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**To:** [GPR](#)  
**Cc:** [Motta, Chris](#)  
**Subject:** Comments on the GPR/ZOU  
**Date:** Tuesday, June 27, 2023 4:23:25 PM  
**Attachments:** [2023 - 06-27 - Letter from Radley Reep to Fresno County - Comment on the GPR-ZOU and Associated Draft EIR - Submitted this Date.pdf](#)  
[2023 - 06-27 - Difficulty Understanding the Nature of General Plan Amendment No. 529 and EIR - Submitted to the County this Date.pdf](#)  
[2023 - 06-27 - 2017 APR for Fresno County - Prepared by the League of Women Voters of Fresno - Submitted to the County this Date.pdf](#)  
[2023 - 06-21 - Comment Letter on the 2023 Draft EIR re the New Environmental Justice Element for the Fr Co GP.pdf](#)

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**CAUTION!!! - EXTERNAL EMAIL - THINK BEFORE YOU CLICK**

June 27, 2023

Hi Chris,

Please find attached four documents:

1. A comment letter on the Draft EIR for the General Plan Review and Zoning Ordinance Update
2. An attachment to that letter titled *Difficulty Understanding the Nature of General Plan Amendment No. 529 and EIR*
3. An attachment to that letter titled *2017 APR for Fresno County - Prepared by the League of Women Voters of Fresno*

I'm also resending my critique of the new Environmental Justice Element because I did not receive confirmation that the County had received it.

Please let me know if these four documents arrived.

Thanks,

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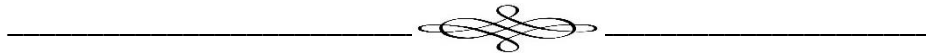
June 27, 2023

Chris Motta | Principal Planner  
Department of Public Works and Planning  
2220 Tulare St., 6<sup>th</sup> Floor  
Fresno, CA 93721

**RE: Comments on the Draft EIR for the General Plan Review and Zoning Ordinance Update**

This letter is comment on the Draft Environmental Impact Report (EIR) for the 2023 General Plan Review and Zoning Ordinance Update (GPR/ZOU).

Having carefully read the 2023 Draft General Plan Policy Document and the associated 2023 Draft EIR, I've come to the conclusion that proposed changes for the 2000 General Plan significantly weaken policies and programs designed to conserve and protect agricultural land. I further find that the Draft EIR is deficient in its evaluation of proposed changes.



**1. Introduction**

Nearly twenty years ago, the update of the Fresno County General Plan (in 2000) greatly strengthened long-standing efforts by county residents to conserve and protect agricultural land.

The Draft Environmental Impact Report (DEIR) prepared for the adoption of the 2000 General Plan explained it this way.

“The Draft General Plan policies would help the County clearly define where new development should occur and where agricultural land should be preserved. For example, Policy LU-A.1 states that new development should be located within existing urban areas....Policies LU-A.15, LU-A.16, LU-A.20 and LU-B.14 also provide direction for the County to consider [when] establishing several agricultural conservation programs, including setting up criteria to determine which lands should receive priority funding for land conservation easements, establishing an agricultural mitigation fee program to help offset development on agricultural lands, and participation in the Agricultural Land Stewardship Program Fund.” (2000 DEIR, page 4.3-12.)

Adoption of the 2000 General Plan update was an extraordinary achievement for ag land conservationists. However, some individuals knew that protections could be further strengthened. Of note is a comment letter on the DEIR for the 2000 General Plan update submitted by Harold Tokmakian, a certified planner who was former Director of the County Planning Department and a professor in Urban and Regional Planning at California State University, Fresno. Said he,...

“It appears that some prime agricultural land will be lost in the future to urban development, mining and other non-farm uses. Some of this precious resource, essential for the County’s economic base will be unavoidable but all such loss is significant. To protect our limited prime land resources, partial mitigation can be accomplished by a new policy to add to Goal LU-A to recognize that prime agricultural land lost to non-farm uses be replaced by the responsible party with acquisition of conservation easements and the transfer of these rights to an appropriate conservation entity. The approach elevates our prime farm land resources to the level now established for wetlands and the related “no net loss” policies and programs. (See OS-D.1,2)

Such a policy is realistic, feasible and forward-thinking here in the San Joaquin Valley. Not only will it be a positive initiative to help attain Goal LU-A but it is also related to Goal LU-F and Goal LU-G. A careful analysis of the County’s prime land resources in proximity to locations around the Fresno-Clovis Metropolitan Area can identify priority acreage for such a program. Finally, the policy should be a disincentive for encroachment of urban and other non-farm development into our scarce agricultural land resources.” (April 21, 2000, Harold Tokmakian.)

The County took his recommendation seriously, as reported in the Final EIR.

**“Response to Comment 22-7:**

The Fresno County Planning Commission debated at length this ‘no net loss’ policy recommendation but could not achieve consensus to add the policy. Revised Policy LU-A.15 and a new program under LU-A require the County to periodically review agricultural land protection measures, including conservation easements, for possible adoption. (Final 2000 EIR, pages 3-81 and 3-82.)

Despite the lack of consensus on the part of commissioners, as part of the October 3, 2000 update of the 2000 General Plan Policy Document, the Board of Supervisors changed the text of the Policy Document to further strengthen ag land conservation. For example, the first paragraph in the Introduction to the General Plan was revised to place the protection of agricultural land, literally and symbolically, ahead of “development.” The change is shown below.

“The Fresno County General Plan is a comprehensive, long-term framework for the development of the county and the protection of the county’s agricultural, natural, and cultural resources and for the development in the county.” (2000 General Plan Policy Document, page 1.)

On the day of plan adoption, the Board of Supervisors also added to the General Plan Policy Document the text underlined below.

“Since the early 1950s, Fresno has been the leading agricultural county in the United States in the value of farm products. Since most of the county’s highly productive agricultural soils could be easily developed by urban, rural residential, and other non-agricultural uses, careful land use decision-making is essential to minimizing the conversion of productive agricultural land. This land use conversion diminishes Fresno County’s agricultural production capacity and economic viability and detrimentally impacts surrounding agricultural operations to the extent that further losses in production may occur. As the introduction to the Economic Development Element states, the first step in expanding the county’s job base is to strengthen the county’s historical economic base of agriculture.”

And on that day the Board incorporated into the plan several additional policies and programs designed to further protect and conserve agricultural land, including these:

**LU-A.14**

“The County shall ensure that the review of discretionary permits includes an assessment of the conversion of productive agricultural land and that mitigation be required where appropriate.”

**Program LU-A.B**

“The County shall evaluate minimum parcel sizes necessary for sustained agricultural productivity on land designated for agriculture throughout the county, and, as appropriate, amend the Zoning Ordinance according to the results of that analysis.  
(See Policy LU-A.6.)”

**Program LU-A.D**

“The County shall periodically review agricultural land preservation programs and assess their effectiveness in furthering the County's agricultural goals and policies.  
(See Policy LU-A.13 and LU-A.16)”

On pages 4.3-3 through 4.3-9 of the Final EIR there is a list of twenty-eight General Plan policies that support “*the goal of long-term preservation and protection of agricultural resources.*” These policies — LU-A.1 through LU-A.21, LU-B.2, LU-B.4, LU-B.5, LU-B.7, LU-B.9, LU-B.10 and LU-B.14 — were all adopted as mitigation measures to lessen impacts to agricultural resources.

Fast forward to 2023, and the question that must be asked is whether the Draft 2023 Policy Document offers the same level of protection to agricultural resources or whether it increases or lessens it. As will be demonstrated in this comment letter, the unfortunate answer is that proposed changes to the General Plan Policy Document significantly weaken support for ag land conservation.

## 2. Changes to Policies and Programs in 2023 that Adversely Affect Ag Land Conservation

Before diving into my assessment of proposed changes to the General Plan, I must note that for the past decade I've found it extremely difficult to participate effectively. This is due in large part to the County having made hundreds of revisions to policies and programs without any meaningful effort to engage the public. But that was not always the case. From 2008 through 2014, the County published a matrix listing all recommendations for revision of the General Plan Policy Document, noting who made each suggestion (whether County staff or a member of the public) and the County's response. But that communication with the public diminished after 2014. (For more information about this, please see the attached document: *Difficulty Understanding the Nature of General Plan Amendment No. 529 (General Plan Review) and the Scope and Content of the Associated Draft EIR.*)

Discussed in this letter are proposed changes to thirty policies and programs in the 2000 General Plan Policy Document that, if adopted, would significantly compromise the County's goal to conserve and protect agricultural land. These policies and programs are primarily housed in two General Plan elements: in the Agriculture & Land Use Element and in the Economic Development Element. Sixteen of the policies and programs are proposed for deletion, nine for revision and five for addition to the plan.

My review of draft changes to policies and programs is in two parts. Section "2a" assesses changes that directly affect efforts to conserve ag land, and section "2b" assesses changes that indirectly affect the County's ability to conserve ag land.

### 2a. Changes Proposed for Policies and Programs that Directly Affect Ag Land Conservation

Identified below are proposed changes to seventeen policies and programs that will have a significant adverse impact on ag land conservation. The first six are program deletions.

If the 2023 Draft Policy Document were to be adopted as currently written, there would no longer be a requirement that the County...

	<b>Requirement in the 2000 General Plan</b>	<b>Comment on the Proposed Change</b>
LU-A.B	...conduct an evaluation to determine the parcel sizes that are necessary for sustained agricultural productivity.	This program was targeted for completion by 2002. No progress was made and the program is now proposed for deletion.

LU-A.I	...look into establishing an agricultural land value scale to be of help in discussions regarding the conversion of agricultural lands.	This program was targeted for completion by 2004. No progress was made and the program is now proposed for deletion.
LU-A.H	...develop a program to establish criteria for the prioritization of funding for agricultural conservation easements.	This program was targeted for completion by 2003. No progress was made and the program is now proposed for deletion.
LU-A.D	...periodically review agricultural land preservation programs to assess their effectiveness in furthering the County's agricultural goals and policies.	In truth, this program is being retained. However, since it has never been implemented and there's little likelihood it ever will be, in practice, it is already deleted.
ED-A.G	...determine if capital deficiencies exist for farmers with the capital costs of shifting production modes to crops that create higher employment levels and, if such deficiencies are identified, work to access additional funds or redirect existing funds.	This program was targeted for completion by 2004. No progress was made and the program is now proposed for deletion.
ED-A.D	...,working in cooperation with the cities, develop criteria for the location in unincorporated areas value-added agricultural processing facilities that are compatible with an agricultural setting.	This program was to have been completed by 2004. No progress was made and the program is now proposed for deletion.

The County also proposes to significantly revise the three policies summarized below.

If the 2023 Draft Policy Document were to be adopted as currently written, the following changes would be made to the 2000 General Plan.

	<b>Synopsis of Policy in the 2000 General Plan</b>	<b>Synopsis of Proposed Change in 2023</b>
LU-A.1	Urban development is limited to areas of the county planned for such development where public facilities and infrastructure are available.	Urban development can be expanded to areas of the county where public facilities and infrastructure are either available <u>and/or planned for</u> .
LU-A.17	The County <u>will</u> accept California Land Conservation (Williamson Act) contracts.	The County <u>should</u> accept California Land Conservation (Williamson Act) contracts — but only if the County receives full subvention payments (reimbursement) from the state.
LU-B.14	Same as above. The County <u>will</u> accept California Land Conservation (Williamson Act) contracts.	The County <u>should</u> accept California Land Conservation (Williamson Act) contracts — but only if the County receives full subvention payments (reimbursement) from the state.

With respect to the policy changes above, most troubling is the change proposed for Policy LU-A.1, which would allow urban development to expand into areas where infrastructure is currently unavailable but where it could be provided.

There is a similar change proposed for the General Plan theme titled “*Urban-Centered Growth*.” The proposed change is redlined below. If the Draft 2023 Policy Document were to be adopted as written, “*Urban-Centered Growth*” would no longer embody limiting urban development to areas of the county that “*already*” have the infrastructure necessary for such growth. Instead, it would embrace expanding growth to areas where infrastructure does not now exist but could be provided. Shown below is a redlined version of the theme (2000 on the left, 2023 on the right).

### Changes Proposed for the General Plan Theme Supporting “Urban-Centered Growth”

#### Citation from 2000 General Plan

“The plan promotes compact growth by directing most new urban development to incorporated cities and existing urban communities ~~that already have the infrastructure~~

to accommodate such growth. This plan assumes over ~~93 percent~~ of new population growth and new job growth will occur within incorporated city spheres of influence and seven percent would occur in unincorporated areas ~~(see Appendix A)~~.

Accordingly, this plan prohibits designation of new areas as Planned Rural Community and restricts the designation of new areas for rural residential development while allowing for the orderly development of existing rural residential areas.”

#### Citation from the 2023 Revised General Plan

“The plan promotes compact growth by directing most new urban development to incorporated cities and existing unincorporated urban communities where public facilities and infrastructure are available or can be provided consistent with the adopted General Plan or Community Plan

to accommodate such growth. This plan assumes approximately 96 percent of new population growth and new job growth will occur within incorporated city spheres of influence and 7 percent would occur in unincorporated areas.

Accordingly, this plan prohibits designation of new areas as Planned Rural Community and restricts the designation of new areas for rural residential development while allowing for the orderly development of existing rural residential areas.

Fresno County recognizes, however, that because of state-mandated directives, including the Regional Housing Needs Allocation, the County may be forced to consider approval of urban development in areas that are not currently planned for such uses. Careful consideration and Board policy direction will be necessary if Fresno County needs to designate new areas for urban development.”

The text above asserts that due to the state’s Regional Housing Needs Allocation (RHNA), the County may be “forced” to consider approval of urban development in areas that are not currently planned for such uses. This concept is troubling for two reasons. First, the County has not provided an explanation as to where such urban expansion might take place. But more importantly, the County’s most recent report to the Department of Housing and Community Development states that the County has a vacant land inventory that’s sufficient to accommodate its RHNA. Below is a citation from the County’s APR for 2022.

“...the remaining inventory can accommodate the following number of units: 5,123 units for the Above Moderate-Income category, 2,480 for Moderate Income Category, and 1,073 units for the Very Low and Low-Income categories. Based on the remaining RHNA obligations that are shown in Table B, the County currently has adequate vacant land inventory to accommodate the remaining number of units in all income categories for the balance of the Fifth-Cycle [Housing Element] Update.” (2022 General Plan Annual Progress Report, page unnumbered, approved by the Board of Supervisors on March 28, 2023.)

The County also proposes to delete six policies from the 2000 General Plan Policy Document.

If the 2023 Draft Policy Document were to be adopted as currently written, there would no longer be a requirement that the County...

- LU-E.17 ...,when reviewing rezoning and subdivision proposals, consider the current inventory of undeveloped parcels designated Rural Residential or Foothill Rural Residential.
- LU-G.15 ...,within a city's planned urban boundary, which the County has designated Reserve on its community plan, (1) establish a limited agricultural zone district prohibiting creation of lots less than twenty (20) acres and (2) consider contracts in accordance with the California Land Conservation Program (Williamson Act).
- LU-G.19 ...,on land that is not within a city's planned urban boundary but is within a city's sphere of influence, (1) maintain zoning consistent with the General Plan or applicable community plan and (2) consider contracts in accordance with the California Land Conservation Program (Williamson Act).
- LU-E.13 ...allow agricultural preserves to be established within areas designated Rural Residential.
- LU-F.37 ...,within the Golden State Industrial Corridor, allow agricultural preserves to be established.
- LU-E.19 ...encourage owners of parcels twenty (20) acres or larger which are outside the sphere of influence of a city to seek redesignation of their land for agricultural uses by establishing procedures that allow the related General Plan Amendment and rezoning applications to be processed without cost to the property owner.



Against the backdrop of the deletions and revisions cited above, the County plans to add two new policies to the Agriculture & Land Use Element: Policy LU-A.23 and Policy LU-A.24.

The Draft EIR asserts that new Policy LU-A.23 will help mitigate the conversion of farmland to nonagricultural uses. However, I do not agree that conducting soil evaluations, providing crop histories, assessing the availability of surface water or considering farmland conservation mechanisms for property proposed for permanent conversion to nonagricultural uses, in themselves, do anything to help conserve farmland.

However, if the policy were to be revised to include standards by which the County could conclude that farmland should not be converted to nonagricultural uses, then the policy might have some utility. Examples of policies in the 2000 General Plan that have such standards are Policies LU-A.3, LU-A.9, LU-B.3, LU-B.7, LU-E.1, LU-E.8, LU-E.23, LU-E.24, LU-E.25, LU-E.26 and LU-E.27. These policies typically read that approval of the new use will be *“subject to the following criteria”* or permitted *“if the following conditions are satisfied.”*

The 2023 Draft EIR asserts that new Policy LU-A.24 will help conserve farmland as well. It won't. If approved, Policy LU-A.24 will require the County to encourage the California Department of Conservation to update its Important Farmland Map to reflect the potential loss of irrigable land due to recently imposed groundwater pumping restrictions and reduced access to surface water. It should be obvious to everyone that this policy in no way helps to conserve ag land. An update of the state's Important Farmland Map may actually encourage conversion of ag land to nonagricultural uses.

Below are summaries of new Policies LU-A.23 and LU-A.24.

If the 2023 Draft Policy Document were to be adopted as currently written, the County would need to...

LU-A.23 ...require discretionary land use projects which propose the permanent conversion of forty acres or more of Prime Farmland to nonagricultural uses to undertake an evaluation of soil type, existing crop history and access to surface irrigation water to support the nonviability of the land for agricultural use.

...consider offsetting the conversion of Prime Farmland through grants of perpetual conservation easements, deed restrictions, establishment of land trusts, etc.

LU-A.24 ...encourage the California Department of Conservation to update its Important Farmland Map in consideration of recent restrictions to groundwater pumping and reduced access to surface water and the potential loss of irrigable land.

**2b. Changes Proposed for Policies and Programs that Indirectly Affect Ag Land Conservation**

Identified below are proposed changes to thirteen policies and programs that will have a an indirect adverse impact on ag land conservation. Some of the effects are subtle, such as those arising from the expansion of tourist-related business opportunities across the county. And others are more obvious, such as the effects that will result from directing urban development of areas of the county where supporting infrastructure does not presently exist but can be provided.

I turn your attention to changes proposed for four policies. Reproduced below are Policies ED-B.19, ED-B.11, ED-B.13 and ED-B.15 — both as currently written and as proposed for revision. Although the changes are subtle, they can, over time, have a significant negative impact on ag land conservation.

If the 2023 Draft Policy Document were to be adopted as currently written, the County would more purposefully promote business opportunities in rural areas of the county. The textual changes are highlighted in blue print.

2000	2023	2000 Text	2023 Draft Text
ED-B.11	ED-B.9	“The County shall encourage the development of visitor-serving attractions and accommodations in unincorporated areas where natural amenities and resources are attractive and would not be diminished by tourist activities.”	“The County shall encourage the development and expansion of businesses serving visitors in unincorporated areas where natural amenities and resources are attractive and would not be diminished by tourist activities.”
ED-B.14	ED-B.11	“The County shall encourage additional recreational and visitor-serving development in the Sierra and foothills areas such as Shaver Lake and Pine Flat.	The County shall encourage development of businesses serving visitors in the High Sierra and foothill areas such as Shaver Lake, Pine Flat, and Squaw Valley.
ED-B.16	ED-B.13	“The County shall encourage coordination in advertising by the Visitor and Convention Bureau and by visitor-serving businesses.”	“The County shall encourage cooperative marketing by destination marketing organizations and tourism stakeholders.”
ED-B.18	ED-B.15	“The County shall initiate a planning process to identify additional recreation opportunities in the coast range foothills and other areas where ‘gateway opportunities’ exist.”	“The County shall promote additional recreation opportunities in the coast range foothills and other areas where ‘gateway opportunities’ exist as a component of the County’s tourism program.”

