



APPENDIX 1C: CITY OF FIREBAUGH

Fresno Multi-Jurisdictional 2023-2031 Housing Element

*Public Review Draft
September 2023*



A Regional Plan for Addressing Housing Needs

Fresno County • Coalinga • Firebaugh • Fowler • Fresno City • Huron • Kerman
Kingsburg • Mendota • Orange Cove • Parlier • Reedley • San Joaquin • Sanger • Selma



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SECTION 1C-0: SUMMARY OF NEEDS AND CONDITIONS

Housing Needs Assessment

As part of the Housing Element, the City prepared a detailed Regional Housing Needs Assessment (Section 2) analyzing Firebaugh's demographics. The Regional Housing Needs Assessment identified a number of trends that informed the goals and policies of the updated Housing Element, including:

- The city's average annual population growth was 2.1 percent between 2000 and 2022, just above the countywide average growth rate of 2.0 percent.
- Approximately one-third of Firebaugh residents (33.4 percent) were school-aged students (ages 5 to 17 years), and the median age of city residents is 29.9 years.
- The majority of Firebaugh residents, 92.5 percent, identified as Hispanic or Latino of any race.
- The average number of persons per household in the city was higher than the countywide average (3.8 in Firebaugh compared to 3.1 countywide).
- The median household income in Firebaugh in 2020 was \$36,411, among the lowest in the county. The countywide median income in the same year was \$57,109.
- Firebaugh had an over-representation of very low-income families compared to other jurisdictions in the county, with 21.4 percent of families having incomes in this category.
- Just over 40 percent (40.7 percent) of employed residents of the city worked in agriculture, forestry, fishing and hunting, or mining in 2020. In 2022, 14.5 percent of city residents were unemployed.
- More than half of households in the city (53.3 percent) were renters as of 2020.
- Firebaugh had the second-highest vacancy rate in the county in 2022 at 8.1 percent across all housing units, regardless of tenure. This was a slight decrease from its 2010 vacancy rate of 8.4 percent.
- Compared to other jurisdictions in the county, housing stock in the city was relatively new. Only 45.2 percent of housing units were built more than 30 years ago, and only 13.8 percent were built more than 50 years ago. Countywide, rates of housing stock in similar age ranges were 64.5 and 32.9 percent, respectively.
- The city had a slightly lower rate of households overpaying for housing in 2018, with 36.8 percent of all households overpaying for housing compared to 37.8 percent across the county. The number of lower-income households overpaying for housing was also lower in the city (62.9 percent compared to 70.6 percent countywide).
- The city had a higher rate of household overcrowding and severe overcrowding than the county as a whole among both renters and homeowners.

- Firebaugh had a higher rate of large households, those with five or more members, than the county as a whole (30.8 percent of households in the city compared to 18.1 percent countywide).
- Between 2021 and 2022, the average sale price of a home in the city decreased by 1.6 percent compared to an increase of 15.4 percent in the county as a whole during the same period.
- In 2020, the percentage of the city’s population that was aged 65 or older was lower than the county as a whole (9.8 percent of the city compared to 12.0 percent of the county). Just over half (52.6 percent) of the city’s senior households were homeowner households.
- Just over one-third of seniors in the city (34.2 percent) had a disability.
- The percentage of Firebaugh households with single female heads of household was higher than the countywide rate (10.7 percent in Firebaugh compared to 7.3 percent in the county), though it was not among the cities with the highest rate of this household type. Additionally, over half (51.6 percent) of female-headed households in the City were living under the poverty level.
- Firebaugh had a lower rate of residents with disabilities than the county as a whole (6.6 percent compared to 12.9 percent across the county). Ambulatory difficulties were the most commonly reported disability.
- Estimates from the 2022 Point-in-Time count suggest that 3 persons in Firebaugh may have been experiencing homelessness at that time.
- Of the 58,762 year-round and seasonal farmworkers across the county in 2017, 37,819 (64.3 percent) worked 150 days or more each year, and 35.7 percent worked less than 150 days per year. An estimated 40.7 percent of Firebaugh’s employed population worked in agriculture, higher than the countywide rate (8.8 percent).
- Extremely low-income residents (those earning 30 percent or less of median income) make up 14.0 percent of the total households in Firebaugh, compared to 13.3 percent in the county as a whole. Of extremely low-income households in the city, 87.7 percent were renter households, and 12.3 percent were owner occupied households. In the County as a whole, 80.0 percent of extremely low-income households are renters and 20.0 percent are homeowners.

Housing Constraints

While the City has made extensive efforts to encourage development of affordable and market-rate housing, there are some governmental and nongovernmental constraints that can make housing development more difficult. Governmental constraints are typically rules that apply to all development and are intended to meet other community interests.

- There are no growth management policies that would limit the City’s abilities to meet its housing needs.
- Zoning Code updates will be required to bring the code in line with State law, including changes to standards for emergency shelters and changes to the zones that permit employee housing, low barrier navigation centers, transitional and supportive housing, residential care facilities, and ADUs.
- The City’s Affordable Housing Density Bonus will need to be updated to be consistent with State law.

- Current standards for off-site improvements are not considered a barrier to development.
- City building and permitting fees and regional exactions that offset impacts on existing infrastructure like parks and roadways, but add to the cost of housing development, are not considered a barrier to development.
- The City’s project approval process timeline is not a constraint for processing multiple-dwelling unit projects and housing affordable to low-income residents.
- The City’s Design Review and approval process is relatively rapid, and processing timelines are not considered a constraint to development.
- The City’s Reasonable Accommodation procedure does not present a barrier to development or to the provision of housing for persons with disabilities.
- The City will need to establish SB 330 and SB 35 application processes as well as objective design standards.

Nongovernmental constraints include challenges such as water access, the desire to preserve land for agricultural use, availability of financing, and the high cost of land in the city and across the region. A number of the goals and policies in the Housing Element are aimed at eliminating or lessening constraints to development of housing.

Housing Resources

A major component of the Housing Element is an analysis of sites that are available for the development of housing to meet the City’s RHNA. The Housing Element identifies sites in Firebaugh where zoning is in place to allow for housing development, including higher-density housing (20+ units per acre) that is suitable for affordable housing development.

- Firebaugh has identified sufficient housing sites to meet its lower, moderate- and above-moderate housing allocation.
- The City coordinates with the County to provide several programs designed to help residents find affordable housing. These include the Housing Choice Voucher (HCV or Section 8) program and a City program to publicize information related to housing discrimination in multiple languages.
- The City will encourage the development of ADUs by educating the public about this housing type and providing informational materials to all discretionary land use applicants. The City also offers preapproved building plans for ADU’s free of charge.

SECTION 1C-1: ACTION PLAN

Regional Collaboration

Program 1: Regional Collaboration on Housing Opportunities

The Multijurisdictional Housing Element provides an opportunity for countywide housing issues and needs to be more effectively addressed at the regional level rather than just at the local level, and the 15 participating jurisdictions are committed to continuing the regional collaboration in the implementation of the Housing Element. By working together, the jurisdictions can share best practices, explore opportunities for further collaboration, and make the best use of limited resources. The following efforts will be made to further regional collaboration:

- The City will continue to participate in the countywide Housing Element Technical Committee to collaborate on housing program implementation and regional issues, including disadvantaged unincorporated communities (Senate Bill [SB] 244), infrastructure challenges, farmworker housing, homelessness, and fair housing.
- The countywide Housing Element Technical Committee will meet at least biannually to evaluate successes in implementation of programs and to identify gaps and additional needs.
- The County of Fresno Public Works and Planning Department, with assistance from the Fresno Council of Governments (FCOG), will take the lead in coordinating biannual committee meetings.
- The Housing Element Technical Committee will meet annually with the California Department of Housing and Community Development (HCD) to discuss funding opportunities and challenges in implementation of programs and seek technical assistance from HCD and other State agencies.
- The Housing Element Technical Committee will advocate on behalf of the Fresno region for more grant funding for affordable housing and infrastructure improvements.
- The City will continue to seek partnerships with other jurisdictions in the region and other agencies (such as the Housing Authority), housing developers, community stakeholders, and agricultural employers/employees to explore viable options for increasing the availability of farmworker housing in suitable locations in the region.
- The City will develop a directory of services and resources for lower-income households available in the region, and review and update it annually. The directory will be available on City/County websites and at City/County offices.

Financing:	General Fund
Time Frame:	Continue to meet with the Housing Element Technical Committee twice per year; meet with HCD annually. Develop a directory of services and resources by December 2025, update annually as needed.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Policy 1.3, Policy 1.4, Policy 2.1, Policy 4.2

Program 2: Review Annexation Standards in Memorandum of Understanding

All jurisdictions in Fresno County are subject to the City/County Memorandum of Understanding (MOU), which establishes procedures for annexation of land to cities. The City/County MOU encourages urban development to take place within cities and unincorporated communities where urban services and facilities are available or planned to be made available to preserve agricultural land. The MOU standards for annexation require that a minimum of 25 percent of annexation areas have an approved tentative subdivision map or site plan. While cities can take certain steps to “prezone” land in advance of annexation, the annexation of the land into city limits depends on private developers requesting an annexation. In cities that are mostly built out within their current city limits, the MOU may limit the cities’ ability to accommodate future housing needs.

The County of Fresno and cities within the county shall work together at least once during the planning period to review and revise, as deemed appropriate by all parties, the standards for annexation contained in the City/County MOU.

Financing:	General Fund
Time Frame:	Meet with the County by December 2026 to review the MOU standards, and update within a year if changes are needed.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 1.3, Policy 1.4

Program 3: Homeless/Unhoused Needs

The City will cooperate with neighboring cities, the County, and other agencies in the development of programs aimed at providing homeless shelters and related services. During this coordination, the City will monitor the demographic composition of the unhoused population to identify needs for targeted resources and determine what efforts to take, such as providing education on financial assistance and programs available. The City will also support local homeless service providers, agencies, and other community organizations to pursue funding from available sources for homeless services.

Financing:	General Fund
Time Frame:	Ongoing coordination
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	Assist with program development and funding identification that will assist at least five homeless persons.
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 4.6

Adequate Sites

Program 4: Provision of Adequate Sites

The City of Firebaugh will provide for a variety of housing types and ensure that adequate sites are available to meet its Regional Housing Needs Allocation (RHNA) of 443 units. As part of this Housing Element update, the City has developed a parcel-specific inventory of sites suitable for future residential development. The suitability of these sites has been determined based on the development standards in place and their ability to facilitate the development of housing to meet the needs of the City’s current and future residents, pursuant to State laws. The City will:

- Maintain and annually update the inventory of residential land resources for internal purposes.
- Monitor the availability of sites appropriate for lower-income housing in keeping with state “no net loss” provisions (Government Code Section 65863), if development projects are approved at densities lower than anticipated in the sites inventory, and, if necessary, rezone sufficient sites to accommodate the RHNA within 180 days, ensuring that there is sufficient higher-density residential land available in areas throughout the city to deconcentrate poverty.
- Monitor and report residential development through the HCD annual report process.
- Actively participate in the development of the next RHNA Plan to ensure that the allocations are reflective of the regional and local land use goals and policies.
- Promote the development of affordable housing units on “in-fill” residential lots, some of which may have originally contained dilapidated homes that have been demolished. Continue to maintain a map for interested parties showing available infill sites for housing projects.
- Review maximum densities in the General Plan and Zoning Code and update as necessary to ensure consistency.

Financing:	General Fund
Time Frame:	Annually monitor as projects are processed.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 1.3, Policy 1.4, Policy 1.5, Policy 1.6, Policy 1.7, Policy 1.8, Policy 1.9

Program 5: Water and Wastewater Service

The development viability of the vacant sites in the inventory is directly linked to the availability and capacity of public facilities and services. As the water and wastewater provider, the City will adopt a written policy with specific objective standards for meeting the priority requirement for proposed developments that include housing units affordable to lower-income households, consistent with the provisions of California Government Code Section 65589.7. Additionally, a review of each of Firebaugh’s utility master plans should be conducted over the next five years. These master plan reviews should provide a five-year capital improvement program for each infrastructure system and a mechanism for financing these improvements consistent with Assembly Bill (AB) 1600.

Financing:	General Fund, Community Development Block Grant (CDBG)
Time Frame:	Adopt a policy by January 2025
Implementation Responsibility:	Public Works Department
Relevant Policies:	Policy 1.7

Program 6: Use of Sites in Previous Cycles

Pursuant to Government Code Section 65583.2(c), any non-vacant sites identified in the prior 5th Housing Element Cycle or vacant sites identified in two or more consecutive planning periods, shall be provided by-right development when at least 20 percent of the units in the proposed development are affordable to lower-income households.

Financing:	General Fund
Time Frame:	Within six months of adoption of the Housing Element.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Policy 1.1, Policy 1.2

Program 7: Encourage Mixed-Use Projects and Residential Uses in Commercial Zones

The City shall incentivize development of residential units in mixed-use projects and residential units in commercial zones by providing incentives, including, but not limited to:

- Priority project processing
- Deferral of development impact or permit fees, where possible
- Flexibility in development standards, such as parking, setbacks, and landscaping requirements
- Density and intensity bonuses
- Support for infrastructure upgrades
- Assist developers with securing additional financing.

Financing:	General Fund
Time Frame:	Annually reach out to developers to inform them of the available incentives and obtain feedback by January 2024 on the provided incentives, review annually and amend as needed.
Implementation Responsibility:	City of Firebaugh
Quantitative Objectives:	10 extremely low-income units, 20 very low-income units, and 30 low-income units to improve access to high-resource areas for lower-income households and reduce displacement risk resulting from overpayment through increased housing mobility opportunities.
Relevant Policies:	Policy 1.6

Affordable Housing Development and Preservation

Program 8: HOME Funding

Firebaugh will encourage and work with qualified housing entities to submit an application for funds under the HOME Program on behalf of the City. The City could in turn assist first-time homebuyers by deferring or reducing development impact fees. This program provides financial assistance to low- to moderate- income families for the purchase of newly constructed homes or existing homes. Other groups that could be assisted with rental housing include Extremely Low Income and disabled residents. The City Planner and City Manager will work with a qualified housing entity to identify appropriate building sites.

Financing:	HOME Funds
Time Frame:	Ongoing. Annually apply for funding as Notices of Funding Availability (NOFAs) are released.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	Provide financial assistance to 10 lower-income homebuyers over the next 8 years.
Relevant Policies:	Policy 2.5

Program 9: Community Development Block Grant Funding

Firebaugh will seek to annually apply for CDBG funds for rehabilitation of housing in Firebaugh. The City will aim to process five housing rehabilitations per year under this funding.

Financing:	HOME Funds
Time Frame:	Ongoing. Annually apply for funding as NOFAs are released.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	Provide financial assistance to 5 lower-income households needing home rehabilitation each year over the next 8 years.
Relevant Policies:	Policy 2.5

Program 10: Affordable Housing Incentives

The City continues to have needs for affordable housing for lower-income households, especially for seniors, persons with disabilities (including persons with developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households. The City will continue to work with housing developers to expand affordable housing opportunities by doing the following:

- Continue to seek partnerships and meet at least every other year with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing, with an emphasis on housing opportunities for very low- and extremely low-income households, as well as special-needs populations, such as seniors, persons with disabilities (including developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households. Meet more frequently if development rates increase.
- Work with public or private sponsors to identify candidate sites for new construction of housing for special needs and take all actions necessary to expedite processing of such projects.
- Pursue partnerships with the Central Valley Regional Center to identify funding opportunities and promote housing for persons with disabilities.
- Continue to offer fee reductions and deferral of development impact fee payments to facilitate affordable housing development and special-needs projects, particularly those on infill sites.
- Continue to promote the State density bonus and provide streamlined processing to facilitate affordable housing development and provide for additional flexibility for affordable housing and special-needs housing through the minor deviation process. The City will promote this program by publicizing the incentives on the City’s website and by conducting pre-application consultation with developers regarding available incentives. Examples of flexible development standards include reduced parking requirements; reduced requirements for curb, gutter, and sidewalk construction; common trenching for utilities; and reduced water and wastewater connection fees.
- Provide incentives to builders to provide housing with multiple bedrooms affordable to lower- and moderate-income households, aiming for construction of at least 20 units that meet these sizes, to meet the needs of female-headed, single-parent, and large-family households of all income levels (possible incentives will include reduced setbacks, reduced parking requirements, and technical assistance with applications for funding).
- Continue to streamline the environmental review process for housing developments to the extent possible, using available State categorical exemptions and federal categorical exclusions, when applicable.
- Monitor HCD’s website annually for NOFA and, where appropriate, prepare or support applications for funding for affordable housing for lower-income households (including extremely low-income households), such as seniors, disabled (including persons with developmental disabilities), the homeless, and those at risk of homelessness.

- Facilitate the approval process for land divisions, lot line adjustments, and/or specific plans or master plans resulting in parcel sizes that enable affordable housing development and process fee deferrals related to the subdivision for projects affordable to lower-income households.
- Encourage rental assistance for extra low-, very low-, and low- income households through programs provided by the Fresno County Housing Authority.

Financing:	HOME, CDBG, Low-Income Housing Tax Credit (LIHTC), Multifamily Housing Revenue Bond, and other funding sources, as available.
Time Frame:	Ongoing, as projects are processed by the City. Annually apply for funding and engage with Central Valley Regional Center at least every 2 years.
Implementation Responsibility:	City of Firebaugh, Fresno County Housing Authority
Quantified Objective:	Expand the City’s affordable housing inventory by 148 units over the next 8 years, 51 extremely low-income, 51 very low-income, and 46 low-income units, at least 15 of which include accessibility modifications to facilitate housing mobility for lower-income households and special-needs groups.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 2.2, Policy 2.3, Policy 2.4, Policy 2.5, Policy 2.7, Policy 4.3, Policy 4.4, Policy 5.2

Program 11: Planned Development Zone

The City of Firebaugh will continue to encourage private developers who are proposing residential development to seek a P-D (Planned Development) zone district. These districts allow for greater flexibility in residential design and better use of land. These opportunities allow the developer to potentially provide a more affordable housing product. The City will prepare an informational brochure that explains the standards and procedures for this zone.

Financing:	General Funds
Time Frame:	Ongoing.
Implementation Responsibility:	City of Firebaugh
Quantified Objective	Expand the City’s affordable housing inventory by 30 units over the next 8 years; 5 extremely low-income, 10 very low-income, and 15 low-income units.
Relevant Policies:	Policy 2.1

Program 12: Support Funding for Farmworker Housing

The farming industry is the foundation of the County’s economic base. According to the United States Department of Agriculture (USDA) 2017 Census of Agriculture, about 37,819 workers were employed in farm labor throughout the county, indicating a significant need to provide housing for farmworkers and their families, particularly during peak harvest seasons.

The City will seek to identify a development partner for a farmworker housing project to develop affordable housing for farmworkers. The City will support the project by expediting approval and consideration of deferral or reduction of impact fees will be given. Granting of a density bonus (under the City’s density bonus ordinance) could also help improve the feasibility of this type of development.

The City will annually monitor the status of farmworker housing as part of their annual report to HCD on Housing Element progress and evaluate if City efforts are effective in facilitating the provision of farmworker housing. If appropriate, the City will make necessary changes to enhance opportunities and incentives for farmworker housing development.

Financing:	General Fund
Time Frame:	Meet with farmworker housing developers and advocates on a biannual basis to discuss their needs and offer assistance in the form of letters of recommendation for grant applications, assistance with site identification and grant opportunities, and discuss incentives for constructing farmworker housing.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	10 lower-income units set aside for farmworkers and their families to reduce displacement risk for this population.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 2.2, Policy 2.4, Policy 2.5, Policy 4.2, Policy 4.3

Program 13: Extremely Low-Income Households

AB 2634 requires the quantification and analysis of existing and projected housing needs of extremely low-income households. To further support the development of units affordable to extremely low-income households, such as supportive and multifamily units, the City will continue to seek and pursue State and federal funds to offer a variety of incentives or concessions, such as:

- Identify a development partner such as Habitat for Humanity and/or Self Help to develop housing projects for lower-income families. The City may consider deferring or reducing processing or impact fees for qualified affordable housing projects.

- Provide financial support annually, as available, to organizations that provide counseling, information, education, support, housing services/referrals, and/or legal advice to extremely low-income households, to mitigate risk of displacement and support housing stability for extremely low-income households, persons with disabilities, farmworkers, and persons experiencing homelessness.
- Expand regulatory incentives for the development of units affordable to extremely low-income households and housing for special-needs groups, including persons with disabilities (including developmental disabilities), and individuals and families in need of emergency/transitional housing.

Financing:	General Fund, CDBG, HOME
Time Frame:	Ongoing; as projects are processed by the Planning Division. By December 2024, conduct outreach to potential development partners to understand funding needs, and review and prioritize local funding at least twice in the planning period, and support expediting applications on an ongoing basis.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	148 lower-income units, including 51 units for extremely low-income households to prevent displacement and provide housing mobility opportunities.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 4.2, Policy 4.6

Program 14: Preservation of At-Risk Housing Units

Preserving the existing affordable housing stock is a cost-effective approach to providing affordable housing in Firebaugh. The City must guard against the loss of housing units available to lower-income households. As of September 2022, there are no affordable units that are considered at risk of conversion to market rate in the next 10 years. For complexes at risk of converting to market rate, the City shall:

- Contact property owners of units at risk of converting to market-rate housing within one year of affordability expiration to discuss the City’s desire to preserve complexes as affordable housing.
- Coordinate with owners of expiring subsidies to ensure the required notices to tenants are sent out at 3 years, 12 months, and 6 months.
- Reach out to agencies interested in purchasing and/or managing at-risk units.
- Work with tenants to provide education regarding tenant rights and conversion procedures pursuant to California law.

Financing:	General Fund, LIHTC, Multifamily Housing Revenue Bond, and other funding sources as available.
Time Frame:	Annually monitor units at risk of converting; coordinate noticing as required per California law.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Policy 3.6

Program 15: Encourage and Facilitate Accessory Units

An accessory dwelling unit (ADU), sometimes called a “granny flat,” is an additional self-contained living unit either attached to or detached from the primary residential unit on a single lot. It has cooking, eating, sleeping, and full sanitation facilities. ADUs can be an important source of affordable housing given that they typically are smaller and have no associated land costs. The City will encourage the construction of ADUs, particularly in predominantly single-family neighborhoods with higher median incomes to reduce concentrations of lower-income households through the following actions, which are aimed at providing an increased supply of affordable units throughout the city, thereby increasing access to resources and facilitating housing mobility opportunities for lower-income households:

- Continue to implement the public education program advertising the opportunity for ADUs by updating informational handouts and brochures about ADUs that are available on the City’s website and at the public counter annually, or as needed to reflect changes in State law.
- Continue to provide preapproved ADU plans (three different floor plans available) free of charge.
- Provide informational materials on ADU opportunities to all discretionary land use applicants.
- At least annually, publish informational materials pertaining to ADUs through a combination of media, including the City’s social media accounts and direct mailing.
- By December 2024, identify incentives for construction of ADUs with new development, which may include differing collection times for impact fees for the square footage associated with the ADU.

Financing:	General Fund
Time Frame:	Update ADU materials annually, or as needed to reflect changes in State law, and identify incentives for construction by December 2024.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	8 ADUs, including 4 for lower-income households, 2 for moderate-income households, and 2 for above moderate-income households to improve housing mobility opportunities and reduce displacement risk.
Relevant Policies:	Policy 1.3, Policy 2.1, Policy 2.6

Program 16: Replacement Units

To reduce displacement risk and in accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.

This requirement applies to:

- Non-vacant sites;
- Vacant sites with previous residential uses that have been vacated or demolished.

Financing:	General Fund
Time Frame:	Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Policy 3.3, Policy 3.6

Program 17: Housing for a Variety of Needs

The City will encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes. This could include duplexes, townhomes, apartment buildings, and condominiums in neighborhoods and new subdivisions and will identify innovative and alternative housing options that provide greater flexibility and affordability in the housing stock while promoting mixed-income development. This may include consideration for further reduction in regulatory barriers for community land trusts, tiny houses, microhomes, cottage homes, small-lot subdivisions, and other alternative housing types, as well as exploration of a variety of densities and housing types in all zoning districts.

The City will use the findings of this program to target development of a variety of housing types in areas of predominantly single-family development and of concentrated overpayment to reduce displacement risk, promote inclusion, and support integration of housing types based on income.

Financing:	General Fund
Time Frame:	Identify innovative and alternative housing options to help further housing production by December 2025; amend the Zoning Ordinance as needed.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	10 lower-income units, 10 moderate-income units, and 5 above moderate-income units to reduce displacement risk for all residents and facilities in income-integrated neighborhoods.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 4.4

Program 18: Environmental Hazard Mitigation

The City will investigate the availability of additional funds and programs to mitigate risks related to flooding, dam inundation, and landslides, such as funds to elevate houses above 100-year flood level, particularly for low-income households. The City will apply for funds as funding opportunities become available.

Financing:	Community Development Block Grants, CDBG Program, Technical Assistance Grants, OES Flood Mitigation Funds.
Time Frame:	Ongoing.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Policy 1.1, Policy 3.1

Removal of Governmental Constraints

Program 19: Marketing the City

To improve its economy, the City should consider hiring a marketing firm to promote Firebaugh and improve its economic diversification, to create new and better-paying jobs and housing opportunities.

Financing:	General Funds
Time Frame:	Ongoing.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Land Use Element, Issue 12, Goal I (2)

Program 20: Zoning Code Amendments

The City will amend the Municipal Code to address the following development standards and barriers to special-needs housing opportunities:

- **Density Bonus:** Adopt a Density Bonus provision in 2023 to comply with California’s density bonus law (California Government Code Section 65915, as revised) and promote the use of density bonuses for lower-income units by providing information through a brochure in City buildings and on the City’s website.
- **Accessory Dwelling Units:** Amend the Zoning Code to be consistent with the latest State legislation related to ADUs, ensuring that ADUs are permitted in all residential or mixed-use zones, in accordance with California Government Code Section 65852.2.
- **Emergency Shelters:** Develop managerial standards for emergency shelters and allow sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii).

- **Low-Barrier Navigation Centers:** Permit low-barrier navigation centers, defined as low-barrier, temporary service-enriched shelters to help homeless individuals and families to quickly obtain permanent housing by-right in zones where mixed uses are allowed or in nonresidential zones that permit multifamily housing (Government Code Section 65662; AB 101).
- **Residential Care Facilities:** Allow residential care facilities for six or fewer persons, in accordance with Health and Safety Code Section 1568.0831, and allow residential care facilities, regardless of size, in all zones that permit residential uses of the same type, in accordance with the City’s definition of family.
- **Employee Housing:** Clarify the definition of employee housing in the zoning code to permit employee/farmworker housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses. (Health and Safety Code Sections 17021.5 and 17021.8).
- **Transitional and Supportive Housing:** Permit transitional housing and supportive housing as residential uses only subject to those restrictions that apply to other residential dwellings of the same type in the same zone, including removing limits on the number of residents served (Government Code Section 65583(a)(5)). Additionally, allow supportive housing in multifamily and mixed-use zones (Government Code Section 65651).
- **Definition of Family:** Revise the definition of family to state “one or more persons living together in a dwelling unit.”

Financing:	General Fund
Time Frame:	Complete remaining Zoning Ordinance amendments by December 2024. Annually review the effectiveness and appropriateness of the Zoning Ordinance and process any necessary amendments to remove or mitigate potential constraints to the development of housing.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Policy 1.1, Policy 2.7, Policy 5.2

Program 21: Reasonable Accommodations and Universal Design

The City currently provides information to individuals with disabilities regarding reasonable accommodation policies, practices, and procedures based on the guidelines from HCD. This information is currently available through postings and pamphlets at the public counter and on the City’s website.

The City will also implement State requirements (Sections 4450 to 4460 of the California Government Code and Title 24 of the California Code of Regulations) to include accessibility in housing and public facilities for persons with disabilities:

- Encourage housing developers to include mobility-impaired accessibility in their project designs and prioritize these types of projects to increase housing mobility opportunities for seniors and persons with disabilities.

- Review regulations and procedures for City-funded or operated housing programs to ensure that they do not exclude participation by persons with disabilities.
- Include accessibility considerations in the preparation of the City’s capital improvement plan and the allocation of funding for capital improvements in support of housing and residential neighborhoods for persons with physical or developmental disabilities.

Financing:	General Fund, SB 2 Grant Funding, LEAP Grant Funding
Time Frame:	Continue to make promotional materials for the Reasonable Accommodations process available at City Hall and on the City’s website and update to include information about universal design. Continue to update biannually, or as needed.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	Assist five residents with reasonable accommodation requests to reduce displacement risk and encourage three accessible units to improve housing mobility.
Relevant Policies:	Policy 4.1, Policy 4.5

Program 22: Lot Consolidation

To create additional opportunities for infill development and affordable housing, the City will help to facilitate lot consolidations to combine small lots identified as part of a larger site in the Housing Element into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. As developers and owners approach the City with interest in lot consolidation for the development of affordable housing, the City could defer certain fees, allow more height or additional stories, waive lot-merger fees for certain small contiguous lots, and provide concurrent/fast tracking of project application reviews to developers who provide affordable housing. By 2026, the City will review the effectiveness of this program and revise as appropriate. The City will also evaluate grant funding for parcel assemblage land banking when it is available.

Financing:	General Fund (legislative efforts); grant funding (implementation)
Timeframe:	Meet with developers and property owners starting in 2024 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months, and again each year after every annual meeting occurs. On an ongoing basis, support consolidation as applicable housing applications are received, pursue grant funding during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.
Implementation Responsibility:	City of Firebaugh
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 1.4, Policy 1.5, Policy 2.4
Quantified Objective:	Support at least one lot consolidation during the planning period to improve housing mobility, reduce displacement risk, and increase the supply of

	affordable housing in higher-opportunity areas. Approve more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.
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Program 23: Monitoring of Planning and Development Fees

The City charges various fees to review and process development applications. Such fees may add to the cost of housing development. The City will analyze housing-related development fees, particularly for multifamily housing, on an annual basis to ensure they do not unduly constrain development. As part of the analysis process, meet with multifamily developers at least once by December 2024 to request input regarding constraints associated with fees. Based on feedback received, reduce fees if found to be a constraint. Further, the City will offer deferred or reduced fees to facilitate affordable housing development, as appropriate.

Financing:	General Fund
Time Frame:	Meet with multifamily developers by December 2024 and revise fees, if necessary, by December 2025. Review fees annually.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	Facilitate construction of 100 multifamily units during the planning period, targeting missing-middle development in higher-resource areas and encouraging at least 50 of the units to be affordable to lower-income households.
Relevant Policies:	Policy 1.2, Policy 1.4

Program 24: Preliminary Applications (SB 330) and Streamlined Approval (SB 35)

The City will develop a preliminary application form and procedure or will adopt the preliminary application form developed by HCD, pursuant to SB 330. The City will also establish a written policy and/or procedure, and other guidance as appropriate, to specify the SB 35 streamlining approval process and standards for eligible projects under Government Code Section 65913.4. The applications will be available on the City’s website for developers interested in pursuing the streamlined process or vesting rights.

Financing:	General Fund
Time Frame:	Develop or adopt HCD’s SB 330 preliminary application form by December 2024. Develop an SB 35 streamlined approval process by June 2025 and implement as applications are received.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	Facilitate construction of 5 very low-income units and 5 low-income units to increase housing mobility opportunities, prioritizing new opportunities in higher-resource areas.
Relevant Policies:	Policy 1.4, Policy 2.3, Policy 2.4

Program 25: Objective Design Standards

The City will develop objective design guidelines and standards to provide clear and objective standards related to single-family, multifamily, and mixed-use residential developments.

Financing:	General Fund
Time Frame:	Adopt objective design standards by December 2025 and implement thereafter.
Implementation Responsibility:	Community Development Department
Quantified Objective:	25 units over the planning period; 15 of these units in higher-opportunity areas to promote access to resources and mobility for target households.
Relevant Policies:	Policy 1.8, Policy 2.7

Housing Quality**Program 26: Code Enforcement**

The Planning Department will continue to use code enforcement and abatement processes to bring substandard housing units and residential properties into compliance with City codes. The City will continue to apply for CDBG funding to facilitate rehabilitation projects. Targeted efforts to improve housing conditions in areas of need will facilitate place-based revitalization and assist in reducing displacement risk for residents by improving living conditions and enabling them to remain in their home and community.

Financing:	General Fund, CDBG
Time Frame:	Make informational materials on rehabilitation assistance programs available within 6 months of receiving CDBG funding, to be provided on an ongoing basis when violations are confirmed, conduct code enforcement as complaints are received.
Implementation Responsibility:	City Police Department
Quantified Objective:	Reduce displacement risk and encourage place-based revitalization by facilitating rehabilitation of 5 units by providing informational materials to owners in violation of City codes on available assistance programs and annually promote available assistance programs in areas of concentrated lower-income households.
Relevant Policies:	Policy 3.1, Policy 3.3

Housing Assistance

Program 27: Energy Conservation

The City will continue to promote energy conservation in housing development and rehabilitation:

- Establish reduced fees for solar projects and expedited review and approval for Firebaugh residents by December 2024.
- Continue to promote and support Pacific Gas and Electric Company programs that provide energy-efficiency rebates for qualifying energy-efficient upgrades by providing a link on the City website and making brochures available at City counters.
- Encourage developers to be innovative in designing energy-efficient homes and improving the energy efficiency for new construction.

Financing:	General Fund
Time Frame:	Make information easily available on the City’s website and at public facilities by June 2025.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	Assist 5 low-income residents annually in need of assistance with energy-efficiency improvements to reduce displacement risk due to housing costs.
Relevant Policies:	Policy 6.1, Policy 6.2, Policy 6.3

Program 28: Weatherization

Reinstate implementing weatherization programs for senior and low-income households. The rehabilitation of housing units using CDBG funds will include energy conservation improvements, including energy-efficient windows, wall insulation, weather stripping, etc.

Financing:	General Fund
Time Frame:	Make information easily available on the City’s website and at public facilities by June 2025.
Implementation Responsibility:	City of Firebaugh
Quantified Objective:	Assist five senior or low-income residents annually in need of assistance with energy-efficiency improvements to reduce displacement risk due to housing costs.
Relevant Policies:	Policy 2.5, Policy 3.2, Policy 4.1

Program 29: Housing Choice Vouchers

The Housing Choice Voucher (HCV) Program extends rental subsidies to extremely low- and very low-income households, including families, seniors, and the disabled. The program offers a voucher that pays the difference between the current fair-market rent (FMR) as established by the United States Department of Housing and Urban Development (HUD) and what a tenant can afford to pay (i.e., 30 percent of household income). The Fresno Housing Authority administers the HCV program in Fresno County.

- Provide a link to the Fresno Housing Authority’s HCV program webpage on the City’s website by February 2024.
- Meet with the Fresno Housing Authority by June 2024 to discuss the process of developing printed informational materials, with the goal of making materials available at public counters by June 2025.
- Work with the Housing Authority to disseminate information to landlords and property owners on incentives for participating in the HCV program throughout the city to promote housing opportunities for all residents.
- Refer interested households to the Fresno Housing Authority and encourage landlords to register their properties with the Housing Authority for accepting HCVs.

Financing:	HUD Section 8
Time Frame:	Provide information on the City’s website by February 2024. Meet with the Housing Authority by June 2024 and develop informational materials by June 2025. Target outreach to property owners and landlords at least annually.
Implementation Responsibility:	Fresno Housing Authority
Quantified Objective:	30 lower-income units in high-opportunity areas to promote access to resources and mobility for target households.
Relevant Policies:	Policy 2.2

Program 30: Housing Discrimination Monitoring and Referral

The Fresno Housing Authority publicizes all information related to housing opportunities, programs, fair-housing information and assistance in English, Spanish, Hmong, French, German, Chinese, Arabic, Dutch, Italian, Korean, Portuguese, and Russian. However, while all public notices and information on the Housing Authority website are translated to all of the previously mentioned languages, general circulation of information and secondary links, such as applications, are available only in English. The City will coordinate with the Housing Authority, FCOG, and other Fresno County jurisdictions to develop Spanish-language printed materials to improve accessibility to fair housing resources for residents. If additional languages become more prevalent in the county, materials will be translated into those languages as needed.

The City will also:

- Establish a procedure to refer residents with fair housing questions or issues to the Fair Housing Council of Central Valley (FHC-CC), California Rural Legal Aid (CLRA), and other fair-housing organizations.
- Provide fair housing information on the City’s website and in printed materials available in public buildings in both English and Spanish.
- Coordinate with local fair housing service providers to conduct biannual trainings for landlords and tenants on fair housing laws, rights, and responsibilities and ongoing access to legal counseling.

Financing:	General Fund, grant funding
Time Frame:	Either individually or as part of the Countywide Housing Element Technical Committee (Program 1), meet annually with FC-CC to discuss fair housing issues and opportunities for education. Assist the Housing Authority to translate fair housing materials and resources into Spanish by December 2024. Make fair housing information available on the City’s website and in public buildings by June 2025. Coordinate with fair housing providers to conduct biannual trainings for landlords and property owners.
Implementation Responsibility:	Community Development Division, Fresno Housing Authority
Quantified Objective:	Reduce displacement risk for 20 individuals or families resulting from language barriers and 10 from discrimination by landlords or property owners.
Relevant Policies:	Policy 5.1

Program 31: Improve Access to Resources

The City shall take the following actions to improve access to resources and opportunities citywide, but with a particular emphasis on neighborhoods with a concentration of lower-income residents who often face additional barriers in accessing resources:

- Work with Fresno County Rural Transit Agency (FCRTA) and other jurisdictions in the county to develop a fact sheet, or similar informational materials, of FCRTA programs to be posted on the City’s website, social media, and in public buildings by January 2026, and advertised annually in the City’s newsletter to help connect seniors and other residents to services in the city and throughout the county.
- Prioritize projects that facilitate place-based revitalization through the City’s Capital Improvement Plan, such as projects that improve public infrastructure in deteriorating or underserved areas.
- Post information about flood-related resources on the City’s website and provide public notices in utility bills or other direct methods to neighborhoods at risk of flooding.
- Ensure program availability and funding announcements are made available in Spanish and translation is available at public meetings.

- Facilitate place-based revitalization and promote healthy environments for new housing by evaluating transitional buffers between residential and agricultural uses and highways and working with developers as projects are proposed to mitigate impacts associated with emissions from agricultural industries and traffic and facilitate access to healthy outdoor spaces.
- Meet with school district representatives by June 2025 to analyze whether housing security poses a barrier. Work with the school district to assist in securing grant funding for teacher recruitment and retention bonuses, classroom materials, and other incentives for teachers to facilitate positive learning environments citywide.

Financing:	General Fund
Time Frame:	Develop and post FCRTA materials by January 2026. Meet with school district representatives by June 2025.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Improve access to resources and reduce displacement risk resulting from a variety of factors for at least 10 residents.
Relevant Policies:	Policy 3.1, Policy 3.5, Policy 5.1, Policy 5.2

Quantified Objectives

Quantified objectives estimate the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the planning period based on optimal implementation of each program. The quantified objectives do not set a ceiling on development; rather, they set a target goal for the jurisdiction to achieve based on needs, resources, and constraints. Each quantified objective is detailed by income level, as shown in **Table 1C-1**.

TABLE 1C-1 QUANTIFIED OBJECTIVE SUMMARY

Program	Extremely Low	Very Low	Low	Moderate	Above Moderate
RHNA	51	51	46	66	229
New Construction					
Program 7	10	20	30		
Program 10	51	51	46		
Program 11	10	20	30		
Program 12			10		
Program 13	51	51	46		
Program 15			4	2	2
Program 17			10	10	5
Program 21			5		
Program 23			50	50	
Program 24		5	5		
Program 25	5	10	10		
Rehabilitation					
Program 9			5		
Program 26			5		
Program 28			5		
Conservation					
Program 8			10		

Source: City of Firebaugh, February 2023

1. In some cases, quantified objectives overlap and therefore identify multiple strategies to achieve the RHNA.
2. Moderate- and above moderate-income unit capacity is anticipated to be met by market development trends.

SECTION 1C-2: SITES INVENTORY

California law (Government Code Section 65583 (a)(3)) requires that the Housing Element contain an inventory of land suitable for residential development, including vacant sites that can be developed within the planning period and nonvacant (i.e., underutilized) sites having potential for redevelopment. State law also requires an analysis of the relationship of zoning and public facilities and services to these sites.

Regional Housing Needs Allocation

The Regional Housing Needs Allocation (RHNA) is the State of California–required process that seeks to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. The process is split into the following three steps.

1. **Regional Determination:** The California Department of Housing and Community Development (HCD) provides each region with a Regional Determination of housing need, which includes a total number of units split into four income categories (very low, low, moderate, and above moderate). The City of Firebaugh is in the region covered by the Fresno Council of Governments (FCOG). HCD allocated FCOG a Regional Determination of 58,298 units for the 6th cycle Housing Element (2023-2031). This is the total number of units that the cities and counties in the FCOG region must collectively plan to accommodate.
2. **RHNA Methodology:** Councils of Governments (COGs), including FCOG, are responsible for developing a RHNA methodology for allocating the Regional Determination to each city and county. This methodology must further specific State objectives, including, but not limited to, promoting infill, equity, and environmental protection; ensuring jobs-housing balance; and affirmatively furthering fair housing.
3. **Housing Element Updates:** Each city and county must then adopt a housing element that demonstrates how the jurisdiction can accommodate its assigned RHNA through its zoning. HCD reviews each jurisdiction’s housing element for compliance with State law.

The City of Firebaugh’s share of the regional housing need was determined using a methodology prepared by FCOG as part of the Regional Housing Needs Plan, adopted in October 2022. In accordance with FCOG’s Regional Housing Needs Plan, the City must plan to accommodate a total of 443 housing units between July 30, 2023, and December 31, 2031. **Table 1C-2** shows the City’s RHNA by income category. Of the 443 total units, the City must plan to accommodate 102 units for very low-income households, 46 units for low-income households, 66 units for moderate-income households, and 229 units for above moderate-income households.

TABLE 1C-2 REGIONAL HOUSING NEEDS ALLOCATION, 2023-2031

Income Category	Allocation	Percentage
Very Low*	102	23%
Low	46	10%
Moderate	66	15%
Above Moderate	229	52%
Total	443	100%

Source: FCOG, 2022.

*It is assumed that 50 percent of the very low-income units are allocated to address extremely low-income need.

Availability of Land

State Housing Element law emphasizes the importance of adequate land for housing and requires that each Housing Element “...identify adequate sites ... to facilitate and encourage the development of a variety of housing types for all income levels...” (California Government Code Section 65583(c)(1)). To allow for an adequate supply of new housing, land must be zoned at a variety of densities to ensure that development is feasible for a wide range of income levels. The identified land must also have access to appropriate services and infrastructure, such as water, wastewater, and roads.

To demonstrate the City’s capacity to potentially meet its RHNA, an adequate sites inventory was conducted. The inventory must identify adequate sites that will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of housing types for households of all income levels.

Sites Identified in Previous Housing Element

Pursuant to California Government Code Section 65583.2(c), a nonvacant site identified in the previous planning period and a vacant site identified in two or more previous consecutive planning periods cannot be used to accommodate the lower-income RHNA unless the site is subject to an action in the Housing Element that requires rezoning within three years of the beginning of the planning period that will allow residential use by right for housing developments with at least 20 percent of the units affordable to lower-income households. There are 25 parcels in the inventory that were identified in two previous cycles. Two of these (sites 1 and 7) will be used to meet the lower-income RHNA, seven parcels in six sites (within sites 6, 9, 11, 17, 18, and 23) will be used to meet the moderate-income RHNA, and 16 parcels within 14 sites (within sites 1 through 5, 8, 10, 12, 16, 20, 26, 27, 28, and 31) to meet the above moderate-income RHNA. A total of 17 parcels in sites 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12, and 16 were counted under the City’s list of multifamily sites in the 4th and 5th cycles, which they identified as having sufficient density to accommodate housing for lower-income households. Therefore, the City has included **Program 6**, which commits the City to allowing residential use by right on sites consistent with Government Code Section 65583.2(c) for housing developments in which at least 20 percent of the units are affordable to lower-income households. These sites are identified with an asterisk in **Table 1C-4**.

