason, it is very important for us that the City prepare and implement a Housing Element that effectively eliminates barriers to fair housing for all residents, regardless of the level of income or wealth.

**1. Public Process**

It is critical that the City truly seeks the opinions of residents about their needs and priorities related to housing to prepare their housing element. The City did not do enough to inform the public about the opportunity to contribute to the revision of the housing element. Many residents would like to provide their opinion but do not know of the opportunity to do so. The City should extend the opportunity for comment because most of the public comment period was during the holidays when many people were traveling and with their family. Also, the City should share the opportunity with parents who participate in school councils and coffee hours and use other effective ways to solicit information from the public.

## **2. Housing Needs for Immigrants That Are Not Documented**

The Housing Element Revised Draft does not recognize barriers to fair and good-quality housing that non-legal immigrants (undocumented immigrants) have. These people work, pay taxes, and should have the same opportunity as other people. The Housing Element should recognize the following barriers and include the following programs and commitments to respond to the needs of this population:

- Analyze the housing needs of undocumented people.
- To the extent possible, open all housing assistance programs to undocumented persons. People without citizenship or a social security number cannot benefit from almost all the programs that exist in Fresno to help in access to affordable housing.
- Create a help program for the purchase of homes for people with documentation through help with down payment and low interest loans. Previously, there was a program like this for people with an ITIN number, but it was eliminated. A program like this is especially important for undocumented people because they have a difficult time getting good credit because they lack a social security number. Also, it is very difficult to save the amount of money needed for a cash down payment.
- Eliminate the City of Fresno's requirement that people without a social security card pay a deposit to the City for water service. Undocumented people are often very low income and the extra payment for water service is even harder to pay.

## **3. Need for Investment in Low Income Disadvantaged Communities and the Creation for Affordable Housing.**

Many of us have lived in neighborhoods located in South Fresno and Central Fresno with many needs for many years, but have seen no change. There should not be a difference between the districts of Fresno in terms of access to basic resources - sidewalks, lights, drainage, parks, supermarkets, health clinics, etc. – and access to affordable prices and good quality housing. We are all humans with the similar needs, dreams, rights and ambition, although some earn more. This means that the city and the housing element should have clear and strong programs to eliminate the shortcomings of infrastructure and services in disadvantaged districts in south Fresno and should believe opportunities that no longer exist in neighborhoods located North of Fresno, where these resources if they exist, for housing of people of every income level.

We recommend that:

- *Clear* commitments are included to create opportunities for housing at affordable prices on all sides of the city.
- Re-introduce the program that analyzes and prioritizes eliminating barriers to infrastructure in Program 27. The draft eliminates this commitment without explaining why, but was the most clear commitment, and should be included.

- The City should not allow or put business that do harm within neighborhoods. This includes recycling facilities and factories that emit pollution and generate traffic from trucks. There are many facilities already in neighborhoods in South Fresno that cause harm the quality of life. Fresno should change its rules and zoning to not allow more of these facilities be located within our neighborhoods and should make and implement the industrial compatibility study it promised to make as soon as possible to make a plan to eliminate industrial facilities conflicting with neighborhoods and the wellbeing of the community. Housing element should include a commitment to do this study within a year and implement it immediately.

#### 4. Programs for Mobile Home Owners and Residents

The mobile home residents often pay more than half of their income for rent and also the high cost of utilities and often lack of money to properly maintain their trailers. The Housing Element should include the following:

- Clear commitments from the City that it will take action to help with the maintenance of the rent and utilities for the mobile homes. Program 10A only contains commitments from the City to give information to others about resources that exist to help but does not include a commitment from the City itself on how it's going to help directly.
- Policies to protect tenants from mobile homes and/or the land under their mobile home against rent price increases, including a rent control program. Every year, rent in mobile home parks in Fresno increases, but residents' earnings do not rise as well. Then, each year, it is more difficult to pay the rent.
- Programs to support with the remodeling of mobile homes and help with the purchase of land where the mobile homes are parked.

Thank you for your attention to this letter.

We wait for your response,

El 12 de enero de 2017

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**RE: Comentarios sobre el Borrador Público de la  
Revisión del Elemento de Viviendas de  
2015-2023 de la Ciudad de Fresno**

Querida Sr. Pagoulatos:

Escribimos para hacer comentarios sobre el Boarrador Público del la Revisión del Elemento de Viviendas de 2015-2023 de la Ciudad de Fresno. Gracias por la oportunidad de submitir comentarios y por su atencción a ellos.

Hay un grand necesidad para y falta de aceso a viviendas de precios acesibles a personas de bajos ingresos y de buena calidad en lugares a través de la ciudad. Muchismas residentes tienen que luchar para pagar la renta y la costa de utilidades.

Viven en departamentos rentales en pesimas condiciones que amenazan la salud. Encuentran barreras especiales a accede a vivendas seguras y de precios justos por razon de su status de inmigracción, idioma, o otro factor. Y viven en barrios en el sur de Fresno que faltan aceso a infraestructura basica y donde haya más contaminación debido a la poca atencion pagado por la ciudad en estos lugares y la falta de oportunidades de viviendas de precios acesibles en lugares en el norte de Fresno con más recursos. Por eso, es muy importante a nosotros que la Ciudad

prepare y implemente un Elemento de Viviendas que realmente elimina las barreras al acceso a viviendas justas para todos residentes, sin importar el nivel de ingreso o riqueza.

## **1. Proceso Público**

Es crítico que la Ciudad verdaderamente busque las opiniones de residentes sobre sus necesidades y prioridades relacionadas a viviendas para preparar su elemento de viviendas. La Ciudad no hizo suficiente para informar al público sobre la oportunidad de contribuir a la revisión del elemento de viviendas. A muchísimas residentes les gustaría proporcionar sus opiniones pero no saben de la oportunidad de hacerlo. La Ciudad debería extender la oportunidad de dar comentarios, porque la mayoría del periodo de comentario público fue durante los feriados cuando muchas personas están viajando y con su familia. También, la Ciudad debería compartir la oportunidad con padres que participen en los consejos y horas de cafés de las escuelas y usar otras maneras efectivas de solicitar información del público.

## **2. Necesidades de Viviendas de Inmigrantes Que No Son Documentados**

El Borrador de la Revisión del Elemento de Viviendas no reconoce las barreras al acceso de viviendas a precios justos y de buena calidad que tienen inmigrantes sin estatus legal (inmigrantes no documentados). Estas personas trabajan, pagan impuestos, y deberían tener la misma oportunidad a otras personas. El Elemento de Viviendas debería reconocer las siguientes barreras e incluir los siguientes programas y compromisos para responder a las necesidades de esta población:

- Analizar las necesidades de viviendas de personas sin documentos.



- En la medida que es posible, abre todos los programas de ayuda en temas de viviendas a personas no documentados. Personas sin ciudadanía o un numero de seguridad social no pueden beneficiar de casi todos los programas que existen en Fresno para ayudar en el acceso a viviendas de precios accesibles.
- Creer un programa de ayuda para la compra de casas para personas sin documentacion, a través de ayuda con la engancha y préstamos de bajo interés. Anteriormente, existen un programa así para personas con un numero ITIN, pero se eliminó. Un programa así es especialmente importante para personas no documentados, porque tienen mucho dificultad en obtener crédito en términos buenos por falta de un numero de seguro social. También, es muy difícil ahorrar el dinero por la engancha todo en efectivo.
- Elimina el requisito de la Ciudad de Fresno de que personas sin un numero de seguridad social paga un deposito a la Ciudad para tener servicio de agua. Personas no documentados, a menudo, son de muy bajos ingresos y el pago extra para servicio de agua es más aún difícil pagar.

### **3. Necesidad de Invertamiento en Barrios Desfavorecidas y Creación de Oportunidades de Viviendas de Precios Accesibles en Barrios Con Más Oportunidades**

Muchos de nosotros han vividos en barrios en el sur de Fresno y Fresno central con muchas necesidades por muchos años, pero no hemos visto cambio. No debería ser diferencia entre los barrios de Fresno en términos de acceso a recursos básicos – banquetas, luces, drenaje, parques, supermercados, clinicas de salud, etc. --- y de acceso a viviendas de precios accesibles y de buena calidad. Todos somos humanos con las mismas necesidades, visión, derechos y ambición, aunque unos ganen más. Esto significa que la Ciudad y el Elemento de Vivienda



debería de tener programas claros y fuertes para eliminar las deficiencias de infraestructura y servicios en barrios desfavorecidas en el sur de Fresno y *también* debería de crear oportunidades que ya no existen en barrios en el norte de Fresno, donde estos recursos si existen, para viviendas para personas de cada nivel de ingreso.

Recomendamos que:

- Incluir compromisos *claros* para crear oportunidades de viviendas a precios accesibles en todos lados de la Ciudad.
- Re-incluya el programa de analizar y priorizar la eliminación de barreras a infraestructura en el Programa 27. El Borrador elimina el este compromiso sin explicar porque, pero fue lo compromise lo más claro del programa y debería ser incluido.
- No permiten o ponen negocios que causan daño dentro de los barrios. Esto incluye facilidades de reciclaje y fábricas que emiten pollución y generan trafico de camiones. Hay muchas facilidades así en barrios en el sur de Fresno que causan daño a la calidad de vida. La Ciudad de Fresno deberían de cambiar sus reglas y zonificcación para no permitir que más de ellos ubican dentro de nuestros barrios y deberían hacer y implementar el Estudio de la Compatibilidad de Industrias que lo prometió hacer lo más pronto possible para hacer un plan de como va a eliminar conflictos entre facilidades industriales y la buen estar de la comunidad. El Elemento de Viviendas debería de incluir un compromiso de hacer esto estudio dentro de un año y implementarlo inmediatamente.

#### **4. Programas para los Duaños y Residentes de Casas Mobiles**

Los residentes de casas móviles a menudo pagan más de la mitad de sus ingresos para la renta y también el alto costo de utilidades y muchas veces faltan el dinero para mantener adecuadamente sus trailers. El Elemento de Viviendas debería incluirlo siguiente:

- Compromisos claros de la Ciudad de tomar acción que ayudará con el mantenimiento de y la renta y utilidades para las casas móviles. El Programa 10A solamente contiene compromisos de la ciudad de dar información a otros sobre recursos que existen para ayudar pero no incluya un compromiso sobre acción la Ciudad misma va a tomar que va a ayudar directamente.
- Políticas para proteger inquilinos de casas móviles y/o la tierra debajo su casa móvil en contra de aumentos del precio de la renta, incluso un programa de control de rentas. Cada año, se aumenta la renta en parques de casas móviles en Fresno, pero las ganancias de los residentes no suben igualmente. Entonces, cada año, es más difícil pagar la renta.
- Programas para apoyar con la remodelación de casa móviles y ayuda para la compra de la tierra donde casas móviles están estacionados.

Gracias por su atención a esta carta. Esperamos su respuesta.

~~Beatriz~~ ~~Rojas~~

Clauvia

Adriana Gutiérrez

Raula Cárdenas

Virgilia Zaragoza

Guillermina León

Reyna León

Margarita Salazar

Alejandro J.

Zulma B.

Monica Vilda Cruz

Arnulfo Cruz

Eligia Santos

Jose Galindo

consuelo de la Cruz

Teresa Pablo Díaz

Sergio Leon Vazquez

Lino Perez G.

Basilio Aguilar

Maria del Carmen Padron

Sinceremente,

Esdras

Distrito 7

Yesenia

Jimenez District 3

Rosalina Caman

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ADRIANA FIGUEROA

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January 13, 2017

**Re: City of Fresno 2015-2023 Housing Element Amendment December 2016 Public Review Draft**

Dear Ms. Pagoulatos:

We are writing on behalf of our clients, Familias Addams por un Mejor Futuro, Rosalina Carson, and Rosalba Cardenas, with respect to the City of Fresno's 2015-2023 Housing Element Amendment December 2016 Public Review Draft (Draft Amendment). We provide these comments in order to assist the City in developing a final housing element that substantially complies with the requirements of state Housing Element Law and furthers the "early attainment of decent housing and a suitable living environment" for every Fresnan, as envisioned by the Legislature. Gov. Code § 65580(a).

**1. The City Continues to Flout the Housing Element Statute's Public Process Requirements**

After failing to meet the statutory deadline to adopt a valid housing element by December 31, 2015, the City's hurry to seek HCD's approval of its housing element, resulted in the City repeatedly failing to make a diligent effort to include the public in the housing element's development in violation of Government Code section 65583(c)(8). See HCD's March 7, April 7, and August 11, 2016; Leadership Counsel & Public Interest Law Project letters dated February 6 and 26, March 31, April 21, July 7, 2016. HCD's March 7<sup>th</sup> letter to the City found that the City "denied the public an important opportunity for public input" by submitting its January Draft Housing Element to the state prior to releasing a draft to the public for review and comment. Nevertheless, the City developed and submitted multiple additional draft housing element revisions to the state with little or no prior public review following HCD's issuance of its March 7<sup>th</sup> letter. HCD's August 11<sup>th</sup> letter on the City's adopted Housing Element emphasizes that the City "must engage the community" and "provide a variety of meaningful opportunities for input, beyond testimony at a public hearing."

Despite HCD's clear and repeated direction to the City to engage the public, the City has continued to demonstrate a lack of regard for the Housing Element Statute's public process requirements in the development of its Housing Element Amendment. The City noticed its three public workshops for the Draft Amendment just a few days before the first workshop. The email sent by the City to notify stakeholders used technical terminology (e.g., "Housing Need from Prior Housing Element Cycle (2015-2023)") not readily understandable to the general public.



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We advised the City in written correspondence dated December 7, 2016 that notices from the City relating to the housing element update must use clear language that is accessible to residents and must modify its efforts to achieve public participation, particularly due to the City's poor track record of attaining public participation through email notices in the previous housing element workshops. Exhibit A, attached hereto.

The City's efforts to date to obtain public input into the Draft Amendment do not meet the Government Code's standard. The City's previous efforts related to the current Adopted Housing Element, including workshops hosted by the City last fall do not substitute for public engagement in the Housing Element Amendment process, as City staff suggested at the stakeholder workshop. We urge the City to undertake additional efforts to provide meaningful opportunities for public input into the preparation of the final Housing Element Amendment that reach a greater number and cross-section of residents and stakeholders, including low-income residents with the greatest housing needs. We have provided various recommendations in our December 7, 2016 comment letter and other comment letters we have issued to the City pertaining to the 2015-2023 Housing Element for free and low-cost efforts the City can make to engage the public. We encourage the City to consider and utilize those recommendations.

The City also fell short of state law's standards by releasing a draft housing element amendment prior to the completion of public workshops for the amendment. Several residents and commissioners expressed their concern at the City's stakeholder workshop over the City's release of the Draft Amendment before seeking any public input on it.<sup>1</sup> Staff indicated that the timing of the release was a response to requirements of the state to amend their housing element. Yet HCD clearly stated in its August 11<sup>th</sup> letter and in its previous letters that the City must make diligent efforts to include the public in the **development** of its housing element.

The City further impeded public participation in the development of the Draft Amendment by releasing the Draft for a 30-day comment period during the middle of the holidays, with a comment period of December 13, 2016 to January 13, 2017. HCDC Commissioner Barbara Fiske asked staff at the stakeholder workshop if it could extend the public comment period beyond this period, noting that it is an "unusual time to ask community members and non-profits to engage people on housing." Staff indicated that they would not extend the comment period, but that there would be "public hearings" in March when the public could comment further. The City's actions and statements directly conflict with the direction provided by HCD that the City must make "meaningful opportunities for input, beyond testimony at a public hearing" available for residents.

The City continues to fall short of meeting the law's requirement to make a diligent effort to engage residents of all income levels, preventing the City from developing a housing element that addresses the housing needs of *all* residents.

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<sup>1</sup> As West Fresno resident Brunette Harris stated regarding the draft, "The City is supposed to get public input *before* making the plan. How is it that the City can come and plan things in a community, and they don't ask us what we want?"

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## **2. Draft Revisions Ignore Deficiencies Raised in Other Comment Letters.**

The Draft Amendment ignores deficiencies in the Adopted Element raised in previous comment letters that we have submitted, including in letters dated February 6 and 26, March 31, April 21, July 7, 2016. In addition to the deficiencies discussed in this letter below, the deficiencies that the Draft Amendment does not address include but are not limited to the following:

- Failure to analyze and address the needs of household with special housing needs, including in particular large households, single-parents households, non-English and Limited English Proficient speakers, immigrants, and undocumented residents.
- Failure to analyze and address barriers to affordable housing.
- Failure to demonstrate that each of the programs will achieve beneficial impacts within the planning period through the inclusion of specific action steps and time frames for implementation.
- Failure to address governmental constraints on the maintenance and development of affordable housing.
- Failure to address the findings of the 2016 Analysis of Impediments to Fair Housing.

Despite repeated requests by the public for the City to address these deficiencies, the Draft Amendment does not. The City must prepare a revised draft amendment that addresses the deficiencies raised in previous public comment letters before it may be found in compliance with state Housing Element Law.

## **3. The Inventory Remains Inadequate to Meet the Housing Needs of the Current RHNA and Carry-over from the 2008-2013 RHNA.**

### **a. Carry-over Calculation**

The December Draft's carry-over calculation begins with the carry-over calculation<sup>2</sup> that HCD includes in its November letter regarding the City's Adopted Element - 6,476 units for low, very-low and extremely low income households. The City then reduces the carry-over by taking credit for affordable housing permitted or constructed during the last planning period without identifying the development projects by name or location. For approximately 738 units of affordable housing the City provides no information about the projects in order for the public to verify the project and the affordability of the sites. Simply referring to the Annual Progress Reports for the years indicated on Table 3-4 does not provide adequate information for the public or HCD to verify these units can be credited against the City's carry-over obligation. For

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<sup>2</sup> The City refers to the calculation of the unmet need that must be accommodated in the current housing element with several different terms: the unmet need and the roll-over. We refer to the same with the term "carry-over." The calculation is completed by determining the RHNA for the applicable income levels for the past planning period, then subtracting the number of units approved or constructed by income level from the RHNA, then subtract the number of sites that could be accommodated on sites identified in the housing element for the previous planning period, then subtract any sites re-zoned to meet the housing needs during the last planning period. See HCD's Memorandum AB1233, Updated June 3, 2010.