Listed below are changes proposed for two policies that will increase industrial development in rural areas of the county.

If the 2023 Draft Policy Document were to be adopted as currently written, the County would encourage industry to locate most anywhere in the county. The proposed changes to text are highlighted in blue print.

2000	2023	2000 Text	2023 Draft Text
ED-A.8	ED-A.7	<p>“The County shall encourage the location of new industry within cities and unincorporated communities. The County, in cooperation with the cities will identify circumstances for locating industrial uses in other unincorporated areas consistent with the cities’ economic development strategies and taking into account opportunities offered by variations in local environmental conditions.</p>	<p><i>“The County shall encourage the location of new and expanding industry within Fresno County consistent with the County’s Economic Development, Agriculture and Land Use and Environmental Justice Elements Goals, Policies and Zoning Ordinance.</i></p>
ED-A.23	ED-A.16	<p>“The County shall encourage processing facilities that obtain raw products regionally rather than just locally, including those which may logically be expected to expand into regional processing facilities, to locate in industrial parks under city jurisdiction or within existing unincorporated communities.</p>	<p><i>The County shall encourage processing facilities that obtain raw products regionally rather than just locally, including those which may logically be expected to expand into regional processing facilities, to locate in areas with adequate infrastructure. Processing facilities located in proximity to disadvantaged communities shall comply with the applicable provisions of the Environmental Justice Element.</i></p>

Reproduced on page 12 below are one program and four policies proposed for deletion from the 2000 General Plan. The deletions could pave the way for urban development northeast of Fresno on land currently designated for agriculture.

Just prior to the General Plan being updated in 2000, the County received about a half dozen proposals from developers to change the land use designation for approximately 3,000 acres in the Friant/Millerton area from Agriculture to Residential. The County responded to each proposal with a nearly identical letter saying that urbanization of that area necessitated the development of a regional plan and that planning through 2020 would focus on “expanding and enhancing the area’s recreational activities and resources.” Typical of the County responses was a March 27, 2000 letter from the County to Dirk Poeschel, Land Development Services, Inc. A portion of that letter is reproduced below.

*“On behalf of your client, the Bigelow-Silkwood Friant Ranch, you requested that commercial and residential land use designations be applied to approximately 1,100 acres of land generally located directly south and east of the unincorporated community of Friant. This request was made through several letters from your office and information provided by Mr. Wagner. This proposal and others in the area were taken into consideration in the preparation of the GPU [General Plan Update] documents. After consideration of the projected growth in the County of Fresno and evaluation of land use needs to accommodate growth as well as the unique character of the Friant and Millerton areas it was determined that a Regional Plan should be prepared for the area....The plan is to focus on expanding and enhancing the area’s recreational activities and resources for the near-to-mid-term. It is noted that the area may be suitable for urban development in the long-term, beyond the 2020 time horizon of this General Plan.”*

We are now three years beyond the 2020 time horizon of the 2000 General Plan, and with the pending revision of the plan, the County is proposing to delete from the 2000 General Plan the requirements that the County prepare a regional plan for the Friant/Millerton area and develop the area as a recreation corridor.

Pressure to allow residential development northeast of Fresno has not abated. In a letter to the County dated April 12, 2018, the Building Industry Association of Fresno/Madera Counties proposed that the County consider as part of the revision of the General Plan the redesignation of 3,650 acres in that area from Agriculture to Residential. Printed below is a portion of an August 21, 2018 staff report to the Board of Supervisors.

“Building Industry Association’s Proposal

The Building Industry Association of Fresno/Madera Counties, Inc. (BIA) proposed that your Board consider designating 3,650 acres of land located between the Friant Community Plan and the Millerton Specific Plan for future residential development. This proposal is inconsistent with the scope of the General Plan Review and, in proposing to designate an additional 3,650 acres for residential development, represents a significant change to the scope of the General Plan Review project, as no land use changes were included as a part of the project’s scope. A copy of the BIA’s April 12, 2018 letter is included as Attachment A.”  
(August 21, 2018 staff report to the Board of Supervisors for Agenda Item No. 8: General Plan Review and Zoning Ordinance Update Report.)

It’s my opinion that the requirement to prepare a regional plan and to plan that area for recreation has kept developers at bay and that with the deletion of these two components from the General Plan, the area will be open to numerous proposals for urban development.

As discussed above, if the 2023 Draft Policy Document were to be adopted as currently written, the County would remove the following program and two policies from the General Plan.

LU-H.A ~~“The County shall prepare and adopt a regional plan for the Friant-Millerton area consistent with the directives of Policy LU-H.8”~~

ED-B.13 ~~“The County shall promote the development of the Friant-Millerton area as a major recreational corridor that includes camping, water sports, hiking, golf, conference/hotel facilities, and historic attractions. Facilities should include moderately priced multifamily employee housing.”~~

LU-H.8 ~~“The County shall prepare a regional plan for the Friant-Millerton area. The preliminary study area boundaries for the new regional plan depicted in Figure LU-5 are designed to encompass the area’s major recreation facilities and open space resources, include the area’s existing and potential residential growth areas, but exclude most productive agricultural land. In the near-to-mid-term, planning and development in the area should focus on expanding and enhancing the area’s recreational activities and resources. In the long-term, the area may be suitable for urban development as the unincorporated county’s largest remaining area without productive agricultural soils near the Fresno-Clovis Metropolitan Area and recreational and scenic resources.~~

~~The new regional plan shall at a minimum address the following key issues:~~

- ~~a. Expansion and enhancement of recreation activities and facilities centered on Millerton Lake and the San Joaquin River.~~
- ~~b. Open space and natural resource protection.~~
- ~~c. Implementation of appropriate policies of the San Joaquin River Parkway Master Plan.~~
- ~~d. Groundwater and surface water availability.~~
- ~~e. Wastewater disposal limitations and options.~~
- ~~f. Development of affordable housing, particularly for workers at recreational and related tourist facilities in the area.~~
- ~~g. Suitability of the area for future long-term urbanization and options for how this might occur (e.g., County-specific plan, city annexation, or city incorporation).~~
- ~~h. Provision of an adequate circulation/transportation systems, including mass transit.”~~

OS-H.9 ~~“The County shall plan for the further development of the Friant-Millerton area as a recreation corridor. (See Policy LU-H.8, Administration)”~~

With regard to other areas of the county, the 2023 Draft Policy Document has three new policies that direct the County to study the possibility of future urban development on a total of approximately 10,000 acres in three different locations: east of Fresno near the Kings River, south of Fresno near Highway 99 and three miles north of the Clovis city boundary.

If the 2023 Draft Policy Document were to be adopted as currently written, the County will be required to...

- LU-E.25 ...evaluate a Special Study Area for possible future urban residential, educational, office, and commercial land uses on approximately 7,000-acre acres generally located north of the State Route 180/Trimmer Springs Road interchange.
- LU-E.24 ...expand Rural Residential zoning to cover an approximate 400-acre area generally bounded by Friant Road/Willow Avenue to the west, Garonne Avenue to the south, those parcels immediately east and adjacent to Auberry Road to the east and the Birkhead Road alignment to the north and encompassing those parcels to the west of the full length of Willow Bluff Avenue.
- ED-A.9 ...evaluate a Special Study Area for possible future urban industrial, office and commercial land uses on approximately 2,940 acres generally bounded by North and  
LU-F.38 Avenue to the north, Peach Avenue and State Route 99 to the west, Fowler Avenue to the east and American Avenue to the south.

My comment letter has identified thirty proposed revisions to policies and programs in the 2000 General Plan that, individually or in concert, will weaken ag land conservation. While some changes delete requirements that the County study issues related to farmland conservation; others support increased urbanization of agriculture land.

The revision of the General Plan also weakens County support for the Williamson Act, and proposed changes promote the location of industry and expansion of business opportunities in unincorporated areas of the county.

Of great concern are revisions proposed for Policy LU-A.1 and for the General Plan theme of *“Urban-Centered Growth,”* which together give the nod to increasing urban development throughout the county by directing development to areas of the county where essential infrastructure does not yet exist but can be provided.

The EIR fails to recognize that these thirty changes run counter to the General Plan Goal to promote the long-term conservation of agricultural lands.

With regard to the one new policy that purports to benefit ag land conservation — Policy LU-A.23, which requires, as part the process to convert ag land to nonagricultural uses, an evaluation of soil type, existing crop history, access to surface irrigation water and the consideration of offsetting conservation measures, it’s important to note that the General Plan already contains Program LU-A.F and Policy LU-A.16, which together serve the same purpose, as they both promote and support the implementation of agricultural land preservation programs for the long-term conservation of viable agricultural operations. So there’s a question in my mind as to whether new Policy LU-A.23 is actually needed.

### 3. Dissimilar Findings in the 2000 and 2023 EIRs; The Absence of Mitigation Monitoring

The EIR that was prepared for the 2000 General Plan update concluded that there were four adverse impacts related to farmland conservation and agricultural production that could not be reduced to a level of insignificance and would, therefore, remain significant and unavoidable. Even so, to reduce those impacts, the Board of Supervisors adopted 35 policies from Sections LU-A and LU-B of the Agriculture and Land Use Element to serve as measures to mitigate the impacts.

Reproduced below is an image of Table 3-1, which summarizes the impacts and mitigation measures that were considered by members of the board of Supervisors when they adopted the General Plan Update in 2000. According to the EIR prepared for the update, development under the 2000 General Plan...

1. Would result in the permanent loss of important farmland.
2. Would result in a significant reduction in agricultural production.
3. Would result in increased non-renewal and cancellation of Williamson Act contracts.
4. Could, cumulatively speaking, result in the permanent loss of important farmland, a significant reduction in agricultural production, and an increase in the non-renewal and cancellation of Williamson Act Contracts.

TABLE 3-1 REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES (AUGUST 2000)						
Impact(s)	Level of Significance Prior to Mitigation		Mitigation Measure(s)	Level of Significance After Mitigation		
	County	Non-County <sup>1</sup>		County	Non-County <sup>1</sup>	
<b>4.3 Agriculture</b>						
4.3-1 Development under the Draft General Plan would result in the permanent loss of important farmland.	S	S	4.3-1 None available beyond Draft General Plan Policies LU-A.1 through LU-A.21, Programs LU-A.B and LU-A.D, and Policies LU-B.1 through LU-B.14 for Fresno County. No mitigation measures are available to the County to reduce impacts occurring within the cities' jurisdiction.	SU	SU	
4.3-2 Development under the Draft General Plan would result in a significant reduction in agricultural production.	S	S	4.3-2 None available beyond Draft General Plan Policies LU-A.4, LU-A.6, LU-A.7, LU-A.10, LU-A.11, LU-A.19 through LU-A.21, Programs LU-A.B and LU-A.D, and Policies LU-B.5 through LU-B.7 for Fresno County. No mitigation measures are available to the County to reduce impacts occurring within the cities' jurisdiction.	SU	SU	
4.3-3 Development under the Draft General Plan would result in increased non-renewal and cancellation of Williamson Act Contracts.	S	S	4.3-3 None available beyond Draft General Plan Policies LU-A.16, LU-A.17, and LU-B.14 for Fresno County. No mitigation measures are available to the County to reduce impacts occurring within the cities' jurisdiction.	SU	SU	
4.3-4 Development within Fresno County, in conjunction with other development within the San Joaquin Valley, could result in the permanent loss of important farmland, a significant reduction in agricultural production, and an increase in the non-renewal and cancellation of Williamson Act Contracts.	S	S	4.3-4 None available beyond Draft General Plan Policies LU-A.1 through LU-A.21, Programs LU-A.B and LU-A.D, and Policies LU-B.1 through LU-B.14.	SU	SU	

S — Significant      SU — Significant and Unavoidable

In sharp contrast, the EIR prepared for the 2023 revision of the General Plan concluded that just two adverse impacts were significant and unavoidable and that there were only two policies — both new — that could lessen those impacts. The 2023 EIR did not consider for possible adoption any of the 35 mitigation measures adopted by the Board of Supervisors in 2000.

Reproduced below is an image of the summary of the impacts and mitigation measures that appears in the Draft 2023 EIR. According to the 2000 EIR, development under the revised plan...

1. Could result in the conversion of farmland.
2. Could result in conflicts to existing zoning for ag uses and to Williamson Act contracts.

Agriculture		
<p><b>Impact AG-1.</b> The GPR/ZOU is designed to encourage the continued operation of existing agriculture lands and Forest lands in The Planning Area. However, buildout of the GPR/ZOU could result in the conversion of Farmland or forestland to non-agricultural use. Therefore, impacts would be significant and unavoidable.</p>	<p><i>AG-1: Agriculture Conservation.</i></p> <p><b>Policy LU-A.23</b></p> <p>The County shall require discretionary land use projects which propose the permanent conversion of forty acres or more of Prime Farmland (as designated by the Farmland Mapping and Monitoring Program) to non-agricultural uses to undertake an evaluation of soil type, existing crop history and access to surface irrigation water to support the non-viability of the land for agricultural use. Should documentation indicate a loss of productive agricultural land would occur due to project development, consideration shall be given to offsetting land conversion through grants of perpetual conservation easements, deed restrictions, establishment of land trusts, in-lieu fee payment program or other County-approved farmland conservation mechanisms for the purpose of preserving agricultural land. This policy does not apply to land zoned or designated in the General Plan for non-agricultural land uses.</p> <p><b>Policy LU-A.24</b></p> <p>The County shall encourage the State of California Department of Conservation to update its Important Farmland Map in consideration of recent restrictions to groundwater pumping, reduced access to surface water and the potential loss of irrigable land.</p>	<p>Significant and Unavoidable</p>
<p><b>Impact AG-2.</b> Buildout of the GPR/ZOU could result in conflicts to existing zoning for agricultural uses and Williamson Act contracts. Therefore, impacts would be significant and unavoidable.</p>	<p>None feasible.</p>	<p>Significant and Unavoidable</p>

Now whether the County lessens impacts to agriculture through the adoption of 35 mitigation measures, as it did in 2000, or through the adoption of two measures, as it may do in 2023, there is this underlying problem: the County has not and will not create a program to monitor the implementation of those mitigation measures.

While in attendance at the County’s community workshop on the General Plan Review and Zoning Ordinance Update held at the Woodward Park Library on June 19, 2023, I asked a County planner and a consultant from the firm preparing the EIR (Rincon Consultants, Inc.) whether the General Plan, as planned for revision in 2023, would continue to be “*self-mitigating*,” as there was no mention in the 2023 Draft EIR that it would be. Both individuals assured me that the plan would continue to be self-mitigating.



A definition of self-mitigation appears in the EIR prepared for the 2000 General Plan. Text on page 1-4 of the 2000 EIR describes how self-mitigation is supposed to work.

“The [2000] General Plan Update is intended to be self-mitigating; it is assumed impacts identified in this EIR would generally be mitigated through adopted federal, State, and local laws and regulations, through the implementation of identified General Plan policies for unincorporated areas of the County, or some combination thereof, rather than through measures independent of the General Plan.”

Unfortunately, the assumption in 2000 proved wrong. Self-mitigation has not worked. A sizable number of the 304 policies adopted as mitigation measures in 2000 were never implemented — some not at all and others not as written — and the County never once kept watch on the situation.

And so, when the County published a Notice of Preparation (NOP) of an EIR for the revision of General Plan in 2018 and then again in 2021, the League of Women Voters of Fresno and I wrote comment letters asking those preparing the EIR to evaluate the County’s failure to monitor the implementation of adopted environmental mitigation measures.

In commenting on the 2018 NOP, the League of Women Voters of Fresno wrote:

“It’s important to note that the County has not established a program to monitor implementation, and although General Plan Program LU-H.D contains a mechanism for a mitigation measure monitoring program, the County has chosen not to utilize it. And it’s also important to note that when the General Plan was adopted in 2000, the belief among County staff, elected officials and EIR consultants was that the General Plan would be “*self-mitigating*,” but that assumption has proven incorrect....

Therefore, the League urges the County to (1) evaluate the cause for and the extent of the County’s inability to implement mitigation measures in the 2000 General Plan, since many of these same policies will be carried over into the new Plan, (2) describe in measurable terms the physical effects of any adverse impacts that remain significant after mitigation, (3) determine the amount of funding needed to fully implement mitigation measures so that implementation is assured, [and] (4) determine the conditions under which General Plan “*self-mitigation*” can work....” (May 4, 2018 letter from the League of Women Voters of Fresno to the County of Fresno, page 2.)

In response to this comment by the League of Women Voters of Fresno, the County replied, “*This comment pertains to the General Plan. This comment does not pertain to the scope and contents of the EIR.*” (2023 Draft EIR, page 1-13.)

The County's response was in error. It goes without saying the County's long history of not conducting environmental monitoring must be addressed in the 2023 EIR.

Three years later, in response to the 2021 NOP, I raised the same issue, writing:

"The Failure of Self-Mitigation

There is an erroneous assumption in the design of the 2000-2020 General Plan, namely, that the plan, environmentally speaking, is self-mitigating.

Self-mitigation requires that the 304 policies that were adopted as mitigation measures are fully implemented....How many mitigation measures are not being implemented is unknown because from the time of plan adoption in 2000 to the present day, the County has not systematically monitored the implementation of these policies.

The failure to implement Policy OS-D.4 serves to illustrate the problem. At the time of General Plan adoption in 2000, the Board of Supervisors adopted mitigation measures for every adverse impact identified in the 2000 EIR....One such impact was the potential loss of riparian habitat.

Impact 4.9-1:

*'Development under the Draft General Plan could result in the loss of wetland habitat.'*

Mitigation Measure 4.9-1:

*'None available beyond Draft General Plan Policies OS-D.1 through OS-D.8.'*

Policy OS-D.4:

*'The County shall require riparian protection zones around natural watercourses....'*

Program OS-D.B:

*'The County shall adopt an ordinance for riparian protection zones identifying allowable activities in riparian protection zones and allowable mitigation techniques.'*

With respect to the adoption of an ordinance to protect riparian areas, self-mitigation would have been successful had the County actually implemented Program OS-D.B, but the County didn't implement it. The County's Annual Progress Report on the implementation of the General Plan for calendar year 2019 stated that the County had not adopted the riparian ordinance required by Program OS-D.B. Notwithstanding the County's claim that riparian areas are nonetheless protected, the fact remains that the County has no riparian ordinance and no riparian protection zones. And because mitigation measure 4.9-1, which includes

Policy OS-D.4, was not fully implemented, there is no guarantee that riparian habitat is being protected to the extent anticipated by the 2000 EIR and envisioned in the General Plan.

As part of the environmental review of the revision of the General Plan, the County needs to...

1. Evaluate the cause for and the extent of the County's inability to implement the mitigation measures adopted for the 2000-2020 General Plan, since many of these same policies will be carried over into the 2020-2040 General Plan.
2. To ensure that mitigation measures are implemented, determine the amount of funding needed to guarantee full implementation.
3. Determine the conditions under which General Plan self-mitigation can work."  
(March 1, 2021 letter from Radley Reep to the County of Fresno, pages, 1-3.)

In response to my comments, the County once again asserted that the assessment of mitigation monitoring was outside the scope of the EIR, saying, "*This comment pertains to the General Plan. This comment does not pertain to the scope and contents of the EIR.*" Not good!

It's significant to realize that the 2023 Draft EIR does not include a mitigation monitoring program — not even for the twelve mitigation measures listed in the document. Oddly enough, the draft EIR does cite on pages 1-22 and 1-23 the requirement to adopt such a program. The text reads...

