



April 13, 2021

RE: City of Fresno Annual Action Plan 2021-2022

Attn: Planning and Development Department, Housing and Community Development Division:

The Disability Advisory Commission (DAC) advises the City in matters pertaining to individuals with a wide range of disabilities. The comments below were prepared by the DAC Housing Subcommittee on behalf of the Commission as a whole.

Overall, the comprehensive five year goals and the Annual Action steps as identified are supported by this Commission. We would like to take this opportunity, however, to highlight some critical elements in the proposed plans and provide recommendations for adjusting funding to better serve the whole community.

When considering the HUD Community Planning & Development priorities to provide decent, affordable housing, create suitable living environments, and expand economic opportunities, it is critical that the City look at these elements from a disability access lens. Key areas that make or break housing efforts for people with disabilities include ensuring that there are not only affordable housing options, but also available and accessible housing options. In our Central Valley, availability of accessible units is the key crisis for people with disabilities looking for affordable housing. It is recommended that when funding projects for construction of affordable housing units, that the City require more than the mandated minimum number of accessible units to meet the needs of people with disabilities.

The CDBG funding as allocated in this plan is critical for disability access in the community. The federally mandated and council approved ADA Transition Plan contains priorities for barrier removals at our parks, community centers, and the public right-of-way. CDBG funding for these barrier removal projects are a critical component of fulfilling Title II accessibility mandates, an aspect that should be included within the text of the document. Economic opportunities opened up for people with disabilities when funding is allocated for improving infrastructure. When a person with a disability can use the sidewalk and access public transportation, they now have the ability and opportunity to get to work. When the City invests in barrier removal projects at community centers, they open up possibilities for participation in life-long recreation, from early childhood intervention programs to meal support and recreation services for older adults. The DAC is supportive of the CDBG allocations as indicated.

The DAC is supportive of HOPWA goals as stated. While strides have been made in the last few decades in the overall acceptance of persons with AIDS/HIV, there are still many needs related to increasing the housing opportunities for these individuals with disabilities.

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The ESG objectives as stated show the awareness of the intersectional issues faced by people with disabilities experiencing homelessness. DAC recommends continuing partnership with disability subject matter experts for greater understanding of the diverse needs of this community and for culturally competent services.

The DAC encourages a larger allocation of funding for Fair Housing Advocacy Services and greater emphasis on providing legal help for existing tenants to assist with requesting reasonable accommodations. Many currently housed community members with disabilities have tenant-landlord struggles that put them at risk of experiencing homelessness, including but not limited to unfair rental cost increases, refusal to provide reasonable accommodations, and unlawful eviction threats. While federal mandates state that tenants must be provided reasonable accommodations, having those needs actually met is a common struggle that people with disabilities face. Many are left with little recourse and fear retaliation or displacement from their home if they push to have their legal rights to be met in rental housing. The plan objective of 75 persons served is not enough to meet the actual needs of this community, based on the observations from local disability advocates.

The DAC recommends that the City better define the metrics and outcomes for success for funded programs with the objectives of "persons assisted." Understanding that finding housing and actually attaining housing are two different outcomes, it would be of value to report the extent to which these persons were assisted.

The DAC is supportive of housing rehabilitation programs that are provided through the HOME fund. These kinds of programs assist people with disabilities to age in place with dignity.

Individuals with disabilities represent 14 percent of our community. Fresno outstrips both state and national averages for the percentage of population identified as a portion of an overall community (11% and 13%, respectively). As the population continues to age, these numbers are quite likely to increase. The investment in accessible and affordable public housing is essential to the independence of people with disabilities and the older adult population of Fresno.

Any questions on these comments can be addressed to DAC Secretary, Shannon M. Mulhall, Americans with Disabilities Act Coordinator at 559-621-8716 or [Shannon.Mulhall@fresno.gov](mailto:Shannon.Mulhall@fresno.gov). We would happily discuss any and all of the above issues.

Sincerely,

Frances Reyes Acosta, Chair  
City of Fresno Disability Advisory Commission

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