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example, when HCD calculated the City's carry-over at 6,476 units, HCD gave the City credit for 1,740 units for the 2008-2013 planning period based on sites identified and available in an inventory in 2008 and 2009 Adopted Housing Elements and for units approved or constructed during the same time frame. It is unclear, and therefore problematic, whether the City is taking credit for some of the same units that HCD has already given the City credit for constructing or approving in its calculation of 6,476 carry-over units.

For the years 2013 to 2015, City takes credit for units approved or constructed and does identify the name of the project along with the number of units by income level. But there are errors in some of total units that indicates these numbers may not be reliable. For example, for 2013 the draft element includes a project called Fultonia West with 34 units affordable for extremely-low or very-low income and 10 units affordable for low income households and one unit affordable to moderate income households. The corresponding 2013 Annual Progress Report lists the Fultonia West development as including 13 units affordable for low income and 19 units affordable for moderate income households. This error, and any others, must be corrected in order to determine whether the City can reduce its carry-over from HCD's 6,476 units.

## **b. Carry-over site specifications**

### **1.Size**

The December draft element correctly re-states the law regarding the specific requirements of site re-zoned to accommodate the unmet need from the prior planning period: the site must allow development by right on a site that can accommodate at least 16 units and permits a density of at least 20 dwelling units to the acre. Fifty percent of the sites must allow only residential use, unless a mixed use site allows 100 percent residential and require that residential use occupy at least 50 percent of the floor space. Government Code § 65583.2(h). The draft element goes on to state on p. 3-27 that six parcels with a capacity of less than 16 units are included in the carry-over inventory. (Appendix B-2) On p. 6-17 of the draft element it states that 7 of the parcels in the carry-over inventory have a capacity for less than 16 units per acre. Notwithstanding the inconsistency between the statements, and a review of Appendix B-3 supports at least 7 parcels with a capacity of less than 16 units, no site with a capacity of less than 16 units per acre can be used to accommodate the unmet housing need from the prior planning period. No exceptions exist in the statute to include sites with a smaller capacity.

### **2.By Right**

Excluding the parcels that do not meet the requirement that sites re-zoned to address the carry-over accommodate at least sixteen units can be accomplished when the draft housing element is modified to incorporate the public comments the City receives prior to submitting the draft to HCD. The more difficult challenge is to demonstrate that all of the carry-over sites allow by right development. By right is typically defined as development that is not required to seek any discretionary approvals. Gov. Code § 65583.2(i). The City's Development Code indicates zone clearance, a ministerial review to determine if a residential development meets all applicable standards, is available for single family homes and single duplexes and all other



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developments must seek a development permit. §15-5203. The development permit process is not a ministerial process and allows for discretionary review of a development.

The Draft Amendment contends in Chapter 3, page 24, that projects subject to the Downtown Development Code (“DDC”) are subject only to a zone clearance process. However, as we explained to the City prior to the City’s adoption of the DDC in correspondence dated October 19, 2016, attached hereto as Exhibit B, the DDC allows projects located in certain areas of the Downtown to obtain zone clearance approvals only if they have a residential density of 20 units per acre, where at least 50% of the floor area is occupied by residential uses and which have no historic uses on site. Government Code section 65583.2(h), however, requires that the City identify sites to meet its carry-over need where *only* projects meeting the requirements established by that section are permitted. The DDC does not meet this standard, because it does not *require* development projects to satisfy the standards contained in section 65583.2(h) on the sites identified but *allows* them to proceed with zone clearance if they do. The distinction between the Government Code’s requirements and the DDC’s provisions is significant: the Government Code requires that the City identify sites where projects must meet the minimum density and development standards and may proceed only subject to a zone clearance in order to ensure that projects that proceed on those sites in fact address the city’s unmet need for housing for lower-income residents from the prior planning period.

### **3.Capacity**

The City's recent modifications increasing permitted densities and height limits in the downtown area are a recent change and there is no development pattern for the City to rely on to support the estimated capacity included for the sites on the carry-over inventory (Appendix B-2). The City relies on the projected capacity of several proposed projects but cannot point to development patterns that support calculating future capacity on the downtown sites at 283 units/acre - Table 3-9, on page 3-24 and 3-25, gives examples of affordable housing in the past that had a build out averaging 18.9 units a floor in a 2 or 3 story development, the new height limits have no track record and assuming that all projects that **can** build out at 10 or 15 stories **will do so** is speculative and not an adequate analysis to support the capacity included in the inventory.

#### **c. Current RHNA Inventory**

##### **1.Underutilized Sites**

Non-vacant parcels are included in both the carry-over inventory and 2013-2023 RHNA inventory as is permitted if the housing element includes a comprehensive analysis of the development potential during the planning period on the non-vacant sites. Gov. Code § 65583.2(g).<sup>3</sup> In the Draft Amendment inventories, the current use of the non-vacant parcels is identified but this falls short of the analysis required by law. As HCD's building blocks explains the analysis must assess whether non-vacant or underutilized sites can be realistically developed

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<sup>3</sup> This analyses is required for all non-vacant sites whether the site is identified to meet the 2015-2023 RHNA or the unmet housing need from the last planning period.

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within the planning period. Further analysis is necessary for sites in both the carry-over and current RHNA inventories to determine whether re-development of these non-vacant sites is realistic during the remaining time in the planning period. The City's inventory include non-vacant parcels that include operating businesses, including a church, and the City must complete the analysis of the specific sites and their realistic development potential and not simply identify what the current use is on the site.

## **2.Site Capacity**

As indicated in previous comment letters the capacity of the City's identified sites to accommodate housing affordable to lower income households is greatly overstated on large sites of over 10 acres in size. The available funding sources and past development patterns do not support affordable residential projects developing at 30 units/acre on thirty acres resulting in 913 affordable units on one site. See parcel 2027 in Inventory B-1, Appendix B. The City uses one example of an affordable residential development on a large site, the proposed Fracher project which will support 440 affordable units on 91 acres on p. 3-15. That results in a development of less than 20 units/acre and does not support the development predictions of other large sites at 30 units/acre and higher. The capacity calculation for large sites, more than 10 acres in size, overstates the actual development capacity because of available financing for affordable housing. On the City's list of TCAC funded projects on p. 4-28, only two of the 34 developments built with tax credits has more than 250 units. The lack of availability of tax credit financing for developments of over 250 units poses limit on the development of large sites for affordable housing. And by including such large sites, which cannot compete the available funding for affordable housing in the inventory, the City has created a constraint on the production of affordable housing.

## **3.Mixed Use Sites**

The Draft Amendment identifies a specifics' that would allow some of the mixed use sites to allow commercial-only development on p. 3-9 (projects less than 20,000 sq. ft, beyond a certain distance to a BRT route, and for projects with a development permit application before 2019). These sites do not belong in the inventory identified to meet residential housing needs, and although the parcels that meet the first two criteria should be somewhat easy to isolate and remove from the B-1 and B-2 inventories, it is unclear how to identify the sites that may submit a development application between now and 2019.

## **4. Governmental Constraints**

The site inventory for the Draft Amendment includes numerous parcels indentified to meet the housing needs of lower income households that are ten acres or greater in size, including parcels over 20 acres in size. The decision to identify sites for affordable housing development that cannot compete for tax credit financing because of the size of the parcels and the number of units on one parcel. This is a constraint on the development of affordable housing that the City has chosen to impose. Because the City is required to identify any governmental constraints on development and remove those constraints, the City must either remove the constraint by identifying parcels for affordable housing that can compete for tax credit financing,

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or adopt a program to commit City funds to develop these sites for affordable housing. All of the sites in the inventory should be suitable and available for residential development within the current planning period, a phasing plan to help large size parcels develop for affordable housing limits the development potential during the current planning period and is an inadequate mitigation to this self-imposed constraint on development.

## **5. The Draft Revisions Exacerbate the Unlawful Concentration of Sites for Affordable Housing in R/ECAPs and Economically Disadvantaged Neighborhoods**

As noted in our previous letters, the high-density sites identified in the Housing Element Sites Inventory to meet the housing needs of lower income households are located almost entirely in, or immediately adjacent to, racially and ethnically concentrated areas of poverty (R/ECAPs) and economically distressed neighborhoods that lack access to essential infrastructure, services, and amenities and that are disproportionately exposed to multiple sources of pollution, and that a revised housing element must include programmatic commitments to rezone sites to higher densities in higher income and higher opportunity areas.. HCD's August 11<sup>th</sup> letter also states that a revised housing element should include a "specific commitment to rezone more housing choices in high opportunity areas."

Nevertheless, the Draft Amendment does nothing to identify or commit the City to rezone sites for affordable housing in high opportunity areas. In fact, the City proposes in the Draft Amendment to meet 100% of its carry-over need with sites located in an R/ECAP, the Downtown. p. 3-26. The City's persistence in refusing to make sites available to meet the need for housing affordable to lower income residents outside of R/ECAPs and low income neighborhoods lacking critical infrastructure and services violates the Housing Element Law's requirement that jurisdictions "[p]romote housing opportunities for all persons" regardless of protected class status. § 65583(c)(5) and other state and federal laws prohibiting housing discrimination. 42 U.S.C. § 2000d; 42 U.S.C. 3601, *et seq.*; Gov. Code §§ 11135, 12900, 65008.

In fact the Draft Amendment's only analysis of racially and ethnically concentrated areas of poverty is to determine that these concentrations of poverty occur in certain areas because of the proximity of these areas to transportation. p.3-31. Although this response is insufficient and fails to assess Fresno's status as the most segregated city in America, the next logical step would be to identify a program, including specific actions, to zone sites and provide incentives for affordable housing development and increase the access to transportation in other areas of the City in order to de-concentrate poverty. **Since the City is currently updating its transportation system network, the City could include a program in a revised Draft Amendment that includes a commitment to analyze the impact of the transportation network on affordable housing opportunities and extend or modify the network as necessary to eliminate transit-related barriers to fair housing identified.**

The City must identify sites or include a program to rezone sites to meet the need for housing affordable to lower-income residents outside of R/ECAPs and economically distressed neighborhoods and in higher income and higher opportunity neighborhoods that currently lack affordable housing options.

## **6. Additional Analysis is Required to Conserve the Existing Housing Stock**

The City has identified numerous efforts to redevelop sites in the downtown area. As an R/ECAP, the Downtown is disproportionately comprised of low, very-low, and extremely-low income residents compared to the City as whole. The Housing Element indicates that lower-income residents face extremely high levels of housing cost burden, including 92.9% of ELI, 82.7% of VLI, and 59.5% of LI renter households. Thus, residents in the Downtown subject to revitalization efforts are extremely vulnerable to price increases resulting from sustained investment in the area by the City. The City's revitalization efforts therefore may give rise to a governmental barrier to affordable housing and must be accompanied by programs in the housing element to prevent the displacement of existing residents and to maintain the existing stock of housing in these neighborhoods. These include but are not limited to implementation of the Anti-Displacement Task Force identified in the Downtown Neighborhoods Communities Plans; requirements that City property sold for private development include housing affordable to ELI, VLI, and LI residents; inclusionary zoning requirements; rent control; and/or other mechanisms to ensure long-term affordability for existing lower-income residents.

## **7. The Draft Revisions Fail to Rectify the Housing Element's Programmatic Deficiencies**

As we explained in previous comments, programs contained in the Housing Element and its various draft iterations lack the specificity and "specific action steps" necessary to demonstrate that those programs will result in beneficial impacts on the City's housing goals within the planning period as required by the Housing Element Law. § 65583(c); HCD's Building Blocks for Effective Housing Elements. HCD's August 11<sup>th</sup> letter states that the Housing Element must include "additional revisions to assure a beneficial impact towards Fresno's goals and objectives" and specifically identifies Program 10A (Mobile Home Parks) and Program 27 (Equitable Communities) as requiring revision. The City's proposed revisions fail to rectify these deficiencies.

### **a. Program 10A - Mobile Home Parks**

The revisions to Program 10A represent a positive but insufficient step towards compliance with the Housing Element Law's beneficial impact requirement. The City's commitment to provide assistance with funding applications should specify a target number of applications with which the City will assist. In addition, instead of simply making a list of organizations that "can assist in the preservation of mobile home units," the City should commit to take specific action itself to facilitate the preservation of these units. This may, for example, take the form of conducting an assessment of housing-related needs in mobile home parks through communications with residents and owners, identifying city, state, federal, and private resources available to address those needs, and identifying actions the City will take to use the resources and policy-options available to it to address those needs.

### **b. Program 16 Requires Action in Response to Survey Results.**

The Draft Amendment includes Program 16 to monitor development on sites identified in the inventory but does not identify any action or commitment that the City will take based on

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the outcome of the survey. For all of the reasons stated above regarding large parcels included in the inventory, it is an important step to monitor the actual development of these sites for affordable housing. However, the housing element must also identify an action the City will take if survey results show that challenges exist to the development of these sites as affordable housing.

**c. Programs Needed to Prevent Displacement Activity.**

The draft element described the comprehensive plans the City is taking to encourage new development in the downtown area. pp. 3-23 to 3-28. As discussed above, these efforts toward revitalization in the downtown area must be paired with efforts to prevent the displacement of existing housing in and around the downtown area not only as a direct result of identifying non-vacant sites in the City's inventory but also due to increased housing costs associated in the surrounding area.

**a. Program 27 – Equitable Communities**

The City's proposed revisions to Program 27 fail to include "specific action steps and timelines" that "assure a beneficial impact" on the City's housing goals, as HCD's August 11<sup>th</sup> letter directed, and in fact would undermine the program's goal of the equitable distribution of housing and investment by eliminating the program components which are most likely to result in a beneficial impact due to the specificity of the actions, outcomes and timelines of those programs. The City must modify its proposed revisions to Program 27 to assure that the program will result in a beneficial impact pursuant to section 65583(c).

**i. The Draft Revisions Do Not Enhance but In Fact Weaken Program 27's Commitment to Facilitate Investment in Older Neighborhoods**

The Draft Revision's modifications relating to public and private investment priorities do not include specific action steps necessary to result in a beneficial impact on the City's goal of investment in older neighborhoods but rather consist of broadly worded proposals not tied to a clear outcome and the elimination of Program 27's strongest commitments.

The first bullet point included under Program 27 in the Draft Revisions states that the City will:

"Publish a General Plan Annual Report every December which will detail the location of public investments...in addition to the location of building permit activity by sector as a metric of private investment."

The Draft Revision's proposal to provide information about the location of investment nor does not act to achieve the stated goal of equitable distribution of housing and investment during the planning period. Gathering information to inform a further action would be relevant, but only gathering information does not result in equitable distribution.

The second bullet point included under Draft Revision Program 27 proposes to, "Establish a General Plan Implementation Committee...to review progress on the priorities established in the General Plan" and states that the "committee will convene in early 2017 and have opportunities to provide recommendations to the City on prioritization of future investments." Again, this bullet point indicates no specific action the City will to achieve the goal of the equitable

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distribution of housing and investment: the formation of a committee which will have “opportunities to provide recommendations” – recommendations which the City may or may not adopt -- does not move toward the attainment of any impact on the city’s housing and investment goals at all.

At the same time, the Draft Revisions would delete the following commitments contained in Housing Element Program 27:

- “Identify areas of high need and target an integrated approach to service provision in those neighborhoods.”
- “Establish written policies and procedures that ensure that infrastructure and public services provisions and code enforcement activities are prioritized for high need areas. Prioritize basic infrastructure improvements like water, sewer, and street lights in high need communities and potential strategies for addressing those needs.”

The Draft Revisions would also eliminate the associated objective, that the City: “Identify high need areas and create a list of infrastructure and public service needs in high need areas and potential strategies by January 2017.”

Unlike other components of Program 27, the commitments and objectives which the Draft Revisions propose to delete identify specific actions and clear outcomes that will achieve a beneficial impact on the distribution of the investment of public resources in Fresno pursuant to an established timeline. The deletion of these commitments coupled with the addition of broadly worded commitments to provide information about the location of investments and form a committee do not assure that Program 27 will result in a beneficial impact on Fresno’s housing goals, but in fact make it less likely to do so.

**ii. The Draft Revisions Do Not Identify Specific Actions that Will Result in a Beneficial Impact on the Equitable Distribution of Housing Opportunity**

HCD’s August 11<sup>th</sup> letter states that Program 27 should “include specific commitment to rezone more housing choices in high opportunity areas.” The Draft Amendment includes no such commitment by the City and in fact, *further exacerbates* the nearly complete concentration of sites included in the Sites Inventory for affordable housing in R/ECAPs and economically distressed neighborhoods. See above. The City must revise the Draft Amendment to include a commitment to rezone sites for multi-family housing affordable to low and very-low income residents outside of low and moderate income and in higher income / opportunity neighborhoods.

The Draft Amendment states that the steps the City will take to expand affordable housing opportunities “[include], but [are] not limited to, supporting owner-initiated zoning and General Plan land use amendments that expand affordable housing opportunities outside of low- and moderate-income areas.” Yet the Draft Revision provides no information about what “support” the City will provide for owner-initiated zoning or land use amendments or any indication that that “support” will result in a beneficial impact on the distribution of affordable housing

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opportunities in Fresno and abdicates the *City's* duty to affirmatively further fair housing to developers. The City itself must take action to create housing opportunities outside of R/ECAPs. Further, historical development patterns in Fresno indicate that market-driven zoning does not further fair housing but rather leads to the lack of diverse housing opportunities for residents across the income spectrum.

The Draft Revisions' statement that the actions the City will take to expand affordable housing opportunities "includ[e], but [are] not limited to" supporting owner-initiated zoning and land use amendments indicates that there are additional but unspecified actions the City may take to this end. The City cannot rely on vague commitments to take unspecified actions to expand affordable housing opportunity but must state the "specific actions" it will take achieve them.

The Draft Amendment include additions to Programs 5 and 8 to include language relating to the expansion of affordable housing opportunities outside of low and moderate income neighborhoods. While these proposed revisions represent a positive step by the City to address HCD's comments with respect to Program 27, they, like the revisions to Program 27, do not assure that they will result in a "beneficial impact" as drafted. Program 5 includes provisions to pursue funding to assist the development and preservation of housing, with an "emphasis on the development mixed-income residential neighborhoods and the expansion of affordable housing opportunities outside of the City's low- and moderate-income areas" but does not identify any objective for the number of units that will be constructed in those areas or timeline to assure that the revision will result in a beneficial impact on the expansion of affordable housing opportunities in the City. The Draft Amendment must be revised to identify specific objectives and timelines for the City's attainment of funding to facilitate the development and preservation of affordable housing in higher income areas.