"According to Section 15091 of the State CEQA Guidelines:

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures." (2023 Draft EIR, page 1-22.)

"Mitigation Monitoring/Reporting Program. When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects." (2023 Draft EIR, page 1-23.)

At the time the General Plan was last updated in 2000, the associated EIR specifically identified policies that supported ag land conservation. The text on page 4.3-3 read, "*The Draft [2000] General Plan contains the following policies to support the goal of long-term preservation and protection of agricultural resources.*" What followed was a list of the 27 policies that were said to specifically support ag land conservation. All were adopted as mitigation measures. Knowing that the County failed to subsequently monitor the implementation of those 27 policies, there's every reason to question whether the County will take seriously the implementation new ag land Policies LU-A.23 and LU-A.24. I believe the County is unlikely to change long-held practices.

To review, I've identified interrelated concerns about the 2000 General Plan and its pending revision in 2023: oddly dissimilar findings with dissimilar mitigation in the 2000 and 2023 EIRs, the futility of self-mitigation and the wholesale absence of mitigation monitoring.

With respect to this last item — the lack of mitigation monitoring, there are three factors to consider:

- Twenty-three years ago, the EIR prepared for the 2000 General Plan Update asserted that a mitigation monitoring program would be prepared. Printed below is text from the 2000 EIR pledging that every mitigation measure identified in that EIR would be monitored.

“The Mitigation Monitoring Program for the General Plan will be prepared for all mitigation measures identified in the EIR. The Mitigation Monitoring Program will be considered by the Board of Supervisors in conjunction with approval of the General Plan and certification of the EIR.” (2000 Final EIR, page 1-7.)

“The mitigation measures presented in the EIR will form the basis of the Mitigation Monitoring and Reporting Program (MMP).” (2000 Draft, page 3-3.)

“Section 15126.4 of the CEQA Guidelines specifies the requirements pertaining to mitigation measures. Specifically, 15126.4(D)(2) states ‘mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments’ ....Mitigation measures, which reflect specific policies such as LU-A.15 (see Mitigation Measure 4.3-1), have not been deferred to a later date, as suggested by the commentor. The mitigation measures would be implemented and enforced through a mitigation monitoring program (MMP).” (2000 Final EIR, page 3-75.)

- The 2023 Draft EIR does not contain, nor does it propose the preparation of, a mitigation monitoring program for the 2023 revision of the General Plan.
- If the 2023 Draft Policy Document were to be adopted as currently written, reference to Public Resources Code Section 21081.6 (the state’s monitoring requirement) would be deleted from the plan. Printed below is the proposed revision of Program LU-H.A:

“The Planning Commission shall review the General Plan annually, focusing principally on actions undertaken in the previous year to carry out the implementation programs of the plan. The Planning Commission’s report to the Board of Supervisors shall include, as the Commission deems appropriate, recommendations for amendments to the General Plan. ~~This review shall also be used to satisfy the requirements of Public Resources Code 21081.6 for a mitigation monitoring program.~~” (2023 Draft Policy Document, page 3-12.)

I feel the county must incorporate into the EIR (1) an assessment of the County's long-standing practice not to engage in mitigation monitoring and (2) a discussion of and a plan for future mitigation monitoring.

The County must also evaluate each of the 304 policies that were adopted as mitigation measures in 2000 to determine whether, individually or collectively, they have the capacity to lessen impacts and should, therefore, be recognized as mitigation in the 2023 Draft EIR.

As an aside, with regard to the analysis of cumulative impacts, I believe the 2023 Draft EIR contains an error. It fails to report in the Summary of Environmental Impacts and Mitigation Measures (Table ES-1) a cumulative impact which is significant and unavoidable. Evidence of the mistake is found on page 4.2-14. That paragraph is printed below.

"The cumulative impacts of projects facilitated by the GPR/ZOU could result in the conversion of agricultural land. Full buildout of the GPR/ZOU could cause the conversion of agricultural lands in the Planning Area.... While General Plan policies attempt to reduce impacts to agricultural resources, they would not ensure the preservation of all agricultural land in the Planning Area, therefore impacts [sic] cumulative impacts to agricultural lands would be significant and unavoidable."

#### 4. Project Alternatives

In its May 4, 2018 comment letter on the Notice of Preparation of an EIR, the League of Women Voters of Fresno recommended a "*No-Harm*" alternative. The letter read in part as follows:

"Include in the range of reasonable alternatives a no-harm alternative (i.e., one without impacts harmful to the environment) so that the Board has an opportunity to understand the full environmental cost (physically and financially) of adopting a General Plan with significant and unavoidable adverse impacts." (May 4, 2018 letter from the League of Women Voters of Fresno to the County of Fresno, page 2; 2023 Draft EIR, page 738/817.)

The County's response, as recorded on page 1-13 of the 2023 Draft EIR, was this: "*Alternatives for the GPR/ZOU are evaluated on Section 6, Alternatives.*"

The Alternatives section of the 2023 Draft EIR does not comment on the request for a No-Harm Alternative. It may be that consultants preparing the Draft EIR felt that such an alternative had little chance of succeeding — and that may prove to be true — but with regard to an impact that seems unavoidable, such as the loss of agricultural land, a no-harm approach to environmental review may create a path toward finding new mitigations that are feasible and surprisingly effective.

Case in point: A no-harm analysis supporting ag land conservation would start with the premise that it's possible to develop policies and mitigation measures that ensure there is no net loss of agricultural land over the life of the plan, or more precisely, no loss greater than what can already occur as a result of buildout under existing entitlements. A no-net-loss policy could be developed along the lines of Policy OS-A.9 for water banking or Policies OS-D.1 and OS-D.2 for wetlands protection. It could be as simple as saying that if there is a request to convert agricultural land to nonagricultural uses that the project applicant (individual, company or agency) would need to fund the restoration of an equal amount of land where the ability to farm has been compromised by nonagricultural uses.

Such an approach would have a myriad of benefits. For example, it would lessen urban sprawl, compel cities to evaluate their respective land use plans with regard to density and the efficient use of land, fund projects within cities to return land to agricultural uses and make apparent the true need to convert ag land to nonagricultural uses.

But if County staff or if environmental consultants begin the process of preparing an environmental impact report with an assumption that it's not possible to develop land use policy that causes no harm, then, as I see it, there's really no point to conducting environmental assessments.

In addition to a "No-Harm" alternative, I recommend that the County consider an alternative that's a highbred of the current 2000 General Plan and the proposed 2023 revision. Given my earlier reasoning that the 2023 Draft General Plan will cause greater loss of ag land than will the existing 2000 General Plan, I suggest an alternative that includes all of the program and policy changes required by law but none of the discretionary changes that will lead to further loss of agricultural land, such as the thirty policy and program changes I discussed earlier in this comment letter. With respect to the conservation of agricultural land, such an alternative would be superior to all three alternatives in the Alternatives section of the Draft EIR and superior, as well, to the 2023 Draft General Plan.

I ask that the 2023 EIR include an explanation as to why a No-Harm Alternative is not suitable for this project as a whole or with respect to individual components of the project. I believe such an approach has the potential to reduce to a level of less-than-significant impacts that are now thought to be significant and unavoidable.

## **5. Addition of an Indicators Program**

Several months prior to the adoption of the current 2000 General Plan, in a letter to the Fresno County Planning Commission, the League of Women Voters of Fresno recommended that the County develop an "indicators program" to serve as a tool to evaluate progress toward the

attainment of General Plan goals. Indicators are data of various types which, when collected over a period of time, indicate whether particular goals are being met. For example, to measure the success in achieving the County's goal to conserve agricultural lands, the County could annually track the amount of acreage lost to urban uses.

The Planning Commission endorsed the concept, and the Commission's first Annual Progress Report on the implementation of the 2000 General Plan devoted twelve pages to the concept. On August 26, 2003, the Board of Supervisors directed its planning staff to return with a plan to implement an Indicators Program "*on a regular basis.*" (Board minutes, August 26, 2003.)

The County's first draft revision of the 2000 General Plan (August 2010) contained a new program directing the County to develop an indicators program. The proposed program read as follows:

**New Program LU-H.C**

*"The County shall develop an Indicators Program that monitors the success of the County in achieving the goals of the General Plan. The County shall conduct an annual review of the Indicators Program and report the findings to the Planning Commission and Board of Supervisors."*

This same language was retained in the next four drafts of the General Plan; however, with the release of the sixth draft revision (December 2017), the County removed the new program from consideration.

Because an Indicators Program would help the County track progress toward achieving General Plan goals, I heartedly recommend that the program be reinstated. Absent an indicators program, there is no way for elected officials and county residents to know if General Plan goals are being met — whether the General Plan is working as envisioned or whether it needs restructuring.

## **6. An Elephant in the Room**

In 2019, the League of Women Voters of Fresno published a study which found that the County was able to demonstrate successful implementation of only a third of the implementation programs in the 2000 General Plan. This is, by most standards, a failing grade, and the lack of progress has huge ramifications. The study, titled "*Annual Progress Report for the County of Fresno Prepared by the League of Women Voters of Fresno, March 2019,*" is attached to this comment letter.

The 121 programs in the first six elements of the 2000 General Plan (excluding the Housing Element and new Environmental Justice Element) are designed to ensure that important land use policies are successfully executed and that, as a result, General Plan goals are achieved. But because of the failure to execute implementation programs as written, and because of lack of interest on the part of elected officials and County planning staff to discuss the problem openly, there is really no way for county residents to know the extent to which General Plan goals are not being met.

This lack of implementation is the elephant in the room — not only because it's a serious problem that people in government are disinclined to talk about, but because it can lead to unexpected and unwanted consequences.

The consequence for those preparing the 2023 Draft EIR is this: They may be reviewing the wrong plan.

It's important to understand that the General Plan of today is very different from the plan envisioned in 2000. And why is that? Well, it's not because the plan underwent significant amendment over the past twenty-three years; it's because plan implementation was abandoned. More specifically, the County abandoned its responsibility to implement dozens of programs — the drivers that ensure the achievement of General Plan goals.

And why was that? The County claims the problem is related to a lack of funding. But in all fairness, one can't know that for sure because County planning staff and elected officials are loathe to talk about the problem publicly.

The truth of the matter is that one can make a reasonable argument that the County really has two plans — the one that was approved in 2000 and the one that functions today. And what about the EIR prepared in 2000? Which of the two plans does it cover — the one on paper or the one that's in effect?

Given the County's predilection for finding creative ways to avoid or sidestep implementing the General Plan as written, there is a very strong possibility that those preparing the 2023 Draft EIR are assessing the wrong plan. They're engaged in reviewing a plan that, practically speaking, is not the plan that will govern future decision-making. It's a bit like having two sets of company books — one for government review and one for the office.

If the Draft EIR is to have some legitimacy, then the plan under review must be the plan that's going to be implemented. And if plan implementation is dependent on adequate funding, then the Draft EIR must, of necessity, include an analysis of the County's ability to fund plan implementation.



If a financial analysis should show that the County is unable to implement, as written, the General Plan as revised for 2023 and will, of necessity, operate in ways that are contrary to or inconsistent with adopted policies and programs, then the County will either need to create a plan it can afford to implement or abandon the current revision altogether.

I ask the County to include in the Draft EIR or to prepare as a separate companion study, an analysis of the funding needed to implement the pending revision.

I appreciate the opportunity to comment on the Draft EIR for the revision of the 2000 General Plan.

Sincerely,

Radley Reep

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June 27, 2023

Chris Motta | Principal Planner  
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**RE: Difficulty Understanding the Nature of General Plan Amendment No. 529 (General Plan Review) and the Scope and Content of the Associated Draft Environmental Impact Report.**

I've been actively engaged in the review and revision of the General Plan Policy Document (**project**) from the time the County began the process seventeen years ago. Over that time, I've witnessed significant changes in both the Project and process used to complete it.

To my dismay, I've found the County to be anything but straightforward with the public when it comes to clarifying whether the project is a comprehensive General Plan update or an amendment to the existing plan resulting from the five-year review begun in 2006. As explained below, the lack of clarity makes uncertain my ability to effectively comment on the project and draft EIR.

**2006 — 2014**

The process to revise the General Plan began in late 2005 and proceeded in fits and starts for the next eight years. On July 26, 2012, County staff concluded that the "Five-Year Review" of the 2000 General Plan Policy Document didn't warrant the preparation of an EIR, and on February 11, 2011, the County published a Notice of Intent to Adopt a Negative Declaration.

A year later, on July 26, 2012, the Planning Commission recommended that the Board of Supervisors adopt the Negative Declaration and approve the Five-Year-Review (revision of the 2000 Policy Document). The Board considered the matter on December 4, 2012 but put off making a decision.

A year and a half later, on August 14, 2014, the County released for public review a new draft revision of the Policy Document. Then, at a public hearing held September 30, 2014, the Board of Supervisors made an unexpected move. It voted to require the preparation of an EIR for a project that was at that time still considered a "Five-Year-Review" of the 2000 General Plan.

Up to this point, there was no hint that the County was updating the General Plan. The review would simply bring the General Plan into compliance with changes in state law and determine which policies and implementation programs had served their purpose and should be deleted and which should be modified to reflect changed conditions and shifts in Board priorities.

## 2015

Up to this point, I'd been puzzled about the true nature of the "Five-Year-Review." However, my bewilderment was diminished somewhat when I heard what planners had to say at an October 13, 2015 Board of Supervisors hearing to approve an amended scope of work for the review of the General Plan and the preparation of an associated EIR.

Printed below is the action recommended by staff and subsequently approved by the Board:

### "RECOMMENDED ACTION:

1. Consider and approve proposed Scope of Work prepared for the General Plan Five-Year Review, Zoning Ordinance Update and associated Environmental Impact Report...." [October 13, 2015 staff report to the Board of Supervisors for Agenda Item No. 11, page 1.]

At that October 13, 2015 hearing, staff made it clear to everyone attending the board meeting that the review of the General Plan Policy Document did not constitute an "update" of the plan and that the associated EIR would evaluate only those portions of the Policy Document that were being revised.

Below are citations from a transcript of that hearing. The speakers are...

**Debbie Poochigian:** Board Chairperson  
**Will Kettler:** Planning Department Staff  
**Bernard Jimenez:** Planning Department Staff  
**Mary Savala:** Member of the League of Women Voters of Fresno  
**Radley Reep:** Member of the League of Women Voters of Fresno

[Key statements from the transcript are underlined. My notes are in blue type.]

**Poochigian:** This [the Five-Year Review of the General Plan] is a review. The next revision would be required when? It's going to— This expenditure of a million dollars [for the revision of the General Plan and preparation of an EIR]— Is this going to help us on the revision side?

**Kettler:** It's still a review. I believe the planning horizon for the document will be expended — or extended, pardon me — to add years to when the document would need to be updated in the future.

**Poochigian:** So it will at least move the revision date out.

**Kettler:** Yes, ma'am, the update date. Yes, and again, this is not an update. This is a review. We are doing, as noted, and very importantly, a General Plan — or pardon me — a Zoning Ordinance update. And one point we made in June\* was that currently there is no environmental impact report for the Zoning Ordinance, Ordinance, so this— If we are to move into the realm of an EIR, it allows us to more solidly also present and bring to your Board an update of these other items.

[\* At that June 2, 2015 hearing, which resulted in supplementary board direction to staff regarding the review of the plan, Radley Reep submitted information supporting the need to “completely revise the 2000 EIR.”]

**Savala:** The Administrative Draft Policy Document revisions in Phase 2, Task 1\*\* include a revised planning horizon to 2040. Where did that extension of the planning horizon come from? And what implications does it have for a five...five-year review of the General Plan and a full update of the General Plan in the future?

[\*\* Ms. Savala was referring to text in the Scope of Work (dated August 6, 2015) for the review of the General Plan , which is printed below:

### **“Phase 2: Policy Document Revision**

#### **Task 2.1 Administrative Draft Policy Document Revisions**

The Consultants will revise the existing draft General Plan Policy Document (September 2014) based on public comments provided to the County, to address State Planning Law...and to reflect a revised planning horizon (e.g., 2040). The Policy Document will also be prepared as the County’s qualified plan for the reduction of greenhouse gas emissions pursuant to CEQA Guidelines Section 15183.5(b).” [October 13, 2015 Scope of Work, page 3; my underlining.]

**Reep:** Will the EIR being contemplated review the entirety of the existing Policy Document or only those portions that are subject to the revision?

**Poohigian:** I think that’s a trick question, so why don’t you [addressing staff] take a minute.

[The recording did not pick up staff's comments, which were followed by laughter from Board members.]

**Kettler:** **This is still a General Plan review.** The EIR is being prepared at the direction of, of the Board, and the EIR will have the correlating impacts as I mentioned of, of affecting the General — the Zoning Ordinance update. **But it's still a review; it's not an update.** We have a review that was presented in September of '14. That is at this time the direction that we are moving toward. We've had, of course, meetings before the Board, meetings with the public, and meetings with Board members individually as directed by the Board. However, there is a scope identified in the Agreement, and in that scope, there will be public meetings, and there will also be meetings that occur at the public hearing setting, in which case, direction may change. So, **I really don't understand the question. It's a review still.** We have a redline version that's on the G-drive — no, on our, on our Internet website, and direction may or may not change through the process.

**Poochigian:** [addressing Mr. Reep] Do you want to tell him what part of the trick question [unintelligible] is?

**Reep:** [laughter] I didn't mean for it to be complicated — a trick question. The proposal is to revise a portion of the policies of the General Plan, and the question is whether the environmental assessment will just look at those or whether it's going to look at the entire policy document and analyze it environmentally. I think it's a simple question.

**Poochigian:** Well, you're talking about the economic portion and all of that. Is that what you're trying to get at?

**Reep:** The question is whether it's going to be a complete, comprehensive environmental review or just narrowly focused to the revisions. That's the question. And I'm hearing it's going to be...?

**Jimenez:** If there, **if there are no changes to the existing policy, then there would be no review of that particular policy,** so we are looking at the proposed revisions.

**Reep:** OK. I understand now.

I came away from that meeting believing that adoption of the General Plan “Five-Year Review” would extend the planning horizon of the 2000 General Plan from 2020 to 2040 so that the General Plan would have a 40-year life — from 2000 to 2040. Furthermore, I came to believe that the associated EIR would analyze only those policies that were recommended for revision.

From that moment on, I focused my attention on the proposed revision of the Policy Document and on the effect those changes might have on the environment.

## 2017

But as time passed, there were statements by County officials that led me to believe that the County was moving away from a simple review of the 2000 General Plan and more toward a complete overhaul of the General Plan, which, to my way of thinking, would have constituted a plan “update.”

For example, at a January 31, 2017 Board hearing to discuss economic development (Board Agenda Item No. 9), planner Bernard Jimenez referred to the pending review of the General Plan as a plan “update.” Below are statements by Supervisor Borgeas and Mr. Jimenez from that hearing.

**Borgeas:** How long ago did the County of Fresno divest from the economic development game? Was that back in early 2000? When was that, Bernard [Jimenez]? Do you remember?

**Jimenez:** Shortly after the General Plan was adopted, the County put a lot of effort into economic development by establishing positions even within the CAO’s office and created an economic development team. I would say that the, when those positions went away, which is probably around 2006, 7, 8 – right around there. It’s kind of where the County stopped focusing its efforts primarily on economic development simply because the positions went away. So [unintelligible] we were entering the recession and we, frankly, have not gathered any momentum since then.

**Borgeas:** I’m thinking that we revisit this issue in a formal way and maybe start off with the idea of...what do we have that we can play with because the Rapid Response Team I thought was a good idea even though it was relatively small.