Zoning to Meet the RHNA

The analysis of the relationship of suitable sites to zoning provides a means for determining the realistic number of dwelling units that could actually be constructed on those sites in the current planning period. The Firebaugh Housing Element sites inventory uses the following assumptions:

- **Relation of density to income categories.** The following assumptions were used to determine the income categories according to the allowed densities for each site:
 - **Lower-Income (LI) Sites.** Sites at least 0.5 acres in size that allow at least 20 units per acre were inventoried as feasible for lower-income (low- and very low-income) residential development. This includes sites zoned R-3, which allows up to 29 units per acre, along with commercial zones C-1, C-2, and C-3, which all allow residential uses subject to R-3 standards. Sites 7, 15, 39, 40, and 53 fall into this category. Sites 1 and 54 include units in both lower-income and above moderate-income categories. Site 37 includes units in both lower-income and moderate-income categories. Site 57 includes units in all three affordability categories.
 - **Moderate-Income (M) Sites.** Sites of at least 0.2 acres that are zoned R-2 allow for up to 13 dwelling units per net acre. These areas were inventoried as feasible for moderate-income residential development. Typical dwelling units include small and medium-sized apartments and other attached units. Sites that are larger than 0.2 acres but smaller than 0.5 acres in size and zoned for R-3, C-1, C-2, or C-3 were deemed too small to be inventoried as lower income and were instead inventoried as moderate income. Sites 6, 9, 11, 17 through 19, 23, 25, 29, 30, 33, 34, 36, and 41 fall into this category. Site 37 includes units in both lower-income and moderate-income categories. Site 57 includes units in all three affordability categories.
 - **Above Moderate-Income (AMI) Sites.** Sites with zoning that allows only single-family homes at lower densities were inventoried as above moderate-income units. This includes sites zoned R-1, R-1-4.5, and R-1-5. Sites that are smaller than 0.2 acres in size and zoned for R-3, C-1, C-2, or C-3 were deemed too small to be inventoried as lower-income and were instead inventoried as above moderate-income. Additionally, sites smaller than 0.2 acres zoned R-2 were deemed too small to be inventoried as moderate-income and were instead inventoried as above moderate-income except where part of a larger site. Sites 2 through 5, 8, 10, 12 through 14, 16, 20 through 22, 24, 26 through 28, 31, 32, 35, 38, 42 through 52, 55, and 56 fall into this category. Sites 1 and 54 include units in both lower-income and above moderate-income categories. Site 57 includes units in all three affordability categories.

Realistic Development Potential

In determining the realistic capacity for the City’s inventory of sites, the City considered land use controls and site improvements and assumed an 80 percent adjustment on residential sites and a 50 percent adjustment on commercial sites to reflect developable acreage due to on-site improvements, including sidewalks, utility easements, and infrastructure improvements (roadway access, water, sewer, and stormwater). All sites are served by or planned to be served by infrastructure, with no constraints identified that would reduce capacity beyond the 80 percent adjustment in residential areas or 50 percent in commercial areas that allow residential. To further determine an appropriate realistic capacity assumption, the City considered and evaluated the implementation of its current multifamily development standards (e.g., setbacks, building height, parking, density requirements, land use controls, water and wastewater access, and open space requirements), as well as project examples to determine approximate density and unit capacity so as to not over-project unit potential.

Recent multifamily project examples at market- and moderate-income rates show an average of 83 percent, as shown in **Table 1C-3**. Additionally, an affordable multifamily housing project recently developed in Orange Cove at 87 percent of the maximum density for the City’s R-3 zone. Because Orange Cove is similarly remote, this project may be a useful example of the current development market for larger multifamily projects. Additionally, a Fresno Housing Authority project that underwent site plan review in 2020 is planned to redevelop from 34 to 68 units, a 100 percent increase in density. As shown in **Table 1C-4**, while Firebaugh has not had mixed-use projects develop recently, projects in nearby Kingsburg and Reedley have all developed at more than 100 percent of the maximum permitted density. With these recent developments in mind, the City decided to assume an 80 percent realistic capacity on all residential sites in **Table 1C-4** and a 50 percent capacity on commercial sites that allow residential uses.

TABLE 1C-3 REALISTIC CAPACITY PROJECT EXAMPLES

Project Name	Affordability	Acres	Project Status	General Plan / Zoning	Total Project Units	Max. Allowable Units	Realistic Capacity
City of Firebaugh							
Del Rio Place	Market-Rate	3.8	Under Construction – 2023	R-3	56	110	51%
2020 S. Landucci	Moderate-Income	0.56	Constructed – 2019	Residential Medium/R-2	8	7	114%
Average							83%
City of Orange Cove							
Amaya Village	Low- and Very Low-Income	4.53	Constructed – 2021	R-3	80	98	87%
Average							87%

Source: City of Firebaugh, 2023.

TABLE 1C-4 MIXED-USE PROJECT EXAMPLES

Project Name	Affordability	Acres	Project Status	General Plan/Zoning	Total Project Units	Max. Allowable Units*	Realistic Capacity
City of Reedley							
Reedley I Mixed-Use	Lower Income	4.25	Approved 2022	LI/ML	80	63	127%
City of Kingsburg							
Stone Plaza Mixed Use Project	Market Rate	0.28	Under Construction 2023	CC/CC	10	6	145%
						Average	127%

Source: Cities of Reedley and Kingsburg, 2023.

*Density bonus units were not included in the project.

Table 1C-5 identifies vacant sites that are presently zoned for residential or mixed uses and suitable for residential development in Firebaugh. The locations of these sites are shown on **Figure 1C-1**. Based on permitted densities and the assumptions described previously, the sites identified in **Table 1C-5** can accommodate an estimated 885 units, including 444 lower-income units, 197 moderate-income units, and 244 above moderate-income units.

Much of the city is within a Federal Emergency Management Agency (FEMA) flood hazard area, so accordingly, many of the sites in the City's inventory are within a flood zone. The central area of the city is within a 1-percent annual chance flood area (FEMA category AH) and areas to the west and northwest of the city are within a moderate flood risk area (FEMA category X). The lower-risk category X flood zone includes all of the R-3 sites in the city and many sites in commercial zones where residential uses are permitted. All of the city's sites are within a dam inundation zone, as the majority of the city is covered by the inundation zone for Friant Dam. The Housing Element includes a program to seek funds to mitigate the potential impacts of unavoidable environmental hazards.

TABLE 1C-5 VACANT SITES

Site	Assessor's Parcel Number	Acres	General Plan Designation	Zoning	Maximum Density per Acre	Maximum Capacity	Total Realistic Capacity	Lower-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Environmental Hazards
1	007-120-09	2.95	Service Commercial	C-3	29	86	68	68			Dam Inundation Zone
1	007-120-13*	0.12	High Density Residential	R-3	29	3	3			3	Dam Inundation Zone
1	007-120-17*	0.12	High Density Residential	R-3	29	3	3			3	Dam Inundation Zone
1	007-120-18*	2.24	High Density Residential	R-3	29	65	52	52			Dam Inundation Zone
1	007-120-19*	0.12	High Density Residential	R-3	29	3	3			3	Dam Inundation Zone
2	007-110-64*	0.19	High Density Residential	R-3	29	6	4			4	Dam Inundation Zone
3	007-110-08*	0.15	High Density Residential	R-3	29	4	4			4	Dam Inundation Zone
4	007-110-12*	0.14	High Density Residential	R-3	29	4	3			3	Dam Inundation Zone
5	007-110-55*	0.14	High Density Residential	R-3	29	4	3			3	Dam Inundation Zone
6	007-110-66*	0.23	High Density Residential	R-3	29	7	5		5		Dam Inundation Zone
7	007-110-30*	0.55	High Density Residential	R-3	29	16	13	13			Dam Inundation Zone
8	007-110-25*	0.15	High Density Residential	R-3	29	4	3			3	Dam Inundation Zone
9	007-110-22*	0.38	High Density Residential	R-3	29	11	9		9		Dam Inundation Zone
9	007-110-40*	0.44	High Density Residential	R-3	29	13	10		10		Dam Inundation Zone
10	007-110-39*	0.18	High Density Residential	R-3	29	5	4			4	Dam Inundation Zone
11	007-110-37*	0.35	High Density Residential	R-3	29	10	8		8		Dam Inundation Zone
12	007-110-45*	0.17	High Density Residential	R-3	29	5	4			4	Dam Inundation Zone
13	007-141-2S	0.27	Medium Density Residential	R-1-5	8	2	2			2	Dam Inundation Zone
13	007-210-9S	0.21	Medium Density Residential	R-1-5	8	2	1			1	Dam Inundation Zone
14	007-250-1S	0.13	Medium Density Residential	R-1-4.25	10	1	1			1	Dam Inundation Zone
15	008-020-28	1.87	Service Commercial	C-3	29	54	27	27			Dam Inundation Zone
16	008-100-26*	0.44	Medium Density Residential	R-2	10	4	3			3	Dam Inundation Zone
17	008-041-06*	0.22	Service Commercial	C-3	29	6	3		3		Dam Inundation Zone
18	008-043-01*	0.42	Central Commercial	C-2	29	12	6		6		Dam Inundation Zone
19	008-730-3T	0.25	Central Commercial	C-2	29	7	4		4		Dam Inundation Zone
20	008-073-08*	0.17	Central Commercial	C-2	29	5	2			2	Dam Inundation Zone
21	008-073-09	0.08	Central Commercial	C-2	29	2	1			1	Dam Inundation Zone

SECTION 1C-2: SITES INVENTORY

Site	Assessor's Parcel Number	Acres	General Plan Designation	Zoning	Maximum Density per Acre	Maximum Capacity	Total Realistic Capacity	Lower-Income Capacity	Moderate -Income Capacity	Above Moderate -Income Capacity	Environmental Hazards
22	008-074-04	0.18	Central Commercial	C-2	29	5	3			3	Dam Inundation Zone
22	008-074-18	0.08	Central Commercial	C-2	29	2	1			1	Dam Inundation Zone
23	008-074-06*	0.25	Central Commercial	C-2	29	7	4			4	Dam Inundation Zone
24	008-074-09	0.13	Central Commercial	C-2	29	4	2			2	Dam Inundation Zone
25	008-741-0T	0.23	Service Commercial	C-3	29	7	3		3		Dam Inundation Zone
26	008-076-05*	0.17	Central Commercial	C-2	29	5	2			2	Dam Inundation Zone
27	008-076-16*	0.15	Service Commercial	C-3	29	4	2			2	Dam Inundation Zone
28	008-076-27*	0.17	Central Commercial	C-2	29	5	2			2	Dam Inundation Zone
29	008-132-10	0.30	Service Commercial	C-3	29	9	4		4		Dam Inundation Zone, 100-Year Flood Zone
30	008-403-5T	0.44	Service Commercial	C-3	29	13	6		6		Dam Inundation Zone
31	008-124-04*	0.33	Medium Density Residential	R-2	10	3	3			3	Dam Inundation Zone, 100-Year Flood Zone
32	008-134-12	0.14	Service Commercial	C-3	29	4	2			2	Dam Inundation Zone, 100-Year Flood Zone
33	008-160-34	0.23	Service Commercial	C-3	29	7	3		3		Dam Inundation Zone, 100-Year Flood Zone
34	008-160-02	0.21	Service Commercial	C-2	29	6	3		3		Dam Inundation Zone, 100-Year Flood Zone
35	008-170-33	0.14	Medium Density Residential	R-2	10	1	1		1		Dam Inundation Zone, 100-Year Flood Zone
36	008-170-22	0.63	Medium Density Residential	R-2	10	6	5		5		Dam Inundation Zone, 100-Year Flood Zone
36	008-170-25	0.07	Medium Density Residential	R-2	10	1	1			1	Dam Inundation Zone, 100-Year Flood Zone
37	007-070-80	0.94	Service Commercial	C-3	29	27	14	14			Dam Inundation Zone
37	007-070-81	0.45	Service Commercial	C-3	29	13	6		6		Dam Inundation Zone
38	007-070-38	0.18	Service Commercial	C-1	29	5	3			3	Dam Inundation Zone, 100-Year Flood Zone
39	007-070-40	0.54	Service Commercial	C-1	29	16	8	8			Dam Inundation Zone, 100-Year Flood Zone
40	007-070-54	0.72	Service Commercial	C-1	29	21	10	10			Dam Inundation Zone,

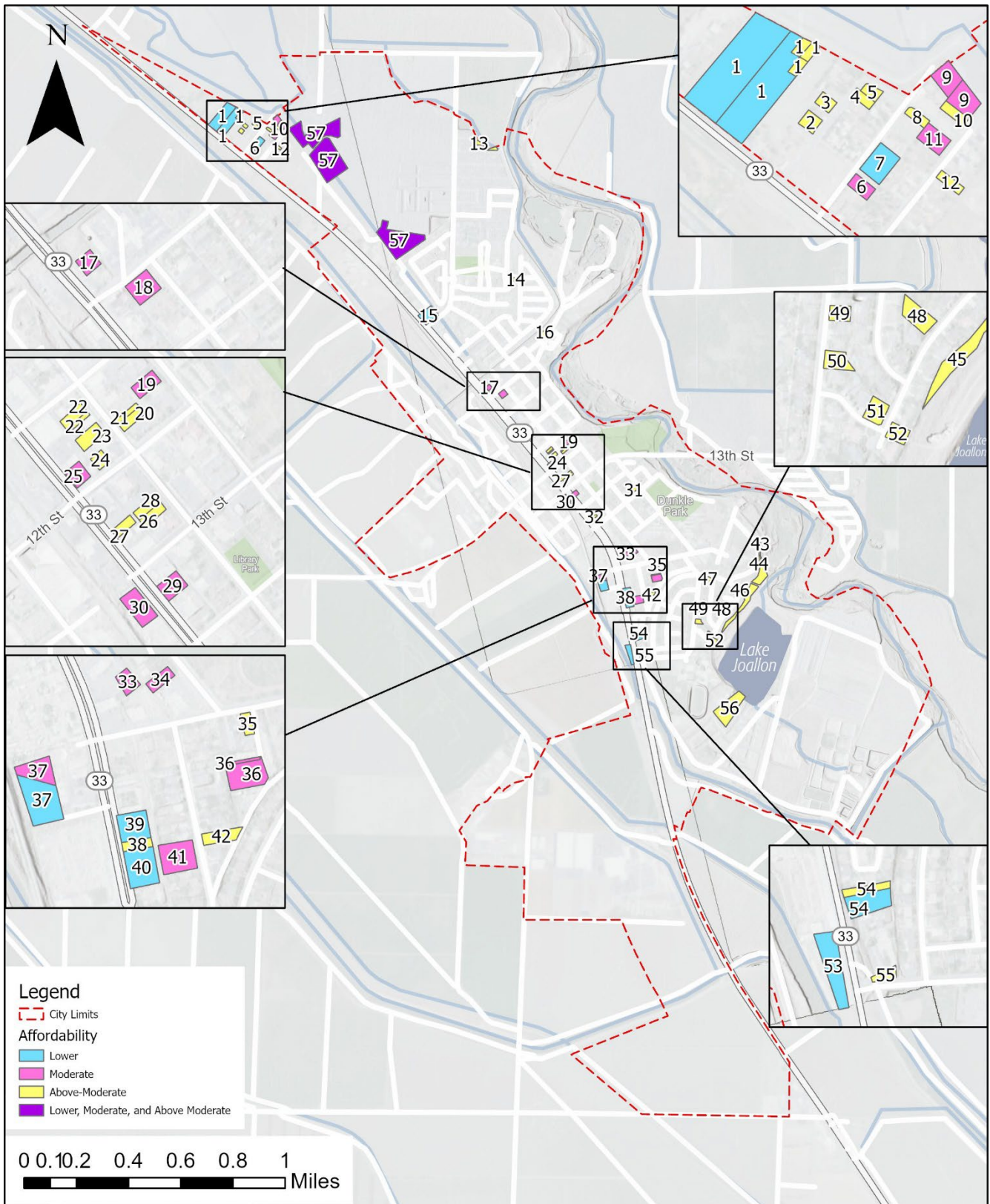
APPENDIX 1C: CITY OF FIREBAUGH

Site	Assessor's Parcel Number	Acres	General Plan Designation	Zoning	Maximum Density per Acre	Maximum Capacity	Total Realistic Capacity	Lower-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Environmental Hazards
											100-Year Flood Zone
41	007-070-75	0.66	Medium Density Residential	R-2	10	7	5		5		Dam Inundation Zone, 100-Year Flood Zone
42	007-151-14	0.28	Medium Density Residential	R-2	10	3	2			2	Dam Inundation Zone, 100-Year Flood Zone
43	008-200-06	0.19	Medium Density Residential	R-1	6	1	1			1	Dam Inundation Zone, 100-Year Flood Zone
44	008-200-31	0.23	Medium Density Residential	R-1	6	1	1			1	Dam Inundation Zone, 100-Year Flood Zone
45	007-903-9S	2.16	Medium Density Residential	R-1	6	13	10			10	Dam Inundation Zone, 100-Year Flood Zone
45	008-104-7S	1.56	Medium Density Residential	R-1	6	9	8			8	Dam Inundation Zone, 100-Year Flood Zone
46	008-104-5S	0.30	Medium Density Residential	R-1	6	2	1			1	Dam Inundation Zone, 100-Year Flood Zone
47	008-100-7S	0.20	Medium Density Residential	R-1	6	1	1			1	Dam Inundation Zone, 100-Year Flood Zone
48	007-903-7S	0.41	Medium Density Residential	R-1	6	2	2			2	Dam Inundation Zone, 100-Year Flood Zone
49	007-550-9S	0.20	Medium Density Residential	R-1	6	1	1			1	Dam Inundation Zone, 100-Year Flood Zone
50	007-001-1S	0.28	Medium Density Residential	R-1	6	2	1			1	Dam Inundation Zone, 100-Year Flood Zone
51	007-001-5S	0.28	Medium Density Residential	R-1	6	2	1			1	Dam Inundation Zone, 100-Year Flood Zone
52	007-001-6S	0.21	Medium Density Residential	R-1	6	1	1			1	Dam Inundation Zone, 100-Year Flood Zone
53	007-330-02	0.80	Service Commercial	C-3	29	23	12	12			Dam Inundation Zone
54	007-330-03	0.22	Service Commercial	C-2	29	6	5			5	Dam Inundation Zone, 100-Year Flood Zone
54	007-330-04	0.57	Service Commercial	C-2	29	16	8	8			Dam Inundation Zone, 100-Year Flood Zone
55	007-301-1T	0.14	Service Commercial	C-2	29	4	2			2	Dam Inundation Zone, 100-Year Flood Zone

Site	Assessor's Parcel Number	Acres	General Plan Designation	Zoning	Maximum Density per Acre	Maximum Capacity	Total Realistic Capacity	Lower-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Environmental Hazards
56	007-028-ST	4.60	Medium Density Residential	R-1	6	28	22			22	Dam Inundation Zone, 100-Year Flood Zone, Susceptible to Landslides
57	007-610-22	7.00	High Density Residential	R-3	29	580	464	232	116	116	Dam Inundation Zone
57	007-610-17	7.50									Dam Inundation Zone,
57	007-610-15	5.5									Dam Inundation Zone
Lower-Income Total								444			
Moderate-Income Total									197		
Above Moderate-Income Total										244	

Source: City of Firebaugh, 2023 * These parcels were also included in the 4th and 5th Cycle Housing Element inventories.

FIGURE 1C-1 FIREBAUGH SITES INVENTORY



Accessory Dwelling Units

California Government Code Section 65583.1(a) states that a town, city, or county may identify sites for accessory dwelling units (ADU) based on the number of ADUs developed in the prior Housing Element planning period, whether the units are permitted by right, the need for ADUs in the community, the resources or incentives available for their development, and any other relevant factors. Based on recent changes in State law reducing the time to review and approve ADU applications, requiring ADUs that meet requirements to be allowed by right, eliminating discretionary review for most ADUs, and removing other restrictions on ADUs, it is anticipated that the production of ADUs will increase in the 6th cycle Housing Element planning period.

The City did not issue any permits for ADUs during the previous planning period. However, to promote ADUs, the City has included **Program 15** to comply with state law and make construction of ADUs feasible for more property owners. Based on these trends, the City anticipates that eight ADUs will be built by December 2031.

ADUs are seen as an appropriate housing type for a primary residence for low-income households. Because regional affordability analysis of ADUs was not available for Fresno County, the City relied on rental rates for one- and two-bedroom units as a proxy for ADU rental rates. According to 2016-2020 American Community Survey (ACS) 5-year estimates, the median gross rent for one-bedroom units in Firebaugh is \$519 per month, and for two-bedroom units it is \$681 per month. As shown in **Table 2-24, Fresno County Ability to Pay (2022)**, in **Chapter 2, Regional Housing Needs Assessment**, low-income households can afford between \$1,091 (one-person households) and \$1,558 (four-person households) in monthly housing costs without being cost burdened. Comparing rental rates with the affordability of low-income households demonstrates that ADUs are appropriate to credit toward the City's lower-income RHNA, based on the median price of one- and two-bedroom units in Firebaugh. However, the City has decided to take a conservative approach and assume that 50 percent of ADUs will be affordable to lower-income households, 25 percent affordable to moderate-income households, and 25 percent affordable to above moderate-income households.

RHNA Summary

Table 1C-6 compares the City's RHNA to its site inventory capacity. Accounting for the vacant site capacity and the projected ADUs, the City has a surplus capacity of 450 units. This means the City has land available to build 450 more units than assigned in the RHNA. Breaking this down by income category, the City has a surplus of 300 units in the lower-income (including extremely low-, very low-, and low-income) category, a 133-unit surplus in the moderate-income category, and a 17-unit surplus in the above moderate-income category.

TABLE 1C-6 SUMMARY OF RESIDENTIAL CAPACITY COMPARED TO THE 6TH CYCLE RHNA

Income Category	2023-2031 RHNA	Vacant Sites Capacity (Table 1C-4)	Projected ADUs ¹	Total Capacity	Unit Surplus ²
Very Low	102	444	4	448	300
Low	46				
Moderate	66	197	2	199	133
Above Moderate	229	244	2	246	17
Total	443	885	8	572	450

Source: City of Firebaugh, 2023.

¹ Assumes the development of one ADU per year, with half of units developed for lower-income households and the remainder divided between moderate- and above moderate-income households.

² Surplus capacity is calculated by subtracting the RHNA from the total of projected ADUs and capacity on vacant sites. .

Adequacy of Public Facilities

The City provides water service for residents. As of August 2021, the Water Division provides potable water to 1,642 active service connections. The City also sells water to the Las Deltas Mutual Water Company, which operates a public water system outside the Firebaugh sphere of influence (SOI). The City’s average domestic water demand is 2.4 million gallons per day (MGD), with an additional 2.3 MGD average daily water use for a local tomato processing facility. To meet the increased demand projected as a result of projected population growth, the City will need to make improvements to the existing water system. However, the City has identified funding sources to finance future capital improvements. The City’s water system capacity is expected to serve the RHNA of 443 additional units.

The City also controls and administers the sewer system in the city. The system includes approximately 31 miles of sewer pipelines and 10 pump stations. Maintenance of the City sewer system is financed primarily by fixed user fees, charges for services, and connection fees as well as State or federal grants when available. The City’s wastewater treatment plant (WWTP) has a license to treat municipal wastewater at a maximum daily flow of 1.5 MGD. As of January 2022, the wastewater treatment facility discharges a monthly average flow of up to 1.1 MGD. The system’s capacity is more than enough to accommodate the City’s RHNA of 443 units.

In accordance with the provisions of California Government Code Section 65589.7, the City will establish a procedure (**Program 5**) and continue to give priority for water and sewer service to qualified affordable housing projects.

SECTION 1C-3: LOCAL ASSESSMENT OF FAIR HOUSING

Introduction

Assembly Bill (AB) 686 requires that all housing elements due on or after January 1, 2021, contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015. Under California law, AFFH means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”¹

California Government Code Section 65583 (10)(A)(ii) requires local jurisdictions to analyze racially or ethnically concentrated areas of poverty (R/ECAP), disparities in access to opportunity, and disproportionate housing needs, including displacement risk. Although this is the Housing Element for the City of Firebaugh, Government Code Section 65583(c)(10) requires all local jurisdictions to address patterns locally and regionally to compare conditions at the local level to the rest of the region. To that end, a Multijurisdictional Housing Element was completed for the cities of Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, Selma, and the County of Fresno, including a regional AFH and each participating jurisdiction prepared a local AFH.

This section is organized by fair housing topics. For each topic, the regional assessment is first, followed by the local assessment. Strategies to address the identified issues are included throughout the section. Through discussions with housing service providers, fair housing advocates, and preparation of this AFH, the City of Firebaugh identified factors that contribute to fair housing issues. These contributing factors are included in **Table 1C-14, Factors Contributing to Fair Housing Issues**, with associated actions to meaningfully affirmatively further fair housing related to these factors. Additional programs to affirmatively further fair housing are included in **Section 1C-1, Action Plan**.

This section also includes an analysis of the Housing Element’s sites inventory as compared with fair housing factors. The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for housing elements to analyze the distribution of projected units by income category and access to high resource areas and other fair housing indicators compared to citywide patterns to understand how the projected locations of units will affirmatively further fair housing.

¹ California Department of Housing and Community Development, *Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements (April 2021 Update)*, April 27, 2021, preface page, https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

Outreach

Community Workshop

On August 18, 2022, the City of Firebaugh held an in-person Community Workshop to provide information on the Housing Element and solicit input from the community. The City notified the community of this meeting with flyers distributed in English and Spanish through the FCOG listserv of regional stakeholders and community based organizations (CBOs), contacted the Fresno County Authority to post and distribute flyers, and posted to Facebook event page with a link to English and Spanish versions of the Eventbrite registration page, which advertised that the meeting would provide Spanish language interpretation, refreshments, and activities for children.

However, despite these extensive outreach efforts to inform community members of the event, there were only three participants. Discussion focused on the challenge of many lower- and moderate-income households in need of subsidized housing not qualifying due to income limits, as well as barriers to securing funding for affordable development as the city is considered risky by lenders. Although the City of Firebaugh does have a good working relationship with the Housing Authority, Habitat for Humanity, and Self-Help Housing, it was noted that they are having difficulty attracting developers without significant incentives. The City Manager noted that a predevelopment loan source for housing projects may be a useful program to pursue.

Participants identified a need for farmworker housing, like in other agriculturally based jurisdictions, to meet the needs of fieldworkers making minimum wage, stating that the drought has impacted financial resources for farmworkers and resulted in the loss of employment opportunities as landowners are selling off farmland that is no longer profitable. Participants also stated that many farmworkers in the area are undocumented and legal face barriers to housing, such as the legal residency requirement for USDA programs. The overall shortage of market rate affordable housing and strict eligibility requirements for affordable housing resources in the city has resulted in a disproportionate need for affordable housing for lower- and moderate-income households.

Following the workshop, the City posted English and Spanish copies of the workshop presentation on the Fresno County Multijurisdictional Housing Element Update website for residents to access at their convenience. Feedback received during this workshop was used to inform this AFH as well as associated programs, as identified in in **Table 1C-6, Contributing Factors to Fair Housing Issues**.

Study Session

A City Council study session was held virtually on September 12, 2022, to discuss the Housing Element Update and process. The study session was open to the public and held in person. Commentary was limited and no public comment related to fair housing was received at the meeting.

Fair Housing Issues

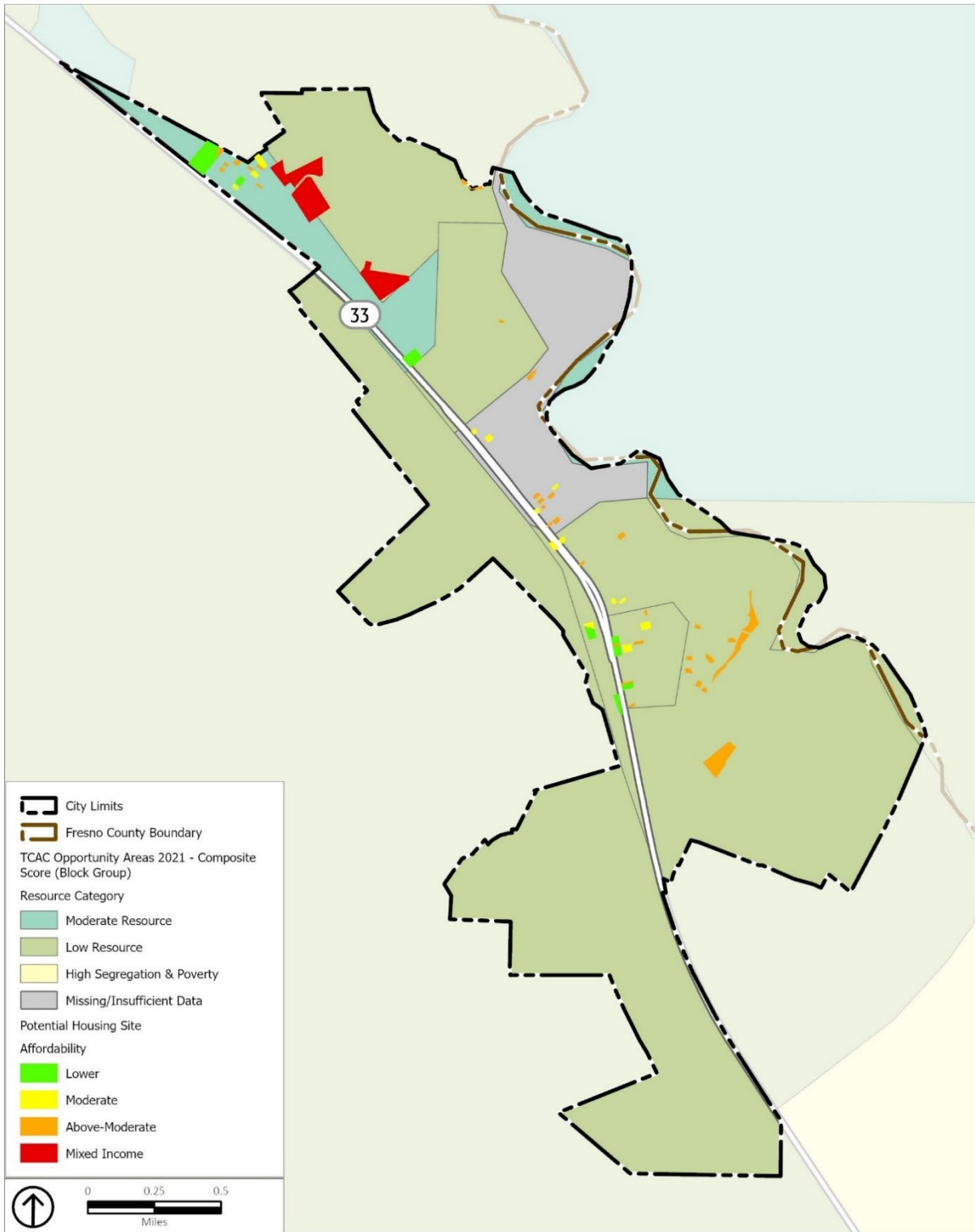
Since 2017, the Tax Credit Allocation Committee (TCAC) and California Department of Housing and Community Development (HCD) have developed annual maps of access to resources, such as high-paying job opportunities; proficient schools; safe and clean neighborhoods; and other healthy economic, social, and environmental indicators to provide evidence-based research for policy recommendations. This effort has been dubbed “opportunity mapping” and is available to all jurisdictions to assess access to opportunities within their community.

The TCAC/HCD Opportunity Area Maps can help to identify areas within the community that provide strong access to opportunity for residents or, conversely, provide low access to opportunity. The information from the opportunity mapping can help to highlight the need for housing element policies and programs that would help to remediate conditions in low-resource areas and areas of high segregation and poverty and to encourage better access for lower-income households and communities of color to housing in high-resource areas. TCAC/HCD categorized census tracts into high-, moderate-, or low-resource areas based on a composite score of economic, educational, and environmental factors that can perpetuate poverty and segregation, such as school proficiency, median income, and median housing prices. The TCAC/HCD Opportunity Area Maps use a regional index score to determine categorization as high, moderate, and low resource.

Areas designated as “highest resource” are the top 20.0 percent highest-scoring census tracts in the region. It is expected that residents in these census tracts have access to the best outcomes in terms of health, economic opportunities, and education attainment. Census tracts designated “high resource” score in the 21st to 40th percentile compared to the region. Residents of these census tracts have access to highly positive outcomes for health, economic, and education attainment. “Moderate resource” areas are in the top 30.0 percent of the remaining census tracts in the region and those designated as “moderate resource (rapidly changing)” have experienced rapid increases in key indicators of opportunity, such as increasing median income, home values, and an increase in job opportunities. Residents in these census tracts have access to either somewhat positive outcomes in terms of health, economic attainment, and education, or positive outcomes in a certain area (e.g., score high for health, education) but not all areas (e.g., may score poorly for economic attainment). Low-resource areas are those that score in the bottom 30.0 percent of census tracts and indicate a lack of access to positive outcomes and poor access to opportunities. The final designation are those areas identified as having “high segregation and poverty;” these are census tracts that have an overrepresentation of people of color compared to the county as a whole, and at least 30.0 percent of the population in these areas is below the federal poverty line (\$27,750 annually for a family of four in 2022).

As seen in **Figure 3-1, Regional TCAC/HCD Opportunity Areas**, in Section 3: Regional Assessment of Fair Housing, most of Fresno County, particularly in the incorporated cities, is primarily a mix of low-resource or moderate-resource areas and areas of high segregation and poverty, with pockets of high-resource designations. The City of Firebaugh has been designated as a low-resource area, with a small moderate-resource area in the northern portion of the city (**Figure 1C-2, Local TCAC/HCD Opportunity Map**).

FIGURE 1C-2 LOCAL TCAC/HCD OPPORTUNITY MAP



Source: TCAC/HCD, 2021

Patterns of Integration and Segregation

At the time of this writing (Summer 2022), HCD's AFFH Data Viewer included the 2021 TCAC/HCD Opportunity Map. Therefore, the following assessment of fair housing is based on data from 2021. However, since the time of writing, the AFFH Data Viewer was updated with the 2022 TCAC/HCD Opportunity Map followed by the subsequent 2022 COG Geography TCAC/HCD Opportunity Map, which is based on a similar formula but compares each tract to those within the COG region rather than regions defined by TCAC. In the case of Fresno County, the comparison region changed from the Central Valley Region to the boundaries of Fresno COG, resulting in internal comparisons of Fresno County cities and communities.

At the COG level, the data for Fresno County presents a potentially skewed perspective as most cities in the county have small populations, housing stocks, and employment centers compared to the cities of Fresno and Clovis. Fresno and Clovis, as the two largest cities in the county and among the largest in the region, provide access to educational and economic opportunities that are not typically found outside of large cities. Further, both, though particularly Clovis, include affluent neighborhoods that influence TCAC scores. Therefore, access to resources using this methodology appears to weigh proximity to Fresno and Clovis more heavily than local resources. For example, in the 2021 TCAC/HCD Opportunity Map, the community of Biola and the City of Kingsburg are both designated as moderate to highest resource areas based on local context. However, in the 2022 COG Geography TCAC/HCD Opportunity Map, both are designated as low resource areas. The number of jobs, school performance, environmental conditions, median incomes, and other factors that are included in the Opportunity Map methodology did not change significantly between 2021 and 2022 in these communities. The primary driver of the change in resource area designation is likely based on proximity to resources and opportunities in the major cities of Fresno County. As many communities in the county are largely rural and agricultural in nature, most local resources have more limited capacity, but do serve the local population.

Given the potential limitations of an internal comparison, FCOG opted to maintain the analysis based on a larger geographic comparison to other jurisdictions in the Central Valley Region to reflect the interconnectedness of economies in this region, and similarities between the size and nature of many communities. Further, no significant changes were made to resource designations in Firebaugh between the 2021 TCAC/HCD Opportunity Map and 2022 COG Geography TCAC/HCD Opportunity Map.

Income Distribution

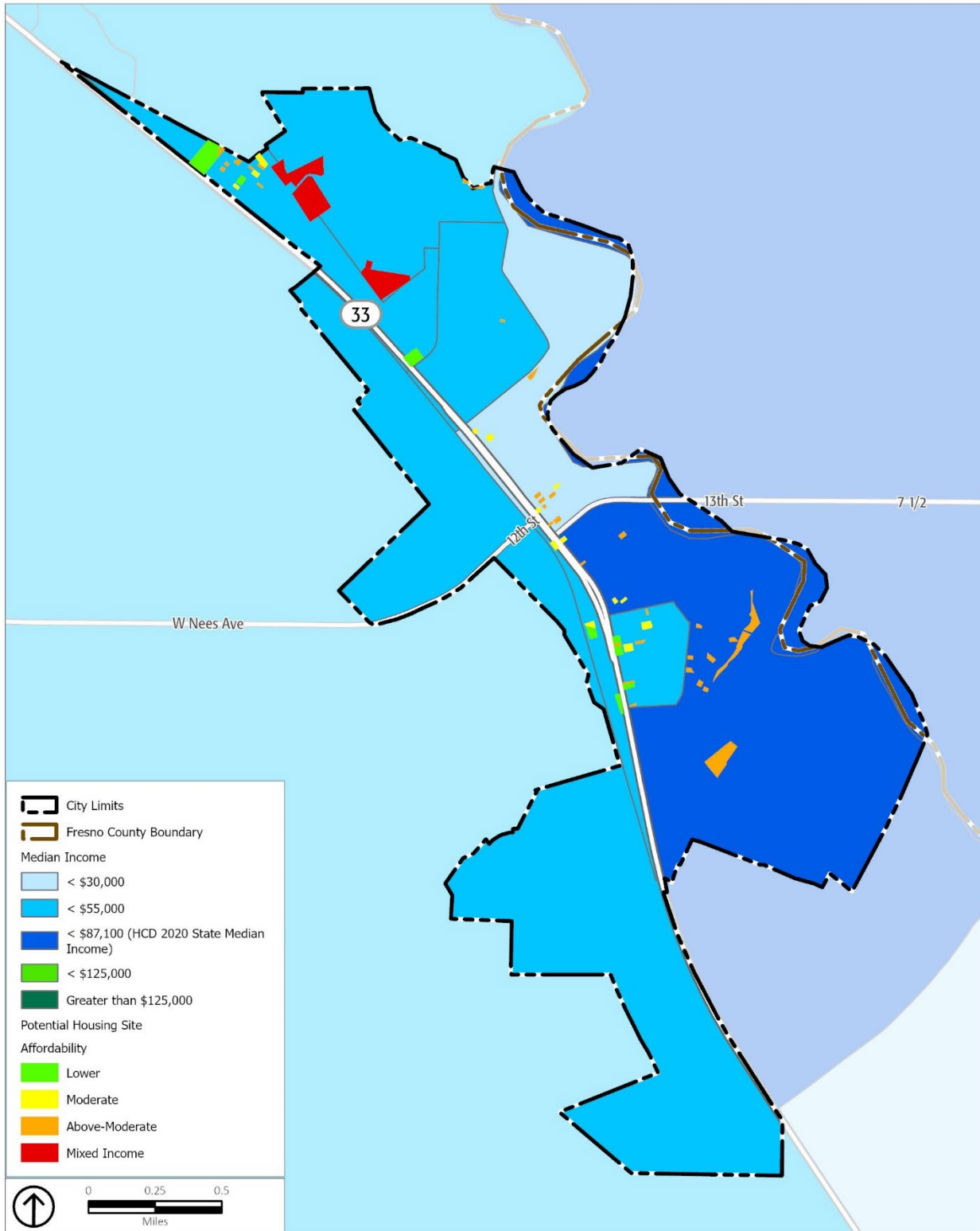
The City of Firebaugh consists of a single census tract and six block groups, three of which include adjacent unincorporated county areas. State Route 33 (SR 33) runs through the city on the west side and Madera County forms the eastern boundary.

The majority of the city has been designated as low resource, with a sliver of a moderate-resource designation along the northwestern edge of the city. A designation has not been determined for the portion of the city between Cline Street to the north, 13th Street to the south, SR 33 on the west, and Madera County line on the east; however, the low scores have been identified for TCAC/HCD Economic Domain, Education Domain, and Environmental Domain, suggesting this area also has characteristics of a low-resource opportunity designation. According to 2016-2020 American Community Survey (ACS) data presented in Figure 2-2, Local Median Income, in Section 2: Housing Needs Assessment, the citywide median household income in Firebaugh is \$36,411, well below the statewide median of \$78,672 and the 2020 Fresno County median of \$57,109.

The City of Firebaugh's central block group containing the West Hills College – Firebaugh campus has the lowest median household income in the city, at \$28,147 (**Figure 1C-3, Local Median Income**). The northernmost block group has a median income of \$43,309, and the adjacent block group east of Clyde Fannon Road, containing the Mendoza Terrace (including Mendoza Terrace II and Mendoza Terrace Elderly) public housing development has a median household income of \$31,667. The median income in the southern block group, which includes Firebaugh High School and the Las Laureles neighborhood, is the highest in the city at \$56,250. Although there is land west of SR 33 in the far western block group included within the city boundaries, it primarily consists of industrial uses and the Firebaugh Airport within the city boundaries and unincorporated county acreage. Therefore, as it does not appear that residential uses are within this portion of the city limits, the median income of \$43,284 for this area is assumed to reflect the residences in the unincorporated county area.

The City of Firebaugh's residential mix is primarily single family and duplexes, at 67.6 percent of the housing stock, with 25.7 percent multifamily of three or more attached units, and mobile homes/other non-permanent units comprising 6.7 percent of the housing stock (within four mobile home parks). Residential uses in the upper portion of the city include homes on scattered agricultural parcels, single-family subdivisions, mobile homes, a multifamily complex, and a significant number of complexes operated by the Fresno Housing Authority. The southern portion of the city is made up primarily of a mix of single-family units, multifamily complexes, and mobile home parks, interspersed with commercial, industrial, and agricultural uses. Single-family homes in residential neighborhoods are typically single-story and small in scale and character, with slightly larger homes just southwest of Lake Joallan. Commercial uses, industrial, and older residential homes are found within the western edge of the city along SR 33. This data contributes to the City of Firebaugh's limited TCAC/HCD resource opportunity designation, likely partially attributed to the primarily agricultural and manufacturing employment base, which typically have lower pay scales, as reflected in the relatively low median incomes in the city.

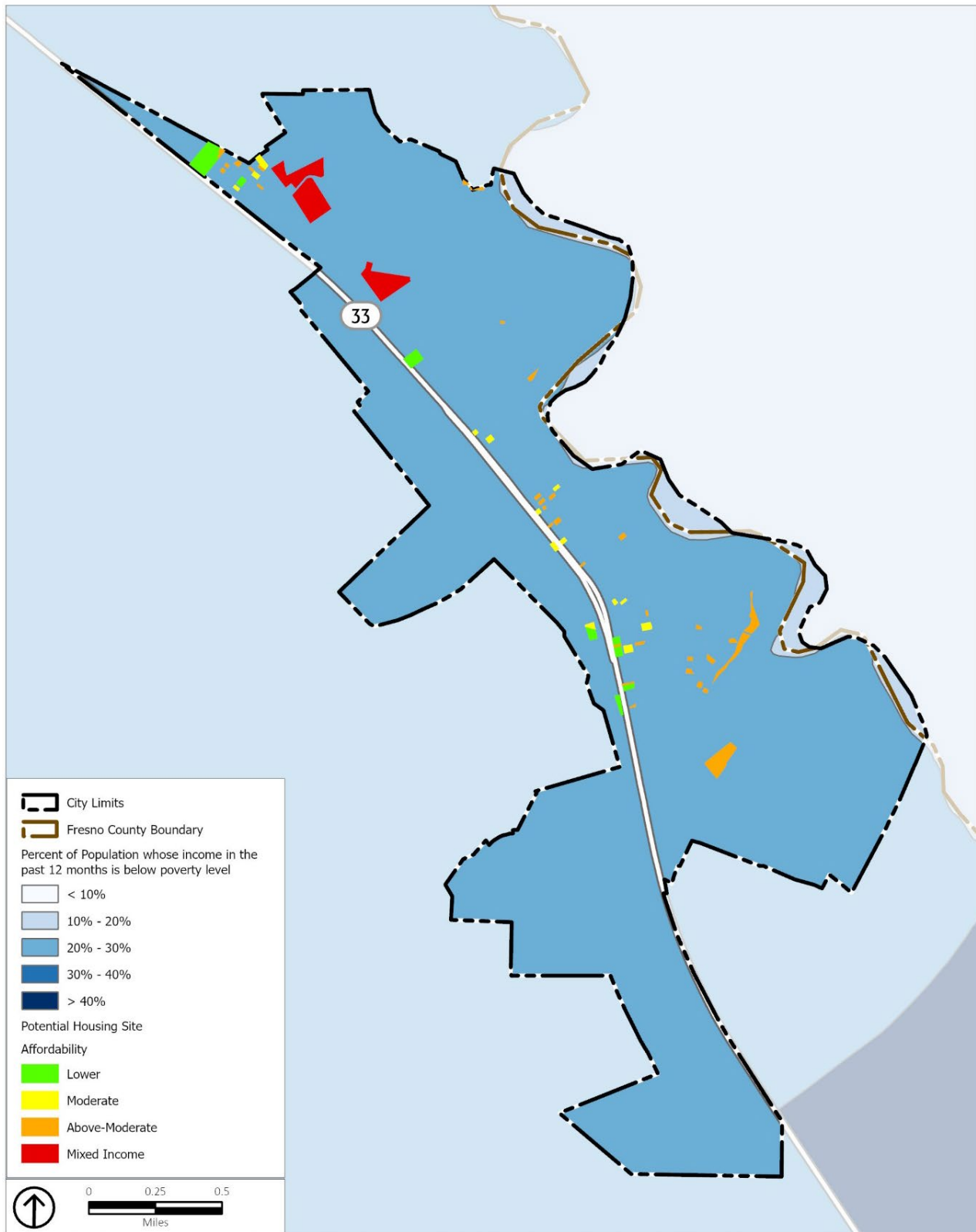
FIGURE 1C-3 LOCAL MEDIAN INCOME



Source: 2015-2019 ACS

According to the 2014-2018 United States Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data, the City of Firebaugh has a higher representation of very low-income households than the countywide average rate of 12.8 percent, as shown in Table 2-9, Jurisdictions with Over-Representation of Very Low-Income (VLI) Families (2018), of Section 2: Housing Needs Assessment. Additionally, 30.3 percent of households make less than 30 percent of the area median income (AMI), which is considered extremely low income (**Figure 1C-4, Local Poverty Rate**). This is significantly higher than the state average of 9.0 percent and the Fresno County rate of 16.7 percent. The rate of poverty for the population of the entire city, which is a single census tract, is between 20.0 and 30.0 percent of the total population. The poverty rate has remained fairly stable, dropping just slightly from 30.8 percent in 2010. The median household income in the City of Firebaugh has increased slightly between 2012 and 2020. Citywide median household income in 2014 was \$32,875, while in 2020, citywide median household income was \$36,411. However, given the extremely low median household income in Firebaugh compared to other jurisdictions in the region and state, households likely have continued to face challenges in finding affordable housing within their incomes and completing necessary repairs to their home.