Draft Amendment Program 8 includes modifications that indicate that program regulations for Home Buyer Assistance limit homebuyers to purchase housing in low and moderate income census tracts in Fresno but state that the City will work with HCD to "explore" the potential for homebuyers to purchase homes outside of those areas. While the addition represents a positive step by the City to consider options to expand affordable housing opportunities within its limits, the Housing Element does not indicate what – if any – potential exists for the City to bypass state funding regulations with respect to the CalHome program and therefore whether the program in fact has the potential to result in a beneficial impact on the expansion of affordable housing opportunities in Fresno. In addition, revised Program 8 does not identify any specific actions the City will take that will result in a beneficial impact on the expansion of affordable housing opportunities in the City, since "exploration" by the City of the possibilities for homebuyers to purchase homes outside of low and moderate income areas will not actually result in the purchase of any homes outside of those areas. To address this deficiency, the City could revise the Draft Amendment to state that the City will pursue funding to support the purchase of a certain number of homes per year in high opportunity census tracts if permitted by HCD regulations and that the City will identify and pursue alternative sources of local, state, and federal funding to meet the objective if not.

Sophia Pagoulatos, Planning Manager

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The City must modify its Draft Revisions to identify and include specific programmatic commitments that will result in the expansion of affordable housing opportunities outside of low and moderate income neighborhoods.

\* \* \* \* \*

Thank you for your attention to our comments. Please contact Ashley Werner at [awerner@leadershipcounsel.org](mailto:awerner@leadershipcounsel.org) or (559) 369-2786 if you would like to find a time to discuss them over the phone or in person.

Sincerely,



Ashley Werner  
Attorney  
Leadership Counsel for Justice &  
Accountability



Valerie Feldman  
Attorney  
Public Interest Law Project





March 6, 2017

Sophia Pagoulatos  
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Fresno, CA 93721

**RE: City of Fresno January 2017 Revised Public Review Draft 2015-2023  
Housing Element Amendment**

Dear Ms. Pagoulatos:

We submit these comments on the City of Fresno's January 2017 Revised Public Review Draft 2015-2023 Housing Element Amendment ("Revised Draft Amendment" or "Revised Draft") on behalf of our clients, Familias Addams por un Mejor Futuro. We provide these comments in order to help the City develop a 2015-2023 Housing Element that substantially complies with state Housing Element Law and other applicable state and federal laws and that expands housing opportunity for all Fresnoans. These comments build upon and supplement previous comment letters we have submitted to the City on its Housing Element and Housing Element Amendment, including but not limited to our comments on the December Draft Amendment dated January 13, 2017 ("January Letter"), enclosed here as, Attachment A, without Exhibits, and July 2016, and should be read in conjunction therewith.

**1. THE INVENTORY REMAINS INADEQUATE TO ACCOMMODATE THE 2015-2023  
RHNA AND THE CARRY-OVER.**

**a. Carry-over Calculation**

The Revised Draft Amendment carry-over calculation begins with the carry-over calculation that HCD included in its corrected findings letter dated November 1, 2016: 6,476 units for low, very-low and extremely low income households. The City then reduces the carry-over by taking credit for affordable housing permitted or constructed during the last planning period as described in HCD's June 3, 2010 memo. The City's final calculation of the remaining carry-over is flawed for two reasons: 1) it includes units with no indication of how the City determined the affordability of the unit for lower income households; and 2) on two occasions the City takes credit for units attributed to a single project on two different dates.

First, the City takes credit against the carry-over for various single family homes approved, permitted or constructed from 2006-2015 without any analysis or indication of the affordability of these homes to lower income households. Therefore, the various single family homes identified in Table 3-4 in the Draft Amendment cannot be used to decrease the remaining carry-over calculation.

Second, some of the units credited against the remaining carry-over total have been double counted. For instance, the Sierra Gateway II development project is listed on Table 3-4 in 2011 with a total of 67 very -low income units and 1 above-moderate income unit. The Sierra Gateway II development project is listed again on Table 3-4 for the year 2013 with 33 very-low income units and 34 low income units. Although there may have been a change in the affordability level of the units in the Sierra Gateway II development, there were not two separate Sierra Gateway II developments each with 67 affordable units. Another example of double counting is the Parc Grove Commons NW project listed on Table 3-4 for 2011 including 75 units affordable to very-low income households and 72 units affordable to low income households. Then, Parc Grove NW is listed on Table 3-4 for 2013 with 121 units affordable to very-low income households and 26 units affordable to low income households. Although there may have been a re-distribution of units based on the level of affordability, the City cannot take credit for the overall number of units twice for a single development.

After removing these units and the single family "affordable" units from Table 3-4 the City can apply a credit of 20 units accommodating very-low income housing needs and 807 units for accommodating low income housing needs to unmet housing need from the prior planning period. The table below illustrates the number of units that the City can take credit for from 2006-2015 after the duplicate project units are subtracted as well as the single family homes without any evidence to demonstrate their affordability level.

		<b>Very-Low</b>	<b>Low</b>
<b>Table 3-4 Total Credits</b>		<b>918</b>	<b>899</b>
<b>Subtract</b>			
Parc Grove NW (2011)		-121	-26
Sierra Gateway II (2011)		-67	
Various Single Family 2006			-21
Various Single Family 2007		-1	-19
Various Single Family 2008		-1	-13
Various Single Family 2009		-8	-13
<b>Corrected Credit Total</b>		<b>720</b>	<b>807</b>

Using the adjusted number of unit credits **the correct remaining carry-over is 4,949 units** - 2,452 units for very-low income households and 2,497 units for low income households.

**b. Inventory to Accommodate the Carry-Over**

**i. Parcels that Accommodate at Least 16 units.**

The Revised Draft Amendment correctly re-states the law regarding the specific requirements of site re-zoned to accommodate the unmet need from the prior planning period: the site must allow development by right on a site that can accommodate at least 16 units and permits a density of at least 20 dwelling units to the acre. Fifty percent of the sites must allow only residential use, unless a mixed use site allows 100 percent residential and requires that residential use occupy at least 50 percent of the floor space. Government Code § 65583.2(h). There is no exception in the statute for sites that can accommodate less than 16 units if they are adjacent to other small sites and the sites in Appendix B-2 that cannot accommodate at least 16 units must be removed from the sites identified to accommodate the carry-over from the prior planning period. The statute is explicit and no exception applies.

**ii. Development Potential of Under-Utilized sites**

For non-vacant sites included in the inventory to met the City's housing needs Government Code Section 65583.2(g) requires that: the city or county shall specify the additional development potential **for each site** within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. Govt. Code Section 65583.2(g).

As HCD's Building Blocks explain, the analysis must assess whether non-vacant or underutilized sites can be realistically developed within the planning period. The inventory in Appendix B-2 includes numerous non-vacant parcels, some with existing business located on the parcels, such as parcel 20 on Appendix B-2 which is a thriving granite supplier on P Street, but the City does not conduct any of analysis required pursuant to Government Code Section 65583.2(g) for any of these sites let alone for each specific site as required by law.

The table below demonstrates that the available inventory to accommodate the unmet housing needs from the prior planning period are not sufficient as the carry-over is 4,949 units and the inventory identified to meet that need can only accommodate 4,071 units. In addition, as

explained in more detail below, the identified inventory in Appendix B-2 falls short because the overstates the capacity for these sites coupled with the lack of by-right development on these sites as required by Government Code Section 65583.2(h).

<b>B-2 Inventory (units)</b>			<b>5541</b>
subtract parcels >16 units			-143
subtract parcels on Underutilized sites w/out analysis			-1327
<b>Available Inventory (units)</b>			<b>4071</b>

### iii. By-Right Development

As stated above, sites identified to accommodate the unmet housing need of the prior planning period must allow development by-right on a site that can accommodate at least 16 units and permits a density of at least 20 dwelling units to the acre. Fifty percent of the sites must allow only residential use, unless a mixed use site allows 100 percent residential and require that residential use occupy at least 50 percent of the floor space. Government Code § 65583.2(h). By right is typically defined as development that is not required to seek any discretionary approvals. Government Code Section 65583.2(i). The City's Downtown Development Code ("DDC") allows projects located in certain areas of the Downtown to obtain zone clearance approvals only if the project has a residential density of 20 units per acre, where at least 50% of the floor area is occupied by residential uses and which have no historic uses on site. The DDC does not meet the standard in Government Code Section 65583.2(h) because the law requires that the City identify sites to address the carry-over where projects must meet the minimum density and development standards and may proceed with discretionary review, the DDC does not require projects to meet the requirements of 65583.2(h) but if they do comply then those projects would be allowed to proceed with a zone clearance.

### iv. Capacity

The City's recent modifications increasing permitted densities and height limits in the downtown area are a recent change and there is no development pattern for the City to rely on to support the estimated capacity included for the sites on the carry-over inventory (Appendix B-2). The City relies on the projected capacity of several proposed projects but cannot point to development patterns that support calculating future capacity on the downtown sites at 283 units/acre. Table 3-9, on page 3-24 and 3-25, gives examples of affordable housing in the past that had a build out averaging 18.9 units a floor in a 2 or 3 story development, the new height

limits have no track record and assuming that all projects that **can** build out at 10 or 15 stories **will do so** is speculative and not an adequate analysis to support the capacity included in the inventory.

**a. Current RHNA Inventory**

**i. Underutilized Sites**

As discussed above, in section 1.b.ii. and as HCD's Building Blocks explain non-vacant sites require an analysis that assesses whether non-vacant or underutilized sites can be realistically developed within the planning period. Further analysis is necessary for sites in both the carry-over and current RHNA inventories to determine whether re-development of these non-vacant sites is realistic during the remaining time in the planning period. The City's inventory include non-vacant parcels that include operating businesses and the City must **complete the analysis of the specific sites** and their realistic development potential and not simply identify what the current use is on the site.

**ii. Site Capacity**

As indicated in previous comment letters the capacity of the City's identified sites to accommodate housing affordable to lower income households is greatly overstated on large sites of over 10 acres in size. Assuming high density development on sites larger than 10 acres is problematic for several reasons: 1) there is no development pattern to support the capacity assumptions the City makes in developing its inventory; 2) the City can only point to one example of affordable housing development on a large site - Fancher Ranch - and that project's density is far below the minimum density for the site; 3) the funding available for affordable housing that is crucial to the successful development of affordable housing is not available for developments with the predicted capacity of the large sites in the inventory; and, 4) the City's own track record of tax credit financing has never supported developments with the projected capacity on the large sites identified for affordable housing in the City's inventory.

The City does not have pattern of development of affordable units on parcels larger than 10 acres, and yet it relies on these size parcels to meet the majority of the residential development affordable to very-low and low-income households. In fact, the City proposes meeting the housing needs of 8,728 lower income households on only 26 large size parcels. The entire inventory intended to meet the RHNA for 2015-2023 has 2,046 sites and the housing needs of 8,728 lower income households are going to be substantially met on 26 of those 2,046 parcels as shown on the table on the top of the next page.<sup>1</sup>

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<sup>1</sup> The chart below contains 27 sites, but one of the Fancher Ranch parcels is only 4 acres in size (A3).

<b>Large parcels</b>	<b>Acres</b>	<b>Expected Capacity (Units)</b>
Fancher Ranch (A3,A4,A5)	91	440
A1891	30.43	913
A27	28.06	842
A1889	25.35	406
A369	24.32	389
A1885	22.57	361
A1874	22.38	358
A385	20.71	331
A1870	20.31	325
A71	20.02	320
A70	19.1	306
A1884	18.79	300
A1893	16.52	496
A371	16.45	263
A1883	14.98	240
A1892	14.57	437
A382	14.57	233
A1872	14.37	229
A378	12.81	205
A1888	11.92	191
A442	11.16	335
A363	10.76	172
A1851	10.65	319
A428	10.57	317
<b>Total</b>		<b>8728</b>

The City points to the Fancher Ranch development as its lone example of affordable housing development for lower income households on a large site. The Fancher Ranch project is proposed to have 440 units on 91 acres of land (Appendix B-1, Sites A3, A4, and A5).

**Although the site for Fancher Ranch indicates a minimum density of 12 units per acre it is developing at a much, much lower density - about 4.5 units/acre. This does not support the development on large parcels at the capacities stated in the Revised Draft Amendment.**

Despite the very low density of the Fancher Ranch project, even if we were to give a more generous potential development capacity of 10 units/acre for the large parcels, the capacity of the 24 large sites, excluding Fancher Ranch sites, the total capacity would be reduced to 4,105 units on these 24 sites. Again, that is using a capacity of 10 units/acre which is indeed generous as

compared to the proposed capacity per acre in the Fancher Ranch project. The table below reflects the reduced capacity on large sites.

<b>Large parcels</b>	<b>Acres</b>	<b>B-1 Expected Capacity (Units)</b>	<b>Reduced/Realistic Capacity</b>
Fancher Ranch (A3,A4,A5)	91	440	
A1891	30.43	913	304
A27	28.06	842	280
A1889	25.35	406	250
A369	24.32	389	240
A1885	22.57	361	223
A1874	22.38	358	224
A385	20.71	331	207
A1870	20.31	325	203
A71	20.02	320	200
A70	19.1	306	191
A1884	18.79	300	188
A1893	16.52	496	165
A371	16.45	263	165
A1883	14.98	240	150
A1892	14.57	437	146
A382	14.57	233	146
A1872	14.37	229	143
A378	12.81	205	128
A1888	11.92	191	119
A442	11.16	335	112
A363	10.76	172	108
A1851	10.65	319	107
A428	10.57	317	106
<b>Total</b>		<b>8728</b>	<b>4105</b>

In addition, two of the sites included in this table, are non-vacant sites and yet the Revised Draft Amendment does not contain the required analysis under Government Code Section 65583.2(g) to justify including these sites in the inventory. The two sites that should be removed, even if a more realistic capacity is calculated for these sites, until an analysis can show that these specific sites have development potential before the end of the planning period are sites A27 (842 units) and A1851 (319 units) on Appendix B-1.

The City's efforts to isolate the majority of affordable housing development on 26 large parcels also greatly limits the available funding that will be available for these potential projects on these identified sites. On the City's list of TCAC funded projects on p. 4-28, only two of the 34 developments built with tax credits had more than 250 units. The lack of availability of tax credit financing for developments of over 250 units poses limit on the development of large sites for affordable housing. And by including such large sites, which cannot compete the available funding for affordable housing in the inventory, the City has created a constraint on the production of affordable housing.

### **iii. Mixed Use Sites**

The Revised Draft Amendment identifies a specific exception that would allow some of the mixed use sites to allow commercial-only development on p. 3-9 (projects less than 20,000 sq. ft, beyond a certain distance to a BRT route, and for projects with a development permit application before 2019). These sites do not belong in the inventory identified to meet residential housing needs, and although the parcels that meet the first two criteria should be somewhat easy to isolate and remove from the B-1 and B-2 inventories, it is unclear how to identify the sites that may submit a development application between now and 2019.

## **2. GOVERNMENTAL CONSTRAINTS**

### **a. Limiting Receipt of Scarce Available Funding**

The site inventory for the draft element includes numerous parcels identified to meet the housing needs of lower income households that are ten acres or greater in size, including parcels over 20 acres in size. The decision to identify sites for affordable housing development that cannot compete for tax credit financing because of the size of the parcels and the number of units on one parcel. This is a constraint on the development of affordable housing that the City has chosen to impose. Because the City is required to identify any governmental constraints on development and remove those constraints, the City must either remove the constraint by identifying parcels for affordable housing that can compete for tax credit financing, or adopt a program to commit City funds to develop these sites for affordable housing. All of the sites in the inventory should be suitable and available for residential development within the current planning period, a phasing plan to help large size parcels develop for affordable housing limits the development potential during the current planning period and is an inadequate mitigation to this self-imposed constraint on development.



**b. Conditional Use Permits for Multi-Family Development**

In addition, during our review of the Revised Draft Amendment, the City Council was scheduled on March 2, 2017 to consider a text amendment to the Development Code that would require a conditional use permit ("CUP") for all multi-family developments in the City in all zoning designations outside of the Downtown Development Area. Apparently the item was pulled from the Council's agenda on March 2, 2017, but certainly a CUP requirement on multi-family development could impose significant costs on multi-family development, delay project processing time, and add layers of additional review and hearings. The City must consider the potential constraint on development this type of requirement would impose and carefully review whether imposing such a requirement would be consistent with the goals and policies the City includes in its Revised Draft Amendment.

**3. THE REVISED DRAFT CONTINUES TO FAIL TO ADDRESS PREVIOUS COMMENTS**

The Revised Draft fails to meaningfully respond to or incorporate comments regarding deficiencies in the Draft Amendment and the Adopted Element that we and other members of the public have previously submitted to the City. In addition, areas requiring improvement described in this letter, the Revised Draft must correct the following deficiencies raised in our January and July Letters and other correspondence to the City:

- Failure to identify and include a commitment to zone sites to meet the need for lower-income housing outside of racially and ethnically concentrated areas of poverty and economically distressed neighborhoods and in high opportunity neighborhoods.
- Failure to analyze or respond to the housing needs of households with special housing needs, including households including undocumented and Limited English Proficient residents,<sup>2</sup> large households, and single-parent households.
- Failure to demonstrate that the programs included in the housing element will achieve beneficial impacts within the planning period through the inclusion of specific action steps and time frames for implementation.
- Failure to address the findings of the 2016 Analysis of Impediments to Fair Housing or the San Joaquin Valley Fair Housing and Equity Assessment, as advised by HCD.

The City must prepare and circulate for public review a further revised draft housing element amendment that addresses the deficiencies raised in previous public comments in order to develop a final housing element that complies with state law.

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<sup>2</sup> The Revised Drafts fails to specifically analyze the housing needs of undocumented residents as required by statute, despite the submission of a letter to the City on the Draft Amendment dated January 12, 2017 signed by approximately 27 residents discussing in detail the housing needs particular to the large undocumented population in Fresno and providing recommendations for actions the City can take to address those needs.