**Jimenez:** And Supervisor [Borgeas], one thing to remind the Board or to make the Board aware of, frankly, because of the new Board members is that, you know, we are in the process of revisiting and reviewing and **updating our General Plan.**

A week later, on February 7, 2017, during a Board hearing to discuss procedural rules for public hearings (Agenda Item No. 6), planner Bernard Jimenez again referred to the pending review of the General Plan as a General Plan “update.” Below are exchanges between Supervisor Borgeas and Mr. Jimenez.

**Borgeas:** When are we going to delve into the de novo review discussion and what our role is? Is that going to come up in the next couple of months? When are we looking at that?

**Jimenez:** We were actually proposing to address that as part of our Zoning Ordinance update. We can break that off and do it separate, and, but it really depends on what your Board decides.

**Borgeas:** The matter was going to be brought back, and I’m just asking when it’s going to be brought back.

**Jimenez:** So if we do it as part of our Zoning Ordinance update, that would likely — At least 12 months because simply in terms of our timeline where we’re at with our **General Plan update.**

On May 15, 2017, in advance of a Board hearing scheduled the following day to discuss the “status of the General Plan Review” (Agenda item No. 15), the League of Women Voters sent an email letter to all members of the Board of Supervisors asking whether the Five-Year Review of the General Plan had been transformed into a plan update. Below are portions of that letter.

“May 15, 2017

Re: Board Agenda Item #15: Status of the Review of the General Plan

Dear Members of the Board of Supervisors:

**Fresno County residents need a clear statement from you as to whether the County is, in fact, in the process of updating its General Plan Policy Document.**

Although the County maintains that it is not updating its General Plan Policy Document, there is every reason to believe that it is. The evidence for it is (1) the large percentage of policies that are proposed for significant revision, (2) the necessity to amend a majority of the Plan's implementation programs, (3) the replacement of the EIR for the current General Plan, (4) the update of a major component of the General Plan – the Background Report, (5) the recommended doubling of the life of the General Plan, and most importantly, (6) the report from the County to the Office of Planning and Research stating that the County is, indeed, conducting an update of its General Policy Document.

The County maintains that it is not conducting an “update” of its General Plan Policy Document, that instead, it is completing a “5-year review” that was begun 12 years ago (in 2005). Despite the County's claim that it is not updating its Policy Document, there is strong, credible evidence to the contrary.

**The League of Women Voters of Fresno respectfully asks the Board...to acknowledge that the County is, in fact, in the process of updating its General Plan Policy Document and, additionally, to take the steps necessary to fully engage county residents in that process.”**

During the public hearing held the following day, May 16, 2017, there were these short exchanges between Supervisor Borgeas, Supervisor Pacheco, Daniel Cederborg (County Counsel) and planners Bernard Jimenez and Will Kettler.

**Borgeas:** **We heard from one of the speakers [Radley Reep, representing the League of Women Voters of Fresno] on the insistence that we call this an update. Can you explain the implications of that terminology and what exactly we are doing?**

**Jimenez:** We are amending our General Plan, and it's a General Plan amendment so irrespective of the terms that folks want to associate with it, **we are amending our General Plan. That's simply what it is.**

**Pacheco:** The only thing, Counsel [Daniel Cederborg], I would just add— This is a little bit out of my pay grade. **This issue between update and review.** Supervisor Borgeas touched upon that, but **what is the significance of those terms, please?**

**Counsel:** Well, one, I— **There will be certain things that if you're doing a full update that would definitely be required.**



Pacheco: OK.

Co. Counsel: You've heard the advocates talk about how the process that we are going through probably is one that would require those things anyway. **That is a gray area in which the discussion would continue on, if as to whether it is a review or an update. I think that this Board needs to define with staff at this stage,** you know, the Board did take the step in terms of doing the full EIR at this point. **As to, you know, what staff's feeling is about that, you know, that was asked but I don't think we got the answer just yet as to exactly where the Board wants to go with that review versus update because that can change legal opinions, for instance, that our office gives in terms of some of the things that might, you know, need to be** [unintelligible, probably the word "included"].

Pacheco: OK, then I have another question for staff. Granted— Given what we've heard today, that our current Plan — I believe the term is 'expires' in 2020 —or what is the term?

Jimenez: It doesn't expire. We do have a [2000 – 2020] planning period where assumptions are made for various land use policies but it doesn't have an expiration date.... We are going through a process to extend that because, as one of the speakers [Mr. Reep] said, that planning 20-year period is about on us already, so it makes sense to go ahead as we go through this process to extend that out.

Pacheco: So what is our plan, then? You know, we're not— I don't have— They said we're kind of like, you know, cloak and mirrors. I don't really have any cloak and mirrors. I want to know what is our plan.

Jimenez: Well, fundamentally—

Pacheco: And I'm OK to say it in public.

Jimenez: Fundamentally, **our land use policies are proposed to essentially remain the same:** directing growth to the cities, preserving ag land, I mean, there's no smoke and mirrors about that.

Pacheco: OK.

**Jimenez:** Now you've heard comments about significant changes to policies. We're going to agree to disagree because I think the characterization of what are being proposed are not accurate but, there will be an opportunity to have that discussion....

**Kettler:** A couple of points, if I may, Mr. Chairman and members of the Board. One very important issue that the County is not undertaking that as most jurisdictions do is that there has been no change to land use designations or development intensity proposed with our review. **The reason why our review has taken so long and has been morphing into more complex [unintelligible at 2:26:13] is because various groups — some present today — have come to the Board and asked for certain things to be included. The environmental impact report is beneficial to the County because it will entail a Zoning Ordinance update as well, and we were very clear with the Board in 2013 that the Zoning Ordinance currently does not have an EIR backing for it. So that's really where the real benefit is.** The Zoning Ordinance effort is going concurrently with this. The General Plan review – or amendment – as Bernard [Jimenez] says, which is completely accurate, is really in the same state and same intensity as it was when we first approached the Board [in 2012 with a request to adopt a Negative Declaration]. **We were doing a Negative Declaration and proposing that because, again, we were actually ratcheting down development entitlements rather than adding to them as most jurisdictions do.** A lot of jurisdictions – those from the city – will know that when you do a General Plan update, you're adding land and adding urbanization. **This plan does nothing like that. As a matter of fact, as Bernard [Jimenez] said, it basically carries forward the policy of directing growth to cities and unincorporated communities.**

County residents came away from that hearing with no clear statement from the Board as to whether the County was conducting a “Five-Year Review” of the existing 2000-2020 plan to extend the plan to 2040 or whether it was preparing a brand new plan to serve from 2020 to 2040.

Therefore, on October 13, 2017, pursuant to Sections 2312 and 2313 of Board of Supervisors Administrative Policy No. 29, the League formally asked for a public hearing to explain the nature of the “Five-Year Review and Revision of the General Plan.” The County ignored that request. (I should note here that the Board has never scheduled a public hearing to disclose whether the County is, in fact, conducting a plan review or preparing an plan update. Simply put, planning-wise and from a political perspective, the County has been completely silent on that subject.)

## 2023

Five years later and I'm still confused. In a last ditch effort to figure out exactly what's what, I studied the project descriptions included in the five documents listed below. My hope was that they would shed light on whether the County was still conducting a five-year review of the General Plan and whether it was updating it. I also hoped to find out whether the EIR was only analyzing revisions to the 2000 Policy Document or whether it was evaluating a brand new 2023 plan.

1. The March 21, 2018 Notice of Preparation (NOP) of the 2023 EIR
2. The January 15, 2021 Notice of Preparation (NOP) of the 2023 EIR (second notice)
3. The January 15, 2021 Notice of Completion & Environmental Document Transmittal Form
4. The April 28, 2023 Notice of the Availability of the Draft 2023 General Plan and Draft 2023 EIR
5. The 2023 Draft EIR itself.

I looked to see what each of these documents had to say about the nature of the project and EIR.

What I discovered were artful changes in text from year to year. While the 2018 NOP strongly suggested that the project was not a plan update, the 2021 NOP clearly stated that it was. And what of the documents from 2023? Well, they didn't help much, as they presented both viewpoints.

### 1. March 21, 2018 Notice of Preparation of the 2023 EIR

The citation below is from the County's March 21, 2018 Notice of Preparation of the EIR. It confirms what was relayed by planners at the October 13, 2015 Board hearing, namely, that the project is a review of the 2000 General Plan and that the EIR will evaluate only the revisions made to the existing plan.

#### **"Probable Environmental Effects and Scope of the EIR:**

The EIR for the **General Plan Review** and Zoning Ordinance Update will describe existing environmental resource areas and conditions in Fresno County. **The EIR is intended to be a program-level document that will analyze the broad environmental effects of the proposed General Plan revisions** and Zoning Ordinance Update, considering broad policy alternatives and program-wide mitigation measures. **The EIR will evaluate the potentially significant environmental impacts of implementing the proposed General Plan revisions** and Zoning Ordinance Update and will evaluate whether there are feasible mitigation measures that may lessen or avoid identified significant impacts."

[March 21, 2018 Notice of Preparation of the EIR, pages 3 and 4.]

## 2. January 15, 2021 Notice of Preparation of the 2023 EIR (second notice)

As you can see below, the 2021 NOP dropped the word “revisions” from the description of the scope of the EIR. It states clearly that the General Plan is being updated.

### “Probable Environmental Effects and Scope of the EIR:

The EIR for the review and update of the General Plan and a comprehensive update of the Zoning Ordinance will describe existing environmental resource areas and conditions in Fresno County. Pursuant to CEQA Guidelines Section 15125, existing conditions will be described as they exist when this NOP is circulated based on the most recent available data and information. The EIR is intended to be a program-level document that will analyze the broad environmental effects of the proposed General Plan ~~revisions~~ and Zoning Ordinance Update, considering broad policy alternatives and program-wide mitigation measures. The EIR will evaluate the potentially significant environmental impacts of implementing the proposed General Plan ~~revisions~~ and Zoning Ordinance Update and will evaluate whether there are feasible mitigation measures that may lessen or avoid identified significant impacts. No specific development projects are being considered. Rather, the analysis will focus on the reasonably foreseeable direct and indirect physical environmental effects compared to existing conditions that could result from adoption and implementation of the General Plan and Zoning Ordinance Update. Effectively, the EIR will analyze potential impacts from buildout of the General Plan on the existing environment. The EIR will also identify and evaluate alternatives to the proposed project.” [January 15, 2021 Notice of Preparation of the EIR, page 3.]

But even so, there is some contradiction in the 2021 NOP. As shown below, the Introduction to the 2021 NOP uses wording from the earlier 2018 NOP indicating that while the County is updating the Zoning Ordinance, it’s actually reviewing — not updating — the General Plan.

### “Introduction:

The County of Fresno (County) is reviewing its General Plan and updating its Zoning Ordinance. As Lead Agency under the California Environmental Quality Act (CEQA), the County has determined that the review and update may have a potential significant effect on the environment and that a Programmatic Environmental Impact Report (EIR) will be prepared to evaluate these potential effects.” [January 15, 2021 Notice of Preparation of the EIR, page 1.]

### 3. January 15, 2021 Notice of Completion & Environmental Document Transmittal Form

The transmittal form, which was submitted to the State Clearinghouse by the consulting firm preparing the 2023 Draft EIR, also made it clear that the General Plan is being updated. The transmittal form contains this paragraph.

**“The proposed project consists of a review and update of the County General Plan’s Background Report and Policy Document,** and a comprehensive update of the Zoning Ordinance. The revised General Plan is intended to build on the major policies of the current 2000 General Plan but expand and strengthen them to meet the challenges and community needs through planning horizon year 2040. The Zoning Ordinance would be updated for consistency with the General Plan.”

### 4. April 28, 2023 Notice of the Availability of the Draft 2023 General Plan and Draft 2023 EIR

On April 28, 2023, the County issued a Notice of Availability to inform the public that the Draft 2023 General Plan and Draft 2023 EIR were available for public review and comment. That document is a bit more problematic as it contains 14 statements that the General Plan is being “reviewed” but no statement that it’s being “updated.” By way of example, below are some citations from that document.

#### NOTICE OF AVAILABILITY

Draft Program Environmental Impact Report (DPEIR) for the  
Fresno County **General Plan Review** and Zoning Ordinance Update

Fresno County, California

April 28, 2023

**“PROJECT TITLE: Fresno County General Plan Review and Zoning Ordinance Update”**

**“The General Plan Review is intended to build on the major policies of the current 2000 General Plan** but expand and strengthen them to meet the challenges and community needs through planning horizon year 2042. The **General Plan Review** would accommodate County population growth projected through 2042.”

For me, the clause highlighted in red above creates an additional level of uncertainty. It reads, **“The General Plan Review is intended to build on the major policies of the current 2000 General Plan.”** The use of the word “*build*” suggests to me that the 2000 General Plan will continue to have agency in the future — that although policies in the 2000 General Plan are being revised, nonetheless, the 2000 General Plan remains the framework upon which revisions are made.

If the design and implementation of the 2000 General Plan Policy Document informs the revision taking place in 2023, then I would most definitely want to comment on the environmental effects of revising the text, policies and programs of the current plan — but I’ve been unsure if I can do that. I don’t know if the County will respond to comments about the effect of revising existing documents.

## 5. 2023 Draft EIR

The 2023 EIR doesn’t disentangle the situation. The 2023 Draft EIR opens with a statement that the primary objective of the GPR/ZOU (General Plan Review and Zoning Ordinance Update) is to bring plans into compliance with state law.

**“The primary objective of the GPR/ZOU are [sic] to ensure that the County’s guiding land use documents are consistent with State legislation** that has been enacted subsequent to the adoption of the County 2000 General Plan Update.”

[Draft EIR for the 2023 GPR/ZOU, pages ES-2 and 2-21.]

That’s all well and good, but to my way of thinking, such changes are relatively minor and do not rise to the level of a plan update — at least not on par with prior updates in 1976 and 2000. In fact, bringing the plan into consistency with state law was the reason given for initiating the five-year review in the first place — and at that time, the review was not considered a plan update.

That the General Plan Review and associated EIR focus primarily on bringing the 2000 General Plan into compliance with state law is evident from the large number of new policies, programs and mitigation measures recommended for adoption. Of the 58 programs proposed for addition to the Policy Document, over 80% address statutory requirements since 2000. Similarly, of the 175 policies proposed for addition to the Policy Document, over 85% address these same requirements. And of the 12 mitigation measures proposed for adoption, nearly all are related to changes in state law.

But if the primary focus of the project is compliance with state law, what of the hundreds of changes to policies and programs that have nothing or very little to do with changes in law? The County is proposing to delete or significantly modify 68% of the programs in the 2000 Policy Document. That also holds true for 29% of the policies. And then there are the 60 policies currently serving as environmental mitigation measures that will either be significantly modified or deleted. While I have not had an opportunity to see how many of these revisions are in response to statutory changes, I suspect they are few in number. And importantly, the County has not provided an explanation for these changes, and it appears the Draft 2023 EIR has not evaluated whether they have the potential to adversely affect the environment.

I'm not sure whether the EIR should evaluate changes proposed for the existing 2000 Policy Document, but based on wording in the draft 2023 EIR, I see that might be the case. As shown below, the Draft 2003 EIR claims that the Draft 2023 Policy Document is, in fact, the 2000 Policy Document, only revised. The Draft 2023 EIR also claims that it focuses on the revisions proposed for the current plan. If this is so, I would think that I can and should comment on the environmental effects of those revisions.

**“The revised General Plan Policy Document consists of the current 2000 General Plan Policy Document with proposed revisions** shown as red-color text. Proposed additions to the text are indicated by underline, and proposed deletions to the text are shown as strikethrough. As shown in the revised General Plan Policy Document, many of the proposed revisions are grammatical or formatting, and do not affect the substance or meaning [sic] the text. These types of revisions would not result in physical changes in the environment, and therefore are not the focus of analysis in this EIR. **The focus of this EIR is the revisions that would result in physical changes**, which could therefore also result in environmental impacts.”  
[Draft EIR for the 2023 GPR/ZOU, page 2-5; my underlining.]

One would think that wording in the Draft 2023 EIR, such as that above, would settle matters, but it doesn't.

On April 14, 2020, after publication of the 2018 NOP but before publication of the 2021 NOP, the Board of Supervisors approved consultant Agreement No. 20-144, which amended and restated Agreement No. 15-530 from 2015. As you will read below, the scope of work in the amended agreement called for a major change in the approach to the environmental review of the project — from a plan-to-plan analysis (an assessment of the environmental effect of revising the 2000 Policy Document) to an baseline analysis (as assessment of buildout under the Draft 2023 Plan compared to current environmental conditions).

## **“Phase 4 Environmental Review**

### **Task 4.1 Notice of Preparation (Revised)**

Under Amendment 2 [2020 AGT], the County has directed that the overall approach to the environmental analysis in the EIR will **change from a plan-to-plan comparison [2000 -2023] to an analysis that will focus on buildout of the proposed General Plan compared to existing conditions** (in other words, a baseline comparison). This will require recirculation of the NOP to change the existing baseline used for impact analysis.” [Page 5 of the Scope of Work under AGT 2020-144; my underlining]

As shown below, wording in the Draft 2023 EIR supports this change in focus.

**“The focus of this EIR is to:**

- Provide information about the GPR/ZOU for consideration by the Fresno County Board of Supervisors and Fresno County Planning Commission in their selection of the proposed project, an alternative to the proposed project, or a combination of various chapters from the proposed project and its alternatives, for approval
- **Review and evaluate the potentially significant environmental impacts that could occur as a result of the implementation of the GPR/ZOU [2023 General Plan Review and Zoning Ordinance Update] compared to existing conditions**  
[Page 1-20 of the Draft EIR for the 2023 GPR/ZOU; my underlining.]

In bringing this communication to a close, I’d like to provide an example of why a plan-to-plan comparison has value. For illustrative purposes, I turn your attention to the section in the General Plan that addresses noise — Section “G” (Section H in the Draft 2023 Policy Document) in the Health and Safety Element of the 2000 General Plan Policy Document.

I chose this section because it’s relatively short and slated for very little revision. Section “G” houses nine policies and two implementation programs. The Draft 2023 Policy Document retains each of these policies and programs as currently written. However, the Draft 2023 Plan does add one new policy, bringing the total number of policies to ten. All ten policies are shown in the chart on the next page. (The two implementation programs are discussed a bit later.)

[As an aside, the County gave the 10<sup>th</sup> policy the wrong ID number; instead of labeling it Policy HS-H.10, the County mistakenly labeled it Policy HS-H.12.]

With respect to the assessment of noise generation, the 2000 EIR and 2023 EIR differ greatly in their environmental conclusions. For example, the 2000 EIR identified an adverse noise impact that could not be mitigated to a level of insignificance, this despite the fact that the Board of Supervisors decided in 2000 that all nine policies in Section “G” should serve as environmental mitigation measures. And what is that impact? It’s the increase in noise that’s caused by cumulative development over the life of the plan.

Oddly, the Draft 2023 EIR came to a very different conclusion. It determined there will be no significant increase in noise under the revised plan. Contrary to the 2000 EIR, the Draft 2023 EIR claimed that unidentified (unnamed and undisclosed) goals and policies in the 2023 Draft Policy Document would minimize to a level of insignificance any future increase in noise level.



The 10 Policies in the “Noise” Section of the Two General Plan Policy Documents

In Which Plan?

