

## **Consolidated Plan Public Comment**

The City of Fresno received three (3) letters, five (5) verbal comments during the Consolidated Plan Public Hearing and two new (2) verbal comments during the continued hearing for a total of seven (7) verbal comments. These comments are grouped into categories and summarized below. The written letters and transcription of the verbal comments are attached as Attachment 3.

Requests to increase discussion on evaluation of past performance and changes to geographic targeting have been incorporated into the Final Draft of the Consolidated Plan (ConPlan) for City Council review and deliberation.

### **Past Performance & Oversight**

One of the primary concerns expressed with the ConPlan was the ability for the public to view past performance metrics and outcomes. The main tool to provide information to the public regarding past performance is the Consolidated Annual Performance Evaluation Report (CAPER). While the City's CAPER is available to the public on the City's website, the data and narrative does not provide sufficient detail to the reader.

In response to this concern, the Housing Division is committed to annually presenting the CAPER to the Housing and Community Development Commission (HCDC) during the month of September. Additionally, staff has developed a program monitoring and reporting tool that will be provided to HCDC quarterly to ensure that programs are progressing. Programs that are underperforming will be identified and solutions put in place during the course of a program year rather than after. Mid-year revisions will be made based upon performance toward set benchmarks and program goals.

The redline version of the ConPlan will be updated to provide a more detailed evaluation of past performance, measures that have been put in place to improve performance, and the quarterly reporting tool for HCDC in the Executive Summary section of the narrative.

### **Outreach**

Some of the comments requested more detail on the extent of the outreach – especially to the City's non-English speaking communities. The City conducted a complete outreach and participation effort during the month of March, 2015. During this time, the City's outreach contractor directly contacted 159 agencies via phone and email, conducted interviews with 20 agencies, and held four community meetings including one Saturday event. Forty-eight agencies were represented at the community meeting including the Fresno-Madera Continuum of Care, Stone Soup Fresno, and the Fresno Housing Authority. One hundred and eleven individuals attended the forums. Further, 417 Community Survey Responses were collected.

While there is no specific time frame in the Code of Federal Regulations, a 30-day public outreach period followed by a 30-day public comment period fulfills the outreach expectations of the program. The ConPlan process does require that the City list agencies in the document which include a broad section of agencies representing diverse demographic segments. The City may not list individual persons nor does the City ask respondents for race or ethnicity to ensure a fair process for all. Pages 21-28 of the ConPlan details which agencies attended the community forums.

All meetings were advertised and noticed in English and Spanish. Spanish translation was available at all of the meetings and additional translation services were available upon request as is the City's public participation policy and practice. A number of agencies representing the Southeast Asian community were contacted. Because we do not keep records of race or ethnicity, it is unknown as to the number of persons who participated from this community.

The City exceeded its outreach requirements through its partnership with BNCP who took the initiative to send information home to local school children in several target neighborhoods. There is no requirement that the City provide this type of outreach. However, staff, in discussion with HCDC will evaluate the language distribution in Fresno and identify additional languages for outreach including but not limited to the top three languages spoken in Fresno.

### **Geographic Priorities**

Several comments expressed a desire to modify or remove the Targeted Area Map which has been used since 2010 to give higher priority to project applications in the neighborhoods surrounding the Downtown core. Staff agrees there are eligible and needed projects city-wide. The redline version of the ConPlan removes this map and the priority preference from HOME funded projects.

### **Funding Priorities**

A number of comments received indicated the need for programs to increase the accessibility of affordable rental housing. Goal 1, Safe and Affordable Housing, seeks to increase development, preservation, and rehabilitation of affordable housing for low-income and special needs households. This includes a Goal Outcome Indicator of 150 rehabilitated or new affordable rental units. In addition, the City supports nonprofit and other governmental entities in competitive program applications such as the Low Income Housing Tax Credit Program (LIHTC).

Comments were received both for and against the use of CDBG funds for revitalization activities such as Code Enforcement and Crime Prevention. Both activities have been funded for a number of years to enhance and improve neighborhoods by removing blight. The aforementioned activities are funded by both the General Fund and federal funds where the proportion of General Funds has increased over the past two funding cycles.

The remaining comments also discussed the following funding priorities:

- Housing rehabilitation for homeowners with grants not loans. The Draft 2015-16 Annual Action Plan proposes to fund 20 new single family rehabs with HOME funds using guidelines which will be revised to provide grants to extremely low households and deferred forgivable loans to very low income households.
- Rehabilitation of affordable rental housing. New and/or rehabilitation project NOFA is scheduled to be released in 2016 for leveraging of other affordable housing funding.
- Strong City Code Enforcement. The proposed 2015-16 General Fund budget proposes funding for a new Blight Team along with a general purpose Code Enforcement division intended to address code violations and enforcement of city, state, and federal laws. The Annual Action Plan includes proposed funding for two Neighborhood Revitalization Teams which will assess neighborhoods in collaboration with residents to identify code violations and solutions.
- Public facilities increased services to children and seniors. PARCS programming for senior meals and youth after school programs is proposed for funding. The location of these programs has been identified but additional locations can be evaluated.
- Infrastructure and Neighborhood Improvements. Funding is proposed for both specific projects (e.g., Almy & Roy reconstruction) as well as new projects using a combination of General Fund and CDBG funds which will be identified by the Council Districts.
- Public Services for youth, veterans, and seniors rather than crime prevention. The Annual Action Plan proposes the majority of public service funds (77% of public service funds) to fund both senior meals and after school youth programs. Additionally some graffiti removal activities, considered a crime prevention program, (12%) and neighborhood revitalization activities (11%) are proposed.
- Funding for the point-in-time survey and NOFA are both eligible expenditures under the Administrative category of the Emergency Solutions Grant program.
- Job Creation in Low Income Neighborhoods. The Annual Action Plan does not directly fund employment training; however, the Section 3 Plan will require the city to contract with companies which are Section 3 certified including those who hire persons residing in low income neighborhoods. The City will identify occasions to offer job recruitment opportunities for projects funded with federal programs.
- ESG. The Annual Action Plan reflects a backlog of prior year funding which will be issued in a NOFA this month. The City has met with the FMCoC Executive Committee regarding a

change in the City's funding procedure to allow for an open-ended process. Funding is allocated based upon consultation with the FMCoC which has a Housing First priority for moving individuals to housing rapidly. There is also a concentrated effort to provide ongoing outreach to engage chronic homeless and veterans and an opportunity to utilize this outreach in collaboration with the City's Homeless Task Force to provide on-call or embedded case management services for drug and alcohol addictions, mental health issues, or similar situations.

- HOME funds are currently in compliance with all timeliness requirements and the new dashboard tool will assist in active monitoring of project timelines and progress. The redline version of the ConPlan and the Annual Action Plan remove the awarding of geographic priority points for major HOME project applications. The leveraging of funding is critically important to increasing affordable housing. Staff will assess how it can include a broader unit mix in application review and evaluation.

- HOPWA. This is a new program for the City and we will rely heavily on the experience of the State and the local service providers to ensure continuity for current clients of the programming. The State will continue to provide services until it has expended its current allocation and then the City will begin providing services. This will provide a 60-90 day window for the City to enter into service contracts with appropriate providers.