#### **4. REVISED DRAFT PROGRAMS CONTINUE TO LACK CLEAR ACTION STEPS AND TIMELINES TO ENSURE A BENEFICIAL IMPACT**

##### **a. Program 10A - Mobile Home Parks**

We strongly support the inclusion in Revised Draft Program 10A of a commitment by the City to, “Conduct and publish an assessment of housing-related needs in mobile home parks through communications with residents and owners, identifying city, state, federal and private resources to address those needs.” The Revised Draft, however, fails to identify a timeline pursuant to which the assessment will be completed as required. The City must circulate a further revised draft amendment that states a specific timeline for completion of the assessment that will allow the assessment to have a beneficial impact within the planning period through its implementation. § 65583(c). Accordingly, we recommend that the City provide a timeline for completion of the assessment by December 2018, the third year of the housing element planning period, in order to allow the development and adoption of policies and the pursuit of funding identified with sufficient time to actually address housing needs of mobile home park residents during the planning period.

In addition, to ensure that the assessment does not become a planning document that collects dust on city shelves but in fact facilitates a beneficial impact on the city’s housing goals, the Housing Element should commit to share the assessment with the public, city committees and commissions, and the City Council to take feedback and allow adoption and implementation of the assessment and its recommendations.

##### **b. Program 12-A – Downtown Displacement Prevention**

We support the Revised Draft’s inclusion of Program 12-A is a positive step to *identify* the occurrence of and potential policy responses to economic and physical displacement in the Downtown. However, the Program fails to take the crucial step of committing to specific actions that will lead to a beneficial outcome on displacement identified.

Program 12-A states that it will annually gather certain data relating to gentrification and displacement starting in 2018. The collection of data in and of itself will not support the ability of existing residents and small businesses to remain in the Downtown as rents rise, and the Program includes no other action steps tied to timelines. The City must prepare a further revised housing element that incorporates the activities set forth in Downtown Neighborhoods Community Plan Policy 7.12.1 in a manner that ensures that a beneficial impact will be achieved by those actions and tie those actions to specific timelines.

For example, Revised Draft Program 12-A states that Policy 7.12.1 includes an item to “[i]dentify...a set of actions that give displaced persons or businesses the opportunity to remain in the area if they wish to do so.” The Housing Element should include a commitment by the City to identify those actions by a certain deadline and also to adopt and *implement* them also pursuant to a timeline. In addition, the actions identified should aim to *prevent* displacement from occurring at all, rather than solely providing options for residents following displacement

from their homes and business locations. Likewise, the Revised Draft recites an item included in Policy 7.12.1 to “[s]eek...funding for mixed income and affordable housing within the plan area,” including through funding from “any future Enhanced Infrastructure Financing Districts (“EIFD”) formed or a future citywide affordable housing trust fund.” Program 12-A includes no commitment to seek funding from any particular sources or pursuant to any timeline nor does it include any commitment to actually pursue the creation of an EIFD or affordable housing trust fund<sup>3</sup>. Without such commitments with clear timelines and action steps designed to achieve beneficial outcomes, Program 12-A will not actually help ensure that existing residents and business owners may remain Downtown as the City pursues revitalization and the Program will not comply with the Housing Element Law.

**c. Program 16A – State Laws Related to Housing Development**

Revised Draft Program 16A states that the City will “Review Development Code for compliance with State laws by May, 2017” and, “[i]f needed, present findings to the City Council for consideration of any amendments or revisions required by September 2017.” The Housing Element should clarify that the City will provide the public with ample opportunity to provide input on and incorporate said input into the Review, and that the results of the Review shall be shared with the public. Further, as state laws relating to housing development are consistently developing, we advise that the City commit to review the Development Code for legal compliance on an annual basis.

In addition, the City should use its review of the Development Code not just to ensure compliance with emerging state law but also to take public input on and assess opportunities to implement the Housing Element and General Plan goals relating to housing and community-development.

**d. Program 20 – Comprehensive Code Enforcement**

Revised Draft Program 20 states that the City will “develop Task Force recommendations” to improve property conditions, which “includes consideration of a residential rental inspection program...” The City Council adopted a rental inspection program in January. For this commitment to have meaning then and actually have a beneficial impact on rental housing conditions in Fresno, a further revised draft should state that the City will *implement* the residential inspection program and report on the outcomes of implementation in its Annual Housing Element Report to determine the Program’s efficacy and if changes are needed.<sup>4</sup>

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<sup>3</sup> As we have previously informed the City, the City could fund the creation of an Affordable Housing Trust Fund in the short-term with the allocation all or part of the approximately four million dollars per year that it receives from the state as former RDA “boomerang” funds to an Affordable Housing Trust Fund, as do other cities throughout California, rather than funnel 100% of those funds to reserve per current City policy. During this time, the City could examine and pursue long-term funding streams for an AHTF.

<sup>4</sup> Revised Draft Amendment Program 27, Equitable Communities, also includes states that the City will consider a residential rental inspection ordinance and must be revised as described herein.

**5. THE REVISED DRAFT PROGRAMS CONTINUE TO FAIL TO AFFIRMATIVELY FURTHER FAIR HOUSING AS REQUIRED BY GOVERNMENT CODE SECTION 65583(C)(5)**

**a. Program 8 – Home Buyer Assistance**

The Revised Draft inexplicably eliminates language included in the December Draft Amendment committing the City to working with HCD to explore the potential for low-income homebuyers to purchase homes outside of low and moderate income census tracts in Fresno. Absent this language, the Revised Draft includes *no* programmatic commitments to expand homeownership opportunities for lower-income residents and residents of protected classes outside of high poverty neighborhoods and R/ECAPs.

The City must prepare and circulate a revised draft amendment that complies with the City's duty to affirmatively further fair housing opportunities through its programs by including specific programmatic commitments to expand homeownership opportunities for low-income residents of color, with limited English language abilities, immigrants, female-headed households and/or other protected classes. As stated in our January Letter, the City could address this deficiency by including a commitment to "pursue funding to support the purchase of a certain number of homes per year in high opportunity census tracts I permitted by HCD regulations" and "Identify and pursue alternative sources of local, state and federal funding to meet the objective if not." p. 11. In addition, the Housing Element could commit to collaborating with affordable housing and non-profit developers to encourage and facilitate financing acquisition, plan approval and home development for this purpose.

**b. Program 10B – Housing Choice Vouchers**

The Revised Draft Amendment includes a statement that the City will "[d]evelop a recommendation of best practices to target areas for voucher education, such as areas with high-performing schools or areas with high Area Median Income as well as near jobs and transit." It is unclear whether this language means that the City will develop best practices for expanding voucher use in certain areas or that the City will develop best practices for how to select the target areas themselves. The City must circulate a further revised draft housing element which clarifies the City's commitment and identifies a clear timeline pursuant to which it shall be completed. As the expansion of HCV use in high opportunity areas in Fresno requires both an effective plan for achieving expansion as well as the identification of "high opportunity" areas to which expansion shall be targeted, the further revised draft element should specify that the City will examine and provide a recommendation as to best practices for both. In addition, the housing element should clarify that the public shall have the opportunity to review drafts and provide input into the recommendations adopted by the City for the implementation of this program.<sup>5</sup>

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<sup>5</sup> This comment applies to Revised Draft Program 27, which also calls for the City to "[d]evelop a recommendation of best practices to target areas for voucher education." p. 6:28.

**c. Program 27 – Equitable Communities**

**i. Investment in Older Neighborhoods**

Our January Letter explained that the Draft Amendment did not strengthen but actually proposed to weaken the Housing Element’s programmatic commitments to investment in older neighborhoods with the greatest need by eliminating, without explanation, its commitment to:

“[e]stablish written policies and procedures that ensure that infrastructure and public service provisions and code enforcement activities are prioritized for high need areas. Prioritize basic infrastructure improvements like water, sewer, and street lights in high need communities. Create a list of infrastructure and public service needs in high need areas and potential strategies for addressing those needs.”

Yet, the Revised Draft Amendment continues to exclude this commitment contained in the current Housing Element. The formulation and adoption of policies and procedures is necessary to ensure that City resources for infrastructure and services target high need areas. The City should circulate a further revised draft amendment which allows the commitment to remain in the housing element as a targeted and systemic approach to addressing infrastructure allocation disparities in Fresno.

While not a substitute for the commitment to establish policies and procedures to prioritize infrastructure and service provision in high need areas referenced above, we support the inclusion of language in Program 27 stating that the City will annually review the location of infrastructure projects in the City to assess project distribution and that it will identify high need deficient areas by 21. The Revised Draft does not indicate how it will identify infrastructure investments and whether it will include specific information on the location of those investments or if it will only indicate the inclusion of projects in designated Priority Areas included in General Plan Implementation Chapter, Figure IM-1. Figure IM-1’s Priority Areas, such as the “Established Neighborhoods South of Shaw”) include large swaths of the City with dramatic variations in poverty levels, demographics, and infrastructure availability. To serve as an effective tool to address infrastructure deficiencies in high need areas, the City should pinpoint the location of investments in its review and indicate the type and amount of investment made.

**ii. Equitable Distribution of Housing Opportunity**


As the City has cited the unavailability of public transit in higher income neighborhoods as a basis for its failure to zone sites for lower-income housing in high opportunity neighborhoods, our January Letter recommends that the Housing Element comply with its duty to AFFH in part by committing to analyze the impact of the transportation network on affordable housing opportunities and extending or modifying the network as necessary to eliminate transit-related barriers to fair housing identified. In response, the Revised Draft Amendment states that the City will “[a]ssess the interaction between transportation network pathways and affordable sites to identify any barriers to affordable housing and employment access” in 2018.

We appreciate the City's response to our comment. However, by limiting the study to an assessment of the relationship between affordable housing and employment, the commitment fails to respond to the fair housing objective of the comment which seeks the elimination of a City-identified barrier to housing choice outside of high poverty neighborhoods and in areas of opportunity. In order to AFFH in accordance with the City's duty under Housing Element Law and other state and federal laws and not serve as a tool to further entrench existing patterns of racial and economic segregation, a further revised draft should specify that the study will assess interactions between the transportation network and affordable sites with the aim of identifying barriers to fair housing choice, including the availability of housing affordable to lower-income residents in high opportunity neighborhoods (i.e., neighborhoods with high performing schools and comparatively high graduation rates, relatively low-poverty rates, and lower percentages of residents of color, immigrants, non-English language speakers, and other protected classes.)

\* \* \* \* \*

Thank you for your attention to these comments. Ashley Werner will be unavailable until March 15<sup>th</sup>. In her absence, please contact Valerie Feldman at (916) 457-7155 if you would like to find a time to discuss these comments.

Sincerely,



Ashley Werner  
Senior Attorney  
Leadership Counsel for Justice &  
Accountability



Valerie Feldman  
Staff Attorney  
Public Interest Law Project

cc: Paul McDougall, California Department of Housing and Community Development

Appendix B:  
Sites Inventory Table

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TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acres	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environmental Constraints	Infrastructure Constraints
Cap and Trade (Fancher)	31310122	CR	Commercial - Regional	Commercial Regional	4.14	12	16	Based on project	440	Very Low	Mostly vacant, one SF home	BRT Corridors (Non-Vacant Land Infill)	No	No
Cap and Trade (Fancher)	31302101	CR	Commercial - Regional	Commercial Regional	46.84	12	16	Based on project			Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Cap and Trade (Fancher)	31310124	CR	Commercial - Regional	Commercial Regional	40.08	12	16	Based on project			Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Pending Infill Project: Van Ness/Stanislaus	46614203	DTN	Downtown Neighborhood	Downtown Neighborhoods	0.34	NA	NA	Based on Project	70	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: Van Ness/Stanislaus	46614204	DTN	Downtown Neighborhood	Downtown Neighborhoods	0.21	NA	NA	Based on Project			Vacant	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: Van Ness/Stanislaus	46614207	DTN	Downtown Neighborhood	Downtown Cultural Arts District	0.26	NA	NA	Based on Project			Vacant	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: Van Ness/Stanislaus	46614208	DTN	Downtown Neighborhood	Downtown Cultural Arts District	0.17	NA	NA	Based on Project			Vacant	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: 3143 E. Matolian Way	42002015T	PI	Public and Institutional	Public Facility College	3.65	30	45	30	110	Moderate	Vacant on BRT corridor	Existing Neighborhoods North of Shaw	No	No
Pending Infill Project: Blackstone/ Clinton	44409204	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.17	12	16	Based on Project	122	Moderate	Partly vacant site with a one story residence, a one story deferred maintenance residence, a two story vacant dilapidated residence, two one story vacant dilapidated residences, and two one story vacant deferred maintenance commercial (restaurant and tire shop) buildings on the BRT Corridor	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: Blackstone/ Clinton	44409205	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.21	12	16	Based on Project			Partly vacant site with a one story residence, a one story deferred maintenance residence, a two story vacant dilapidated residence, two one story vacant dilapidated residences, and two one story vacant deferred maintenance commercial (restaurant and tire shop) buildings on the BRT Corridor	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: Blackstone/ Clinton	44409213	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	2.64	12	16	Based on Project			Partly vacant site with a one story residence, a one story deferred maintenance residence, a two story vacant dilapidated residence, two one story vacant dilapidated residences, and two one story vacant deferred maintenance commercial (restaurant and tire shop) buildings on the BRT Corridor	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: Blackstone/ Clinton	44409216	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.52	12	16	Based on Project			Partly vacant site with a one story residence, a one story deferred maintenance residence, a two story vacant dilapidated residence, two one story vacant dilapidated residences, and two one story vacant deferred maintenance commercial (restaurant and tire shop) buildings on the BRT Corridor	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: Blackstone/ Clinton	44409217	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.49	12	16	Based on Project			Partly vacant site with a one story residence, a one story deferred maintenance residence, a two story vacant dilapidated residence, two one story vacant dilapidated residences, and two one story vacant deferred maintenance commercial (restaurant and tire shop) buildings on the BRT Corridor	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: Blackstone/ Olive	45206118	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	1.89	12	16	12	23	Moderate	Partly vacant site with one story vacant deferred maintenance commercial building and parking on BRT Corridor	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: JC Penny Stadium, Phase 4	46828101	DTC	Downtown Core	Downtown Central Business District	0.57	30	45	30	17	Moderate	Six story vacant dilapidated building	Downtown (Non-Vacant Land Infill)	No	No
Pending Infill Project: South Stadium, Phase 4	46828445T	DTC	Downtown Core	Downtown Central Business District	2.69	30	45	Based on Project	141	Moderate	Vacant and parking portion of baseball stadium site	Downtown (Non-Vacant Land Infill)	No	No
Underutilized	40306046	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	8.81	16	30	16	162	Above Moderate	partial vacant 1 unit	Existing Neighborhoods North of Shaw	No	No
Underutilized	46706207	DTN	Downtown Neighborhood	Downtown Central Business District	0.17	30	45	30	5	Very Low/Low	parking for building, undeveloped	Downtown (Non-Vacant Land Infill)	No	No
Underutilized	46707404	DTN	Downtown Neighborhood	Downtown Chinatown District	0.17	30	45	30	5	Very Low/Low	boarded up commercial building	Downtown (Non-Vacant Land Infill)	No	No
Underutilized	44923118	NMX	Neighborhood Mixed Use	Downtown Corridor General	2.11	12	16	12	25	Moderate	1 small building and parking and vacant portion	Downtown (Non-Vacant Land Infill)	No	No
Underutilized	47927001	RM-3	Residential Multi-Family, High Density	Residential High Density	4.78	30	45	30	143	Very Low/Low	1 SF unit	DA-1 South (Southwest Growth Area)	No	No
Underutilized	41504441	RMX	Regional Mixed Use	Mixed Use Regional	0.84	30	45	30	25	Very Low/Low	1 story bldg (clinical Lab) parking vacant *	BRT Corridors (Non-Vacant Land Infill)	No	No
Underutilized	41504445	RMX	Regional Mixed Use	Mixed Use Regional	2.45	30	45	30	73	Very Low/Low	parking lot and part vacant	BRT Corridors (Non-Vacant Land Infill)	No	No

TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Underutilized	41845013	RMX	Regional Mixed Use	Mixed Use Regional	0.92	30	45	30	28	Very Low/Low	parking lot	Existing Neighborhoods North of Shaw	No	No
Underutilized	50803006	RMX	Regional Mixed Use	Mixed Use Regional	28.06	30	45	30	842	Very Low/Low	Small building with old batting cages	DA-1 North (West Growth Area North of Clinton)	No	No
Underutilized	50506020	RMX	Regional Mixed Use	Mixed Use Regional	2.84	30	45	30	85	Very Low/Low	1 SF unit	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	45905119S	CMS	Commercial - Main Street	Commercial Main Street	0.29	12	16	12	4	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45904303	CMS	Commercial - Main Street	Commercial Main Street	0.20	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45904336	CMS	Commercial - Main Street	Commercial Main Street	0.20	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45904101	CMS	Commercial - Main Street	Commercial Main Street	0.47	12	16	12	6	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45903304	CMS	Commercial - Main Street	Commercial Main Street	0.14	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45027326	CMS	Commercial - Main Street	Commercial Main Street	0.33	12	16	12	4	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45027112	CMS	Commercial - Main Street	Commercial Main Street	0.24	12	16	12	3	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45226411	CMS	Commercial - Main Street	Commercial Main Street	0.40	12	16	12	5	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45026003T	CMS	Commercial - Main Street	Commercial Main Street	0.21	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45027403	CMS	Commercial - Main Street	Commercial Main Street	0.24	12	16	12	3	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45227417	CMS	Commercial - Main Street	Commercial Main Street	0.82	12	16	12	10	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45211212	CMS	Commercial - Main Street	Commercial Main Street	0.14	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45015516	CMS	Commercial - Main Street	Commercial Main Street	0.45	12	16	12	5	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45125111	CMS	Commercial - Main Street	Commercial Main Street	0.47	12	16	12	6	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45015409T	CMS	Commercial - Main Street	Commercial Main Street	1.03	12	16	12	12	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45204105	CMS	Commercial - Main Street	Commercial Main Street	0.74	12	16	12	9	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45220707	CMS	Commercial - Main Street	Commercial Main Street	0.18	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45228216	CMS	Commercial - Main Street	Commercial Main Street	0.19	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45228217	CMS	Commercial - Main Street	Commercial Main Street	0.19	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45228221	CMS	Commercial - Main Street	Commercial Main Street	0.18	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47704049	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.80	16	30	16	29	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47704052	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.36	16	30	16	6	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47704073T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	8.06	16	30	16	129	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46417306	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.67	16	30	16	11	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46410208T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.44	16	30	16	7	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46410215	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.25	16	30	16	20	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47403054	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	2.83	16	30	16	45	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47403071T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.13	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47403075	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.33	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31302103T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	2.51	16	30	16	40	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31322131	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.30	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31322133	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.32	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46202009	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	4.61	16	30	16	74	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46202029	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	2.46	16	30	16	39	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46218205	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.35	16	30	16	6	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46218211	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.29	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31309122S	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.57	16	30	16	9	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	31309127	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	2.77	16	30	16	44	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	45603055T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	2.08	16	30	16	33	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43032226	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.21	16	30	16	3	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	50506024	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	3.30	16	30	16	53	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506008	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	19.10	16	30	16	306	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	56801020	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	20.02	16	30	16	320	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	47711109ST	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	3.59	16	30	16	58	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No

TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	47711110T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.52	16	30	16	8	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47713112	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.18	16	30	16	3	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47711301	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.79	16	30	16	13	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47711302	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.40	16	30	16	6	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47711303	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.85	16	30	16	14	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47711304	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.93	16	30	16	15	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47713101	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.65	16	30	16	10	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47713102	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.83	16	30	16	13	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47713104	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.19	16	30	16	3	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	31324082	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.99	16	30	16	32	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42406201	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.52	16	30	16	8	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	41820145	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.61	16	30	16	10	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	45603037	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.47	16	30	16	24	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45603039	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.10	16	30	16	18	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45603044	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	5.51	16	30	16	88	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45603048	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	5.33	16	30	16	85	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	40914048	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.36	16	30	16	6	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	40915051	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.71	16	30	16	27	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30306225	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.14	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30305308	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.15	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	42707140	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.32	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	41809118	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	2.34	16	30	16	37	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	45129633	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.27	16	30	16	4	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47217208	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.45	16	30	16	7	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46305029T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.36	16	30	16	6	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46305040T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.13	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	50506008	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	8.43	16	30	16	135	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	31011147	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.06	16	30	16	17	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46305029T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.13	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	50408133	CR	Commercial - Regional	Commercial Regional	6.97	12	16	12	84	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50409111S	CR	Commercial - Regional	Commercial Regional	9.29	12	16	12	111	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50409128S	CR	Commercial - Regional	Commercial Regional	1.33	12	16	12	16	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50409143S	CR	Commercial - Regional	Commercial Regional	3.63	12	16	12	44	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50409145S	CR	Commercial - Regional	Commercial Regional	4.03	12	16	12	48	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	46706338	DTN	Downtown Neighborhood	Business District	0.26	NA	NA	113	29	Very Low/Low	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46706604	DTN	Downtown Neighborhood	Downtown Chinatown District	0.17	NA	NA	113	19	Very Low/Low	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46706615	DTN	Downtown Neighborhood	Downtown Chinatown District	0.22	NA	NA	113	24	Very Low/Low	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46706325	DTN	Downtown Neighborhood	Downtown Chinatown District	0.17	NA	NA	113	20	Very Low/Low	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46706329	DTN	Downtown Neighborhood	Downtown Chinatown District	0.17	NA	NA	113	20	Very Low/Low	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46706334	DTN	Downtown Neighborhood	Downtown Chinatown District	0.43	NA	NA	113	49	Very Low/Low	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46706506	DTN	Downtown Neighborhood	Downtown Chinatown District	0.17	NA	NA	113	19	Very Low/Low	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46706507	DTN	Downtown Neighborhood	Downtown Chinatown District	0.43	NA	NA	113	49	Very Low/Low	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46839055S	DTN	Downtown Neighborhood	Downtown Town Center	0.31	NA	NA	113	35	Very Low/Low	vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46839063	DTN	Downtown Neighborhood	Downtown Town Center	0.24	NA	NA	113	27	Very Low/Low	vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	#####	DTN	Downtown Neighborhood	Downtown South Stadium District	0.07	NA	NA	113	7	Very Low/Low	vacant	Downtown (Non-Vacant Land Infill)	No	No

TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	#####	DTN	Downtown Neighborhood	Downtown South Stadium District	0.08	NA	NA	113	10	Very Low/Low	vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46708517T	DTN	Downtown Neighborhood	Downtown South Stadium District	0.06	NA	NA	113	7	Very Low/Low	vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	#####	DTN-AH	Downtown Neighborhood - Apt. House Overlay	Downtown Neighborhoods	0.25	NA	NA	57	14	Very Low/Low	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47826135	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.69	12	16	12	8	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47825402	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.50	12	16	12	6	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47819122	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.59	12	16	12	7	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47819132	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47818306	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.35	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47818317	NMX	Neighborhood Mixed Use	Downtown Corridor General	2.36	12	16	12	28	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47813406	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.19	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47813407	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.38	12	16	12	5	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47813424	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.23	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47813425	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.16	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46726204T	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.14	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46726201T	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46726202T	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46726203T	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.35	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46712514	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.27	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46727112	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.23	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46727106	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.15	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47104102	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47026219	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.15	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47027305	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.19	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47015133	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.13	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47005301	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.19	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46129331	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.38	12	16	12	5	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46129122	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.14	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46130309	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.31	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46126510	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46126511	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.35	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46126513	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.21	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46126410	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46130217	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.23	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46604311	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.55	12	16	12	7	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46107325	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.16	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46607101	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46032339	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.34	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45932701	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.22	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45932702	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.48	12	16	12	6	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46613124	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.34	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46613125	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.23	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46610332	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.29	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46502002	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.79	12	16	12	9	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No

TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	45932506	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.21	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45931809	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.37	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45930502	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.13	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45935134	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45825012	NMX	Neighborhood Mixed Use	Downtown Corridor General	1.04	12	16	12	12	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45825024T	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.48	12	16	12	6	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45920007	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.19	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45927116	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.14	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45927120	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.13	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45927128	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.14	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46015427T	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.24	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45917326	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.14	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45917340	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.35	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46009125	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.16	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46007105	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.24	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46006203	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.12	12	16	12	1	Moderate	vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46004217	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.39	12	16	12	5	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45908231	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.30	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45908103	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.13	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45907416	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.22	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45811402	NMX	Neighborhood Mixed Use	Downtown Corridor General	3.51	12	16	12	42	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45432414	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.35	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45431327	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.37	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45430325	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.40	12	16	12	5	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45426215	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.14	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45229315	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45230126T	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.19	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45230127T	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.18	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45232415	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45224419	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.35	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45424103	NMX	Neighborhood Mixed Use	Downtown Corridor General	2.12	12	16	12	25	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44932118	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.85	12	16	12	10	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44923127	NMX	Neighborhood Mixed Use	Downtown Corridor General	1.26	12	16	12	15	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44923128	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.51	12	16	12	6	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44923129	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.50	12	16	12	6	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44923134	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.52	12	16	12	6	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44923135	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.51	12	16	12	6	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44209018	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.70	12	16	12	8	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47712101	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.28	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47712102	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.36	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47712104	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.18	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47712105T	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.18	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47712106T	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.19	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47712436	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.65	12	16	12	8	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518613	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.16	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518515	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.16	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47003207	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.42	12	16	12	5	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No

TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	4612721 0T	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.35	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4612721 1T	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.26	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4612721 6T	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.33	12	16	12	4	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4612721 7T	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.28	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651820 8	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.13	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651810 7	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.17	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4602960 9	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.56	12	16	12	7	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4602740 9	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.60	12	16	12	7	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4591022 6	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.21	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4600722 7	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.23	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4600523 9	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.18	12	16	12	2	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4492600 1	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	4.27	12	16	12	51	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4421112 0	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	1.75	12	16	12	21	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4420904 7	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.51	12	16	12	6	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4420904 8	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.69	12	16	12	8	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	3160220 1	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	6.48	12	16	12	78	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4720402 5	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.64	12	16	12	8	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4720402 6	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.64	12	16	12	8	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4720402 7	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.64	12	16	12	8	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4720402 8	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.64	12	16	12	8	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4522240 6	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.17	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4522240 5T	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.17	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4522241 5	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.24	12	16	12	3	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4521460 1	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.20	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4521460 8	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.15	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4521411 7	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.30	12	16	12	4	Moderate	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	4521430 2	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.24	12	16	12	3	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4520620 7	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.13	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4512121 6	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.15	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3123001 2	RE	Residential Estate	Residential Low Density	1.54	0	0.2	0.2	0	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	3120813 6	RE	Residential Estate	Residential Low Density	2.03	0	0.2	0.2	0	Above Moderate	Vacant	DA-4 West (West Growth Area South of Clinton)	No	No
Vacant	5050600 8	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	15.14	12	15	12	182	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5790746 5S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	11.23	12	15	12	135	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5513632 4	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.34	12	15	12	28	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	4170705 8	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	1.86	12	15	12	22	Moderate	vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	4811302 6	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	5.96	12	15	12	71	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4790203 3	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.41	12	15	12	5	Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4790203 5	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	3.97	12	15	12	48	Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4790203 6	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.00	12	15	12	24	Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4790204 3	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	6.48	12	15	12	78	Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4713400 1	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.27	12	15	12	27	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4712200 5	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.96	12	15	12	12	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4710622 9	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4721903 5	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.60	12	15	12	7	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4721903 6	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.60	12	15	12	7	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	472200X B	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.11	12	15	12	25	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4522261 6	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.43	12	15	12	5	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

TABLE D-1: SITES INVENTORY (2015-2025 RMRP)														
Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	45223318	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.32	12	15	12	4	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45223321	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	1.14	12	15	12	14	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45223323	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.35	12	15	12	4	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45224121	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45215522	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.15	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45215512	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.15	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45216513	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.15	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45216514	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.52	12	15	12	6	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45206602	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.15	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45208211	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.18	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45208112	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.18	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45015401T	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.16	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45325112	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.31	12	15	12	4	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45123103	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.16	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44730322	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.31	12	15	12	4	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44730328	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.13	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44409301	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.16	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44409310	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.13	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44409312	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.16	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44408607	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.15	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44408614	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.24	12	15	12	3	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44409110	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.14	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44333623	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.35	12	15	12	4	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44311119	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.15	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43323003	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	1.15	12	15	12	14	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43323006	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.58	12	15	12	7	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	51101257	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	1.87	12	15	12	22	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	43305006	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	1.48	12	15	12	18	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51124033	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	9.58	12	15	12	115	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51124036	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.62	12	15	12	7	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51124037	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	9.74	12	15	12	117	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	43608072	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.40	12	15	12	5	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43608074	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.16	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42629116	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.53	12	15	12	6	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43021007	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.90	12	15	12	11	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43038131	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	1.12	12	15	12	13	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42450126	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	3.66	12	15	12	44	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	41604009	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.68	12	15	12	32	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50922001S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.21	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50921001S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.21	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50936040S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.56	12	15	12	31	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50936041	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.51	12	15	12	30	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50903069S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	4.48	12	15	12	54	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41568526	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.34	12	15	12	4	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41568527	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.34	12	15	12	4	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41568536	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.35	12	15	12	4	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41568538	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.47	12	15	12	6	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No

TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acres	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environmental Constraints	Infrastructure Constraints
Vacant	41502817U	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	6.98	12	15	12	84	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50410404	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50410111	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.26	12	15	12	3	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50410113	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50410104	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50411301S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.14	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50412216S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.35	12	15	12	4	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50411201	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50411120	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.19	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50411121	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.35	12	15	12	4	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50412106S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50412110S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50412309S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50412301S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.17	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50412303S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.23	12	15	12	3	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50302008	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	4.03	12	15	12	48	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40409046	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	8.72	12	15	12	105	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40409047	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	8.32	12	15	12	100	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40303007	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.77	12	15	12	33	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	56703064	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	4.32	12	15	12	52	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57801011	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	4.24	12	15	12	51	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57721079	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	1.87	12	15	12	22	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57909023S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	12.07	12	15	12	145	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57907401S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	13.78	12	15	12	165	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	51125002	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	4.85	12	15	12	58	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50903074S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	8.22	12	15	12	99	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50903069S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	5.57	12	15	12	67	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57909020S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	10.81	12	15	12	130	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	44203007	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.19	12	15	12	26	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50613008S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	5.77	12	15	12	69	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50613009S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.93	12	15	12	11	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50733022ST	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.27	12	15	12	3	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50733025	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.20	12	15	12	2	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50732001	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.70	12	15	12	32	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	44602038	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.47	12	15	12	6	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44602040T	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	4.49	12	15	12	54	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48105003	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	23.18	12	15	12	278	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48110009	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.71	12	15	12	32	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48110010	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	22.79	12	15	12	274	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31329108	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.15	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43517302	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.21	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43517308	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.69	12	15	12	8	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42504215	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.44	12	15	12	5	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42504136	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.34	12	15	12	4	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43402057	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.70	12	15	12	8	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43402006T	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.72	12	15	12	9	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43402077T	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.13	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No



TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	43402081	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	6.00	12	15	12	72	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43303207	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	7.26	12	15	12	87	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	433090024S	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	3.06	12	15	12	37	Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	43526422	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.16	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44201002U	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	1.73	12	15	12	21	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48111005	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	6.27	12	15	12	75	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48111020	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.65	12	15	12	32	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45603034T	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	4.17	12	15	12	50	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	50302011	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	11.20	12	15	12	134	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40720402	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	2.56	12	15	12	31	Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	45409102	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.20	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46312030	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.18	12	15	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47902036	RM-1	Residential Multi-Family, Medium High Density	Residential Medium High Density	0.26	12	15	12	3	Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	48003060	RM-2	Neighborhood	Residential Urban Neighborhood	3.53	16	30	16	57	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	50902035S	RM-2	Neighborhood	Residential Urban Neighborhood	10.76	16	30	16	172	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	47704075ST	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	1.19	16	30	16	19	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47704075ST	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.91	16	30	16	79	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	51002201S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.76	16	30	16	76	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506066	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	1.33	16	30	16	21	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506070	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.45	16	30	16	7	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506074	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	24.32	16	30	16	389	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50613021T	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.54	16	30	16	9	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50613028	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	16.45	16	30	16	263	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50601014T	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.04	16	30	16	65	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50020027S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.81	16	30	16	13	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50020028S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.93	16	30	16	15	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50020029S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	2.04	16	30	16	33	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5004501X	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.59	16	30	16	9	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40402102	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.52	16	30	16	72	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50409117	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	12.81	16	30	16	205	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50409118ST	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.28	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57907401S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	3.34	16	30	16	53	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50903072S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	3.23	16	30	16	52	Very Low/Low	vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	51102301	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	14.57	16	30	16	233	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50409135	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	5.30	16	30	16	85	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50409137	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	8.70	16	30	16	139	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57909022S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	20.71	16	30	16	331	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	51004003	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	1.56	16	30	16	25	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51004004	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.34	16	30	16	5	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51004007	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.25	16	30	16	4	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51004008	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.49	16	30	16	8	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51004009	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.37	16	30	16	6	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51004011	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.37	16	30	16	6	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51004013	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.50	16	30	16	8	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011005	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.49	16	30	16	8	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011006	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.98	16	30	16	16	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011008	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	1.27	16	30	16	20	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No

TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acres	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environmental Constraints	Infrastructure Constraints
Vacant	51011009	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.13	16	30	16	2	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011020	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.17	16	30	16	3	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011024	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.27	16	30	16	4	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011025	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.23	16	30	16	4	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011029	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.28	16	30	16	4	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011030	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.26	16	30	16	4	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011031	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.24	16	30	16	4	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011032	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.49	16	30	16	8	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011033	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.49	16	30	16	8	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011034	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.35	16	30	16	6	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011035	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.43	16	30	16	7	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011037	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.14	16	30	16	2	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51011040	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	0.15	16	30	16	2	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	47904014	RM-3	Residential Multi-Family, High Density	Residential High Density	5.27	30	45	30	158	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47927002T	RM-3	Residential Multi-Family, High Density	Residential High Density	1.02	30	45	30	31	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47927003T	RM-3	Residential Multi-Family, High Density	Residential High Density	1.65	30	45	30	49	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47927004T	RM-3	Residential Multi-Family, High Density	Residential High Density	1.18	30	45	30	35	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47927005T	RM-3	Residential Multi-Family, High Density	Residential High Density	1.02	30	45	30	31	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47927006T	RM-3	Residential Multi-Family, High Density	Residential High Density	1.10	30	45	30	33	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47927016T	RM-3	Residential Multi-Family, High Density	Residential High Density	0.43	30	45	30	13	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47927024T	RM-3	Residential Multi-Family, High Density	Residential High Density	1.01	30	45	30	30	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	30363021	RM-3	Residential Multi-Family, High Density	Residential High Density	1.64	30	45	30	49	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40257008	RM-3	Residential Multi-Family, High Density	Residential High Density	0.74	30	45	30	22	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41816309	RM-3	Residential Multi-Family, High Density	Residential High Density	1.90	30	45	30	57	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41816106S	RM-3	Residential Multi-Family, High Density	Residential High Density	0.79	30	45	30	24	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41816102S	RM-3	Residential Multi-Family, High Density	Residential High Density	0.18	30	45	30	6	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	44909033S	RM-MH	Mobile Home Park	Residential Medium High Density	9.03	12	16	12	108	Moderate	Vacant	DA-4 West (West Growth Area South of Clinton)	No	No
Vacant	51203031	RMX	Regional Mixed Use	Regional Mixed Use	1.67	30	45	30	50	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51203033	RMX	Regional Mixed Use	Regional Mixed Use	0.84	30	45	30	25	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51203037T	RMX	Regional Mixed Use	Regional Mixed Use	0.84	30	45	30	25	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51203038	RMX	Regional Mixed Use	Regional Mixed Use	1.02	30	45	30	31	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51203052	RMX	Regional Mixed Use	Regional Mixed Use	0.71	30	45	30	21	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51203082	RMX	Regional Mixed Use	Regional Mixed Use	10.57	30	45	30	317	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	43619308	RMX	Regional Mixed Use	Regional Mixed Use	0.14	30	45	30	4	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43602210	RMX	Regional Mixed Use	Regional Mixed Use	0.18	30	45	30	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43602228	RMX	Regional Mixed Use	Regional Mixed Use	0.31	30	45	30	9	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42402216	RMX	Regional Mixed Use	Regional Mixed Use	0.60	30	45	30	18	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42402217	RMX	Regional Mixed Use	Regional Mixed Use	0.66	30	45	30	20	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42464010	RMX	Regional Mixed Use	Regional Mixed Use	0.25	30	45	30	8	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	42466002	RMX	Regional Mixed Use	Regional Mixed Use	0.24	30	45	30	7	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	42466004	RMX	Regional Mixed Use	Regional Mixed Use	0.22	30	45	30	7	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	42466005	RMX	Regional Mixed Use	Regional Mixed Use	0.22	30	45	30	7	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	42466007	RMX	Regional Mixed Use	Regional Mixed Use	0.24	30	45	30	7	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	41504449	RMX	Regional Mixed Use	Regional Mixed Use	1.23	30	45	30	37	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41504440	RMX	Regional Mixed Use	Regional Mixed Use	0.85	30	45	30	25	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50803004	RMX	Regional Mixed Use	Regional Mixed Use	5.56	30	45	30	167	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50803005	RMX	Regional Mixed Use	Regional Mixed Use	11.16	30	45	30	335	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No

