

City of Fresno 2025 Prohousing Application
Public Participation Checklist and Response to Comments

Updated September 30, 2025

Introduction

The City of Fresno conducted a diligent public participation process in developing its Prohousing application and meaningfully considered all public input provided during meetings and in written comments. It should be noted that in preparing the application, the City presented a single example of how it meets the Prohousing Policy Description in each category, when in many categories multiple relevant examples exist. Policies revised in response to comments include 2N, 4C, and 4D.

- [City of Fresno 2025 Prohousing Application \(Public Review Draft\)](#)
- [City of Fresno 2025 Prohousing Application \(Revised Draft\)](#)

1. Appendix 6 Requirements

The City must meet five requirements under Appendix 6 to qualify for the Prohousing Designation. Each requirement is copied below along with an explanation of how the City met the requirement.

1. <u>Outreach through a variety of methods and languages to ensure access to the public process and provide opportunities for public input.</u>
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<i>Applicant should use methods such as newspaper ads, email, social media, fliers, etc., to inform the public that an application has been drafted and posted for public comment. Language access should reflect languages spoken in your local community and should be available in multiple languages in print media or upon request for digital media.</i>

The City met this requirement by informing the community about the public comment period through a variety of methods. The City posted the Draft Application to a public-facing webpage (www.fresno.gov/prohousing) and announced the public comment period through a) two emails sent to a list of more than 700 housing stakeholders, b) multiple postings on the City's social media pages, c) at three in-person tabling events at local farmer's markets and community events, and d) flyers distributed in English and Spanish. See documentation attached under 3. *Outreach Materials*.

2. <u>Specific effort to engage all segments of the community, including individuals or representatives of lower-income and special needs households, for-profit and non-profit developers, and special needs service providers.</u>
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<i>Individuals and organizations representing lower-income and special needs households, for-profit and non-profit developers, and special needs service providers</i>

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should be engaged, informed of, and offered an opportunity to comment on the application. Outreach lists utilized for Housing Element compliance would suffice.

The announcement for the public comment period was personally emailed to 21 local organizations that specialize in either advocacy or service delivery for lower-income and special needs households. The organizations included Leadership Counsel for Justice and Accountability, City of Fresno Disability Advisory Commission, The Children's Movement Fresno, Regenerate CA, Fresno Building Healthy Communities, Independent Living Association California, Centro La Familia, Central Valley Regional Center, Resources for Independence Central Valley, Fresno Housing, Every Neighborhood Partnership, Valley Center for the Blind, United Way Fresno and Madera Counties, Habitat for Humanity, The Fresno Center, Fresno Interdenominational Refugee Ministries, Self Help Enterprises, The Arc Fresno, Dreamcatchers, Cultural Brokers, and Central Valley Community Action. A number of these organizations also shared the announcement with their networks.

3. Availability of the draft document to the public, including notification to interested parties and all segments of the community, for thirty (30) calendar days and subsequent versions for seven (7) calendar days.

Applicants should post the application in print and digital forms, collect comments, and incorporate those comments into the application if necessary. Making the application available to the public could be satisfied by posting the application online and/or announcements through other mediums (e.g., local newspapers) so long as these forums include diverse segments of the community, including individuals or representatives of lower-income and special needs households, for-profit and non-profit developers, and special needs service providers.

The Draft Application was posted to www.fresno.gov/prohousing, on August 12, 2025, with a commenting deadline of September 12, 2025, and a notification was emailed to interested parties. Its availability was also announced through email, social media, and via in-person tabling at three local farmer's markets and community events. Printed copies of the Draft Application were provided upon request.

During the thirty-day period, four letters were received as well as two public comments during a noticed Public Hearing at Fresno City Council and public comments provided at a publicly noticed informative meeting. After review of public comment, the City modified the application in response to comments and reposted on September 22, 2025 for seven calendar days. One letter was received.

See documentation attached.

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4. Public hearings and informative meetings.

For the purposes of satisfying this requirement, a City Council or Board of Supervisors meeting informing the public of the jurisdiction's intent to submit a Prohousing Designation Program application, in addition to any subsequent meetings necessary to make revisions in response to public comment, will satisfy this requirement.

The City held two informative meetings and one public hearing at which community members could participate. An online informative meeting was held on August 15, 2025, and an in-person informative meeting was held on August 20, 2025 at a centrally-located community center, in conjunction with a workshop on implementation of the Housing Element. Translation for both meetings was provided in Spanish, Hmong, and Punjabi. Additionally, Fresno's City Council held a public hearing prior to voting on the resolution authorizing application for the Prohousing Designation on August 28, 2025.

5. Consideration of comments, including incorporation of comments into a jurisdiction's application and Prohousing Policies as appropriate.

Provide all comments received with a description of how the comment was incorporated into the application. If the comment is not appropriate for incorporation, please describe why.

The City provided a response to all comments received during the public comment period and revised application review period. Staff incorporated comments as appropriate. Please see 2. *Response to Public Comments* below for details.

2. Response to Public Comments

The City received three letters during the public comment period and one letter during the revised application review period. In addition, comments were shared during the in-person informative meeting on August 20, 2025 and during the City Council public hearing on August 28, 2025. Each discrete comment was given a comment ID (i.e., A1, A2) and the City has provided a response below.

2.1. List of Commenters

2.1.a Public Comment Period

ID	Individual/Signatory	Affiliation	Event	Date
A	Christine Barker-Dominguez			08-12-25
B	Meeting Participants		Informative Meeting	08-22-25
C	Pedro Martinez	Leadership Counsel for Justice and Accountability	City Council Hearing	08-28-25

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D	Brandi Nuse-Villegas		City Council Hearing	08-28-25
E	Pedro Martinez	Leadership Counsel for Justice and Accountability		09-12-25
F	Brandi Nuse-Villegas			09-13-25
G	Bob McCloskey			09-11-25

2.1.b. Revised Application Review Period

ID	Individual/Signatory	Affiliation	Date
H	Pedro Martinez	Leadership Counsel for Justice and Accountability	09-29-25

2.2. Comments and Responses

For written comments, City responses follow the image of each letter. Comments shared during an in-person meeting were transcribed and responses provided after each comment. Note that comments made verbally are transcribed as accurately as possible but may not be verbatim.

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Comment A – Christine Barker-Dominguez | August 12, 2025

From: [Christine Barker](#)
To: [LongRangePlanning](#)
Subject: Prohousing Comments
Date: Tuesday, August 12, 2025 7:48:08 PM

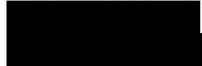
External Email: Use caution with links and attachments

Hi All,

As a private individual and resident of the City of Fresno, I am making the following comments.

Because I spent a lot of time with that General Plan in a previous job, and it matters to me still.

-Christine Barker-Dominguez

 (personal, please strike from any publication of this comment)
(personal, please strike from any publication of this comment)

A1

Page 25- Category 1G: The proposed activities are focused on a low-opportunity neighborhood. I think the City should propose additional incentives and activities in areas of high opportunity, especially given the recent clear and continued public resistance to *market rate* multifamily that are in compliance with zoning and the General Plan. The Parkway Master plan is an important step to address previous environmental injustices, but it's still building affordable housing in one of the neighborhoods with the worst AQ in the City and highest asthma rates, next to a giant highway....

There are so many other ways the city could propose to incentivize to increase affordable housing development in a range of types....

A2

Page 27 - Category 2A: we need multifamily in all parts of the city, and the One Fresno strategy points to that, but the ministerial approval needs to follow too, beyond single family and duplex... Can't single family lots already have up to 4 units according to state law? The description of City of Fresno activities doesn't show multiple housing types like the description says, it just describes single family types... Downtown density is important but not nearly enough.

A3

Page 28, Category 2C: same comment as Page 25: 1G... The City should be proposing clear and consistent ways to build multifamily units in areas of high opportunity and streamline that development process. Downtown density is important but not nearly enough.

A4

Page 28, 2E: I wonder about using City resources to host neighborhood meetings to build opposition to the development of multifamily units that are in compliance with the General Plan and zoning. Can that be a policy? It might reduce discriminatory decisions...

A5

I'd also love to know/see how the city might adopt policies on continuously educating elected officials and the community at large on the importance of pro-housing policies, procedures and actions.

A6

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Response A1: These are introductory comments and do not need a response.