FIGURE 1C-4 LOCAL POVERTY RATE



Source: US Census (American Communities Survey 2015-2019); City of Firebaugh, 2023; Placemarks, 2023

Racial and Ethnic Characteristics

Firebaugh's largest demographic group is Hispanic, comprising 92.5 percent of the city's population, placing Firebaugh among Fresno County jurisdictions with the highest proportion of Hispanic residents, with all other non-White racial and ethnic groups represented by smaller populations, each comprising less than 1.0 percent of the city's population, with White non-Hispanic residents comprising the remaining 6.2 percent.

There appears to be slightly uneven spatial distribution of demographic groups within Firebaugh (**Figure 1C-5, Local Racial Demographics**), with the distribution of populations of color ranging from 91.1 percent to 98.4 percent across the city, with the southernmost block group with the least diverse population at 78.5 percent non-White. The proportion of demographic groups in Firebaugh only changed slightly between 2010 and 2020, with the proportion of Hispanic residents increasing from 91.2 to 92.4 percent, the White non-Hispanic population decreasing from 7.5 to 6.2 percent, and all other racial/ethnic groups decreasing. A higher percentage of the City of Firebaugh's housing stock is renter occupied, although multifamily units comprise less than 75.0 percent of the total units in the city, suggesting that a sizeable proportion of the single-family units, or mobile home stock, have been converted to rental properties. This data indicates that housing prices in Firebaugh may be more affordable than in other areas of the county and may provide opportunities for increased diversity due to affordability and rental opportunities for a range of households compared to other jurisdictions.

No portion of Firebaugh is identified as a R/ECAP, as defined by HUD, nor does the city contain any racially concentrated areas of affluence (RCAAs). A R/ECAP designation has a two-part threshold:

- R/ECAPs must have a non-white population of 50 percent or more in a metropolitan or micropolitan area, or a non-white population of 20 percent or more outside of these areas.
- R/ECAPs must have extreme poverty, defined as census tracts with either 40 percent or more of individuals living at or below the poverty line or with a poverty rate of three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

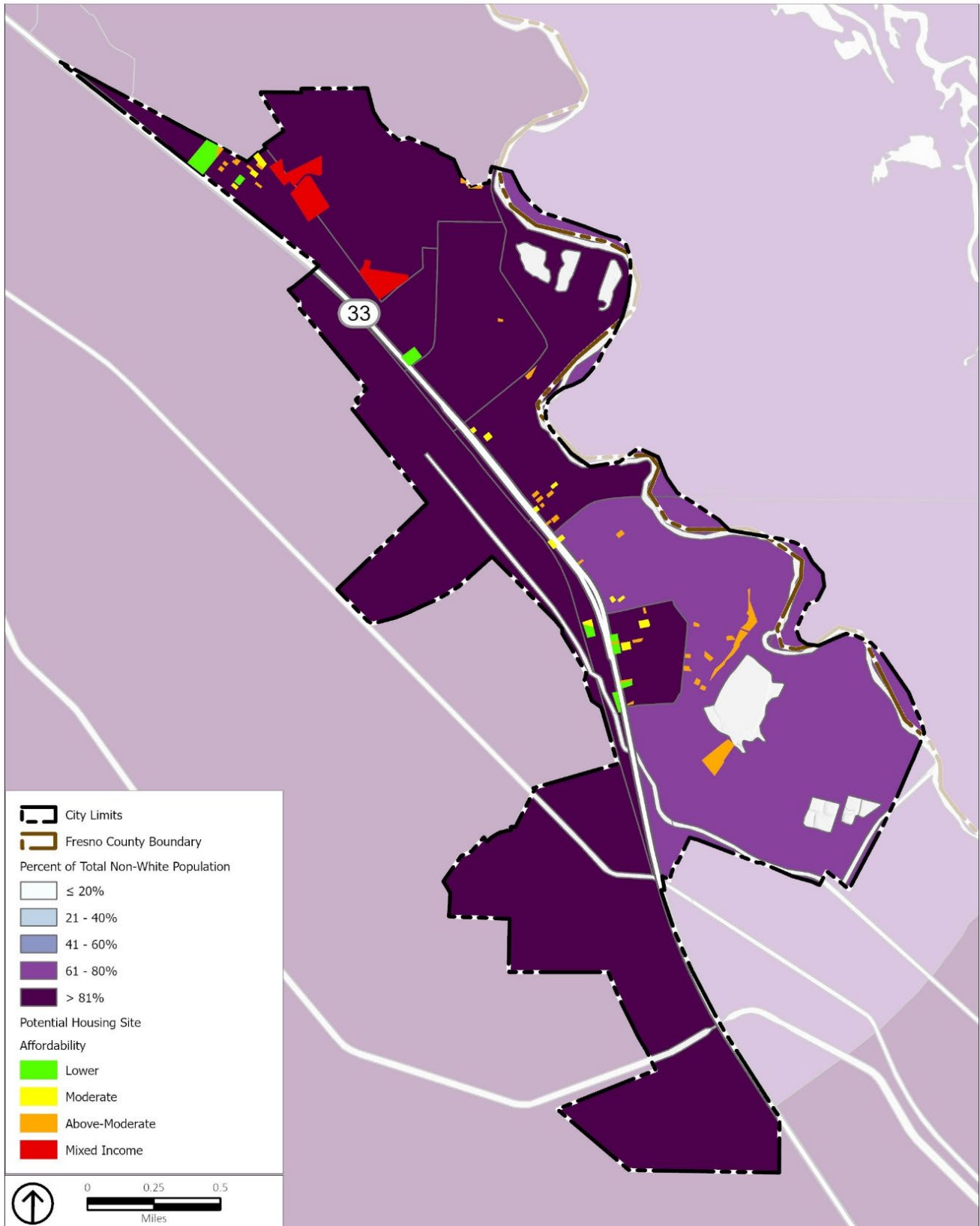
RCAA designations are also based on two factors:

- A location quotient based on the percentage of white, non-Hispanic or Latino population in the census tract compared to the average percentage of total white population for the COG region.
- If the median income for the census tract is greater than 1.5 times the COG median income or State median income, whichever is lower.

However, data indicates that although household income has risen slightly, the high incidence of poverty, low median household incomes, and predominance of communities of color suggests that the entirety of Firebaugh may be nearing the designation of a racially concentrated area of poverty.

Through **Program 4**, the City will provide for a variety of housing types by ensuring that adequate sites are available to meet the City's Regional Housing Needs Allocation (RHNA) of 443 units. As part of **Program 10** the City will work with housing developers to expand affordable housing opportunities throughout the city through actions such as identifying funding opportunities, offering fee reductions and development impact fee deferrals for affordable and special-needs projects, promoting incentives and the State density bonus, and identifying candidate sites for new projects. The City will encourage and support the development of housing for Extremely Low-Income Households through **Program 13** of the Housing Element. The City will also encourage mixed-use projects and residential uses in commercial zones as part of **Program 7**. The City will also encourage and facilitate the development of Accessory Dwelling Units through **Program 15**, which have the potential to be a naturally-occurring affordable housing option, and through **Program 17** the City will encourage the development of a variety of housing types and sizes to accommodate the needs of a wide array of residents at different income levels.

FIGURE 1C-5 LOCAL RACIAL DEMOGRAPHICS



Source: 2015-2019 ACS

Familial Status

Like several other jurisdictions in Fresno County, a majority of households in Firebaugh are considered family households (89.8 percent). Family households are defined by California law as a household of two or more persons, regardless of relationship status. The City of Firebaugh's rate of single-person households is 10.2 percent of total households, compared to 29.1 percent of households in Fresno County overall, and 23.7 percent of households statewide. Seniors living alone, comprising 9.6 percent of households both county- and statewide, comprise 8.0 percent of the City of Firebaugh's households. Overall, Firebaugh is a community of younger families, with a lower total representation of senior households in the city (15.4 percent), compared to county and state proportions, which correlates to a lower representation of seniors living alone than in other jurisdictions.

Approximately 32.2 percent of Firebaugh households are family households headed by single adults, higher than the Fresno County rate of 22.2 percent and 21.0 percent in California. Firebaugh's proportion of single-parent, female-headed family households is 21.6 percent of total households, and 10.6 percent of households are single parent, male-headed family households. Approximately 41.0 percent of female-headed households include their own children, and 41.9 include children by marriage, adoption, or foster status. In contrast, 8.4 percent of single-parent, male-headed households include their own children, and 56.8 percent live with children by marriage, adoption, or foster status. Just under half (48.4 percent) of female-headed households with children have household incomes below the poverty line. The spatial distribution of single female-headed households with children in poverty is difficult to establish with data available only at the tract level in a single census tract jurisdiction. However, more detailed 2015-2019 ACS median income data available through the HCD AFFH Data Viewer mapping tool provides a better picture of poverty distribution (**Figure 1C-4, Local Poverty Rate**).

The northwestern corner of the city has approximately 47.5 percent of households with incomes below the poverty threshold, the highest concentration in the City of Firebaugh, followed by an estimated incidence of poverty at 35.8 percent within the southern portion of the city bound by 13th Street on the north, inclusive of commercial/light industrial uses, the older central Firebaugh neighborhoods, the Firebaugh Middle School, Firebaugh High School, Hazel M. Bailey Primary School, and the Las Laureles neighborhood. The potential for a concentration of single, female-headed households in this block group is likely due to the proximity of K-12th grade educational and Dunkle Park facilities within this area. The upper central area between Clyde Fannon and the San Joaquin River Canal, in which the Mendoza Terrace Public Housing units are located, has a slightly lower incidence of poverty estimated at 32.2 percent. The central section of the city, in which the West Hills College, Coalinga – Firebaugh Campus is located, has the lowest estimated proportion of households below the poverty threshold, at 27.9 percent.

The high presence of single, female-headed households with children in Firebaugh at 21.6 percent of total households as compared to 14.2 percent of households in Fresno County and 11.3 percent in the state indicates that single-parent, female-headed households with children may have greater access to more affordable housing in the City of Firebaugh where three affordable housing complexes, public housing units, and four mobile home parks are located. Additionally, rents and housing prices in Firebaugh are among the lowest in the county, contributing to the presence of a high concentration of single-parent households, communities of color, and lower-income households.

Single-person households constitute 10.2 percent of total households, compared to 29.1 percent of households in Fresno County overall, and 23.7 percent of households statewide. Slightly more single-person households are renters, at 53.3 percent, compared to 46.7 percent owners. Seniors living alone, comprising 9.6 percent of households both county- and statewide, constitute 8.0 percent of Firebaugh’s households. Of the seniors living alone, 81.1 percent are homeowners, and the remaining 18.9 percent are renters. This lower representation of seniors living alone in Firebaugh reflects the family-oriented composition of seniors in the city, comprising 10.2 percent of the population and 22.3 percent of the total households. These findings suggest that although Firebaugh may be an affordable place for senior couples to retire, or that senior couples have aged in place and remain in their homes to maintain affordability, there may not be an adequate stock of rental units accessible to seniors living alone, or that seniors who rent must compete for the rental properties in the city. Additionally, the majority of services and amenities for seniors (in particular medical providers and hospitals) are in the eastern side of Fresno County, and may be difficult to access for those that are transit-dependent or disabled.

As part of **Program 17**, the City will encourage the development of a variety of housing types and sizes to accommodate the needs of a wide array of residents at different income levels. Through **Program 4**, the City will provide for a variety of housing types by ensuring that adequate sites are available to meet the City’s Regional Housing Needs Allocation (RHNA) of 443 units. The City will also encourage mixed-use projects and residential uses in commercial zones as part of **Program 7**. The City will also encourage and facilitate the development of Accessory Dwelling Units through **Program 15**, which have the potential to be a naturally-occurring affordable housing option.

Disability Rates and Services

Persons with disabilities typically have special housing needs due to physical and/or developmental capabilities, fixed or limited incomes, and higher health costs associated with their disabilities. Seniors typically experience disabilities at higher rates. Approximately 6.6 percent of Firebaugh’s population lives with one or more types of disabilities, well below both the Fresno County average of 12.9 percent and state average of 10.7 percent, and the third-lowest rate in the county after San Joaquin and Mendota. Although there is a moderate population of senior residents (10.2 percent) in the city, only 34.2 percent of the senior population in Firebaugh experiences one or more disabilities, again the third-lowest rate in the county after San Joaquin and Mendota at 13.1 and 29.4 percent, respectively.

The spatial distribution of residents living with disabilities within a single census tract is difficult to specify given the availability of data. However, the distribution of the senior population within block groups may provide insight into which neighborhoods might have higher rates of disability. Within the central Firebaugh and Las Laureles southern block group neighborhoods, seniors comprise 13.0 percent of the population, which, assuming a disability rate of 34.2 percent, would be 4.4 percent of the population in the block group. When a similar rate of disability is applied to the senior population in the other block groups in the city, it appears that this older central area may have the highest rate of disability among seniors (**Figure 1C-6, Percentage of the Population with a Disability in Firebaugh**). The distribution of Firebaugh residents living with disabilities has shifted between 2014 and 2020, decreasing throughout the city. In 2014, the disability rate was 8.3 percent compared to 6.6 percent in 2020, with seniors comprising 28.9 percent of total disabilities. Further, in 2014, 37.1 percent of seniors

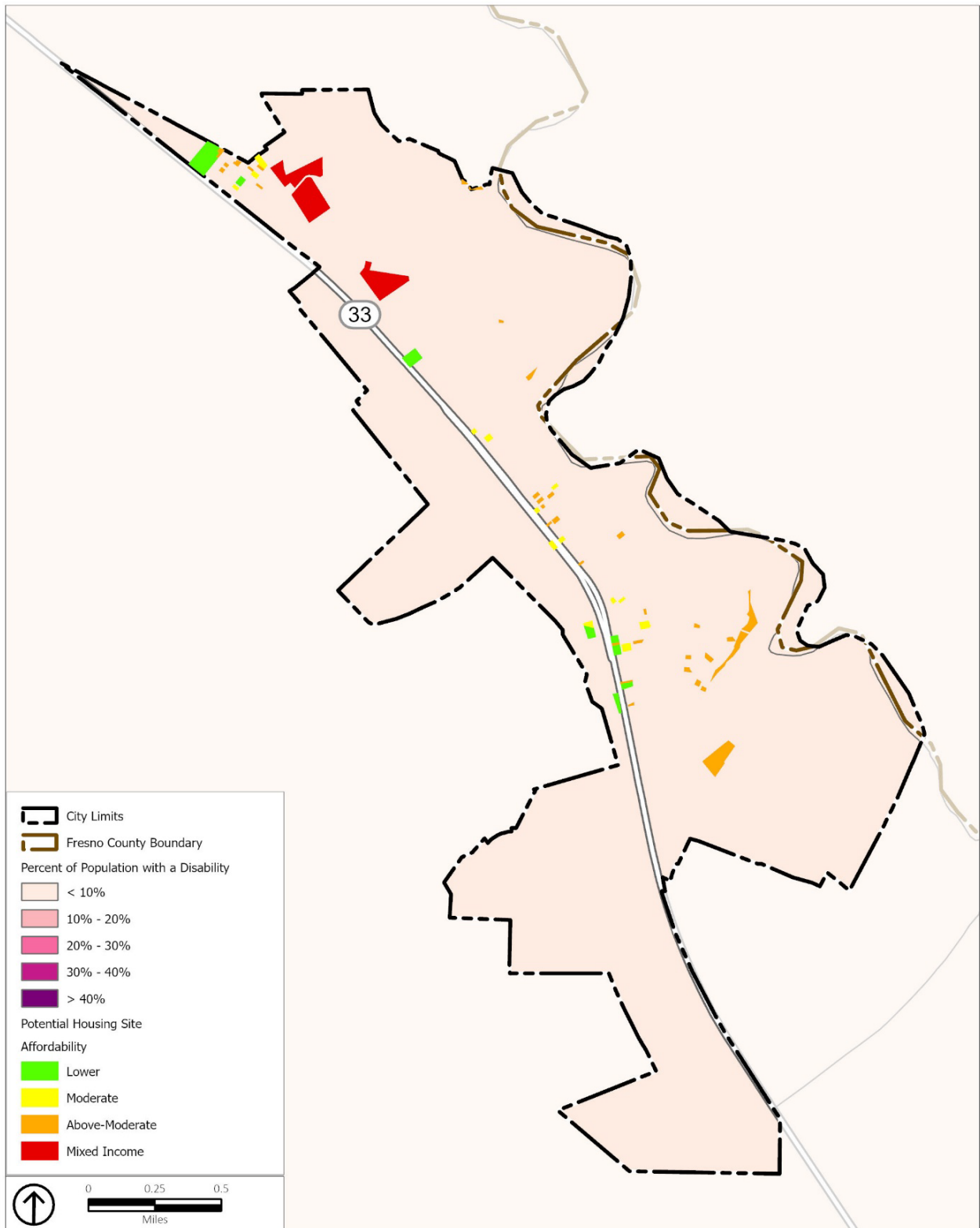
in the city experienced one or more disabilities, higher than in 2020. The decrease in the proportion of the population with disabilities may indicate that persons with disabilities are not able to locate housing with physical accommodations suitable to their individual type of disability, or access necessary resources and services in Firebaugh catering to persons with disabilities, and therefore have relocated to other areas of the county.

As shown on **Table 2-33, Disability by Type (2020)**, in Section 2: Housing Needs Assessment, ambulatory disabilities were the most prevalent disability type, with 69.7 percent of the population with a disability reporting this challenge. The next-most common disability was independent living problems at 43.2 percent, cognitive difficulties at 31.8 percent, and self-care difficulties at 28.8 percent. Vision difficulties and hearing problems represented less than 10.0 percent of the population with a disability. While regulations adopted by the State require all ground-floor units of new apartment complexes with five or more units to be accessible to persons with disabilities, single-family units have no accessibility requirements. In a community where 61.5 percent of housing stock is made up of single-family units, with an additional 6.2 percent duplex and 15.2 percent tri- and four-plex units, the availability of homes available to meet the needs of physically disabled persons, who generally require modifications to their housing units, such as wheelchair ramps, elevators or lifts, wide doorways, accessible cabinetry, and modified fixtures and appliances, may be a significant constraint. Firebaugh also has a small population of residents with developmental disabilities (less than 1.0 percent of total population), of which, approximately 66.7 percent are under 18 years of age and live at home, with parents or a caregiver.

Residents with disabilities in Firebaugh are served by the Fresno County Senior Resource Center, which operates an Adult Protective Services program, assisting both disabled adults and seniors, with all requests for assistance. The Fresno County Human Services System, Department of Adult Services, also provides housing and basic needs assistance to elderly persons. The Fresno/Madera Area Agency on Aging (FMAAA) provides connections to programs, services, and resources elderly residents can use to maintain and improve their quality of life as they age. Firebaugh residents also have access to the Dial-A-Ride program, operated by the local Fresno County Rural Transit Agency (FCRTA) subsystem, which offers transportation services to the elderly (65+), disabled, low-income, and the general public. Dial-A-Ride services are wheelchair equipped and operate Monday through Friday between 8:30 a.m. and 4:15 p.m., with fares priced \$1.00 one-way or \$2.00 round-trip. There are licensed, no residential care facilities or elderly assisted living facilities in Firebaugh however, which may present a barrier to residents in need of ongoing support and may increase displacement risk for this population.

The City will encourage and support the development of housing for Extremely Low-Income Households, including persons with disabilities, through **Program 13** of the Housing Element. Through **Program 21** the City will encourage housing developers to include mobility-impaired accessibility in their project designs. Through **Programs 8 and 9** the City will apply for HOME and Community Development Block Grant funding which could be used for a variety of applications, including assisting with rental housing for extremely low income and disabled residents and rehabilitating housing for lower-income households. As part of **Program 10** the City will work with housing developers to expand affordable housing opportunities through actions such as identifying funding opportunities, offering fee reductions and development impact fee deferrals for affordable and special-needs projects, promoting incentives and the State density bonus, and identifying candidate sites for new projects.

FIGURE 1C-6 PERCENTAGE OF THE POPULATION WITH A DISABILITY IN FIREBAUGH



Source: U.S. Census (American Communities Survey 2015-2019); City of Firebaugh, 2023; Placeworks, 2023

Access to Opportunity

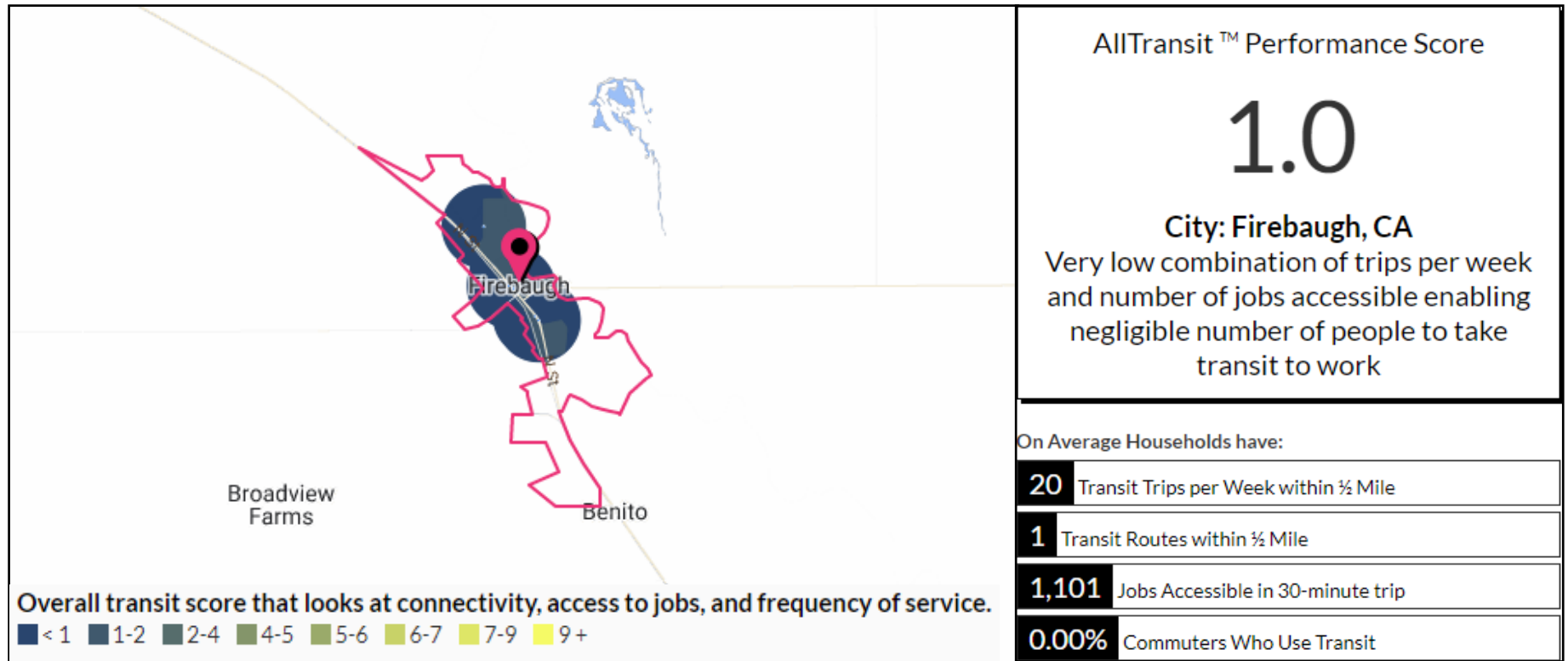
Transit Mobility

Transit mobility refers to an individual’s ability to navigate the city and region on a daily basis to access services, employment, schools, and other resources. Indicators of transit mobility include the extent of transit routes, proximity of transit stops to affordable housing, and frequency of transit.

Firebaugh residents are primarily served by the FCRTA providing fixed-route service between Firebaugh, Mendota, Kerman, and Fresno on the Westside Line (see Figure 3-19, Fresno County Rural Transit Agency Intercounty Routes, of Section 3: Regional Assessment of Fair Housing). Buses depart from Firebaugh Senior Center on weekdays at 7:00 a.m. and 1:30 p.m., stopping in Firebaugh, Mendota, and Kerman before arriving in Fresno after approximately 70 to 75 minutes. Return service departs from Fresno at 9:40 a.m. and 4:12 p.m. Service is provided on 30-passenger, Americans with Disabilities Act (ADA) wheelchair-accessible buses. Monthly passes for general service between Firebaugh and Fresno are priced at \$120.00, with discounted fares available for senior, youth, and disabled residents, at \$100.00 monthly. FCRTA Westside Line service stops within Firebaugh include Firebaugh Senior Center, Family Dollar, and Sunset Place. With daily access to the City of Fresno, the FCRTA Westside Line also provides access to employment opportunities and connections to regional transit services, including Amtrak, Greyhound, and Fresno Area Express (FAX), which in turn provide connections within the metropolitan Fresno area and between Stockton, Bakersfield, and other regional hubs.

AllTransit is a transit and connectivity analytic tool developed by the Center for Neighborhood Technology for the advancement of equitable communities and urban sustainability. The tool analyzes the transit frequency, routes, and access to determine an overall transit score at the city, county, and regional levels. AllTransit scores geographic regions (e.g., cities, counties, Metropolitan Statistical Areas [MSAs]) on a scale of 0 to 10, with 10 being complete transit connectivity. **Figure 1C-7, Firebaugh AllTransit Performance Score**, shows Firebaugh’s AllTransit Performance score, including metrics representing average household transit access. Firebaugh’s score is 1.0, demonstrating “very low” connectivity. **Table 1C-2, Fresno County Jurisdictions AllTransit Performance Scores**, shows transit accessibility in Firebaugh relative to other Fresno County jurisdictions. Firebaugh’s score is consistent with most Fresno County jurisdictions, which are typified by smaller rural and semi-rural communities. However, as described in Section 3: Regional Assessment of Fair Housing, the AllTransit methodology may not fully reflect the transit opportunities available through private service providers. Among Fresno County jurisdictions, the City of Fresno represents an outlier both in terms of population size, degree of urbanization, and transit accessibility.

FIGURE 1C-7 FIREBAUGH ALLTRANSIT PERFORMANCE SCORE



Source: AllTransit.cnt.org, 2022

TABLE 1C-7 FRESNO COUNTY JURISDICTIONS ALLTRANSIT PERFORMANCE SCORES

Jurisdiction	Score
City of Fresno	5.0
Fresno County	3.2
Reedley	2.2
Fowler	1.5
Huron	1.2
Clovis	1.1
Coalinga	1.1
Parlier	1.0
Firebaugh	1.0
Mendota	0.9
Sanger	0.9
Selma	0.7
Kingsburg	0.7
Kerman	0.1
San Joaquin	0.0

Source: AllTransit.cnt.org, 2022

Housing Mobility

As discussed in the Housing Tenure section of Section 2: Housing Needs Assessment, approximately 53.3 percent of occupied households in Firebaugh are renting, with rates of renter- and owner-occupancy evenly distributed across the city. A healthy housing market is generally considered to have a 5.0 percent vacancy rate. As shown in Section 2: Housing Needs Assessment, Table 2-18, for 2022, the California Department of Finance (DOF) reported an overall vacancy rate of 8.1 percent in Firebaugh. Vacancy data is not available by tenure through the DOF; however, the 2020 ACS 5-year estimate indicates a rental vacancy rate of 2.3 percent and an ownership unit vacancy rate of 0.0 percent, with a similar overall vacancy rate of 4.0 percent. ACS 5-year estimate vacancy rates draw on large sample sizes and may not precisely represent vacancy on the ground. Instead, these rates are presented as general estimates, indicating approximate conditions in the local housing market.

In Firebaugh, a substantial proportion of vacant properties were categorized as being for seasonal use (either recreational or for seasonal laborers) or as “other vacant,” a category of properties that are vacant but not immediately available for rent or purchase. Properties may be categorized as “other vacant” due to one or more factors, which may include ongoing legal proceedings, active renovation or repair, abandonment, or an owner’s preference for vacancy, among other potential factors. These categories of vacancy are accounted for in the overall vacancy rate estimate but are not included in the rental and ownership vacancy rate estimates, which only consider those units immediately available for rent or purchase.

Firebaugh's low rental vacancy rate indicates a tight rental market with fewer housing mobility opportunities for current and prospective renters. Similarly, the very low ownership unit vacancy rate indicates an absence of available homes for sale in Firebaugh for prospective homebuyers.

The 2020 ACS 5-year estimate indicates that median gross rent is \$655 in Firebaugh, substantially lower than the \$1,029 reported for Fresno County (see Section 2: Housing Needs Assessment). However, Firebaugh's vacancy rates and median rents make it one of Fresno County's most affordable jurisdictions (see Section 2: Housing Needs Assessment). This suggests that residents living in Firebaugh, or seeking to live in Firebaugh, have similar mobility options overall compared to most of the region. In the census tract that includes Firebaugh, 3.7 percent of renters use Housing Choice Vouchers (HCVs); however, it should be noted that this tract includes some sparsely populated areas outside of Firebaugh's jurisdiction. This rate is similar to that of Parlier, parts of Clovis, and the eastern half of Kerman, but generally lower than most parts of the County for which this data is available.

Median rent in Firebaugh increased by 4.5 percent between 2010 (\$627) and 2020 (\$655), indicating that renting costs have remained relatively stable in recent years. In addition, as found in Section 2: Housing Needs Assessment, Table 2-22, Home Sales Recorded in 2021-22, home prices in Firebaugh have decreased by 1.6 percent between 2021 and 2022. While rent is relatively affordable in Firebaugh, a shortage of available housing units both for rent and for sale may indicate limited mobility options for prospective renters and homebuyers.

The City will take a variety of strategies to promote housing mobility. The City will coordinate with the Housing Authority in **Program 29** to continue the Housing Choice Voucher (HCV) program in Firebaugh and will disseminate information to landlords and property owners about the program. Through **Program 8** the City will pursue HOME funding which could be used to provide financial assistance to first-time homebuyers. The City will increase the number of affordable housing opportunities overall through **Program 10**, through actions such as identifying funding opportunities, offering fee reductions and development impact fee deferrals for affordable and special-needs projects, promoting incentives and the State density bonus, and identifying candidate sites for new projects.

Employment Opportunities

The HUD jobs proximity index measures employment accessibility in residential neighborhoods by calculating distances to potential job locations within the area, with larger employment centers weighted more heavily, and factoring in the population size of the local workforce. According to this index, most residential areas in Firebaugh score "furthest proximity" (**Figure 1C-8, Jobs Proximity Index**). A small section of the city with fewer residential uses are found in block groups determined to have "closest proximity." This may be due in part to these areas' marginally closer proximity to SR 33. Although most of Firebaugh's residential areas have jobs proximity index scores among the lowest of Fresno County jurisdictions, the city's boundary does intersect tracts of both "furthest" and "closest" proximity, an inconsistency potentially indicating that Firebaugh's actual access to employment may not be accurately reflected by the scoring index methodology.

Notable industries in Firebaugh include agriculture and secondary businesses (e.g., shipping and logistics) with business activities largely conducted outside of city limits. Approximately 78.4 percent of Firebaugh residents commute outside of the city for work, with 21.6 percent of residents both living and working within city limits. This figure has remained consistent over time – in 2010, 81.1 percent of Firebaugh residents commuted outside of the city for work.² Firebaugh residents primarily work in Agriculture, Forestry, Fishing and Hunting (27.4 percent), Manufacturing (13.6 percent), Educational Services (11.5 percent), and Health Care and Social Assistance (10.2 percent) industries.³ The distance that residents of Firebaugh commute to reach their place of employment is relatively evenly distributed. Approximately 32.5 percent of Firebaugh residents live within 10 miles of their job, 22.1 percent live 10 to 24 miles from their job, 20.4 percent live 25 to 50 miles from their job, and 24.9 percent live more than 50 miles from their job. Of these residents, most are commuting southeast to the City of Fresno. According to the ACS, the jobs-housing ratio in Firebaugh has improved since 2010. In 2010, the ratio was 0.74, indicating a shortage of jobs for the number of housing units. By 2020, the ratio had increased to 0.96, which, while still short of fully balanced, reflects a significant improvement. However, as shown in **Figure 1C-9, Zoning in Firebaugh**, commercial activity within Firebaugh is focused along N Street and O Street. Given the nature of the city’s main industries though, many Firebaugh residents will likely continue to work outside of the city.

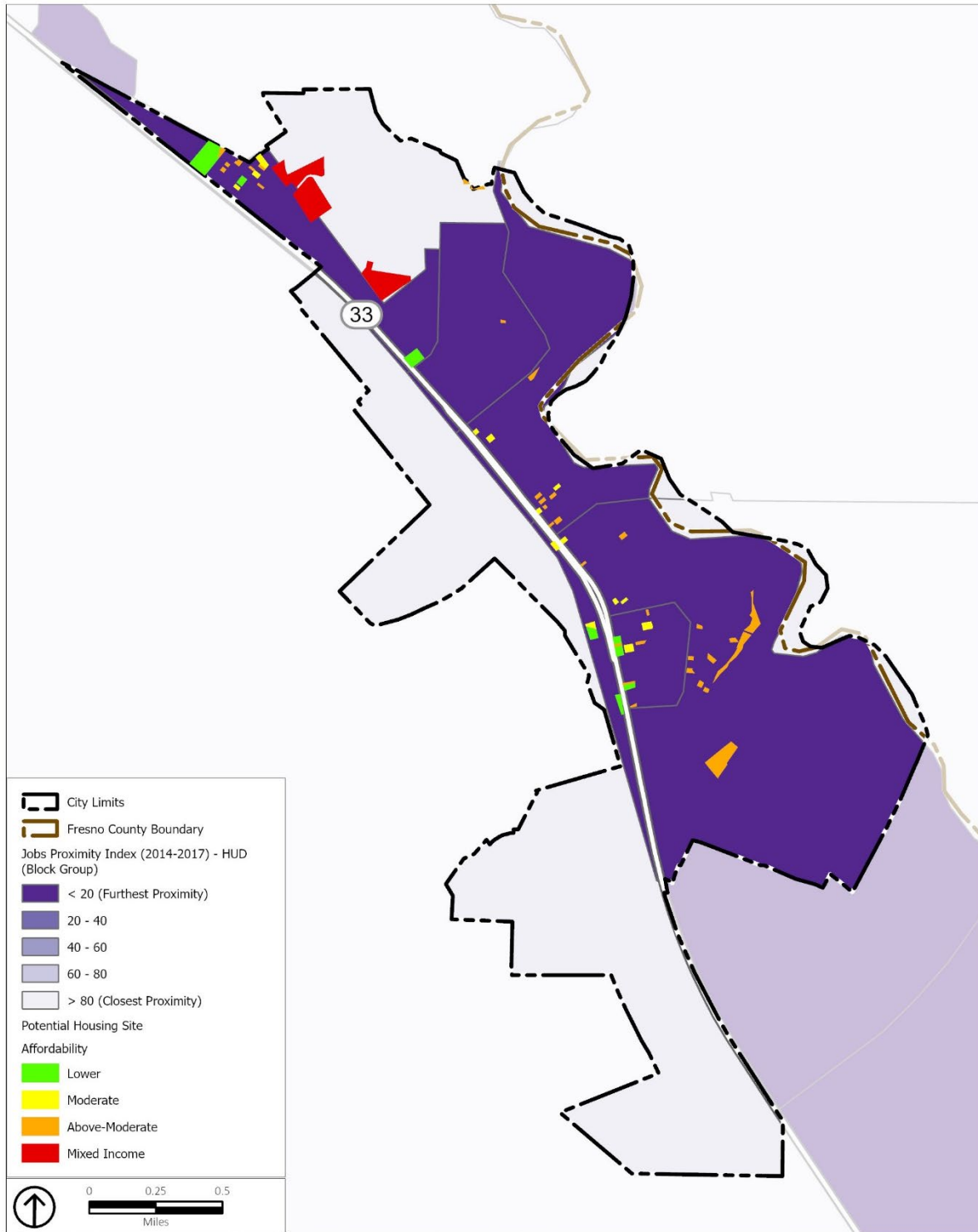
The prevalence of residential uses in Firebaugh reflects the city’s relatively low scores for HUD’s jobs proximity index.

Through **Program 19** of the Housing Element the City will consider hiring a marketing firm to promote Firebaugh as a way to increase the number of local job opportunities and improve economic diversification.

² U.S. Census Bureau, 2022, Longitudinal Employer Household Dynamics (LEHD) Origin-Destination Statistics (2002-2019). Washington, DC: U.S. Census Bureau, Longitudinal-Employer Household Dynamics Program, accessed September 2022.

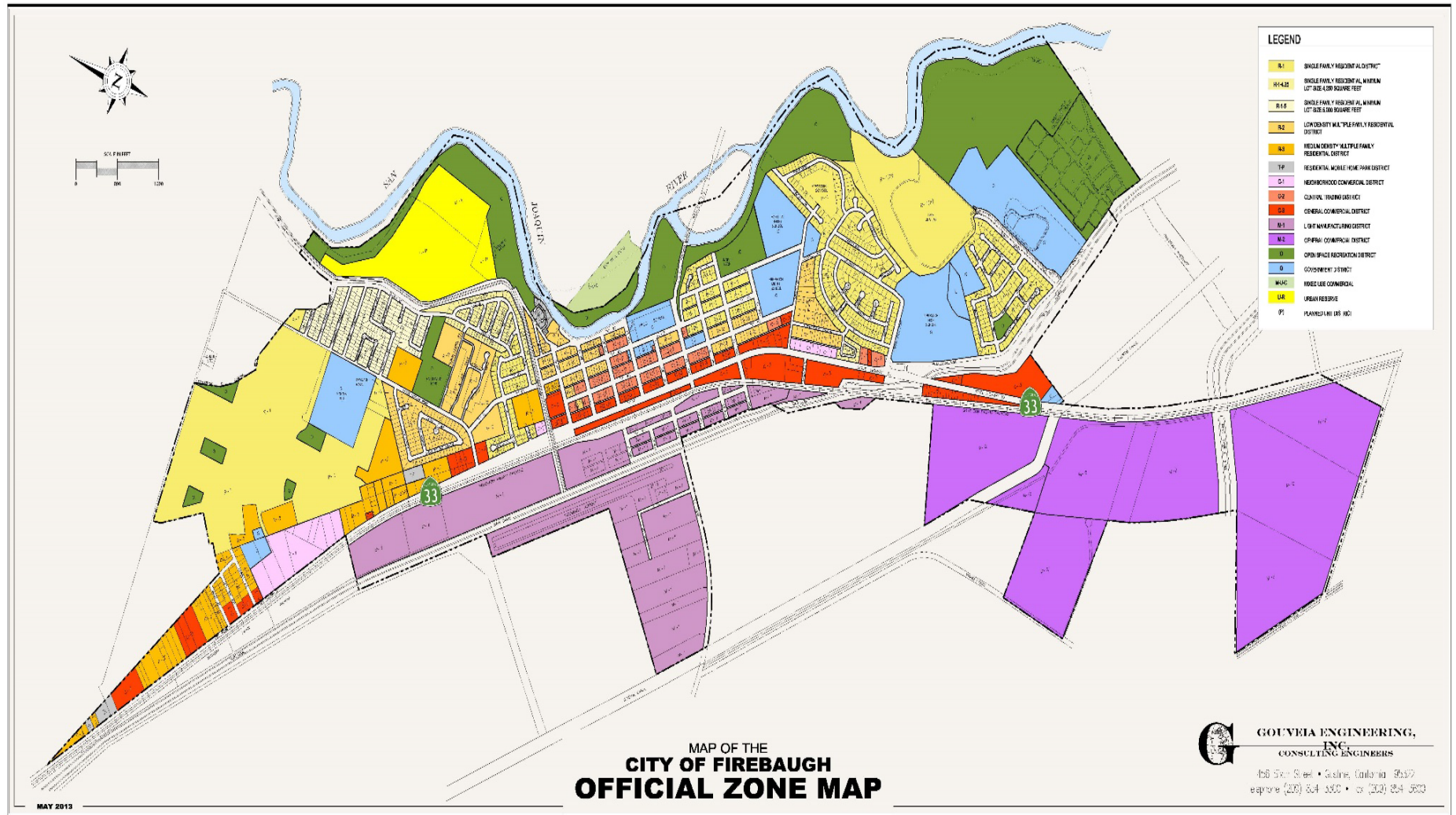
³ U.S. Census Bureau, 2022, Longitudinal Employer Household Dynamics (LEHD) Origin-Destination Statistics (2002-2019). Washington, DC: U.S. Census Bureau, Longitudinal-Employer Household Dynamics Program, accessed September 2022.

FIGURE 1C-8 JOBS PROXIMITY INDEX



Source: HUD, 2017

FIGURE 1C-9 ZONING IN FIREBAUGH



Source: City of Firebaugh, 2014; accessed October 2022

Note: The M-U-C zone is still included in the City of Firebaugh Zoning Code Map legend but no land in the city currently has this zoning designation.

Educational Opportunities

Firebaugh students are served by the Firebaugh-Las Deltas Unified School District, which has six public schools reported on by the California Department of Education (CDE), including one community day school, one primary school, one intermediate (K-8) school, one middle school, one high school, and one alternative high school. Availability of performance scores for the community day school and alternative high school program is limited. These schools include El Puente High and Firebaugh Community Day School, and typically serve students who have experienced challenges in traditional school environments. While these schools have limited data on performance scores for English language arts (ELA) and Mathematics, they offer a valuable resource for students to continue their education in a supportive environment.

Of the four schools for which ELA and mathematics performance scores were available in 2019, CDE reported that most schools in the district are below the state grade-level standards for both subjects, with the exception of the mathematics score for Hazel M. Bailey Primary school (see **Table 1C-8, School Performance Scores in Firebaugh**).

The proportion of each non-alternative school's population that was considered socioeconomically disadvantaged in 2019 was generally high, ranging from 90.0 percent at Hazel M. Bailey Primary, to 93.7 percent for students at Arthur E. Mills Intermediate school, with all other schools falling between these. Hazel M. Bailey Primary is in an area with a median household income of \$56,250 and where the TCAC/HCD Educational Domain Score, or projected educational outcome, is in the 22nd percentile. Arthur E. Mills Intermediate school is in a census block group with a median income of \$28,147, and a TCAC/HCD Educational score also the 22nd percentile.

In Firebaugh, the spatial distribution of schools in relation to household median income is consistent with school performance, and the relatively low ELA and math scores among all schools indicate that students generally have access to similarly performing schools. Anticipated educational outcomes, according to TCAC and HCD, does not vary throughout the city, with the entirety of Firebaugh having TCAC/HCD Educational Domain scores indicating “less positive education outcomes” (**Figure 1C-10, Local TCAC/HCD Educational Domain Score**). This expected educational outcome score, along with the relatively low ELA and math scores among all schools, indicates that students in different parts of Firebaugh generally have access to similarly performing schools.