ID No.		2000	2023
HS-G.1	The County shall require that all proposed development incorporate design elements necessary to minimize adverse noise impacts on surrounding land uses.	Yes	Yes (unchanged)
HS-G.2	The County shall require new roadway improvement projects to achieve and maintain the normally acceptable noise levels shown in Chart HS-1: “Land Use Compatibility for Community Noise Environments.”	Yes	Yes (unchanged)
HS-G.3	The County shall allow the development of new noise-sensitive land uses (which include, but are not limited to, residential neighborhoods, schools, and hospitals) only in areas where existing or projected noise levels are “acceptable” according to the Chart HS-1: “Land Use Compatibility for Community Noise Environments.” Noise mitigation measures may be required to reduce noise in outdoor activity areas and interior spaces to these levels.	Yes	Yes (unchanged)
HS-G.4	So that noise mitigation may be considered in the design of new projects, the County shall require an acoustical analysis as part of the environmental review process where:  a. Noise sensitive land uses are proposed in areas exposed to existing or projected noise levels that are “generally unacceptable” or higher according to the Chart HS-1: “Land Use Compatibility for Community Noise Environments;”  b. Proposed projects are likely to produce noise levels exceeding the levels shown in the County’s Noise Control Ordinance at existing or planned noise-sensitive uses.	Yes	Yes (unchanged)
HS-G.5	Where noise mitigation measures are required to achieve acceptable levels according to land use compatibility or the Noise Control Ordinance, the County shall place emphasis of such measures upon site planning and project design. These measures may include, but are not limited to, building orientation, setbacks, earthen berms, and building construction practices. The County shall consider the use of noise barriers, such as soundwalls, as a means of achieving the noise standards after other design-related noise mitigation measures have been evaluated or integrated into the project.	Yes	Yes (unchanged)
HS-G.6	The County shall regulate construction-related noise to reduce impacts on adjacent uses in accordance with the County’s Noise Control Ordinance.	Yes	Yes (unchanged)
HS-G.7	Where existing noise-sensitive uses may be exposed to increased noise levels due to roadway improvement projects, the County shall apply the following criteria to determine the significance of the impact:  a. Where existing noise levels are less than 60 dBLdn at outdoor activity areas of noise-sensitive uses, a 5 dBLdn increase in noise levels will be considered significant;  b. Where existing noise levels are between 60 and 65 dBLdn at outdoor activity areas of noise-sensitive uses, a 3 dBLdn increase in noise levels will be considered significant; and  c. Where existing noise levels are greater than 65 dBLdn at outdoor activity areas of noise-sensitive uses, a 1.5 dBLdn increase in noise levels will be considered significant.	Yes	Yes (unchanged)
HS-G.8	The County shall evaluate the compatibility of proposed projects with existing and future noise levels through a comparison to Chart HS-1, “Land Use Compatibility for Community Noise Environments.”	Yes	Yes (unchanged)
HS-G.9	The County shall not allow the development of new residential land uses in areas exposed to existing or projected levels of noise from aircraft operations at any airport or air base which exceed 60 dBLdn or CNEL.	Yes	Yes (unchanged)
HS-H.12 (Actually HS-H.10)	<u>The following measures to minimize exposure to construction vibration shall be included as standard conditions of approval for projects involving construction vibration within 50 feet of historic buildings or nearby sensitive receivers shall:</u>  <u>a. Avoid the use of vibratory rollers within 50 feet of historic buildings or residential buildings with plastered walls that are susceptible to damage from vibration and;</u>  <u>b. Schedule construction activities with the highest potential to produce vibration to hours with the least potential to affect nearby institutional, educational, and office uses that are identified as sensitive to daytime vibration by the Federal Transit Administration in Noise and Vibration Impact Assessment (FTA 2018)</u>	No	Yes (new)

The chart below contains text from both the 2000 EIR and the Draft 2023 EIR showing how both address the cumulative impact of noise generation. Although the two EIRs employed different terminology, the underlying concepts are the same. (The 2000 EIR speaks of “mobile” and “fixed” sources of noise; the Draft 2023 EIR speaks of noise from “traffic” and “stationary” sources.)

**Comparison of Environmental Conclusions in the 2000 EIR and the Draft 2023 EIR for a Similar Noise Impact**

2000 EIR	Draft 2023 EIR
<b>Impact</b>	<b>Impact</b>
<b>Impact 4.15-5.</b> The Draft General Plan, in combination with other cumulative <b>development</b> , would result in increases in <b>mobile and fixed noise source levels</b> , resulting in permanent increases in ambient noise levels that could affect sensitive receptors.	<b>Impact N-2. Development</b> envisioned in the GPR/ZOU would introduce <b>new stationary noise sources</b> associated with residential, commercial and industrial land uses and would contribute to an <b>increase in traffic</b> and railway noise. The continued regulation of stationary noise sources, consistent with the County’s Noise Control Ordinance, and implementation of goals and policies in the 2042 General Plan would minimize disturbance to adjacent land uses.
<b>Mitigation Measure(s)</b>	<b>Mitigation Measure(s)</b>
Policies HS-G.1 through HS-G.9.	None required.
<b>Level of Significance After Mitigation</b>	<b>Residual Impact</b>
Significant and Unavoidable	Less than Significant

Question: How is that the 2000 EIR concluded that even with the application of specific mitigation measures, cumulative development would result in a significant and unavoidable increase in noise while the Draft 2023 EIR concluded that without\* mitigation, cumulative development would result in no significant increase in noise?

\* Actually, the Draft 2023 EIR did reference mitigation — sort of. On page 4-12.38, under the heading “**Cumulative Impacts**,” the Draft 2023 EIR reported that although “*potential growth envisioned under GPR/ZOU may contribute to increased construction and operational noise*” and even though “*implementation of the GPR/ZOU would increase density and intensity of existing land uses*,” nonetheless, the “*goals and policies contained in the GPR/ZOU would address increased noise*” and, therefore, that “*cumulative noise impacts would be less than significant.*”

The Draft 2023 EIR should resolve the difference in the environmental conclusions in the two EIRs. It should also explain why mitigation measures adopted for the 2000 General Plan are not equally applicable in 2023.

On a related matter, it’s necessary to address environmentally the County’s failure under the 2000 General Plan to execute programs designed to implement adopted mitigation measures.

To that end, the draft 2023 EIR should examine the County's inability to fully implement a majority of its General Plan programs, a good example being Program HS-G.B, which required the County to develop a noise control program. Program HS-G.B is printed below.

**Program HS-G.B**

"The County shall develop an effective noise control program that includes:

- a. An ordinance (1) defining acceptable noise levels based on land use, (2) setting forth monitoring methodology and determination of violations, (3) defining exemptions and variance procedures, and (4) delineating enforcement and abatement procedures; and
- b. A public information program to inform county residents of the impact of noise on their lives."

According to information in the 2000 Policy Document, Program HS-G.B was to have been implemented by 2002, but the fact is that this program has never been implemented. The County's Annual Progress Report (APR) on the implementation of the General Plan for calendar year 2022 confirms this: "*A noise control program that addresses all components of this Implementation Program has not been developed.*" [APR for 2022, page 70.]

And why hasn't the program been developed? After all, program implementation is an "unequivocal directive" in the General Plan, which makes implementation mandatory.

It appears that part of the problem is the absence of a dedicated funding source. In its 2014 Annual Progress Report on the implementation of the General Plan, the County wrote:

**"Funding for Implementation Programs that have been Delayed**

In order to fully implement the County's General Plan Implementation Programs, an on-going dedicated funding stream is required. The various programs have not been fully implemented for a number of reasons, including the lack of available funding. Staff will continue to implement all outstanding Programs for which the Department is responsible as funding and staffing resources are available." [APR for 2014, page 16.]

Program HS-G.B was identified in the report as one of the programs delayed due to lack of funding.

The failure to implement General Plan programs is a serious matter. For the 2000 General Plan, full implementation of General Plan programs would have ensured the execution of hundreds of policies, many of which served as environmental mitigation measures. Making matters worse, over the

course of the past 23 years, the County has never once systematically monitored the implementation of any adopted mitigation measures, which is a violation of Public Resources Code 21081.6.

On April 1, 2019, the League of Women Voters of Fresno submitted to the County a report on the implementation of General Plan programs for calendar year 2017. The report, titled 2017 General Plan Annual Progress Report for the County of Fresno Prepared by the League of Women Voters of Fresno, detailed the County's inability to demonstrate successful implementation of programs in the 2000 General Plan. Below is a citation from that report.

“With an aim to improve transparency and accuracy, the League decided to prepare its own APR for 2017. The League found that the County's 2017 report of a 90% success rate for the implementation of General Plan programs was far from accurate. The rate of success was closer to 33%. More specifically, the League found, through very careful analyses, that the County's 2017 APR had demonstrated good implementation of 46 programs (33%), poor implementation of 44 programs (31%) and no implementation or failed implementation of 50 programs (36%).” [League APR for calendar year 2017, page 197.]

It's important to note that Program HS-G.B appears in the draft 2023 revision of the Policy Document. The program hasn't been implemented to date, so what guarantee is there that it will be implemented in the future? None, as I see it.

So, how big a problem is the failure to implement General Plan programs and mitigation measures? Well, to my way of thinking, if the Board approves a plan that has little chance of successfully being implemented, there will be some unhappy consequences.

- Plans on paper won't mirror with what's happening in the real world.
- Environmental findings will prove to be meaningless, and the environment will be poorly protected.
- General Plan goals will not be met, and the county will become less livable.
- Over time, there will be disappointment, finger-pointing and distrust all around.
- Funding will be diverted to solve problems that should never have arisen in the first place.

Well, as planner Will Kettler said back in 2015, it's certainly true that review of the General Plan has morphed over the past 18 years. My problem is that I don't quite know what it has morphed into — and this is impeding my understanding of how best to comment on the draft plan and EIR.

As you know, I attended three of the last five community workshops regarding the revision of the General Plan. That gave me an opportunity to speak with you and with other members of the County's planning staff. I'll close this communication by sharing with you my takeaways from those meetings.

- The revision of the Policy Document does not constitute a plan "update." The County is amending the existing 2000 General Plan through General Plan Amendment No. 529, which enables the planning horizon for the 2000 Policy Document to be extended from 2020 to 2042.
- "Self-mitigation" remains the primary strategy for ensuring that the General Plan is fully implemented and that General Plan goals are met.
- The administrative record for both the project and for the EIR has a start date of March 21, 2018, which the day the County published its first Notice of Preparation of the EIR for the General Plan Review and Zoning Ordinance Update. (I take exception to the use of that date. To my way of thinking, the start date for the administrative record for both the project and the EIR is the day the County filed General Plan Amendment Application No. 529.

Quite frankly, the confusion I've experienced over many years regarding the nature of both the project and the associated environmental review has driven me to distraction. I feel that the County is culpable for every misunderstanding and that problems in communication between the County and the public were completely unnecessary and avoidable.

The thank you for the opportunity to share my experience in this matter.

Sincerely,

Radley Reep

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2017 GENERAL PLAN  
ANNUAL PROGRESS REPORT

For  
The County of Fresno

Prepared by  
The League of Women Voters  
of Fresno

Presented to the  
Fresno County Planning Commission  
March 2019

## COMMENTARY by the LEAGUE OF WOMEN VOTERS OF FRESNO

March 30, 2019

State law requires that the Fresno County Planning Commission prepare an annual progress report (APR) on the implementation of the General Plan. In preparing that report, the Commission must adhere to guidelines adopted by the Office of Planning and Research (OPR), which support effective public participation and informed decision-making based on an accurate assessment of the degree to which the General Plan is being implemented in accordance with adopted goals, policies, programs and mitigation measures. Because the County's 2017 APR did not adhere to these guidelines or to directives in the General Plan itself, the League of Women Voters of Fresno (**League**) has drafted this 2017 APR as a way to demonstrate the critical need for complete and accurate reporting.

The County's General Plan was adopted October 3, 2000 with a new flagship Economic Development Element designed to end the county's chronic poverty and generate funding sufficient to protect the environment and provide adequate facilities and services for all county residents. But plan implementation did not go well. Fresno County remains one of the most impoverished areas in the nation, and a lack of available funding prevents the County from fully implementing the plan.

The County's first APR (2002), underscored the County's determination to implement the General Plan as written, even though a lack of funding had already caused some delays in plan implementation. According to a League study published September 1, 2016, although the 2002 APR reported good progress toward implementing 86 of 121 programs for the first six elements of the plan, by 2015, the County could only demonstrate successful implementation of 47 of those same programs.

For reasons unknown to the League, following preparation of that first APR, the County's enthusiasm for plan implementation waned. The County stopped preparing annual progress reports. But with the urging of the League and other community organizations, a decade later, in 2013, the County resumed the preparation of APRs. That said, unlike the County's 2002 APR, subsequent APRs were much less forthright in their appraisal of the County's ability to implement the plan. As a result, APRs from 2013 onward have not been of much value either to planners or the reviewing public.

In the summer of 2018, based on information provided by the County in its 2017 APR, the League recalculated the success rate for plan implementation. (For a list of program deliverables and the calculation of the success of implementation, please see Appendix E, pp. 187-197.) The League's assessment, which also evaluated implementation of the plan's Housing Element, found that the County was able to report successful implementation of only 33% of its General Plan programs. The League's finding contrasted sharply with the conclusion in the County's 2017 APR that 130 of 140 programs had been satisfactorily implemented —affording the County a 90% success rate.

What accounts for the discrepancy in the two calculations: 33% vs. 90%?

The League focused on the deliverable(s) for each program, thoroughly searching the County record for evidence to substantiate the degree to which each deliverable had been realized. As a result, the League's 2017 APR is a precise, accurate record of the County's ability to demonstrate successful implementation of the program portion of the General Plan.

In contrast, the County's 2017 APR generally sidestepped the assessment of program deliverables. In lieu of demonstrating successful plan implementation, the County's 2017 APR frequently included superfluous information that had little bearing on actual program objectives. As a result, the County's 2017 APR shrank from its principal objective, which was to accurately assess the degree to which the County had been able to implement its General Plan as written, and not as County staff might have wished it had been written.

The League took great care to make its version of the 2017 APR as complete and useful as possible. Even so, due to an inability to obtain all desired information, the League acknowledges that some areas are not as complete as wished. The League respectfully asks readers to report any errors in content.

The format of the League's 2017 APR mirrors that of the County's 2017 APR, the most significant differences being a more detailed explanation of program implementation and the inclusion of recommended amendments to the plan. Just as with the APR prepared by the County, the League has forwarded its 2017 APR to the Board of Supervisors, the Governor's Office of Planning and Research and the Department of Housing and Community Development.

Importantly, the County's General Plan is both a constitution for future development and a plan for addressing the economic and environmental hardships that have challenged Fresno County for some time. The plan embodies a set of goals that represent not the way Fresno County is but the way residents want it to be — a county with better paying jobs, equitable distribution of limited resources, sustainable agriculture, cleaner air and water, and much more. The Plan is comprehensive and specific — and county residents have entrusted its implementation to County personnel.

The League sincerely hopes its 2017 APR will motivate the County to improve future reporting.

Sincerely,



Marianne Kast, President  
League of Women Voters of Fresno



## COMPLETENESS OF THE COUNTY'S 2017 APR

The 2017 APR approved by the Board of Supervisors on May 8, 2018 was not prepared in complete accordance with Government Code Section 65400, nor was it prepared in complete accordance with requirements specified in the County's own General Plan Policy Document. (The County's 2017 APR contained quantities of information that were not directly applicable to or dispositive of the General Plan matters under review.)

Missing was information required by Government Code Section 65400, including...

- The “*progress*” made in implementing the General Plan.
- The degree to which the General Plan complied with the General Plan Guidelines published by the Governor's Office of Planning and Research (OPR).

Missing was information required by the General Plan itself, including...

- Information that satisfied the statutory requirements for a mitigation monitoring program.
- Results of the County's Groundwater Monitoring Program.

Also missing from the report was acknowledgement of a major breakdown in plan implementation, the fact that the County had been unable to implement (as prescribed) the majority of the plan's 140 programs.

In addition, the County's 2017 APR did not report on whether the County was achieving General Plan goals. Significantly, at a February 22, 2018 meeting with County planning staff, League members were informed that while the County's APRs would continue to report the “*status*” of the plan's many implementation programs, it would not assess the degree to which General Plan goals were being met. (For a list of the 52 goals of the General Plan, please see Appendix C, pp. 182-184.)

In point of fact, the County's 2017 APR did not contain a single comment on progress toward reaching any of the goals of the plan, nor did it discuss whether adopted General Plan mitigation measures were successfully protecting the environment.

Furthermore, the County's 2017 APR did not provide information sufficient to identify necessary course corrections for the General Plan or identify ways to improve its implementation. In short, the County's 2017 APR was far from complete, offering very little in the way of useful information for review by the Board of Supervisors and the public.

## ACCURACY OF THE FRESNO COUNTY 2017 ANNUAL PROGRESS REPORT

In adopting its 2017 Annual Progress Report, the Board of Supervisors did not heed the well-known admonition to report “*the truth, the whole truth and nothing but the truth.*” For example,

- (A) The report regarding the planning horizon for the General Plan was not the truth;
- (B) The report of the ongoing review of the General Plan was not the whole truth; and
- (C) The report of the status of General Plan programs was anything but the truth.

### (A) Planning Horizon for the 2000 General Plan

The County’s 2017 APR misreported the planning horizon for the General Plan, incorrectly stating that the plan horizon extended to the year 2025. In truth, the planning horizon is to the year 2020. This is known from statements in the General Plan itself and from statements in the accompanying 2000 EIR.

“The timeframe for the updated General Plan will be the year 2020.” (EIR, p. 2-22)

“...the Policy Document has a planning horizon of 20 years...” (2003 Housing Elem, p. 7-10)

“During the life of the General Plan, which extends to 2020,...” (EIR, p. 4.15-9)

Although 2020 is the horizon year, four years ago, in a December 9, 2014 report to the Board of Supervisors, County planning staff stated that “the current General Plan was updated in 2000 with an estimated 25-year planning horizon. As a result, the next anticipated update should commence sometime within the next 10 years (the last General Plan Update took approximately four to five years to complete).” In other words, County staff misreported to the Board of Supervisors that the planning horizon for the General Plan was five years beyond the actual date, which may have caused the Board to think that an update of the plan was five to ten years into the future and not of immediate concern.<sup>1</sup>

Alarmed that the County was attempting to defer by five years its responsibility to timely update the General Plan, League members carefully read through the 2000 General Plan Policy Document and accompanying EIR. The year “2020” appeared in those documents nearly 300 times. The year “2025” did not appear once.

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<sup>1</sup> Had the County acknowledged at its December 9, 2014 Board meeting that the planning horizon for the General Plan was the year 2020, then given the fact that “the last General Plan Update took approximately four to five years to complete,” the County would have been expected to initiate a General Plan update in either 2015 or 2016.

On October 17, 2017, the League — along with other organizations — appeared before the Board of Supervisors and requested a public hearing to, among other things, set the record straight regarding the plan’s horizon date, but rather than hold a public hearing, the County sent the League a letter dated November 14, 2017 stating that the planning horizon did, indeed, extend beyond the year 2020.

“Pursuant to the Fresno County General Plan Vision Statement, the planning horizon for the General Plan is for the period 2000 to 2020 and beyond.” (Underlining is added.)

The County’s response was disappointing, for while the vision of the General Plan does extend far into the future, its planning horizon does not. It extends to a specific year – the year 2020.

On February 22, 2018, League members met with County Planning staff to discuss what the League saw as inaccuracies in a first draft of the County’s 2017 APR, including a misstatement regarding the planning horizon for the General Plan. At that time, the County’s draft 2017 APR read as follows:

“Fresno County’s General Plan has a planning horizon of 15 to 25 years.”