Response A2: The Parkway Master Plan was provided as one example of a way in which the City meets the criteria of this program and is a plan for mixed-income development, not affordable housing alone. Housing Element Program 2 commits the City to increasing affordable housing opportunities in high opportunity areas in a variety of ways.

Response A3: Category 2A is for “Establishment of ministerial approval processes for multiple housing types, including, for example, single-family, multifamily and mixed-use housing.” The City of Fresno provides for ministerial approval of all housing types in the Downtown zones, which extend beyond the downtown core, for single-family homes and duplexes, and for ADUs per State law. Housing Element Programs 2, 4, and 25 commit to additional actions to create a variety of housing opportunities citywide; reduce barriers to housing; and streamline the development review process.

Response A4: Category 2C is “Documented practice of streamlining housing development at the project level, such as by enabling a by-right approval process or by utilizing statutory and categorical exemptions as authorized by applicable law.” The use of applicable statutory and categorical exemptions is citywide, including areas of high opportunity. Further methods of streamlining processes citywide will be identified through implementation of Program 4 of the Housing Element, as described in 2C.

Response A5: Housing Element Program 10 commits to robust year-round engagement in addition to the City’s annual reporting obligations. This includes education and workshops such as the one held in conjunction with the prohousing informative meeting on August 20. Staff commits to continuing to host public workshops on housing-related topics and policies to provide an opportunity for the public, including elected officials, to receive detailed information and ask questions outside of agendaized hearings and decisions. City staff will utilize these efforts to expand education about the importance of prohousing policies, housing diversity in all parts of the City, and the legal requirements regarding housing approvals. This commitment will be added to the Prohousing Application for enhancement points in Category 8 under Category 2N.

Response A6: Refer to response A5. In addition, Program 26 of the Housing Element commits the City to ongoing education and dissemination of information around fair housing in a variety of ways.

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Comment B – Meeting Participants | Informative Meeting, August 20, 2025

B1. There are tools provided by the State regarding encampments for people experiencing homelessness, they confirm best practices of working with residents in a compassionate way. Why are the answers to the questions [in Appendix 5] all wrong? The City is lying. Would like to see people treated with compassion.

Response B1: As documented in Appendix 5, the City of Fresno affirms our full compliance with USICH's "7 Principles for Addressing Encampments."

B2. The application mentions United States Interagency Council on Homelessness' "7 Principles for Addressing Encampments" and would like to see the City follow these principles.

Response B2: As documented in Appendix 5, the City of Fresno affirms our full compliance with USICH's "7 Principles for Addressing Encampments."

B3. Could you please ensure that there is a reference to the expansion of the mobile home replacement program. Many mobile home parks need this assistance. I've spoken with neighbors who don't qualify due to the build year of their home.

Response B3: The City recognizes that some residents do not qualify for the City's Mobile Home Repair Program due to the age of their mobile homes, and is currently developing a program to assist those with older mobile homes. The City commits to submitting this draft program to the State of California for approval no later than November 2025. This will be added to the Prohousing application under category 4C.

B4. Despite working on many initiatives, it doesn't always feel like the City is prohousing. For example, TOPA hasn't gotten traction yet and the Cottage Development text amendment is moving forward very slowly. There's not enough transparency with projects that are going on. It would be helpful to get more regular updates and opportunities for us to be involved.

Response B4: Housing Element Program 32 commits to a timeline for consideration of an Opportunity to Purchase Act. The former Cottage Development text amendment has been re-packaged with other housing-related amendments to the development code and is expected to be brought to City Council for consideration in early 2026. The City recognizes the value of updating and involving community groups that have been engaged in our work products and commits to doing so as staff resources allow. This will be added to the Prohousing application for enhancement points in category 8 under category 2N.

B5. The category regarding favorable zoning in locations with amenities does not seem strong because a lot of affordable housing is not located in high opportunity area. People are getting pushed out to areas without services and amenities.

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Response B5: Housing Element Program 2 commits to a range of actions to create a variety of housing opportunities in high resource areas. The City utilizes geospatial data to track progress towards this Program. Since 2021, the City has facilitated construction of 534 units in high and highest resource areas.

B6. How can we bridge the distance between the programs that staff is working on and City Council? We want to help make that bridge with community members to support these programs.

Response B6: Housing Element Program 10 commits to robust year-round engagement in addition to the City's annual reporting obligations. This includes education and workshops such as the one held in conjunction with the prohousing informative meeting on August 20. Staff commits to continuing to host public workshops on housing-related topics and policies to provide an opportunity for the public, including elected officials, to receive detailed information and ask questions outside of agendaized hearings and decisions. City staff will utilize these efforts to expand education about the importance of prohousing policies, housing diversity in all parts of the City, and the legal requirements regarding housing approvals. This will be added to the Prohousing application for enhancement points in category 8 under category 2N.

B7. Are we putting in prohousing something to address the housing that people will lose from Fresno Housing's HUD funding requirements due to their immigration status?

Response B7: The Fresno Housing Authority continues to advocate for affordable housing resources to serve all residents of our community.

Comment C – Pedro Martinez, Leadership Counsel for Justice and Accountability | City Council Hearing, August 28, 2025

C1. We urge the City to include meaningful actions to combat fair housing issues through policies and programs recommended by residents during the August 20th workshop held by the City. The Prohousing application guidelines state that the city will consider comments, including incorporation of comments into the application and prohousing policies as appropriate. The current application states that the City has met those requirements, but during the August 20th workshop community members were informed that no new policies were being incorporated into the Prohousing designation application, even after the workshop. This is contrary to the application guidelines and the State's mandate to Affirmatively Further Fair Housing through its engagement to the community to proactively solicit and incorporate input.

Response C1: City staff stated at both informative meetings that the draft application included only actions that are already underway, ongoing, or complete; and that the application contains one example of how the City meets the criteria in each category. Staff did not state that new program recommendations would not be considered. A number of additional programs with timeframes and objectives are included in the Housing Element adopted by City Council in December 2024. Per Prohousing program requirements, public comments are being considered and incorporated as appropriate.

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Comments made at the August 20 meeting that are being incorporated include those related to eligibility for the Mobile Home Repair Program (see comment B3), those related to regular updates and engagement with community groups (see comment B4), and those related to education around prohousing policies (see comment A5).

C2. We strongly urge the City to incorporate the rent control and just cause ordinance in a program to codify the eviction protection program in the municipal code under the enhancement category which will go beyond State law requirements in reducing displacement of lower income households and conserving existing household stock that is affordable to lower income households. And we urge the City to incorporate an inclusionary housing program under category one for favorable zoning and land use.

Response C2: Refer to Housing Element Program 34 for a timeline and objectives regarding the Eviction Protection Program. Rent control and inclusionary housing programs were considered during development of the 2023-2031 Housing Element and not recommended.

C3. The City must go above and beyond what is already in their Housing Element or other City plans to ensure their community needs are met with this application. Additionally, we encourage staff to speak and collaborate with organizations that work directly with unhoused communities to ensure that you are properly following the seven principles for addressing encampments.

Response C3: The City collaborates with more than 100 homeless service providers through the Fresno Madera Continuum of Care and as documented in Appendix 5, the City of Fresno affirms our full compliance with USICH's "7 Principles for Addressing Encampments."

Comment D – Brandi Nuse-Villegas | City Council Hearing, August 28, 2025

D1. I want to agree with the statements made by Pedro and Leadership Counsel. I do appreciate the many efforts to increase affordable housing and the work of the Fresno HCD such as the partnership with Cesar Chavez Foundation and 2S and while I cannot speak for all the residents I want to share that several years ago I assisted a woman in getting into senior housing with them and even after being placed they demonstrated to me great care. I support that.

Response D1: These are introductory comments and do not require a response.

D2. I want our City to be truly prohousing in addition to meeting the requirements of the State, and I'm grateful that one of the things they require is meeting the US Interagency Council on Homelessness' Seven Principles for Addressing Encampments and that they believe that to be crucial, and stress that the City take it to heart and hold our City accountable. The experience of our unhoused that we've been told and what they have told us, reading the principles and what we have seen, have shown that the City is not following these principles. There's a lot more than I can voice in three minutes, regarding the principles one through four that the outreach team goes out to the unhoused and works to identify shelter, which is very limited.