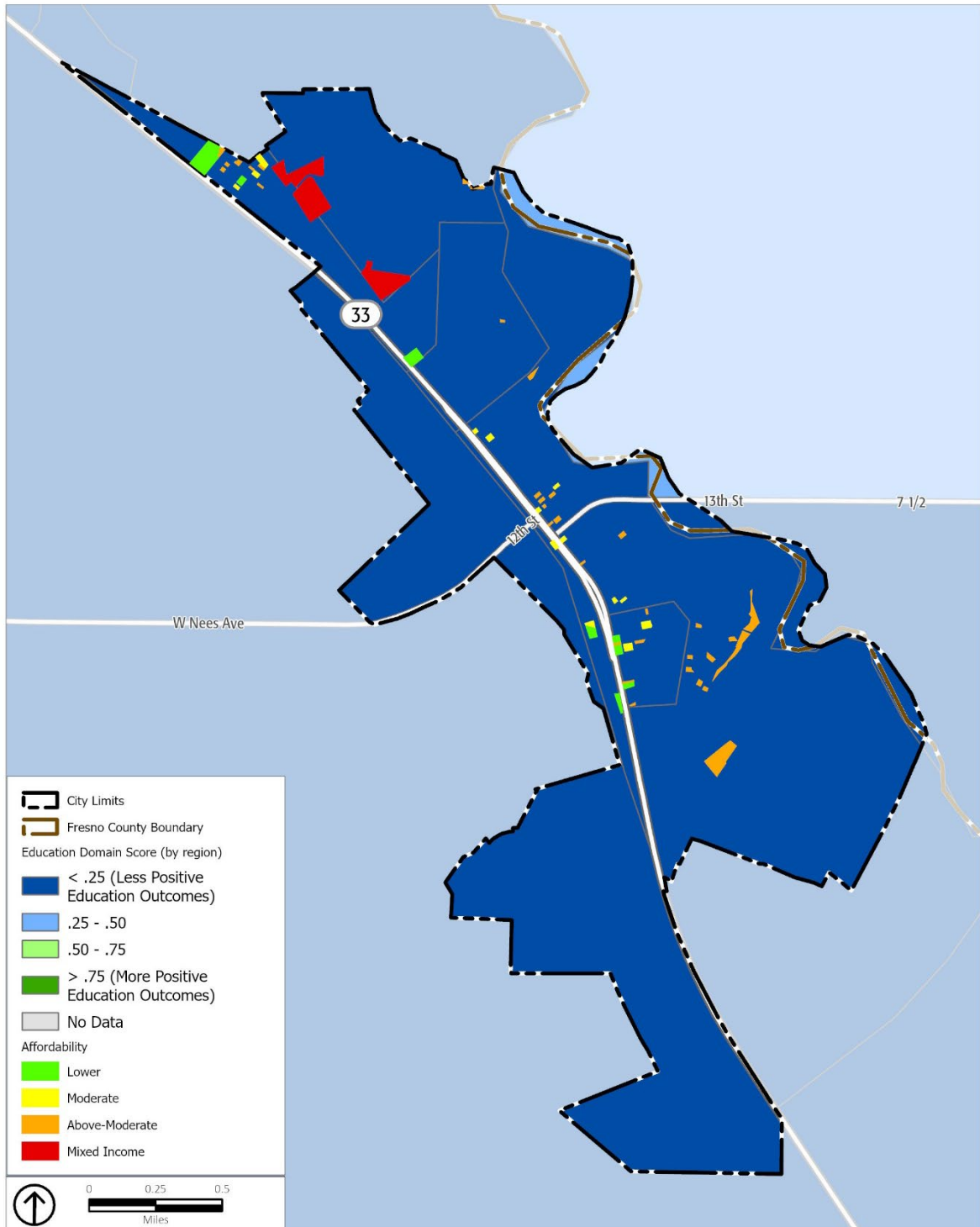
The City will coordinate with the school district as part of **Program 31** to analyze whether housing security poses a barrier to school performance. The City will also work with the school district to assist in securing grant funding for teacher recruitment and other incentives for teachers to facilitate positive learning environments citywide.

TABLE 1C-8 SCHOOL PERFORMANCE SCORES IN FIREBAUGH

School Name	ELA Score	Math Score	Chronic Absenteeism Rate	Suspension Rate	Socioeconomically Disadvantaged	Foster Youth	English Learners
Arthur E. Mills Intermediate	-12.4	-19.9	4.7%	1.8%	93.7%	0.0%	51.4%
El Puente High (Alternative)	-	-	-	6.7%	80.0%	0.0%	80.0%
Firebaugh Community Day	-	-	-	0.0%	100.0%	0.0%	40.0%
Firebaugh High	-12.4	-109.4	-	6.0%	90.6%	0.0%	21.8%
Firebaugh Middle	-0.4	-49.0	5.5%	8.9%	91.6%	0.0%	23.7%
Hazel M. Bailey Primary	-8.8	+7.8	7.1%	0.0%	90.0%	0.0%	62.2%

Source: California Department of Education, 2019

FIGURE 1C-10 LOCAL TCAC/HCD EDUCATIONAL DOMAIN SCORE



Source: California Tax Credit Allocation Committee, 2021; City of Firebaugh, 2023; Placeworks, 2023

Environmental Health

The California Office of Environmental Health Hazard Assessment (OEHHA) reports CalEnviroScreen 4.0 scores for Firebaugh demonstrating relatively adverse environmental conditions citywide, with census tracts in and around Firebaugh scoring at the 89th percentile (**Figure 1C-11, CalEnviroScreen Scores**). In Firebaugh, residents in different parts of the jurisdiction experience the same scores, indicating that residents across the city do not have different access to environmental outcomes.

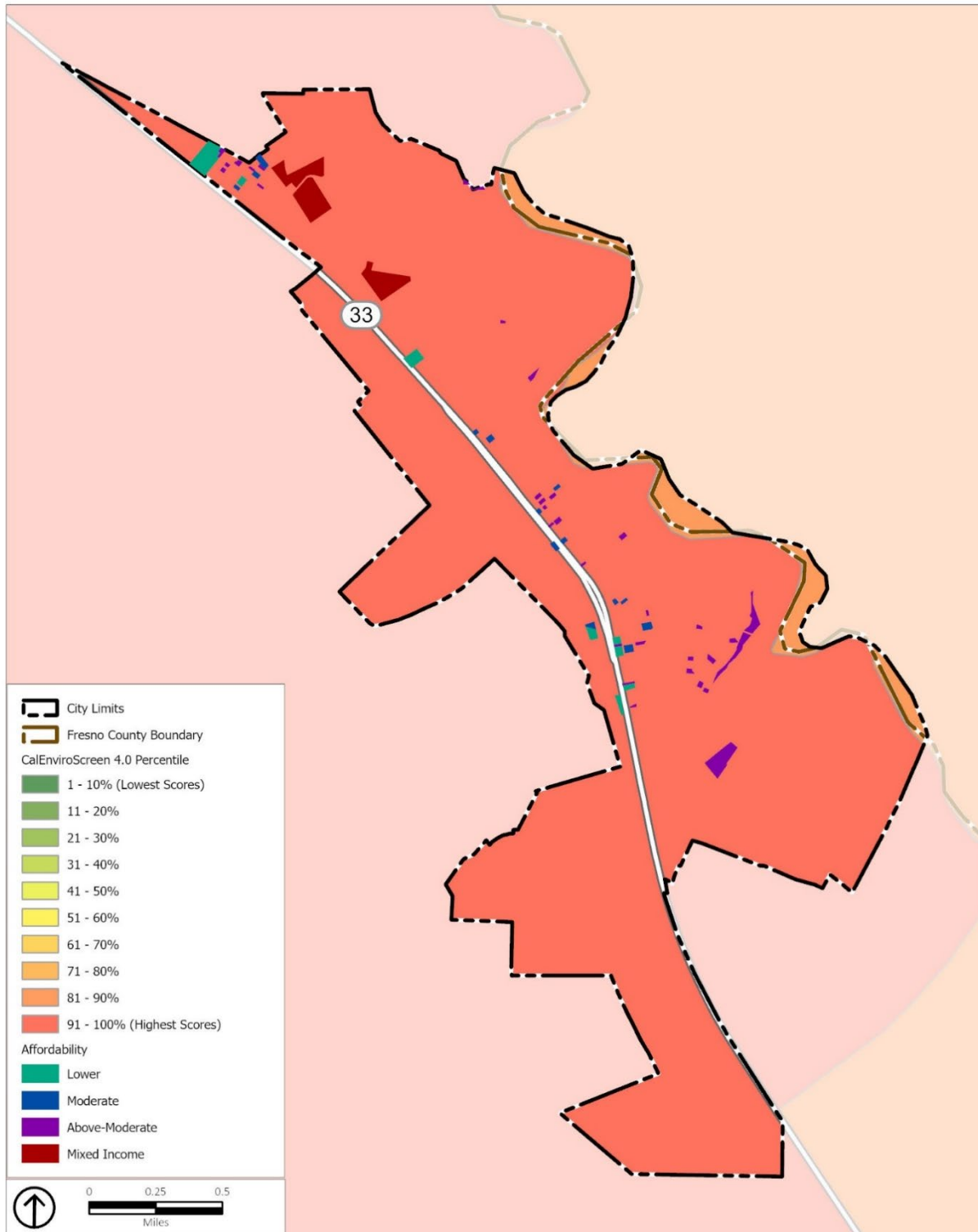
In Firebaugh, the primary indicators leading to the high scores as reported by OEHHA's CalEnviroScreen, are, in order of significance, pesticides, groundwater threats, ozone, and drinking water contaminants. Firebaugh is in a sparsely populated area, with few industrial uses and relatively low pollution from vehicular emissions. However, commercial agriculture occurring close to Firebaugh may contribute to adverse environmental conditions. The entirety of Firebaugh falls within the boundaries of an area considered to be a Senate Bill (SB) 535-qualifying disadvantaged community, representing the 25.0 percent of highest-scoring census tracts in CalEnviroScreen 4.0, census tracts previously identified in the top 25.0 percent in CalEnviroScreen 3.0, and census tracts with high amounts of pollution and low populations. This indicates that, as compared with statewide averages, Firebaugh represents an area of potential concern regarding fair housing and disproportionate exposure to environmental hazards and a concentration of vulnerable populations.

The FCHMP, adopted in August 2018, assessed the risk of several potential disasters, including dam and levee failure, flooding, earthquakes and liquefaction, climate change, landslides, wildfire, and more. The City of Firebaugh is downstream from the Mendota Diversion dam, which could cause flooding in the event of a failure. Additionally, the HMPC reported that due to Firebaugh's location on the San Joaquin River and the size of the Friant Dam impoundment on Millerton Lake, the City could also be impacted in the event of a failure of that structure. The highest risk disasters for Firebaugh were deemed to be agricultural hazards, flood/levee failure, draught, and hazardous materials incident, all of which are considered to be highly likely to occur in the future.

The Federal Emergency Management Agency (FEMA) develops flood maps that identify areas with the highest risk of flooding, differentiating them by the degree of severity and frequency of flooding anticipated. In Firebaugh, most of the city has been identified as Zone AE, which covers those areas with a 1.0 percent annual chance of flooding, or as having a 0.2 percent annual chance of flooding, due to its location on the San Joaquin River (**Figure 1C-12, Flood Hazard Zones**). The only areas not identified as having an increased risk of flooding are downtown, along N Street, and west of Clyde Fannon Road.

Through **Program 18** the City will investigate the availability of additional funds and programs to mitigate risks related to flooding, dam inundation, and landslides. The City will also support home weatherization programs as part of **Program 28**.

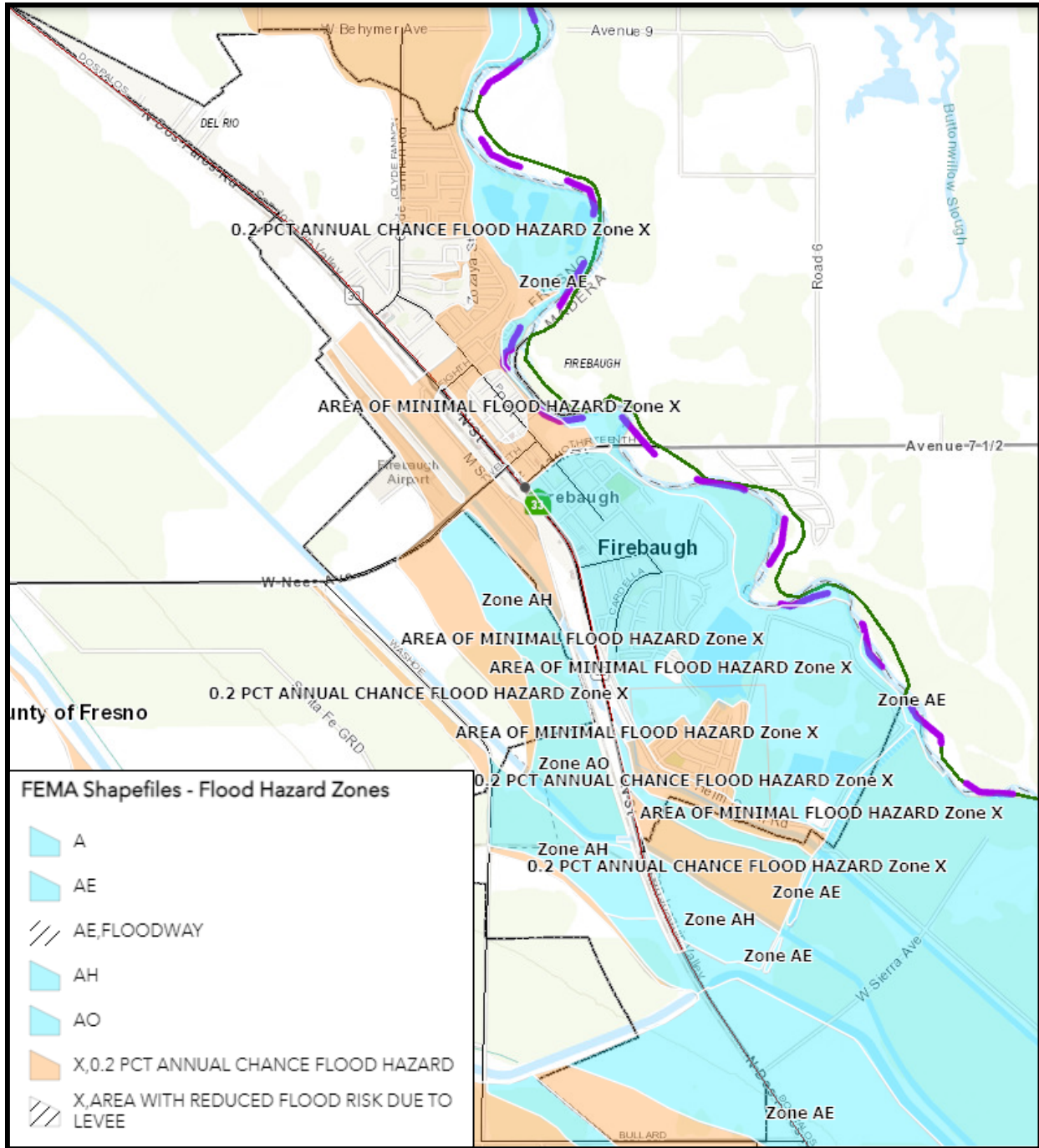
FIGURE 1C-11 CALENVIROSCREEN SCORES



Source: CalEnviroScreen 4.0; City of Firebaugh, 2023; Placeworks, 2023

Source: OEHHA, 2021

FIGURE 1C-12 FLOOD HAZARD ZONES



Source: FEMA 2021; Fresno County, 2021; accessed November 2022

Disproportionate Housing Need and Displacement Risk

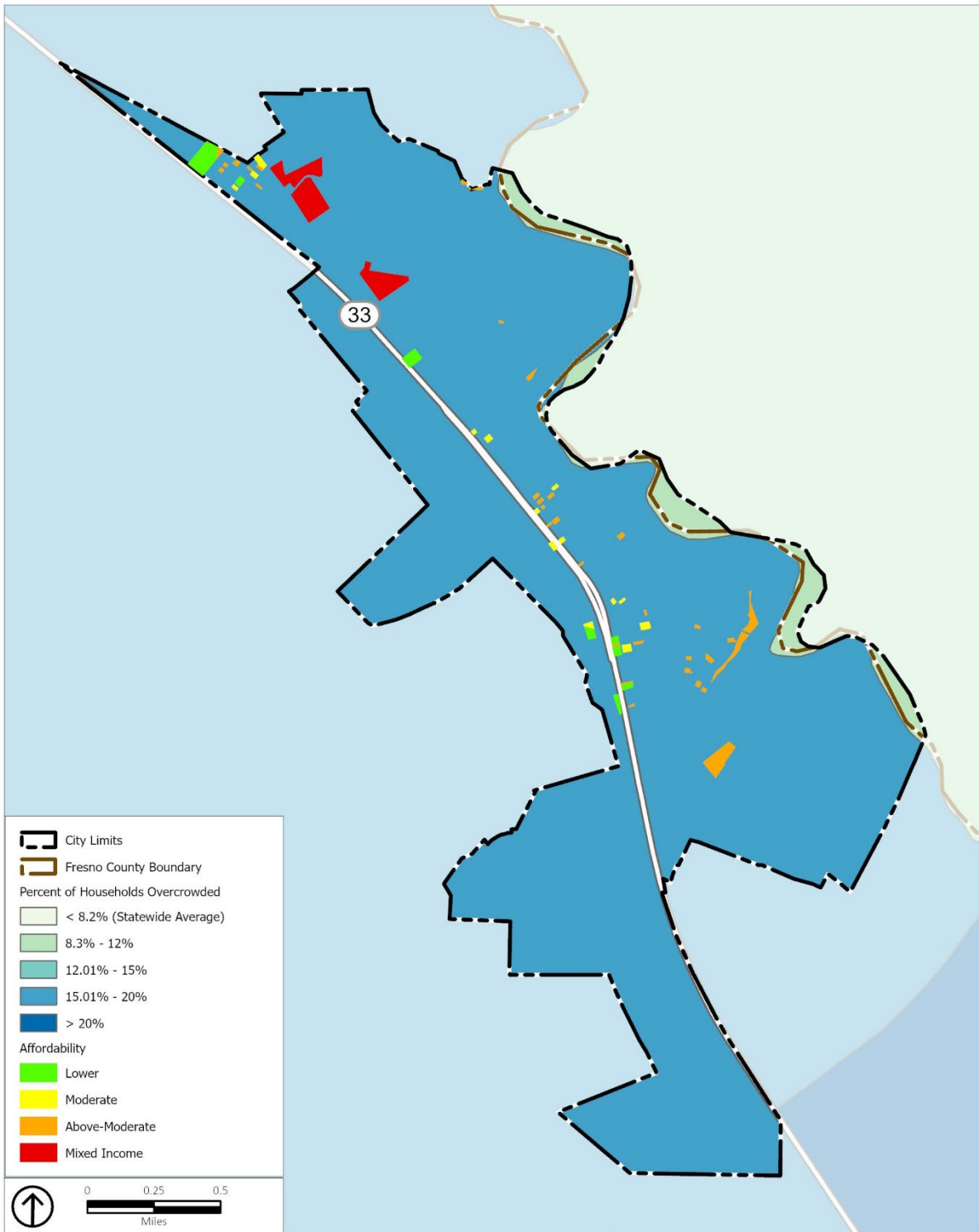
Overcrowding

Overall, approximately 9.4 percent of households in Firebaugh are considered overcrowded, or approximately one and a half times the proportion of overcrowding in Fresno County as a whole (6.1 percent). Further, 4.9 percent of Firebaugh households are considered severely overcrowded, which is also higher than the 3.6 percent of households in Fresno County. While overcrowding is relatively similar between renter and homeowner households in Firebaugh, with 10.5 percent of renters and 8.2 percent of homeowners experiencing overcrowding, the severe overcrowding is only felt by renters. Approximately 9.3 percent of renter households in Firebaugh are severely overcrowded, indicating a possible shortage of large rental units, with multiple bedrooms, or high rental housing costs, forcing occupants to rent smaller units than are needed, or share spaces with other households or family members.

As Firebaugh is made up of a single census tract, it is not possible to identify geographic patterns of overcrowding (**Figure 1C-13, Overcrowding in Firebaugh**). Given the high rates of overcrowding, particularly among renters, it is likely that residents experiencing overcrowding are located throughout the city. However, Firebaugh does have the second-highest rate of severe overcrowding among renters in Fresno County, behind Mendota, indicating a significantly high need for housing options that combat overcrowding.

Despite the high rates of overcrowding in 2020, they have decreased since 2010. In 2010, 12.9 percent of all households in Firebaugh were overcrowded, compared to 9.4 percent in 2020. In contrast, the rate of severe overcrowding has increased from 2.3 percent in 2010 to 4.9 percent in 2020. The decrease in overcrowding has benefited renters exclusively, with renter overcrowding decreasing from 25.0 percent to 10.5 percent of renters, while homeowner overcrowding has increased from 2.5 percent to 8.2 percent. In contrast, renter households have also been exclusively impacted by the increase in severe overcrowding, increasing from 1.0 percent of renters in 2010 to 9.3 percent in 2020, while homeowner severe overcrowding decreased from 3.9 percent to 0.0 percent. The transition from overcrowding to severe overcrowding among renters may indicate that affordable, suitably sized housing units have become harder to secure, either due to availability, cost, or both.

FIGURE 1C-13 OVERCROWDING IN FIREBAUGH



Source: U.S. Department of Housing and Urban Development, 2020; City of Firebaugh, 2023; Placeworks, 2023

Overpayment

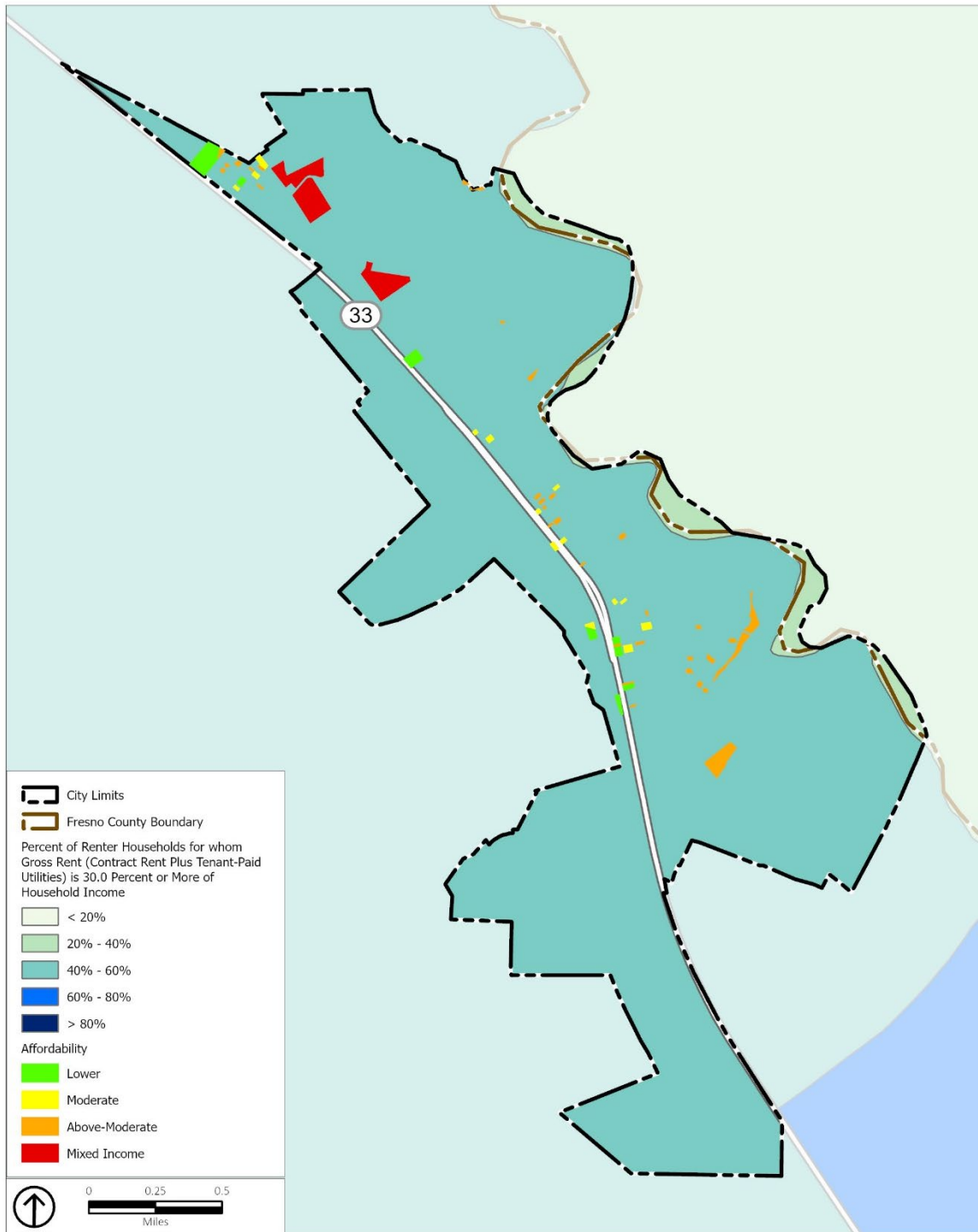
In Firebaugh, 24.4 percent of households are cost burdened (spending 30 percent or more of their income on housing costs), and 12.4 percent are severely cost-burdened (spending 50 percent or more of their income on housing costs), for a total of 36.8 percent of all households (**Table 1C-9, Cost Burden in Firebaugh, 2010-2018**). Of these households, approximately 53.2 percent are renters. In total, 34.2 percent of renters are cost burdened, and 18.1 percent are severely cost burdened, compared to 12.6 percent and 5.6 percent of homeowners, respectively. As discussed previously, Firebaugh consists of a single census tract, so geographic patterns of overpayment, or geographic comparisons between tenures, cannot be discerned (**Figure 1C-14, Percentage of Renters Overpaying**, and **Figure 1C-15, Percentage of Homeowners Overpaying**). However, **Figure 1C-15, Percentage of Homeowners Overpaying**, shows that overpayment among this tenure is similar in Firebaugh compared to surrounding areas, including Dos Palos to the north and most of Madera to the east, and lower than Mendota to the south. In contrast, **Figure 1C-14, Percentage of Renters Overpaying**, demonstrates that overpayment in Firebaugh is higher than neighboring census tracts, though, as with homeowners, is similar to Dos Palos and Madera, and higher than most of Mendota.

TABLE 1C-9 COST BURDEN IN FIREBAUGH, 2010-2018

Household Type	Cost Burdened			Severely Cost Burdened		
	2010	2018	Percentage Change	2010	2018	Percentage Change
All Households	27.3%	24.4%	-2.9%	14.2%	12.4%	-1.8%
Renters	27.3%	34.2%	6.9%	14.8%	18.1%	3.3%
Homeowners	26.9%	12.6%	-14.3%	13.4%	5.6%	-7.8%
Lower-Income Households	33.3%	40.7%	7.4%	19.4%	22.2%	2.8%
Renters	31.1%	42.0%	10.9%	17.5%	22.3%	4.8%
Homeowners	36.9%	38.2%	1.3%	22.5%	20.0%	-2.5%
Moderate-Income Households	16.7%	4.0%	-12.7%	0.0%	0.0%	0.0%
Renters	11.8%	0.0%	-11.8%	0.0%	0.0%	0.0%
Homeowners	15.4%	5.4%	-10.0%	0.0%	0.0%	0.0%
Above Moderate-Income Households	9.2%	1.5%	-7.7%	0.0%	0.0%	0.0%
Renters	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Homeowners	11.5%	1.9%	-9.6%	0.0%	0.0%	0.0%

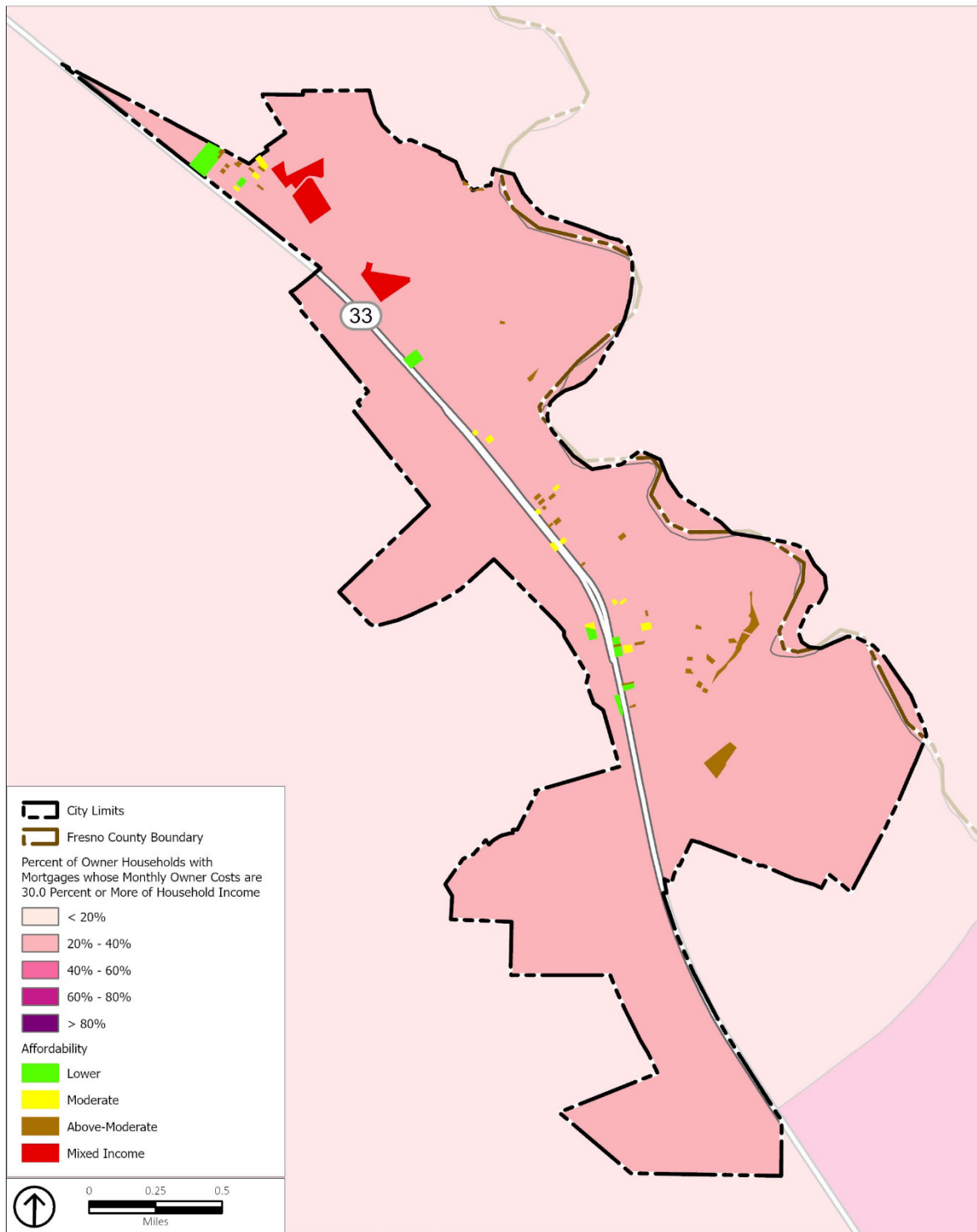
Sources: CHAS 2006-2010 and 2014-2018

FIGURE 1C-14 PERCENTAGE OF RENTERS OVERPAYING



Source: U.S. Census (American Communities Survey 2015-2019); City of Firebaugh, 2023; Placeworks, 2023

FIGURE 1C-15 PERCENTAGE OF HOMEOWNERS OVERPAYING



Source: U.S. Census (American Communities Survey 2015-2019); City of Firebaugh, 2023; Placeworks, 2023

As discussed in the Overpayment section of Section 2: Housing Needs Assessment, overpayment often impacts lower-income households at a higher rate due to financial constraints. As such, these households are most at risk of displacement due to overpayment resulting from more limited flexibility in responding to changes in income or rent. In Firebaugh, 40.7 percent of all lower-income households are cost burdened, and 22.2 percent are severely cost burdened, for a total of 62.9 percent of lower-income households experiencing some degree of cost burden (**Table 1C-9, Cost Burden in Firebaugh, 2010-2018**). Further, both lower-income homeowners and renters are impacted by housing costs at similar rates, with 64.3 percent of lower-income renters and 58.2 percent of homeowners experiencing some degree of cost burden. In contrast, only 4.0 percent of moderate-income households and 1.5 percent of above moderate-income households experience cost burden, and none experience severe cost burden.

Since 2010, overpayment rates have decreased for moderate- and above moderate-income households, across tenures, as seen in **Table 1C-9**. However, lower-income renters have experienced a 10.9 percentage point increase in severe overpayment and lower-income homeowners have experienced a 1.3 percentage point increase in overpayment, thus influencing the percentage change for all households. According to the ACS, the median home value in Firebaugh in 2010 was \$170,500. By 2020, this had increased to \$178,800, for an annual average increase of approximately 0.5 percent. While median gross rent data is not available from 2010, it decreased from \$679 in 2015 to \$655 in 2020, for an annual average decrease of 0.7 percent. Housing costs in Firebaugh have remained fairly stable over recent years, particularly when compared to elsewhere in Fresno County and the region. As such, it is assumed that housing costs do not increase displacement risk for residents of Firebaugh. However, overpayment is still present despite small increases in housing costs.

The City will coordinate with the Housing Authority in **Program 29** to continue the Housing Choice Voucher (HCV) program in Firebaugh and will disseminate information to landlords and property owners about the program. Through **Program 8** the City will pursue HOME funding which could be used to provide financial assistance to first-time homebuyers.

Substandard Housing Conditions

Approximately 45.2 percent of Firebaugh's housing units are over 30 years old, and just 13.8 percent are over 50 years old, suggesting that Firebaugh's housing stock is relatively new (Table 2-19, Age of Housing Stock [2020], in Section 2: Housing Needs Assessment). However, while less than half of the housing stock, older units are generally more frequently subject to maintenance issues than newer housing stock. Even units that are not urgently in need of repair may benefit from energy-efficiency improvements to reduce energy usage and related climate impacts. The City's oldest housing is largely concentrated in the center of the city between N Street and the San Joaquin River, and from 8th Street to 16th Street. In this area, homes were generally built between the 1930s and 1950s, while in other neighborhoods, the homes are typically newer, larger units. However, as nearly all of Firebaugh is considered low resource by TCAC, and the median income is at or below the state median, households throughout the budget range may not have the financial capacity to complete needed repairs on aging homes.

Another measure of substandard housing conditions is the presence of kitchen and plumbing facilities. However, the 2015-2019 ACS estimated that there are no units, either owner- or renter-occupied, that are lacking a complete kitchen or plumbing that are indicators of habitability and condition.

Through **Program 26** the City will continue to use code enforcement and abatement processes to bring substandard housing units and residential properties into compliance with City codes, and will provide information about rehabilitation assistance programs. The City will pursue CDBG funds to provide rehabilitation assistance funding as part of **Program 9** and will include weatherization improvements in these projects as part of **Program 28**.

Homelessness

In January 2022, the Fresno-Madera Continuum of Care (FMCoC) published its Homeless Census and Survey Report (Point-in-Time [PIT]) count, which estimated 3,938 persons experiencing homelessness in Fresno County. Of that number, 1,728 persons were sheltered homeless and 2,210 were unsheltered homeless (Table 2-35, Total Unsheltered and Sheltered Homeless Count: Fresno County [2022] in Section 2: Housing Needs Assessment). Of this population, 3,397 individuals were counted in the City of Fresno and the remaining 541 were in the remainder of the county.

Throughout the FMCoC area, which includes Madera County, approximately 60.0 percent of the homeless population identified as male, 29.0 percent as female, and 1.0 percent as transgender. Approximately half of the population identified as Hispanic, 6.0 percent identified as Native American or Alaska Native, 3.7 percent as Asian, 15.6 percent as Black or African American, 0.8 percent as Native Hawaiian or Pacific Islander, 60.6 percent as White, and 12.8 percent as multi-racial or belonging to another race. Additionally, 205 people, or 4.9 percent of the homeless population, were veterans, 15.0 percent were survivors of domestic violence, and 19.0 percent had a serious mental illness. While the age of homeless persons was reported generally, it did not identify the senior population. The PIT report does not distinguish the characteristics of the homeless population in Fresno County, so it is assumed that these statistics generally represent the Fresno County population. Further, the 2022 PIT does not identify the locations of those individuals in the remainder of the county. However, in 2021, the County of Fresno released a Homelessness Update that identified 3 homeless persons in the City of Firebaugh, approximately 1.5 percent of the homeless population in the “rural informal county,” which includes the cities of Coalinga, Firebaugh, Fowler, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, Sanger, and Selma, and the unincorporated communities of Raisin City and West Park.

Table 1C-10, Demographic Characteristics of Homeless Population, 2022, identifies the proportion of each of the protected characteristics identified in the 2022 PIT compared to the proportion of each Fresno County jurisdictions’ population, to identify whether any protected classes are disproportionately represented as part of the homeless population. The percentages for a protected characteristic population in **bold** are overrepresented in the homeless population compared to that jurisdiction’s total population. It is worth noting that, given the small size of the homeless population in Firebaugh, it is unlikely that all protected characteristics are represented. However, without data available at the jurisdiction level, it is assumed that the percentages of each protected class apply to the local homeless population.

TABLE 1C-10 DEMOGRAPHIC CHARACTERISTICS OF THE HOMELESS POPULATION, 2022

Jurisdiction	Veteran	Mental Disability	Hispanic	Native American/Alaska Native	Asian	Black/African American	Native Hawaiian/Pacific Islander	White	Other/Multiple Races
Total Homeless	4.9%	19.0%	50.0%	6.0%	3.7%	15.6%	0.8%	60.6%	12.8%
Clovis	7.0%	4.7%	32.7%	0.2%	10.7%	2.6%	0.2%	49.5%	4.0%
Coalinga	4.4%	5.1%	62.0%	2.0%	1.9%	2.9%	0.5%	28.2%	2.6%
Firebaugh	1.3%	2.2%	94.1%	0.0%	0.1%	0.0%	0.0%	5.8%	0.1%
Fowler	6.4%	3.9%	65.2%	0.3%	9.9%	0.4%	0.0%	19.8%	4.4%
Fresno	5.1%	6.3%	49.7%	0.5%	14.0%	6.9%	0.1%	26.1%	2.7%
Huron	1.1%	1.8%	94.5%	1.8%	0.0%	0.3%	0.0%	3.4%	0.0%
Kerman	3.9%	5.7%	81.7%	0.0%	4.4%	0.3%	0.0%	12.0%	1.4%
Kingsburg	7.0%	4.0%	47.7%	0.0%	7.9%	0.3%	0.0%	41.0%	2.7%
Mendota	0.5%	2.2%	96.0%	0.1%	0.0%	0.0%	0.0%	3.6%	0.3%
Orange Cove	7.0%	2.6%	95.3%	0.0%	0.0%	1.2%	0.3%	3.0%	0.1%
Parlier	1.1%	2.4%	97.7%	0.0%	0.2%	0.0%	0.0%	1.8%	0.2%
Reedley	4.1%	4.0%	79.3%	0.2%	2.3%	1.5%	0.1%	14.2%	2.4%
Sanger	3.6%	3.6%	80.5%	0.5%	3.0%	0.0%	0.3%	15.0%	0.7%
San Joaquin	0.8%	1.5%	97.5%	0.0%	0.0%	1.0%	0.0%	1.5%	0.0%
Selma	3.6%	3.5%	85.0%	0.1%	1.8%	0.9%	0.0%	10.7%	1.6%
Unincorporated County	5.7%	4.8%	47.7%	0.6%	7.5%	2.0%	0.1%	39.6%	2.5%

Sources: FCOG Data Packet, 2022; Fresno/Madera Continuum of Care, 2022; 2016-2020 ACS

As seen in **Table 1C-10, Demographic Characteristics of Homeless Population, 2022**, all protected characteristics are overrepresented in the majority of Fresno County jurisdictions, with individuals with mental disabilities and residents that identify as Native American, Alaska Native, Black, African American, Native Hawaiian, Pacific Islander, White, or Other/Multiple Races being overrepresented in all Fresno County jurisdictions. Homelessness is often a cross-jurisdictional issue; therefore, the City participates in, and offers, several homelessness resources and programs that are available regionally, identified in **Table 1C-11, Services to Address Homelessness**.

TABLE 1C-11 SERVICES TO ADDRESS HOMELESSNESS

Service/Resource	Description	Operator	Location
Multi-Agency Access Program (MAP Point)	Traveling food truck and fixed locations that provide linkage to government resources and services (housing, behavioral health, physical health, food linkages, and transportation) at no cost to all residents of Fresno County	Fresno County Department of Behavioral Health (funding)/ Kings View Corporation (operation)	Countywide Physical locations: Firebaugh, Fowler, Fresno, Huron, Kerman, Mendota, Parlier, and Reedley
Fresno County Behavioral Health WARM Line	Available during weekday business hours for non-emergency emotional and coping support for residents throughout the county	Fresno County Department of Behavioral Health	Countywide
Multi-Agency Response to Community Homelessness (MARCH)	Countywide collaboration to address homelessness through coordination of resources regionally and cross-jurisdictionally, engagement of the community, attracting private funding to support community-specific programs, and inclusion of rural representatives selected by FCOG	FCOG/Jurisdictions	Countywide
Turning Point of Central California	Mental health services including a full-service partnership program	Contracted by Fresno County Department of Behavioral Health	Countywide
Fresno County Department of Social Services Homeless Assistance	Temporary housing, permanent housing, or arrears payments for families eligible for CalWorks once during a 12-month period	Fresno County Department of Social Services	Countywide
Catholic Charities	Clothing, shelter, diapers, a food pantry, rent and mortgage assistance, DMV ID vouchers, application assistance for CalFresh and food stamps, application assistance for PG&E discounts, assistance with immigration services, and senior companionship assistance. Also has a Rural Outreach Program to serve residents throughout the region and work with migrant farmworkers.	Catholic Charities	Countywide Physical location: City of Fresno

Service/Resource	Description	Operator	Location
Emergency Housing Voucher	Assist persons experiencing, at-risk of becoming, or recently homeless and those fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking	Fresno Housing and FMCoC	Countywide
United Way	Emergency informational services to connect persons in need with Homeless Prevention Programs, food and shelter assistance, help with landlord-tenant issues, legal services referrals, and more	United Way	Countywide
Groceries2Go	Provides grocery boxes of shelf-stable food items through an appointment-based system.	Central California Food Bank	Countywide
CalFresh Enrollment Assistance	Application assistance and assistance navigating the CalFresh process.	Central California Food Bank	Countywide
Fresh Produce Distribution	Mobile Pantry Program and Neighborhood Markets operating out of self-contained vehicles that travel to rural and remote areas throughout the county. A schedule of distribution locations is available online.	Central California Food Bank	Countywide
Senior Hunger Program	Food boxes to senior-serving partners tailored to the dietary needs of seniors.	Central California Food Bank	Countywide
Partner Feeding Sites	Provides food to over 220 sites including churches, community centers, and other organizations to feed hungry residents in local neighborhoods	Central California Food Bank	Countywide
USDA Partnership	Distribute food acquired by the USDA to 47 organizations in Fresno County.	Central California Food Bank	Countywide
Fresno County Food Map	Online service mapping locations of feeding sites, food banks, etc.	Fresno County	Countywide
Projects for Assistance in Transition from Homelessness (PATH)	Street outreach for people experiencing or at risk of homelessness and referrals to housing resources, medical care, mental health counseling, and social services.	Fresno County Department of Behavioral Health (funding)/ Kings View Corporation (operation)	Countywide

Emergency shelters also include Marjaree Mason Center, Fresno Rescue Mission, Evangel Home Inc., and Plaza Terrace.

Through **Program 3** the City will address ongoing homelessness issues by cooperating with neighboring cities, the County, and other agencies in the development of programs aimed at providing homeless shelters and related services. As part of the zoning code amendments that will be made through **Program 20**, the City will permit low-barrier navigation standards and permit transitional and supportive housing in a manner that complies with State law.

Farmworkers

As discussed in the Regional Assessment of Fair Housing, farmworkers are considered a special needs group because they traditionally earn low wages and often migrate between farms, resulting in many farmworkers living in overcrowded and substandard housing conditions. Although Fresno County’s overall economy has historically been largely based on agricultural operations, the number of farmworkers living in each of the jurisdictions in the county in more recent years varies depending on location, size, and diversification of their individual economic base. Further, prior to the COVID-19 pandemic, the industry started shifting toward recruiting and employing H-2A visa workers, many of whom are from Mexico and Central America. However, farmworkers are essential to Fresno County’s and Firebaugh’s economies as well as to local and national food supplies, and their needs for safe and affordable housing resources must be addressed.

The 2017 Census of Agriculture identifies 106 farm operations within the 93622 zip code, which includes Firebaugh. However, this zip code includes land in unincorporated Fresno County to the north and south of Firebaugh, as well as land within Madera and Merced counties to the north. There are also 136 farm operations in the 93620 zip code in Merced County north of Firebaugh. It is likely that some portion of the farm operations in these zip codes, particularly in the areas closest to Firebaugh, employ farmworkers that reside or use resources in the city.

According to the 2016-2020 ACS, 40.7 percent of Firebaugh’s labor force is employed in agriculture, forestry, fishing and hunting, and mining, lower than the cities of Huron, Mendota, San Joaquin, and Orange Cove, yet above most jurisdictions in the eastern portion of Fresno County (see Table 2-39, Estimated Farmworkers 2020, in the HNA). Although other jurisdictions with lower proportions of employees in these occupations may have larger numbers of farm laborers, the concentration of persons employed as farmworkers in Firebaugh is significant. While it is possible that not all these workers are engaged in farm labor, the data allow comparisons between jurisdictions and to gauge segments of the population at risk of overpayment, overcrowding, substandard housing conditions, or displacement.

Based on the most recent (2022) farmworker employment figures collected by the California Employment Development Department (EDD), there are 96,300 farmworkers employed throughout the county, yet farmworker housing facilities for only 2,540 occupants were contracted by H2-A employers and farm operators according to the HCD Employee Housing Facilities Permit Services database. Although this is equivalent to only about 2.6 percent of farmworker employment countywide, it is important because H2-A workers must be provided with housing accommodations. The seasonal and often migrant nature of farm labor, and accounting for undocumented workers, suggest that this data may underrepresent the actual farmworker population, because undocumented residents do not often participate in traditional data collection.