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Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	41723117	RMX	Regional Mixed Use	Regional Mixed Use	0.19	30	45	30	6	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41724037	RMX	Regional Mixed Use	Regional Mixed Use	1.34	30	45	30	40	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	43814245T	RS-1	Residential Single Family, Extremely Low Density	Residential Low Density	0.56	0.0	1.2	1.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43814127T	RS-1	Residential Single Family, Extremely Low Density	Residential Low Density	1.22	0.0	1.2	1.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	50028001S	RS-1	Residential Single Family, Extremely Low Density	Residential Low Density	1.16	0.0	1.2	1.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40505016	RS-1	Residential Single Family, Extremely Low Density	Residential Low Density	0.96	0.0	1.2	1.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	31020124	RS-1	Residential Single Family, Extremely Low Density	Residential Low Density	1.00	0.0	1.2	1.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31025012	RS-1	Residential Single Family, Extremely Low Density	Residential Low Density	2.97	0.0	1.2	1.2	4	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31208235	RS-1	Residential Single Family, Extremely Low Density	Residential Low Density	2.03	0.0	1.2	1.2	2	Above Moderate	Vacant	DA-4 West (West Growth Area South of Clinton)	No	No
Vacant	40609136	RS-1	Residential Single Family, Extremely Low Density	Residential Low Density	1.08	0.0	1.2	1.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40558032	RS-1	Residential Single Family, Extremely Low Density	Residential Low Density	0.87	0.0	1.2	1.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	47213016	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47213030	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.55	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	40535081S	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40535095S	RS-2	Residential Single Family, Very Low Density	Residential Low Density	2.02	0.0	2.2	2.2	4	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40552309S	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.69	0.0	2.2	2.2	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40606055	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.48	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57814034	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.57	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57814037	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57814039	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.51	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	48149337S	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48149352S	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.47	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48137501S	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48137502S	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48149338S	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48149339S	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	40558026	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40558028	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.46	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40558029	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.50	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40558030	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.57	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40558031	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.57	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40558033	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.51	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40558034	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.59	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40558044	RS-2	Residential Single Family, Very Low Density	Residential Low Density	0.61	0.0	2.2	2.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	48021401	RS-3	Residential Single Family, Low Density	Residential Low Density	0.19	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48021402	RS-3	Residential Single Family, Low Density	Residential Low Density	0.23	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46426040	RS-3	Residential Single Family, Low Density	Residential Low Density	0.23	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46426042	RS-3	Residential Single Family, Low Density	Residential Low Density	0.24	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32625019	RS-3	Residential Single Family, Low Density	Residential Low Density	0.29	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32625020	RS-3	Residential Single Family, Low Density	Residential Low Density	0.17	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32624022	RS-3	Residential Single Family, Low Density	Residential Low Density	0.23	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32624025	RS-3	Residential Single Family, Low Density	Residential Low Density	0.19	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	50526027	RS-3	Residential Single Family, Low Density	Residential Low Density	0.31	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50527004	RS-3	Residential Single Family, Low Density	Residential Low Density	0.30	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50525003	RS-3	Residential Single Family, Low Density	Residential Low Density	0.36	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50208301	RS-3	Residential Single Family, Low Density	Residential Low Density	0.22	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50027015S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.27	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	50208607	RS-3	Residential Single Family, Low Density	Residential Low Density	0.22	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50208608	RS-3	Residential Single Family, Low Density	Residential Low Density	0.26	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50207302	RS-3	Residential Single Family, Low Density	Residential Low Density	0.26	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50207305	RS-3	Residential Single Family, Low Density	Residential Low Density	0.26	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50232015	RS-3	Residential Single Family, Low Density	Residential Low Density	0.73	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50234301S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.38	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50227131S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.26	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50227135S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.46	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50234202S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.33	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50234204S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.33	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40277005	RS-3	Residential Single Family, Low Density	Residential Low Density	0.27	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40277008	RS-3	Residential Single Family, Low Density	Residential Low Density	0.24	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40277011	RS-3	Residential Single Family, Low Density	Residential Low Density	0.32	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40381032	RS-3	Residential Single Family, Low Density	Residential Low Density	0.46	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57720027S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.45	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57819001S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.38	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57819003S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.34	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57801005	RS-3	Residential Single Family, Low Density	Residential Low Density	2.33	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57814041S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.36	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57814042S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.37	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57814043S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.38	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57727027	RS-3	Residential Single Family, Low Density	Residential Low Density	0.53	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57727041	RS-3	Residential Single Family, Low Density	Residential Low Density	0.37	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57727045	RS-3	Residential Single Family, Low Density	Residential Low Density	0.44	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57727046	RS-3	Residential Single Family, Low Density	Residential Low Density	0.34	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57817027	RS-3	Residential Single Family, Low Density	Residential Low Density	0.32	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57817030	RS-3	Residential Single Family, Low Density	Residential Low Density	0.41	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57818030	RS-3	Residential Single Family, Low Density	Residential Low Density	0.37	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57914022S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.29	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57914023S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.28	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57915019S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.50	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57913024S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.30	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57913025S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.32	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57913017S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.34	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57913018S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.34	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57913019S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.30	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57913033S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.28	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57913035S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.30	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57917015S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.35	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57917016S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.34	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57917008S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.50	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57917010S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.32	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57918001S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.43	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57918002S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.43	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57918005S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.37	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57918006S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.41	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57918008S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.47	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**[illegible]

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environmental Constraints	Infrastructure Constraints
Vacant	57927009S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.54	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57927010S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.49	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57927011S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.42	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57927012S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.73	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57926001S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.53	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57926002S	RS-3	Residential Single Family, Low Density	Residential Low Density	0.43	0.2	3.5	0.2	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	46405220	RS-3	Residential Single Family, Low Density	Residential Low Density	1.45	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46427238	RS-3	Residential Single Family, Low Density	Residential Low Density	1.10	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	57907458S	RS-3	Residential Single Family, Low Density	Residential Low Density	25.99	0.2	3.5	0.2	5	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57907459	RS-3	Residential Single Family, Low Density	Residential Low Density	4.10	0.2	3.5	0.2	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	31230032	RS-3	Residential Single Family, Low Density	Residential Low Density	0.20	0.2	3.5	0.2	0	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	46402007	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	10.83	3.5	6.0	3.5	38	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402008	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	1.11	3.5	6.0	3.5	4	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402009	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	1.59	3.5	6.0	3.5	6	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402012	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	4.69	3.5	6.0	3.5	16	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402013	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	4.92	3.5	6.0	3.5	17	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402015	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	18.34	3.5	6.0	3.5	64	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402019	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	9.38	3.5	6.0	3.5	33	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402024	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	2.00	3.5	6.0	3.5	7	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402025	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	24.72	3.5	6.0	3.5	87	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402026	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	5.83	3.5	6.0	3.5	20	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402028	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	7.80	3.5	6.0	3.5	27	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402029	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	9.49	3.5	6.0	3.5	33	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402030	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	9.50	3.5	6.0	3.5	33	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402031	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	9.49	3.5	6.0	3.5	33	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402034	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	4.69	3.5	6.0	3.5	16	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402035	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	1.76	3.5	6.0	3.5	6	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402036	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	9.31	3.5	6.0	3.5	33	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46402037	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	4.55	3.5	6.0	3.5	16	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	57907437S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	9.54	3.5	6.0	3.5	33	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	32813302	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.29	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813303	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813304	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813309	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813313	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813314	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.22	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813204	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813205	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813213	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.17	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813222	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.14	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813226	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.29	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	48150107S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48150108S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48150109S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48143502	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.17	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48143401	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48143402	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.14	3.5	6.0	3.5	0	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

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**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

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**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

[illegible]

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**[illegible]

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	50939010	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.14	3.5	6.0	3.5	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41533131	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.35	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50522058	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.71	3.5	6.0	3.5	2	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50026212S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.29	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50304138S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	4.30	3.5	6.0	3.5	15	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50113410S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.33	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	405111402S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.34	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40547317S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.25	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50206210	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.22	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40258030S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.55	3.5	6.0	3.5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40302209	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	2.30	3.5	6.0	3.5	8	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40355118S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.17	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40355229S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.45	3.5	6.0	3.5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40260215	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.31	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40270101	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.45	3.5	6.0	3.5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40108204	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.20	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724310S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.34	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724311S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.31	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724312S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.31	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724406S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.33	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724407S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.33	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724409S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.33	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724410S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.33	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724411S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.32	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724412S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.43	3.5	6.0	3.5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724414S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.31	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724415S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.30	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724417S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.31	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724418S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.34	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724402S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.33	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57724404S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.33	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57819013S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.24	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57819014S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.27	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57819015S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.22	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57819017S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.26	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57819019S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.38	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57624118S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.28	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57624125S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.26	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57922026S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	2.51	3.5	6.0	3.5	9	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57922027S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	1.37	3.5	6.0	3.5	5	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57907426S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	5.00	3.5	6.0	3.5	17	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57907427S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	5.00	3.5	6.0	3.5	18	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57907431S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	4.79	3.5	6.0	3.5	17	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	579074X1	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.22	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57916037S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.17	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57916040S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.16	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57916041S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.16	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

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**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	48020120	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	1.37	3.5	6.0	3.5	5	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48020121	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.18	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	316192077	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.17	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31619208T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.22	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31382050	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	5.14	3.5	6.0	3.5	18	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31332107	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.45	3.5	6.0	3.5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31380112T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.98	3.5	6.0	3.5	3	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42633123	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.29	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42628102	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.38	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42628103	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.30	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42601003	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	4.49	3.5	6.0	3.5	16	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	42611106	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.41	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48029104	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.14	3.5	6.0	3.5	0	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	41818322	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.23	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41819113T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.37	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40717310	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.21	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	31304018S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	18.61	3.5	6.0	3.5	65	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31304019	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	20.12	3.5	6.0	3.5	70	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31304050	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	19.97	3.5	6.0	3.5	70	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	57728033	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	1.74	3.5	6.0	3.5	6	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40613314S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.13	3.5	6.0	3.5	0	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40613315	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.23	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50419101	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50420106	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.28	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50420107	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.29	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50420108	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.21	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50420116	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.17	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50420117	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.22	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50408115S	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	9.51	3.5	6.0	3.5	33	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50504084	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	16.02	3.5	6.0	3.5	56	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50532101	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.18	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50532102	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50532103	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50532104	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50532105	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50532106	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.16	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50532107	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.22	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50532108	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.24	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	44207132	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	2.07	3.5	6.0	3.5	7	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	44207149	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	2.28	3.5	6.0	3.5	8	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	32813101	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813104	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813110	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.15	3.5	6.0	3.5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32813128	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.52	3.5	6.0	3.5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	31612001	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	1.11	3.5	6.0	3.5	4	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31616033	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	19.80	3.5	6.0	3.5	69	Above Moderate	Vacant	DA-2 South (South of California, East of Fowler)	No	No
Vacant	31616065	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	54.60	3.5	6.0	3.5	191	Above Moderate	Vacant	DA-2 South (South of California, East of Fowler)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	4940810 3T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4940810 4T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4940810 5T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4940810 6T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4940810 7T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4940810 8T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4940810 9T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4940811 0T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4940811 1T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4940811 2T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	0.19	3.5	6.0	3.5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	5790744 9	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	14.97	3.5	6.0	3.5	52	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	3100413 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.11	5	12	5	11	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4782540 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.44	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4782540 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.33	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4782531 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4782523 7	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4782742 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781921 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781830 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.91	5	12	5	5	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781831 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	1.14	5	12	5	6	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781831 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.65	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781810 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781820 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.26	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781821 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.25	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781820 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781823 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781823 7	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781610 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.20	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781610 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781610 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4781610 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.26	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771440 1T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771440 2T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771440 3T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.44	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771440 4T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771440 5T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771440 6T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.22	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771440 9T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771441 2T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.89	5	12	5	4	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771441 3T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.37	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771441 4T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.22	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771441 5T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.37	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771441 6T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.22	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771441 7T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.61	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771441 8T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.40	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771441 9T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.42	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4771442 0T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.42	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**[illegible]

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**[illegible]



**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	4671521 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4671060 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.32	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4702721 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4671541 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4671541 5T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4671540 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.22	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4671541 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4652510 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4702022 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4652151 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651760 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4652160 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4652150 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651750 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651750 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4701313 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.30	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4652130 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.24	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651721 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651721 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651721 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651721 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.35	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651741 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4641220 7	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.36	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651740 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651740 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651742 1T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651742 2T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651951 0	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651951 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651711 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651711 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.26	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651711 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651710 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651651 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.26	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651921 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651930 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4641131 0	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.37	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4641131 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.67	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4641131 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.67	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4641131 3T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4641131 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.25	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4641131 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.54	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4701240 7T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.46	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4701240 9T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.35	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4701330 1T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.55	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4701330 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.18	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4700510 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.23	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	47005115	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.21	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46813116	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47007306	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47015306T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47015307T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.40	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47015308T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47007109	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.24	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518612	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46512503	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46814007	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46814009	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.30	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46814010	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46516112	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46516302T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.24	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46411107	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.18	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518604	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518605	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.23	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518415	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.23	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46516107	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518312	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518108	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518109	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518110	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46512516	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46512517	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46512511	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.37	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46512512	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.53	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518205	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46518103	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46128114	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45822011	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	1.38	5	12	5	7	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45822012	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	1.38	5	12	5	7	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45822025	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.87	5	12	5	4	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	458222028	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.43	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	458222030	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.44	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46123413	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.23	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46123303	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.42	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46130313	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46130314	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46130318	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.23	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46130319	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.21	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46130320	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.21	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45821211	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.22	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45821217	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.30	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45821218	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.20	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45821220	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.38	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45821221	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.25	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	4582122 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.49	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582122 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.47	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582122 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582122 7	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.42	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582122 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.57	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582123 0	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.30	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582123 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	1.14	5	12	5	6	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582123 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.25	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4612241 0	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4612213 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651070 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.25	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651060 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.34	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4651060 7	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.30	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582115 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582115 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582116 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4582117 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4610742 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4602611 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4602820 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593330 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.26	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593332 17	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.24	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4601841 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592840 7	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592842 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.37	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592842 7	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593112 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593031 0	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.20	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593032 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.39	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593032 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.29	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593033 0	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.24	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593023 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.24	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593012 0	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592921 9	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.29	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592820 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592741 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592721 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592540 3	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592540 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592540 5	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592530 6	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.18	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592531 0	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.18	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592531 1	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.18	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592531 2	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592531 8	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4592521 4	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4593221 7	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.18	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	45932218	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.20	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45932103	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.27	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45931401	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45932113	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45922122S	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45814415	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.28	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46010103	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.18	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46010104	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.21	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45917105	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45916401U	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	1.72	5	12	5	9	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45916305	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45916208	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45814404	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816103	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816104	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816106	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.21	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816107	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816112	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816114	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.24	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816116	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816122	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.20	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816123	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816124	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45816128	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.18	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45814108	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.67	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45814110	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.28	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46007419	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45910433	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45914109T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45909322	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46005301	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45910327	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.25	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46005248	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.14	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45812207	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45915319	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45906210	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45812106	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45915215	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45907403	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45813204	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45813205	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45907413U	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	1.59	5	12	5	8	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45431324	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.34	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45230125T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45230130T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45230604	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	454333102	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	45231218	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45428161	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.21	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45233211	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45231101	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45230317	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.63	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44934201	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.27	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44934202	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.27	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44934203	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.30	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44934204	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.47	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44934205	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.23	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45418510	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.22	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45426131	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45426133	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45423334	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45422324	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.59	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45420409	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45420417	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45225224T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45418130	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.13	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45419405	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.18	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45418408	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45418421	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.17	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	45427122	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44926037	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.33	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44902010	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	8.88	5	12	5	44	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44922503	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.44	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44922509	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.40	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44209049	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.50	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44209050	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.61	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	32818101	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.31	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32818108	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.46	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32818110	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.46	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e
Vacant	47915103	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47915112	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.36	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47915117	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47909403	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47902049	RS-5	Residential Single Family, Medium Density	Residential Medium Density	18.87	5	12	5	94	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	48147041	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.56	5	12	5	13	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48147041	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.48	5	12	5	7	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48102060S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	6.39	5	12	5	32	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47713105	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	471130206	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.35	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	471130243	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.57	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	471130245	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.38	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47129108	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.31	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47129111	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.56	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46420011	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46419207	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46417210	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47122045	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.80	5	12	5	4	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47106215	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.29	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47017425	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46404007	RS-5	Residential Single Family, Medium Density	Residential Medium Density	8.91	5	12	5	45	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46404013	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.43	5	12	5	7	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46404039	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.74	5	12	5	4	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46404054	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.58	5	12	5	13	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46404055	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.97	5	12	5	15	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46409236	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.25	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46409239	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.20	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	46220407	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.32	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31327051S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	24.20	5	12	5	121	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45912118	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.43	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45911211	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45903309	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45229134	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.43	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45226206	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45219113	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.34	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45221112	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45220206	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45610007	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45610008	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45610012	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45610013	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45610014	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45610015	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45610016	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45623123	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45021106T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45022201	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