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However, principle one states in addressing encampments that there be collaborations with many entities including those unsheltered and advocates and that principle two requires engagement in the encampments and this is simply not happening, but this would lead to solutions and concerns being addressed. Our unsheltered are not being brought to the table. Regarding outreach, it is separate from the rest of the encampment resolution and harsh activities of displacing people and throwing away their belongings is against principle four. Most of the time, no one is there to assist them and isn't there when HART police and sanitation are displacing those encampments and their rights and dignity are not being protected. People are cleared even if there is no viable shelter and are often not given notice, and certainly in most cases HART does not offer nor honor requests to provide storage. The document states that storage is needed so that it does not become an impediment and that community should take care to avoid destroying personal belongings. In fact, they do not do this. In fact, in a vivid example that I experienced this year, I came upon a clearing in which they asked me and I could have collaborated to hold someone's dog so that they can move their belongings. But once I did that they proceeded to throw away those belongings and even when we asked for them to store it, they threw it away, including a wheelchair. They did not offer shelter. The only solution often stated by HART is to go to Poverello House, which is redundant, or not come back. In addition, it states that jurisdictions prevent criminalization of those unhoused, but that's continuing to happen, even in the ordinance. In policy five, the City needs to include more varied response. Note that their solutions listed in the guidelines other creative actions that we have suggested that could facilitate success that do not minimize dignity and agency such as storage units and mobile health crisis teams...

Response D2: The City values feedback regarding our homeless service response system and as documented in Appendix 5, the City affirms our full compliance with USICH's "7 Principles for Addressing Encampments."

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Comment E – Pedro Martinez, Leadership Counsel for Justice and Accountability |
September 12, 2025



California's
Statewide Organization
for Renters' Rights



September 12, 2025

Prohousing Designation
Long Range Planning
Department of Planning and Development
2600 Fresno Street, Rm 3065
Fresno, CA 93721

Sent via email to longrangeplanning@fresno.gov

RE: City of Fresno 2025 Prohousing Designation Application

Dear Planning Staff,

The undersigned community-based organizations work alongside vulnerable communities throughout the City of Fresno; communities that have long been disinvested in. We appreciate the City's willingness to reapply to the State's Prohousing Designation application. The designation will support the City's ability to implement programs that will better the quality life of all Fresnoans. The application guidelines state that a jurisdiction goes above and beyond state housing law to produce affordable housing and keep vulnerable populations housed; as well as acting with deference to the unhoused population. This is an important opportunity for the City to include strong, meaningful, policies and programs in the current prohousing designation application.

E1

Fresno's housing crisis is deepening due to high rent, limited affordable housing, and income inequality. The City of Fresno had rent increase up to 48% between January 2020 and August of 2024; rents increased from \$1,075 to \$1,591 per month.¹ Moreover, the City of Fresno ranks among the top 20 most severely cost burden cities even as it attempts to administer affordable housing. For example, "the Link," an 88 unit affordable housing development is not affordable since residents have to earn at least \$21 dollars an hour.² That is 1.5 times more than what a full

E2

¹ Sheehad, T. (2024, September) Fresno ranked among top 20 most severely cost burdened cities. Here's where the city falls: [Here's by how much, and where: Housing costs and rent up in Fresno, Valley since 2020. Here's by how much, and where.](#)

² Garibay, C. (2022, August). Fresno ranked among top 20 most severely cost burdened cities. here's where the city falls: [Fresno Bee. Fresno CA is severely cost burdened compared to other cities.](#)

2210 San Joaquin Street, Fresno, CA 93721
Telephone: (559) 369-279

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time employee earns. Low income communities of color, particularly Latine and black households, are disproportionately impacted in comparison to white households in terms of ability to afford the median home price with Fresno's 18% affordability gap, the biggest in the Valley.³ According to the U.S. Census (2021) 92.6% of Fresno residents earn below \$20,000 annually and are spending more than 30% of their income on housing, making them housing burdened."⁴ Therefore the City must incorporate programs and policies that will directly and effectively help families by creating affordable housing and ensuring families remain housed.

E2,
cont.

In order to earn prohousing designation, the City of Fresno must meet certain threshold requirements such as diligent public participation process, programs and policies from four different categories, housing element compliance, and confirmation that its treatment of encampments on public property complies with and will continue to comply with the constitutional rights of persons experiencing homelessness. The City held a prohousing designation application workshop on August 20, 2025, residents voiced several housing concerns as well as shared recommendations for policies and programs the City should add to their application. Unfortunately, City staff made it clear to residents that they would not include any community recommendations to the application. This is contrary to the application's requirement of "diligent public participation" and community engagement. Community-identified programs will strengthen the application and address critical housing needs, therefore we urge the City to incorporate the following policies and programs in the application.

E3

1. Rent Stabilization and Just Cause Ordinance.

A rent control and just cause ordinance is an effective tool to keep people housed. Many tenants in the City of Fresno rent single-family homes or live in units that are exempt from the Tenant Protection Act (2019). A local ordinance would allow the City to include these exemptions and go above and beyond state law in protecting vulnerable tenants. It would limit annual rent increases, promote stability, allow tenants to save money and spend in the local economy. Additionally it would establish reasonable annual increases and allow for landlords' right to a fair return on their investment. Pairing this with just cause for eviction would limit unlawful evictions. Landlords would be required to state a specific reason to evict a tenant and would prevent displacement of low income people of color. This is a meaningful policy that would meet the requirements for the enhancement category.

E4

2. Codifying the Eviction Protection Program into Municipal Code.

E5

³ Orihuela, P. (2024, May). Black and Latino Californians face the greatest barriers to homeownership, new study says. That's almost 60% of Fresno: [FresnoLand: Black and Latino Californians face the greatest barriers to homeownership, new study says. That's almost 60% of Fresno](#)

⁴ U.S. Census Bureau (2021). American Community Survey 1-year estimates: [2021 ACS 1-year Estimates](#).

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Residents also identified the need to codify the Eviction Protection Program (EPP) in the City's municipal code. This would also meet the requirement under the enhancement category by going "beyond state law requirements in reducing displacement of Lower-Income Households and conserving existing housing stock that is affordable to Lower-Income Households." This would promote housing stability and prevent displacement of low-income tenants. Since the adoption and implementation of the EPP, it has kept hundreds of families housed.

E5,
cont.

3. An Inclusionary Housing Ordinance.

An inclusionary housing program meets the requirement for category one for favorable zoning and land use. This policy can help the City meet its Regional Housing Needs Allocation (RHNA) requirements for extremely-, very-, and low income units when building market rate housing. The City was unable to meet its 5th cycle RHNA, this policy can ensure that the City meets its 6th cycle RHNA requirements. Residents have consistently advocated for housing in high opportunity areas and this will allow an increase in housing choice and affordability, particularly for low income communities of color. This is a critical policy that will create meaningful benefits and allow the City to affirmatively further fair housing.

E6

4. Streamlining Ordinance to rezone land in high and relatively higher resource and income areas for higher density development.

Earlier this year the City drafted the Fresno Housing Streamlining Ordinance. LCJA, along with community residents and partner organizations, expressed support if the text amendment language was amended to include stronger language that would include buffer zones for housing built near or around heavy or light industrial zones, polluting sources, or major state highways. Additionally, we asked for language to be incorporated to ensure affordable housing is built equitably throughout the City, not just in low resourced areas. This program ensures affordable housing can be built in high resourced areas and that families who have been historically disenfranchised have access to better opportunities. Creating more affordable housing in these neighborhoods combats effects of de facto segregation as it allows access to better resourced schools, access to healthcare, and employment opportunities improving overall life satisfaction. A study by the American Economic Review (2016) found that children who move into high resource neighborhoods experience an improvement in their educational outcomes and higher lifetime earnings - breaking the cycle of intergenerational poverty⁵. Unfortunately, the City voted to remove all ministerial approval components to the ordinance. This policy, along with mitigation measures, would ensure affordable housing is built in high resourced areas.

E7

⁵ Chetty, R., Hendren, N., & Katz, L. (2016). The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment, 104(4), 855–902. <https://doi.org/10.3386/w21156>

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5. Adequate engagement with the unhoused community and organizations that work directly with the unhoused community.

