



2019-2020 Annual Action Plan Substantial Amendment 2019-06 and COVID-19 Amendment to the Citizen Participation Plan

U.S. Department of Housing and Urban Development
Community Planning and Development Programs

Planning and Development Department
Housing and Community Development Division
2600 Fresno Street, Room 2065
Fresno, CA 93721
559-621-8300
HCDD@fresno.gov

February 18, 2021

Contents

Document Revisions.....	3
Summary	3
Sources of Reprogrammed Funds.....	4
Uses of Programmed Funds.....	5
Emergency Shelter Operations and Supportive Services	5
Medical Clinics	5
Tenant/Landlord Counseling	5
Homeless Facility Acquisition/Rehabilitation	5
Program Administration and Compliance.....	6
Timeliness Requirements and Contingent Activities	6
Integrated Data and Information System (IDIS) Project Information	7
Amendment to the 2020-2024 Citizen Participation Plan	10
Citizen Participation Plan.....	12
Introduction	12
Definitions	12
Roles, Responsibilities, and Contact Information	14
Citizen Participation Policies	14
Public Hearings	14
Notice of Hearings and Review Periods	15
Comments on Adopted Plans	16
Availability of Draft and Approved Documents	16
Displacement Policy	16
Technical Assistance	16
Development of the Fair Housing Study (AI or successor study)	17
Appendix A: Notices and Public Outreach.....	18
Appendix B: Public Comments and City Responses	24

Document Revisions

The Council of the City of Fresno adopted this document with the following amendments, which have been incorporated into this revised document.

- Reduce CDBG-CV funds for Fresno Housing Authority Homekey sites by \$1,332,385 to be used for the acquisition and rehabilitation of hotel and motel sites.

Summary

The City of Fresno (City) is a federal entitlement community that receives annual allocations of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). The City is required to prepare an Annual Action Plan detailing the uses of entitlement funds to meet its affordable housing and community development goals as outlined in its Consolidated Plan.

For program year 2019-2020, the City is proposing to make a substantial amendment to its submitted plan. The purpose of the substantial amendment is to allocate supplement CDBG allocations identified as CDBG-CV1 and CDBG-CV3, which the City received as part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). The supplemental funds will be used by the City and its subrecipients to provide and administer emergency shelter, tenant/landlord counseling, and support for new medical clinics to prevent, prepare for, and respond to the coronavirus. This effort is in alignment with the City's 2020-2024 Consolidated Plan priorities to:

- Provide assistance for the homeless and those at risk of becoming homeless through safe low-barrier shelter options, housing first collaborations, and associated supportive services.
- Provide services to low-income and special needs households that develop human capital and improve quality of life.
- Provide services to residents and housing providers to advance fair housing.
- Plan and administer funding for community development, housing, and homelessness activities with improved transparency, increased community involvement, and full compliance with federal regulations.

As part of the CARES Act passed by the U.S. Congress and signed into law by the President on March 27, 2020, HUD has issued guidance to allow for remote citizen participation and shortened public comment periods for substantial amendments during the coronavirus (COVID-19) pandemic. The City is revising its Citizen Participation Plan to add these provisions for substantial amendments during the COVID-19 pandemic. These provisions were previously added to the City's 2015-2019 Citizen Participation Plan, which expired on June 30, 2020, and are now being added to the 2020-2024 Citizen Participation Plan in light of the continuing need to expedite funding for critical services and allow for the public to participate remotely.

Sources of Reprogrammed Funds

Substantial Amendment 2019-06 will program \$7,980,086 of new CDBG funding allocated to the City to prevent, prepare for, and respond to the Coronavirus.

Table 1 - Source of Programmed Funds

Entitlement Grant	Program Year	Eligible Uses	Amount to Be Programmed
CDBG-CV1	2019	Expenditures are constrained to eligible CDBG activities undertaken to prevent, prepare for, and respond to the coronavirus (COVID-19)	\$4,184,132
CDBG-CV3 ¹	2019		\$3,795,954
Total Sources to Be Programmed:			\$7,980,086

¹ CDBG-CV2 was allocated to States only
January 28, 2021

Uses of Programmed Funds

The City is proposing to utilize \$7,980,086 for homeless, homelessness prevention, public services, and administrative activities. Additional detail is provided in the tables and narrative below.

Table 2: Uses of Programmed Funds

Entitlement Grant	Program Year	Action Plan Project	IDIS Activity ID Number	Activity Name	Proposed Funding
CDBG	2019	26	TBD	Emergency Shelter Operations & Supportive Services	\$3,709,115
CDBG	2019	27	TBD	Medical Clinics/Facility Investments	\$671,300
CDBG	2019	28	TBD	Medical Clinic Operations	\$671,300
CDBG	2019	29	TBD	Tenant/Landlord Counseling	\$480,000
CDBG	2019	30	TBD	Program Administration and Compliance	\$1,115,986
CDBG	2019	31	TBD	Homeless Facilities	\$1,332,385
Total Uses of Programmed Funds:					\$7,980,086

Emergency Shelter Operations and Supportive Services

CDBG-CV funds will be used to support approximately 387 newly added emergency shelter beds with supportive services and shelter operations. The below breakdown represents the current estimation for these investments, however funds may be reallocated between sites based on the timing of conversion to permanent housing.

- \$ 2,045,115 CDBG-CV funds will be used for emergency shelter operations and supportive services at Fresno Housing Authority (FH) locations operated as emergency shelters representing 327 beds, which will allow FH to leverage approximately \$24 million in State funding to acquire sites to be operated as emergency shelters with the goal of ultimately converting them into permanent affordable housing. Locations include²:
 - Days Inn at 1101 N Parkway Drive
 - Welcome Inn, at 777 N Parkway Drive
- \$1,664,000 CDBG-CV funds will be used for emergency shelter operations and supportive services at a 60-bed emergency shelter site acquired by the City of Fresno using additional CARES Act funds.

Medical Clinics

\$1,342,600 CDBG-CV funds will be used to support new medical clinics in underserved neighborhoods through the provision of:

- Acquisition and/or improvements: \$671,300
- Operating costs: \$671,300

Tenant/Landlord Counseling

\$480,000 CDBG-CV funds will be used to provide counseling to assist tenants and landlords for individuals impacted by the Coronavirus

Homeless Facility Acquisition/Rehabilitation

\$1,332,385 CDBG-CV funds will be used for the acquisition, conversion, and/or rehabilitation of facilities to be used as temporary shelters and/or transitional housing for the homeless.

² The following locations were also awarded Homekey funding but are not utilizing City of Fresno federal entitlement funding for operations: Motel 99, at 1240 & 1280 N. Crystal Ave.; Parkside Inn, at 1415 W. Olive Ave.
January 28, 2021

Program Administration and Compliance

\$1,115,986 CDBG-CV funds will be used for grant administration to comply with all applicable regulations while expediting the implementation of services and investments to prevent, prepare for, and respond to the coronavirus (COVID-19).

Timeliness Requirements and Contingent Activities

The ultimate goal of the City of Fresno and the Fresno Housing Authority is to convert the new emergency shelters into permanent affordable housing. The funding allocations in the amendment, along with other sources of funding, are estimated to be sufficient to operate the shelters through December 2024. In order to ensure that the objectives of this funding are met, the City will assess the expenditures according to the schedule below and will reassign unexpended funds to other emergency shelter activities in order to prevent and address homelessness.