The League asked the County Planning Department to acknowledge in its 2017 APR that the planning horizon for the General plan was, in fact, the year 2020. Staff agreed to make the necessary correction to the draft APR; however, when a revised draft APR was presented to the Board of Supervisors, the League discovered two erroneous sentences where there had been one before. The County left the original sentence in place and added a second erroneous statement.

“Fresno County’s General Plan has a planning horizon of 15 to 25 years. The planning horizon for the 2000 General Plan is through the year 2020 and beyond.” (Underlining is added.)

On the day the Board of Supervisors approved the County’s 2017 APR, League members asked the Board to correct the inaccuracy, but the League’s request went unanswered. Hopefully, the County’s next APR — for 2018 — will correctly identify the General Plan horizon as the year 2020.

#### **(B) Ongoing Review of the General Plan**

The County’s 2017 APR contained a very brief history of the County’s lengthy process for reviewing the General Plan. That account is reprinted below.

“In June 2006, the Board of Supervisors directed staff to initiate a Review of the General Plan Policy document along with the comprehensive update of the Zoning Ordinance. The purpose of the General Plan Review was to evaluate goals, policies and implementation programs of all the General Plan elements to reflect the current conditions, reflect Board priorities, delete policies and programs that have served their purpose or are obsolete, and add policies and programs to address new laws that affect the General Plan since its adoption in 2000.”

While the information was accurate, it was not the whole truth. Below is what the County's 2017 APR did not report.

General Plan Program LU-H.E and General Plan Policy LU-H.14 require the County to “conduct a major review of the General Plan, including General Plan Policy Document and Background Report, every five years<sup>2</sup> and revise it as deemed necessary.”

In compliance with the requirements of Program LU-H.E, on November 8, 2005, the Board of Supervisors authorized \$600,000 for the review of the General Plan Background Report and Policy Document. The project was made a bit more complex with the decision to simultaneously update the Fresno County Zoning Ordinance. (These two tasks were packaged together and given the project title: *Five-Year Review and Revision of the General Plan and Comprehensive Review, Revision and Amendment of the Zoning Ordinance*.) But what began as a five-year review in 2005, over the length of a decade, morphed into a comprehensive *update* of the plan. That transformation occurred in two stages.

### **1. Downscale of the Five-Year Review begun in 2005**

In July 2007, the Board of Supervisors expended \$100,000 of the \$600,000 allocated for the General Plan Review and Zoning Ordinance Update to complete an update of the Laton Community Plan. That same month, on July 22, the Board reduced the remaining \$500,000 to \$380,000, directing staff to concentrate on the update of the Zoning Ordinance and to “reduce funding and emphasis primarily for the General Plan Review, especially in areas of Policy Update and public review.” As part of the economizing, the County eliminated the five-year review of the General Plan Background Report.

Seven years later, on September 30, 2014, County staff recommended that the Board of Supervisors approve the scaled-down project: the revision of the General Plan Policy Document only. (The update of the Zoning Ordinance and Background Report would wait.) County staff also recommended that the Board adopt a Negative Declaration<sup>3</sup> for the abridged project. But the Board decided otherwise, directing staff to prepare an environmental impact report (EIR). (For reference, the unavoidable adverse impacts stemming from the adoption of the current 2000 General Plan are listed in Appendix D, pp. 185-186.)

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<sup>2</sup> The first five-year review should have been completed in 2005 or 2006, and the County should have completed similar reviews every five years thereafter – in 2010 and 2015, but none of these reviews were realized. Instead, the review begun in 2005 is ongoing and in its 14<sup>th</sup> year.

<sup>3</sup> The adoption of a Negative Declaration would have constituted a legal finding on the part of the County that an EIR was not needed and that the approval of a revised General Plan Policy Document would not have resulted in adverse impacts to the environment.

## 2. Reincorporation of the Zoning Ordinance and General Plan Background Report into the Project and Transformation of the Five-Year Review into a Comprehensive Plan Update

On December 9, 2014, minus an initial study demonstrating the need for an EIR, the Board of Supervisors allocated \$850,000 for the preparation of an EIR to analyze the environmental impact of approving both the five-year review of the General Plan and the update of the Zoning Ordinance. And although the Board did not reauthorize the review of the General Plan Background Report at that time, a year later, on October 13, 2015, the Board approved a scope of work that included, as well, the update of that report.

It is important to note that 18 months earlier, on July 26, 2012, County staff made it clear to the Planning Commission that the review of the General Plan was not a plan update but was, instead, a limited scope review of the 2000 General Plan.

“Staff would like to emphasize that the Five-Year Review that was undertaken in 2006 is not a comprehensive update of the County General Plan, similar to the year 2000 update. This is a limited scope project....” (Underlining is added.)

However, three years later, on October 13, 2015, the County included in the consultant agreement for the preparation of the EIR a direction to extend the planning horizon to the year 2040.<sup>4</sup> With that direction to extend the planning horizon to 2040, the County effectively initiated the transformation of the five-year review into a General Plan update.

Not only did the County’s 2017 APR fail to report the direction to extend the planning horizon to 2040, it also did not report that beginning in the summer of 2016 and continuing into January 2018, the County removed from its website all mention that the County was in the process of revising the General Plan, which meant that for 18 months, including all of 2017, there was no information available to the public regarding the County process for updating the plan. Concerned that the County was quietly turning a 5-year review of the General Plan into a comprehensive 20-year update, county residents raised the issue at a May 16, 2017 Board hearing for Item #15 — *General Plan Review and Zoning Ordinance Update Status Report*. At that hearing, County Counsel suggested that the Board of Supervisors clarify whether the County was conducting a five-year review or a plan update.

**Counsel:** “...as to whether it is a review or an update. I think that this Board needs to define with staff at this stage...That was asked but I don’t think we got the answer just yet as to exactly where the Board wants to go with that review versus update because that can change legal opinions...that our office gives in terms of some of the things that might, you know, need to be included....”

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<sup>4</sup> The agreement read in part: “The Consultants will revise the...General Plan Policy Document... to reflect a revised planning horizon (e.g., 2040).” That direction is found on page 25 of the agreement. It is important to note that the October 13, 2015 staff report to the Board made no mention that the planning horizon was being revised.

The Board of Supervisors did not heed County Counsel’s advice, and to this day, the Board has never declared whether the County is conducting a 5-year review or a 20-year update of the General Plan.

That said, there were indications from other sources that enabled a few members of the public to piece together the fact that the County was, indeed, updating the General Plan. Below are four such clues.

1. In response to a 2016 planning survey conducted by the Governor’s Office of Planning and Research, the County reported it planned to complete an update of its General Plan in 2018.
2. The County’s draft December 2017 Background Report contained this statement: “The horizon year for Fresno County’s General Plan Update is 2040...”
3. In the County’s 2016-17 and 2017-18 annual budgets, on pages 189 and 203, respectively, there were statements that the County’s Department of Public Works and Planning would “continue to be involved in the...comprehensive review and update of the County’s General Plan....”
4. And the County’s 2016 Comprehensive Economic Development Strategy reported on page 63 as follows: “The 2000 General Plan Economic Development Element describes the County’s goals and policies, which are in the process of being updated but not yet available for public review...The General Plan is being updated with a new Economic Development Element that is not yet ready to be incorporated into the CEDS report.” (Underlining is added.)

It is disappointing that the County chose not to include in its 2017 APR information that during 2017 (at the time information about the review of the General Plan was removed from the County website) the County worked to transform a decade-long five-year review of the General Plan into a plan update to the year 2040 without informing residents it was doing so and without giving residents an opportunity to provide input regarding planning challenges and community needs for the next twenty years — from 2020 to 2040.

### **(C) Implementation of General Plan Programs**

The County’s 2017 APR is awash with information that does not address the degree to which the County was able to successfully implement General Plan programs during 2017. In this respect, the APR is misleading. A good illustration of this is the County’s report on the very first program in the General Plan. Program ED-A.A required the County to create a staff position to facilitate implementation of the County’s Economic Development Strategy. Program ED-A.A reads as follows:

“The County shall create an economic development staff position(s) in the County Administrative Office and the Planning & Resource Management Department to serve as liaison/facilitator and support for the economic development implementation program and the Action Team.”

In 2017, that staff position did not exist, and the County’s 2017 APR should have reported that fact. Instead, the APR reported in full as follows:

“As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised. With respect to this Program, a new policy and program are proposed for development of an Economic Development Action Team consisting of members of the Board of Supervisors, County staff and city representatives.”

The County’s 2017 APR did not address the purpose of Program ED-A.A — the creation of an economic development staff position. Instead, the APR focused on the creation of an Economic Development Action Team (EDAT) — and even that information was inaccurate. The obligation to create an EDAT already existed in the General Plan as a separate requirement under a different program — Program ED-A.B. Importantly, the County’s APR did not report that on September 12, 2017, the Board of Supervisors created an action team, albeit in violation of specifications outlined in General Plan Policy ED-A.3, which required the County to include as members of that team the County’s Agricultural Commissioner and regional organizations engaged in various facets of economic development in the county.

Because this type of misreporting was widespread in the County’s 2017 APR, the League decided to draft its own APR for 2017 — one that would be more informative.<sup>5</sup> For comparative purposes, shown below in blue is the League’s 2017 assessment of the implementation of Program ED-A.A. (See pages 26 and 27 of the League’s APR for a complete report on the implementation of this program.)

Reprint from the League’s 2017 APR — Implementation of Program ED-A.A

“The County does not currently have a liaison/facilitator staff position, but it did some years ago. According to the County’s first APR (dated May 2003), on April 23, 2002, the Board of Supervisors ‘*created the position of Assistant County Administrative Officer for Economic Development.*’ A few years later, the Board of Supervisors reversed itself and eliminated the position.

The County’s 2015 and 2016 APRs stated that in 2011 the County entered into a contractual arrangement with the Economic Development Corporation (EDC) ‘*for implementation of the Economic Development Element programs.*’ (That contract is renewed annually.)

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<sup>5</sup> For the sake of clarity, the League incorporated into its 2017 APR information from each of the County’s five APRs (for 2002, 2013/2014, 2015, 2016 and 2017). The League’s 2017 APR is contained in Appendices A and B of this document. Its full report on the implementation of Program ED-A.A is found on pages 26 and 27.

The County's 2017 APR stated that a '*new policy and program*' were being proposed for an Economic Development Action Team. (That proposal was not directly applicable to the program under review. It was, however, applicable to Program ED-A.B.)

On March 28, 2017, the Board of Supervisors directed County staff to evaluate the possibility of reestablishing the position of economic development liaison/facilitator. (The County's 2017 APR provided no evidence that staff followed through on that directive.)

The County has proposed (through its December 2017 draft of the Policy Document) to amend Program ED-A.A to read that the County will allocate resources toward economic development rather than establish a staff position to serve as liaison/facilitator and support for the County's economic development programs and Economic Development Action Team.

**Conclusion:** Currently, as required by Program ED-A.A, the County does not have a staff position to serve as liaison/facilitator and support for the County's economic development programs and Economic Development Action Team.

**Evidence of the successful implementation of Program ED-A.A during 2017: None."**

Hopefully, the County's next APR — for calendar year 2018 — will focus directly on program implementation. The County should include all relevant information in its APR — even if that information shows implementation of the plan in less than favorable light. Otherwise, the purpose of the APR will not be realized. According to the Governor's Office of Planning and Research, the APR should "provide enough information to allow local legislative bodies to assess how the general plan is being implemented" and "to identify necessary course adjustments or modifications to the general plan as means to improve local implementation." (General Plan Guidelines, 2017, p. 259).

#### THE NEED TO ASSESS PROGRESS TOWARD ACHIEVING GENERAL PLAN GOALS

The County does not use annual progress reports (APRs) to assess the achievement of General Plan goals. It is the County's position that such analysis is not required because it is not mandated by statute or by the General Plan itself. It's important to note, however, that this limitation is self-imposed. State law does not preclude the County from including an analysis of the achievement of General Plan goals — and neither does General Plan Program LU-H.D (the General Plan program that codifies the statutory mandate to prepare annual progress reports).

For the reasons presented below, the League has come to the conclusion that the County's APRs must assess progress toward achieving General Plan goals. This conclusion is based on a review of state law, the structure and content of the General Plan, as well as the positions taken by the Planning Commission and Board of Supervisors following adoption of the plan in 2000.



California Government Code 65400 stipulates that once an agency has adopted a general plan, it must provide to the state an annual report on progress made toward implementing that plan. Admittedly, the statute does not specifically state that an APR must assess progress toward achieving general plan goals. Below is the relevant portion of that code.

#### California Government Code 65400

(a) After the legislative body has adopted all or part of a general plan, the planning agency shall do...the following:

(2) Provide by April 1 of each year an annual report to the legislative body, the Office of Planning and Research, and the Department of Housing and Community Development that includes all of the following:

(A) The status of the plan and progress in its implementation. (Underlining is added.)

Closer to home, General Plan Program LU-H.D states that in preparing APRs the County will focus principally on actions taken to implement General Plan programs. The inclusion of the word “*principally*” leaves room for the County to consider other aspects of the implementation of the General Plan, including the degree to which policies are being executed and the extent to which goals are being met. The opening sentence of Program LU-H.D reads as follows.

#### Program LU-H.D

“The Planning Commission shall review the General Plan annually, focusing principally on actions undertaken in the previous year to carry out the implementation programs of the plan.” (Underlining is added.)

Although the County’s first APR (2002) focused primarily on the County’s efforts to implement General Plan programs, the APR also stated that through the use of an “indicators” program subsequent APRs would assess the achievement of General Plan goals.<sup>6</sup> On the following page are citations from pages III-1 and V-1 of the 2002 APR, which state clearly the county’s strategy for monitoring the achievement of General Plan goals.

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<sup>6</sup> In 2010, as part of the first proposed draft of the five-year revision of the General Plan Policy Document, the County recommended adding new Program LU-H.C for an indicators program; however, with the release of the sixth draft in December 2017, that program was lined out. Below is a copy of what the County had proposed.

Proposed Program LU-H.C from the August 2010 Draft Revision of the General Plan — now lined out.

*The County shall develop an Indicators Program that monitors the success of the County in achieving the goals of the General Plan. The County shall conduct an annual review of the Indicators Program and report the findings to the Planning Commission and Board of Supervisors. (Underlining is added.)*

“Progress toward attainment of the General Plan goals can be measured in various ways including formal actions on applications, completion of implementation programs, and through ‘indicators.’ Indicators can serve as a tool with which to evaluate or assess progress toward attainment of the goals of the General Plan. Indicators can suggest that the desired progress is occurring or being made, or they may indicate that additional or more definitive action is needed to bolster, accelerate or redirect an activity to show the desired results...It is intended that the set of indicators will be keyed to the vision statement and the major themes for purposes of assessing overall progress toward attainment of the individual goals of the various elements of the general plan....

The County is making progress in the implementation of the General Plan as adopted in October 2000....Although it is too early to draw conclusions from the indicators provided in Section III, it is expected that over a period of time the indicators can be used to determine the effectiveness of implementation and/or identify the need to amend the General Plan or bolster programs to achieve the goals of the plan. It is also anticipated that additional indicators for other themes of the General Plan will be developed for future annual reports.”

(Underlining is added.)

As demonstrated above, although state law and General Plan Program LU-H.D do not specifically mention the need to assess progress toward achieving General Plan goals, the County’s 2002 APR clearly stated that subsequent APRs would assess progress toward achieving plan goals through the use of an indicators program. On August 26, 2003, the Board of Supervisors affirmed the need to assess General Plan goals by directing staff to develop an indicators program “for use on a regular basis.”

But that is where the focus on General Plan goals ended. The County did not prepare an APR for 2003, nor did it prepare any APRs for the next ten years. When the preparation of APRs was resumed in 2013, the APRs made no mention of an indicators program, nor did they assess whether the County was achieving General Plan goals.

Of note, despite the County’s choice not to evaluate the achievement of General Plan goals, two General Plan programs (printed below) require the County to do just that — the first being the five-year evaluation of economic goals and the second an annual assessment of agricultural goals. The County’s APRs have not provided evidence sufficient to show that these two programs are being implemented.

Program ED-A.C

“The County shall retain an independent and qualified institution to conduct an evaluation at least every five (5) years of success in achieving the goals and targets of the Economic Development Strategy.” (Underlining is added.)

Program LU-A.D

“The County shall periodically review agricultural land preservation programs and assess their effectiveness in furthering the County's agricultural goals and policies.” (Underlining is added.)

In a related matter, it's important to note that certain sections of the General Plan Policy Document are not supported by implementation programs. It stands to reason, therefore, that because the County limits its plan review to program implementation, some portions of the General Plan escape evaluation.

Listed below are the six sections of the 2000 Policy Document — each with its own General Plan goal — that are not supported by specific implementation programs.

- |   |                        |
|---|------------------------|
| ED-E Non-Agricultural Rural Development | PF-J Utilities         |
| TR-C Transportation Systems Management  | OS-C Mineral Resources |
| TR-F Air Transportation                 | OS-K Scenic Resources  |

According to the December 2017 draft revision of the General Plan, the County proposes to eliminate existing implementation programs for seven additional sections.

- |  |                                |
|--|--------------------------------|
| LU-D Westside Freeway Corridor                   | OS-E Fish and Wildlife Habitat |
| PF-A General Public Facilities and Services      | OS-I Recreational Trails       |
| PF-B Funding (of public facilities and services) | PF-G Law Enforcement           |
|  | HS-B Fire Hazards              |

Should the Board of Supervisors adopt the draft December 2017 revision of the Policy Document as drafted, future APRs may fail to assess 25% of the General Plan Policy Document in that 13 of the 52 sections of the plan would not be supported by implementation programs.

The County's 2018 APR must assess progress toward implementing every section of the General Plan Policy Document. It must evaluate, as well, the County's ability to achieve the goals of the plan.

## CONCLUSION

Developed in the late 1990s with input from a broad range of community interests, the Fresno County 2000 General Plan was cutting edge for its time — a blueprint for future development that promised to end the county's chronic poverty, protect the environment and provide adequate facilities and services for all county residents. But the plan was only as good as the County's ability to implement it. Today we realize that the County has had considerable difficulty implementing the plan as written and that the County's annual progress reports misrepresent that fact.

It is with a sincere interest in the future well-being of the county and its residents that the League of Women Voters of Fresno presents this 2017 APR to the Fresno County Planning Commission. Hopefully, this APR will serve as a catalyst for improving the County's annual reporting. Enhanced reporting will provide the information needed to improve plan implementation, and it will help ensure that General Plan goals are achieved.

# 2017 GENERAL PLAN ANNUAL PROGRESS REPORT

(For Fresno County)

Prepared by  
The League of Women Voters of Fresno



March 2019

Presented to  
The Fresno County Planning Commission

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## PURPOSE OF THE ANNUAL PROGRESS REPORT

Government Code Section 65400 mandates that every county prepare an annual report on the implementation of its general plan and submit it to its legislative body, to the Governor's Office of Planning and Research (**OPR**) and to the Department of Housing and Community Development (**HCD**) by April 1 of each year.

The purpose of the APR is to provide enough information for decision makers to assess how well the general plan was implemented during the previous 12 months. More specifically, the APR explains how land use decisions relate to adopted goals, policies, and implementation programs. The APR should provide enough information to enable the legislative body (Board of Supervisors) to identify necessary course adjustments or modifications to the plan to improve its implementation.

## FORM AND CONTENT – STATE GUIDELINES AND REQUIREMENTS

OPR has prepared General Plan Guidelines to assist in the preparation of an annual progress report. These guidelines allow maximum flexibility in the form and content of the report. The report need not incorporate all of the components recommended by OPR, and it need not be an elaborate and time-consuming task. The APR may make use of existing documents that contain information pertinent to general plan reporting, such as performance reports and budget reports, as long as they specifically address plan implementation. This approach to reporting enables general plan implementation to be discussed in the broader context of a jurisdiction's overall programs and activities, including economic development and other matters of local concern.