Finally, the prohousing designation application requires the City to follow the “7 principles for addressing encampments.” We strongly urge the City to reform their encampment resolution response in accordance to these principles, including collaboration with organizations that work directly with the unhoused community, encampment residents, and others be equipped to advocate for the rights and needs of encampment residents to ensure that the City is enacting best practices related to the treatment of unhoused individuals camping on public property. The city is deficient in adequately addressing the principles and ensuring the constitutional rights and dignity of those who are in encampments. We have observed that while there are outreach teams and others working to identify and place encampment residents in shelters and housing, ongoing encampment resolution by HART focuses on displacement, with those affected stating that their belongings are discarded without storage provided and that residents are being criminalized for being present on public property when they lack other option. The City needs to develop alternative outreach systems and support systems that do not involve the Fresno Police Department HART team which further criminalizes community members, undermines the efforts by homeless services providers, and impedes residents from permanent housing solutions. We also need stronger systems of accountability based on centering and bringing to table the voices of those affected to ensure that services and needs are met.

E8

Once again, this is a critical opportunity for the City to incorporate meaningful policies and programs that will further equitable development of affordable housing throughout the City and ensure vulnerable residents are protected from displacement. Thank you for your consideration of our comments. If you have any questions and would like to further discuss our comments please contact Pedro Martinez, Policy Advocate, at pmartinez@leadershipcounsel.org. We look forward to collaborating with the City to advance access to safe, affordable housing for all City of Fresno residents.

E9

Sincerely,

Pedro Martinez,
Housing and Land Use Policy Advocate
Leadership Counsel for Justice and Accountability

Marisa Moraza
Political Director
Power California

2210 San Joaquin Street, Fresno, CA 93721
Telephone: (559) 369-279

City of Fresno 2025 Prohousing Application Response to Public Comments

Shar Thompson
Central Valley Regional Coordinator
Tenants Together

2210 San Joaquin Street, Fresno, CA 93721
Telephone: (559) 369-279

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Response E1: These are introductory comments and do not need a response.

Response E2: This paragraph contains background information on existing housing conditions and impacts in Fresno, but not specific recommendations, therefore does not need a response. Responses to specific recommendations are provided below.

Response E3: City staff stated at both informative meetings that the draft application included only actions that are already underway, ongoing, or complete; and that the application contains one example of how the City already meets the criteria in each category. Staff did not state that new program recommendations would not be considered. A number of additional programs with timeframes and objectives are included in the Housing Element adopted by City Council in December 2024. Per Prohousing program requirements, public comments are being considered and incorporated as appropriate. Comments made at the August 20 meeting that are being incorporated include those related to eligibility for the Mobile Home Repair Program (see comment B3), those related to regular updates and engagement with community groups (see comment B4), and those related to education around prohousing policies (see comment A5).

Response E4: Rent control was considered during development of the 2023-2031 Housing Element and not recommended. Adopted Housing Element local Policy 7.2 commits the City to “Protect residents from displacement and homelessness by preserving naturally occurring affordable housing and continuing to prohibit eviction without ‘just cause,’ enforcing the adopted limitations on rent increases, and promoting agencies and service providers offering foreclosure services.”

Response E5: Housing Element Program 34 commits to a timeline and objectives regarding the Eviction Protection Program.

Response E6: Inclusionary zoning was considered during development of the 2023-2031 Housing Element and not recommended.

Response E7: This comment appears to mischaracterize or conflate several City policy and planning efforts. There is no policy titled the “Fresno Housing Streamlining Ordinance.” The City approved a number of text amendments intended to reduce barriers to housing development in June 2025, and approval of an ordinance to allow residential development in office zones is pending final review by City Council. LCJA’s noted comments were not provided to City staff in relation to either of these policies.

Response E8: The City of Fresno provides outreach through homeless service providers that employ those with lived experience, not through the Police Department. The City, through its membership and active participation in the Fresno-Madera Continuum of Care engages those with lived experience to shape its work and policies.

Response E9: These are closing remarks and do not need a response.

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Response to Public Comments

Comment F – Brandi Nuse-Villegas | September 13, 2025

I appreciate that the city is working on gaining more affordable housing and all the ways that the departments are working on ways to increase access to affordable housing. I have seen the efforts and achievements to implement policy that promotes affordable housing, such as mixed use, land and housing trusts, Universal Design standards to ensure accessibility and other standards are maintained and Brownfield to mitigate contamination. We have seen the development of housing that our community, including those unhoused have accessed through policy, such as ministerial approval downtown, which has resulted in Monarch apartments that uses infill development, and also recognize the importance of the city's incentives for infill building. I appreciate that in these collaborations, housing was done in a way that considered aesthetics that uplift the community, such as calls for murals and sculptural elements at these locations. I have sat in on meetings with organizations with local housing trust fund with Planning and Community Development and encourage these collaborations to continue with community groups. I am pleased to see that that has resulted in multiple housing funding, such as Hacienda Mobile Home parks, as housing for farmworkers, as well as Avalon Commons.	F1
I appreciate that there has been general allocated for supportive housing for those who are unhoused, including youth, with Welcome Home and City Studios. My hope that is there would continue to be more housing prioritized, in addition to the project on Divisadero, that is earmarked specifically for those who are unhoused, especially focused on high opportunity areas, as the city has recognized as a need, as they have a particular challenge in getting into housing and, as Project Homekey converts shelters into affordable housing and our shelter space is decreased, there is a need to ensure our community that is sheltered and unsheltered have a permanent solution as we deal with the immense need for more accessible permanent housing.	F2
Because of this, our Rapid Rehousing program is important and should continue to be maintained, as well as other programs such as the Eviction Protection Program, the mobile home repair program, and such.	F3
Efforts to facilitate home ownership through first time homeowner assistance is also crucial and I recommend also working with community groups, and for community groups to assist the department, to promote information regarding access to Llaves De Tu Casa Iniciativa and other programs.	F4
It was important that the city implemented ADU policies to allow for tiny homes on wheels and other ADUs as well as making such housing plans available to the public to make it easier and more accessible to build.	F1 cont.
I also appreciate the partnership with Fresno City College to build tiny homes. One area of concern is that these tiny homes have not yet been provided to our community members who are unhoused. We need to ensure that the barriers to creating tiny homes for our unhoused are overcome and made a priority.	F5
I am excited about partnerships with Cesar Chavez foundation in affordable housing. I had a positive experience with Cesar Chavez Foundation when I was assisting an elderly woman who needed housing and one of their apartments opened up. They were helpful in the process of getting her in when she was accepted and continued to show care.	F1 cont.

City of Fresno 2025 Prohousing Application Response to Public Comments

Having organizations like this assisting with housing in the development of the Parkway plan is important.

F1
cont.

It is important to streamline the process for affordable housing in a responsible way, and so recognize the importance of the city prioritizing and ensuring that that “planning processes for affordable housing, as well as housing in the Downtown Planning Area and the Inner City Fee Program area, are targeted for completion within 75 business days” and that there is a pre-review by multiple agencies, such as fire department as well as public works to ensure important elements are not overlooked.

As community oversight is important, I appreciate that members of the public can access that information online and be on a mailing list for updates in developments, as they also have a mailing list to be notified of meetings, hearings, and other public notices and I would request that this access would be publicized so that people know they have access.

F6

I also appreciate that while accessibility in community engagement is a challenge, those in the department have been open to suggestions with meetings, such as exploring how to reach people in locations of community meetings and, if I recall, having a set up during our monthly downtown arts event.

F1
cont.

In addition to the above mentioned, I agree with the requests presented on August 28 by the Leadership Counsel for Justice and Accountability that the city incorporate a rent control and just cause ordinance and a program to codify the eviction protection program in municipal code.

F7

Regarding addressing encampment resolution

I want our city to truly be pro-housing in addition to meeting the requirements by the state, I am grateful that one of those requirements is that the city respect the constitutional rights of people and follow the US Interagency Homeless Council’s seven principles for addressing encampments and that they believe these to be crucial to address and I stress that the council hold our city accountable by it and the city hold our council to it and work towards a multi-entity encampment response that centers the needs and voice of the encampment residents and addresses failures to protect their rights and dignity.

F8

Regarding Principle 1:

The USIHC lists a variety of people who should be part of a multi-sector response, including those in the encampments, advocates with lived experience, faith groups, etc.

F9

City of Fresno 2025 Prohousing Application Response to Public Comments

and that law enforcement should not be driving addressing encampments on public property. If those with lived experience and others whose concern was to the needs of the encampment residents were at the table and involved actively, then the concerns brought forth could be actively addressed and solutions developed, as well as a greater understanding. In reality, this isn't happening.

While there are different groups that are part of homeless services, which include identifying shelters, housing, and other resources and seeking to assist those who are unhoused in accessing these services, there is an apparent disconnect between those working towards meeting the needs of those who are in the encampment with the overall plan and daily activity of encampment clearing.

