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**From:** Leslie Martinez <lmartinez@leadershipcounsel.org>  
**Sent:** Tuesday, April 28, 2020 9:01 AM  
**To:** BOSComments  
**Subject:** Agenda Item 5 - Comments

The County's adoption of Consolidated Plan today is premature for two primary reasons: 1) The County has failed to update its Analysis of Impediments to Fair Housing since 2010 and 2) The County has failed to conduct an adequate community engagement process to inform the development of the Consolidated Plan before our today.

To our knowledge, Fresno County did not update the Analysis of Impediment prior to presenting this consolidated plan update, and has not conducted an AI update since 2010. The County's housing elemtn states that it conducted an "internal review" in 2015 - an internal review without public process clearly does not meet the standards set forth by HUD. We have heard nothing of an update to the AI since that time, although HUD guidelines suggest an update every 3-5 years and the Fresno County Housing Element policy requires an update every 5 years. A primary purpose of the AI is to inform the consolidated plan, including its funding allocation strategies. HUD expects entitlement jurisdictions "to develop an AI that involves and addresses the concerns of the entire community." FHPG, 3:3. According to HUD's Fair Housing Planning Guide, "The AI structure should provide for effective, ongoing relationships with *all* elements of the community with clear and continuous exchange of concerns, ideas, analysis, and evaluation of results." FHPG, 2:12. Without an AI the Consolidated plan is incomplete and outdated on the needs in Fresno County. We ask the board to address staff on the timeline for the AI and why the consolidation plan moved forward without it.

With respect to the Consolidated Plan before you today, based on the information available to us, the County has not met the standards set by HUD for its preparation. HUD clearly requires for, "The "[chief executive] should ensure, through focus groups, an advisory commission, town meetings, or other effective means, that regular contact and working arrangements are created and maintained" with fair housing organizations, other governments in the metropolitan area or region, advocacy groups, housing providers, banks and other financial institutions, and the general public. 2:13-14. Leadership Counsel nor other community based organizations, legal aid groups, and community residents which we contacted, are aware of the county taking any steps to engage community and stakeholders as identified by HUD guidelines.

We look forward to working with the county and Staff to better community engagement and address the issues in the consolidation plan.

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