While each county must determine for itself the information that is most important to include in its APR, OPR nonetheless recommends that an APR contain the following components:

1. An introduction.
2. A table of contents.
3. The date the APR was accepted by the local legislative body.
4. Specific implementation measures associated with individual elements of the general plan.
5. Housing element reporting as required by Government Code Sections 65583 - 65584 and HCD's housing element guidelines. \*
6. The degree to which the general plan complies with OPR's General Plan Guidelines. \*
7. The date of the last update to the general plan. \*
8. Priorities for land use decision-making as established by the local legislative body.
9. Goals, policies, objectives or standards that were added, deleted or amended.
10. Lists of the following activities with brief comments on how each advanced the implementation of the general plan:
  - a) Planning initiated (e.g., master plans, specific plans, master environmental assessments).
  - b) General plan amendments.
  - c) Major development applications.

\* These components are mandated by Government Code Section 65400 (2).

Most importantly, as directed by the State Legislature, the APR must address the status of the General Plan and progress toward its implementation.

Although the word “*status*” is not defined in the statute, the term most certainly refers to the degree to which a general plan remains an effective planning tool, given that laws, environmental conditions and social mores change over time. And although the term “*progress*” is also undefined in the Government Code, the word unquestionably refers to the degree to which a jurisdiction has been able to successfully implement general plan programs and policies and to make progress toward achieving the goals of the plan.

The OPR guidelines note that if a jurisdiction has the resources, it may want to make its APR a more comprehensive tool for undertaking planning and development activities. As recommended by OPR, a jurisdiction can do this by incorporating the following components into its APR:

1. Reviewing and reporting on...
  - a) Interagency or intergovernmental coordination efforts and partnerships.
  - b) The implementation of mitigation measures from the general plan final EIR.
  - c) Equity planning and impacts on particular ethnic or socioeconomic population groups.
2. Summarizing efforts to...
  - a) Promote infill development and redevelopment in underserved locales.
  - b) Protect environmental and agricultural resources, as well as other natural resources.
  - c) Encourage efficient development patterns.
3. Describing strategies for...
  - a) Economic development (e.g., approaches to job creation and tax revenue enhancement).
  - b) Monitoring growth (e.g., data on land use development, services and infrastructure).
4. Other actions:
  - a) Outline department goals, activities and responsibilities related to land use planning.
  - b) Perform a regional assessment of population changes, housing needs, job generation, etc.
  - c) Summarize comments on general plan implementation.
  - d) Identify and monitor methods to encourage public involvement in planning activities.
  - e) Review and summarize the administration of grant funding for land use planning activities.
  - f) Provide technological reviews, such as those for websites and geographic information systems).

## **FORM AND CONTENT – FRESNO COUNTY REQUIREMENTS**

The Fresno County General Plan Policy Document also prescribes the contents of an APR. According to the General Plan, at a minimum, every Fresno County APR must include...

- A review of the actions undertaken to implement General Plan programs.
- Information that satisfies the statutory requirements for a mitigation monitoring program.
- Information from the County’s Groundwater Monitoring Program.
- An inventory of lot size exceptions granted for agricultural lands and rangelands.
- Information on the County’s Road Improvement Program.

## OVERVIEW OF THE 2000 GENERAL PLAN

The 2000 General Plan was adopted October 3, 2000. It has a planning horizon of 20 years.

There are three components to the General Plan. The most familiar of these components is the Policy Document, which, for Fresno County, consists of the following seven elements:

- Economic Development Element
- Open Space and Conservation Element
- Agriculture and Land Use Element
- Health and Safety Element
- Transportation and Circulation Element
- Housing Element
- Public Facilities and Services Element

These seven elements contain a total of 52 goals. Examples of such goals include enhanced farmland preservation, job creation, wetlands protection and affordable housing. (The goals of the General Plan are listed in Appendix C, pp. 182-184.)

To achieve these goals, the plan includes a large number of policies. To help execute these policies, the plan contains a set of implementation programs. At present, the General Plan Policy Document contains 639 policies and 140 implementation programs. Almost half of the policies are environmental mitigation measures. (Appendix D, pp. 185 – 186, lists the General Plan policies that serve as environmental mitigation measures.) The entire set of programs and the vast majority of the policies constitute an obligatory work plan. Nearly every policy and program contains the word *shall*, which is defined in the General Plan as an “*unequivocal directive*.”

The second component of the General Plan is a 778-page Background Report, which describes the physical features, economic characteristics and social conditions that were in existence just prior to the adoption of the plan in 2000.

And the third component is a collection of over 40 land use plans that are applicable to certain areas of the county, three examples being the Kings River Regional Plan, the Easton Unincorporated Community Plan and the Quail Lake Estates Specific Plan.

What sets the 2000 General Plan apart from its predecessor (the County's 1976 General Plan) is the inclusion of a new Economic Development Element. This new element, which grew out of an Economic Development Strategy developed in 1999, is the mainspring of the plan.

While the General Plan Policy Document itself does not contain a vision statement, the accompanying Economic Development Strategy most certainly does. That vision, paraphrased below, expresses the principal mission of the 2000 General Plan.

*By 2020, Fresno County shall become a center for a wide variety of high value-added agricultural farming operations. This, along with job growth in emerging industrial clusters, will provide Fresno County residents with greater employment opportunities. A higher rate of employment in better paying jobs will increase consumer spending and decrease the cost of services for the unemployed. The resultant increase in revenues for the public sector and the mitigation of negative impacts associated with economic growth will result in an impressive quality of life for all county residents.*

The General Plan embraces these eleven themes:

- Agricultural Land Protection
- Economic Development
- Enhanced Quality of Life
- Resource Protection
- Service Efficiency
- Efficient and Functional Land Use Patterns
- Growth Accommodation
- Affordable Housing
- Health and Safety Protection
- Urban-Centered Growth
- Recreational Development



## A LOOK AT THE 2000 ECONOMIC DEVELOPMENT ELEMENT

The Economic Development Element, which was added to the General Plan in 2000, took four years to create.

In late 1996, the Board of Supervisors initiated a comprehensive update of the General Plan. The first step in that process was the May 1997 Board acceptance of a draft *General Plan Background Report*, which described physical characteristics and social and economic conditions in the county. Two months later, the Board released the results of a survey conducted by U.C. Davis entitled *Fresno County and the Future: Residents' Views of Growth, Resources and Jobs*. The survey reported that the top issues for Fresno County residents were job creation and economic development. That 1997 survey was followed in 1998 by a County report entitled *Economic & Growth Scenarios: Perspectives on the Year 2020*. Based on that report, the Board directed that the update of the General Plan should promote (1) a shift in agricultural production to higher value crops, (2) an increase in value-added agricultural industries and (3) the diversification of the economy to create more non-agricultural jobs.

In 1998, the County published a technical report entitled *Fiscal and Financial Analysis*, which examined the costs and benefits associated with development under the existing 1976 General Plan and under the proposed update of the plan.

Fresno County stipulated in its RFP (request for proposals) for the update of the General Plan that the consultant team begin the update process by preparing a *General Plan Economic Development Strategy* to guide the revision of the General Plan. The adopted Strategy envisioned that by the year 2020 Fresno County would be a center for a wide variety of high value-added agricultural firms in a dynamic and globally-oriented economy with average incomes in line with other regions of the state.

This Economic Development Strategy was the prototype for the County's new 2000 *Economic Development Element*. In fact, nearly every policy in the Economic Development Element was taken directly from the County's Economic Development Strategy. In like manner, the three goals of the Economic Development Element mirrored those in the Strategy document: (1) increased job creation, (2) diversification of the county's economic base, and (3) improved labor force preparedness. Not surprisingly, the accompanying 2000 EIR focused on changes to the environment that were likely to result from the implementation of the County's new Economic Development Strategy.

The coordination of countywide economic development was to be the responsibility of an Economic Development Action Team composed of County departments and regional organizations engaged in various facets of economic development within the county. However, on April 23, 2002, and in conflict with directives in General Plan Policy ED-A.3, the Board appointed itself as the action team to oversee economic development. That decision was flawed, especially since subsequent Boards did not function as an economic development action team.

Over time the Board's enthusiasm for supervising economic development began to wane. According to the County's APRs for calendar years 2013 through 2016, beginning in 2011, the County contracted annually with the Economic Development Corporation (EDC) — a 501(c)(6) private nonprofit membership corporation — to implement the policies and programs of the County's Economic Development Element. That said, in a March 2014 letter to the League of Women Voters of Fresno, the EDC stated that it was "*not directly involved in the economic development element of the County's General Plan.*" Even so, the County's 2017 contract with the EDC stated that the EDC, in coordination with the County, was "*also responsible for implementing policies and programs of the Economic Development Element.*" These seemingly contradictory statements suggest the possibility of a misunderstanding with regard to these shared responsibilities, and it may be that neither party is taking the steps needed to fully implement the County's Economic Development Element.

## A LOOK AT THE 2015-2023 HOUSING ELEMENT

Although state law allows local governments to decide when to update their respective general plans, Government Code Section 65580 – 65589 requires that housing elements be updated every eight years. Fresno County’s current Housing Element, adopted March 15, 2016, covers the planning period of December 31, 2015 through December 31, 2023. Although the County’s Housing Element need not be updated until 2023, because state law requires that general plan elements be consistent with one another, the Housing Element must be reviewed for conformity with the rest of the General Plan whenever other elements of the plan are updated. (It should be noted that the County did not prepare an environmental impact report for the 2015-2023 Housing Element.)

Cities and counties typically work independently to develop their own housing elements; however, the development of the County’s 2015-2023 Housing Element was an interagency project spearheaded by the Fresno Council of Governments (**FCOG**). The participating agencies were the County of Fresno and these twelve cities: Clovis, Coalinga, Fowler, Huron, Kerman, Kingsburg, Mendota, Parlier, Reedley, San Joaquin, Sanger, and Selma. Development of the 2015-2023 Housing Element was coordinated to save costs and to provide an opportunity for local governments to cooperatively address countywide housing needs. As a result, the County’s 2015-2023 Housing Element is labeled “*multi-jurisdictional*.”

Each county must accommodate its fair share of regional housing needs, as determined through a process called a Regional Housing Needs Allocation. The California Department of Housing and Community Development (**HCD**) has identified the total housing needs for the Fresno region, and FCOG has determined that the housing allocation for unincorporated Fresno County for 2015 through 2023 is an additional 2,722 units, 987 of which (36%) must accommodate families with extremely low, very low and low incomes.

The 2015-2023 Housing Element contains 6 goals and 35 policies that are shared by the County and the 12 cities. The goals address these needs:

- New housing.
- Affordable housing.
- Neighborhood conservation.
- Special-needs housing.
- Fair and equal housing opportunities.
- Energy conservation and sustainable development.

Appendix 2 of the County’s 2015-2023 Housing Element contains 19 programs and 63 objectives that are specific to the unincorporated areas of Fresno County. (It should be noted that despite subject headings in Appendix 2 indicating that each of the 63 objectives includes a time frame for implementation, not all do. And, unlike the situation with the other six elements in the County’s General Plan, the Housing Element does not use the word “*shall*” to indicate that program implementation is obligatory.)

Government Code Section 65400 mandates that counties include in their annual general plan progress reports a special report on the implementation of their housing elements. (The housing report for Fresno County is included as Appendix B beginning on page 137.) Each year the County must complete several forms provided by the HCD, which summarize...

- Construction of very-low-, low- and mixed-income multifamily projects.
- Construction of above-moderate income units.
- Rehabilitation and preservation of existing housing units.
- Progress made in meeting regional housing needs.
- Implementation of the County’s housing programs.

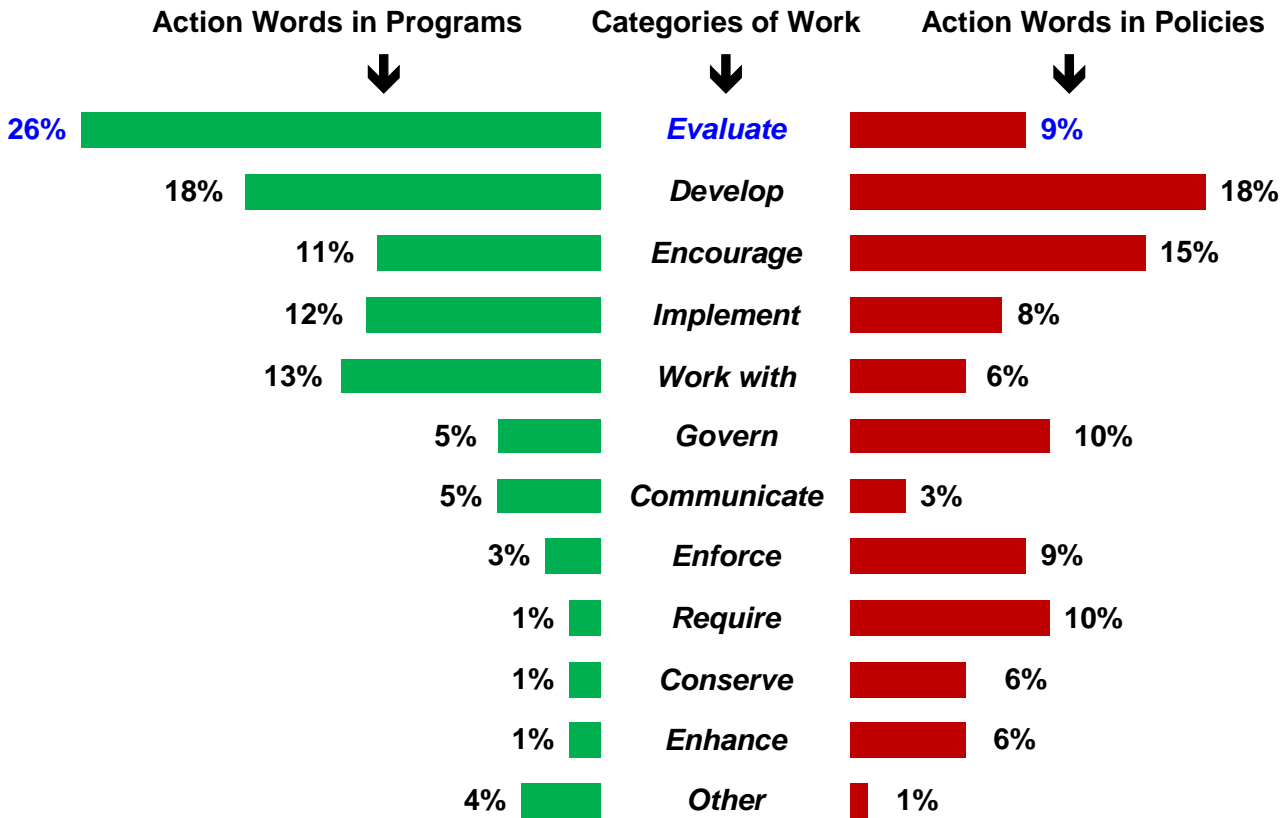
## WORK REQUIRED BY THE GENERAL PLAN

The 2000 General Plan Policy Document is a massive work plan describing hundreds of tasks to be undertaken primarily by the Department of Public Works and Planning, the Board of Supervisors and the County Administrative Office.

Approximately 170 different verbs (e.g., *access*, *acquire*, *adopt*) describe the actions needed to implement the 140 programs and 639 policies in the General Plan Policy Document. These action words can be grouped into 12 work categories.

As illustrated below, **26%** of the 140 General Plan programs and **9%** of the 639 General Plan policies all require the County to perform tasks encompassing some level of **evaluation**. The action verbs in this category include words such as these:

<i>amend</i>	<i>analyze</i>	<i>assess</i>	<i>compare</i>	<i>compile</i>	<i>determine</i>
<i>discuss</i>	<i>evaluate</i>	<i>examine</i>	<i>explore</i>	<i>identify</i>	<i>inventory</i>
<i>investigate</i>	<i>monitor</i>	<i>plan</i>	<i>prioritize</i>	<i>review</i>	<i>revise</i>



The modal verbs *shall*, *should* and *may* play an important role in the implementation of the General Plan. The word *shall* is defined in the Policy Document as an “*unequivocal directive*,” and the word *should* is defined as a less rigid directive that must be honored in the absence of countervailing considerations. The word *may* is not defined.

The word *shall* is written into every General Plan program (excepting those in the Housing Element), making implementation of these programs mandatory. Over 90% of General Plan policies also contain the word *shall*, making them mandatory as well. (Of note is the fact that while the County’s APRs routinely assess the implementation of General Plan programs, they have never analyzed the implementation of the policy side of the work plan – shown in red above.)

# IMPLEMENTATION OF THE GENERAL PLAN IN 2017

## ACTIVITY OF THE BOARD OF SUPERVISORS

The information below was taken from the minutes of the 28 Board meetings held in 2017.

Importantly, at no time in 2017 did the Board discuss any specific General Plan goals, nor did it hold hearings on the implementation of any specific General Plan policies or programs. That said, the Board did discuss a couple of matters related to General Plan policies, concluding that there was a need to review policies pertaining to the siting of solar facilities and flood control basins.

### General Plan Amendments

The Board amended the General Plan once during 2017. General Plan Amendment 548 changed the designation of a half-acre parcel from Agriculture to Industrial.

### Modifications to Zoning

The Board approved four Amendment Applications that modified zoning.

Application Number	Modification of Zone Districts	Acreage Affected
Amendment Application 3819	Uses Allowed in M-3(c)	19 acres
Amendment Application 3813	AL-20 to M-1(c)	5 acres
Amendment Application 3808	AL-20 to M-3(c)	22 acres
Amendment Application 3822	AL-20 to M-1(c)	<u>7 acres</u>
	Total:	53 acres

(Acreage figures are rounded to the nearest whole unit.)

### Parcel Splits

The Board heard four appeals of Planning Commission decisions denying parcel splits on acreage zoned Exclusive Agriculture (AE-20). In each case, the Board overturned the Planning Commission decision and granted the variance. The approvals created 4 new parcels.

Application Number	New Parcels		Original Parcel
Variance 4013	2.00 acres	11.82 acres	13.82 acres
Variance 4016	2.35 acres	2.42 acres	4.77 acres
Variance 4025	2.30 acres	2.55 acres	4.85 acres
Variance 3998	1.50 acres	17.36 acres	18.86 acres

### Discussion of the Ongoing Review / Revision of the General Plan

On May 16, 2017, County staff presented a status report to the Board regarding the ongoing review of the General Plan. As a result of that hearing, the Board gave direction to staff as follows: keep current policies regarding the Rural and Foothill Rural Residential designations, eliminate the Planned Urban Village designation, keep current policies regarding homesite parcels and modify Goal ED-A, Goal LU-D and the theme for economic development.

## Actions in Conflict with the General Plan

Four Board decisions in 2017 conflicted with policies and programs in the General Plan. The Board had the option to avoid the conflict by amending the General Plan but did not do so. Below is a brief description of those four decisions along with the policies with which the Board decisions conflicted.

Date	Board Decision	Conflicted with...
06-06-17 <sup>1</sup>	Approval of the 2016 Annual Progress Report	Policy OS-A.9
09-12-17 <sup>2</sup>	Structure of the Economic Development Action Team (EDAT)	Policy ED-A.3
10-31-17 <sup>3</sup>	Dissolution of the Water Advisory Committee	Policy OS-A.5
10-31-17 <sup>4</sup>	Continued suspension of public facilities impact fees	Policy PF-B.1

<sup>1</sup> The approved APR failed to include information on the implementation of General Plan environmental mitigation measures, as well as information from the County's groundwater monitoring program.