Table 3: Schedule of Emergency Shelter Expenditures

Site	Total CDBG-CV funds to be expended by:				
	12/31/2022	6/30/2023	12/31/2023	6/30/2024	12/31/2024
Fresno Housing Authority Shelters	\$417,400	\$867,100	\$1,316,800	\$1,783,200	\$2,045,115
City of Fresno Shelter	\$536,700	\$1,100,300	\$1,664,000		

Integrated Data and Information System (IDIS) Project Information

Table 4: IDIS Entry - Emergency Shelter Operations and Supportive Services

IDIS Field	IDIS Entry
IDIS Project ID Number	26
Project Name	COVID-19 Emergency Shelter Operations and Supportive Services
Target Area	Citywide
Goals Supported	Homeless and Homelessness Prevention
Needs Addressed	Homelessness
Funding	CDBG-CV: \$3,709,115
Description	<p>CDBG-CV funds will be used to support approximately 387 newly added emergency shelter beds with supportive services and shelter operations. The below breakdown represents the current estimation for these investments, however funds may be reallocated between sites based on the timing of conversion to permanent housing.</p> <ul style="list-style-type: none"> \$2,045,115 - emergency shelter operations and supportive services at Fresno Housing Authority (FH) locations operated as emergency shelters representing 327 beds \$1,664,000 - emergency shelter operations and supportive services at a 60-bed emergency shelter site acquired by the City of Fresno
Target Date	12/2024
Goal Indicators	1,099 persons assisted
Location Description	Citywide
Planned Activity	03T: Homeless/AIDS Patients Programs

Table 5: IDIS Entry – Medical Clinics/Services

IDIS Field	IDIS Entry
IDIS Project ID Number	27
Project Name	Medical Clinics Facility Improvements
Target Area	Low and moderate-income neighborhoods
Goals Supported	Public Infrastructure and Facilities
Needs Addressed	Public Infrastructure and Facilities
Funding	CDBG-CV: \$671,300
Description	Investments in TBD medical clinic to prevent, prepare for, and respond to the Coronavirus
Target Date	12/2021
Goal Indicators	41,290 persons assisted (area benefit)
Location Description	TBD
Planned Activity	03P: Health Facilities

Table 6: IDIS Entry – Medical Clinics/Services

IDIS Field	IDIS Entry
IDIS Project ID Number	28
Project Name	Medical Clinics/Operations
Target Area	Low and moderate income neighborhoods
Goals Supported	Community Services
Needs Addressed	Community Services
Funding	CDBG-CV: \$671,300
Description	Operating costs for medical clinics in underserved neighborhoods to prevent, prepare for, and respond to the Coronavirus
Target Date	12/2021
Goal Indicators	1,947 persons assisted
Location Description	TBD
Planned Activity	05M: Health Services

Table 7: IDIS Entry - Tenant/Landlord Counseling

IDIS Field	IDIS Entry
IDIS Project ID Number	29
Project Name	COVID-19 Tenant/Landlord Counseling
Target Area	Citywide
Goals Supported	Community Services
Needs Addressed	Community Services
Funding	CDBG-CV: \$480,000
Description	Counseling to assist tenants and landlords for individuals impacted by the Coronavirus.
Target Date	12/2023
Goal Indicators	780 persons assisted
Location Description	Citywide
Planned Activity	05K: Tenant/Landlord Counseling

Table 8: IDIS Entry - Administration and Compliance

IDIS Field	IDIS Entry
IDIS Project ID Number	30
Project Name	COVID-19 Administration and Compliance
Target Area	Citywide
Goals Supported	Compliance
Needs Addressed	Programmatic Compliance
Funding	CDBG-CV: \$1,115,986
Description	Grant administration to comply with all applicable regulations while expediting the implementation of services and investments to prevent, prepare for, and respond to the coronavirus (COVID-19).
Target Date	12/2026
Goal Indicators	Not applicable to IDIS technical entry; Stated goal: Full compliance with all applicable regulations (Federal, State, Local, and HUD)
Location Description	2600 Fresno Street, Fresno, CA 93721
Planned Activity	21A: Program Administration and Compliance

Table 9: IDIS Entry – Homeless Facilities

IDIS Field	IDIS Entry
IDIS Project ID Number	31
Project Name	Homeless Facilities
Target Area	Citywide
Goals Supported	Homeless and Homelessness Prevention
Needs Addressed	Homeless and Homelessness Prevention
Funding	CDBG-CV: \$1,332,385
Description	Acquisition, conversion, and/or rehabilitation of facilities to be used as temporary shelters and/or transitional housing for the homeless.
Target Date	12/2024
Goal Indicators	716 persons assisted
Location Description	Citywide
Planned Activity	03C: Homeless Facilities (not operating costs)

Amendment to the 2020-2024 Citizen Participation Plan

In response to the Coronavirus (COVID-19) Pandemic, HUD has issued guidance and waivers for Citizen Participation Plans. In response, jurisdictions are required to revise their Citizen Participation Plans to adopt requirements for Substantial Amendments to Consolidated Plans (including Annual Action Plans). The two waivers are:

- **Citizen Participation Public Comment Period for Consolidated Plan Amendment (including Annual Action Plan)**
 - Through the end of the recipient's 2020 program year, the 30-day minimum for the required public comment period (CFR 91.505(c)(2)) is waived for Substantial Amendments. Grantees must provide no less than 5 days for public comments on each Substantial Amendment. The City of Fresno's 2020 program year ends on June 30, 2021.
- **Citizen Participation Reasonable Notice and Opportunity to Comment**
 - HUD waives 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 to allow grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

The City will make the following changes to its 2020-2024 Citizen Participation Plan. These changes were previously adopted in the 2015-2019 Citizen Participation Plan which expired on June 30, 2020.

1. COVID-19 Substantial Amendments will be specifically defined in the 'definitions' section to clarify which amendments are subject to the 5-day Public Comment period. The definition is provided below.

COVID-19 Substantial Amendment: A Substantial Amendment to a Consolidated Plan or Annual Action Plan made for Program Year 2019 to enable expending of funds to prevent, prepare for, and respond to the coronavirus (COVID-19) either specifically allocated through and authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) passed by the U.S. Congress and signed into law by the President on March 27, 2020, or which include the programming or reprogramming of other entitlement funds to prevent, prepare for, and respond to the coronavirus (COVID-19).

2. The 'Notice of Hearing and Review Periods' section will be revised to indicate the following:
 - a. The City will establish a 5-day minimum public review period for Substantial Amendments made during a declared COVID-19 State of Emergency or for COVID-19 Substantial Amendments.
 - b. Substantial Amendments will be made available on the website of the Housing and Community Development Division at <http://www.fresno.gov/housing>.
 - c. In the event that City Hall, Fresno County Libraries, or City Neighborhood and Community Centers are closed to the Public due to a local, state, or federal order, the requirement to post notices at these locations will be waived, and the City will instead distribute the notices through digital channels to include at least two internet-based communication platforms maintained by City of Fresno Public Affairs, such as Facebook or Twitter.
 - d. In the event that a Public Hearing will be conducted remotely, the public notice will include

information instructing the Public how to acquire specific technical instructions for participation.

3. The 'Public Hearings' section will be revised to indicate the following:
 - a. In the event that the City is unable to allow in-person citizen participation at a Public Hearing due to a local, state, or federal order, a Public Hearing may be conducted with remote citizen participation. Remote Citizen Participation options must include at a minimum a method for Citizens to listen to the Public Hearing, submit comments verbally by phone, and submit comments in writing or verbally using an internet application on an internet-enabled device.

4. The 'Availability of Draft and Approved Documents' section will be revised to indicate that:

In the event that City Hall, Fresno County Libraries, or City Neighborhood and Community Centers are closed to the Public due to a local, state, or federal order, the requirement to distribute documents at these locations will be waived.

Citizen Participation Plan

Introduction

The City of Fresno (City) is a federal entitlement jurisdiction that receives federal grant funding from the U.S. Department of Housing and Urban Development (HUD).

The City of Fresno receives federal entitlement grant funding for the following program:

- Community Development Block Grants (CDBG)
- HOME Investment Partnership Program (HOME)
- Housing Opportunities for People with AIDS (HOPWA)
- Emergency Solutions Grants (ESG)

As an entitlement jurisdiction, the City is required to prepare a:

- Five Year Consolidated Plan (Consolidated Plan)
- Annual Action Plan (Action Plan)
- Annual Consolidated Annual Performance Evaluation Report (CAPER)

Under HUD's Code of Final Regulations for the Consolidated Plan (24 CFR Part 91 Sec. 91.105), the City must adopt a Citizen Participation Plan (CPP) that sets forth the City's policies and procedures for citizen participation in the planning, execution, and evaluation of the Consolidated Plan, Action Plans, and CAPER. This CPP provides guidelines for the City to provide and encourage public participation by residents, community stakeholders, and grant beneficiaries in the process of drafting, implementing, and evaluating the Consolidated Plan and related documents. The citizen participation process includes outreach, public hearings, community forums, and opportunities for comment.