Addressing encampments is largely done by code enforcement, law enforcement, and public utilities in decision making, despite the principles stating that law enforcement should not be driving encampment resolution.

The USIHC lists a variety of people who should be part of a multi-sector response, including those in the encampments, advocates with lived experience, faith groups, etc. and that law enforcement should not be driving addressing encampments on public. In reality, this isn't happening.

In addressing encampments, beyond HART outreach, the entities that would account for the needs of the encampment residents are neither at the table in planning, nor included in assisting those who are at the encampments. We need them, including those who would ensure their rights are being protected, including, but not limited to having rights experts involved, such as those working in disability, elder rights, etc and shape how we can resolve encampments guided by those who would understand the challenges our community faces.

We need to approach encampment resolution differently without law enforcement driving daily activity.

In fact, when those in many of these sectors have addressed issues, from members of faith groups, organizations such as a human trafficking prevention entity, community groups, those with lived experience, such as opposing criminalization through the ordinances, mistreatment, discarding of belongings, and refusal to store during encampment resolutions, as well as solutions, such as asks for lived experience board and efforts to bring those unhoused to the table, for alternative services such as for warming centers to be opened continuously, safe lots and camps, storage, sanitation, etc if there has been dismissal and minimization.

We have had city commissioned consultants and groups who have involved community engagement and input who have have addressed needs regarding encampments as part of their recommendations:

The Commission for Police Reform in 2020 recommended that the Fresno Homeless Taskforce be eliminated based on their findings. The current "Homeless Assistance and Response Team" continued to do the same practices that were critiqued regarding the Homeless Taskforce, but with an outreach team added that didn't address problematic

F9,
cont.

City of Fresno 2025 Prohousing Application Response to Public Comments

activity.

Consultants paid by the City of Fresno to create a list of recommendations on displacement avoidance, through research and extensive community engagement, recommended ending encampment sweeps.

HART has impeded advocates who volunteered to help move belongings on multiple occasions and in at least one instance, an advocate was arrested for trying to preserve and move the blankets of encampments residents that HART refused to allow the resident to take or have stored. The city passed a policy to prohibit people from being on site during an abatement which would keep advocates from helping and observing. This was overturned by a judge.

I am concerned that organizations that are funded by the city may have their voice diminished out of concern of having their partnership affected.

F9,
cont.

Principle 2.

We need to consider what actual engagement according to the principles could look like.

As mentioned in the application, the outreach team goes out to people who are unsheltered to assist in finding shelter and housing options. We are aware that because of the lack of affordable housing and the shelters having very little open spaces, that many are waiting for something to be available.

I observe however, the USICH description suggestions more engagement, such as involvement and discussion, as well as agency on the part of the residents regarding solutions.

From communication with those with lived experience, the reality of the daily encampment clearings (including Sundays and holidays) is that outside of the field outreach, there aren't discussions undergone if someone isn't able to be sheltered/housing before the next clearing they experience. There are no discussions about alternative actions other than commands from police to no longer be at that location.

The part of the response team that clears encampments on a daily basis, HART, does not prioritize or ensure that housing or shelter is available and provided.

On Public property, there is rarely notice or a heads up regarding an encampment clearing by HART; any notice is usually in special circumstance clearings and in these, if there is no viable shelter available, they are simply warned to leave by the date posted.

In past encampment clearing, advocates, not part of the city's encampment resolution team, have dialogued with encampment residents regarding their needs, including issues with people not being able to go to an available shelter because they couldn't take their dogs or because the area the shelter was located was not safe for them. These items were not heard or taken into consideration by those clearing the encampments. In one instance, the mayor was present and when the issue of safety at Parkway was brought up to him, he said that all areas of town can be unsafe.

There was progress with the low barrier shelters, as before that, the community

F10

City of Fresno 2025 Prohousing Application Response to Public Comments

lacked shelters that would take pets and the entities involved in housing recognized and made accommodations as “low barrier.” We need to continue that effort to recognize and overcome barriers.

The use of the word “refused services” shows a lack of addressing viable reasons why someone may not accept what is given as well as the fact that services offered may not include shelter and may not be something that they need.

We have heard from people who refuse to go into a shelter and the concerns have ranged for the trauma of being there temporarily and having to give up belongings only to be back on the streets because their time had run out, to not feeling safe in the shelters because of the treatment of staff or because of the location, to the shelter not accommodating something important, like pets, all indicating that there are issues within the services themselves that need to be addressed.

The response HART law enforcement to “where do we go?” Has been to go to Poverello House, which does not address where to sleep. Especially as people are already on waiting lists, or “not here”

The policy notes that a response should include “housing solutions that are customized to individual needs” While the outreach may be able to accommodate people according to their needs, the issue is often that if there is anything available, they are limited to what’s available.

Regarding harm reduction, there are organizations that do harm reduction that have been helpful but they are not part of the city’s encampment resolution response.

F10,
cont.

Principle 3

As mentioned before, rapid rehousing is an important service that needs to be continued.

There has been the development of provision of some needs such as showers for those who can access them and I am aware that those services are expanding, which hasn’t been mentioned. We would love to see these in more areas of the community.

People in encampments have asked for and suggested things such as greater sanitation provisions and trash bags/cans, as well as access to toilets, water, etc.

Outside what the outreach team might bring, HART actively deprives people of basic needs. In their encampment displacements, they throw away living supplies that people provide for themselves, including food, clothing, pet food, medication, etc. One gentleman informed me this past year that HART took his prosthetic leg to which the team was dismissive. This deprivation not only threatens one’s well-being, both physically and psychologically, but as someone who experienced a sweep and his belongings had stated, it stops people in their process of doing what they need to do to get housing, because they have to focus on replacing what they need to survive.

F11

There is a need for those who are licensed medical health providers to engage and ensure their needs and dignity are being supported. There is no one ensuring that people are treated with dignity during a clearing and that any disabilities have needed accommodations. In one example where HART was on Irrigation District property, the representative for the irrigation district gave an disabled woman extra time and HART law

City of Fresno 2025 Prohousing Application Response to Public Comments

enforcement spoke to the person and had it rescinded. Disabilities rights laws require that those who need accommodations are able to be given such, but this accommodation is not provided nor are those in need of it notified they have this right.

There are mobile medical assistance that I have seen set up regularly, though sweeps often cause people to lose access to these services if they have to leave an area, and these would be important to support and expand, and also have a voice in encampment resolution and solutions. The residents have also asked for mobile mental health services or for licensed mental health professionals to be part of outreach on the field, which is needed. We need people who can assist those who have disabilities and mental health needs, including anxiety. In many clearings, HART escalates anxiety, which is a hindrance to those who become immobilized by anxiety in a threatening environment, with the risk of further mistreatment and possible arrest, loss of pet, etc.

In one example I witnessed on private property, an officer came in and immediately yelled at individuals, who I had been assisting with moving belongings and were stressed, to get out and when a man responded by saying they were moving, the officer escalated and physically forced him off the property while yelling at him.

Regarding storage: When offered a shelter, people are often limited to two garbage bags to take all of their belongings, which has been an impediment for those who needed a way to store other belongings. There is a need for storage for this purpose as well as for those still waiting for shelter that would allow for people to better access services, go to work, and not worry about their belongings being taken.

We have brought up the idea of having storage units for people, such as San Diego, but many of our ideas haven't been heard.

Additionally, during encampment clearings, HART rarely stores belongings, even if the items aren't those prohibited due to health and safety risks. The city says in the municipal code that the city will store belongings and that owners of the belongings have 60-90 days to reclaim them. However, in practice, HART rarely stores belongings to the extent that people who are being displaced and having their belongings thrown away don't even ask. People have told me that "When you see HART" all you will be able to take with you is what is in your hands already."

I witnessed multiple occasions, including those in which their belongings were already on a cart and ready to go, where HART refused to allow individuals to take their belongings and also refused to store. On several occasions, I asked for the items to be stored on their behalf after asking if they wanted their belongings stored if they couldn't take them.. Law enforcement told me that sanitation staff made the call about storage and then prevented us from getting to the belongings and threw everything away, including items that were obviously not health and safety risks. However, we have also witnessed many occasions when HART could have also simply allowed the individual to take their belongings and leave and they refused. I witnessed them throw away a backpack that someone asked for. Many people have told me that HART has taken purses, backpacks, and phones.

F11,
cont.