The COVID Farmworker Survey, Phase 1 Report, by the California Institute for Rural Studies, published in February 2021, estimates that undocumented workers comprise approximately 50 percent of workers statewide. They are predominantly Mexican, and the majority are Mixteco and Trique, indigenous non-Spanish-speaking people. According to the article “In the Valley of Fear,” published in December 2018 on workingimmigrants.com,

most of the farmworkers in the San Joaquin Valley have been working the fields for at least a decade and have established families in the vicinity of their workplace.

Between September 2021 and January 2022, Fresno County conducted a Farmworker Survey and a Farmworker Employer Survey. A second round of each survey was conducted between February 2022 and July 2022. In total, the County surveyed 240 farmworkers and 170 farm employers. Only one respondent to the Fresno County Farmworkers Survey reported residing in Firebaugh, on a H-2A visa. Countywide, 37.0 percent of the respondents reported being citizens, 38.2 percent reported being permanent residents, 16.0 percent identified their status as undocumented workers, 6.3 percent did not respond, and 1.3 percent had H-2A visa status. Due to the small representation of respondents residing in or near Firebaugh, a definitive determination of the proportion of undocumented workers cannot be made; therefore, the representation of undocumented workers throughout Fresno County as reported by the farmworkers survey may be applicable to the farmworker population in Firebaugh and surrounding communities.

According to the EDD, the most recent data from 2014 measured median wage for farmworkers at \$13.44 per hour or approximately \$25,804 per year for full-time work, which is considered extremely low income, correlating with the 2019 poverty threshold of \$25,750. Seasonal workers without a year-round income could have lower incomes. The median income in Firebaugh is \$36,411, and 30.3 percent of the population lives below the poverty threshold. While 92.5 percent of the households in the city are Hispanic, 91.4 percent of the total households in poverty in the city are Hispanic households. The findings from the Fresno County Farmworker Survey indicate that 99.6 percent of farmworkers surveyed countywide are Hispanic. When the ACS 2016-2020 data that 40.7 percent of the labor force in Firebaugh is employed in agriculture is combined with the above poverty and EDD wage data, it suggests that a majority of the labor force employed in agricultural industries are Hispanic (see HNA Table 2 10, Employment by Industry), and it is likely that many of these workers have incomes below the poverty threshold.

To meet the housing needs of the farmworker population in Firebaugh, as shown by **Table 1C-12, Farmworker Housing Facilities in Firebaugh**, the HCD Employee Housing Facilities Permit Services database identifies 50 units of employer-provided farm housing with total capacity for 139 workers in Firebaugh. However, though these units are listed as being in Firebaugh, 25 units are not physically within the city boundaries, but in the 93622 zip code. An additional 535 units are provided for H-2A workers as a requirement of the H-2A visa contracts. According to the 2021 TCAC/HCD mapping, these facilities are all in low resource areas, limiting access to resources and amenities while contributing to the concentration of lower income households and populations of color.

TABLE 1C-12 FARMWORKER HOUSING RESOURCES IN FIREBAUGH

Name of Facility	Location	# of Rooms	Maximum Occupancy
On-Site Farmworker Housing Facilities			
Growers Co.			
Maldonado Plaza	1779 Thomas Conboy Ave-Firebaugh	25	100
Vaquero Farms, Inc.	431 North Fairfax-Unincorporated County	5	5
Panoche Water District	52027 W. Althea-Unincorporated County	5	5
Davis Farms	7300, 7320, 7352 Jerrold Avenue and 29478,39500, 39544, 39550 West Bullard Ave.- Unincorporated County	7	21
J & J Farms	36245 W. Ashlan – Unincorporated County	8	8
Subtotal		50	139
H-2A Visa Farmworker Housing Facilities			
Motel 33	445 N. Street - Firebaugh	27	81
Peri & Sons			
Maldonado Plaza	1779 Thomas Conboy Ave-	39	236
Peri & Sons Farms	4885 W. Nees Ave	42	84
Ranch Nuevo	Same – Unincorporated County	48	96
Best Western Apricot Inn	46290 West Panoche Rd – Unincorporated County	19	38
Subtotal		175	535
Total		225	674

Source: HCD Employee Housing Facilities Permit Services database, January 2023.

Note: Facilities reported in operation as of 12/31/2022.

Overall, farmworker housing is available for 674 farmworkers in the Firebaugh area, resulting in a shortfall of units for almost 400 farmworkers, and likely their families, counted in the 2016-2020 ACS. Given the shortage of farmworker housing, many farmworkers are likely forced to pay market rate for housing or find other options, such as sleeping in vehicles or garages. In addition, with the exception of Maldonado Plaza, the majority of farm labor housing is dormitory or hotel room style and generally not suitable for families. Farmworkers that are citizens and permanent residents may have access to the additional 340 affordable multifamily housing opportunities in Firebaugh, but they must compete with other lower-income households for the limited number of units. For undocumented workers, options are more limited, and a large number of farmworkers, even permanent residents, may live in spaces not intended for habitation, such as shacks, outbuildings and sheds, and converted garages, often in severely overcrowded conditions.

Permanent resident farmworker households are included in ACS estimates and therefore part of CHAS housing need estimates. Consequently, the housing needs of lower-income farmworkers are not differentiated from other lower-income households experiencing overpayment, overcrowding, and substandard housing. With more than one-third of the labor force in Firebaugh reported to be employed in agricultural-related operations, farmworkers

may comprise a large proportion of extremely low- and very low-income households experiencing one or more of these housing problems. Based on the Fresno County Farmworker Survey, 81.7 percent of respondents from throughout the county reported incomes below \$2,500 per month, which corresponds to an extremely low-income household of four. The one respondent of the Fresno County Farmworker Survey from Firebaugh had an income below \$2,500 per month; it is likely that farmworkers earn similar wages countywide and those local to Firebaugh would have similar challenges securing affordable housing.

Based on socioeconomic and demographic characteristics of the farmworker population in Fresno County, it is likely that many farmworkers in Firebaugh reside in the older neighborhoods with a median income of \$28,147 and 27.9 percent poverty rate, including the area north of 15th Street, south of Cline Street, and east of N Street (SR 33), and in the neighborhood that includes Maldonado Plaza and Motel 33.

Citizens, noncitizens with permanent status and H-2A visa workers are eligible for public housing, HCVs, USDA rural rental assistance, and Section 8 project based rental assistance. Section 214 of the Housing and Community Development Act of 1980, as amended, makes certain categories of noncitizens eligible for assistance, including most categories of immigrants, but excludes unauthorized immigrants (e.g., undocumented) and those in temporary status (e.g., tourists and students). Section 214 applies to specific programs—primarily federal rental assistance programs administered by HUD and the USDA—including Public Housing, Housing Choice Voucher, Section 8 project-based rental assistance programs, and rural rental assistance. Undocumented residents are subject to eligibility requirements based on whether Section 214-covered programs are administered by HUD or USDA, which implement different regulatory treatment for mixed-status households based on householder status. For HUD Section 214 projects, an ineligible noncitizen may reside with family members who are eligible to qualify for affordable housing (such as an undocumented single-parent with U.S. citizen children or an undocumented worker married to an eligible householder), although Section 8 benefits are prorated depending on the number of undocumented household members. For USDA Section 214 projects, an undocumented householder would not be eligible to participate in the Housing Choice Voucher program, and therefore would not qualify to live in any of the USDA-assisted affordable multifamily housing complexes (Firebaugh Garden and Maldonado Plaza Farmworkers Apartments), yet a family with an eligible householder that includes undocumented household members (such as a U.S. citizen householder married to an undocumented worker) would qualify to reside in these properties and receive full HCV assistance benefits. This population of assistance-ineligible householders is at higher risk of overpayment, overcrowding, and displacement, compounded by the legal complexities of eligibility and language barriers.

Similar to most jurisdictions in Fresno County, the majority of the residential opportunities in Firebaugh are single-family units, which comprise 61.5 percent of the housing stock. However, 40.7 percent of multifamily units and 58.4 percent of duplex units in the city are deed restricted or subsidized as affordable units. Firebaugh also has a high proportion of mobile homes (5.3 percent of the housing stock), which are naturally more affordable than single-family residential units and may serve as a valuable housing resource for workers unable to qualify for market rate or affordable rental housing, or other accommodations. Further, 1.4 percent of the dwellings in the city are RVs, vans, or portable trailers. The previous housing conditions analysis indicates that the homes in the lowest income, central neighborhoods of Firebaugh have smaller, older units interspersed with nonresidential uses, many of which appear to require maintenance or rehabilitation.

The high renter rate in single-family neighborhoods may support the findings of the Farmworker Survey, where respondents countywide indicated their preference for single-family units regardless of owner or renter status. According to the Fresno County Farmworkers Survey, 95.6 percent of renters responded that they desired to be homeowners. Further, 78.4 percent of the farmworker renter households consisted of three or more persons, of which 93.6 percent had resided in the U.S. for 10 or more years, 3.7 percent less than 10 years, and 2.7 did not respond. The prevalence of households with three or more persons, coupled with the longevity in the U.S. of the majority of the renters and the preference for single family unit type further substantiate the need for housing to accommodate families. However, the lower proportion of owner-occupied housing units suggests that the cost of homeownership, with a median priced home over \$300,000, (see Table 2-22, Home Sales Recorded in 2021-22, in the HNA) is more than the majority of households in the city, including farmworkers, can pay based on the 2016-2020 ACS employment by industry count, and representational incomes reported in the Fresno County Farmworker Survey and EDD reporting.

The Farmworker Survey found that the average household size among farmworkers was 3.9 persons, similar to the average household size in Firebaugh (3.8 persons). In Firebaugh the average household size in the low resource and undetermined resource areas of the city range between 3.2 persons in the older central core area to 4.2 persons in the block group with affordable public housing, affordable multifamily complexes, and Maldonado Plaza. Homeowner households have a larger household size (3.6 persons per household) than renters (2.5 persons per household). In Firebaugh, 38.0 percent of rental units have three or more bedrooms, but 87.1 percent of single-family homes have three or more bedrooms, which can better accommodate large households without overcrowding and support the larger household size among homeowners.

The rate of overcrowding citywide is 15.3 percent, almost double the statewide average, suggesting that farmworker households and other large households may face challenges finding adequately sized units, resulting in households sharing a dwelling or multiple family members sharing rooms. Survey results indicated that 58.4 percent of the farmworkers on a countywide basis were living in overcrowded conditions, with renter households finding units large enough to accommodate household size more of a challenge. Based on this, it is likely that farmworker renter households would have difficulty finding appropriately sized affordable housing in Firebaugh.

In response to the observed need for continued support and housing resources for local farmworkers, the City has included **Program 12** to offer technical support in applications for funding construction of farmworker housing.

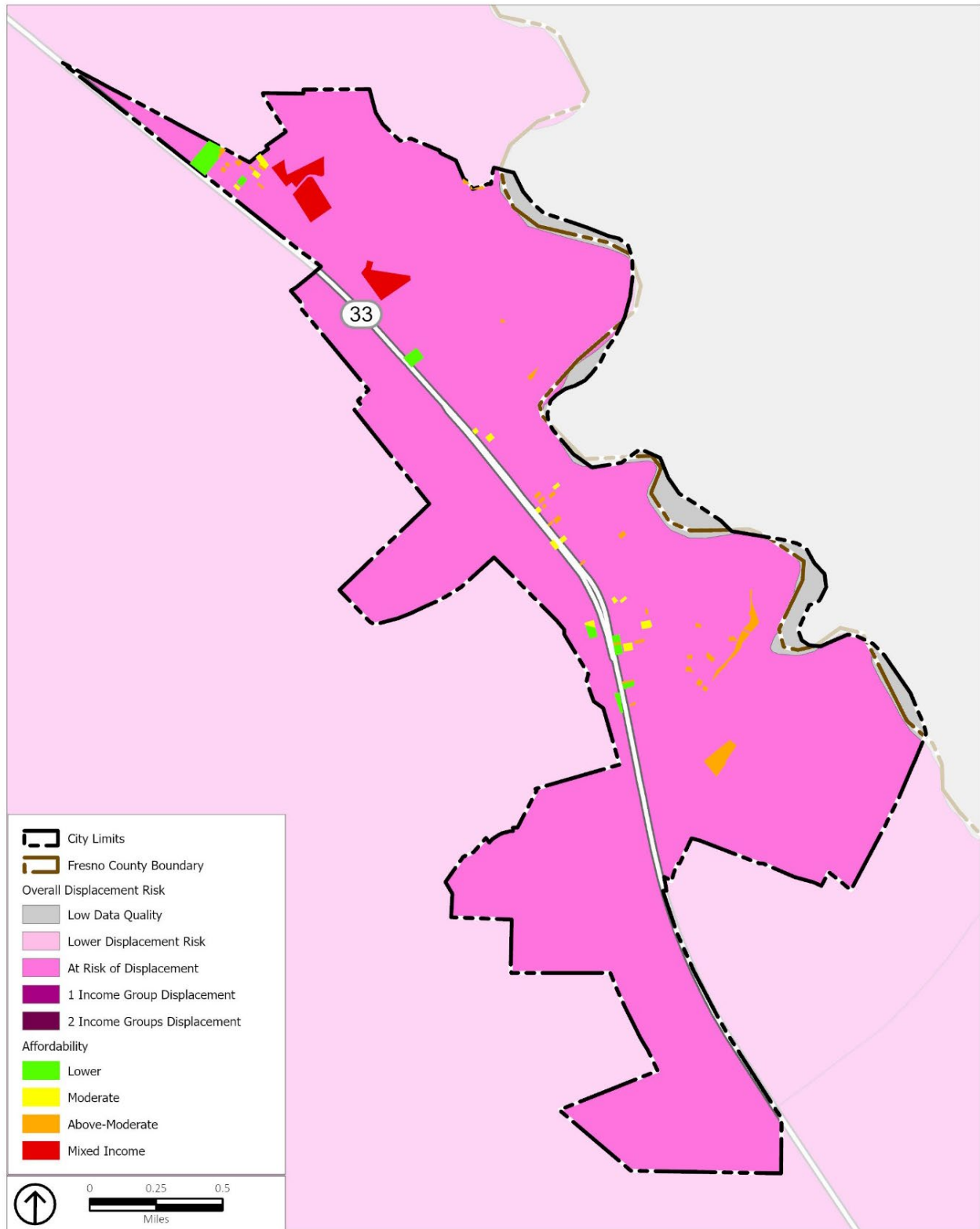
Displacement Risk

The Urban Displacement Project, a joint research and action initiative of the University of California, Berkeley, and the University of Toronto, analyzes income patterns and housing availability to determine the level of displacement risk at the census-tract level. Levels of displacement risk range from “probable displacement” to “extreme displacement,” with four total levels of displacement risk, if displacement risk is present. All of Firebaugh has been identified to have a “probable displacement” risk level, likely based on the concentration of lower-income households (**Figure 1C-16, Elevated Displacement Risk**). Although Firebaugh meets three of the conditions below, the Urban Displacement Project has not identified any areas within Firebaugh as “vulnerable” compared to elsewhere in the county (**Figure 1C-17, Vulnerable Communities Designation**). Vulnerability is defined as areas in which the share of very low-income residents is above 20.0 percent (21.1 percent in Firebaugh), and the tract meets at least two of the following criteria:

- Share of renters is above 40.0 percent,
- Share of people of color is above 50.0 percent,
- Share of very low-income households that are severely rent burdened households is above the county median, or
- They or areas in close proximity have been experiencing displacement pressures.

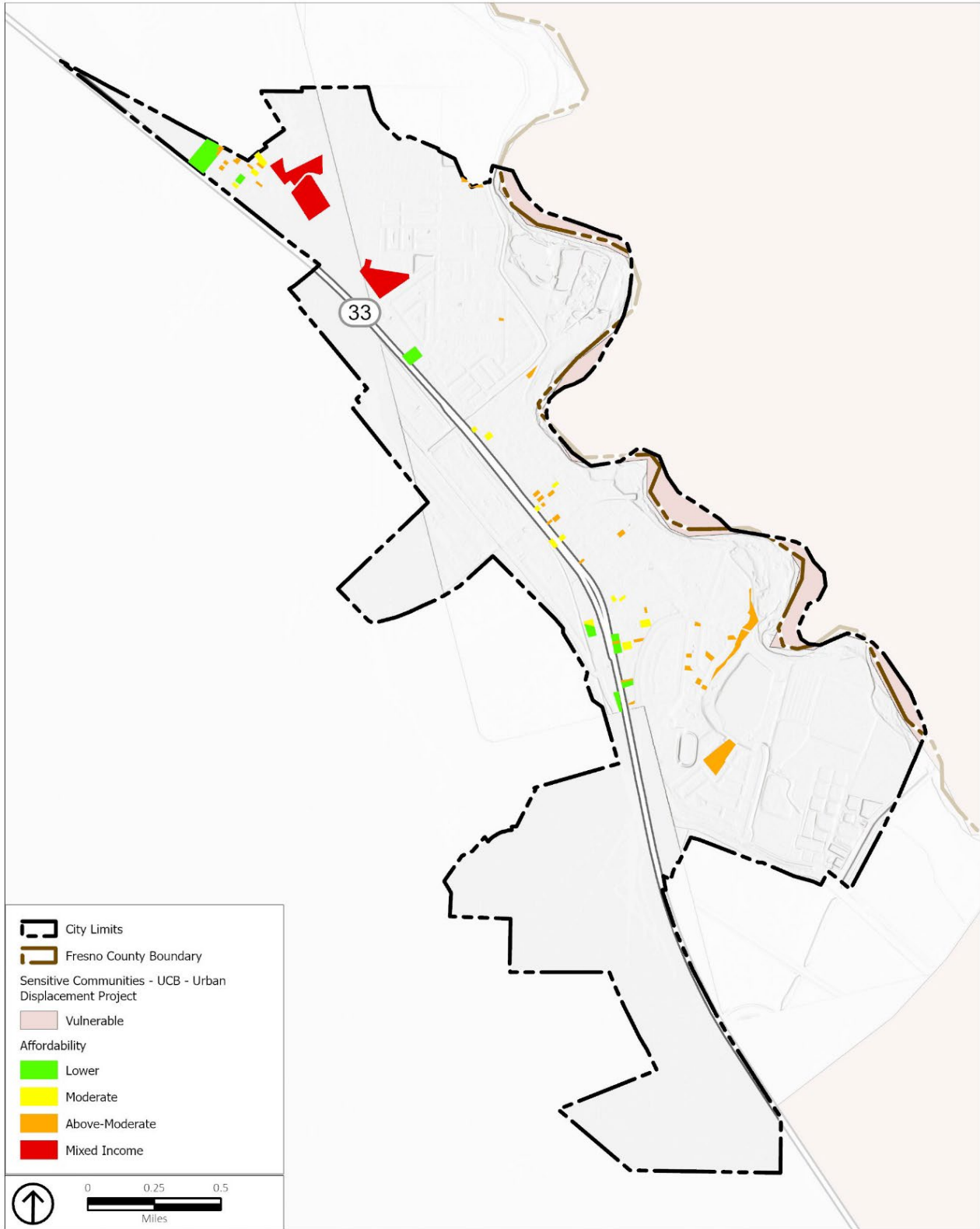
The Urban Displacement Project defines displacement pressures as a percentage change in rent greater than the county median for rent increases. The elevated displacement risk, but no vulnerability designation, is likely reflective of a combination of median incomes and housing costs. The ACS estimates that, since 2014, the median income in Firebaugh has increased by 2.7 percent. In contrast, as found in the analysis of overpayment, for-sale home costs have increased by an average of just 0.5 percent annually since 2014, and rental costs have increased by an average of just 0.7 percent annually since 2015. Firebaugh is the only community in Fresno County in which the increase in wages exceeds the increase in both home values and rents, suggesting that the community is not more vulnerable to displacement than any other community, proportionally. However, Firebaugh remains one of the lowest-income communities in the region, which poses a barrier to mobility for residents. In comparison, countywide, median incomes have increased by approximately 4.4 percent annually and rents have increased by 3.2 percent on average. While Zillow does not report countywide home values, the ACS estimates that these have increased by 3.9 percent annually, on average. This suggests that housing costs have remained relatively stable in Firebaugh compared to the region.

FIGURE 1C-16 ELEVATED DISPLACEMENT RISK



Source: U.S. Census; City of Firebaugh, 2023; Placeworks, 2023

FIGURE 1C-17 VULNERABLE COMMUNITIES DESIGNATION



Source: UC Berkeley Urban Displacement Project; City of Firebaugh, 2023; Placeworks, 2023

Other Relevant Factors

In addition to the indicators analyzed previously, there are several other factors that can influence housing mobility and access to opportunity in a jurisdiction. For example, historical development patterns may have resulted in neighborhoods that are largely or exclusively made up of single-family homes, or historical discrimination may have influenced a city's racial and ethnic composition. Further, given current market trends, newer market-rate neighborhoods may not be financially accessible to lower-income households without overpayment or overcrowding. Other factors may include public and private investment, local regulatory or economic development plans, and historical policies. Those factors that are considered relevant vary between jurisdictions and are described at the local level herein.

Land Use and Zoning Patterns

According to the 2016-2020 ACS, 61.5 percent of the housing stock in the City of Firebaugh is single-family units, inclusive of single-family attached units, indicating a smaller proportion of single-family units relative to other Fresno County jurisdictions. Duplex, triplex, and fourplex unit types make up approximately 21.4 percent of the City of Firebaugh's housing units. Conversely, only 10.5 percent of the housing stock consists of multifamily units in structures of five or more units, which is slightly lower than the rate of multifamily housing of this size in Coalinga, and slightly higher than the rate in Kerman. Mobile homes comprise 5.3 percent of the housing stock, with the majority of the units in the Firebaugh Hacienda Mobile Home Park. The remainder of the housing stock consists of boats, recreational vehicles (RVs), and other vehicles, at 1.4 percent.

While in most communities single-family zoning can create desirable places to live, higher entry costs associated with this housing type can pose a barrier to access for lower- and moderate-income households, restricting access to economic, educational, and other opportunities that are available in higher-resource communities. However, in the City of Firebaugh, the existing single-family residential areas are designated low resource by TCAC/HCD metrics. Although market values of homes in the City of Firebaugh are lower than in many of the other jurisdictions in Fresno County, and historically have provided opportunities for home ownership for lower-income households, in the current market, the average single-family home price has risen to over \$300,000 for smaller, older homes in the vicinity of the central commercial area (Table 2-22, Home Sales Recorded in 2021-22, in Section 2: Housing Needs Assessment). Based on data presented in Table 2-24, Fresno County Ability to Pay, 2022 in the Housing Needs Assessment, even the average home in the City of Firebaugh would likely cost more than most lower-income households' ability to pay. Given that 21.4 percent of the population has incomes below 50.0 percent of the AMI, the findings that 62.0 percent of lower-income households report overpaying for housing reflect the trends of rising home prices.

Affordable housing development typically requires high-density zones to support construction; therefore, zones limited to single dwelling units on each lot do not support affordable development. However, multifamily zones are scattered throughout the city rather than being concentrated in one area, with R-1 and R-2 designations directly adjacent to one another in the majority of older neighborhoods in the central portion of the city and in the vicinity of the community college. Additionally, redevelopment efforts in the central commercial core include the potential for mixed-use development with residential units and creative alley-facing dwelling unit configurations

As shown in **Figure 1C-18, Zoning in Firebaugh**, there are two zones for multifamily housing, R-2 and R-3. The R-2 low-density multifamily zones are primarily found adjacent to commercial zones in the central area of the city on the west side of SR 33 and adjacent to the Firebaugh Middle School and Mills School sites, in census tracts designated on TCAC/HCD Opportunity Area maps as low resource, while the central commercial area has no TCAC/HCD resource designation. The majority of high-density residential zoning is within the northern half of the city. North of Cline Street is a large R-3 site where the three affordable housing complexes, Firebaugh Garden, Mendota Village, and San Joaquin Vista Apartments, are located within a TCAC/HCD low-resource designation. R-2 and R-3 zones also surround Maldonado Park; the R-2 zoned neighborhood adjacent to the Maldonado Park has been developed with the Mendoza Terrace and Firebaugh Elderly City of Fresno Housing Authority public housing multiplexes, also within the TCAC/HCD low-resource designation. R-3 zones are primarily adjacent to SR 33 and along the Southern Pacific Railroad, interspersed with commercial and mobile home park zones, up to the northern border of the city, and a large R-2 neighborhood west of Clyde Fannon Road are TCAC/HCD-designated moderate resource, most likely due to proximity to SR 33 and commercial businesses and services.

While lower-density multifamily housing types and the majority of affordable housing complexes, which tend to be more affordable, are largely limited to low-resource areas of the city, the highest-density zones, and the majority of mobile home park designations are sited adjacent to major transportation routes and general commercial zones, yet have higher TCAC/HCD resource opportunity designations.

As part of **Program 10** the City will work with housing developers to expand affordable housing opportunities throughout the City through actions such as identifying funding opportunities, offering fee reductions and development impact fee deferrals for affordable and special-needs projects, promoting incentives and the State density bonus, and identifying candidate sites for new projects. The City will also incentivize mixed-use projects and residential uses in commercial zones as part of **Program 7**. The City will encourage and support the development of housing for Extremely Low-Income Households through **Program 13** of the Housing Element. The City will also encourage and facilitate the development of Accessory Dwelling Units through **Program 15**, which have the potential to be a naturally-occurring affordable housing option located in higher opportunity areas. Through **Program 4**, the City will provide for a variety of housing types by ensuring that adequate sites are available to meet the City's Regional Housing Needs Allocation (RHNA) of 443 units.

Historical Development Patterns

The San Joaquin River played a major role in the settling of the valley. Prior to the establishment of the railroad and associated building of bridges, the San Joaquin River was the major thoroughfare to upstream communities. Ferries were the only means for gold miners and settlers to cross the river heading to gold country in the northwest. In 1854, the City of Firebaugh was established by Andrew Firebaugh as a trading post and ferry crossing on the San Joaquin River. Today, Firebaugh is one of the oldest towns on the west side of SR 99. Originally named Firebaugh's Ferry, it also served as a station stop on the Butterfield Overland Stage Route. Firebaugh was also responsible for constructing a toll road between Pacheco Pass and Bell Station in Santa Clara County, which ran parallel to the present SR 33 (also merges with SR 152 which links SR 99 to Interstate 5) and

served as a major transportation route between the San Joaquin Valley and the Santa Clara Valley to the west.

Incorporated in 1914, Firebaugh has grown from a ferry crossing to a small agricultural city, although the city's economy relies primarily on the industrial and manufacturing aspect of agricultural production. While packaging and distribution facilities draw employees from surrounding communities, the city has not had adequate housing resources to support the employment base despite available vacant land. The City of Firebaugh does not have a recent history of exclusionary zoning or discriminatory policies. Currently, two development companies, Arroyo Seco in Santa Barbara, and Cen-Cal General Construction in Fresno, are beginning to construct houses in Firebaugh, while the City is working with potential developers to increase the supply of multifamily units. In 2019, an article in *The Business 30th Anniversary Journal*, entitled *Firebaugh: Overlooked Town has Big Things Coming Its Way*, written by Donald Promnitz, reported that many of the out-of-town employees working in Firebaugh are beginning to express intent to live in the city if housing mobility opportunities are available, suggesting a need for new housing.

Public Investment Patterns

Public and private investment typically includes construction, maintenance, and improvements to public facilities, including infrastructure, acquisition of land, and major equipment. Historically, investment in the City of Firebaugh has been prioritized based on need and available funding, which has prevented disinvestment in any particular area of the city. However, major infrastructure or facilities in need of improvement are identified for investment in the City's Annual Budget. Capital improvements are funded from a variety of sources that can each be used for specific purposes. These funds are allocated to improve roadways and other transportation infrastructure, complete Central Firebaugh Revitalization Plan improvements identified in the 2006 General Plan, and other projects, including:

- **Central Commercial Area Roadway Improvements.** The City will complete street paving on 14th Street, J Street, and 10th Street, beautification project on O Street from 14th to 10th Street, and alley paving in downtown to support intensification of commercial and residential uses recommended by the Central Firebaugh Revitalization Plan, promote place-based revitalization, and improve circulation and safety in older residential neighborhoods.
- **Dunkle Park Renovations.** The City will facilitate improvements to Dunkle Park playground and the basketball area to upgrade recreation amenities for residents and increase access to outdoor recreation and healthy spaces.
- **Highway 33 (SR 33) Improvement Projects.** The City has identified funding to pave Highway 33 from Morris Kyle Drive to Douglas Avenue and implement bridge repair and improvement projects on Highway 33. The goal of this project is to improve vehicular access to commercial services, recreation facilities, and employment opportunities in commercial and business areas, as well as upgrading access to neighborhoods within the city.
- **School Site Sidewalk Repairs.** To improve community safety and access to educational resources, the City will complete sidewalk repairs around the schools.

- **Infrastructure Installation for Industrial Project:** To provide a shovel-ready site to increase employment opportunities for residents, the City will install water, sewer, and storm drainage infrastructure to 40 acres of industrially zoned land near Tomatek at the intersection of Highway 33 and Bullard.
- **Habitat for Humanity Affordable Housing.** To increase the supply of affordable housing choices, the City facilitated the transfer of property deed for affordable San Joaquin Vista Apartments at 500 P Street, in proximity to services and amenities, with access to West Hills College Firebaugh.
- **West Hills College Firebaugh Center.** The West Hills Community College District completed a new, three-acre campus in downtown Firebaugh, following an allocation of \$44 million in state funds for the project in 2021. The goal of the project was to improve access to educational opportunities for students by replacing the original building and improving the site with amenities, new roadways, and landscaping.
- **Veterans of Foreign Wars (VFW) Hall Completion.** The City completed construction of a new VFW hall for community events on the corner of P Street and 13th Street in June 2021. The goal of the project was to replace the outdated structure and further contribute to place-based revitalization of the downtown, while providing residents increased access to amenities.
- **Police and Fire Station Upgrading.** The City is completing new police and fire stations in Courthouse Park. These projects will move both departments from older, outdated buildings to larger structures (in the case of the Fire Department a new building).

Priority is based on projects that will result in the greatest community benefit, mitigate existing issues, and address public demand and need, focusing on creating a more viable mixed-use downtown area integrating creative residential housing opportunities, and establishing a gateway to the city.

Local Knowledge

The Central Firebaugh Revitalization Plan, adopted in 2006, illustrates that new commercial development in Firebaugh may capture some of the retail “leakage” that currently occurs, with the objective of providing a significant opportunity for increased vitality and viability of O Street businesses. The creation of a distinct, walkable central city core is intended to increase the desirability of the city to attract new businesses and residential developers and improve access to resources for current and future residents. The focus was ensuring that new development will be designed and strategically positioned to complement, rather than compete with, the existing O Street environment, which is not only the location of scattered commercial business and services, but also an existing resource for more affordable rental and ownership housing neighborhoods. The City’s design consultant, Opticos Design, explored the potential long-term creation of a new mixed-use center at the intersection of Highway 33 and 12th Street, which could combine new retail, civic, office, and housing development organized around a public plaza that would provide O Street with a strong southern anchor and provide the community with a “front door” image that would be unique and positive.

It was envisioned that current underutilized and vacant land along the east side of O Street between 11th and 12th Streets could, in the future, be developed with a new City Hall or other civic use, providing a strong visual backdrop to the public plaza. Along its northern and southern sides, new, two- to three-story, mixed-use buildings could house ground-floor retail with housing and offices above. The plan recommended that in the short term, the City should focus on making physical street improvements to O Street that can make the street more appealing to shoppers, particularly between 9th Street and 12th Street. Several of the recommended improvements to promote accessibility were included in previous Capital Improvement Programs (CIPs) and included:

- SR 33 sidewalk upgrades
- SR 33 bike lane installation
- SR 33 landscaping and lighting improvements
- Downtown streetscape improvements
- Riverfront improvements
- Bike route completion
- Safe routes to school program
- Pedestrian trails

The longer-term benefits of implementation of the place-making objectives of the Downtown Revitalization Plan, and subsequent improvements, including integration of affordable and market-rate housing into the fabric of the downtown would contribute toward increasing access to resource opportunities on a citywide basis, thereby improving low-resource designated residential neighborhoods to moderate-resource areas. Additionally, the City is promoting the attraction of industrial businesses by providing water, sewer, and storm drainage infrastructure to 40 acres of industrially zoned land near Tomatek at the intersection of Highway 33 and Bullard Avenue.

Enforcement and Outreach Capacity

Compliance with Fair Housing Laws

In addition to assessing demographic characteristics as indicators of fair housing, jurisdictions must identify how they currently comply with fair housing laws or identify programs to become in compliance. The City of Firebaugh enforces fair housing and complies with fair housing laws and regulations through a twofold process: review of local policies and codes for compliance with state law, and referral of fair housing complaints to appropriate agencies. The following identify how the City complies with the following fair housing laws:

- **Density Bonus Law (Government Code Section 65915).** The City has included **Program 20** to amend the density bonus ordinance to allow up to a 50.0 percent increase in project density depending on the proportion of units that are dedicated as affordable, and up to 80.0 percent for projects that are completely affordable, in compliance with state law.
- **No-Net-Loss (Government Code Section 65863).** The City has identified a surplus of sites available to meet the Regional Housing Needs Assessment allocation. In total, the City’s surplus unit capacity is 450, composed of 300 lower-income units, 133 moderate-income units, and 17 above moderate-income units.

- **Housing Accountability Act (HAA) (Government Code Section 65589.5).** The City does not condition the approval of housing development projects for very low-, low-, or moderate-income households or emergency shelters, unless specific written findings are made.
- **Senate Bill 35 (Government Code Section 65913.4).** The City will comply with SB 35 by establishing a written policy or procedure, as well as other guidance as appropriate, to streamline the approval process and standards for eligible projects by September 2023 (**Program 24**).
- **Senate Bill 330 (Government Code Section 65589.5).** The City complies with SB 330, relying on regulations set forth in the law for processing preliminary application for housing development projects, conducting no more than five hearings for housing projects that comply with objective general plan and development standards, and making a decision on a residential project within 90 days after certification of an environmental impact report or 60 days after adoption of a mitigated negative declaration or an environmental report for an affordable housing project. The City has included **Program 24** to formalize this process by establishing a written procedure to be made available on the City’s website and at public counters.
- **California Fair Employment and Housing Act (FEHA) and Federal Fair Housing Act.** The City provides protections to residents through referrals to legal assistance organizations, such as Fair Housing Council of Central California and California Rural Legal Assistance (CRLA) and has included **Program 30** to meet with local fair housing and legal aid organizations, and other interested cities in Fresno County, to develop materials or biannual training for landlords on fair housing rights and responsibilities with the intent of reducing, or eliminating, discrimination.
- **Review Processes (Government Code Section 65008).** The City reviews affordable development projects in the same manner as market-rate developments, except in cases where affordable housing projects are eligible for preferential treatment, including, but not limited to, on residential sites subject to AB 1397.
- **Assembly Bill 686 (Government Code Section 8899.50).** The City has completed this AFH and identified programs to address identified fair housing issues in **Table 1C-14, Factors Contributing to Fair Housing Issues**.
- **Equal Access (Government Code Section 11135 et seq.).** The City offers translation services for all public meetings and offers accessibility accommodations to ensure equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of membership or perceived membership in a protected class.

Fair Housing Outreach

Regional outreach efforts for the Multi-Jurisdictional Housing Element included interviewing Fair Housing of Central California (FHCC) for feedback on housing need, fair housing concerns, and opportunities to affirmatively further fair housing throughout the county. FHCC is a non-profit, civil rights organization dedicated to the elimination of discrimination in housing and the expansion of housing opportunities for all persons. They accomplish this through advocacy, assistance for victims of discrimination, and enforcement of fair housing laws.

In response to the request for input, FHCC noted that the most common fair housing issues reported throughout Fresno County are discrimination on the bases of disability and race. Further, they expressed concern about the aging multifamily housing stock becoming uninhabitable due to physical conditions. However, given the shortage of affordable housing in the region, FHCC noted that many units that have already physically deteriorated are still occupied, posing a risk to occupants. Discrimination by landlords or agents as well as deliberate segregation has resulted in fair housing concerns, particularly for protected and special needs populations, such as persons with disabilities and lower-income households.

FHCC emphasized a need for more government involvement in enforcement of fair housing laws. Currently, affordable housing options are often concentrated in specific neighborhoods. When developers are encouraged to continue to build affordable units in these areas as a result of zoning or other government regulations, this results in either intentional or unintentional segregation based on income. When asked about opportunities for local governments to actively improve outreach regarding fair housing and to combat existing issues, FHCC identified several opportunities including local rent controls to manage affordability and reduce displacement risk, code enforcement to ensure a safe and habitable housing stock, funding fair housing groups such as FHCC to enforce fair housing laws, and adjusting regulations or encouraging development of a variety of unit types and sizes throughout the jurisdiction to promote mobility and integration.

In response to the feedback received, the City has included Program 28 to improve fair housing outreach capacity and multilingual accessibility to all public resources, information, and meetings, including fair housing resources. This program also includes steps to establish a procedure to connect residents with fair housing organizations, make information readily available and accessible on the City’s website and in public buildings, and conduct biannual trainings for landlords on fair housing laws, rights, and responsibilities.

Discrimination Cases

In its 2020 Annual Report, the California Civil Rights Department (previously Department of Fair Employment and Housing) reported that it received nine housing complaints from residents of Fresno County, approximately 1.0 percent of the total number of housing cases in the state that year (880). As part of the Fair Housing Assistance Program (FHAP), the Civil Rights Department also dual-files fair housing cases with HUD’s Region IX Office of Fair Housing and Equal Opportunity (FHEO), reporting them by the origin of the issue.

HUD FHEO reported that there were no cases filed by residents of the City of Firebaugh between January 2013 and April 2021. However, one inquiry was made, though the claimant did not report a basis for discrimination as part of the inquiry and it was therefore not pursued further. While there were no cases in Firebaugh, this does not necessarily mean that there is no discrimination. In some cases, residents may be hesitant to report discrimination, such as in the case of undocumented residents that fear retaliation, or may not be aware of fair housing legal assistance available to them.

Through **Program 30** the City will provide fair housing materials in print and online in both English and Spanish and will establish a procedure to refer residents with fair housing questions to the Fair Housing Council of Central Valley (FHC-CC), California Rural Legal Aid (CLRA), and other fair-housing organizations. The City will also coordinate with local service to providers to conduct biannual trainings for landlords and tenants on fair housing laws, rights, and responsibilities. The City will also continue to participate in the countywide Housing Element Technical Committee to collaborate on addressing regional issues such as fair housing (**Program 1**).

Sites Analysis

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for housing elements to analyze the location of lower-income sites in relation to areas of high opportunity.

Table 1C-13, RHNA Capacity by Block Groups and Census Tract 84.01 in Firebaugh, presents the RHNA capacity by block groups within the single census tract in the city, with the existing conditions of each block group for median income, non-White population, TCAC/HCD resource designations, and jobs proximity index at the block group level. The remaining fair housing indicators are reported at the tract level; therefore, all of the unit capacity has been identified with a disability rate of 8.3 percent, a low/moderate-income rate of 69.4 percent, the census tract layer poverty rate is 27.7 percent, an overcrowding rate of 16.3 percent, a 50.5 percent renter overpayment rate, and 30.6 percent homeowner overpayment rate. All block groups qualify as a disadvantaged community with a CalEnviroScreen score in the 90.4th percentile, with characteristics of vulnerability to displacement and disproportionate housing need.

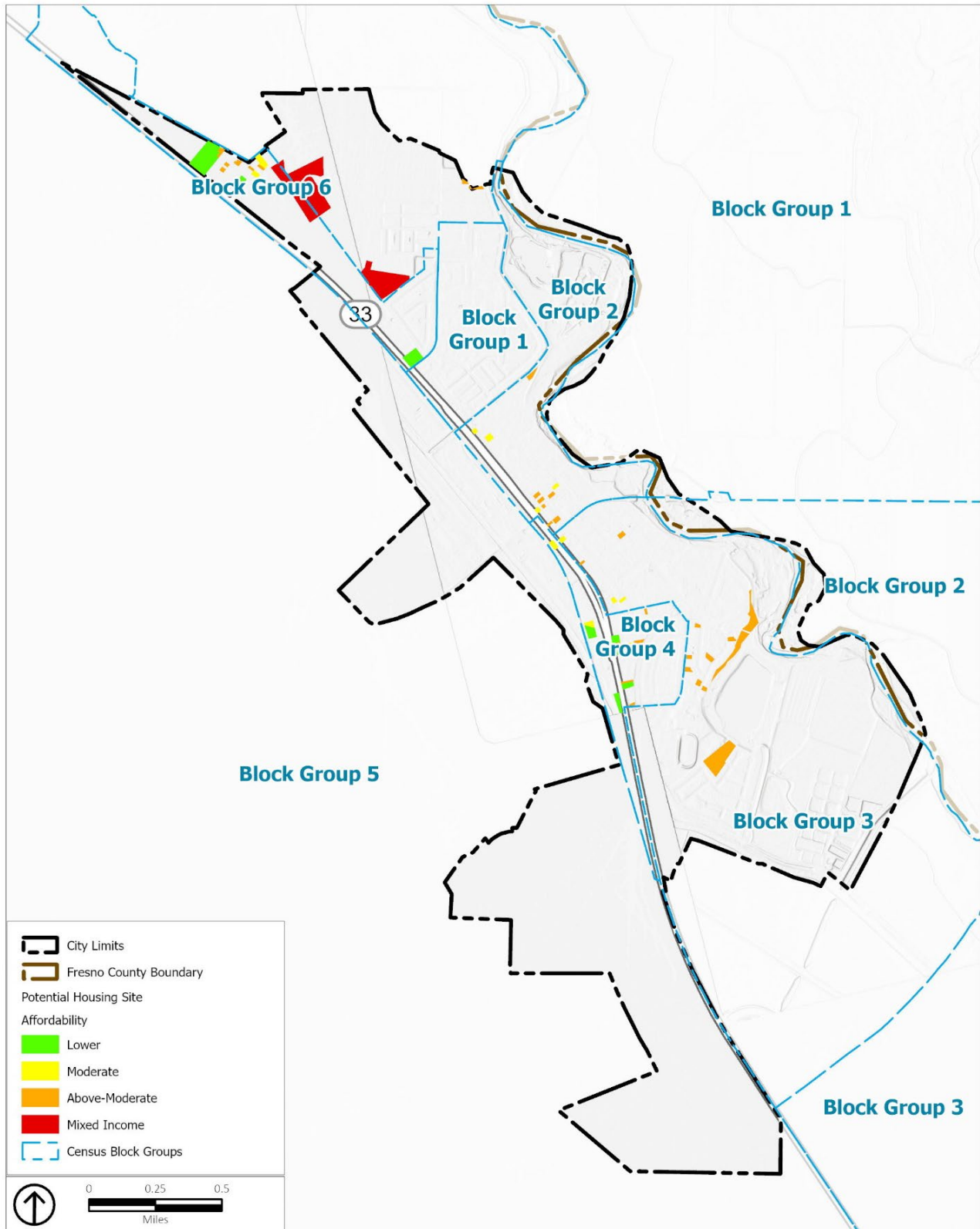
Figure 1C-18, Block Groups Within Census Tract 84.01 in Firebaugh, shows the location of the five block groups in the city. Census tract 84.01 includes land in the city as well as land in the adjacent unincorporated county to the north, west, and south. As shown, only moderate- and above moderate-income sites are identified in the two block groups (2 and 3) within the main portion of the city. The two block groups on the western side of the city (4 and 6) include individual sites at each income level, as well as a mixed lower- and moderate-income site and a mixed lower- and above moderate-income site in block group 4. Mixed-income sites that include all three income categories are identified in block group 5 in the northeastern portion of the city. Block group 1, the furthest east, identifies only a single infill above moderate-income site, and therefore is not discussed in detail.