TABLE D-1: SITES INVENTORY (2015-2025 RMRP)														
Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	45020319	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45205111	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45329230	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45329238	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45328106	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.36	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45328124	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.70	5	12	5	4	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45328223	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.64	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45328230	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.19	5	12	5	11	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45122308	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45320101	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.44	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45124226	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45310222	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45312122	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.30	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45305120	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.90	5	12	5	4	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45103107	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45106415	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44624203	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31218025S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-4 West (West Growth Area South of Clinton)	No	No
Vacant	44616422	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44616220	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44411307	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.45	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44412425	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44408514	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44404117T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.37	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44404118	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44403133	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44403134	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44405201	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.73	5	12	5	4	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44405202	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44526327	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31254127	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.41	5	12	5	2	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	31004138	RS-5	Residential Single Family, Medium Density	Residential Medium Density	3.67	5	12	5	18	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44519211	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.37	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44311120	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31253503	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.35	5	12	5	2	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	31253509	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.35	5	12	5	2	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	44507104T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44310217	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31077123	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.27	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31077124T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.41	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44204002	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.70	5	12	5	48	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	44204018	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.20	5	12	5	11	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	43722116	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.38	5	12	5	7	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31075750T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.24	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31075411T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.20	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43321014	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.37	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43709011	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.66	5	12	5	8	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	4370901 5T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.54	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4332200 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.00	5	12	5	5	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4330800 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.84	5	12	5	4	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4330800 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	3.79	5	12	5	19	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4332100 8	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.25	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4332103 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.21	5	12	5	6	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4332103 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.27	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4363301 7	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.91	5	12	5	10	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	5113630 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5113631 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	4330500 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.07	5	12	5	5	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5111712 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.94	5	12	5	25	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	4262911 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.25	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	430231X 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4303913 5	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.95	5	12	5	5	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4301612 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.23	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	5120700 7	RS-5	Residential Single Family, Medium Density	Residential Medium Density	3.02	5	12	5	15	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120702 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.87	5	12	5	4	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120703 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	6.54	5	12	5	33	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120706 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.54	5	12	5	13	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120700 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	17.91	5	12	5	90	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120700 7	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.85	5	12	5	4	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120701 7S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	8.49	5	12	5	42	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120701 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.64	5	12	5	48	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120703 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.30	5	12	5	97	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120704 8	RS-5	Residential Single Family, Medium Density	Residential Medium Density	7.84	5	12	5	39	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120705 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	32.35	5	12	5	162	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120706 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.45	5	12	5	2	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5120706 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	3.64	5	12	5	18	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5081200 6S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.40	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5081201 0S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.42	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5081201 3S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5081202 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.60	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5080820 3S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5080820 9S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.85	5	12	5	4	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5080822 7S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5080823 0S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5080823 3S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	4171512 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.16	5	12	5	6	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	4174001 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.43	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5080701 1S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5080703 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5081020 1ST	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.46	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5081020 2ST	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.23	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5081023 0S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5081012 1S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.43	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	4170705 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.66	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No



**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

TABLE D-1: SITES INVENTORY (2015-2025 RIRNA)														
Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	50902015	RS-5	Residential Single Family, Medium Density	Residential Medium Density	8.14	5	12	5	41	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50902016	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.27	5	12	5	21	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40906072	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.20	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30315201	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.24	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30314419	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30315105	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30315124	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30316147	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30316149	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30316150	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.23	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30316151	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.27	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30316152	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30316153	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30316155	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30314324S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30314102	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30314103	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30314115	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30311216	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30311236	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30311238	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50302009S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	13.74	5	12	5	69	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30312104	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30312133	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30311310	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30311125	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50405005	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.53	5	12	5	48	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50405028	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.11	5	12	5	96	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30309242	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30309245	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.29	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30309231	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30308237	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.42	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30308121	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30307334	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30309171	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30309137	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30308115	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30307343	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30307101	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30307102	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30307108	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30303425	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30305211	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30304231	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.36	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30304242	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30304247	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30303404	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	40408301	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.20	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30305104	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30303110	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30303133	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	30304139	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	303041X1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50207322	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.46	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50208612	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.40	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50208613	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.49	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	50207319	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.43	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40551011S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.51	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40551012S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.46	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40552208S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.46	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40261004	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	40263122	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.53	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57801035	RS-5	Residential Single Family, Medium Density	Residential Medium Density	3.58	5	12	5	18	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57907428S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	7.94	5	12	5	40	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57907429S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	6.48	5	12	5	32	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57929220S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57929116S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57929117S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928301S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928302S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928308S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928309S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928312S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928313S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928314S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928315S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928316S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928317S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928320S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928326S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57907483S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	10.02	5	12	5	50	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928205S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928222S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928224S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928226S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	57928227S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	31074008	RS-5	Residential Single Family, Medium Density	Residential Medium Density	5.29	5	12	5	26	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31074009	RS-5	Residential Single Family, Medium Density	Residential Medium Density	8.72	5	12	5	44	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44913030	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	4.61	5	12	5	23	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44934104	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.25	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44934109	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.23	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44934110	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.24	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44931218	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.23	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	44931228	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.44	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	5790743 2S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	5.03	5	12	5	25	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5790745 4S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	12.69	5	12	5	63	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	3108110 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3108141 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3102805 8	RS-5	Residential Single Family, Medium Density	Residential Medium Density	12.18	5	12	5	61	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3105721 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3107513 7T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.31	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3107720 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3107720 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3107720 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.20	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3120822 4	RS-5	Residential Single Family, Medium Density	Residential Medium Density	12.88	5	12	5	64	Above Moderate	Vacant	DA-4 West (West Growth Area South of Clinton)	No	No
Vacant	3120822 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.24	5	12	5	6	Above Moderate	Vacant	DA-4 West (West Growth Area South of Clinton)	No	No
Vacant	5064704 8S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.08	5	12	5	20	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5064303 2S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5064303 4S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5064303 5S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5064303 6S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5064303 7S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5064303 8S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5061303 1S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.28	5	12	5	46	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5060100 6T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	7.80	5	12	5	39	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5060100 7T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.16	5	12	5	6	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5060100 8T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.81	5	12	5	4	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5061121 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5060761 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5120940 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.39	5	12	5	2	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5050700 5S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.14	5	12	5	6	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5050700 6S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.37	5	12	5	7	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5050704 2S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.15	5	12	5	6	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	4790500 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.53	5	12	5	48	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4790500 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.57	5	12	5	8	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4790500 8	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.57	5	12	5	8	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772001 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772001 5	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772002 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772005 1T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772005 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772210 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.23	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772120 4	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.31	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772221 8	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772225 4	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772225 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772226 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4772227 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.28	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4771920 5	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.30	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4771920 7S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	4771920 8S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e
Vacant	47719401	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.30	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47719403	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.31	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47719102S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.37	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47719310	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.36	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47719313	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47721109	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.36	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47721115	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47713316	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47713418	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47713419	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47711405	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47711411	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47711207	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.62	5	12	5	3	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47711208	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.23	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47711210	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47706003	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	9.53	5	12	5	48	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47706004T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	4.17	5	12	5	21	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47716111	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.36	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718101	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.38	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718102	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.20	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718103	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.20	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718104	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.20	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718105S	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.21	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718106	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.31	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718107	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.41	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718112	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718202	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.41	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718203	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.41	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718205	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.15	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718207	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.19	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718212	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.23	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718217	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.47	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47718219	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.30	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	48109024	RS-5	Residential Single Family, Medium Density	Residential Medium Density	5.79	5	12	5	29	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48109026	RS-5	Residential Single Family, Medium Density	Residential Medium Density	3.86	5	12	5	19	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48112004	RS-5	Residential Single Family, Medium Density	Residential Medium Density	17.22	5	12	5	86	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31281417	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	31281418	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	31218048S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.27	5	12	5	1	Above Moderate	Vacant	DA-4 West (West Growth Area South of Clinton)	No	No
Vacant	48012012	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.20	5	12	5	6	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48012016	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.52	5	12	5	8	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47320037	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	47320038	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48102047	RS-5	Residential Single Family, Medium Density	Residential Medium Density	38.05	5	12	5	190	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31379825	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.32	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31306007	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.53	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31306008	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.67	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	31306009	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.48	5	12	5	7	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31306010	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.95	5	12	5	15	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31306011	RS-5	Residential Single Family, Medium Density	Residential Medium Density	3.23	5	12	5	16	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31381028	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.18	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31380111	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.38	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43516225	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43533301	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43524209	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43524210	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	43530307	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	45028037	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.35	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	43309021S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.21	5	12	5	11	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	47811328	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.42	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	48035231	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.37	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48035314	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.51	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48032110	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.16	5	12	5	6	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48003018	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.96	5	12	5	5	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48003035	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.90	5	12	5	9	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48024504	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	41809131	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41809134	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41809135	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41809136	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41826212	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	32916201	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.34	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916206	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916218	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.41	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916220	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916222	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32920038	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916106	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.34	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916118	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.35	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916121	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.40	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916123	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.99	5	12	5	5	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916124	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.50	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916143	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.48	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32916145	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32816310	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32817201	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.27	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32817208	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.22	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32816118	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32815021	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.49	5	12	5	2	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32817105	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.17	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32817127	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32818506	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32818203	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.24	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	42805005T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.83	5	12	5	9	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	4810803 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.75	5	12	5	24	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4540330 17	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.26	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4540422 8	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.47	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4540542 8	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.50	5	12	5	2	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4562412 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.66	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4532240 7	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.26	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4532231 4	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.23	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4532231 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.25	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3132705 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	1.61	5	12	5	8	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	3132807 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	59.44	5	12	5	297	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	408153X 54	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.62	5	12	5	3	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5100224 4	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.88	5	12	5	4	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5100212 9S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	8.76	5	12	5	44	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5100213 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	8.47	5	12	5	42	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5103110 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	3.72	5	12	5	19	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	4631810 4	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4631711 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4630231 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.88	5	12	5	14	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4064521 9S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.26	5	12	5	1	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	5105140 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105140 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105140 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105140 4	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105140 5	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105140 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105140 7	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.25	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105140 8	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.21	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105140 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.25	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105141 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105141 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105141 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105142 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105142 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105142 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5100302 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.67	5	12	5	13	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105130 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.15	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105130 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105130 3	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105130 4	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105130 5	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105130 6	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105130 7	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105130 8	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105130 9	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.19	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105131 0	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.16	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105131 1	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.13	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	5105131 2	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.14	5	12	5	1	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**[illegible]

TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	4700810 3T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.36	16	30	16	6	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4700810 4T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.14	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4700810 5T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.14	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4700810 6T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.37	16	30	16	6	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4740306 6	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	6.75	16	30	16	108	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4740307 2	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	9.85	16	30	16	158	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4740307 8	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	8.46	16	30	16	135	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4632522 OS	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.67	16	30	16	11	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4632522 1S	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.98	16	30	16	32	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4630601 7	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	2.42	16	30	16	39	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4270812 0	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.79	16	30	16	13	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4251721 7	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.69	16	30	16	11	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4251721 8	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.80	16	30	16	13	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4280903 0	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.00	16	30	16	16	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	4091910 5	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.19	16	30	16	3	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	4091910 6	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.19	16	30	16	3	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	4091910 7	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.19	16	30	16	3	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	4091910 8	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.19	16	30	16	3	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	4091910 9	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.19	16	30	16	3	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	3030620 8	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.14	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	3030620 9	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.14	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	3030621 0	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.14	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	3030541 7	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.14	16	30	16	2	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	3030541 8	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.28	16	30	16	4	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	4721611 2	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.31	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4721611 3	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.31	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4721611 4	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.32	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4721710 1	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.31	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4721710 2	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.31	16	30	16	5	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4720215 8T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.98	16	30	16	32	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4720216 0T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.56	16	30	16	25	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4720216 1T	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	1.83	16	30	16	29	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4632320 7	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.56	16	30	16	9	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4630401 7	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.67	16	30	16	11	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4630504 3	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	5.09	16	30	16	81	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4250910 3	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.34	16	30	16	6	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4700520 1T	NMX	Neighborhood Mixed Use	Downtown Corridor General	0.29	12	16	12	3	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4700520 2T	NMX	Neighborhood Mixed Use	Downtown Corridor General	2.85	12	16	12	34	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4700312 1	NMX	Neighborhood Mixed Use	Downtown Neighborhood Center	0.47	12	16	12	6	Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	4431822 2	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.25	12	16	12	3	Moderate	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	4431020 1	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.12	12	16	12	1	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4431020 2	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.12	12	16	12	1	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4431020 3	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.12	12	16	12	1	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4431020 4	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	0.13	12	16	12	2	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	4240220 2	RMX	Regional Mixed Use	Mixed Use Regional	7.70	30	45	30	231	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	4173422 3	RMX	Regional Mixed Use	Mixed Use Regional	10.65	30	45	30	319	Very Low/Low	Mostly Vacant, small comm. use on large lot	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	4180808 2	RMX	Regional Mixed Use	Mixed Use Regional	2.36	30	45	30	71	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No



TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	41808083	RMX	Regional Mixed Use	Mixed Use Regional	1.47	30	45	30	44	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41808085	RMX	Regional Mixed Use	Mixed Use Regional	1.81	30	45	30	54	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41808086	RMX	Regional Mixed Use	Mixed Use Regional	1.55	30	45	30	47	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41808087	RMX	Regional Mixed Use	Mixed Use Regional	1.31	30	45	30	39	Very Low/Low	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	41806044	RMX	Regional Mixed Use	Mixed Use Regional	2.51	30	45	30	75	Very Low/Low	Vacant	BRT Corridors (Non-Vacant Land Infill)	No	No
Vacant	47005203T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.26	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47005409T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.51	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47005410T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.26	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47005411T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.25	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47005412T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.33	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47005413T	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.33	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	47003206	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.68	5	12	5	3	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46813103	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.31	5	12	5	2	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46813104	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	46813105	RS-5	Residential Single Family, Medium Density	Downtown Neighborhoods	0.16	5	12	5	1	Above Moderate	Vacant	Downtown (Non-Vacant Land Infill)	No	No
Vacant	32610065	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	8.87	16	30	16	142	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	50506068	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	5.15	16	30	16	82	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506017	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	20.31	16	30	16	325	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506039	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	0.85	16	30	16	14	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506040	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	14.31	16	30	16	229	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506067	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	9.20	16	30	16	147	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50803014	CMX	Corridor/Center Mixed Use	Mixed Use Corridor/Center	22.38	16	30	16	358	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	31602201	NMX	Neighborhood Mixed Use	Mixed Use Neighborhood	10.32	12	16	12	124	Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	32808002	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	9.88	16	30	16	158	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32808003	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.74	16	30	16	76	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47703030S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.71	16	30	16	75	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47703030S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	9.73	16	30	16	156	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	477030328	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	9.68	16	30	16	155	Very Low/Low	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	31616052	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.73	16	30	16	76	Very Low/Low	Vacant	DA-2 South (South of California, East of Fowler)	No	No
Vacant	31616053	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	2.32	16	30	16	37	Very Low/Low	Vacant	DA-2 South (South of California, East of Fowler)	No	No
Vacant	31602221	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	14.98	16	30	16	240	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31020103	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	18.77	16	30	16	300	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	51204317S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	22.57	16	30	16	361	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204318	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.96	16	30	16	79	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204319	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.95	16	30	16	79	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50508029S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	11.92	16	30	16	191	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	31002086S	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	25.35	16	30	16	406	Very Low/Low	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	51021004	RM-2	Residential Multi-Family, Urban Neighborhood	Residential Urban Neighborhood	4.72	16	30	16	76	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506007	RMX	Regional Mixed Use	Mixed Use Regional	30.43	30	45	30	913	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506016S	RMX	Regional Mixed Use	Mixed Use Regional	14.57	30	45	30	437	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506019	RMX	Regional Mixed Use	Mixed Use Regional	16.52	30	45	30	496	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506036	RMX	Regional Mixed Use	Mixed Use Regional	2.34	30	45	30	70	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506037	RMX	Regional Mixed Use	Mixed Use Regional	3.93	30	45	30	118	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	50506038	RMX	Regional Mixed Use	Mixed Use Regional	2.30	30	45	30	69	Very Low/Low	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	31327045	RS-3	Residential Single Family, Low Density	Residential Low Density	28.85	0.2	3.5	0.2	6	Above Moderate	Vacant	DA-2 North (North of 180, East of Clovis)	No	No
Vacant	31602221	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	21.82	4	6	4	76	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	46406013	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	3.69	4	6	4	13	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**[illegible]

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

[illegible]

TABLE B-1 SITES INVENTORY (2013-2023 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	47702119	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	17.07	4	6	4	60	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47702120	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	34.23	4	6	4	120	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47702124T	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	1.07	4	6	4	4	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47702125	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	7.06	4	6	4	25	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	44207123	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	4.71	4	6	4	16	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	31005223	RS-4	Residential Single Family, Medium Low Density	Residential Medium Low Density	23.61	4	6	4	83	Above Moderate	Vacant	DA-2 North (North of 180, East of Clovis)	No	No
Vacant	32808001S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	18.80	5	12	5	94	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32808002	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.81	5	12	5	49	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32808003	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.79	5	12	5	49	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32808004S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	18.79	5	12	5	94	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32808005	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.68	5	12	5	98	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32808006	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.68	5	12	5	98	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32808007	RS-5	Residential Single Family, Medium Density	Residential Medium Density	11.10	5	12	5	56	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	32808009	RS-5	Residential Single Family, Medium Density	Residential Medium Density	6.66	5	12	5	33	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47902029	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.50	5	12	5	47	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47703015	RS-5	Residential Single Family, Medium Density	Residential Medium Density	14.85	5	12	5	74	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47703019	RS-5	Residential Single Family, Medium Density	Residential Medium Density	3.77	5	12	5	19	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47703030S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	28.05	5	12	5	140	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47703003	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.25	5	12	5	1	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47703004	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.35	5	12	5	97	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	31602221	RS-5	Residential Single Family, Medium Density	Residential Medium Density	34.78	5	12	5	174	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44908006	RS-5	Residential Single Family, Medium Density	Residential Medium Density	6.68	5	12	5	33	Above Moderate	Vacant	DA-4 West (West Growth Area South of Clinton)	No	No
Vacant	31004102	RS-5	Residential Single Family, Medium Density	Residential Medium Density	46.46	5	12	5	232	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31004107	RS-5	Residential Single Family, Medium Density	Residential Medium Density	12.10	5	12	5	61	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	51204323	RS-5	Residential Single Family, Medium Density	Residential Medium Density	28.69	5	12	5	143	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204324	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.78	5	12	5	24	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204325	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.78	5	12	5	24	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204326	RS-5	Residential Single Family, Medium Density	Residential Medium Density	40.94	5	12	5	205	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204328	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.11	5	12	5	96	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204329T	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.11	5	12	5	96	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204312S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.12	5	12	5	96	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204313S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.13	5	12	5	96	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204314	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.14	5	12	5	96	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204315	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.57	5	12	5	48	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204316	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.57	5	12	5	48	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204317S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	5.79	5	12	5	29	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204318	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.61	5	12	5	23	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204319	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.62	5	12	5	23	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204320	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.63	5	12	5	23	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204321	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.64	5	12	5	23	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51204322	RS-5	Residential Single Family, Medium Density	Residential Medium Density	4.65	5	12	5	23	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	51202126	RS-5	Residential Single Family, Medium Density	Residential Medium Density	####	5	12	5	601	Above Moderate	Vacant	DA-1 North (West Growth Area North of Clinton)	No	No
Vacant	57801024S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	7.73	5	12	5	39	Above Moderate	Vacant	Existing Neighborhoods North of Shaw	No	No
Vacant	31002029	RS-5	Residential Single Family, Medium Density	Residential Medium Density	76.63	5	12	5	383	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31002085S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	25.24	5	12	5	126	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	31002088S	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.86	5	12	5	14	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48109027	RS-5	Residential Single Family, Medium Density	Residential Medium Density	0.99	5	12	5	5	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No