Definitions

- **Annual Action Plan:** The Action Plan summarizes the activities that will be undertaken in the upcoming Fiscal Year (FY) to meet the goals outlined in the Consolidated Plan. The Action Plan also identifies the federal and non-federal resources that will be used to meet the goals of the approved Consolidated Plan.
- **Citizen Participation Plan:** The CPP provides guidelines by which the City will promote engagement in the planning, implementation, and evaluation of the distribution of federal funds, as outlined in the Consolidated Plan, Action Plan, and CAPERs.
- **Community Development Block Grant:** HUD's CDBG program provides communities with resources to address a wide range of housing and community development needs that benefit very low and low-income persons and areas.
- **Consolidated Annual Performance Evaluation Report:** The CAPER assesses the City's annual achievements relative to the goals in the Consolidated Plan and proposed activities in the Action Plan. HUD requires the City to prepare a CAPER at the end of each fiscal year.
- **COVID-19 Substantial Amendment:** A Substantial Amendment to a Consolidated Plan or Annual Action Plan made for Program Year 2019 to enable expending of funds to prevent, prepare for, and respond to the coronavirus (COVID-19) either specifically allocated through and authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) passed by the U.S. Congress and signed into law by the President on March 27, 2020, or which include the programming or reprogramming of other entitlement funds to prevent, prepare for, and respond to the coronavirus (COVID-19).

- **Department Of Housing And Urban Development:** HUD is the federal government agency that creates and manages programs pertaining to federal home ownership, affordable housing, fair housing, homelessness, and community and housing development.
- **Displacement:** Displacement refers to the involuntary relocation of individuals from their residences due to housing development and rehabilitation activities paid for by federal funds.
- **Eligible Activity:** Activities that are allowable uses of the CDBG funds covered by the CPP as defined in the Code of Federal Regulations Title 24 for HUD.
- **Emergency Solutions Grant:** HUD's ESG program provides communities with resources to serve homeless individuals and families via Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Re-Housing Assistance, Homeless Management Information System (HMIS), and Administrative Activities.
- **Entitlement Jurisdiction:** A city with a population of at least 50,000, a central city of a metropolitan area, or a qualified urban county with a population of at least 200,000 that receives grant funding from HUD.
- **Five Year Consolidated Plan:** HUD requires entitlement jurisdictions to prepare a Consolidated Plan every five years. The Consolidated Plan is a strategic plan that identifies housing, economic, and community development needs and prioritizes funding to address those needs over a five-year period.
- **HOME Investment Partnerships Program:** The HUD HOME program provides resources to fund a wide range of activities that build, buy, and/or rehabilitate affordable rental or homeownership housing or provide direct rental assistance to low-income people.
- **Housing Opportunities for Persons with AIDS:** The HUD HOPWA program provides resources that benefit low-income persons medically diagnosed with HIV/AIDS and their families, including housing and social services, chemical dependency treatment, nutritional services, case management, and assistance with daily living.
- **Low- and Moderate-Income:** As defined annually by HUD, Low- and Moderate-Income (LMI) is 0-80 percent of area median family income (AMI) for a jurisdiction, with adjustments for smaller or larger families. This includes those individuals presumed by HUD to be principally LMI (abused children, battered spouses, elderly persons, severely disabled adults, homeless persons, illiterate adults, persons living with AIDS and migrant farm workers). HUD utilizes three income levels to define LMI households:
 - Extremely low-income: Households earning 30 percent or less than the AMI (subject to specified adjustments for areas with unusually high or low-incomes)
 - Very low-income: Households earning 50 percent or less than the AMI (subject to specified adjustments for areas with unusually high or low-incomes)
 - Low- and moderate-income: Households earning 80 percent or less than the AMI (subject to adjustments for areas with unusually high or low-incomes or housing costs)
- **Public Hearing:** Public hearings are designed to provide the public the opportunity to make public testimony and comment. Public hearings related to the Consolidated Plan are to be advertised in local newspapers and made accessible to non-English speakers and individuals with disabilities.
- **Substantial Amendments:** Amendments are considered "Substantial" whenever one of the following is proposed:
 - A change in the allocation priorities or a change in the method of fund distribution.
 - A change which increases or decreases by 25 percent the amount allocated to a category of funding, or a project or activity budget funded by the entitlement grant programs.

- To implement an activity using CDBG funds for new programs that were not described in the Consolidated Plan or the current year Annual Action Plan.
- To change the purpose or intended beneficiaries of an activity approved for CDBG funding, e.g., instead of primarily benefitting lower income households the activity instead proposes to benefit mostly moderate income households.

Roles, Responsibilities, and Contact Information

The City of Fresno is a federal entitlement jurisdiction and is a recipient of grant funding from the federal government.

The City of Fresno's Charter established a council and manager form of government. Fresno's City Council is the elected legislative body of the City and is responsible for approving its Consolidated Plan, Action Plans, Substantial Amendments, and CAPERs prior to their submission to HUD.

It is the intent of the City to provide for and encourage citizen participation, with particular emphasis on participation by lower income persons who are beneficiaries of or impacted by entitlement- funded activities. The City encourages participation in all stages of the Consolidated Planning process by all residents, including minorities and non-English speaking persons, as well as persons with mobility, visual or hearing impairments, and residents of assisted housing developments and recipients of tenant-based assistance.

In general, hearings will be held at City Hall due to its central location, convenient access, and disability accessibility. Translation services will be provided when there is an indication that non- English speaking persons will be attending. Other reasonable accommodations will be provided on a case-by-case basis.

The General Contact Information for the City's HUD Entitlement Programs is:

City of Fresno

Thomas Morgan
Planning and Development Department
Housing and Community Development Division
2600 Fresno Street Room 3065
Fresno, CA 93721
559.621.8300 Phone
559.621.8721 TTY
thomas.morgan@fresno.gov

Citizen Participation Policies

Public Hearings

The City will hold at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings must address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, and a review of program performance. At least one of these hearings is held before the proposed consolidated plan is published for comment. At least one public hearing per year will be held before City Council.

The City Council public hearings will be held at Fresno City Hall, Council Chambers located at 2600 Fresno Street, Room 2097, Fresno, CA 93721. Listening devices, interpretation services, and other assistance to disabled persons or those with limited English proficiency will be provided upon request, ranging up to five business days prior notification to the City Clerk. Requests for disability-related modifications or accommodations required to facilitate meeting participation, including requests for auxiliary aids, services or interpreters, require

different lead times, ranging up to five business days. For this reason, it is important to provide as much advance notice as possible to ensure availability. Assistive Listening Devices (ALDs) are available upon request.

In the event that the City is unable to allow in-person citizen participation at a Public Hearing due to a local, state, or federal order, a Public Hearing may be conducted with remote citizen participation. Remote Citizen Participation options must include at a minimum a method for Citizens to listen to the Public Hearing, submit comments verbally by phone, and submit comments in writing or verbally using an internet application on an internet-enabled device.

Notice of Hearings and Review Periods

To allow the public time to provide comments prior to the submission of approved documents to HUD, the City will hold a minimum 30-day public review and comment period for the Consolidated Plan, Action Plan, and Substantial Amendment. The City will establish a public review period of at least 15 days for each CAPER and amendments to the CPP. The City will establish a minimum 5-day public review period for COVID-19 Substantial Amendments or Substantial Amendments made during a declared COVID-19 State of Emergency. Copies of the draft plans will be available to the public at City of Fresno Development and Resource Management, Room 3065, 2600 Fresno Street, Fresno, CA 93721. and on the website of the Housing and Community Development division at <http://www.fresno.gov/housing>.

The City will place public notices at libraries, recreation centers, community centers, online through the City's website, and through advertisement in the Fresno Bee in advance of a 30-day public review and comment period.

To ensure that the public, including minorities, persons with limited English proficiency, persons with disabilities, residents of public housing, and LMI residents are able to participate in the public review process, the City will provide residents, public agencies, and other stakeholders with notices on applicable public review periods and public hearings that adhere to the following:

- The notices will be published prior to the start of the public comment period and at least 15 days before the final public hearing and will include information regarding how to request accommodation and services available for persons with disabilities who wish to attend the public hearings.