TABLE 1C-13 RHNA CAPACITY BY BLOCK GROUPS AND CENSUS TRACT 84.01 IN FIREBAUGH

Census Tract/ Block Group	Existing Households	RHNA Capacity			AFFH Indicators												
					Integration and Segregation						Access to Opportunity			Displacement Risk			
		Low	Mod.	Above Mod.	Median Income	Poverty Rate	Low- to Moderate-Income Population	Non-White Population	Disability Rate	R/ECAP Status	Resource Designation	Jobs Proximity Index	CalEnviro Screen Percentile	Over-Crowding Rate	Renter Over-Payment Rate	Homeowner Over-Payment Rate	% Renter Households
84.01/1	715	0	0	1	\$31,667	32.2%	69.4%	98.4%	8.3%	No	Low	1	90.4	16.3%	50.5%	30.6%	58.5%
84.01/2	190	0	16	22	\$28,147	32.3%	69.4%	91.1%	8.3%	No	N/A	1	90.4	16.3%	50.5%	30.6%	73.2%
84.01/3	427	0	10	55	\$56,250	9.2%	69.4%	78.5%	8.3%	No	Low	1	90.4	16.3%	50.5%	30.6%	24.1%
84.01/4	324	52	23	13	\$37,197	43.7%	69.4%	95.8%	8.3%	No	Low	2	90.4	16.3%	50.5%	30.6%	52.2%
84.01/5	287	232	116	119	\$43,718	43.7%	69.4%	91.2%	8.3%	No	Low	85	90.4	16.3%	50.5%	30.6%	40.2%
84.01/6	255	160	32	32	\$43,309	43.7%	69.4%	95.5%	8.3%	No	Moderate	1	90.4	16.3%	50.5%	30.6%	41.2%

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FIGURE 1C-18 BLOCK GROUPS WITHIN CENSUS TRACT 84.01 IN FIREBAUGH



The highest proportion of unit capacity, 52.9 percent, is identified in block group 5. This block group encompasses the northern portion of the city, which is primarily undeveloped vacant land with one residential neighborhood and a subdivision in the development phase, and large expanses of unincorporated county to the north and west of the San Joaquin Valley Railroad. This block group was designated by TCAC/HCD as low resource in 2021. Within this block group, 52.3 percent of lower-income, 58.9 percent of moderate-income, and 49.2 percent of above moderate-income unit capacity is identified within three mixed-income parcels. In this block group, the median income is \$43,718, and 91.2 percent of the population is non-White, and predominantly Hispanic. More detailed income data at the block group level (ACS 2014-2018) provides additional insight into the area, suggesting that the poverty rate in this block group may be lower than the 27.7 percent census tract rate. Renters represent 40.2 percent of the block group, as compared to the overall tract rate of 53.7 percent. This portion of the city also has the highest proximity to jobs, falling in the 85th percentile. The unit capacity will facilitate mixed-income and integrated, diverse neighborhoods in an area where only single-family units have been constructed as of 2022, help combat patterns of concentrated poverty in other portions of the city with housing mobility opportunities for all income levels, and foster improved access to resources and opportunities for lower-income households.

Just over one-quarter of the unit capacity (25.4 percent) to meet the RHNA is identified in block group 6 in the northwestern corner of the city, bounded by SR 33 on the west and Clyde Fannin Road to the east/southeast. This area has a moderate resource designation within the 2021 TCAC/HCD opportunity areas scale. This area is a mix of scattered single-family residential uses, vacant sites, a mobile home park, and commercial/light industrial uses. While the rates of residents with a disability, residents with low or moderate income, household overcrowding, and renter and homeowner housing cost overpayment are the same as in other block groups in the city, this block group has a comparable median income to the adjacent block group 5, at \$43,409. Block group 6 has a predominantly non-White population rate at 95.5 percent, a predominance of owner-occupied households, with a rental rate of 41.2 percent, and an estimated poverty rate below 20.0 percent. Sites on the north side of the city are estimated to provide 30.0 percent of the lower-income unit capacity, which will foster improved housing mobility and access to opportunities for lower-income residents. The additional housing stock will provide mobility options for existing and future moderate- and higher-income households in a moderate-resource designated area, as well as fostering a more income-integrated neighborhood in the northwestern corner of the city as this area develops.

South of the central downtown area, 10.0 percent of the total unit capacity is identified in block group 4, including land at the northern and southern ends of the block group between the San Joaquin Valley Railroad to the west and SR 33, and a single residential neighborhood bounded by Saipan Avenue to the north, Morris Kyle Drive to the south, and Landucci Drive to the west. The block group is designated a low-resource opportunity area according to TCAC/HCD (2021). Land uses include a mix of older, small single-family homes and small multifamily units, a mobile home park, light industrial uses, storage yards, and vacant parcels. While the proportion of seniors citywide is 10.2 percent, 20.9 percent of the residents in this area are seniors, suggesting a proportion of the residents may have aged in place, as the greater part of the homes in this neighborhood were constructed in the 1970s. With a larger proportion of seniors, there is the possibility that a higher proportion of persons with a disability associated with age may reside in this block group. The median income is \$37,197 and

the rate of the population with low to moderate incomes is reflective of the overall rate of these income levels in the census tract, although the poverty rate is below the citywide average of 30.3 percent. The population across the block group is predominantly non-White, with 95.8 percent of residents identifying as non-White. The rate of cost-burdened households and overcrowding is only available at the tract level, and renters comprise 52.2 percent of the residents, comparable to the citywide rate of 53.3 percent. In block group 4, the City has identified capacity on small infill sites, including 11.7 percent of lower-income unit capacity on sites for small multifamily projects, 11.7 percent of moderate-income capacity, and 5.4 percent of above moderate-income capacity. The inclusion of moderate-income unit capacity fosters housing mobility opportunities for “missing middle income” households, which is in proximity to lower-income housing, facilitating a more income-integrated neighborhood. The lower-income unit capacity in this area, while providing mobility opportunities, also helps reduce the higher concentrations of poverty in other parts of the city. CalEnviroScreen scores this tract as a disadvantaged community, likely due to adjacency surrounding agricultural operations, major transportation corridors and railroad lines, and the nearby Firebaugh Airport.

Block group 3 has the highest median income in the city (\$56,250), correlating with the newer single-family Las Laureles neighborhood in the southern end of the city, older residential neighborhoods with varying sizes and price ranges of homes and lots along the eastern edge of the city in the vicinity of the San Joaquin River, three educational facilities, and older residential adjacent to the commercial uses along SR 33 (N Street). The block group is bounded by 13th Street to the north. The population is more diverse in this block group; 76.0 percent of the residents are Hispanic, and 21.5 percent are White non-Hispanic, and the remainder are primarily Asian residents. Residents of this area are predominantly homeowners, with a rate of 24.1 percent for renters, and a generally lower proportion of households in poverty than the tract-level rate. The City has identified 7.4 percent of the unit capacity in this block group, including 22.7 percent of above moderate-income unit capacity on infill sites in the Las Laureles neighborhood and along the river, and 5.1 percent of moderate-income unit capacity. The inclusion of additional above moderate-income housing provides options for existing and future higher-income households, while the moderate-income units facilitate mobility opportunities for middle-income households off SR 33 in the commercial portion of the block group, providing access to business, services, and transit opportunities. No lower-income units were identified.

The remainder of the unit capacity, 4.3 percent, has been identified in block group 2, which is bounded on the west by SR 33, on the east by the San Joaquin River, the south by 13th Street, and the north by the Poso Canal. There is no 2021 resource designation for this block group, although the 2022 COG based update, which designates the resource indicator at the census tract level as discussed previously, assigns this area as low resource. The downtown commercial core is within this block group, as well as older, scattered residential and small multifamily units, Firebaugh Gateway affordable multifamily complex, and a mobile home park. This block group has the lowest median income in the city, at \$28,147, a poverty rate reflective of the citywide poverty rate, and 90.0 percent of the residents are Hispanic, with a total non-White population of 91.1 percent. However, the rate of renter households is 73.2 percent, suggesting that there may be a concentration of cost-burdened renter households in this area.

Moderate-income (8.1 percent of total moderate-income capacity) and the majority of above moderate-income unit capacity (9.1 percent of above moderate-income unit capacity) is identified on infill sites along SR 33, with a small infill pocket of above moderate-income adjacent to the river to foster mixed-income neighborhoods and higher-income housing mobility opportunities. No lower-income unit capacity is identified so as to not further the concentration of renter households.

The City has included **Program 17** to support construction of higher-density housing in areas with access to opportunities and encourage integration of a variety of unit types to facilitate mixed-income neighborhoods, combat patterns of income segregation, and provide housing mobility opportunities for a range of households. The distribution of sites identified in **Section 1C-2** is based on the availability of sites and potential for development during the planning period.

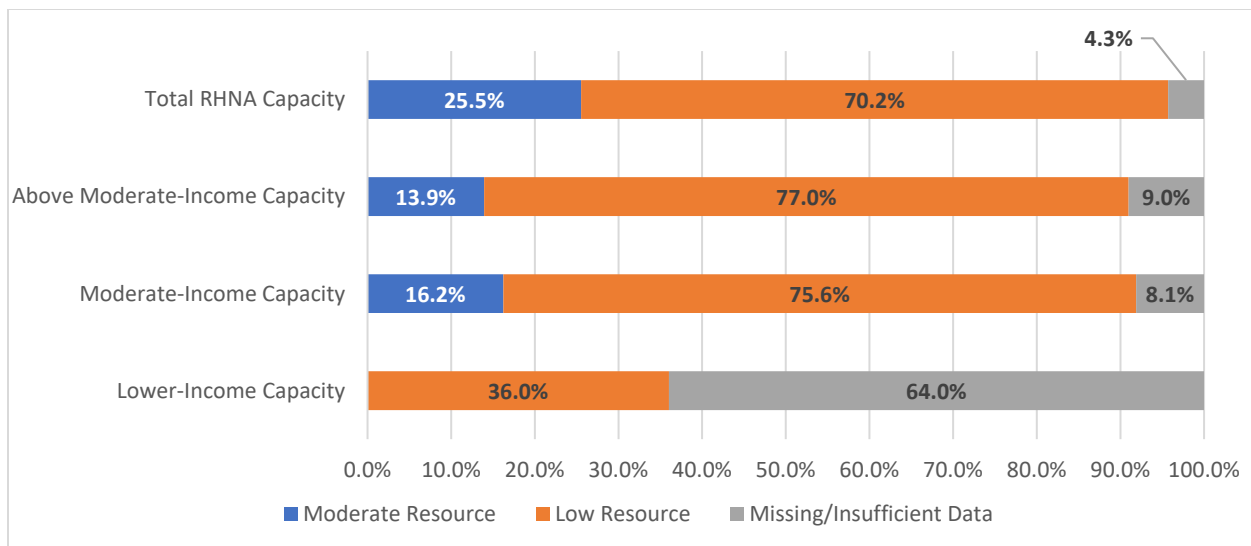
The following sites inventory discussion includes an analysis of the number of projected units by income category, and total RHNA capacity to further assess the potential impacts of the sites inventory to affirmatively further fair housing.

Potential Effect on Patterns of Integration and Segregation

TCAC Resource Category

Figure 1C-19, Percentage of Unit Capacity by TCAC Resource Category, presents the breakdown of unit capacity in Firebaugh by resource opportunity designation. The majority of the total unit capacity (70.2 percent) identified to meet the RHNA is in low-resource areas, 25.5 percent is in the moderate-resource designation, and 4.3 percent is undefined. Because there are no High Resource areas or Areas of High Segregation and Poverty designated in the city, nor areas considered a R/ECAP, they are not reflected on **Figure 1C-19**.

FIGURE 1C-19 PERCENTAGE OF UNIT CAPACITY BY TCAC RESOURCE CATEGORY



Source: 2021 TCAC/HCD Opportunity Map and City of Firebaugh 2023

Firebaugh is designated by TCAC/HCD as moderate resource at the northern entry of the city off SR 33 along the northwestern edge of the city. It should be noted that the 2021 TCAC/HCD resource categories were developed based on a comparison of indicators between jurisdictions in the San Joaquin Valley region, many of which are lower-income communities with higher rates of poverty. Therefore, while tracts may be designated moderate resource, this is in the context of opportunities and potential outcomes in the entire San Joaquin Valley region. Opportunity for all of the unit capacity has been identified on vacant sites with no residential units, therefore not risking displacement of existing residents.

As discussed in the block group/tract analysis, 25.5 percent of the site potential is identified within the moderate resource area in block group 6 in the northwestern corner of the city, with an economic outcome score in the 65th percentile, and education score in the 16th percentile. Lower-income unit capacity (30.0 percent of lower-income unit capacity) reduces the concentration of lower-income and segregated populations in the central block group 1 area where the majority of affordable housing and dedicated farmworker housing are located, thereby helping to reduce potential for displacement of cost-burdened and/or overcrowded households, and provides housing mobility opportunities for lower-income households in a moderate-resource area. Construction of 16.2 percent of moderate-income and 13.2 percent of above moderate-income unit capacity fosters income integration and housing opportunities for higher-income households, which may potentially improve the economic and educational outcome indicators in this area.

The remainder of the site capacity is identified in areas designated by the 2021 TCAC/HCD methodology as low resource, or areas where no designation data is available. While the economic scores vary among the block groups from a low of 25th percentile in the southern block group to 31st percentile in both the western and northeastern portions of the city, the educational outcome scores remain the same all areas of the city. The inclusion of 75.6 percent of moderate- and 77.0 percent of above moderate-income unit capacity in lower-resource neighborhoods, particularly on mixed-income sites in developing northern areas, fosters the potential to increase both the economic outcome and educational attainment scores. The 35.6 percent of lower-income unit potential in low and 64.0 percent in areas with no TCAC/HCD resource designation, which have similar quality of life indicators as the low-resource designated portions of the city increases housing supply to meet demand and reduce displacement risk for lower-income households in the central portions of the city, particularly block group 1.

Income

Firebaugh is a community with a limited range of household income levels. The lowest-income neighborhoods (with a median income of \$28,147) are found in the central block group, which contains commercial uses, the West Hills College Coalinga–Firebaugh, the Firebaugh Gateway affordable housing complex, and the Plantation Mobile Home Park. This suggests that lower-income households may locate in these areas to access these more affordable housing options. The block group to the southwest of the downtown has a median income of \$37,197, encompassing commercial, industrial, and older residential uses. Both of these neighborhoods fall within the very low-income category based on 2020 state income limits for Fresno County.

The remainder of the city falls within the low-income category. The northernmost block group has a median income of \$43,309. The adjacent block group east of Clyde Fannon Road, where the Mendoza Terrace public

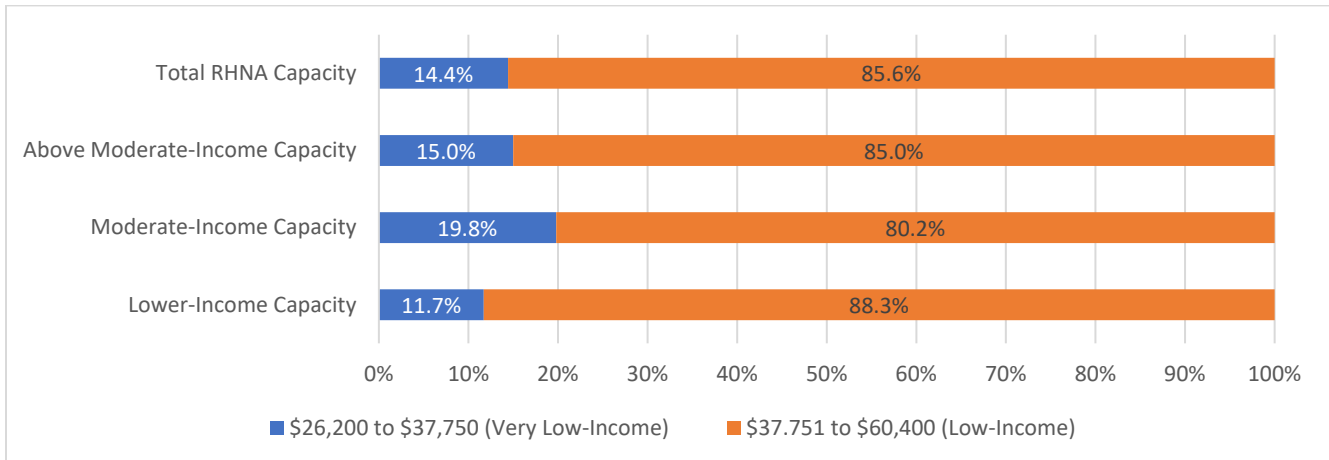
housing development is located, has a median household income of \$31,667, although only a single unit is identified in this neighborhood. The highest median household income (\$56,250) is found in the southern Las Laureles neighborhood.

As shown in **Figure 1C-20, Percentage of Unit Capacity by Median Income**, 14.4 percent of unit capacity has been identified on sites within very low-income neighborhoods in the central downtown/West Hills College block group, and the western portion of the city between the San Joaquin Valley Railroad and SR 33, with the remainder in low-income neighborhoods throughout the city. Potential for 11.7 percent of lower-income unit capacity is identified on infill sites for small multifamily projects in the very low-income block group 4 on the western edge of the city. The lower-income unit capacity, while providing housing mobility opportunities, reduces potential for displacement of households in poverty and allows them to remain within their neighborhoods, and also helps reduce the conditions of overcrowding and cost burden in other parts of the city.

In addition, 11.7 percent of moderate-income capacity and 5.4 percent of above moderate-income capacity is identified in this area of the city, potentially stimulating place-based revitalization in this industrial and older residential neighborhood and facilitating more income-integrated neighborhoods. In block group 2, 8.1 percent of moderate-income and 9.1 percent of above moderate-income unit capacity is proposed between 11th and 13th Streets along SR 33. The inclusion of higher-income unit capacity fosters housing mobility opportunities for moderate- and higher-income households in proximity to lower-income housing, facilitating a more income-integrated neighborhood.

The majority of lower-income unit capacity (88.3 percent) is identified on sites within low-income areas, with 36.0 percent at the northern entry to the city, and 52.3 percent within mixed-income sites in the developing northern section of the city. The inclusion of 80.2 percent of moderate-income unit capacity and 85.0 percent of above moderate-income unit capacity in these low-income areas fosters income integration and may help facilitate place-based revitalization, while the inclusion of lower-income unit capacity increases lower-income housing stock and housing mobility opportunities for lower-income households, a portion of which are in a moderate-resource designation.

FIGURE 1C-20 PERCENTAGE OF UNIT CAPACITY BY MEDIAN INCOME



Source: 2020 HCD State Income Limits, 2016-2020 ACS, City of Firebaugh 2023

Poverty

At the census tract level, the entire city has a poverty rate of 27.7 percent. The majority of unit capacity is identified in the two northern block groups and the western side of the city, providing approximately 88.3 percent of unit capacity. Poverty rates are estimated to be the highest in the city, although a significant portion of this area is outside of the city in the unincorporated county.

To increase lower-income housing stock to address the need for affordable housing so that cost-burdened and overcrowded households can remain in their neighborhoods as well as encourage housing mobility opportunities and promoting reduction of concentrations of poverty in other areas of the city, 78.3 percent of the lower-income unit potential is identified north of Clyde Fannon Road and 11.7 percent along SR 33 at the western edge of the city. In addition to these lower-income units, 86.8 percent of moderate-income units and 67.8 percent of above moderate-income units are projected in these higher poverty neighborhoods to affirmatively further fair housing through integrated-income development, with 52.3 percent of total lower-income, 58.9 percent of total moderate-income, and 49.2 percent of total above moderate-income unit capacity within mixed-income sites.

An additional 5.1 percent of total moderate- and 22.7 percent of above moderate-income unit capacity is identified in the Las Laureles neighborhood and along the San Joaquin River in the southern portion of the city where the estimated poverty rate is the lowest in the city, increasing the housing stock and providing housing mobility opportunities for higher-income households.

The City has included **Program 15** to actively promote construction of ADUs in higher median income areas and monitor affordability of new ADUs to lower- and moderate-income households. The combination of this program and facilitating the development of high-density housing in income-integrated developments, along primary commercial corridors and at the northern edge of the city will help ameliorate concentrations of poverty. The development of these sites will make Firebaugh more accessible to lower-income households, particularly the significant population of farmworker households, while simultaneously increasing housing mobility opportunities accommodating a wider range of incomes.

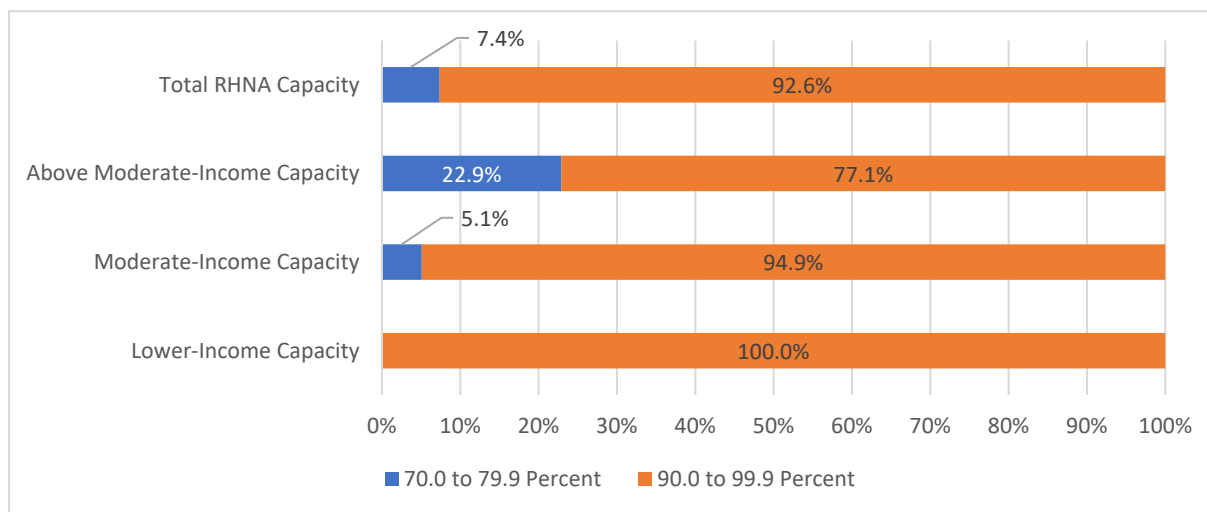
Race

Overall, communities of color residents comprise 93.8 percent of the city's population, with Hispanic residents comprising 92.5 percent. As shown on **Figure 1C-5, Local Racial Demographics**, the distribution of populations of color ranges from 91.1 percent to 98.4 percent across the city, with the southernmost Las Laureles neighborhood with at the lowest percentage of residents of color, at 78.5 percent non-White. **Figure 1C-21, Percentage Unit Capacity by Distribution of Non-White Population**, indicates that 92.6 percent of the total unit capacity has been identified on sites in areas where the distribution of non-White households is over 90.0 percent, with the remainder in the southern portion of the city with the more diverse population.

The majority of lower-income units (88.3 percent) have been identified in areas in the northern portion of the city where 91.2 to 95.5 percent of the population identifies as non-White. This includes a neighborhood at the northern entrance to the city along the SR 33 commercial corridor, and east of the currently developed area in mixed-

income sites, increasing housing resources with access to transit, and anticipated commercial uses and services. The remainder of lower-income unit capacity is identified along the western edge of the city along SR 33, in a 95.8 percent non-White neighborhood with older residential units, a mobile home park, and a scattered mix of industrial and commercial uses. This will also increase lower-income housing mobility opportunities for residents who may otherwise be priced out and are vulnerable to displacement in their own neighborhoods.

FIGURE 1C-21 PERCENTAGE UNIT CAPACITY BY DISTRIBUTION OF NON-WHITE POPULATION



Source: 2016-2020 ACS, City of Firebaugh 2023

The majority of moderate-income unit capacity (94.9 percent) and above moderate-income unit capacity (77.1 percent) is identified in neighborhoods where over 90.0 percent of the population identifies as non-White. This unit potential will provide additional housing mobility opportunities for moderate-income households and facilitate more income-integrated neighborhoods in conjunction with additional lower-income unit potential in close proximity, or co-sited as a mixed lower-, moderate-, and above moderate-income site.

Additional capacity for moderate (22.9 percent) and above moderate-income (5.1 percent) units is distributed among areas with 78.4 percent non-White population and higher incomes in the southern Las Laureles subdivision and along the eastern edge of the city in the vicinity of the San Joaquin River, providing housing mobility opportunities for missing middle income households and higher-income current and future residents.

Disability

Approximately 6.6 percent of Firebaugh's population lives with one or more types of disability. Although there is not a large population of senior residents (10.2 percent) in the city, only 34.2 percent of the senior population in Firebaugh experiences one or more disabilities. The spatial distribution of residents living with disabilities within a single census tract is difficult to specify given the availability of data. However, 20.9 percent of the residents in the western-most block group and 20.8 percent in the central block group 2 are seniors, suggesting there is the possibility that a higher proportion of persons with a disability associated with age may reside in these areas.

Locating units affordable to lower- and moderate-income residents in and around major commercial centers will help to improve access for and accommodate the needs of persons living with disabilities, who often benefit from close access to services and amenities as well as proximity to transit routes.

Unit capacity (10.0 percent of all units) has been identified on the west side of the city and 4.3 percent of the total in the central West Hills College/downtown area with the highest proportion of seniors and potential persons with disabilities. This includes 14.5 percent of the above moderate-income unit capacity, 19.8 percent of moderate-income unit capacity, and 11.7 percent of lower-income unit capacity. These units would provide additional, affordable, accessible housing supply and mobility opportunities for persons with disabilities in locations close to commercial uses, services, and bus stops along SR 33.

The City has identified the greatest proportion of unit capacity on the north side of the city (25.4 percent) and adjacent areas to the east (52.9 percent) in close proximity to SR 33. Overall, 52.3 percent of lower-income, 58.9 percent of moderate-income, and 49.2 percent of above moderate-income unit capacity are co-sited to foster mixed-income developments; and 36.0 percent of lower-income, 16.2 percent of moderate-income, and 13.2 percent of above moderate-income units are sited in such a way as to encourage income-integrated neighborhoods adjacent to commercial opportunities to enhance accessibility for persons with disabilities.

Familial Status

Although the majority of households in the city are married-couple families, 21.6 percent of total households are single-parent, female-headed households, of which, 41.0 percent have their own children, and 10.6 percent of households are single-parent, male-headed family households. The rate of female-headed households in the city with household incomes below the poverty line is 48.4 percent, which suggests that single-parent, female-headed households may have more limited access to housing. The spatial distribution of single female-headed households with children in poverty is difficult to establish with data available only at the tract level in a single census tract jurisdiction, but citywide, between 20.0 and 40.0 percent of children reside in a single-parent, female-headed household.

The availability of 78.3 percent of the total unit capacity in the northern end of the city, including 88.3 percent of lower-income unit potential, increases the opportunities for female-headed households currently experiencing overpayment and/or overcrowding to acquire affordable and adequately sized housing with access to resources to help prevent displacement. The identification of 11.7 percent of the lower-income unit capacity on the west side increases the opportunities for female-headed households with children to obtain housing in an area in proximity to educational facilities, commercial areas, and bus stops. Additionally, moderate- and above moderate-income unit capacity will increase housing mobility opportunities for higher-income single, female-headed households, as well as all other household types, to find appropriate units within Firebaugh. Overall, female-headed households or other single-parent households of any economic status will have access to new housing opportunities, as will persons living alone, seniors, and lower-income families.

Potential Effect on Access to Opportunity

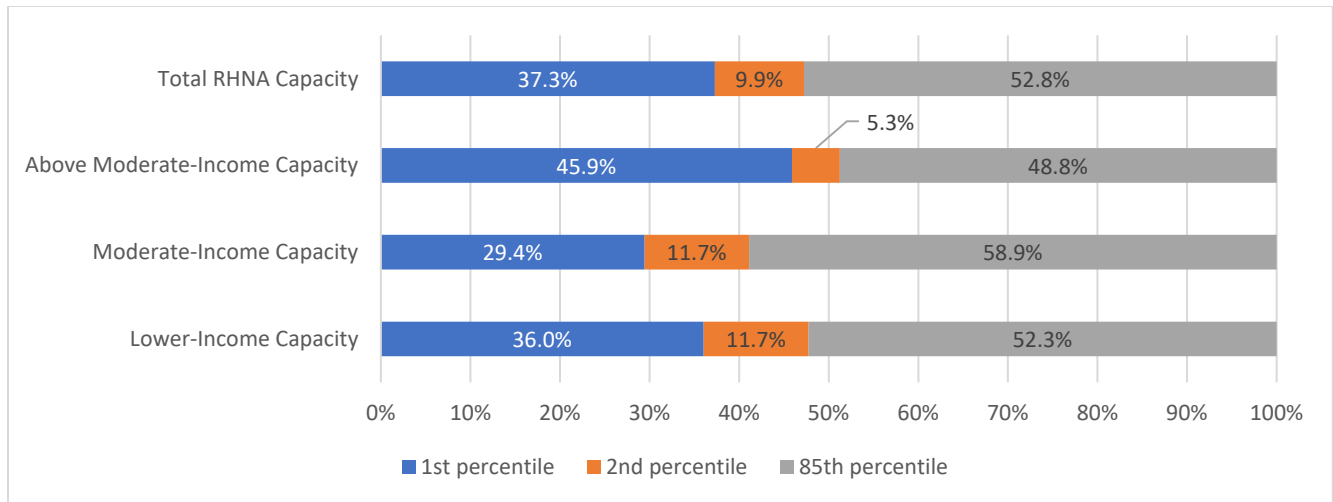
Job and Transit Proximity

With the exception of block group 5 in the northeastern corner of the city, all residential areas in Firebaugh score “furthest proximity,” with scores in the 1st and 2nd percentile according to HUD Jobs Proximity Index scores, which measure employment accessibility in residential neighborhoods (100 being the highest and 0 being the lowest). This is likely due to a lack of a large downtown commercial core and the estimated farmworker population residing in the city who work primarily within farm operations in the unincorporated county. Block group 5, which is largely undeveloped and includes unincorporated land to the north, west, and south of the city, ranks in the 85th percentile, possibly associated with proximity to destinations of farmworkers residing with Firebaugh.

As shown on **Figure 1C-22, Percentage of Unit Capacity by Jobs Proximity Index Scores**, 52.8 percent of the unit capacity is sited in areas with the highest jobs proximity index score in block group 5, including 48.8 percent of above moderate-income unit capacity, 58.9 percent of moderate-income unit capacity, and 52.3 percent of lower-income unit capacity on mixed-income sites with close access to SR 33. This can provide housing mobility opportunities for all income levels, close proximity to employment opportunities along SR 33 and in the central commercial area, and access to employment opportunities in the surrounding unincorporated area. Additional unit potential (25.4 percent of all units) is in the northwest corner of the city with a jobs proximity score in the 2nd percentile, although the sites have direct access to SR 33, providing 36.0 percent of lower-income, 16.2 percent of moderate-income, and 13.2 percent of above moderate-income unit capacity in the vicinity of commercial uses. This also provides affordable housing opportunities for farmworkers and other lower-income households as well as housing opportunities for higher-income commuters.

The remaining portions of the city, which have jobs proximity scores in the 1st percentile, also provide access to employment opportunities along the SR 33 commercial corridor, as well as five bus stops that connect to the transit system in Fresno County with access to jobs outside the city. Development of these sites will help to further improve the jobs-housing ratio, with residential development in and near commercial and transit corridors as well as income-integrated and mixed-income development, thus improving jobs proximity for city residents.

FIGURE 1C-22 PERCENTAGE OF UNIT CAPACITY BY JOBS PROXIMITY INDEX SCORES



Source: 2016-2020 ACS, City of Firebaugh 2023

Environmental Health

CalEnviroScreen 4.0 scores for Firebaugh demonstrate adverse environmental conditions citywide, with scores in the 90th percentile (**Figure 1C-11, CalEnviroScreen Scores**). In Firebaugh, the entire city is considered an SB 535-qualifying disadvantaged community because its CalEnviroScreen scores are in the 75th percentile or greater. Disadvantaged communities are areas of potential concern regarding fair housing, including disproportionate exposure to environmental hazards and a concentration of vulnerable populations. Commercial agriculture close to Firebaugh may contribute to these adverse environmental conditions. Population indicators that contribute to a population in a census tract being considered “vulnerable,” such as unemployment, linguistic isolation, education, and health factors, may vary between block groups and neighborhoods in the city, although at the tract layer the differences are not identified. Therefore, it is possible that not all areas of the city contain similar concentrations of vulnerable populations.

All of the sites inventory capacity has been identified in neighborhoods scoring above the 90th percentile. Many of these sites have been identified along SR 33, the major circulation corridor, in the vicinity of the airfield, around the edges of the city adjacent to agricultural uses, or in the vicinity of industrial or other nonresidential uses, which suggests that these factors may influence the environmental pollution scores. In the southern block group, which has the highest income in the city, a relatively low estimated poverty rate, the lowest proportion of Hispanic residents in the city, and homeowners are the predominant tenure, the population factors that contribute to the overall percentile score may indicate a less environmentally vulnerable community. Site capacity for above moderate-income (22.7 percent) and moderate-income units (5.1 percent) has been identified in this area, which might experience less environmental vulnerability than can be determined at the overall tract level.

However, development potential throughout the community is envisioned to improve environmental conditions through incorporation of outdoor spaces and transitional buffers and screening between residential and nonresidential uses where appropriate, thus promoting environmental sustainability. Additionally, investment in the older residential areas through development of vacant infill sites will help facilitate place-based revitalization and will increase the supply of housing for all income levels in areas where residents are susceptible to displacement due to lower incomes and housing costs. At the same time, it will encourage income integration between and within new development sites. Unit capacity identified in the northwestern block group provides housing mobility opportunities in the moderate resource area of the city, including siting lower-income unit capacity in the vicinity of moderate- and above moderate-income unit capacity for increased neighborhood income integration potential, whereas all additional site capacity will facilitate housing mobility opportunities.

Potential Effect on Displacement Risk

Overcrowding

The total overcrowding rate in Firebaugh is 15.3 percent, and 4.9 percent of Firebaugh households are considered severely overcrowded. Overcrowding is defined as a household having more than one person per room, not bathrooms, porches, balconies, foyers, halls, or half-rooms. Overcrowding is slightly higher among renters (10.5 percent) compared to homeowners (8.2 percent), with 9.3 percent of renter households experiencing severe overcrowding. This indicates a possible shortage of large rental units with multiple bedrooms, or high rental housing costs that force occupants to either rent smaller units than are needed or share spaces with other households or family members. Homeowner households have a larger household size (3.6 persons per household) than renters (2.5 persons per household). As previously discussed, overcrowding is particularly prevalent among farmworker households and Hispanic households. In Firebaugh, the average household size for Hispanic renters is 3.4 persons and Hispanic homeowners is 3.7 persons, compared to White non-Hispanic households with an average size of 2.1 persons in renter households and homeowners with an average of 2.5 persons. Average household size in the city ranges between 3.2 persons in the downtown area with smaller, older housing stock to 4.2 persons in the block group with affordable Fresno Housing Authority public housing, affordable multifamily complexes, and Maldonado Plaza farmworker housing. Higher concentrations of overcrowding may be partially attributed to increasing housing costs, a shortage of available rentals, high proportions of renters with lower incomes, higher rates of poverty, and familial status, compounded by distribution of populations of color, which may result in overpayment or the necessity to double up families in a unit, or share space with other unrelated persons.

Unit capacity for 5.1 percent of moderate-income unit capacity and 22.7 percent of above moderate-income unit capacity has been identified in the southern block group where homeowner tenure predominates and average household size is 3.5 persons per dwelling. This is lower than the citywide average of 3.8 persons per dwelling. Based on the low proportion of renter households in these neighborhoods, it is likely that there is a lower rate of overcrowding, and, with the higher incomes and estimated lower rates of poverty in this block group, it may be less of a challenge for households to find housing within their ability to pay that accommodates their household size. Although unit capacity has not been identified in the block group with the largest household sizes, a predominance of renter households, high rate of poverty and a concentration of affordable housing stock, the

lower-income unit potential identified in the northern and western block groups in the city will provide additional affordable housing mobility opportunities at a range of sizes to alleviate concentrations of overcrowding within the respective neighborhoods as well as in the central portions of the city. The remainder of the moderate- and above moderate-income unit capacity will facilitate housing opportunities for higher-income households and ease pressure on the housing stock, thus potentially reducing displacement risk and overcrowding for these households.

Overpayment

In Firebaugh, 24.4 percent of households are cost burdened, and 12.4 percent are severely cost-burdened, for a total of 36.8 percent of all households (**Table 1C-9, Cost Burden in Firebaugh, 2010-2018**). Of these households, approximately 53.2 percent are renters. In total, 34.2 percent of renters are cost burdened, and 18.1 percent are severely cost burdened, compared to 12.6 percent and 5.6 percent of homeowners, respectively. Lower- and moderate-income households are most at risk of displacement due to overpayment. As discussed previously, Firebaugh consists of a single census tract, so geographic patterns of overpayment, or geographic comparisons between tenures, cannot be specifically discerned within the city.

However, it is likely that the rate of renter overpayment may be higher in areas of the city with a greater distribution of renter households, lower incomes, and higher rates of persons in poverty. As all students in Firebaugh attend the same schools, and as the whole city has a less positive TCAC/HCD anticipated educational outcome score, determining areas of the city with higher incidence of socioeconomically disadvantaged students is not feasible. Special-needs populations, including female-headed households, large families, persons with disabilities, and seniors often fall into the lower-income category and may be particularly at risk of displacement when housing opportunities at affordable costs, sizes, or access to resources are not available.

Overall, slightly over one-half of households in the city are renters, of which, 50.5 percent are cost burdened. The Downtown/West Hills College area has the highest proportion of renter households (73.2 percent) and the lowest median income, suggesting that a concentration of cost-burdened renters may reside in that area. Lower-income unit capacity is not identified in this block group, so as to not further the concentration of cost-burdened renters.

However, 88.3 percent of lower-income unit capacity has been identified in the developing northern portions of the city in mixed-income sites or in close proximity to proposed higher-income unit capacity to facilitate income integrated neighborhoods. This increases the supply of lower- and moderate-income units in the northeastern side of the city, which is predominantly newer single-family subdivisions, with the majority of lower-income units in close proximity to proposed commercial uses along SR 33. These units will help to alleviate conditions that contribute to overpayment by reducing the gap between supply and demand for this type of housing, help de-concentrate renter overpayment in the central city area, provide housing mobility opportunities for lower- and moderate-income households, and facilitate income-integration with the inclusion of 62.4 percent of the above moderate-income unit capacity.

Approximately 11.7 percent of lower-income unit capacity and 11.7 percent of moderate-income unit capacity is identified along SR 33 and to the west of the highway where 52.2 percent of households are renters, and have very low income according to 2020 HCD State income limits. In addition, 5.4 percent of above moderate-income unit capacity is identified on scattered infill sites. The inclusion of additional affordable housing stock in this area will provide housing mobility opportunities for lower-income households and contribute to the reduction of households at risk of displacement throughout the city, and increase accessibility to commercial uses, transit stops, and services along SR 33 and within the commercial center of the city.

Homeowners comprise just under one-half of households in Firebaugh, and the rate of homeowner overpayment at the tract level in Firebaugh is 30.6 percent, indicating a need for additional housing stock affordable to a variety of potential homeowners. In the southern block group, three-quarters of the households are homeowners, with more positive quality of life indicators than other areas of the city. Therefore, the identification of 22.7 percent of above moderate-income and 5.1 percent of moderate-income units will provide homeownership mobility opportunities for middle and higher-income households seeking to relocate within, or from outside the city, to Firebaugh.

Homeownership is also the predominant tenure in the northeastern block group, which includes one single-family subdivision and no multifamily stock, and a low median income, although higher than the central and western areas of the city. The existing homes in this neighborhood, based on a Zillow.com survey (June 2023) range in sales price between \$225,000 and \$250,000, which, as presented by Table 2-24 in the Housing Needs Assessment, is affordable to low-income households. Therefore, it is likely that the rate of homeowner overpayment in this neighborhood would not exceed and may be below the tract level rate, although the available housing stock is limited; therefore, potential low-income homeowners might have a difficult time securing a home in this area. However, the new subdivision currently under construction adjacent to this existing resource of affordable single-family housing is available at a higher market price affordable only to moderate-income households without overpayment.

Similar conditions exist in the northwestern block group, where homeownership is also the predominant tenure. These units are priced above \$300,000 and would also be affordable only to moderate-income households. The remainder of the potential owner-occupied units include mobile homes and scattered older units on large lots in various maintenance conditions. However, the presence of this higher priced housing stock, while limiting the stock of units affordable to lower-income households, provides much-needed middle-income housing. The market scan did not find units within the affordability range for above moderate-income households, but higher-income households have the ability to purchase less expensive housing. To provide housing stock and housing mobility opportunities for all income levels, 78.3 percent of the unit capacity has been identified within the northern block groups, including 88.3 percent of lower-income, 75.1 percent of moderate-income, and 62.4 percent of above moderate-income units within a mixed-income neighborhood at the entrance to the city and income-integrated sites with all three levels of affordability in the northeastern area. The inclusion of the moderate- and above moderate-income unit potential may also contribute to improving the TCAC/HCD economic outcome and anticipated educational potential scores.

The Downtown/West Hills College area has the lowest proportion of homeowner (26.8 percent) households and the lowest median income, suggesting that although limited, a concentration of cost-burdened homeowners may reside in that area. Because the area has a lower median income, a higher rate of extremely low-income households, and a higher proportion of senior households that may be on fixed incomes, the central core area may have the highest need for affordable ownership stock. Lower-income unit capacity is not identified in this area so as to not further the concentration of extremely low-income households, renter households, and to foster more income-integrated neighborhoods, but 4.3 percent of the unit capacity, including 9.1 percent of above moderate- and 8.1 percent of moderate-income unit capacity is located in this area of the city in proximity to commercial and service uses.

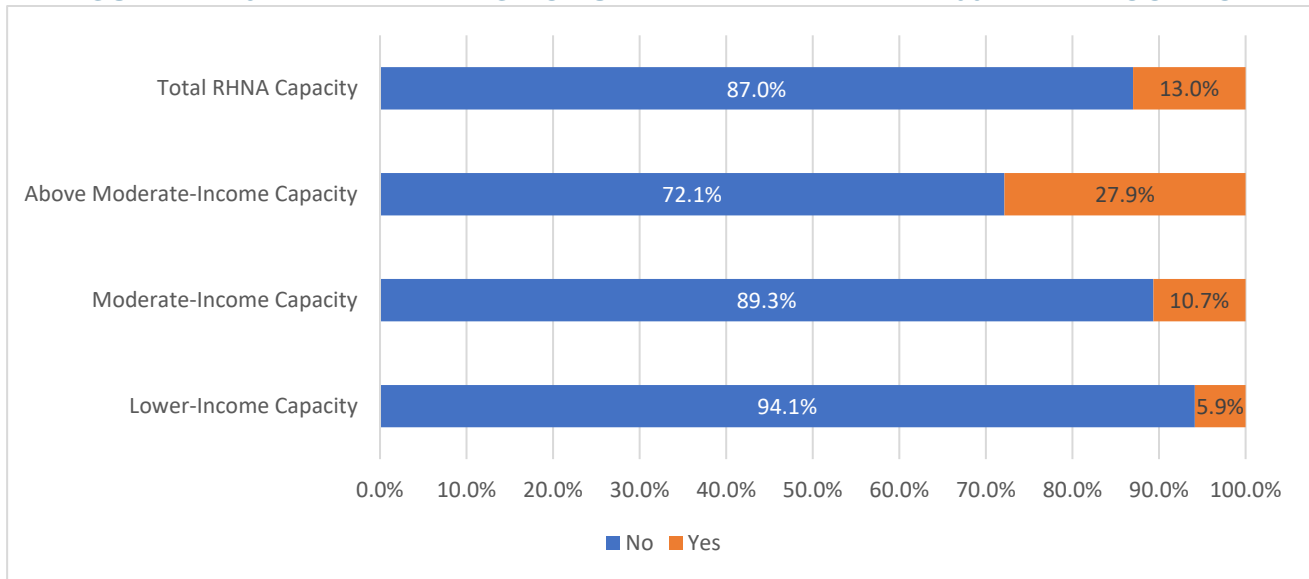
Just under 50.0 percent of the residents in the western block group are homeowners, the majority of whom reside in the Beehive Drive/Cardella Street neighborhood, where older units (built in the 1970s) are affordable to households in the low-income range. However, the median income in this area falls within the very low-income category. Therefore, it is possible that a higher proportion of residents in this area are overpaying for housing than the rate citywide. The identification of lower- (11.7 percent) and moderate-income (11.7 percent) housing unit capacity in the western area can help de-concentrate rates of overpayment in this neighborhood while providing housing mobility opportunities for all lower and moderate-income households experiencing overpayment and risk of displacement. Above moderate-income unit capacity throughout the city facilitates more income-integrated neighborhoods and provides additional housing stock for above moderate-income households, which may alleviate some homeowner overpayment among higher-income households.

Disaster-Driven Displacement Risk

In Firebaugh, there are a few areas within the older central portion of the city and residential areas in the vicinity of the San Joaquin River that have heightened flood risk, Zone AE (**Figure 1C-23, Flood Hazard Zones**), including much of the east side of the city south of 13th Street and east of SR 33. Although the Las Laureles neighborhood is excluded from the Zone AE designation, the older residential areas in the western block group where much of the affordable single-family and small multifamily units are located and the upper portion of block group 5 with homes in the moderate- and above moderate-income range all falls within the AE Zone. According to the Fresno County Hazard Mitigation Plan (FCHMP), a total of 464 developed parcels are within the 100-year floodplain.

As shown in **Figure 2C-22, Percentage of Unit Capacity Within 100-Year Flood Zone**, 13.0 percent of the total unit capacity is in areas identified by FEMA as subject to flooding during a 100-year flood event, including 5.9 percent of lower-income unit capacity, 10.7 percent of moderate-income unit capacity, and 27.9 percent of above moderate-income unit capacity.