**TABLE B-1 SITES INVENTORY (2013-2023 RHNA)**

Site Type	APN	Zone Code	Zoning	General Plan	Acre s	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Minimum Capacity	Affordability Level	Existing Use	Development Area	Environment al Constraints	Infrastructur e Constraints
Vacant	48109028	RS-5	Residential Single Family, Medium Density	Residential Medium Density	31.04	5	12	5	155	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48112003	RS-5	Residential Single Family, Medium Density	Residential Medium Density	19.50	5	12	5	97	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	48008005	RS-5	Residential Single Family, Medium Density	Residential Medium Density	17.85	5	12	5	89	Above Moderate	Vacant	Existing Neighborhoods South of Shaw	No	No
Vacant	44202243	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.63	5	12	5	48	Above Moderate	Vacant	DA-4 West (West Growth Area South of Clinton)	No	No
Vacant	32805043	RS-5	Residential Single Family, Medium Density	Residential Medium Density	2.84	5	12	5	14	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No
Vacant	47904019	RS-5	Residential Single Family, Medium Density	Residential Medium Density	9.85	5	12	5	49	Above Moderate	Vacant	DA-1 South (Southwest Growth Area)	No	No

TABLE B-2 SITES INVENTORY (2008-2013 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acres	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Estimated Capacity	Affordability Level	Existing Use	Development Area	Environmental Constraints	Infrastructure Constraints	
CapTrade_HotelFresno	46621401	DTC	Downtown Core	Downtown Central Business District	0.52	NA	NA	Based on Project	29	Very Low/Low	Empty Historic Hotel	Downtown	No	No	
CapTrade_HotelFresno	same	DTC	Downtown Core	Downtown Central Business District		NA	NA	Based on Project	11	Moderate	Empty Historic Hotel	Downtown	No	No	
CapTrade_HotelFresno	same	DTC	Downtown Core	Downtown Central Business District		NA	NA	Based on Project	39	Above Moderate	Empty Historic Hotel	Downtown	No	No	
Pending Infill Project: H & Inyo (T. Frazier)	46828607	DTN	Downtown Neighborhood	Downtown South Stadium District	0.17	NA	NA	Based on Project	70	Very Low/Low	Older warehouses	Downtown	No	No	
Pending Infill Project: H & Inyo (T. Frazier)	46828608	DTN	Downtown Neighborhood	Downtown South Stadium District	0.60	NA	NA	Based on Project			Older warehouses	Downtown	No	No	
Pending Infill Project: H & Inyo (T. Frazier)	46828609	DTN	Downtown Neighborhood	Downtown South Stadium District	0.17	NA	NA	Based on Project			Older warehouses	Downtown	No	No	
Pending Infill Project: H & Inyo (T. Frazier)	46828610	DTN	Downtown Neighborhood	Downtown South Stadium District	0.17	NA	NA	Based on Project			Older warehouses	Downtown	No	No	
Pending Infill Project: H & Inyo (T. Frazier)	46828612	DTN	Downtown Neighborhood	Downtown South Stadium District	0.26	NA	NA	Based on Project			Older warehouses	Downtown	No	No	
Pending Infill Project: North Mall	46615312	DTC	Downtown Core	Downtown Central Business District	0.41	NA	NA		283	116	Very Low/Low	Offices Community Comm and parking	Downtown	No	No
Pending Infill Project: North Mall	46615315	DTC	Downtown Core	Downtown Central Business District	0.52	NA	NA		283	147	Very Low/Low	Offices Community Comm and parking	Downtown	No	No
Pending Infill Project: North Mall	46620650T	DTC	Downtown Core	Downtown Central Business District	1.32	NA	NA		283	374	Very Low/Low	Offices Community Comm and parking	Downtown	No	No
Pending Infill Project: North Mall	46621113T	DTC	Downtown Core	Downtown Central Business District	0.48	NA	NA		283	136	Very Low/Low	Offices Community Comm and parking	Downtown	No	No
Pending Infill Project: North Ma	46620656T	DTC	Downtown Core (w ground floor comm.)	Downtown Central Business District	1.40	NA	NA		0	0	Very Low/Low	Offices Community Comm and parking	Downtown	No	No
Pending Infill Project: North Ma	46615314	DTC	Downtown Core (w ground floor comm.)	Downtown Central Business District	0.55	NA	NA		0	0	Very Low/Low	Offices Community Comm and parking	Downtown	No	No
Pending Infill Project: North Ma	46615318	DTC	Downtown Core (w ground floor comm.)	Downtown Central Business District	0.65	NA	NA		0	0	Very Low/Low	Offices Community Comm and parking	Downtown	No	No
Pending Infill Project:M & Inyo(Cityowned)	46821220T	DTG	Downtown General	Downtown Central Business District	0.74	NA	NA		189	139	Very Low/Low	Vacant	Downtown	No	No
Underutilized	46816707	DTG	Downtown General	Downtown Central Business District	1.78	NA	NA		189	336	Very Low/Low	parking lot	Downtown	No	No
Underutilized	46819230	DTG	Downtown General	Downtown Central Business District	0.85	NA	NA		189	161	Very Low/Low	commercial - granite supplier	Downtown	No	No
Underutilized	46608121	DTN	Downtown Neighborhood	Downtown Neighborhoods	0.52	NA	NA		113	58	Very Low/Low	parking and unimproved vacant lot	Downtown	No	No
Underutilized	46613403	DTN	Downtown Neighborhood	Downtown Cultural Arts District	0.13	NA	NA		113	15	Very Low/Low	empty commercial building	Downtown	No	No
Underutilized	46706606	DTN	Downtown Neighborhood	Downtown Chinatown District	0.86	NA	NA		113	98	Very Low/Low	older commercial strip witha church	Downtown	No	No
Underutilized	46708518	DTN	Downtown Neighborhood	Downtown South Stadium District	0.44	NA	NA		113	49	Very Low/Low	empty industrial bldg	Downtown	No	No
Underutilized	46711114	DTN	Downtown Neighborhood	Downtown Chinatown District	1.04	NA	NA		113	117	Very Low/Low	older commercial strip w empty shops	Downtown	No	No
Underutilized	46828606	DTN	Downtown Neighborhood	Downtown South Stadium District	0.43	NA	NA		113	49	Very Low/Low	older commercial industrial bldg	Downtown	No	No
Underutilized	46829207	DTN	Downtown Neighborhood	Downtown South Stadium District	0.75	NA	NA		113	84	Very Low/Low	car storage	Downtown	No	No
Underutilized	46509436U	DTN	Downtown Neighborhood	Downtown Central Business District	2.93	NA	NA		113	331	Very Low/Low	industrial building	Downtown	No	No
Underutilized	46811417	DTN-AH	Downtown Neighborhood - Apt. House Overlay	Downtown Neighborhoods	0.51	NA	NA		57	29	Very Low/Low	older comm industrial bldg	Downtown	No	No
Vacant	46620526	DTC	Downtown Core	Downtown Central Business District	0.46	NA	NA		283	129	Very Low/Low	Vacant	Downtown	No	No
Vacant	46620529	DTC	Downtown Core	Downtown Central Business District	0.43	NA	NA		283	121	Very Low/Low	Vacant	Downtown	No	No
Vacant	46825402	DTC	Downtown Core	Downtown Central Business District	0.43	NA	NA		283	122	Very Low/Low	Vacant	Downtown	No	No
Vacant	46621417T	DTC	Downtown Core	Downtown Central Business District	1.28	NA	NA		283	362	Very Low/Low	Vacant	Downtown	No	No
Vacant	46611308	DTG	Downtown General	Downtown Central Business District	0.59	NA	NA		189	111	Very Low/Low	Vacant	Downtown	No	No
Vacant	46816609	DTG	Downtown General	Downtown Central Business District	0.56	NA	NA		189	106	Very Low/Low	Vacant	Downtown	No	No
Vacant	46819222	DTG	Downtown General	Downtown Central Business District	0.14	NA	NA		189	27	Very Low/Low	Vacant	Downtown	No	No
Vacant	46819227	DTG	Downtown General	Downtown Central Business District	0.12	NA	NA		189	22	Very Low/Low	Vacant	Downtown	No	No
Vacant	46819236	DTG	Downtown General	Downtown Central Business District	0.06	NA	NA		189	11	Very Low/Low	Vacant	Downtown	No	No
Vacant	46819237	DTG	Downtown General	Downtown Central Business District	0.19	NA	NA		189	35	Very Low/Low	Vacant	Downtown	No	No
Vacant	46826111	DTG	Downtown General	Downtown Central Business District	0.17	NA	NA		189	33	Very Low/Low	Vacant	Downtown	No	No
Vacant	46826117	DTG	Downtown General	Downtown Central Business District	0.17	NA	NA		189	33	Very Low/Low	Vacant	Downtown	No	No
Vacant	46826202	DTG	Downtown General	Downtown Central Business District	0.15	NA	NA		189	28	Very Low/Low	Vacant	Downtown	No	No
Vacant	46826203	DTG	Downtown General	Downtown Central Business District	0.15	NA	NA		189	28	Very Low/Low	Vacant storage use	Downtown	No	No
Vacant	46826209	DTG	Downtown General	Downtown Central Business District	0.17	NA	NA		189	31	Very Low/Low	Vacant	Downtown	No	No
Vacant	46826520	DTG	Downtown General	Downtown Central Business District	0.42	NA	NA		189	79	Very Low/Low	Vacant	Downtown	No	No
Vacant	46819213T	DTG	Downtown General	Downtown Central Business District	0.15	NA	NA		189	28	Very Low/Low	Vacant	Downtown	No	No
Vacant	46819214T	DTG	Downtown General	Downtown Central Business District	0.30	NA	NA		189	57	Very Low/Low	Vacant	Downtown	No	No
Vacant	46819534T	DTG	Downtown General	Downtown Central Business District	2.13	NA	NA		189	403	Very Low/Low	Vacant	Downtown	No	No
Vacant	46822212T	DTG	Downtown General	Downtown Central Business District	0.30	NA	NA		189	57	Very Low/Low	Vacant	Downtown	No	No
Vacant	46822215T	DTG	Downtown General	Downtown Central Business District	0.26	NA	NA		189	49	Very Low/Low	Vacant	Downtown	No	No
Vacant	46822216T	DTG	Downtown General	Downtown Central Business District	0.34	NA	NA		189	65	Very Low/Low	Vacant	Downtown	No	No
Vacant	46835036S	DTG	Downtown General	Downtown Central Business District	0.42	NA	NA		189	79	Very Low/Low	Vacant	Downtown	No	No
Vacant	46607406	DTN	Downtown Neighborhood	Downtown Neighborhoods	0.34	NA	NA		113	39	Very Low/Low	Vacant	Downtown	No	No
Vacant	46608122	DTN	Downtown Neighborhood	Downtown Neighborhoods	0.34	NA	NA		113	38	Very Low/Low	Vacant	Downtown	No	No
Vacant	46613213	DTN	Downtown Neighborhood	Downtown Cultural Arts District	0.26	NA	NA		113	29	Very Low/Low	Vacant	Downtown	No	No
Vacant	46613328	DTN	Downtown Neighborhood	Downtown Cultural Arts District	0.30	NA	NA		113	34	Very Low/Low	Vacant	Downtown	No	No
Vacant	46613333	DTN	Downtown Neighborhood	Downtown Cultural Arts District	0.25	NA	NA		113	28	Very Low/Low	Vacant	Downtown	No	No
Vacant	46613402	DTN	Downtown Neighborhood	Downtown Cultural Arts District	0.13	NA	NA		113	15	Very Low/Low	Vacant	Downtown	No	No
Vacant	46613418	DTN	Downtown Neighborhood	Downtown Cultural Arts District	0.17	NA	NA		113	19	Very Low/Low	Vacant	Downtown	No	No

TABLE B-2 SITES INVENTORY (2008-2013 RHNA)

Site Type	APN	Zone Code	Zoning	General Plan	Acres	Zoning Min. Density	Zoning Max. Density	Density Used for Capacity	Estimated Capacity	Affordability Level	Existing Use	Development Area	Environmental Constraints	Infrastructure Constraints
Vacant	46619602	DTN	Downtown Neighborhood	Downtown Cultural Arts District	0.35	NA	NA	113	40	Very Low/Low	Vacant	Downtown	No	No
Vacant	46706312	DTN	Downtown Neighborhood	Downtown Central Business District	0.26	NA	NA	113	29	Very Low/Low	Vacant	Downtown	No	No
Vacant	46706335	DTN	Downtown Neighborhood	Downtown Central Business District	0.14	NA	NA	113	16	Very Low/Low	Vacant	Downtown	No	No
Vacant	46706344	DTN	Downtown Neighborhood	Downtown Central Business District	0.27	NA	NA	113	31	Very Low/Low	Vacant	Downtown	No	No
Vacant	46706611	DTN	Downtown Neighborhood	Downtown Chinatown District	0.17	NA	NA	113	19	Very Low/Low	Vacant	Downtown	No	No
Vacant	46707202	DTN	Downtown Neighborhood	Downtown Chinatown District	1.21	NA	NA	113	137	Very Low/Low	Vacant	Downtown	No	No
Vacant	46707411	DTN	Downtown Neighborhood	Downtown Chinatown District	0.17	NA	NA	113	20	Very Low/Low	Vacant	Downtown	No	No
Vacant	46707412	DTN	Downtown Neighborhood	Downtown Chinatown District	0.34	NA	NA	113	39	Very Low/Low	Vacant	Downtown	No	No
Vacant	46708110	DTN	Downtown Neighborhood	Downtown South Stadium District	0.17	NA	NA	113	19	Very Low/Low	Vacant	Downtown	No	No
Vacant	46708111	DTN	Downtown Neighborhood	Downtown South Stadium District	0.17	NA	NA	113	19	Very Low/Low	Vacant	Downtown	No	No
Vacant	46708208	DTN	Downtown Neighborhood	Downtown South Stadium District	0.13	NA	NA	113	15	Very Low/Low	Vacant	Downtown	No	No
Vacant	46708212	DTN	Downtown Neighborhood	Downtown South Stadium District	0.30	NA	NA	113	34	Very Low/Low	Vacant	Downtown	No	No
Vacant	46708504	DTN	Downtown Neighborhood	Downtown South Stadium District	0.17	NA	NA	113	19	Very Low/Low	Vacant	Downtown	No	No
Vacant	46708510	DTN	Downtown Neighborhood	Downtown South Stadium District	0.19	NA	NA	113	21	Very Low/Low	Vacant	Downtown	No	No
Vacant	46708515	DTN	Downtown Neighborhood	Downtown South Stadium District	0.17	NA	NA	113	19	Very Low/Low	Vacant	Downtown	No	No
Vacant	46708516	DTN	Downtown Neighborhood	Downtown South Stadium District	0.35	NA	NA	113	40	Very Low/Low	Vacant	Downtown	No	No
Vacant	46710202	DTN	Downtown Neighborhood	Downtown Chinatown District	0.34	NA	NA	113	39	Very Low/Low	Vacant	Downtown	No	No
Vacant	46710305	DTN	Downtown Neighborhood	Downtown Chinatown District	0.21	NA	NA	113	23	Very Low/Low	Vacant	Downtown	No	No
Vacant	46710306	DTN	Downtown Neighborhood	Downtown Chinatown District	0.22	NA	NA	113	25	Very Low/Low	Vacant	Downtown	No	No
Vacant	46712112	DTN	Downtown Neighborhood	Downtown South Stadium District	0.15	NA	NA	113	17	Very Low/Low	Vacant	Downtown	No	No
Vacant	46712113	DTN	Downtown Neighborhood	Downtown South Stadium District	0.12	NA	NA	113	13	Very Low/Low	Vacant	Downtown	No	No
Vacant	46712115	DTN	Downtown Neighborhood	Downtown South Stadium District	0.13	NA	NA	113	15	Very Low/Low	Vacant	Downtown	No	No
Vacant	46712117	DTN	Downtown Neighborhood	Downtown South Stadium District	0.20	NA	NA	113	23	Very Low/Low	Vacant	Downtown	No	No
Vacant	46828601	DTN	Downtown Neighborhood	Downtown South Stadium District	0.16	NA	NA	113	18	Very Low/Low	Vacant	Downtown	No	No
Vacant	46829205	DTN	Downtown Neighborhood	Downtown South Stadium District	0.41	NA	NA	113	46	Very Low/Low	Vacant	Downtown	No	No
Vacant	46829206	DTN	Downtown Neighborhood	Downtown South Stadium District	0.08	NA	NA	113	9	Very Low/Low	Vacant	Downtown	No	No
Vacant	46614214T	DTN	Downtown Neighborhood	Downtown Neighborhoods	0.22	NA	NA	113	25	Very Low/Low	Vacant	Downtown	No	No
Vacant	46614215T	DTN	Downtown Neighborhood	Downtown Neighborhoods	0.26	NA	NA	113	29	Very Low/Low	Vacant	Downtown	No	No
Vacant	46707316T	DTN	Downtown Neighborhood	Downtown South Stadium District	0.60	NA	NA	113	68	Very Low/Low	Vacant	Downtown	No	No
Vacant	46708226T	DTN	Downtown Neighborhood	Downtown South Stadium District	0.60	NA	NA	113	68	Very Low/Low	Vacant	Downtown	No	No