The notices will be distributed to persons and agencies on the contact list maintained by the City for those parties expressing interest in receiving information and updates related to the City's Consolidated Plan, Action Plan, CAPER, Substantial Amendments and CPP. Interested parties may request to be added to this contact list by sending an email to HCDD@fresno.gov, by calling (559) 621-8300 or by writing to the Fresno Planning and Development, Room 3065, 2600 Fresno Street, Fresno, CA 93721. The notices will be distributed through a variety of methods, including email, newspaper publications and the City's website at www.fresno.gov. The notices will include information on how to obtain a copy of the draft documents and scheduled hearing dates, times, and locations.

The public may file comments on draft plans in writing to the Fresno Planning and Development, Room 3065, 2600 Fresno Street, Fresno, CA 93721; via email to HCDD@fresno.gov; by phone at (559) 621-8300. Comments may also be submitted in person to Fresno Planning and Development, Room 3065, 2600 Fresno Street, Fresno, CA 93721, Monday through Friday during business hours, and during the Council adoption hearing.

When necessary or applicable, the City may combine notices complying with several individual requirements into one comprehensive notice for dissemination and publication.

In the event that City Hall, Fresno County Libraries, or City Neighborhood and Community Centers are closed to the Public due to a local, state, or federal order, the requirement to post notices at these locations will be waived, and the City will instead distribute the notices through digital channels to include at least two internet-based communication platforms maintained by City of Fresno Public Affairs, such as Facebook or Twitter.

In the event that a Public Hearing will be conducted remotely, the public notice will include information instructing the Public how to acquire specific technical instructions for participation.

Comments on Adopted Plans

Comments from residents, public agencies, and other stakeholders regarding the adopted Consolidated Plan or related amendments and performance reports may be submitted in writing or verbally to the General Contact at Fresno Planning and Development, Room 3065, 2600 Fresno Street, Fresno, CA 93721. Written comments will be referred to appropriate City staff for consideration and response. The City will attempt to respond to all comments within 15 business days and maintain a correspondence file for this purpose.

HUD officials will consider public concerns regarding the City's plans and programs described in this Citizen Participation Plan. Written concerns may be submitted to: Kimberly Nash, Director Community Planning and Development Division U.S. Department of Housing & Urban Development San Francisco Regional Office, Region IX, One Sansome Street, Suite 1200, San Francisco, CA 94104-4430.

Availability of Draft and Approved Documents

The draft and final versions of the Consolidated Plan, Action Plan, all related amendments, records, and regulations will be available online at the City's website: www.fresno.gov. Hard copies of all documents will be available at Fresno Planning and Development, Room 3065, 2600 Fresno Street, Fresno, CA 93721 and upon written request. If the City is unable to provide immediate access to the documents requested, it will make every effort to provide the documents and reports within 15 business days from the receipt of the request.

During the 30-day public review and comment period, copies of the document will be available to the public for review at libraries, recreation centers, community centers, and through the City's website at www.fresno.gov. In the event that City Hall, Fresno County Libraries, or City Neighborhood and Community Centers are closed to the Public due to a local, state, or federal order, the requirement to distribute documents at these locations will be waived.

Displacement Policy

As part of the CPP, the City must maintain a displacement policy. Displacement refers to the involuntary relocation of individuals from their residence due to housing development and rehabilitation paid for with federal funds. The City will continue to use existing federal and state relocation guidelines, as applicable, to minimize displacement and to alleviate the problems caused by displacement. Both the federal government and the State of California have specific requirements dictating the amount of benefits and assistance that must be provided to lower income persons and households relocated from their homes as a result of displacement. Depending on the funding source, displaced persons may be offered one or more of the following:

- A rent subsidy for another unit
- A cash payment to be used for rent or a down payment on the purchase of a dwelling unit
- Moving and related expenses

The City's rehabilitation programs may also incur relocation issues when they provide minor additions to existing dwellings in order to address overcrowding. Any temporary relocation costs are included in the rehabilitation package offered to clients.

Technical Assistance

The City will, to the extent feasible, respond to requests for technical assistance from entities representing LMI groups who are seeking federal entitlement funding in accordance with grant procedures. This may include, but is not limited to, providing information regarding how to fill out applications, other potential funding sources, and referrals to appropriate agencies within and outside the City. "Technical assistance," as used here, does not

January 28, 2021

include the provision of funds to the entities requesting such assistance. Assistance will also be provided by Department of Housing staff to interested individuals and resident groups who need further explanation on the background and intent of the Housing and Community Development Act, interpretation of specific HUD regulations, and project eligibility criteria for federal grants.

Development of the Fair Housing Study (AI or successor study)

In developing the Fair Housing Study, the City will consult with community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, including the Fair Housing Council of Central California and other nonprofit organizations that may receive funding under HUD's Fair Housing Initiative Program (FHIP) or that may have other specialized knowledge of fair housing within the city.

- **Introductory Public Hearing:** During the preparation of the Fair Housing Study, at least two hearings will be held to obtain the views of the general public on fair housing-related data and affirmatively furthering fair housing in the City's housing and community development programs. The first public hearing will solicit input on fair housing issues in the city and shall be held during development of the Study, before the draft is published for comment. No later than the date of the first public hearing on the Fair Housing Study, the HUD-provided data and other supplemental data will be made available to the general public. This may include a link to HUD's website where the data can be readily accessed.
- **Publication of the Proposed AI:** When complete, the City will make available the draft Fair Housing Study for a period of no less than 30 days in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. Notice of the public comment period on the draft Study will be published in the Fresno Bee. The public notice shall include a brief summary of the content and purpose of the draft Fair Housing Plan, the dates of the public display and comment period, the locations where copies of the draft document can be examined, how comments will be accepted, and when the document will be considered for action by the City Council.
- A second public hearing will be conducted during or after the 30-day public comment period on the Fair Housing Study during which the City will address identified factors contributing to fair housing issues, and proposed fair housing goals and priorities for affirmatively furthering fair housing. Any comments or views of residents of the community received in writing, or orally at the public hearing, will be considered by the City in preparing the final Fair Housing Study and a summary of these comments or views shall be attached to the final AFH.
- **Revisions to the Fair Housing Study:** The City may revise its Fair Housing Study under the following circumstances:
 - A material change occurs. A material change is a change in circumstances in the City that affects the information on which the Fair Housing Study is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the Study no longer reflect actual circumstances. Examples include, but are not limited to:
 - Presidentially declared disasters, under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.), affecting the jurisdiction that are of such a nature as to significantly impact the steps the City may need to take to affirmatively further fair housing
 - Significant demographic changes
 - New significant contributing factors in the city, and
 - Civil rights findings, determinations, settlements (including voluntary compliance agreements), or court orders
 - Upon HUD's written notification specifying a material change that requires the revision.

Appendix A: Notices and Public Outreach

The Public Comment Period began January 28, 2021 and concluded on February 3, 2021 at 4:00 P.M. Three public comments were received are attached as Appendix B. Residents were encouraged to submit comments by one of the following methods:

Submit Comments by Mail:

City of Fresno
Planning and Development Department
Attn: Housing and Community Development Division
2600 Fresno Street Room 3065
Fresno CA 93721

Submit Comments by Email:

HCDD@fresno.gov

Please include "Sub Amend 2019-06" in the subject line

Submit Comments by Phone:

559-621-8300

Submit Comments by TTY:

559-621-8721

Submit Comments by Fax:

559-457-1579

The Substantial Amendment was scheduled for consideration by the Council of the City of Fresno at their February 4, 2021 meeting, and was continued to the February 18, 2021 meeting upon which it was adopted as amended. Spanish, Hmong, and ASL interpreters were available for the public meeting. Accommodations were available upon request by contacting the office of the City Clerk at (559) 621-7650 or clerk@fresno.gov at least three business days prior to the meeting.