FIGURE 1C-23 PERCENTAGE OF UNIT CAPACITY WITHIN 100-YEAR FLOOD ZONE



Contributing Factors

Through discussions with stakeholders, fair housing advocates, and this assessment of fair housing issues, the City identified factors that contribute to fair housing issues, as shown in **Table 1C-14, Factors Contributing to Fair Housing Issues**. While there are several strategies identified to address the fair housing issues, the most pressing issues are the concentration of lower-income households resulting in the R/ECAP designation and exposure of these households to negative conditions such as flood and pollution. While Firebaugh offers valuable affordable housing opportunities that may draw lower-income households to the community, residents face barriers to accessing educational and economic opportunities that present a fair housing concern compared to the region. Prioritized contributing factors are **bolded** in **Table 1C-14** and associated actions to meaningfully affirmatively further fair housing related to these factors are ***bold and italicized***. Additional programs to affirmatively further fair housing are included in **Section 1C-1, Action Plan**.

TABLE 1C-14 FACTORS CONTRIBUTING TO FAIR HOUSING ISSUES

AFH Identified Fair Housing Issue	Contributing Factor	Meaningful Actions
High rate of overpayment, particularly among renters, and high rates of overcrowding. High risk of displacement throughout the city.	Low income levels throughout the city compared to the cost of rental housing. Limited availability of affordable housing.	<i>Program 4 – Provision of Adequate Sites</i> Program 7 – Encourage Mixed-Use Projects and Residential Units in Commercial Zones <i>Program 10 – Affordable Housing Incentives</i> <i>Program 13 – Extremely Low-Income Households</i> <i>Program 14 - Preservation of At-Risk Housing Units</i> Program 15 – Encourage and Facilitate Accessory Units Program 17 – Housing for a Variety of Needs Program 29 – Housing Choice Vouchers
Flood risk for some households	Floodplain in the southeast area of the city.	<i>Program 18 – Environmental Hazard Mitigation</i> Program 28 - Weatherization
Limited access to services and resources	Limited transit connectivity Distance to a range of job types Low school performance scores	<i>Program 31 – Improve Access to Resources</i>
Displacement risk for persons with disabilities	Shortage of supportive units Limited transit connectivity	<i>Program 4 – Provision of Adequate Sites</i> Program 7 – Encourage Mixed-Use Projects and Residential Units in Commercial Zones <i>Program 10 – Affordable Housing Incentives</i> <i>Program 13 – Extremely Low-Income Households</i> <i>Program 14 - Preservation of At-Risk Housing Units</i> Program 15 – Encourage and Facilitate Accessory Units Program 17 – Housing for a Variety of Needs Program 29 – Housing Choice Vouchers Program 31 – Improve Access to Resources

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SECTION 1C-4: CONSTRAINTS

Land Use Controls

Analysis

General Plan

Land use controls are basically minimum standards in the City's Zoning and Subdivision Ordinances. Zoning is essentially a means of ensuring that the land uses of a community are properly situated in relation to one another, providing adequate space for each type of development. The 2030 Firebaugh General Plan includes four land use designations that allow residential development (see **Table 1C-15**).

TABLE 1C-15 GENERAL PLAN LAND USE DESIGNATIONS

Designation	Maximum Density	Typical Uses	Compatible Zoning
Residential Designations			
Rural Residential	2 du/acre	Limited to lands where it is advantageous to keep residential densities very low to protect resources or to reduce exposure of higher population concentrations to potential impacts, such as flooding.	U-R, PD
Low Density	6 du/acre, or 21 persons/acre	Reserved for single-family residential developments and other complementary uses that are typically associated with single-family neighborhoods, such as churches, day-care centers, community centers, parks, and schools.	R-1, PD
Medium Density	10 du/acre, or 35 persons/acre	Medium-density development could encompass a mix of single-family and small-scale multifamily uses, including duplex, tri-plex, and four-plex units and mobile home parks. This designation shall generally be located in areas of the community that are free from conflicting land uses, such as industrial and commercial uses that may generate noise, hazards, and odors. Distance from Firebaugh Airport is also a critical issue. Designations near State Highway 33 and the Union Pacific Railroad should generally be avoided.	R-1, R-1-4.5, R-1-5, R-2, PD
High Density	23 du/acre, or 79 persons/acre	Provide attractive multiple-family residential neighborhoods. Dwellings should be designed to have the appearance of single-family homes, with useable front porches, parking to the rear, and ample landscaping along shady, tree-lined streets.	R-2, R-3, PD

Designation	Maximum Density	Typical Uses	Compatible Zoning
Commercial General	Consistent with Standards in the R-3 Zone.	Provide for shopping centers, highway commercial uses, retail uses, and offices.	C-1
Central Commercial	Consistent with Standards in the R-3 Zone.	Intended to protect and foster downtown Firebaugh by strengthening the “downtown” atmosphere.	C-2
Commercial Service	Consistent with Standards in the R-3 Zone.	Provides for uses that include a mix of retail and service-oriented commercial uses. In particular, uses such as auto repair should be directed into this category.	C-3

Source: City of Firebaugh Zoning Ordinance, 2022.

Conclusion

The General Plan land use designations offer a range of housing densities in the community.

Recommended Action

None required.

Zoning Ordinance

Analysis

The City’s Zoning Ordinance contains the following zoning districts that allow for residential development (see Table 1C-16).

TABLE 1C-16 ZONING DISTRICTS PERMITTING RESIDENTIAL DEVELOPMENT

Zoning District	Minimum Lot Size	Purpose
RA (Rural Residential)		<i>Established but not currently defined in the Zoning Code.</i>
R-1 (Single-Family Residential)	1 du/6,500 sf of lot area	Provide living areas that are generally limited to low-density concentrations of single-family dwellings.
R-1-5 (Single-Family Residential)	1 du/5,000 sf of lot area	
R-1-4.25 (Single-Family Residential)	1 du/4,250 sf of lot area	
R-1 (TN) (Single-Family Residential, Traditional Neighborhoods Development)	1 du/6,500 sf of lot area	The purpose of the R-1 (TN) districts is to provide livable and pedestrian-oriented residential areas that are generally limited to low-density concentrations of single-family dwellings. A key feature of the Traditional Neighborhood Zones is the review of architectural character of new dwellings and emphasis on careful design to encourage a pedestrian-friendly neighborhood environment.
R-1-5 (TN) (Single-Family Residential, Traditional Neighborhoods Development)	1 du/5,000 sf of lot area	
R-1-4.25 (TN) (Single-Family Residential, Traditional Neighborhoods Development)	1 du/4,250 sf of lot area	

Zoning District	Minimum Lot Size	Purpose
R-2 (Low-Density Multiple-Family Residential)	1 du/3,250 sf of lot area	The purpose of the R-2 and R-3 districts is to provide living areas that are limited to medium- and high-density concentrations of multifamily dwellings as well as other uses suitable to the intent of the zone.
R-3 (Medium-High-Density Multiple-Family Residential)	1 du/1,500 sf of lot area	
C-1 (Neighborhood Commercial)	1 du/1,500 sf of lot area, subject to standards of the R-3 Zone	The purpose of the Neighborhood Commercial district is to provide for the development of small-scale, low-intensity commercial uses that serve the daily needs of residential neighborhoods that are in close proximity to the shopping center. The design of neighborhood commercial centers shall be of a scale and design that is compatible with the surrounding residential neighborhoods. In addition, the design of the center should provide for pedestrian access from surrounding neighborhoods.
C-2 (Central Commercial)	1 du/1,500 sf of lot area, subject to standards of the R-3 Zone	The C-2 district is intended to help strengthen the vitality and character of Firebaugh's downtown commercial district by establishing an appropriate list of permitted uses and regulating the size and location of buildings, parking lots, landscaping, and other improvements in a manner that promotes a vibrant, pedestrian-oriented shopping environment.
C-3 (General Commercial)	1 du/1,500 sf of lot area, subject to standards of the R-3 Zone	The purpose of the General Commercial district is to provide for a wide variety of commercial and service businesses that cater to the daily needs of Firebaugh and the surrounding area. New development in this zone will occur in buildings and complexes that exhibit high standards of design, including sites with generous amounts of landscaping; screening of outdoor storage, repair, and assembling areas from the public's view; and where the impact of noise, vibrations, and light on surrounding properties are minimized.
MHP (Mobile Home Park)	1 mobile home/2,400 sf of lot area	The purpose of this section of the Municipal Code is to establish standards for the development of mobile home parks in Firebaugh. Firebaugh's housing element acknowledges that these developments are a valuable source of housing for the elderly and households in the lower- to moderate-income categories. Further, the higher densities of mobile home parks can help to conserve valuable farmland.
UR (Urban Reserve)	1 single-family dwelling, not more than one dwelling per lot, subject to standards of the R-1 Zone	The purpose of the Urban Reserve (UR) district is to reserve, in a substantially undeveloped state, areas planned for future urban use where, because the areas currently lack public facilities or services or because the need for urban expansion within them is not immediate, it is preferable to prevent the development of uses or structures that might be premature or conflict with the future planned urban use of the areas.
PD (Planned Development Overlay)	Varies	The purpose of the Planned Development (PD) overlay district is to promote development designs that respond to significant planning-related issues facing Valley cities, including the need to protect air quality, reduce urbanization of agricultural land, housing affordability, traffic, aesthetics, and the desire to promote more livable neighborhoods. The

Zoning District	Minimum Lot Size	Purpose
		PD overlay district can be combined with any single-family, multifamily, commercial, or industrial district identified in the zoning ordinance.

Source: City of Firebaugh Zoning Ordinance, 2016.

Conclusion

The City's Zoning Ordinance provides for a range of housing options.

Recommended Action

None required.

Residential Development Standards

Analysis

Table 1C-17 lists and describes the residential development standards required in Firebaugh. These development standards are typical and consistent with standards established in surrounding communities. Zoning and development standards are posted on the City's website, pursuant to Gov. Code Section 65940.1 subd. (a)(1)(B)).

TABLE 1C-17 RESIDENTIAL DEVELOPMENT STANDARDS

Zoning District	Minimum Lot Size	Density	Height (ft.)	Coverage	Minimum Lot Dimensions (ft.)		Minimum Setbacks (ft.)		
					Width	Depth	Front	Rear	Side
R-1	6,500 sf	6 du/ac	25	n/a	60	100	20	10	n/a
R-1-5	5,000 sf	8 du/ac	25	n/a	50	90	20	10	n/a
R-1-4.25	4,250 sf	10 du/ac	25	n/a	40	n/a	10	10	n/a
R-1 (TN)	6,500 sf	6 du/ac	25	n/a	60	100	15	10	n/a
R-1-5 (TN)	5,000 sf	8 du/ac	25	n/a	50	90	15	10	n/a
R-1-4.25 (TN)	4,250 sf	10 du/ac	25	n/a	40	n/a	10	10	n/a
R-2	6,500 sf.	1 du/3,250 sf of lot area	25	50%	65	100	15	10	5
R-3	7,500 sf.	1 du/1,500 sf of lot area or 20 du/ac ⁴	25	80%	65	100	15	10	5
C-1	No requirement	1 du/1,500 sf of lot area, subject to standards of the R-3 Zone	35	n/a	n/a	No requirement	10	No requirement	No requirement
C-2	No requirement	1 du/1,500 sf of lot area, subject to standards of the R-3 Zone	35	n/a	n/a	No requirement	At least 1/2 of property line must abut building wall	No requirement	No requirement
C-3	No requirement	1 du/1,500 sf of lot area, subject to standards of the R-3 Zone	35	n/a	n/a	No requirement	10	No requirement	No requirement
MHP									
Mobile Home Park	1 ½ ac	1 mobile home/2,400 sf of lot area	25	75%	n/a	n/a	15	15	15
Mobile Home	1,500 sf				12	n/a	10	10	5

Source: City of Firebaugh, March 2023.

⁴ Residential development on parcels larger than 3/4 acre shall have a minimum density of 20 units per acre to ensure affordability, consistent with state affordability standards, unless it can be demonstrated that affordability can be achieved with a lesser density.

Parking

Table 1C-18 summarizes the residential parking requirements in Firebaugh.

TABLE 1C-18 RESIDENTIAL PARKING STANDARDS, FIREBAUGH

Type of Residential Development		Required Parking Spaces
Single-family residence		2 covered spaces/unit
Second unit		1 uncovered space/unit
Condominium	1 BR	1 covered space/unit
	2+ BR	2 covered spaces/unit
Multiple family		1.5 spaces/unit, half of which should be covered
Mobile home park		2 covered spaces/unit 1 supplemental space for boats, travel trailers, and other vehicles for each 10 mobile home lots. 1 guest space for every 2 mobile home sites.
Emergency Shelter		1 space/10 beds
Transitional/Supportive Housing		1 space/bedroom plus 1 space/employee
Single-room Occupancy		1 space/bedroom plus 1 space/employee
Group Care Housing		2 stalls/client

Source: Firebaugh Zoning Ordinance, 2016.

Open Space and Park Requirements

The City requires open space to be set aside in the Mobile Home Park zone.

Conclusion

The development standards are typical for most Central Valley communities and do not pose any potential constraints to the development of affordable housing in Firebaugh.

Recommended Action

None required.

Typical Densities for Development

Firebaugh is a small rural city in Fresno County with the cities of Mendota to the south and Dos Palos to the north. The city of Madera is to the east of Firebaugh. Due to the distance to the nearest cities, outward growth in Firebaugh is not constrained by their proximity. Single-family residential areas vary in density from 4 to 8 units per acre. Multifamily densities are typically between 10 and 25 units per acre depending on the land use designation. In the previous planning period, no sites identified to accommodate the lower-income RHNA in the inventory were developed below the minimum allowable density of the zone in which they were located, and the City did not receive any requests to develop below the assumed capacity in the sites inventory.

Growth Management

Analysis

The City of Firebaugh does not have a Growth Management Ordinance. Action plans in the City's Land Use Element recommend the use of existing roadways, ditches, railroads, creeks, and other physical features to separate urban uses from existing agricultural operations as well as using open space to separate development from agricultural lands.

Recommended Action

None required.

Density Bonus

Analysis

As required by Government Code Section 65915, the City of Firebaugh maintains and administers a Density Bonus Ordinance to offer density bonuses and other incentives or concessions for the development of affordable housing. The density bonus is an increase over the otherwise maximum allowable residential density under the General Plan land use designation and zone. Density bonus percentages may range from 5 to 35 percent, depending on the percentage of low-income, very low-income, moderate-income, or large family housing units proposed for construction by a housing developer.

Government Code Section 65915 indicates that when an applicant seeks a density bonus for a housing development, the density bonus requirements are triggered when the residential development sets aside at least 10 percent of the total units as affordable to low-income households; at least 5 percent of the total units as affordable to very low-income households; or at least 10 percent of the total units as affordable to moderate-income households in a common interest for-sale development. Further, a density bonus request may be made when at least 10 percent of the units are designed as large family household units or all units are reserved for senior citizens, or for a mobile home park restricted to senior citizen residents. Finally, a density bonus can be requested when a developer of affordable housing provides a site of at least one acre for the development of housing for target groups.

Development concessions or incentives that may be provided by the City of Firebaugh include a reduction in site development standards; a modification of zoning code requirements (including a reduction in setbacks, square footage requirements, or parking spaces or architectural design requirements that exceed the minimum building standards); approval of mixed-use zoning in conjunction with the housing project if commercial, office, industrial, or other land uses will reduce the cost of the housing development and if such nonresidential uses are compatible with the project; or other regulatory incentives or concessions proposed by the developer or the City of Firebaugh that result in identifiable cost reductions. The number of incentives will be based on the following project affordability factors:

1. For projects with at least 5 percent very low-income, 10 percent lower-income, 10 percent moderate-income, or 10 percent large family units, one incentive or concession is required.
2. For projects with at least 10 percent very low-income, 20 percent lower-income, 20 percent moderate-income, or 20 percent large-family units, two incentives or concessions are required.
3. For projects with at least 15 percent very low-income, 30 percent lower-income, 30 percent moderate-income, or 30 percent large-family units, three incentives or concessions are required.

Conclusion

Firebaugh’s Density Bonus Ordinance is outdated and does not comply with current State law, which requires a density bonus up to 80 percent. In addition, the current ordinance does not provide a density bonus for a development with childcare facilities.

Recommended Action

The Housing Element includes **Program 20** to update the density bonus ordinance to comply with State law.

Zoning for a Variety of Housing Types

Analysis

Chapter 25 of the City of Firebaugh Municipal Code describes the City’s regulations for residential development. **Table 1C-19** summarizes the housing types permitted and conditionally permitted under the Zoning Ordinance.

TABLE 1C-19 RESIDENTIAL USES PERMITTED BY ZONE, FIREBAUGH

District Name	R-1, R-1-5, R-1-4.25	R-1 (TN), R-1-5 (TN), R-1-4.25 (TN)	R-2	R-3	Mobile Home Park (MHP)	UR	C-1 C-2 C-3
Single-Family Dwelling	P	P	P	P		C	
Multifamily			P	P			P
Mobile Home	P	P	P	P		C	
Mobile Home Park					C		
Employee Housing ¹ (6 or fewer)	P	P	P	P		P	
Emergency Shelter			C	P			
Transitional Housing	p ²	p ²	P	P			
Supportive Housing	p ³	p ³	P	P			
Single Room Occupancy			P	P			
Licensed senior-care housing facilities	C	C					
Licensed group care home (6 or fewer)			P	P			
Licensed residential care facility (6 or fewer)	P	P					
Licensed residential care facility (more than 6)	C	C					
Accessory Dwelling Units	P	P	P	P			

Source: City of Firebaugh Municipal Code, 2020. ADU ordinance, 2022.

P: Permitted, C: Conditional Use Permit.

¹Employee housing, subject to the issuance of a permit by the State of California Department of Housing and Community Development as provided in California Health and Safety Code Sections 17021.5 and 17030. The permit shall be prominently displayed in the housing unit and shall be provided to any peace officer, City inspector or State

inspector, upon demand.

²*Transitional housing permitted for six or fewer persons.*

³*Supportive housing permitted for six or fewer persons.*

Multifamily

The City of Firebaugh Zoning Code permits multifamily housing in the R-2 and R-3 districts to provide living areas within Firebaugh where development is consistent with the Firebaugh General Plan and is limited to medium- and high-density concentrations of multifamily dwellings along with other uses suitable to the intent of the zone. The City provides regulations for multifamily housing that are designed to promote the following principles.

- A suitable environment for family life, recognizing that a significant part of the multifamily population is adult, including senior citizens.
- Space for community facilities, including parks, schools, churches, and other facilities that will complement the residential environment.
- Attractive and unique development projects that encompass well-designed buildings with ample landscape and off-street parking.
- The conservation of valuable resources ranging from water to energy.
- Housing that is affordable to low- and moderate-income households and to households that have special housing needs.

Mobile Homes

The City defines a mobile home as a structure built on a permanent chassis and designed to be used as a single-family dwelling unit with or without a foundation. California Government Code Section 65852.3 requires jurisdictions to treat mobile or manufactured homes on a permanent foundation for permanent occupancy the same as single-family dwellings. They may not be excluded from lots zoned for single-family dwellings and are subject to the same rules as site-built homes, except for certain architectural requirements. Further, a jurisdiction may not require an administrative permit, planning or development process, or requirement that is not imposed on a conventional single-family dwelling.

In compliance with State law, the City’s Zoning Ordinance expressly permits mobile homes in all zones allowing single-family dwelling. Mobile homes are permitted by right in the R-1 zones, R-1 (TN) zones, and R-2 and R-3 zones. A mobile home park is permitted with a conditional use permit in the Mobile Home Park (MHP) zone. As defined by the City Zoning Code, a mobile home park includes three or more mobile homes or mobile home sites and may contain accessory facilities, administrative offices, and other accessory structures associated with mobile home parks.

The MHP zone allows a mobile home for every 2,400 square feet of lot area. For mobile home parks, 5 percent of the gross area of any mobile home park shall be designated open space. Other special requirements for the MHP zone are listed below.

- Each mobile home shall be connected to City water and sewer service.
- Each mobile home pad shall consist of a base material adequate to support a mobile home.
- All tongues and tow bars shall be removed once a mobile home is fixed to the lot.
- All mobile homes shall be fitted with skirting, extending from the floor level of the mobile home to the ground.
- An on-site manager shall be required for all mobile home parks containing 16 or more mobile home units.

Farmworker/Employee Housing

The City's agricultural uses, especially fruit trees and vineyards, may use seasonal labor. The American Community Survey (ACS), 2015-2020 (5-year estimates), estimates that there were 1,021 agriculture jobs in Firebaugh in 2020 (see Table 2-10 in the Regional Housing Needs Assessment). Since the ACS (2015-2020) indicates a high number of agricultural jobs in Firebaugh, there is potential demand for seasonal farm worker housing because Firebaugh is surrounded by agricultural land. By the nature of the profession, it is difficult to determine the number of seasonal farm laborers that may be working in the agricultural areas surrounding the city.

The City permits employee housing for up to six persons per dwelling in the R-1 (Single-Family Residential) zones, R-1 (Traditional Neighborhood) zones, and R-2 and R-3 zones, subject to density standards of the particular zone. The City also permits employee housing for up to 12 units or 36 beds in the UR (Urban Reserve) zone. Additionally, the City permits agricultural uses in industrial zones M-1 and M-2 and the Urban Reserve zone, but does not permit employee housing in the industrial zones.

Emergency Shelters

The Zoning Code currently permits emergency shelters by right without a conditional use permit in the R-3 zone. Emergency shelters are permitted with a conditional use permit in the R-2 zone. In accordance with Assembly Bill (AB) 2339 (2022), the Housing Element must identify potential sites for emergency shelters within zones that allow residential uses by right. There are 18 potential vacant sites with a total of 8.61 acres in the R-3 zone, listed in **Table 1C-20**, that could provide a year-round shelter. The R-3 zone is close to services, including grocery stores and medical facilities, and has access to transportation.

TABLE 1C-20 POTENTIAL EMERGENCY SHELTER SITES, R-3 ZONING

APN	Acreage
00711045	0.17
00711037	0.35
00711039	0.18
00711022	0.38
00711040	0.44
00711025	0.15

APN	Acreage
00711030	0.55
00711066	0.23
00711055	0.14
00711012	0.14
00711008	0.15
00711064	0.19
00712009	2.95
00712013	0.12
00712017	0.12
00712018	2.24
00712019	0.12
00711045	0.17
Total	8.61

Source: County of Fresno, 2022 and City of Firebaugh, 2023.

Low Barrier Navigation Centers

The City’s Zoning Code does not currently include a provision for Low Barrier Navigation Centers.

Transitional and Supportive Housing

The City permits transitional and supportive housing in all residential districts. Transitional and supportive housing are permitted by right for six or fewer persons in the R-1 and R-1 (TN) zones. The R-2 and R-3 zones also permit transitional and supportive housing by right.

Single Room Occupancy Units

The City defines supportive housing as housing with no limit on length of stay; that is occupied by the target population as defined in Subdivision (d) of Section 53260 of the Health and Safety Code; and that is linked to on-site or off-site services that assist the supportive housing resident to retaining the housing, improve his or her health status, and maximize his or her ability to live and, when possible, work in the community. This housing may include apartments, single-room occupancy residences (SRO), or single-family homes.

State law requires supportive housing be permitted by right in multifamily zones and mixed-use and nonresidential zones allowing multifamily. The City permits SROs by right in the R-2 and R-3 zones; therefore, the City makes adequate provisions for SRO units.

Residential Care Facilities

The City permits licensed residential care facilities for six or fewer residents by-right in residential zones R-1 and R-1 (TN). Licensed residential care facilities for seven or more residents are permitted with a conditional use permit in the R-1 and R-1 (TN) zones. In addition, a licensed group care home for six or fewer residents are permitted by right in the R-2 and R-3 zones.

Accessory Dwelling Unit

State legislation requires jurisdictions to allow accessory dwelling units (ADUs) that meet certain standards by right anywhere that single-family or multifamily uses are allowed.

The City defines a second residential unit as a second dwelling unit that may be a site-built structure or a manufactured home as defined by Section 18007 of the Health and Safety Code, provided that mobile homes, trailers, and recreational vehicles are not permitted to be used as a second dwelling unit. One second dwelling unit may be established as an addition to an existing residential dwelling unit or as a separate, freestanding dwelling unit, consistent with development standards of the zone in which the unit is located and with the requirements of the ADU subsection of the Municipal Code.

The City permits ADUs by right in the R-1 and R-1 (TN) zones but does not allow ADUs on lots zoned R-1-4.5 or R-1-5 or any other zone district. The Zoning Code does not comply with State law and will be updated to permit ADUs in the R-1-4.5 and R-1-5 zones and in residential and commercial zones R-2, R-3, C-1, C-2, and C-3, which permit multifamily and mixed use by right.

A second dwelling unit in the City of Firebaugh must comply with the following development standards:

1. Minimum lot size: A second dwelling unit shall be permitted only on a properly zoned lot that contains at least 6,500 square feet.
2. Yards: A second dwelling unit shall comply with yard requirements of the R-1 Zone, as listed in Section [25-15](#), R-1 Zone: Conventional Single-Family Residential Zones.
3. Space between buildings: A second detached dwelling unit shall be located no closer than 10 feet to any other residential building on the same parcel, and not less than 6 feet from any accessory building.
4. Building height: No second dwelling unit shall have a height greater than two stories, not to exceed 25 feet.
5. Lot coverage: The total lot coverage by a second dwelling unit and all other buildings and structures shall not exceed 30 percent of the total lot area.
6. Unit size: The increased living area of a second dwelling unit that is attached to the primary dwelling shall not exceed 30 percent of the existing living area of the primary dwelling. A second unit that is detached from the primary dwelling shall not exceed 1,300 square feet of floor area.

7. **Parking:** There shall be one paved on-site parking space for a second dwelling unit. The space shall be a minimum of 9 feet wide and 20 feet deep and constructed to City standards. The space shall be in addition to on-site parking spaces required for the primary dwelling on the lot. The parking space for the second dwelling unit may be situated as a tandem parking space within an existing driveway, provided that parking space requirements are maintained for the primary dwelling unit. If additional paved parking is required to accommodate a second unit, it shall not be located within a required front yard, except within a legal driveway that is not wider than necessary to accommodate two parking spaces side by side; however, said parking space may be located within required side or rear yards. There shall be no conversion of a garage of a primary dwelling unit into a second dwelling unit unless all parking requirements are otherwise met for the primary dwelling unit.
8. **Architectural appearance:** The second dwelling unit's scale, appearance, and character shall be similar to and compatible in design with the primary dwelling unit in terms of siding materials and color, window types, roofing pitch, and materials. Further, the second dwelling unit shall be clearly subordinate to the primary dwelling unit by size, location, and appearance. If attached to the primary dwelling unit, a second dwelling unit shall be attached in a manner that the addition will create the appearance of an enlargement of the primary dwelling unit, and a logical extension of roof and walls of the primary dwelling unit, rather than give the appearance of an add-on unit.
9. **Building Code:** A second dwelling unit shall be subject to all applicable building, fire, health, and safety codes.
10. **Occupancy:** The owner of the subject property at the time of the application and all future owners of the property shall reside in one of the dwelling units. A covenant, in a form approved by the City Attorney, running with the land between the City and the applicant shall be recorded with the Fresno County Recorder's Office prior to the issuance of any building permits, requiring that the primary or proposed second dwelling unit shall be occupied by the owner of the property.
11. **Access:** In order to preclude the appearance of a duplex unit, access to the second dwelling unit shall be by an exterior doorway on the side or rear of the second dwelling unit. In no case shall the entrance be visible from a public street right-of-way.
12. **Utilities:** A second dwelling unit shall be provided with water, sewer, and other utilities as determined by the building official.
13. **Existing dwellings:** Any second dwelling unit existing on the effective date of the ordinance adding this subsection shall constitute a violation of this subsection unless the second dwelling unit meets the standards of this subsection or the second dwelling unit qualifies as a permitted nonconforming use under Section [25-61](#), Nonconforming Uses and Structures, of the Municipal Code.

Conclusion

The City provides zoning for a variety of housing types; however, the Zoning Ordinance needs to be amended to fully comply with State law requirements for all housing types, including employee housing, standards for emergency shelters, low barrier navigation centers, transitional and supportive housing, residential care facilities, and ADUs.

Recommended Action

The Housing Element includes **Program 20** to amend the Zoning Ordinance to address development standards and barriers for special-needs housing:

- **Employee and Farmworker Housing:** Clarify the definition of employee housing in the zoning code to permit farmworker housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type in the same zone across all zones that allow single-family residential uses.
- **Emergency Shelters:** Develop managerial standards for emergency shelters pursuant to Government Code Section 65583(a)(4)(A).
- **Low-Barrier Navigation Centers:** Permit low-barrier navigation centers by right in zones where mixed uses are allowed or in nonresidential zones that permit multifamily housing (Government Code Section 65662).
- **Transitional and Supportive Housing:** Permit the transitional and supportive housing types pursuant to Government Code Section 65583 to be treated as residential uses and subject only to restrictions that apply to other residential uses of the same type in the same zone. Additionally, allow supportive housing in multifamily and mixed-use zones (Government Code Section 65651 [AB 2162]).
- **Residential Care Facilities/Group Homes:** Allow residential care facilities and group homes for six or fewer persons in accordance with Health and Safety Code Section 1568.0831, and allow residential care facilities, regardless of size, in all zones that permit residential uses of the same type, in accordance with the City's definition of family.
- **Accessory Dwelling Units:** Allow ADUs pursuant to subdivision (e) of Government Code section 65852.2 in any residential or mixed-use zone, including C-1, C-2, C-3, and UR, in compliance with Government Code Section 65852.2(a)(1). To ensure development standards are not a constraint to the development of ADUs, the City will also amend the development standards in accordance with Government Code Sections 8899.50, 65583(c)(10), and 65583.2(a).

On- and Off-Site Improvement Standards

Analysis

Improvement standards are regulated by the City of Firebaugh 2008 Improvement Standards and Chapters 13 and 25 of the Municipal Code. Site improvements include roadways, sidewalks, curbs and gutters, and other public infrastructure. The standard plans and specifications are prepared by the City Engineer and are adopted as the official standard plans and specifications for the City, but if any developer or contractor proposes a modification or variance from the standard plans and specifications, the City may authorize a variation.

Any changes in the neighborhood that would result from traffic generated by the development undergoing site plan or design review may require land dedication and/or street improvements. Should the Commission find that approval of the proposed development combined with existing traffic in and near the subject property warrant road improvements, the Commission may require conditions, including right-of-way dedication, to facilitate roadway improvements; installation of roadway improvements (including curbs, gutters, sidewalk, and street pavement); and nonroadway improvements such as signage, lighting, bus stops, and street trees.

All improvements shall be constructed and installed to City standards and shall be installed at the time of development. Where it is determined by the Planning Commission that it is impractical to install certain or all improvements at the time of development, an agreement to make such improvements may be accepted in lieu thereof.

Conclusion

These off-site standards do not act as an impediment to the production of housing for lower-income households. From the City's vantage point, these improvements are necessary to ensure that Firebaugh is built in a manner that benefits residents of the subdivision and the city as a whole.

Recommended Action

None required.

Fees and Exactions

Analysis

Planning Fees

Although planning processing fees contribute to the total cost of housing development, and therefore the cost of housing, they generally are not considered a significant cost factor. The City of Firebaugh collects processing fees for several different types of planning permits, including subdivision maps, annexations, conditional use permits, site plan review, environmental review, general plan amendments, zone changes, variances, and others. The fees have been calculated so as to reimburse the City for its actual processing costs and have also been evaluated in comparison to fees charged by neighboring jurisdictions. Fees are listed on individual application forms, which

are available on the City’s website.

Analysis shows that Firebaugh's planning fees are comparable with neighboring cities. Firebaugh’s current planning fees are detailed in **Table 1C-21**.

TABLE 1C-21 FIREBAUGH PLANNING FEES

Category	Fee
Site Plan Review	\$1700
Conditional Use Permit	\$1765
Variance	\$960
Minor Deviation	\$85
Tentative Subdivision Map	\$5010
Final Subdivision Map	\$3595
Tentative Parcel Map	\$2060
Final Parcel Map	\$2750
Lot Line Adjustment	\$1685
Lot Merger	\$1510
Zone Change	\$1865
General Plan Amendment	\$1470
Annexation	\$3800
Negative Declaration	\$2555
EIR	\$550 deposit plus actual cost

Source: City of Firebaugh Application Forms. Current as of February 2023.

Development Impact Fees

Development impact and building permit fees typically constitute a larger percentage of housing costs than do the planning permit fees discussed above. Development impact and building permit fees pay the capital costs of public facilities that serve a project, such as:

- Water
- Sanitary sewer
- Storm drainage
- Parks
- Public safety

In addition, regional impact fees are assessed by the Firebaugh-Las Deltas Unified School District to provide for the construction of new educational facilities, and by the Fresno County Joint Powers Authority and Fresno County Council of Governments. These fees are beyond the control of the City.

Firebaugh most recently updated its impact fees in 2021. The current fee list is shown in **Table 1C-22** and displays fees for both single- and multifamily development. A schedule of these fees is posted on the City’s website.

TABLE 1C-22 DEVELOPMENT IMPACT FEES FOR SINGLE- AND MULTIFAMILY RESIDENTIAL DEVELOPMENT

	Traffic	Fire	Police	Storm Drain	Wastewater	Water	Parks & Rec.	Admin.	Total Fees
Single-Family Residential	\$1,007	\$951	\$740	\$895	\$1,847	\$1,571	\$4,133	\$334	\$11,479
Multifamily Residential	\$584	\$761	\$592	\$716	\$1,477	\$1,257	\$3,607	\$261	\$8,955

Source: City of Firebaugh, March 2023.

Developers are also required to pay impacts fees to the Firebaugh-Las Deltas Unified School District for the construction of educational facilities. The School district’s fee for residential development is currently \$4.08 per square foot. All cities in Fresno County are also required to levee the Fresno County Council of Government’s Regional Transportation Mitigation Fees against new development. This fee is \$1,637 for market-rate single-family homes, \$818 for affordable single-family homes, \$1,150 for market-rate multifamily units, and \$575 for affordable multifamily units. The Fresno County Joint Powers Agency requires an additional regional transportation mitigation fee of \$2,118 per unit for single-family dwellings and \$1,642 for multifamily units. These impact fees are regional in nature; as such, they do not create a unique barrier to development in Firebaugh.

Fees for a Typical Single-Family Dwelling

The total planning and impact fees for a typical single family dwelling are shown in **Table 1C-23** below.

TABLE 1C-23 FEES FOR TYPICAL SINGLE FAMILY UNITS

Single Family Unit	Amount
City and Regional Impact Fees Per Unit	\$11,479 (city impact fees) \$4.78 per square foot (Firebaugh/Las Deltas Unified School District) \$2,118 per unit (Fresno County Joint Powers Agency impact fee)
Total Fees Per Unit	\$23,157

Source: City of Firebaugh, 2023. Assumes a 2,000 square foot house.

Fees for a Typical Multi Family Dwelling

The total planning and impact fees for a typical multi family dwelling in a typical apartment complex are shown in **Table 1C-24** below.

TABLE 1C-24 FEES FOR TYPICAL MULTIFAMILY UNITS

Multi Family Unit	Amount
Planning Fees for Project	\$890
City and Regional Impact Fees Per Unit	\$8,955 (city impact fees) \$4.78 per square foot (Firebaugh/Las Deltas Unified School District) \$1,642 per unit (Fresno County Joint Powers Agency impact fee)
Total Fees Per Unit	\$96,637

Source: City of Firebaugh, 2023. Assumes a 20-unit building.

Conclusion

City development impact fees are an estimated 7 to 9 percent of the total development costs for both single-family and multifamily development. These fees are similar to or lower than many other communities in the region. The City makes every effort to work with developers to offset the cost of fees.

Recommended Action

None required.

Processing and Permit Procedures

Analysis

Firebaugh provides in-house building inspection services and contracts with consultants for planning and engineering services. The City also retains a consultant for grant writing services, assisting with the pursuit of critical funding for housing and public works projects.

Because of the limited number of planning and development requests that are typically submitted to Firebaugh, processing of these applications usually begins within days of receiving the application. A typical single-family residential subdivision will require about six months to process, from submittal of application to filing of final subdivision map with the Fresno County Records Office. Each processing phase of a typical residential subdivision is listed in **Table 1C-25** with the amount of time required to process each phase. Subdivision applications that require an annexation typically add three months to the processing time.

TABLE 1C-25 TYPICAL RESIDENTIAL SUBDIVISION PROCESSING

Processing and Permit Procedures	Timing
Applicant submits residential subdivision with processing fee and forms filled out, including environmental assessment form.	-
Review application for completeness.	2 weeks
Prepare and circulate environmental analysis.	6 to 8 weeks*
Prepare report to Planning Commission on subdivision and environmental document.	1 week*
Prepare and publish public hearing notices.	2 weeks*
Planning Commission meets on subdivision.	-
Prepare City Council staff report/resolutions/environmental document.	1 week.
Schedule City Council for approval of subdivision and environmental document (including publishing public hearing notices).	3 weeks*
City Council hearing on subdivision.	4 weeks
Applicant's engineer prepares improvement plans and final subdivision map.	4 weeks
City Engineer reviews improvement plans and final subdivision map.	4 weeks
Prepare final subdivision staff report for City Council.	2 weeks*
City Council approves final subdivision map.	8 weeks after tentative map approval
City records final subdivision map with county recorder's office.	1 week

Source: City of Firebaugh, 2023

* Asterisks denote tasks that typically overlap with other tasks.

Multifamily residential developments proposed in Firebaugh require Site Plan Review. This typically involves review and action by the Planning Commission—a public hearing is not required. For a Site Plan Review, the processing procedures and timelines usually required are shown in **Table 1C-26**.

TABLE 1C-26 TYPICAL MULTIFAMILY PROCESSING AND PERMIT PROCEDURES

Processing and Permit Procedures	Timing
Applicant submits application with processing fee and forms filled out.	-
Review application for completeness.	1 week
Prepare staff report.	2 weeks
Planning Commission holds meeting for Site Plan Review. Any decision of the Planning Commission may be appealed to the City Council.	4 weeks

Source: City of Firebaugh, 2023

Firebaugh’s Site Plan Review process for multifamily residential development is very straightforward; it is not considered a constraint to new development. The City reviews applications to ensure that projects meet basic zoning standards (listed in **Table 1C-19**, including setbacks, parking, and landscaping) and right-of-way improvements (including curb, gutters, sidewalks, and lighting), and that infrastructure is available (water, sewer and storm drainage improvements). If a project does not meet basic standards, the applicant is informed and instructed to revise plans accordingly (or where applicable, to apply for a Variance to adjust the subject standard).

Site Plan/Design Review Process

Certain development applications in the City of Firebaugh are subject to a design review process, as defined in Chapter 25 of the City's Zoning Code. The purpose of the site plan/design review process is to enable the Planning Commission to make a finding that the proposed development is in conformity with the intent and provisions of the Zoning Code and to guide the building department in the issuance of building permits. The site plan/design review process is intended to ensure that development constructed in Firebaugh meets good urban design standards; does not have an adverse impact on neighboring properties; does not impact the public health, safety, and welfare; and produces a development that will enhance the image and marketability of Firebaugh. Single-family dwellings are not subject to design review.

Upon submission of an application for a site plan/design review permit, the Planning Department prepares a report that must make findings that:

- a. The location of the proposed use is in accordance with the purpose and objectives of the Zoning Code and the purposes of the district in which the subject site is located.
- b. The design of buildings and other improvements complies with applicable design guidelines for the zone in which the project is located.
- c. The location of the proposed use and the conditions under which it would be operated or maintained will not be detrimental to the public interest, health, safety, convenience, or welfare, or be materially injurious to properties or improvements in the vicinity.
- d. The proposed use will not have a significant impact on the environment.
- e. The proposed use will comply with applicable provisions in this ordinance.
- f. The proposed use is consistent with the Firebaugh General Plan.
- g. The site for the proposed use is adequate in size, shape, and location to accommodate the use for which it is proposed.

This report is reviewed by the Planning Commission, which then takes action to approve, approve with conditions, or deny the site plan/design review permit based on the finding.

Senate Bill 330

The City does not currently have a process in place to address SB 330.

Senate Bill 35

The City does not currently have a process in place to address SB 35.

Annexation Process

Lands outside Firebaugh City limits but within the Sphere of Influence are typically designated for future development by the Land Use Element of the Firebaugh General Plan. This includes residential development. At an appropriate time, these lands may be considered for annexation into the City. Annexations typically involve several levels of government review, including the City, the County, and Fresno Local Agency Formation Commission (LAFCo).

In Fresno County, cities have a Memorandum of Understanding with the County (and LAFCo) that includes standards for annexation. One of the key standards is that a site proposed to be annexed must have an approved project on at least half of its acreage. For example, a 40-acre site proposed for annexation must have a development project that has received approval from the City on at least 20 acres—such as a tentative subdivision map, site plan review, or conditional use permit. This requirement has been thought to pose a constraint to development in the past, but negotiations among the cities and County have not resulted in any amendments to the policy. The policy has a number of benefits, including that it precludes the premature consumption of agricultural lands. The City of Firebaugh has not experienced difficulties with the annexation process.

Conclusion

As a small city with limited development, Firebaugh does not experience the backlogs in development that are typical in many larger jurisdictions. Small projects, such as single-family units, may receive over-the-counter approval with a simple site plan. Review and approval timelines at the City are relatively rapid, and processing timelines are not generally considered a constraint to development in the city. The City does not currently have a process in place to address SB 330 or SB 35.

Recommended Action

The City has included Program 24 to establish an application process related to SB 330 and SB 35 and will make the preliminary application available on the City’s website. Through Program 25 the City will develop objective design guidelines and standards to provide clear and objective standards related to single-family, multifamily, and mixed-use residential developments.

Building Codes

Analysis

Building codes regulate the physical construction of dwellings and include, for example, the plumbing, electrical, and mechanical codes. Firebaugh follows the 2022 California Building Code (CBC) as established by State law and as such, has little control over State standards. There have been no local amendments to the UBC.

Building codes are enforced by the Firebaugh Building Department through plan check and inspections. Inspections normally occur as a result of building permits for new construction, remodels or rehabilitations. Other inspections may result from requests from individuals for assessments of building quality or from enforcement complaints or when the inspector notices construction occurring without permits. The City has its own in-house

building department processing and inspection staff—a switch from recent years when the City contracted for building services. However, the City still contracts for plan checking services.

Conclusion

The City has not made any local amendments to the Code that would impact the cost of housing.

Recommended Action

None required.

Constraints on Housing for Persons with Disabilities

Analysis

California Building Code

As previously stated, the City follows the 2019 California Building Code. The code provides the minimum standards for accessibility. There are currently no amendments to the Building Codes that would diminish the ability to accommodate persons with disabilities or affect accessibility.

Definition of Family

Section 25-67.3 of the Firebaugh Zoning Ordinance defines family as:

One person or two or more individuals living together sharing household responsibilities and activities, which may include, sharing expenses, chores, eating evening meals together and participating in recreational activities and having close social, economic and psychological commitments to each other.

Zoning and Land Use Policies

Separation Requirements. The City’s municipal code does not impose any separation requirements.

Site Planning Requirements. The City’s municipal code does not impose site planning requirements for supportive housing and community care facilities.

Reasonable Accommodation

The City of Firebaugh administers the Reasonable Accommodation Ordinance, pursuant to the federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act, to provide individuals with disabilities reasonable accommodation in rules, policies, practices, and procedures to ensure equal access to housing. The Ordinance establishes a procedure for making requests for reasonable accommodation in land use, zoning, and building regulations. An application for reasonable accommodation is made to the Planning Department, and the Planning Director can approve, approve with conditions, or deny the application.

Reasonable accommodation applications are processed as an administrative matter. Following a decision by the Planning Director, an administrative resolution is prepared that outlines the findings and conditions of the decision. The decision shall be made within 30 days of receiving the application. The Planning Director shall render a decision based on the following findings.

- a. Whether the housing, which is the subject of the request for reasonable accommodation, will be used by an individual with disabilities protected under fair housing laws.
- b. Whether the requested accommodation is necessary to make housing available to an individual with disabilities protected under the fair housing laws.
- c. Whether the requested accommodation would impose an undue financial or administrative burden on the City.
- d. Whether the requested accommodation would require a fundamental alteration in the nature of the City's land use and zoning or building program.
- e. In granting a request for reasonable accommodation, the reviewing authority may impose any conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation will comply with these findings, including the following:
 1. Inspection of the property periodically, as specified, to verify compliance with this section and any conditions of approval.
 2. Removal of the improvements, where removal could not constitute an unreasonable financial burden, when the need for which the accommodation was granted no longer exists.
 3. Time limits and/or expiration of the approval if the need for which the accommodation was granted no longer exists.
 4. Recordation of a deed restriction requiring removal of the accommodating feature once the need for it no longer exists.
 5. Measures to reduce the impact on surrounding uses.
 6. Measures in consideration of the physical attributes of the property and structures.
 7. Other reasonable accommodations that may provide an equivalent level of benefit and that will not result in an encroachment into required setbacks, exceed the maximum height, lot coverage, or floor area ratio requirement specified for the zone district.
 8. Other conditions necessary to protect the public health, safety, and welfare.

Conclusion

The City's Reasonable Accommodation procedure does not present a barrier to development or to the provision of housing for persons with disabilities.

Recommended Action

Through **Program 21** the City will encourage the inclusion of mobility-impaired accessibility features into

housing developments and will advertise the reasonable accommodations process. The City will also update its current definition of family as part of Program 20.