City of Fresno 2025 Prohousing Application Response to Public Comments

In one situation in 2024, similar to other examples, on private property, people told me that they signed up for shelter with the outreach team but upon follow up were informed that there was no shelter room available. This included a woman who was dealing with an injury due to a chronic illness who had to move her belongings. Less than an hour after they left the property during a clearing overseen by HART law enforcement and had their belongings on public property temporarily, another HART team came and took their belongings.

F11,
cont.

Principle 5

As shelter and housing is extremely limited, we need to dialogue with the community and implement alternative shelter options. Advocates have suggested ideas such as small (and small is key), well-managed safe camps and safe lots for those with vehicles, which have been refused or ignored by the city council. There were also options that have been promised, but not materialized yet, such as tiny homes, though there are limited numbers of cabins that Poverello house provides. We have a severe lack of affordable housing and need to continue to dialogue and develop solutions that don't warehouse our community and ensure they are in a place that is safe for them. If an option is not viable at the point, there at the very least need to be a realistic understandable and accompanying compassion and respect that people simply are where they are for lack of options and treated

We also need to ensure that the shelter and housing options are safe, both physically and in the treatment by those in authority over those in these facilities. There is still a need for a comprehensive system of accountability. Many people have shared that they were not treated with dignity and respect. There have been concerns voiced regarding the exiting process, and people potentially being exited unjustly. There needs to be a system to ensure that there is consistent provision of needed services and oversight.

F12

The city stated that they "Include how strategies involve alternative measures to criminalization, focusing on service engagement and harm reduction" I would like clarification of what the city means regarding the outreach team utilizing harm reduction strategies as this is important.

The city has more aggressively taken measures of criminalization in the past year, and have not addressed concerns that necessitate harm reduction.

In September 2024, the city of Fresno's ordinance on sitting, sleeping, camping on public property resulted in hundreds of arrests. Following the ordinance, hundreds of people were arrested for being on public property who had nowhere else to go. Some were arrested for simply standing. Several people told me they were arrested for camping even though they were waiting for a recycling center to open. I heard from one woman who was in a shelter and was arrested for violating this ordinance while visiting her uncle, who was unsheltered.

During this time, people were given the option to accept drug treatment or be arrested, even if they didn't have a need for treatment, resulting in people who declined treatment they didn't need being arrested and those who did accept were sent to facilities

City of Fresno 2025 Prohousing Application Response to Public Comments

even if the treatment center had no room.

Again, during a displacement, HART does not ensure that there is access to shelter.

However, even before this ordinance, HART has been criminalizing those who are unhoused, rather than solutions that avoid criminal record. In 2022, for example, I witnessed an elderly disabled woman be forced to move, without being offered shelter, from a dirt patch in between a paved sidewalk and the fence. The officer said that the dirt area was also the sidewalk and that she would be cited if she didn't move.

As previously mentioned, HART police routinely threaten to cite or arrest people if they impede HART from throwing away their belongings, and in some cases HAVE arrested people who tried to keep belongings from disposal. Many people simply allow their belongings to be taken for fear of arrest. In addition to having belongings taken, they have told me that they have been yelled at and/or mocked and when they have asked for important belongings, like medication, multiple people have told me they were told "Too bad."

F12,
cont.

Principle 6

I am aware there is an ongoing effort to identify housing and permanent solutions and that efforts have been made to create more housing. I have had the pleasure to see a number of people placed. We have an immense need for affordable, permanent housing, including supportive housing, which is addressed in the other parts of the application. I believe the outreach team has stated it is doing field work to help people get housing ready, even if shelter is not available.

. Addressing displacement and the issues outlined above would help in addressing this as well as evaluating efforts and accountability that includes centering the voices of those being served to ensure that people are getting their needs met, as those being served can better address any issues that are causing impediments, which is another reason to have those in the encampments and lived experience be part of the city's response.

F13

Principle 7

We observe that the sites are monitored. People do go back to the sites because there is simply no other place for them to go.

F14

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Responses F1-F3: These comments express approval of actions the City has taken. Since they do not contain specific recommendations, no response is needed. Responses to specific recommendations are provided below.

Response F4: Community groups are a key audience for program information and the City regularly includes them in promotions. Additionally, the launch of Llaves De Tu Casa Iniciativa was covered by Telemundo and Univision as well as in English-language media. It has a dedicated, active Facebook page at <https://www.facebook.com/LlavesDeTuCasaWorkshop>. Promotion for this and other programs is ongoing via social media, emails, and other methods.

Response F5: The City of Fresno commits to present a development agreement to City Council for a project incorporating 50 tiny homes by the end of 2025. This has been added to the Prohousing application under category 4D.

Response F6: A sign-up form for notices is available at <https://www.fresno.gov/planning/current-planning/> and this information is regularly shared at Planning Commission meetings. Additional promotion is ongoing via social media, emails, and other methods.

Response F7: Please refer to responses to E5 and E6.

Response F8: The City of Fresno strives to involve as many community partners as possible during the encampment resolution process. In addition to the outreach services provided directly by the HOPE team, a unit of HART, the City provides notice to organizations that assist residents of temporary shelters including, but not limited to: The Fresno Rescue Mission, The Poverello House, St. Benedict Catholic Workers, Central California Legal Services and the Community Alliance Newspaper. Notification to individuals at encampment locations and community organizations is provided at least seven (7) days prior to when an encampment site is scheduled to be resolved. The City cannot compel community organizations other than those contracted by the City to provide services to those individuals located at encampment sites.

Response F9: Regarding Principle 1: The different HART units, while coordinated, operate independently from one another. Each encampment location that is resolved by HART will receive contact from all HART units, but those contacts generally do not happen simultaneously. During the seven (7) day notification period before an encampment resolution, access to the site is not restricted by HART. Organizations and individuals wishing to provide services to the unhoused may do so according to applicable law. After the notification time period has expired, HART PD or other police patrol units may engage with individuals who have remained beyond the posted deadline. HART follows Administrative Order 6-23 (AO 6-23) when resolving encampments. AO 6-23 outlines storage requirements for items of apparent value.

City of Fresno 2025 Prohousing Application
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Response F10: Regarding Principle 2: HOPE Outreach responds to all locations scheduled for clean-up before they are addressed by HART PD and HART Sanitation. These locations are not established encampments, rather they are generally locations that have been reported alleging criminal activity or serve as an immediate threat to public health or safety. While providing outreach the HOPE team explores all alternatives to city shelter which includes diversion to previously unavailable resources by offering to mediate disputes between family or friends or may facilitate placement into other non-City owned or funded shelters. HOPE Outreach will continue to engage with unhoused individuals to develop rapport and support placement into temporary or permanent housing.

Response F11: Regarding Principle 3: The HOPE team operates as a mobile Coordinated Entry System (CES) access site. As such, HOPE is generally the initial engagement point for people experiencing street homelessness. The HOPE team will complete an assessment documenting a participant's housing needs, preferences, and vulnerability. After an assessment the client is prioritized based on the level of need or vulnerability. Finally, appropriate referrals are made, matching persons to available community resources, housing and services. Incidentally, HOPE is a contracted service between the City of Fresno and the Poverello House. The Poverello House is also the CES administrator for the Fresno Madera Continuum of Care. Leveraging their knowledge of CES is a huge asset and ensures smooth implementation of CES requirements policies and procedures.

HART is part of the larger Homeless Services Division at the City of Fresno. The other services offered, like showers and basic needs, are a result of the work completed by the Homeless Services Division. All members of HART promote services and connections whenever possible. The homeless services division has also included licensed clinicians as part of Encampment Resolution Fund (ERF) grants and other applications.

Regardless of location, public or private, the City of Fresno Homeless Services Division strives to protect, assess and connect unhoused persons and families with housing resources. At the same time the City aims to promptly resolve quality of life issues affecting residents and businesses on both public and private properties. If law enforcement determines there are violations of law such as trespassing or theft the Police Department will respond to and handle the situation in accordance with current policy.

Response F12: Regarding Principle 5: In addition to the City of Fresno designating its shelters as low-barrier facilities (housing) and utilizing other harm reduction strategies such as overdose prevention & reversal, and providing drug checking kits through

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partner agencies, the City regularly refers to partner agency services such as the County of Fresno's Needle & Syringe program.