Public Notice – Fresno Bee

The Fresno Bee
fresnobee.com

Central Valley
The Valley's Lifestyle Magazine
SIERRA STAR
Serving Eastern Placers Since 1957

Vida
en el valle

AFFIDAVIT OF PUBLICATION

Account #	Ad Number	Identification	PO	Amount	Cols	Depth
560367	0004860011	#4860011 PUBLIC NOTICE PUBLIC REVIEW PER	CDBG-CV Public Notice 2021	\$798.00	2	4.99 In

Attention: Edward Chivevere

CITY OF FRESNO
HOUSING DIVISION
2600 FRESNO ST, ROOM #3065
FRESNO, CA 937213604

PUBLIC NOTICE

#4860011

PUBLIC NOTICE

PUBLIC REVIEW PERIOD FOR SUBSTANTIAL AMENDMENT 2019-06 TO THE
2019-2020 ANNUAL ACTION PLAN FOR COVID-19 RESPONSE AND
AMENDMENT TO THE CITIZEN PARTICIPATION PLAN

The City of Fresno (City) is a federal entitlement community that receives an annual allocation of grant funds from the U.S. Department of Housing and Urban Development (HUD). As an entitlement community, the City is required to prepare an Annual Action Plan detailing the uses of entitlement funds to meet its affordable housing and community development goals as outlined in its Consolidated Plan, and to adopt and follow a Citizen Participation Plan in determining the priorities and projects to be included in the Consolidated Plan and Annual Action Plans.

As part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), HUD has allocated additional entitlement funds to the City of Fresno to prevent, prepare for, and respond to the coronavirus (COVID-19). In order to expedite the implementation of programs and investments to address the COVID-19 pandemic, HUD has issued guidance to allow for remote citizen participation and shortened public comment periods for entitlement funds used to prevent, prepare for, and respond to the COVID-19 pandemic.

For Program Year 2019-2020, the City is proposing to make a \$7,980,066 Substantial Amendment to its Annual Action Plan for additional Community Development Block Grant-Coronavirus (CDBG-CV) funds to prevent, prepare for, and respond to COVID-19, and to amend its Citizen Participation Plan to add provisions for citizen participation requirements associated with entitlement funds to address the COVID-19 pandemic.

The Substantial Amendment is available for a 5-day review beginning January 28, 2021 and ending on February 3, 2021 at 5:00 PM. The amendment can be viewed at www.fresno.gov/housing/. Comments are encouraged and may be submitted in writing to the City of Fresno, Housing and Community Development Division, 2600 Fresno Street, Room 3065, Fresno, California 93721; by emailing HCDD@fresno.gov; by calling 559-621-8300; by TTY at 559-621-8721; or by fax to 559-457-1579.

Si necesita información en español sobre este aviso, llame al 559-621-8300 o por correo electrónico a HCDD@fresno.gov.

Yog xax paub ntiv hog tsab ntawv ceab toom no, hu rau 559-621-8300 lossis email rau HCDD@fresno.gov.

COUNTY OF DALLAS
STATE OF TEXAS

The undersigned states:

McClatchy Newspapers in and on all dates herein stated was a corporation, and the owner and publisher of The Fresno Bee.

The Fresno Bee is a daily newspaper of general circulation now published, and on all-the-dates herein stated was published in the City of Fresno, County of Fresno, and has been adjudged a newspaper of general circulation by the Superior Court of the County of Fresno, State of California, under the date of November 28, 1994, Action No. 520058-9.

The undersigned is and on all dates herein mentioned was a citizen of the United States, over the age of twenty-one years, and is the principal clerk of the printer and publisher of said newspaper; and that the notice, a copy of which is hereto annexed, marked Exhibit A, hereby made a part hereof, was published in The Fresno Bee in each issue thereof (in type not smaller than nonpareil), on the following dates.

January 26, 2021



I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated January 26, 2021

Sm

Extra charge for lost or duplicate affidavits.
Legal document please do not destroy!

Public Notice – Email (1 of 2)

The English and Spanish versions of the public notice were distributed by email, posted to the website of the City Clerk, and linked from Twitter and Facebook. The notice was presented on-air in Hmong on radio station KBIF.

From: HCDD
Sent: Tuesday, January 26, 2021 10:51 AM
Subject: City of Fresno Public Notice: Public Review Period for Substantial Amendment 2019-06 to the 2019-2020 Annual Action Plan for COVID-19 Response and Amendment to the Citizen Participation Plan
Attachments: City of Fresno Public Notice - Substantial Amendment 2019-06.pdf

Dear Fresno Resident,

You are receiving this email because you have previously expressed interest in receiving updates related to the City of Fresno's (City) Housing and Community Development efforts. If you no longer wish to receive e-mails like this, please simply reply with the word **STOP** to be removed from future messages.

PUBLIC NOTICE

PUBLIC REVIEW PERIOD FOR SUBSTANTIAL AMENDMENT 2019-06 TO THE 2019-2020 ANNUAL ACTION PLAN FOR COVID-19 RESPONSE AND AMENDMENT TO THE CITIZEN PARTICIPATION PLAN

The City of Fresno (City) is a federal entitlement community that receives an annual allocation of grant funds from the U.S. Department of Housing and Urban Development (HUD). As an entitlement community, the City is required to prepare an Annual Action Plan detailing the uses of entitlement funds to meet its affordable housing and community development goals as outlined in its Consolidated Plan, and to adopt and follow a Citizen Participation Plan in determining the priorities and projects to be included in the Consolidated Plan and Annual Action Plans.

As part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), HUD has allocated additional entitlement funds to the City of Fresno to prevent, prepare for, and respond to the coronavirus (COVID-19). In order to expedite the implementation of programs and investments to address the COVID-19 pandemic, HUD has issued guidance to allow for remote citizen participation and shortened public comment periods for entitlement funds used to prevent, prepare for, and respond to the COVID-19 pandemic.

For Program Year 2019–2020, the City is proposing to make a \$7,980,086 Substantial Amendment to its Annual Action Plan for additional Community Development Block Grant-Coronavirus (CDBG-CV) funds to prevent, prepare for, and respond to COVID-19, and to amend its Citizen Participation Plan to add provisions for citizen participation requirements associated with entitlement funds to address the COVID-19 pandemic.

The Substantial Amendment is available for a 5-day review beginning January 28, 2021 and ending on February 3, 2021 at 5:00 PM. The amendment can be viewed at www.fresno.gov/housing/. Comments are encouraged and may be submitted in writing to the City of Fresno, Housing and Community Development Division, 2600 Fresno Street, Room 3065, Fresno, California 93721; by emailing HCDD@fresno.gov; by calling 559-621-8300; by TTY at 559-621-8721; or by fax to 559-457-1579.

Public Notice – Email (2 of 2)

AVISO PÚBLICO

PERÍODO DE REVISIÓN PÚBLICO DE LA ENMIENDA SUSTANCIAL 2019-06 AL PLAN DE ACCIÓN ANUAL 2019-2020 COMO RESPUESTA AL COVID-19 Y ENMIENDA AL PLAN DE PARTICIPACIÓN CIUDADANA

La Ciudad de Fresno (Ciudad) es una comunidad de subsidio federal que recibe una asignación anual de fondos de subvención del Departamento de Vivienda y Desarrollo Urbano (HUD) de EE. UU. Como comunidad de subsidio, se requiere que la Ciudad prepare un Plan de Acción Anual que detalle los usos de los fondos de subsidio para cumplir con sus objetivos de vivienda asequible y desarrollo comunitario como se describe en el Plan Consolidado y que adopte y siga un Plan de Participación Ciudadana para determinar las prioridades y proyectos que se incluirán en el Plan Consolidado y Planes de Acción Anuales.

Como parte de Ayuda, Alivio y Seguridad Económica del Acto de Coronavirus (Acto CARES), HUD ha asignado fondos de subsidio adicionales a la Ciudad de Fresno para prevenir, preparar y responder al coronavirus (COVID-19). Con el fin de acelerar la implementación de programas e inversiones para abordar la pandemia de COVID-19, HUD ha proporcionado una guía para permitir la participación remota de los ciudadanos y acortar los períodos de comentarios públicos para los fondos de subsidio utilizados para prevenir, preparar y responder a la pandemia de COVID -19.

Para el Año de Programa 2019–2020, la Ciudad propone hacer una Enmienda Sustancial de \$7,980,086 a su Plan de Acción Anual para fondos adicionales del Subvención de bloque de desarrollo comunitario-Coronavirus (CDBG-CV) para prevenir, prepararse y responder a la pandemia de COVID-19 y enmendar su Plan de Participación Ciudadana para agregar disposiciones para los requisitos de participación ciudadana asociados con los fondos de subsidio para abordar la pandemia de COVID-19.