At-Risk Analysis

As required by California Government Code Section 65583, the Housing Element must analyze the extent to which below-market rate units are at risk of converting to market-rate housing. If there are at-risk units, the element should include programs to encourage preservation of these units or to replace any that are converted to market rate. The units to be considered are any units that were constructed using federal assistance programs, state or local mortgage revenue bonds, redevelopment tax increments, in-lieu fees or an inclusionary housing ordinance, or density bonuses. Housing is considered “at risk” if it is eligible to be converted to market-rate housing due to: (1) the termination of a rental subsidy contract, (2) mortgage prepayment, or (3) the expiration of affordability restrictions. The time period applicable in making this determination is the 10-year period following the last mandated update of the Housing Element, which, in the case of all Fresno County jurisdictions, is December 31, 2023. As shown in **Table 1C-27**, there are 158 assisted affordable units in Firebaugh as of September 2022, and none are at risk of expiring in the next 10 years. None of the units receiving government subsidies in Firebaugh were listed as having submitted a notice of their intent to convert their subsidized units to market rate through the California Department of Housing and Community Development.

TABLE 1C-27 ASSISTED HOUSING DEVELOPMENTS, FIREBAUGH

Name	Address	Population Served	Funding Source	# of Units	# of Affordable Units	Affordable Units Expiration	Risk Level
San Joaquin Vista Apartments	500 P Street	Large Family	LIHTC	48	47	2053	Not at risk
Firebaugh Garden Apartments and Mendota Village Apartments (Site 1)	600 P Street	Large Family	LIHTC, USDA	84	82	2072	Not at risk
Firebaugh Gateway	1264 P Street	Senior	LIHTC	30	29	2069	Not at risk
Total				162	158		
Total At Risk				--	0		

Source: California Housing Partnership, 2022.

Though no units are considered to be at risk during the next ten years, should one of the above affordable projects convert affordable units to market-rate unexpectedly through termination of a rent subsidy contract or mortgage prepayment, there would be three methods to preserve the at-risk units: acquisition and rehabilitation, replacement, or a rent subsidy.

Acquisition and Preservation

The factors that must be used to determine the cost of preserving low-income housing include property acquisition, rehabilitation, and financing. Actual acquisition costs depend on several variables, such as condition, size, location, existing financing, and availability of financing (governmental and market). Looking at multifamily buildings throughout Fresno County, prices ranged from \$120,000 per unit for a 10-unit complex in Fresno to just over \$258,000 per unit for a 6-unit complex in Clovis. Based on these estimates, replacing the smallest of the three assisted projects by acquiring 29 new units could cost between \$3.5 million and \$7.5 million. Additionally, if the property needs significant rehabilitation or financing is difficult to obtain, it is important to consider these factors in the cost analysis.

Replacement

While recent construction cost estimates in Firebaugh were not available, a developer working in Kerman estimated that new construction projects cost approximately \$240 per square foot, not including the costs of buying land or providing off-street parking. For a 1,000-square-foot unit, this would be a cost of \$240,000.

To replace the 29 units in the smallest of the three assisted projects in Firebaugh, construction would cost an estimated \$7 million plus the cost of land, parking, and other soft costs.

Rent Subsidy

Housing affordability can also be preserved by seeking alternative means of subsidizing rents, such as Tenant Protection Vouchers, a subset of the HCV program described previously. Under HCVs, HUD pays the difference between what tenants can pay (defined as 30 percent of household income) and what HUD estimates as the fair-market rent on the unit. Based on HUD's 2022 fair-market rents, the subsidy needed to preserve a one-bedroom unit at an affordable rent for a three-person household with an extremely low-income would be an estimated \$328 per month, or \$3,939 per year. For 30 years, the subsidy would be about \$118,170 for a three-person household. Subsidizing every assisted unit in the smallest of the assisted buildings at an extremely low-income rent for 30 years would cost between an estimated \$8.3 million.

The subsidy needed to preserve a one-bedroom unit at an affordable rent for a three-person household with a very low-income would be an estimated \$27 per month or \$318 per year. For 30 years, the subsidy would be about \$9,540 for a three-person household. Subsidizing every assisted unit in the smallest of the assisted buildings at a very low-income rent for 30 years would cost approximately \$276,660. Based on 2022 household income limits, a three-person household in the low-income range would not require subsidy to afford the fair-market rent.

Conclusion

Though no units are considered at risk during the next ten years, rent subsidy would potentially present the most cost-effective means of preserving affordability.

SECTION 1C-5: REVIEW OF PAST ACCOMPLISHMENTS

California Government Code Section 65588 says,

Each local government shall review its housing element as frequently as appropriate to evaluate all of the following: (1) The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal. (2) The effectiveness of the housing element in attainment of the community’s housing goals and objectives. (3) The progress of the city, county, or city and county in implementation of the housing element. (4) The effectiveness of the housing element goals, policies, and related actions to meet the community’s needs, pursuant to paragraph (7) of subdivision (a) of Section 65583.

Progress Toward the RHNA

Each jurisdiction in California is responsible for accommodating its share of the region’s housing needs. The process of determining each jurisdiction’s share of housing needs is called the Regional Housing Needs Assessment (RHNA). The RHNA projection period for the previous Housing Element was from December 31, 2015, to December 31, 2023. The City of Firebaugh was assigned a RHNA of 712 units, divided into four income categories:

- 128 very low income (less than 50 percent of the area median income [AMI])
- 169 low income (50 to 80 percent of the AMI)
- 204 moderate income (80 to 120 percent of the AMI)
- 211 above moderate income (greater than 120 percent of the AMI)

Table 1C-28 summarizes the City’s accomplishment in meeting the RHNA during the 5th cycle RHNA projection period.

TABLE 1C-28 UNITS BUILT DURING 2015-2023 RHNA PROJECTION PERIOD, FIREBAUGH

Income Category	2015–2023 RHNA	2015–2022 Building Permits Issued	Percentage of RHNA Accomplished
Very Low	128	0	0%
Low	169	2	1%
Moderate	204	5	2%
Above Moderate	211	41	19%
Total	712	48	7%

Source: City of Firebaugh, 2023.

Efforts to Address Special Housing Needs

California Government Code Section 65588 requires that local governments review the effectiveness of the housing element goals, policies, and related actions to meet the community’s special housing needs. As shown in the Review of Previous 2015-2023 Housing Element Programs matrix (**Table 1C-30**), the City worked diligently to continuously promote housing for special-needs groups in a variety of ways.

- The City continues to promote the Reasonable Accommodations Ordinance for persons with disabilities. The City permits improvements that serve persons with a disability that might otherwise require a variance. Improvements may include carports, garages, wheelchair ramps, ramp railings, porches, etc. The City continues to promote the no-cost permit through distribution of a brochure made available at City Hall and on the City’s website.
- The City requires that all ground-floor multifamily housing meet state and federal accessibility requirements through its Site Plan Review and building permit processes. The Rio Villas senior apartments (completed in 2017) features 30 handicap-accessible senior apartments. In 2019, the City approved the 56-unit Del Rio Place apartments. Compliance with all state and federal accessibility requirements was confirmed through the review process.

Implementation of Housing Element Programs

Table 1C-29 summarizes the programs from the 2015-2023 Housing Element. To the degree that such programs are recommended to be continued in the current Housing Element, these programs are reorganized and presented in **Section 1C-1, Action Plan**.

TABLE 1C-29 EVALUATION OF 2015–2023 HOUSING ELEMENT

Program	Implementation Status	Recommendation
<p>A1. HOME Funding. Firebaugh will encourage and work with qualified housing entities to submit an application for funds under the HOME Program on behalf of the City. The City could in turn assist first-time homebuyers by deferring or reducing development impact fees. This program provides financial assistance to low- to moderate-income families for the purchase of newly constructed homes or existing homes. Other groups that could be assisted with rental housing include Extremely Low Income and disabled residents. The City Planner and City Manager will work with a qualified housing entity to identify appropriate building sites.</p>	<p>The City was awarded HOME funds in 2020. However, no applications for funding were received by the City during the planning period. The City will continue to market the program and does so typically with announcements on the City’s website and by working with local developers.</p>	<p>Continued as Program 8.</p>
<p>A2. In-Fill Development. Firebaugh will promote the development of affordable housing units on “in-fill” residential lots, some of which may have originally contained dilapidated homes that have been demolished. The City Planner and Building Department will identify appropriate lots for this program. To promote such development, the City may consider deferring or reducing impact fees for affordable units.</p>	<p>To ensure a variety of housing types, the City approved an 8-unit multifamily complex on Landucci Drive that was completed in 2018. In 2019, the City approved a multifamily residential complex on an infill site (Del Rio Place, 56 units). However, no reduction of impact fees was requested. In 2020, the City approved the redevelopment of the 34-unit Firebaugh Family Housing project (owned by the Housing Authority) into a 68-unit project. The City maintains a map for interested parties showing available sites for housing projects.</p>	<p>Deleted.</p>
<p>A3. Planned Development Zone. The City of Firebaugh will continue to encourage private developers who are proposing residential development to seek a P-D (Planned Development) zone district. These districts allow for greater flexibility in residential design and better utilization of land. These opportunities allow the developer to potentially provide a more affordable housing product. The City will prepare an informational brochure that explains the standards and procedures for this zone.</p>	<p>No projects were proposed during the planning period that expressed a desire to utilize the PD zone. The City has not yet prepared or distributed a brochure regarding the Planned Development zone.</p>	<p>Continued as Program 11.</p>
<p>A4. Density Bonus. The City of Firebaugh will encourage developers to apply for a density bonus for qualified projects. The City adopted its own density bonus ordinance in 2015 but prior to that processed density bonus applications through the State’s density bonus law. The ordinance provides that a density bonus may be granted for projects that agree to limit residency to qualified households, including low-income and the elderly. In addition to granting a density bonus of up to 35 percent, the City must also grant at least one additional development standard</p>	<p>In 2020, the City approved a 26% density bonus for the Firebaugh Family Housing project, proposed by the Fresno Housing Authority. The project was approved to redevelop an existing 34-unit Housing Authority project constructed during the 1970s into a new project with 68 units. The density bonus provided 14 more units than allowed by the zoning of the site. The City has not yet prepared or distributed a brochure regarding the density bonus ordinance.</p>	<p>Modified, part of Program 20.</p>

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Program	Implementation Status	Recommendation
concession – such as reduced building setbacks, for instance. The City will also prepare a brochure that explains the development bonus ordinance.		
<p>A5. Housing Authority. The City of Firebaugh will support the Fresno County Housing Authority's implementation of the conventional Public Housing Rental Program and the Section 8 Existing Program, which provides rent subsidies directly to participating landlords, and will support that Agency's attempts to secure additional funding for expanded programs. As noted previously the City recently approved a 30-unit senior housing project proposed by the Housing Authority. Currently, the Housing Authority manages 152 dwelling units in addition to privately-owned Section 8 housing units in Firebaugh.</p>	<p>The City supports activities of the Housing Authority (which operates 152 units in Firebaugh) on an ongoing basis. In 2019, the City approved a permit for a 56-unit multifamily residential complex, Del Rio Place, that may offer units to Section 8 voucher holders.</p>	<p>Continued as Program 29.</p>
<p>A6. Farmworker Housing. The City will seek to identify a development partner for a farmworker housing project to develop affordable housing for farmworkers. The City will support the project by expediting approval and consideration of deferral or reduction of impact fees will be given. Granting of a density bonus (under the City's density bonus ordinance) could also help improve the feasibility of this type of development.</p>	<p>The City has not been able to identify a partner for the construction of farmworker housing. However, the Housing Authority operates the 98-unit Maldonado Plaza, one of the few farmworker housing complexes in Fresno County.</p>	<p>Continued as Program 12.</p>
<p>A7. Large Family Households. As noted in Chapter 5, Firebaugh has a high number of large family households – signifying a potential overcrowding problem. The City will encourage residential developers to consider including four or more bedrooms in future development projects to address this need. As an incentive, the City may consider deferring or reducing development impact fees for these projects.</p>	<p>In 2019, the City approved a 131-lot subdivision, Greystone Estates, that offers seven different floor plans, including homes with four and five bedrooms. As of 2020, the subdivision was under construction, and construction of many homes has been completed.</p>	<p>Deleted.</p>
<p>A8. Special Housing Opportunities. The City will seek to identify a development partner such as Habitat for Humanity and/or Self Help to develop housing projects for lower income families. The City may consider deferring or reducing processing or impact fees for qualified affordable housing projects.</p>	<p>The City partnered with the Housing Authority in 2017 to complete the 30-unit Rio Villas senior housing. The City is currently in negotiations with Habitat for Humanity to complete 11 lots in the partially developed San Joaquin Villas single-family residential Planned Unit Development on N. Dos Palos Road to develop additional units on a parcel to the south.</p>	<p>Modified, part of Program 13.</p>

Program	Implementation Status	Recommendation
<p>B1. Promote the City’s Reasonable Accommodations Ordinance for Persons with Disabilities. Firebaugh adopted a “Reasonable Accommodations Ordinance” (as a result of the previous Housing Element) to permit improvements that serve persons with a disability, that might otherwise require a Variance - including carports, garages, wheelchair ramps, ramp railings, porches (that encroach into setback areas) and others. The City will promote this no-cost permit through preparation of a brochure and on the City’s website.</p>	<p>The City has prepared promotional materials for the Reasonable Accommodations process and makes them available at City Hall and on the City's website.</p>	<p>Modified, continued as Program 21.</p>
<p>B2. Zoning Ordinance Update. The City will complete a comprehensive update (and amendment) of its Zoning Code during 2016. The Zoning Ordinance incorporates all of the housing-related zoning amendments contained in the 2009 Housing Element action plan. A draft of the update has been prepared and is currently being reviewed by legal counsel.</p>	<p>The City completed and adopted a new zoning ordinance in 2016. Updates included: An updated definition of “family,” updated uses for transitional housing and supportive housing, increased minimum density in R-3, and classified multifamily residential and mixed-use development as permitted uses in all commercial zones.</p>	<p>Modified, part of Program 20.</p>
<p>B3. Increase Height Limit in R-3 zone. Multi family development in Firebaugh is currently limited to two stories in height – primarily due to the limitations of the City’s firefighting equipment. This could be an impediment to the development of affordable housing. The City will pursue funding for acquisition of a ladder truck that allows construction of at least three story structures. If successful the City will also amend its Zoning Ordinance to allow three story residential buildings.</p>	<p>The City determined it is not feasible to increase multifamily height standards due to limitations of the City’s current fire-fighting vehicles. The purchase of a ladder truck to access taller buildings is prohibitively expensive for Firebaugh. In addition, it has been shown that two-story multifamily units are affordable for Firebaugh households. In 2017, a 30-unit senior housing project (Rio Villas) was built in downtown Firebaugh as a two-story project. Additionally, the Fresno County Housing Authority has received approval to completely rebuild one of its projects (Firebaugh Family Housing) as an affordable two-story project.</p>	<p>Deleted. The city’s current standards allow for maximum density and affordability to be achieved.</p>
<p>B4. Amend the Definition of “Family.” The Firebaugh Zoning Ordinance’s current definition is overly-restrictive and not consistent with State law, and therefore the definition of the term “family” needs to be amended. The City will incorporate this amendment into the comprehensive zoning ordinance update that is currently under way. A suggested definition is as follows: One person or two or more individuals living together sharing household responsibilities and activities, which may include, sharing expenses, chores, eating evening meals together and participating in recreational activities and having close social, economic and psychological commitments to each other.</p>	<p>An updated definition of the term "family" was adopted along with the comprehensive zoning ordinance update in 2016.</p>	<p>Modified, part of Program 20.</p>
<p>B5. Add Transitional and Supportive Housing as permitted uses in</p>	<p>The uses for transitional housing and supportive housing were</p>	<p>Modified, part of</p>

Program	Implementation Status	Recommendation
<p>all residential zones. Firebaugh currently allows transitional and supportive housing in the R-3 and C-3 zones but state law requires that it be allowed in all residential zones, only subject to zoning standards that apply to other residential uses in that zone. Accordingly the City will need to amend the zoning ordinance to allow transitional and supportive housing in the R-1 and R-2 zones. The City will incorporate these amendments into the comprehensive zoning ordinance update that is currently under way.</p>	<p>adopted along with the comprehensive zoning ordinance update in 2016.</p>	<p>Program 20.</p>
<p>B6. Ensure General Plan Consistency. Whenever a General Plan element is being amended (to add new policies or new land use designations, for example) the Planning Department shall include an analysis of whether the amendment is consistent with policies of the Housing Element.</p>	<p>Though no instances of amendments have arisen during the planning period, the City continues to ensure that any General Plan amendments are consistent with the Housing Element.</p>	<p>Deleted. This is an ongoing process for the City.</p>
<p>B7. Minimum Density for the R-3 Zone. The City shall amend the Zoning Ordinance to specify a minimum density of 20 units per acre for the R-3 zone on lots that are large enough to accommodate at least sixteen dwellings.</p>	<p>A minimum density of 20 units per acre for the R-3 zone was adopted along with the comprehensive zoning ordinance update in 2016.</p>	<p>Deleted.</p>
<p>C1. Planned Development Zone. Firebaugh will encourage private developers who are proposing residential development to seek a P-D (Planned Development) overlay district. Planned Development standards allow for greater flexibility in residential design and more efficient utilization of land. These opportunities allow the developer to potentially provide a more affordable housing product. Within the past five years the City has successfully facilitated the approval of over 760 lots within P-D zoned subdivisions.</p>	<p>No Planned Development projects were proposed during the planning period, though the City has facilitated this type of project in the past, including the San Joaquin Villas (21 lots), and Valle Del Sol (187 lots).</p>	<p>Continued as Program 11.</p>
<p>C2. HOME Program Funding. The City of Firebaugh and the Firebaugh Redevelopment Agency will continue to implement the first time home buyer program with HOME funds and other identified sources (including a portion of the Redevelopment Agency’s annual 20 percent set aside funds). This program serves those households who are otherwise excluded from the market-rate purchase of a home within the community (households earning less than 80% of the area median income). Buyers will be first-time home buyers (not having owned a home for the previous three years). Financial participation in these programs will include assistance with down payment costs, closing costs and other secondary financing mechanisms. The City will market this program utilizing English and Spanish language brochures.</p>	<p>The City received HOME funding from the State in 2020 but no applications were received for the program during the planning period.</p> <p>The City maintains brochures and flyers on housing programs at Firebaugh City Hall. These materials are available in English and Spanish.</p>	<p>Continued as Program 8.</p>

Program	Implementation Status	Recommendation
<p>C3. 2030 General Plan Implementation. The City shall implement policies in the 2030 General Plan that will lead to diversification of Firebaugh’s economy – thereby creating more opportunities for the establishment of moderate and above moderate-income housing.</p>	<p>The City has implemented several action plans in the General Plan and other strategies:</p> <p>The City obtained funding for sewer line replacement, upgraded treatment capacity of the wastewater treatment plant, and construction of a new fire station. Most recently, the City witnessed new retail commercial development along State Highway 33.</p> <p>Due to funding constraints, the City has not been able to hire a marketing consultant to promote the City. However, Firebaugh participates with the Fresno County Economic Development Commission to promote the City. The City continued to work with Habitat for Humanity to finish a 21-lot Planned Unit Development (San Joaquin Villas) and continues to support processing West Hills College campus redevelopment.</p>	<p>Deleted. This is reported annually in the City’s Annual Progress Report.</p>
<p>C4. Marketing the City. To improve its economy the City should consider hiring a marketing firm to promote Firebaugh and improve its economic diversification, to create new and better paying jobs and housing opportunities.</p>	<p>Due to funding constraints, the City has not been able to hire a marketing consultant to promote the City. However, Firebaugh participates with the Fresno County Economic Development Commission to promote the City.</p>	<p>Continued as Program 19.</p>
<p>D1. Project Review. The City of Firebaugh shall facilitate residential development that is well-designed and maintained, attractive and affordable. Affordable housing units will be accomplished through increased unit densities; attractive design through architectural review through the city’s site plan review process and proper maintenance, through conditions such as maintenance agreements and landscaping and lighting districts.</p>	<p>This action plan is implemented with each development project that is submitted to the City. Because Firebaugh is a small city, it does not have multiple layers of bureaucratic review, which hamper projects in other cities.</p> <p>In 2019, the City processed three major residential developments: Del Rio Estates (33 single-family residential lots); Del Rio Place (56 multifamily residential units); and Greystone Estates (131 single-family residential lots). During 2021 the City processed a complete redevelopment of the Housing Authority's Firebaugh Family Housing complex that will transform it from 34 units to 68 units.</p>	<p>Delete. This is an ongoing process for the City.</p>
<p>D2. Community Development Block Grant Funding. Firebaugh will seek to annually apply for CDBG funds for rehabilitation of housing in Firebaugh. The City will aim to process 5 housing rehabilitations per year under this funding.</p>	<p>The City did not obtain CDBG funding for housing programs during the planning period; therefore, no assistance was provided using this source.</p>	<p>Continued as Program 9.</p>
<p>D3. Code Enforcement. Firebaugh will seek to re-establish a code enforcement officer to improve housing conditions in the community.</p>	<p>The City has a full-time code enforcement officer in the Police Department. The City does not maintain statistics on code</p>	<p>Modified, continued as Program 26.</p>

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To make the position more affordable, the City will consider sharing the code enforcement officer with neighboring communities (Mendota and Dos Palos).	enforcement cases specifically related to housing issues.	
D4. Community Clean Ups. Firebaugh will continue its semi-annual community cleanup events, where residents are allowed to set out items for disposal or recycling.	The City continues its semi-annual community cleanup events, where residents are allowed to set out items for disposal or recycling.	Deleted.
D5. Redevelopment. The City should consider re-establishing a redevelopment program, as provided for in AB 2 and SB 107 (see right). Such a program would provide important financing tools to allow the City to promote the development of affordable housing and also public works programs.	<p>The City has lacked the resources to establish a redevelopment program and is unlikely to qualify to do so under existing redevelopment law.</p> <p>The City has not received HOME funding since 2012. The City has received CDBG funding nearly every year, but this has been directed toward infrastructure projects. The City has not received LEAP or REAP funding, but it has benefited from LEAP funding received by the Fresno Council of Governments—specifically, a program to promote the construction of accessory dwelling units by offering construction plans to Firebaugh residents at no cost, and also conceptual planning for affordable housing in the downtown area.</p>	Deleted.
E1. Monitor Land Supply. Monitor residential land development and demand, in the context of lands designated for residential development on the Land Use Map of the Firebaugh General Plan. Make adjustments to the map accordingly, as demand warrants, to ensure that an adequate supply of land exists for future residential development.	The City Planner regularly tallies the amount of undeveloped, available land for residential development. Information is not available online but is provided upon request.	Modified, continued as Program 4.
E2. 2030 General Plan Implementation. Implement the 2030 General Plan Update particularly as it pertains to housing programs.	<p>The City has implemented several action plans in the General Plan and other strategies:</p> <p>The City obtained funding for sewer line replacement, upgraded treatment capacity of the wastewater treatment plant, and construction of a new fire station. Most recently the City has witnessed new retail commercial development along State Highway 33.</p> <p>Firebaugh participates with the Fresno County Economic Development Commission to promote the City. The City continued to work with Habitat for Humanity to finish a 21-lot Planned Unit Development (San Joaquin Villas) and continues to support processing West Hills College campus redevelopment.</p>	Deleted. This is reported annually on the City’s Annual Progress Report.

Program	Implementation Status	Recommendation
E3. Utility Master Plans. A review of each of Firebaugh's utility master plans should be conducted over the next five years. These master plan reviews should provide a five-year capital improvement program for each infrastructure system and a mechanism for financing these improvements consistent with AB 1600.	The City has received CDBG funding to prepare studies of the sewer and storm drainage master plans to ensure they can accommodate long-term growth and development. Work is currently proceeding on these studies.	Modified, continued as Program 5.
E4. Utility Priority. The city will give priority for water and sewer service to qualified affordable housing projects, consistent with SB 1087.	The City relied on this policy within the context of the Housing Element, though this did not come up during the 5th cycle Housing Element period.	Modified, continued as Program 5.
E5. Impact Fee Review. The city will review (and update as necessary) its utility impact fees. The fees were last updated in 2006.	The City adopted a new impact fee schedule in 2017.	Modified, continued as Program 23.
F1. 2030 General Plan Implementation. Implement policies of the 2030 General Plan update and amend sections of the Firebaugh Zoning and Subdivision Ordinances to promote energy conservation. Specifically, amend sections of the ordinances that refer to solar orientation, planting of street trees, width of streets, and minimizing the use of cul-de-sac streets.	The City continued to implement energy-conservation policies of the General Plan with each new development project, such as requiring shade trees along new streets and design/layout for optimum solar orientation for new developments. Most recently this was accomplished with the 131-lot Greystone Estates subdivision. In the Greystone Estates subdivision, the developer was required to establish street trees for shading and cooling purposes, and most streets in the development were oriented east-west to optimize active and passive solar energy opportunities.	Deleted.
F2. Weatherization Program. Reinstate implementing weatherization programs for senior and low income households. The rehabilitation of housing units using CDBG funds will include energy conservation improvements, including energy efficient windows, wall insulation, weather stripping, etc.	During the 5th cycle planning period, no weatherization projects were funded.	Continued as Program 28.
F3. Fees for Solar Systems. Adopt reduced building permit fees for the installation of residential solar power systems	Due to severe budget constraints, the City has postponed offering fee reductions for solar systems.	Deleted.
G1. Rental Assistance. Firebaugh will encourage rental assistance for extra low-, very low- and low- income households through programs provided by the Fresno County Housing Authority.	The City continued to work with the Housing Authority to assist with their rental programs by providing referrals for interested individuals. In 2020, the City approved the complete redevelopment of the Firebaugh Family Apartments from the existing 34 units to 68 units. Of these, 51 units are deed-restricted for very low-income households and 16 units are for low-income households. The remaining unit is for the site manager.	Modified, part of Program 29.
G2. Housing Information. Firebaugh will prepare and update a newsletter and brochure detailing equal housing opportunity programs.	Completed. The City offers housing information brochures in English and Spanish. These materials are available in the lobby at	Deleted.

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Program	Implementation Status	Recommendation
<p>Consideration will be given to including these brochures in monthly utility bills. This information will also be added to the City’s website and made available at various locations such as City Hall, the Post Office, Library, Community Center, Senior Citizen’s center and other appropriate locations. Information shall be prepared in English and Spanish. Individuals with questions or complaints will be referred to the appropriate department as follows:</p> <ul style="list-style-type: none"> ▪ Code Enforcement and building code issues: Firebaugh Building Department ▪ Planning and zoning issues: Firebaugh Planning Department ▪ Landlord issues and complaints: California Department of Fair Employment & Housing ▪ Section 8 and Housing Authority Units: Fresno Housing Authority 	<p>Firebaugh City Hall.</p>	
<p>G3. Accessibility. Firebaugh, through its Site Plan Review and building permit processes will require that all ground floor multi-family housing units meet accessibility requirements of state and federal housing requirements.</p>	<p>The City implements this action plan with all new multifamily development projects. The Rio Villas senior apartments (completed in 2017) features 30 handicap-accessible senior apartments. This two-story project features elevators so that second-floor units are handicap-accessible. In 2019, the City approved the 56-unit Del Rio Place apartments. All 28 ground-floor units are adaptable for disabled individuals.</p>	<p>Deleted. This is an ongoing process for the City.</p>
<p>G4. Promote the Reasonable Accommodations Ordinance. The Planning and Building Department will continue to promote the City’s newly-adopted reasonable accommodations ordinance through the creation of promotional materials – brochures, flyers and on the City’s website.</p>	<p>The City adopted a Reasonable Accommodations ordinance in 2009 and has informational handouts to explain the ordinance. Handouts about the ordinance in English and Spanish are available at City Hall.</p>	<p>Modified, part of Program 21.</p>
<p>G5. Public Participation. The City will continue to implement programs of information and involvement to ensure that all segments of Firebaugh’s population has the opportunity to know and participate in housing programs. These strategies will include the following:</p> <ol style="list-style-type: none"> a. Make the Housing Element available in electronic form on the City’s website b. Prepare a written (and on-line) brochure that explains the City’s housing programs and policies. The brochure should be made available in English and Spanish. c. Continue to publicize meetings and events concerning housing. 	<p>The Housing Element is posted on the City’s website, and the City has available brochures and other printed materials on housing programs, including hard copy and digital versions.</p>	<p>Deleted.</p>

Program	Implementation Status	Recommendation
<p>H1. Conversion Monitoring. The City will closely monitor notices of the potential conversion of existing affordable housing projects to market-rate rents, and will undertake actions (as feasible) to try to preserve the affordability of such units. There is one development (Firebaugh Gardens Apartments) whose affordability restrictions may expire in 10 years. The City will also notify tenants of projects for which a notice of conversion has been received. The City will notify appropriate state and federal housing agencies that administer rent-restricted units in Firebaugh that it wishes to receive notices of potential conversion of units to market-rate rents. Entities that have indicated interest in participating in affordability programs are listed in Table 5-5 of Chapter 5.</p>	<p>The City continues to monitor notices of conversion. No conversion notices appeared during the planning period.</p> <p>According to information in the Housing Element, the Firebaugh Garden Apartments was the next assisted project scheduled to convert to market-rate housing (in 2025). This project sought a continuation of subsidies to preserve its affordability, and the City assisted with this process by reviewing and assisting with renewal applications in a timely manner.</p>	<p>Modified, continued as Program 14.</p>

APPENDIX 1C-6: PUBLIC OUTREACH AND ENGAGEMENT

State law requires cities and counties to make a diligent effort to achieve participation from all segments of the community in preparing a Housing Element. Section 65583[c][6] of the California Government Code specifically requires that “[t]he local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the program shall describe this effort.”

The diligent effort required means that local jurisdictions must do more than issue the customary public notices and conduct standard public hearings prior to adopting a Housing Element. State law requires cities and counties to take active steps to inform, involve, and solicit input from the public, particularly low-income and racial and ethnic households that might otherwise not participate in the process. Spanish-language materials were available, and Spanish translation was made available by request.

To meet the requirements of state law, the City of Firebaugh completed the public outreach at both the local level and as part of the regional Fresno County Multi-Jurisdictional Housing Element effort to encourage community involvement. These efforts included:

- Regional Project Website
- Stakeholder Consultations and Focus Groups
- Study Sessions with Planning Commissions, City Councils, and the County Board of Supervisors
- Community Workshops
- Community Survey

Regional efforts included three sets of community workshops, consultations, and a community survey, all of which are discussed in detail in Appendix 1: Regional Housing Element Public Outreach.

Joint Planning Commission/City Council Study Session

On September 12, 2022, a Joint Planning Commission/City Council Study Session was held to introduce the 2023-2031 Housing Element update and to review new State laws. The public was also invited to attend and participate in this virtual event. Staff presented an overview of the Housing Element update process and the required contents of the element, discussed early strategies and possible sites to meet the City’s RHNA, reviewed new state laws, and solicited feedback from the City Council, Planning Commission, and community members on these strategies and other housing needs in Firebaugh. Both the City Council and Planning Commission had no questions at the time of the presentation. No public comments or questions were received during the study session.

Community Workshop

A community workshop was held on August 18, 2022, from 1:00 to 2:30 pm. To invite the community to the event, the following outreach efforts were conducted:

- Flyers in English and Spanish were distributed through the Fresno COG email list and list of regional stakeholders and CBOs.
- Eventbrite registration pages were created in both English and Spanish along with a Facebook event.
 - The Eventbrite and Facebook pages advertised that Spanish language interpretation, refreshments, and activities for kids would be provided.
 - The Facebook event was posted to City’s Facebook Page.
- Flyers were sent out through the Fresno Housing Authority to send to residents of affordable housing.

In the presentation, members of the public were introduced to the process of developing the Housing Element both for the region and for the city of Firebaugh. They were also given information about current housing conditions in the region and in Firebaugh and were invited to participate in a discussion about local housing needs. The discussion was prompted by the following questions:

- What do you think are the most critical housing issues in your community?
- What do you think are the housing types most needed in the community?
- When assessing new housing development that might be built in the next 8 to 10 years, what should be the community’s most important consideration?
- Is there anything else that you can share regarding additional housing opportunities in the community?
- Any suggestions for soliciting additional Housing Element feedback?

Three community members attended the workshop. Participants noted that increased demand for housing in Firebaugh during the COVID-19 pandemic drove prices up. About five families moved to Firebaugh from the Bay Area during the last several years.

Mary Ayala, Habitat for Humanity Mortgage Loan Officer, noted that she has been having trouble getting families to qualify for their projects because they are making just above the income limits. Mary noted it is very difficult for affordable housing developers to compete for federal and state funding in the area. In particular, Habitat for Humanity is having a difficult time funding a particular project because it is considered “at risk” by lenders, so Habitat is having to front the money. She added that many farmworkers are impacted by the drought and many are undocumented and legal face barriers to housing like the legal residency requirement for USDA programs.

Ben Gallegos, City Manager, noted that they have to waive impact fees for market rate housing to compete with other areas. They have difficulty in getting developers to come to Firebaugh, but Firebaugh does have a good working relationship with the Housing Authority, Habitat for Humanity, and Self-Help Housing. Ben noted that a predevelopment loan source for housing projects may be useful. Residents are facing other high costs of living like high PG&E utilities. Ben noted that there are many farmers in the west of Firebaugh who are selling their land to housing developers at very high prices and that this cost is then passed on to the homebuyer.

Felipe Perez, mayor pro tem council member, mentioned that there are a lot of fieldworkers making minimum wage that are in need of incentives and subsidies to find housing.

The discussion also included conversation about a demand for housing units with three to four bedrooms and housing and programs that serve moderate-income families.

Stakeholder Interviews

Throughout the summer and fall of 2022, several interviews were conducted with stakeholders who work in areas such as housing, homelessness, and other social services in Firebaugh and throughout the Fresno County area. Summaries of their responses are below.

BIA of Fresno/Madera Counties

The president of the Building Industry Association of Fresno/Madera Counties (BIA), Mike Prandini, was interviewed in November 2022. The BIA is an industry organization that represents builders, developers, subcontractors, and affiliated businesses in the residential, commercial, and industrial building industry throughout the region.

The current shortage of housing has created demand, which can be a positive for BIA's members. Most jurisdictions have sufficient available land to build new housing. Kingsburg was identified as an outlier in this, as they have a growth limitation ordinance, so the two builders that work in the area have been able to work but at a slower pace. The statewide move to require all-electric utilities rather than gas is a concern. For market-rate housing, the State's vehicle miles traveled (VMT) regulations are a large barrier, as transit isn't reliable, and a car is necessary to get around. Builders have to pay a fee to get around the cost of mitigating car miles unless City Councils can make a finding of an unavoidable impact. For affordable housing, the prevailing wage requirements are a barrier to development due to the increased cost. Infrastructure costs also affect both types of projects. Streamlining tools help with increasing costs, but not enough. A lack of local water access is also a barrier to development. He expressed concern that the State assigned the RHNA without this in mind. There may not be enough water access to support the housing development that the State is looking to see.

In his experience, single-family homes are in greatest demand. There is a lot of demand for low-income housing projects, but these aren't financially viable for developers without government subsidy. However, including government subsidy in projects increases the overall cost to build, as it triggers prevailing-wage requirements. A recent affordable development in the City of Fresno cost around \$400,000 per unit to build. Condo-style projects are also a possibility, but in his experience, they don't tend to be successful in this region. To keep prices within reach of local residents, recent projects have needed to be built at higher densities. A typical project is between 8 and 15 units per acre on small lots, with single-family homes built as two-story structures in order to reach 1,200 or 1,300 square feet. Developers need to build higher-density projects to spread out the cost of infrastructure among a larger number of units. Demand isn't as high in smaller communities as it is in the cities of Fresno and Clovis. These cities have better access to jobs, education, and medical centers. VMT mitigation costs increase in communities that are far from these economic centers, so it's less of an issue in closer communities like Sanger, Reedley, Kingsburg, Fowler, and Kerman. Coalinga is too far away from the economic center of the

region, which causes challenges. Many residents of Mendota and San Joaquin have incomes that are too low to afford development at its current costs. He indicated that more downpayment assistance and maintenance programs are needed throughout the region. Fresno Housing Authority has some, but they're limited.

Fair Housing of Central California

A representative of Fair Housing of Central California (FHCCC) was interviewed on September 27, 2022. The organization works to eliminate housing discrimination and expand housing opportunities to all persons. The FHCCC receives any fair housing complaints and tracks them by location, zip code, gender, race or ethnicity, and type of complaint. The most common fair housing issue that clients report is discrimination related to disability or race. She expressed concern that fair housing practices are not really embraced by local government, and that cities should avoid promoting the development of new housing in neighborhoods where segregation is deliberately continued by landlords and real estate agents. Her clients prefer decent, affordable, and accessible housing, but as the cost of purchasing a home increases, opportunities decline. She feels there is adequate rental housing in the community, including for seniors and persons with disabilities, but affordability and accessibility remain barriers.

Fresno Madera Continuum of Care

As a representative for the Fresno Madera Continuum of Care (CoC), Laura Moreno was interviewed in October 2022. Ms. Moreno is a program manager for Fresno County's Department of Social Services (DSS). The CoC does not provide direct services, but instead is a collaborative of agencies that work together to provide homeless services. At present, there is insufficient low-income housing for those who are homeless. Many people in the region are on a fixed income, including disability or social security, and cannot afford housing.

Law Office of Patience Milrod

Fresno-area civil rights attorney Patience Milrod was interviewed on October 31, 2022. While Ms. Milrod supports the continued attention to inclusionary housing, she has concerns about the passive language of "facilitate" and "encourage" that has been common in past Housing Elements. She identified code enforcement as a strategy for improving housing quality that could be strengthened. At present, rents are increasing while the quality of housing is decreasing and there isn't a lot of energy locally to correct that imbalance. This particularly hurts lower-income households. With more aggressive code enforcement in place, she suggested that some landlords may decide that the cost of maintaining their property isn't worthwhile and may choose to sell to a community land trust or Habitat for Humanity rather than entering receivership. She would like to see that as a specific goal. The biggest barrier to finding affordable, decent housing in the region that she identified was that lower-cost housing tends to also be low quality or ill maintained. However, she cautioned that the supply problem won't be solved with suburban or exurban single-family dwelling units. There's also local disinclination to build lower-income housing in areas of opportunity. She suggested that cities should ask for affordability covenants in perpetuity and highlighted the land trust model as a way to enable that.

Central Valley Urban Institute

On September 07, 2022, Eric Payne, the executive director of the Central Valley Urban Institute (CVUI), was interviewed. The CVUI is an advocacy organization working throughout the Fresno area. He indicated that there may be opportunities to increase affordable housing stock production, particularly in infill areas and brownfields, as well as to increase homeownership through programs like the downpayment assistance program. However, he expressed concerns about high building costs, lack of financing, and poor leadership in the area. Community members would like to see intergenerational housing, middle-income housing, and “missing-middle” sized housing as well as housing to end homelessness, particularly among college-aged youth. At present, he does not believe that there are adequate opportunities for homeownership or adequate rental housing. The largest barriers are access to credit, lack of financial education, and existing housing cost burden. There is a lack of investment in programs that serve low- to moderate-income communities.

Resources for Independence Central Valley

On November 1, 2022, a representative from the organization Resources for Independence Central Valley was interviewed. The representative expressed concern about laws in the City of Fresno that prevent homeless community members from camping or living in their cars. Homelessness is increasing, but the City is investing resources in enforcing these laws rather than providing assistance. There is funding to move homeless people around, but not to improve anyone’s living situation. Access to Section 8 can be a challenge, as the waiting list can be four or five years long. Additionally, rental housing can require incomes of two to three times the rent, which can be a barrier to some who need to access rental housing. For those who may be able to access housing, some landlords levy additional fees during the application process that can present a prohibitive cost. Credit checks are becoming a barrier for residents to get into housing. Community members with disabilities can experience additional challenges trying to find homes that have necessary accessibility features. Homeowners with disabilities end up needing to make expensive home improvements in order to make their homes accessible for themselves. For renters, these improvements may be more challenging to implement, and those who use service or support animals may experience discrimination against pets. There isn’t enough higher-density housing, housing near transit or major transportation corridors, or housing in good repair.

Llaves de tu Casa Iniciativa

As a follow-up to the regionwide stakeholder focus groups held in October and November 2022, a collection of members from the Llaves de tu Casa Iniciativa (LDTIC) met on December 13, 2022, to respond to several stakeholder interview questions. The initiative is a financial education program open to all County of Fresno residents but with a focus on increasing Latino homeownership rates. Eight initiative members represented organizations and companies, including Envision Fresno (Mirna Garcia), Self Help Enterprises (Rick Gonzales, Alicia Bohigian), CORE Home Loans (Pablo Estrada), Union Bank (Reyes Ruiz), the California Association of Realtors (Sabrina Brown), and the National Association of Hispanic Realtors (Aldiva Rubalcava, Lucy Sandoval). The group collectively serves Fresno County, and members also serve other counties in the Central Valley.

The opportunities for future housing in the region that the initiative members identified included LTDC's ability to provide homeownership education virtually and in partnership with other local organizations. There has been a lack of financial literacy in the community along with challenges in using technology and language barriers.

The initiative members expressed concerns about affordability, including the location of affordable housing in undesirable areas. Upzoning single-family zoning would create more opportunities for the development of multifamily housing in more desirable locations. Some funding is only available in certain areas, which can exacerbate existing patterns of segregation and close proximity to industrial uses. They also expressed concern about investors displacing community members in order to establish short-term rentals while community members live in hotels. The State's mandate to install solar panels on new homes was also cited as an additional cost that will drive up the buyers' or renters' cost.

The gap between ownership housing affordability and program income limits was identified as a barrier to accessing housing. Moderate-income households earn too much to qualify for housing assistance, but those who qualify aren't able to afford the housing available. In addition to a lack of multifamily rental housing, there aren't many condo buildings in the region, which could present another affordable homeownership strategy. The establishment of land trusts was also identified as a potential strategy for increasing affordability, as well as donations of land from municipalities.

Self Help Enterprises has partnered with the City of Clovis on their recent accessory dwelling unit program and has partnered with Salt + Light to develop tiny homes for transitional housing.

Fresno Housing Authority

Two representatives from the Fresno Housing Authority, Doreen Eley and Michael Duarte, were interviewed on January 11, 2023. The Fresno Housing Authority currently has housing projects in every jurisdiction participating in the Multi-Jurisdictional Housing Element except for Coalinga. The City of Fresno has a separate Housing Authority.

The representatives noted that there is tremendous demand for housing in all communities in Fresno County. The last time the Section 8 waiting list opened they received more than 50,000 applications. Recently, when a 60-unit development in Clovis opened, they received more than 10,000 applications. When a project in downtown Fresno opened, they received 4,000 applications within a two-week period. Rents are high, which is challenging for residents but good for developers. The region needs more housing opportunities for people experiencing homelessness.

In rural and unincorporated communities, lack of water and sewer capacity is a major concern. The Housing Authority can't build housing in areas with no services.

For local developers, state funding and streamlining programs trigger skilled, trained, and prevailing wage requirements, which can be a barrier. Entitlement processing timelines are a barrier to development for the Housing Authority. The representatives gave the example of a recent project in San Joaquin where streamlined initiatives were used, but the project still took a year to finish the project review process. Many communities

don't have much staff capacity and have part-time consultants to complete the work.

There is also a lack of capacity among agencies that provide services in rural and unincorporated areas. This is especially challenging for special needs populations that need mental health services. There is a countywide Department of Behavioral Health, but no offices in smaller cities. The representatives gave the example of a Homekey project in Huron that the Housing Authority wanted to assist with, but there were no service providers available to serve the project.

While there is a lot of interest within the community for homeownership opportunities, more funding is available for multifamily rental projects. The Housing Authority is more focused on rental projects and arriving at deeper affordability levels.

The Housing Authority is following the State's lead in providing housing in high opportunity areas. There are lots of incentives to do this to compete for tax credits and other state funding programs. The representatives mentioned that they are trying to balance this need by also working to improve the lower-resource areas where folks are already living along with disadvantaged communities like Del Ray and Lenar.

The COVID-19 pandemic brought challenges for many residents of Housing Authority projects. There were increases in domestic violence, and it was challenging for property managers to enforce rules.

Noticing of Study Sessions and Community Workshops

Notice of the Joint Study Session was made available as part of the City's standard meeting notice process for City Council and Planning Commission meetings.

The Community Workshop was advertised to members of the public through multiple information channels. Flyers in English and Spanish were distributed through the Fresno COG email list and list of regional stakeholders and CBOs. Flyers were also sent to the Fresno Housing Authority for them to post and distribute.

Noticing of the Draft Housing Element

Per California Government Code Section 65585, the draft Housing Element was made available for public comment for 30 days, from September 22, 2023. The draft was made available on the City's website and was noticed to residents through the same methods as the Planning Commission and City Council meetings. Additional direct noticing was sent to local housing advocate groups and other stakeholders.



A Regional Plan for Addressing Housing Needs

*Fresno County • Coalinga • Firebaugh • Fowler • Fresno City • Huron • Kerman
Kingsburg • Mendota • Orange Cove • Parlier • Reedley • San Joaquin • Sanger • Selma*