Regarding the City of Fresno's Public Welfare ordinances, any individual charged with violation of such article, in lieu of being taken to jail may, at the election of the citing police officer and with the consent of the individual, be taken to a facility providing social services related to mental health, housing, and/or substance abuse treatment. As an alternative to a fine or jail sentence, the City would encourage the Court to grant diversion or probation with a condition the offender complete a rehabilitation program.

Response F13: Regarding Principle 6: The City has increased its affordable housing development pipeline by 1,644% since 2021 and this application reflects various ways the City is seeking to support additional housing development. As stated, it is accurate that even when temporary shelter options are not available outreach teams will explore direct placement into permanent housing.

The outreach team's members include those with lived experience. Additionally, the City of Fresno is a member of the Fresno-Madera Continuum of Care (FMCoC) which facilitates a Lived Experience Advisory Board (LEAB). When possible FMCoC members, including LEAB members, are invited to participate on City Panels to evaluate proposals submitted to the City for Homeless Services funded programs.

Response F14: Regarding Principle 7: While some locations require a higher level of monitoring it has been the experience of HART that recurrence is generally tied to some anchor condition. This could be familiarity with the area, ease of access, or another illicit variable.

City of Fresno 2025 Prohousing Application Response to Public Comments

Comment G – Bob McCloskey | September 11, 2025

From: [Bob McCloskey](#)
To: [Casey Lauderdale](#)
Subject: Fwd: Public comment on Fresno's Prohousing Application
Date: Wednesday, September 17, 2025 7:44:54 AM

External Email: Use caution with links and attachments

----- Forwarded message -----

From: **Bob McCloskey** <[REDACTED]>
Date: Thu, Sep 11, 2025, 3:16 PM
Subject: Public comment on Fresno's Prohousing Application
To: <ProhousingPolicies@hcd.ca.gov>, <longrangeplannig@fresno.gov>, Jerry Dyer
<jerry.dyer@fresno.gov>

The California State Legislature established the Prohousing Designation Program to incentivize cities to adopt policies that accelerate housing production and to adopt policies for addressing residents experiencing homelessness. These policies must comply with the United States Interagency Homeless Council requirements.

The city of Fresno recently lost the "Prohousing" designation from the state's Department of Housing and Community Development (HCD) to receive priority status for state funding and other incentives, however, it has been given the opportunity to reapply. Before considering the re-establishment of this status, the state must consider how the city deals with encampments and those experiencing homelessness.

G1

The city of Fresno is required to meet the United States Interagency Homeless Council's 7 Principles for addressing encampments. It states that criminalization doesn't solve the issue and that solutions should come with collaboration with those who are in the encampments and center on their needs.

In Fresno, there is no collaboration with the unhoused residents or advocates. In fact, over the strong objection of the unhoused residents and advocates, in September 2024, Fresno implemented a harsh no camping ordinance with penalties of up to a year in jail and a \$1,000 fine for violations. To date, hundreds of unhoused residents have been arrested and cited. Hundreds have lost their property in encampment sweeps, in violation of the 4th Amendment of the U.S. Constitution for illegal search and seizure of property. These facts are well documented by advocates and unhoused individuals.

G2

In addition, although receiving state funding to establish a tiny home village in 2023, the city has failed to do so. The city has used state encampment resolution funding to unilaterally destroy encampments and throw property away without offering housing while often arresting encampment residents.

G3

According to the U.S. Interagency Homeless Council, the principles the city must follow to be re-designated as a "pro housing" city are:

G4

City of Fresno 2025 Prohousing Application
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Principle 1: Establish a Cross-Agency, Multi-Sector Response (which includes those ensuring that the encampment residents needs are addressed, like the residents themselves, advocates, etc.)

Principle 2: Engage Encampment Residents to Develop Solutions

Principle 3: Conduct Comprehensive and Coordinated Outreach

Principle 4: Address Basic Needs and Provide Storage

Principle 5: Ensure Access to Shelter or Housing Options

Principle 6: Develop Pathways to Permanent Housing and Supports

Principle 7: Create a Plan for What Will Happen to Encampment Sites After Closure

G4,
cont.

The City has done none of the above and unless specific commitments are made to address these clear deficiencies, the city of Fresno should be denied pro-housing status. Commitments must be made from the city of Fresno to change its policies and practices, including but not limited to recinding its harsh no camping ordinance before being re-designated as a "pro housing city", a designation I support.

G5

Bob McCloskey, Advocate and Journalist



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Response G1: These are introductory comments and do not need a response.

Response G2: This paragraph contains statements about City of Fresno actions, but not specific recommendations, therefore does not need a response. Responses to specific recommendations are provided below.

Response G3: The City of Fresno commits to present a development agreement to City Council for a project incorporating 50 tiny homes by the end of 2025. This has been added to the Prohousing application under category 4D.

Response G4: This comment contains information about the 7 Principles and does not include a specific recommendation, therefore does not need a response.

Response G5: As documented in Appendix 5, the City of Fresno affirms our full compliance with USICH's "7 Principles for Addressing Encampments."

City of Fresno 2025 Prohousing Application
Response to Public Comments

Comment H – Pedro Martinez, Leadership Counsel for Justice and Accountability |
September 29, 2025



**TENANTS
TOGETHER**

California's
Statewide Organization
for Renters' Rights



September 29, 2025

Prohousing Designation
Long Range Planning
Department of Planning and Development
2600 Fresno Street, Rm 3065
Fresno, CA 93721

Sent via email to longrangeplanning@fresno.gov

RE: City of Fresno 2025 Prohousing Designation Application

Dear Planning Staff,

We submit these comments in response to the Revised Prohousing Designation Application (Revised Application). We appreciate your responses to the comments we submitted during the initial comment period and the opportunity to provide comments on this Revised Application.

While we appreciate that the City's Revised Application includes its commitment - also included in its Housing Element to conduct workshops on housing related topics and commits to expanding eligibility for the Mobile Home Repair Program to homes built before 1980 - the Revised Application still falls short of its potential to commit to meaningful and aggressive programs and policies designed to increase housing access and stability for lower income people in the City.

The Prohousing designation is intended to support the City's ability to implement programs that will improve the quality of life for all Frenans. In our initial comments, we recommended that the City's prohousing designation include several community-identified programs and policies that will help the City achieve the goal of increasing housing access across income ranges. The Revised Application fails almost entirely to include the programs and policies recommended in our initial comments and we reiterate here the importance of including those policies and programs in the City's application. Such actions, taken together, will help break the cycle of intergenerational poverty[1]. We have included as an attachment, and incorporate herein, our

H1

City of Fresno 2025 Prohousing Application

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initial comments, submitted on September 12, 2025. Those comments include several recommendations, including, but not limited to:

H1,
cont.

1. Rent Stabilization and An Inclusionary Housing Ordinance.

The community is requesting additional housing resources, including rent control and an inclusionary housing ordinance, in high-income and resource-constrained areas. As we mentioned, the City was unable to meet its 5th cycle RHNA, this policy can ensure that the City meets its 6th cycle RHNA requirements. Residents have consistently advocated for housing in high opportunity areas and this will allow an increase in housing choice and affordability, particularly for low income communities of color. This is a critical policy that will create meaningful benefits and allow the City to affirmatively further fair housing, just as this policy intended.

H2

2. Codifying the Eviction Protection Program into Municipal Code.

Moreover, the City's response regarding the Eviction Protection Program (EPP) is notable, as the City adheres to this policy. However, the City must conduct marketing and outreach for this program, as community residents are unaware that it exists. For EPP to be successful, it must expand and fund a full Rights to Counsel Program, which will ensure housing stability and prevent displacements.

H3

3. Adequate engagement with the unhoused community and organizations that work directly with the unhoused community.

Finally, to follow up on comment response 8, the City must follow up and work with agencies that directly engage with the community, not just those with which the City is accustomed to working. Thus, working with organizations outside of the City HART team eliminates the possibility of further criminalizing community members, which undermines the efforts by homeless service providers, and impedes residents from permanent housing solutions. We also need stronger systems of accountability based on centering and bringing to table the voices of those affected to ensure that services and needs are met. This holistic approach will ensure that we bridge the gaps in communities that are often overlooked.