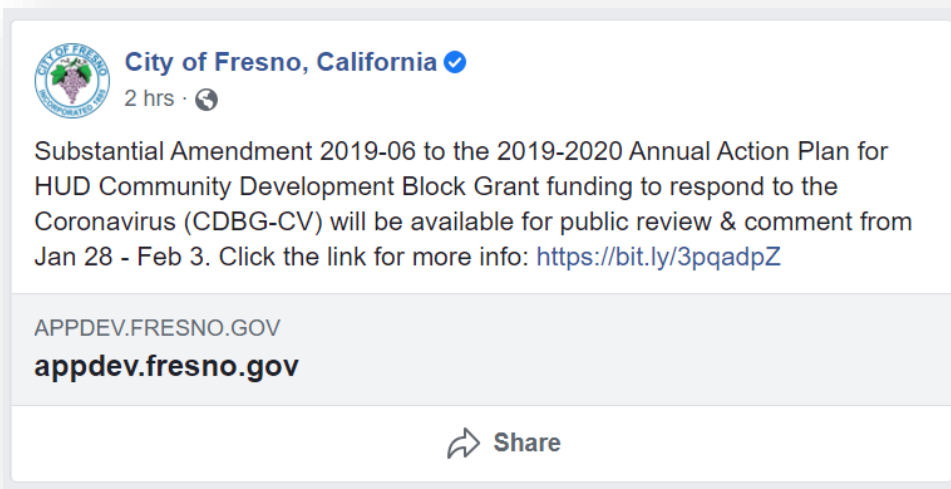
La Enmienda Sustancial está disponible para revisión por 5 días a partir del 28 de enero de 2021 hasta el 3 de febrero de 2021 a las 5:00 PM. La enmienda se puede ver en www.fresno.gov/housing/. Se alientan los comentarios y pueden ser enviados por escrito a la Ciudad de Fresno, División de Vivienda y Desarrollo Comunitario, 2600 Fresno Street, Sala 3065, Fresno, California 93721; enviando un correo electrónico a HCDD@fresno.gov; llamando al 559-621-8300; por TTY al 559-621-8721; o por fax al 559-457-1579.

Housing and Community Development Division
City of Fresno Planning and Development Department
2600 Fresno Street • CHN 3065 • Fresno CA 93721
HCDD@fresno.gov • 559-621-8300



Public Notice – Social Media

Facebook:



Twitter:



Availability of Public Review Document – Email

From: HCDD
Sent: Friday, January 29, 2021 11:07 AM
Subject: Document Available for Public Review: 2019-2020 Annual Action Plan Substantial Amendment 2019-06 and COVID-19 Amendment to the Citizen Participation Plan

Dear Fresno Resident,

You are receiving this email because you have previously expressed interest in receiving updates related to the City of Fresno's (City) Housing and Community Development efforts. If you no longer wish to receive e-mails like this, please simply reply with the word **STOP** to be removed from future messages.

The City's Housing and Community Development Division has published the following document for public comment:

- [2019-2020 Annual Action Plan Substantial Amendment 2019-06 and COVID-19 Amendment to the Citizen Participation Plan](#)

The Amendment is available at www.fresno.gov/housing for a 5-day review ending on February 3, 2021.

Written comments are encouraged and may be submitted to the City of Fresno, Housing and Community Development Division, 2600 Fresno Street, Room 3065, Fresno, California 93721, or by emailing HCDD@fresno.gov. Comments are also accepted by phone (559-621-8300), fax (559-457-1579), or TTY (559-621-8721). Please also consider sharing this message with your networks, and those who may be interested in providing public comments.

[AVISO PÚBLICO - PERÍODO DE REVISIÓN PÚBLICA DE LA ENMIENDA SUSTANCIAL 2019-06 AL PLAN DE ACCIÓN ANUAL 2019-2020 COMO RESPUESTA AL COVID-19 Y ENMIENDA AL PLAN DE PARTICIPACIÓN CIUDADANA](#)

Housing and Community Development Division
City of Fresno Planning and Development Department
2600 Fresno Street • Fresno CA 93721
HCDD@fresno.gov | 559-621-8300



Appendix B: Public Comments and City Responses

The City received 3 Public Comment between January 28, 2021 and February 3, 2021.

- **Cindy Piombino:** Email requesting mobile medical clinics for the homeless, funding for warming & cooling centers, expressing concern about capacity at the Fresno County Behavioral Services, and expressing excitement for the help this amendment will provide the homeless.

[City Response: The City recommends that mobile resources related to the Medical Clinic allocation for substantial amendment 2019-06 be considered when evaluating potential subrecipients for funding subject to eligibility under federal regulations and balanced with the need to quickly deploy funds in the most impactful way. While warming and cooling centers are not appropriate uses of the Coronavirus relief funds on account of their congregate settings, the City agrees with the critical need for these facilities and will forward this comment for consideration to the appropriate City units. The City is working closely with Fresno County through the Joint COVID-19 homeless response, and funds from both organizations and the Fresno Madera Continuum of Care are being deployed to build capacity. The public comment has been considered and accepted.]

- **Brandi Nuse-Villegas:** Email requesting mobile medical clinics for the homeless, asking for clarification with regard to the number of rooms (in addition to the number of beds) that will be supported through this funding; requesting that some participants be allowed single-occupancy rooms based on their circumstances; requesting that a portion of rooms be reserved for walk-ins; expressing that there is still substantial need for additional housing for unsheltered individuals; requesting that the City make a more concerted effort to get feedback from unsheltered individuals; that any additional acquisitions of buildings be in safer, more resourced areas; noting that with regard to tenant/landlord counseling many tenants do not know their rights and have trouble finding housing with vouchers; and also asked that the opportunity for public comment for amendments such as this be more widely communicated and with a longer comment period.

[City Response: The City recommends that mobile resources related to the Medical Clinic allocation for substantial amendment 2019-06 be considered when evaluating potential subrecipients for funding subject to eligibility under federal regulations and balanced with the need to quickly deploy funds in the most impactful way. The 387 beds identified for funding associated with the Fresno Housing Homekey sites and the City of Fresno's Travel Inn location represent the number of units (rooms) and will serve one household at a time which may represent one or more beds each. The request regarding reserving rooms for walk-ins and single-occupancy rooms will be forwarded for consideration in program design and implementation. The request that additional permanent housing be located in safer, more resourced areas is consistent with the City's 2020-2024 Consolidated Plan and 2020 Analysis of Impediments to Fair Housing Choice. While this amendment was expedited in light of the Coronavirus emergency consistent with a HUD waiver allowing for a 5-day comment period, the City recognizes the need to engage the public, especially beneficiaries of program funds, to the greatest extent possible and appreciates the feedback and suggestions for how to better accomplish this. The public comment has been considered and accepted.]

- **Karla Martinez, Leadership Counsel for Justice and Accountability & Alexandra Alvarado, Faith in the Valley:** Email expressing support for the proposal's allocation of \$480,000 to Tenant/Landlord Counseling and requesting additional funds be identified to fund a proposed 1-year pilot Right-to-Counsel program and indicates that Right-to-Counsel is proven to reduce displacement due to eviction, increase housing stability, and reduce inflows into homelessness.

[City Response: The City's 2020 Analysis of Impediments to Fair Housing Choice and 2020-2024 Consolidated Plan for HUD entitlement funding support the need for additional fair housing education, outreach, referral, and resolution services. The detailed pilot proposal is appreciated and The City will consider how its allocation for tenant/landlord counseling can potentially be coordinated with this or other legal support services for tenants throughout the City of Fresno, as well as in further refining its Fair Housing services as prioritized in the 2020-2024 Consolidated Plan. The public comment has been considered and accepted.

Email Comment: City Piombino

From: Cindy Piombino [REDACTED]
Sent: Wednesday, February 3, 2021 2:23 PM
To: HCDD
Subject: Public comment

External Email: Use caution with links and attachments

Hi my name is Cindy Piombino, I am Ministry coordinator for Christ's Helping Hands. My volunteers and I Have been directly working with the homeless on a monthly basis for about 10 years.

Concerning today's HUD and Fresno City mtg I would like to suggest that supporting Medical Clinics, we have Clinic Sierra Vista and United Health Centers. Understandably I know we need to support them with more covid-19 monies BUT... We need a medical mobile bus to go out to meet our homeless where they are at.. This way Community Health needs can be met, vaccinations can take place, TB testing, etc I know Fresno County Health Department needs one, but we do need it we need that medical mobile bus.

Now something that wasn't mentioned in the allocation of funding was warming and cooling centers. I urge you to find some money to support those centers during the seasons they need to be open, they are a lifesaver literally.

I'm very excited after reading these plans and where the monies going and the long-term effects that it is going to have and the help it is going to give out to our homeless.

Is Fresno County Behavioral Services ready for the caseloads that are coming their way How are you going to help them Fresno City by getting more qualified social workers inand drug abuse social workers in.

Thank you for listening to my concerns I playfully submitted to you.

Cindy Piombino

Email Comment: Brandi Nuse-Villegas (1 of 2)

From: Brandi Nuse-Villegas <[REDACTED]>
Sent: Wednesday, February 3, 2021 3:39 PM
To: HCDD
Subject: Public comment on 2019-2020 Annual Action Plan Substantial Amendment 2019-06 and COVID-19 Amendment to the Citizen Participation Plan

External Email: Use caution with links and attachments

I am grateful for funding for medical care in underserved communities through clinics. I ask that this include considering how to bring medical care to those who are unsheltered, such as having mobile units with the clinic to serve those without shelter and plan for reaching those with whom it may be difficult to maintain contact due to inconsistent phone contact, forced movement by the homeless taskforce, etc.

Regarding the shelters. I had the opportunity to provide transportation to several people through We Are Not Invisible. It was a wonderful moment for those who had been waiting for sufficient shelter for years.

There are several areas that I think need to be clarified. The document says that there will be 387 "newly added emergency shelter beds with supportive services and shelter operations." It is important to state how many rooms are available, rather than beds, as this can be misleading. Some rooms may have two beds, but may house more than two people. Currently, there are two bedrooms that are housing a single occupant, which should not be changed and there should be allowance for single occupancy. Some people will not thrive and may leave the shelter if they are placed with a stranger in the same room, due to trauma, personal boundaries, and the lack of privacy and protection of belongings. However, this will result in a difference in the number of beds available. I am aware that these numbers do not reflect completely new beds. One of the low barrier shelters that opened in 2019 was to close and the occupants moved into the motels. This results in a lower number of actual new beds available to the unhoused community. And it is important to communicate that to the community for an accurate picture of what is available.

This number is also important, as the city, the HTF, and other entities respond based on the numbers.

It is also important to note the actual number of beds available to walk-ins, as we may be placing the burden of finding shelter to the unhoused community, when primacy is given to those referred or reserved by homeless assistance agencies.

I also want to voice concern that while this plan does provide needed low barrier shelter space for the community, this represents possibly 10% of the homeless community that is currently unhoused. PIT counts tend to be a substantially low number compared to the unhoused community. We have many more who are seeking shelter and permanent housing need it immediately. Once we fill these shelters, which will happen as immediately as these rooms become available, we will still have a substantial problem with the number of those seeking and needing housing. While this is an important step, especially to those who will get these rooms, it should not be considered "solving the homeless shelter problem," because there will be at least 10x more people needing housing and shelter, including those who not on the street, but homeless, such as those living in their cars, living in motels, and living in temporary housing situations.

If we are limited in funds for these beds, we need to immediately be looking up other options for shelter and housing.

I request that the city makes a more concerted effort to get feedback from the unhoused community and plan in a way that will allow the greatest number to thrive.

I support the idea of creating permanent housing for our homeless community with these hotel with the idea of having services on site. I ask that the city look into developing the surrounding community area so that people in these units can thrive. I also ask that if any more building are acquired, they are in safer, more resourced areas, such as the County's Cornerstone Villages and that the city work with the community to address concerns and get more buy in from the neighborhood. Some of the people going to the shelters expressed concerns about being in that neighborhood. We should not be looking at our unsheltered community members as unsafe, but rather seek to provide them a safe, supportive environment, including the neighborhood.

Email Comment: Brandi Nuse-Villegas (2 of 2)

Regarding the tenant/landlord counseling, one of our major issues is tenants no knowing their rights and not having sufficient advocacy. We also have difficulty with people not finding housing with vouchers, due to landlord resistance. I hope this will address this issue.

I also ask that when items like these are brought to the public, the information is more widely distributed and more clearly explained to the community, and that there would be a greater effort to reach those who are effected, in this case, the homeless community, those in low income neighborhoods in need of improved access to medical care, and those who may face tenant issues and housing insecurity. I did note this item was posted in the City of Fresno page, but has no information in the post on February 29 or the document title explaining the plan and what the public was invited to do, with an image, as posts with images are more widely seen. I request that this be communicated in a way that helps the public quickly know what is it and why it's important and post it in more places including the Fresno subreddit on Reddit. The lack of engagement on these posts shows that people may have no idea what it is, whereas, the post that shared the community needs survey had greater engagement. This is especially important if the community is given only five days for input. I ask that greater effort be placed in giving more than 5 days.

Email Comment: Karla Martinez, Leadership Counsel for Justice and Accountability & Alexandra Alvarado, Faith in the Valley (1 of 6)



February 3rd, 2021

Attn: Fresno City Council
Attn: Council President Luiz Chavez
2600 Fresno St.
Fresno, CA 93721

Public Comment RE: 2019-2020 Annual Action Plan Substantial Amendment 2019-06 and COVID-19 Amendment to the Citizen Participation Plan

Dear Council President Chavez and fellow Councilmembers,

Thank you for the opportunity to submit comments on the Substantial Amendment being made to the 2019-2020 Annual Action Plan. Leadership Counsel for Justice and Accountability works alongside some of the most impacted communities to advocate for sound policy and eradicate injustice to secure equal access to opportunity regardless of wealth, race, income, and place. At Faith in the Valley we work alongside community members, multi-faith leaders, and students to put our faith into action. We're working to advance a movement for racial justice and health equity, and prioritize people over profit for a future where everyone is treated as sacred, and has a chance to thrive and live a healthy decent life. Collectively, we work with community leaders throughout Fresno City on various issues such as affordable housing, essential services, and the right to live free from industrial pollution with infrastructure that supports healthy lifestyles.

The substantial amendment proposal in the 2019-2020 Annual Action Plan is necessary, and an essential step towards the priorities highlighted in the 2020-2024 Consolidated Plan. It is crucial that we work towards preventing homelessness during the coronavirus pandemic. We want to especially highlight the importance of preventing homelessness and evictions occurring during the COVID-19 pandemic by asking this Council to support funding a tenant legal aid program with CDBG-CV funds under the COVID-19 Tenant/Landlord Counseling project of the substantial amendment, which is to be allocated \$480,000.

RTC is proven to reduce displacement due to eviction, increase housing stability, and reduce inflows into homelessness. We must invest in a court of action to stabilize homes before they become homeless, especially during an unprecedented public health crisis. Evictions during a global pandemic put tenants' health and safety, and the wider community, in even greater harm. Investing in access to legal aid for tenants proves to be cost-effective and saves the city and its

Email Comment: Karla Martinez, Leadership Counsel for Justice and Accountability & Alexandra Alvarado, Faith in the Valley (2 of 6)



constituents more money in the long run. Cost-benefit studies have shown that providing the necessary funding for a Right to Counsel reduces costs all across other sectors such as:

- The cost of providing public benefits when jobs are lost due to eviction or the eviction process;
- Certain additional costs associated with homelessness, such as law enforcement and incarceration costs;
- The cost of family, community, and neighborhood instability
- Over time, a reduction of the number of eviction cases filed, resulting in improved use of Fresno County court resources.

We urge this Council to allocate this CDBG-CV funding towards a tenant legal aid program. We ask that there be an additional \$520,000 allocated to this effort to fully fund a one year pilot to demonstrate this program's effectiveness (see Appendix A). A potential funding source is from the anticipated \$32.8 million coming to the City of Fresno from the Federal Emergency Rental Assistance. Another \$20 million allocation for legal aid across the country from this same Federal COVID Relief Package and Spending Bill. We must ensure that Fresno residents stay housed and safe during a global pandemic and provide them with the necessary resources and services to do so. We appreciate your time and consideration and willingness to accept our comments. If any questions arise, do not hesitate to contact me at kmartinez@leadershipcounsel.org.