H4

Once again, this is a critical opportunity for the City to implement meaningful policies and programs that will foster the equitable development of affordable housing throughout the City and ensure that vulnerable residents are protected from displacement. We appreciate the consideration of our comments. If you have any questions and would like to further discuss our

H5

[1] Chetty, R., Hendren, N., & Katz, L. (2016). The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment, 104(4), 855–902. <https://doi.org/10.3386/w21156>

2210 San Joaquin Street, Fresno, CA 93721

Telephone: (559) 369-279

City of Fresno 2025 Prohousing Application Response to Public Comments

comments please contact Pedro Martinez, Policy Advocate, at pmartinez@leadershipcounsel.org. We look forward to collaborating with the City to advance access to safe, affordable housing for all City of Fresno residents.

Sincerely,

Pedro Martinez,
Housing and Land Use Policy Advocate
Leadership Counsel for Justice and Accountability

Marisa Moraza
Political Director
Power California

Shar Thompson
Central Valley Regional Coordinator
Tenants Together

Dez Martinez
CEO
We Are Not Invisible

H5,
cont.

[1] Chetty, R., Hendren, N., & Katz, L. (2016). The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment, 104(4), 855–902. <https://doi.org/10.3386/w21156>

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Response H1: These are introductory comments and do not need a response.

Response H2: We acknowledge this comment and appreciate support towards the City meeting its RHNA obligation in a manner that Affirmatively Furthers Fair Housing. As mentioned in the City's previous response, both rent control and inclusionary housing were considered, but ultimately not recommended for inclusion in the City's 6th Cycle Housing Element. Therefore, staff believes this comment is not appropriate for inclusion into the Prohousing Application.

Response H3: In addition to the implementation of Program 34 of the Housing Element, the City has promoted the Eviction Protection Program to residents. The City Attorney's Office has created a webpage (<https://www.fresno.gov/cityattorney/eviction-protection-program/>) with informational materials, including FAQs and flyers in multiple languages. Earlier this year, the City Attorney's Office held a workshop before City Council to share the progress of the program:

https://fresno.granicus.com/player/clip/1795?meta_id=540281. As implementation is underway for Program 34 and as consideration for expansion of EPP occurs through the budget process, the City believes that this comment is not appropriate for inclusion into the Prohousing Application.

Response H4: These comments are appreciated and staff would like to expand upon its previous response under Response E8 to note that the Fresno Continuum of Care membership includes more than 60 non-governmental organizations that work closely with community members, including those most affected by homelessness. Some of the member organizations include Gracebound, Inc., Change for Good, Big Sandy Rancheria, Westside Family Preservation Services, Westcare, and Vocational Rehabilitation Specialists, Inc., among others. Because the City primarily works with organizations beyond its HART team, staff believes this comment is not appropriate for inclusion into the Prohousing Application.

Response H5: These are closing remarks and do not need a response.

City of Fresno 2025 Prohousing Application
Response to Public Comments

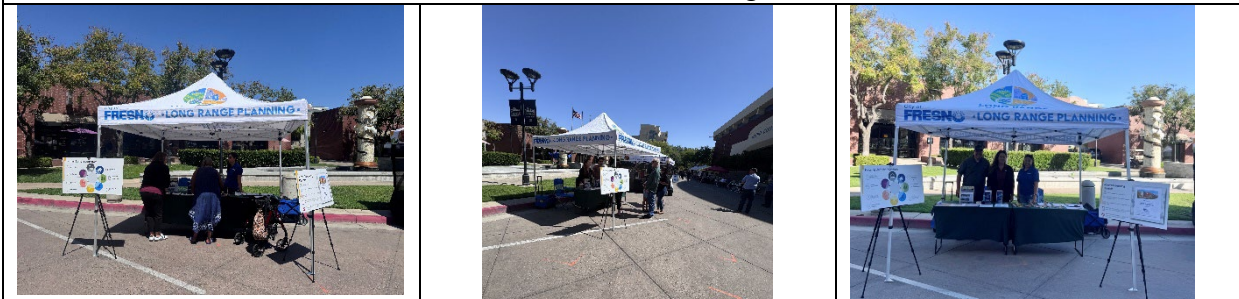
3. Outreach Materials

3.1 Tabling Events and Community Meeting

Art Hop – August 7, 2025



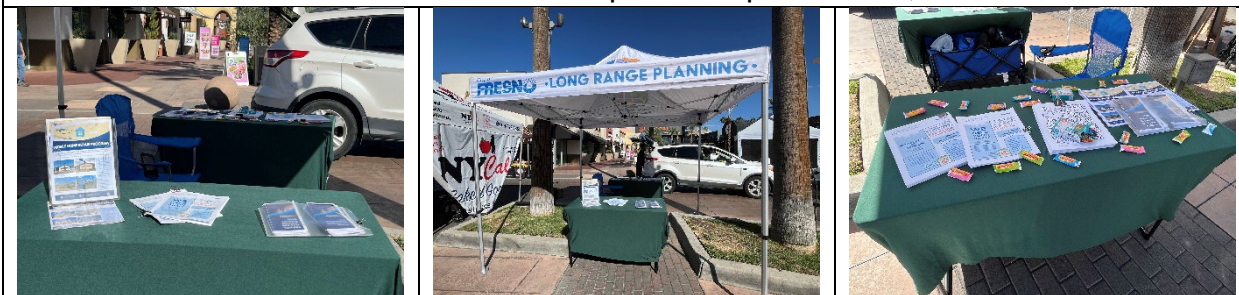
Farmer's Market on Kern – August 13, 2025



Community Meeting – August 20, 2025



Farmer's Market at Riverpark – September 10, 2025



City of Fresno 2025 Prohousing Application Response to Public Comments

3.2 Social Media Posts

August 13, 2025	August 15, 2025
City of Fresno, California's post City of Fresno, California August 13 The City of Fresno needs your help! The City is applying to be re-designated as a "Prohousing City" by the State of California. Help us create a strong application! Cities that reduce barriers to housing can earn the prohousing designation and receive prioritized access to State grants for affordable housing. Join us for an upcoming meeting to learn more about the program and visit www.fresno.gov/prohousing to review and provide feedback on the City's Draft Application. Draft Application Public Review Period Tuesday, August 12, 2025 – September 12, 2025 Visit www.fresno.gov/prohousing for more information Online Prohousing Informational Webinar Friday, August 15, 2025 2:30pm – 3:30pm (PT) Join the meeting on Zoom, https://fresno.zoomgov.com/j/1614154372 (Spanish, Hmong, and Punjabi interpretation provided) In-Person Housing Element Update & Prohousing Presentation Wednesday, August 20, 2025 5:00pm – 7:00pm (PT) Ted C. Wills Community Center 770 N San Pablo Ave, Fresno, CA 93728 (Spanish, Hmong, and Punjabi interpretation provided) CITY OF FRESNO PROHOUSING WE NEED YOUR HELP! The City of Fresno is applying to be re-designated as a "Prohousing City" by the State of California. Help us create a strong application! Cities that reduce barriers to housing can earn the prohousing designation and receive prioritized access to State grants for affordable housing. YOU'RE INVITED! Join our Informational Webinar August 15th, 2025 2:30 pm (Pacific Time) Learn more about the program, then review and comment on the draft application. The Meeting will be held via Zoom. Please click the link below to join the webinar or scan the QR Code: https://fresno.zoomgov.com/j/1614154372 www.fresno.gov/prohousing (595) 423-8003	City of Fresno, California's post City of Fresno, California August 15 Join the Planning & Development Department for a Community Meeting on Wednesday, August 20, 2025, from 5:00pm to 6:30pm at the Ted C. Wills Community Center. We will highlight two key housing initiatives: the City's Prohousing Designation application and the 2025 Housing Element mid-year update. For further details, please visit www.fresno.gov/housing. City of FRESNO PLANNING & DEVELOPMENT COMMUNITY MEETING PROHOUSING DESIGNATION APPLICATION & 2025 HOUSING ELEMENT MID-YEAR UPDATE The City of Fresno invites you to join us for a meeting highlighting two key housing initiatives. We will share our plans to apply for a "Prohousing Designation" from the California Department of Housing and Community Development (HCD), which recognizes communities committed to support housing production. We will also provide a six-month progress update on Fresno's Housing Element, our roadmap for building safe, affordable, and inclusive housing for all. Your input is valuable, and we welcome your feedback as we move these efforts forward. AUGUST 20, 2025 5:00 PM – 6:30 PM Ted C. Wills Community Center 770 N. San Pablo Ave., Fresno, CA 93728 www.fresno.gov/housing www.fresno.gov/prohousing

City of Fresno 2025 Prohousing Application Response to Public Comments

3.3 Flyers Advertising the Public Comment Period