Sincerely,

Karla Martinez

Leadership Counsel for Justice and Accountability

Alexandra Alvarado

Faith in the Valley

Email Comment: Karla Martinez, Leadership Counsel for Justice and Accountability & Alexandra Alvarado, Faith in the Valley (3 of 6)



Appendix A

January 2021

The Fresno Right to Counsel Coalition Proposal to the City of Fresno

I. SUMMARY

RTC is proven to reduce displacement due to eviction, increase housing stability, and reduce inflows into homelessness. This is based on research in jurisdictions that passed RTC, meetings with key stakeholders who helped establish RTC in cities across the nation, and meetings with people who currently administer RTC programs in Los Angeles and San Francisco¹. Our proposal is scalable to encompass more staff and resources to support residential low-income tenants as they face legal battles during COVID, and we hope this becomes a permanent program to help for years to come. The pilot program will include:

- Outreach and education campaign
 - A city-wide, multi-language public awareness and targeted outreach campaign
 - Public education workshops and mobile clinics, in multiple languages, on tenant and landlord rights and responsibilities
- Legal aid
 - Legal assistance for low-income tenants encountering legal issues. This includes but is not limited to being served with a notice from their landlord (e.g. 3-day notice, notice of rent increase, etc.)
- Direct legal representation
 - Legal representation in court for low-income tenants facing eviction
 - Staff present at the Fresno County courthouse on eviction court days to provide legal aid and representation
- Evaluation
 - A comprehensive annual evaluation of the RTC program by Stout Inc. to determine its effectiveness

Moreover, the aforementioned programs will be leveraged with existing City policies, programs, and resources, and partnerships with non-government agencies to address our housing crisis as a whole. These programs include:

- Housing Retention Program

¹ The Fresno Right to Counsel Coalition is indebted to the Los Angeles Right to Counsel Coalition for the extensive research and planning they engaged in to produce "Stemming the Flow into Homelessness: A Proposal for a Tenants' Right to Counsel in the City of Los Angeles" (February 6, 2019). The materials shared by the LA RTC Coalition, Strategic Actions For a Just Economy (SAJE), San Francisco's Eviction Defense Collaborative, the Right to Counsel NYC Coalition, and the National Coalition for a Civil Right to Counsel guided the development of our proposal and thus vision for Fresno's RTC program.

Email Comment: Karla Martinez, Leadership Counsel for Justice and Accountability & Alexandra Alvarado, Faith in the Valley (4 of 6)



- Rental Housing Inspection Act
- Anti-Slum Enforcement Team
- Partnerships with community-based organizations, legal aid organizations, and other non-government agencies to outreach to tenants who are most at risk of housing instability

II. BUDGET

Table 1. Estimated Budget for Right to Counsel Pilot

Input	Description	Cost
Attorney	In hiring 3 attorneys, RTC can serve approx. 1,000 clients (one-third of the total number of cases filed through the Fresno County Superior Court pre-Covid).	\$375,000 (\$125,000 per attorney)
Legal Secretary	One full-time legal secretary to manage the administrative duties associated with RTC.	\$70,000
Legal Clerks	Stipends for 9-12 year-round part-time legal clerks to work under the supervision of RTC attorneys.	\$300,000 (\$25,000 per clerk)
Legal Interns	Stipends for third year law students to support RTC attorneys and legal clerks. Must work 4-12 hours per week.	\$30,000 (\$20/hour)
Misc. Expenses	Miscellaneous operating costs for RTC based on the City Attorney's proposal.	\$20,000
Public Outreach and Education	This will cover media, door-to-door, clinics, workshops, and other public outreach methods to inform the public of available resources. Contracting with community-based organizations, legal aid agencies, and other non-government organizations to support city-wide public outreach and work with RTC lawyers and legal clerks.	\$200,000
Evaluation	Contract with Stout Risius Ross, LLC for a comprehensive cost-benefit study of year one to assess RTC and to determine how much it would cost to scale the program to	\$5,000

Email Comment: Karla Martinez, Leadership Counsel for Justice and Accountability & Alexandra Alvarado, Faith in the Valley (5 of 6)



	full capacity.	
Total		1,000,000

III. BENEFITS

A recent study conducted on San Francisco's RTC program noted, "there is strong evidence that increasing access to legal aid is one of the most successful and cost-effective interventions to reducing homelessness²." Cost-benefit analyses conducted by Stout for New York³ (\$320 million), Los Angeles⁴ (\$370 million for the county and city combined), Philadelphia⁵ (\$45.2 million), and Baltimore⁶ (\$17.5 million) reveal significant returns on investment. In addition to the more quantifiable and reliable revenue savings that are included in the figures above, the following additional areas are where cities and counties can expect to reduce expenditures through investments in a Right to Counsel program:

- The education costs, juvenile justice costs, and child welfare costs associated with children experiencing homelessness and housing instability;
- The negative impact of eviction on a tenant's credit score, ability to find new housing, and the potential loss of a subsidized housing voucher;
- The cost of providing public benefits when jobs are lost due to eviction or the eviction process;
- Certain additional costs associated with homelessness, such as other law enforcement and incarceration costs;
- The cost of family, community, and neighborhood instability;
- Preservation of financial and personal assets;
- The costs to the City of enforcing rent laws and regulations that could be avoided; and
- A reduction, over time, of the number of eviction cases, filed, resulting in improved use of Fresno County court resources.

IV. CONCLUSION

The FY21 Spending Bill that passed in December 2020 includes several funding sources for year one funding for RTC, including funding from the COVID relief package Emergency Rental Assistance

² Jona Boçari, "Life, Liberty and the Pursuit of Happiness When Evicted: Lessons from San Francisco's Implementation of Tenant Right to Counsel" Independent Research March 2, 2020

<https://uncjourney.unc.edu/files/2020/05/UNC-JOURney-piece-FINISHED-REDACTED.pdf>

³ Stout report on The Financial Cost and Benefits of Establishing a Right to Counsel in Eviction Proceedings. Presented for: Pro Bono and Legal Services Committee of the New York City Bar Association Under Intro 214-A March 16, 2016

https://www2.nycbar.org/pdf/report/uploads/SRR_Report_Financial_Cost_and_Benefits_of_Establishing_a_Right_to_Counsel_in_Eviction_Proceedings.pdf

⁴ Stout report on Cost-Benefit Analysis of Providing a Right to Counsel to Tenants in Eviction Proceedings Prepared for: The Los Angeles Right to Counsel Coalition December 10, 2019

https://info.stout.com/hubfs/PDF/Eviction-Reports-Articles-Cities-States/Los%20Angeles%20Eviction%20RTC%20Report_12-10-19.pdf

⁵ Stout report on Economic Return on Investment of Providing Counsel in Philadelphia Eviction Cases for Low-Income Tenants Prepared for: The Philadelphia Bar Association's Civil Gideon and Access to Justice Task Force November 13, 2018 [Economic Return on Investment of Providing Counsel in Philadelphia Eviction Cases for Low-Income Tenants](#)

⁶ Stout report on The Economic Impact of an Eviction Right to Counsel in Baltimore City. Prepared for: The Public Justice Center May 8, 2020 <https://bmorerentersunited.org/rtc/stoutreport/>

Email Comment: Karla Martinez, Leadership Counsel for Justice and Accountability & Alexandra Alvarado, Faith in the Valley (6 of 6)



Program⁷ (90% of award can be spent on rent and utility assistance and 10% of award can be spent on housing stability efforts such as legal assistance). Additionally, the Spending Bill provides new funding (\$20 million) for legal assistance through HUD's Housing Counseling account. Government entities are awarded funds through a competitive grant process⁸. An additional \$50 million in funding was allocated to Community Development Block Grant funding. CDBG funds can be used for legal assistance⁹.

⁷ US Dept. of the Treasury, \$25 Billion, Emergency Rental Assistance Program

<https://home.treasury.gov/policy-issues/cares/emergency-rental-assistance-program>

⁸ The legal assistance grant is similar to the Legal Assistance to Prevent Evictions Act of 2020, which was introduced in the House in February 2020. <https://www.nhlp.org/wp-content/uploads/NHLP-Relief-Package-Approps-Analysis.pdf>

⁹ National Low-Income Housing Coalition (NLIHC) allocation breakdown of \$25 Billion Coronavirus Relief Fund (Dec. 2020) <https://nlihc.org/sites/default/files/Estimated-Coronavirus-Relief-Fund-Allocations.pdf>