<sup>2</sup> The structure of the new EDAT did not meet the requirements of Policy ED-A.3.

<sup>3</sup> Policy OS-A.5 required that the Water Advisory Committee to remain in effect.

<sup>4</sup> Policy PF-B.1 required the County to continue to collect public facilities impact fees.

## Update of Documents

In 2017, the Board revised/updated these documents, all of which were either directly or indirectly related to the implementation of the General Plan:

Date	Document
05-02-17	2016 Comprehensive Economic Development Strategy
08-08-17	2017-2022 Road Improvement Program
09-18-17	MOU with the City of Reedley that expanded the city's sphere of influence by 120 acres
12-12-17	Annual Report of Transportation Mitigation Fee Activity

## Board Retreat

In October 2017, the Board held a two-day retreat at Harris Ranch (northeast of the city of Coalinga) to discuss the vision, mission, guiding principles and goals of the County. (These matters were not directly related to the implementation of the General Plan. They were related instead to the administration of county government.) As a result of the retreat, the Board adopted the following maxims:

Administrative Vision: *Working together for a quality of life for all*

Administrative Mission: *To provide excellent public services to our diverse community*

## Joint Meeting of the Board of Supervisors and Fresno City Council

On March 7, 2017, the Board approved a *Working Group* consisting of members of the Board of Supervisors, members of the Fresno City Council plus staff members from both agencies. The deliberations of the Working Group led to a joint meeting of the Board of Supervisors and the Fresno City Council on May 30, 2017, at which time the two bodies discussed emergency coordination, animal control and the cultivation and sale of marijuana.

## Issues Raised by the Public

In 2017, the Board heard from 21 people who addressed the Board under a standing agenda item entitled *Public Presentations*. That portion of each Board meeting was reserved for individuals who wished to bring to the attention of the Board matters not calendared on agendas. Because the minutes of Board meetings did not record the issues raised by these individuals, their concerns are recorded here. The public addressed the implementation of the General Plan on February 28 and October 17.

Date	Item of Interest Raised by the Public
01-10-17	County employee contract; housing for the homeless
01-31-17	Tax on housing (for the homeless) constructed by nonprofit organizations
<b>02-28-17<sup>1</sup></b>	<b>February 24 workshop on new General Plan Guidelines Prepared by OPR</b>
08-22-17	Graffiti in County islands; creation of a surveillance ordinance
09-12-17	County employee health benefits and salaries; County charter
<b>10-17-17<sup>2</sup></b>	<b>Continuing review and revision of the General Plan</b>
10-19-17	Guiding principles for County administration
10-19-17	Code enforcement

<sup>1</sup> On February 28, 2017, a member of the League of Women Voters of Fresno addressed the Board of Supervisors, thanking the County for helping to host a workshop on the draft update of the General Plan Guidelines prepared by the Governor's Office of Planning and Research.

<sup>2</sup> The League of Women Voters of Fresno, the Leadership Counsel for Justice and Accountability, and California Rural Legal Assistance requested that the Board schedule a public hearing to provide answers to a number of questions pertaining to the ongoing review and revision of the General Plan. The County chose not to hold the requested hearing, opting instead to provide answers by letter (sent November 14, 2017). Below is a list of some of the questions raised by the public on October 17, 2017 together with a brief summary of the County's written responses (brown type).

1. Is the year 2020 or the year 2025 the planning horizon for the current General Plan?  
*The planning horizon extends beyond 2020.*
2. Will 2040 be the planning horizon for the revised General Plan?  
*Per consultant contract #15-1280, the planning horizon is potentially 2040.*
3. Is the County in the process of updating the General Plan?  
*The term "update" has no legally defined meaning.*
4. Is there a record showing that environmental self-mitigation is functioning properly?  
*There is no single document, but all County environmental assessments can be reviewed.*
5. Will the scope of work for the revision of the plan be revised to meet new OPR Guidelines?  
*The scope of work is unchanged, except for an adjustment to address Senate Bill 1000.*

The public also inquired as to the County's plan for public participation in the review of the draft General Plan documents. The County did not respond either orally or in written form to this inquiry.

## ACTIVITY OF THE PLANNING COMMISSION

The information below was taken from the minutes of the 18 Planning Commission meetings held in 2017. Like the Board of Supervisors, during 2017, the Planning Commission did not discuss any specific General Plan goals, nor did it hold hearings on the implementation of any specific General Plan policies or programs.

### General Plan Amendments

The Planning Commission recommended approval of General Plan Amendment 548, which changed the designation of a half-acre parcel from Agriculture to Industrial. The amendment was subsequently approved by the Board of Supervisors.

### Modifications to Zoning

The Planning Commission recommended Board approval of five Amendment Applications that modified zoning. Four of the five applications are listed on page 8 under “*Activity of the Board of Supervisors.*” The fifth application, below, was approved by the Board on February 6, 2018.

Application Number	Modification of Zone Districts	Acreage Affected
Amendment Application 3816	AL-20 to M-1(c)	30.05 acres

### Parcel Splits

In addition to the four parcel splits approved by the Board on appeal of the Planning Commission’s denial of the same, the Planning Commission approved these seven parcel splits on acreage zoned Exclusive Agriculture (AE-20). The approvals created eight new parcels.

Application Number	New Parcels	Original Parcel
Variance 3987	2.00 acres, 2.50 acres, 14.26 acres	18.76 acres
Variance 4001	2.39 acres      2.39 acres	4.78 acres
Variance 4004	2.85 acres      54.31 acres	57.16 acres
Variance 4014	5.00 acres      14.68 acres	19.68 acres
Variance 4015	8.66 acres      8.67 acres	17.24 acres *
Variance 4027	2.50 acres      34.67 acres	37.17 acres
Variance 4033	1.72 acres      2.50 acres	4.22 acres

\* It is acknowledged that 8.66 acres plus 8.67 acres does not total 17.24 acres.

### Issues Raised by the Public

Only once during 2017 did members of the public address the Planning Commission on matters not on Commission agendas. On November 9, 2017, under *Public Presentations*, the President of the League of Women Voters of Fresno reminded the Commission that the County’s previous Annual Progress Report on the implementation of the General Plan did not meet state and local standards. She informed the Planning Commission that the League hoped the County’s 2017 APR, due April 1, 2018, would meet the state and local requirements delineated on pages 2 and 3 of this report.

## Approval of the Annual Progress Report (APR) for Calendar Year 2016

On March 30, 2017, the Planning Commission held a hearing to review and recommend approval of the County's APR for calendar year 2016.

The day prior to the hearing, the League of Women Voters of Fresno submitted to the Planning Commission a letter, along with a lengthy study from September 2016, asserting that the draft 2016 APR was incomplete. The letter stated, for example, that the County's 2016 APR did not include information from the County's Groundwater Management Program as required by Program OS-A.C and Policy OS.A.9.

At that hearing, some Planning Commissioners expressed displeasure with the large volume of reading material that had been furnished to them just hours before the hearing. The meeting ended without a recommendation from the Planning Commission. On April 13, 2017, the Planning Commission resumed its discussion of the APR, and although the staff report for that second hearing acknowledged that the APR was not in compliance with directives in Program OS-A.C and Policy OS-C.9, the Planning Commission recommended approval of the APR.

On June 26, 2017, the Board of Supervisors approved the 2016 APR recommended by the Planning Commission. In a report to the Board of Supervisors that day, County staff acknowledged that although some General Plan programs were not being implemented as written, their implementation was nonetheless effective. The County did not identify the programs that were not being implemented as written.

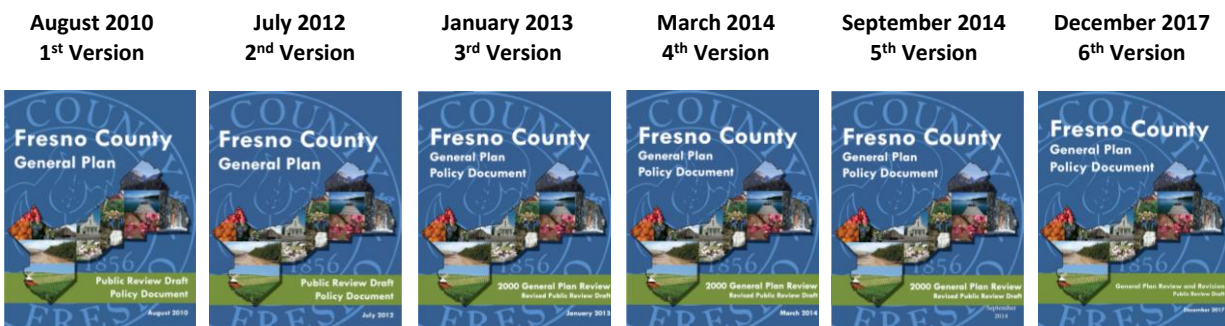
### ACTIVITY OF THE PLANNING DEPARTMENT

Other than the Annual Progress Report for 2016, County planning staff did not prepare any reports during 2017 regarding the implementation of the General Plan nor did it engage in any community outreach regarding the pending revision of the plan.

During all of 2017, the County's General Plan website did not display any information related to the ongoing review and revision of the General Plan. In the summer of 2016, the County removed such information from its website. Eighteen months later, in January 2018, the information was restored to the County website with the simultaneous release of the December 2017 draft revision of the General Plan Policy Document (6<sup>th</sup> proposed revision), December 2017 draft update of the General Plan Background Report and the December 2017 draft update of the Zoning Ordinance.

The public was then afforded a 69-day comment period. The 295-page draft Policy Document was redlined to show changes to text. The draft Background Report and draft Zoning Ordinance, which totaled 1,138 pages, were not redlined, as they were completely new documents.

Below are copies of the front pieces of the six versions of the draft revision of the General Plan Policy Document that appeared on the County's website beginning in 2010. The December 2017 version of the draft revision is available on the Fresno County website at this time.





## MONITORING SYSTEMS

It's imperative that the County routinely monitor implementation of the General Plan. To that end, the state and the County have defined three mechanisms for doing that: (1) annual progress reports, (2) five-year reviews, and (3) environmental mitigation monitoring.

**Please note: The bolded text within quotations and citations on pages 13 through 17 is used to highlight information and is not part of any original text.**

### ANNUAL PROGRESS REPORTS (APRs)

#### (A State and County Requirement)

Although state law and the County's General Plan both require annual monitoring of the implementation of the General Plan, there is some disparity between public expectation and County practice. And even though the 2000 General Plan does not contain a statement committing the County to routinely monitor the plan's implementation, the introduction to Part 3 of the County's 2017 draft revised General Plan Policy Document does. That paragraph is reprinted below in its entirety.

***"The County is committed to annually reviewing its progress in implementing the goals and policies of the General Plan. Since many of the factors and issues that the General Plan addresses change from year-to-year, an annual review and reporting of implementation will help ensure the County is moving forward to achieve the Plan's vision. This review will report on the status of each specific implementation program in the General Plan and take into account the availability of new implementation tools, changes in funding sources, and feedback from Plan monitoring activities."***

The paragraph above correctly states that the County annually reports the status of each General Plan program. The paragraph also embellishes somewhat, for the County's APRs do not report on *"its progress in implementing the goals and policies of the General Plan."*

The County's first APR for the 2000 General Plan reviewed the first 21 months of the implementation of the new plan (from the adoption of the plan on October 3, 2000 to the end of the first fiscal year, June 30, 2002). That first APR correctly reported that the County was seriously working to implement the General Plan as written. Importantly, the report recommended that the Board of Supervisors establish a comprehensive *"indicators program"* to track program implementation and the achievement of General Plan goals by monitoring essential data such as population change, agricultural land conversion and changes in housing trends. The 2002 APR also presented a way forward for the much-needed update of regional and community plans.

Despite this good beginning, in 2003, the County stopped preparing APRs, and for the next ten years, plan implementation was not monitored.

The preparation of APRs resumed in 2013 with the preparation of a two-year report for calendar years 2013 and 2014, and subsequent APRs were prepared for calendar years 2015, 2016 and 2017. These APRs focused primarily on program implementation and not on progress toward achieving General Plan goals. And unlike the 2002 APR, they did not contain recommendations for amending the plan or improving its implementation.

As a result, the APRs from 2013 to 2017 did not provide the Board of Supervisors with sufficient information to enable it to identify necessary course corrections or ways to improve plan implementation.

## FIVE-YEAR REVIEWS

### (A County Requirement)

The introduction to the 2000 General Plan explains the purpose of five-year reviews.

*“A general plan is a long-term document with a planning horizon of 15 to 25 years. To achieve its purposes, the plan must be flexible enough to respond to changing conditions and at the same time specific enough to provide predictability and consistency in guiding day-to-day land use and development decisions. Over the years, conditions and community needs change and new opportunities arise; the plan needs to keep up with these changes and new opportunities....Every five years, the County will thoroughly review the countywide plan and update it as necessary.”*

The requirement to conduct five-year reviews is codified in the Agriculture and Land Use Element. Program LU-H.E and Policy LU-H.14 both read as follows:

*“The County shall conduct a major review of the General Plan, including General Plan Policy Document and Background Report, every five years and revise it as deemed necessary.”*

The General Plan anticipated that such reviews would be prepared every five years — 2005, 2010 and 2015; however, none of those reviews were completed. The County initiated the 2005 review in late 2005, and fourteen years later, the County is still working on that first review. Clearly, five-year reviews have not been a good tool for monitoring plan implementation.

With the December 2017 draft revision of the General Plan, the County is proposing to alter its commitment to conducting five-year reviews. Below is the proposed change to Program LU-H.E. Note the change from “*shall*” to “*should*.”

*“The County ~~shall~~ should conduct a major review of the General Plan, ~~including General Plan Policy Document and Background Report,~~ every five years and revise it as deemed necessary.”*

## ENVIRONMENTAL MITIGATION MONITORING

### (A State and County Requirement)

California Government Code 21081.6 requires the County to monitor the implementation of adopted environmental mitigation measures.

California Government Code 21081.6

*“(b) A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures.”*

This statutory requirement is reflected in General Plan Program LU-H.D, which reads...

*“The Planning Commission shall review the General Plan annually, focusing principally on actions undertaken in the previous year to carry out the implementation programs of the plan. The Planning Commission’s report to the Board of Supervisors shall include, as the Commission deems appropriate, recommendations for amendments to the General Plan. **This review shall also be used to satisfy the requirements of Public Resources Code 21081.6 for a mitigation monitoring program.**”*

The Environmental Impact Report (**EIR**) prepared for the adoption of the 2000 General Plan concluded that implementation of the plan would cause significant and unavoidable impacts to the environment, including these impacts to groundwater resources:

- Demand for water exceeding available supply, resulting in overdraft conditions.
- Exacerbation of groundwater overdraft conditions, resulting in land subsidence.

To lessen impacts such as these, the County identified 304 General Plan policies to serve as environmental mitigation measures. (See Appendix D, pp. 185-186, for a list of the unavoidable adverse impacts associated with the 2000 General Plan and the policies to lessen their impact.)

Copied below is the portion of the “Summary of Impacts and Mitigation Measures” section of the 2000 EIR which described the significant and unavoidable impact to groundwater. This section of the EIR also listed a set of policies to lessen that impact.

**Adverse Impact 4.8-1:** *“Development under the Draft [2000] General Plan could result in the demand for water exceeding available supply, resulting in overdraft conditions and potential adverse effects on groundwater recharge potential.”*

**Mitigation Measures:** *“No mitigation is available beyond Draft General Plan Policies PF-C.1 through PF-C.9, PF-C.11 through PF-C.13, PF-C.16 through PF-C.18, PF-C.21 through PF-C.24, PF-C.30, PF-E.14, PF-E.17, OS-A.1 through OS-A.9, OS-A.11 through OS-A.15, OS-A.17 through OS-A.19, OS-A.21, and OS-A.28 for Fresno County.”*

**Level of Significance after Mitigation** *“Significant and Unavoidable”*

Policy OS-A.1 (underlined above) is one of several policies identified as mitigation to lessen the adverse impact from the overdraft of groundwater. It reads...

**Policy OS-A.1** *“The County shall develop, implement, and maintain a plan for achieving water resource sustainability, including a strategy to address overdraft and the needs of anticipated growth.”*

Because mitigation measures are designed to protect the environment, their implementation must be enforced, and routine monitoring is the best way to guarantee that enforcement.

It appears the County has not routinely monitored the implementation of Policy OS-A.1 or any of the other General Plan policies serving as mitigation measures for the 2000 General Plan. As a result, there is little to no evidence that these 304 mitigation measures have been implemented.

Interestingly, the October 3, 2000 staff report to the Board of Supervisors for the adoption of the 2000 General Plan stated that it would not be necessary to monitor such mitigation measures. The staff report read in part: “...the measures that would reduce environmental impacts take the form of policies and programs that are part of the ‘project itself’ [General Plan].” And the 2000 EIR stated, “The General Plan Update is intended to be self-mitigating; it is **assumed** impacts identified in this EIR would generally be mitigated through adopted federal, State, and local laws and regulations, **through the implementation of identified General Plan policies, ...or some combination thereof...**”

That assumption has proved wrong. Self-mitigation only works when policies are faithfully implemented, and routine monitoring is the only way to substantiate that success.

## RECOMMENDATIONS TO THE BOARD OF SUPERVISORS

Annual progress reports (APRs) should provide the information necessary for the Board of Supervisors to identify needed changes to the General Plan. Such information is especially important at this time because the County is now fully engaged in a comprehensive review and update of the plan — a revision that must serve county residents well for the next 20 years. County planning staff is recommending that the Board of Supervisors significantly modify over half of the programs and nearly a fifth of the policies in the General Plan Policy Document. In addition, staff is in the process of preparing a completely new General Plan Background Report.

General Plan Program LU-H.E directs the Planning Commission to include in its annual progress reports, as appropriate, recommendations to the Board of Supervisors for amendment of the plan.

### Program LU-H.D

*“The Planning Commission shall review the General Plan annually, focusing principally on actions undertaken in the previous year to carry out the implementation programs of the plan. **The Planning Commission’s report to the Board of Supervisors shall include, as the Commission deems appropriate, recommendations for amendments to the General Plan.** This review shall also be used to satisfy the requirements of Public Resources Code 21081.6 for a mitigation monitoring program.”*

The Planning Commission’s 2017 APR did not recommend any revisions to the General Plan. Neither did the Commission’s APRs for 2013/14, 2015 and 2016. However, the Commission’s first APR in 2002 did, and it is in line with that first APR that the following eight recommendations are made to the Board of Supervisors.

### Addition of an Indicators Program

Several months prior to the adoption of the October 2000 General Plan, in a letter to the County dated April 6, 2000, the League of Women Voters of Fresno (**League**) recommended that the County develop an indicators program. Indicators are data of various types which, when collected over a period of time, serve as a tool to evaluate progress toward the attainment of General Plan goals. The letter read in part...

*“A report on the annual status of the Plan is important, so that the County can judge the effectiveness of the Plan, whether it is meeting Plan goals, and whether specific amendments are appropriate. An annual assessment of indicators for the status of the General Plan would be helpful.”*

The County endorsed the concept, and the Planning Commission’s first APR in 2002 (approved by the Board of Supervisors on June 10, 2003) devoted 12 pages to the concept. A portion of the 2002 APR is printed below.

*“**Progress toward attainment of the General Plan goals can be measured** in various ways including formal actions on applications, completion of implementation programs, and **through ‘indicators.’** The concept of indicators was discussed during the General Plan update along with the importance of the Annual Report.... In an effort to promote the use of indicators in the annual report the Sustainability Committee (Committee) of the League of Women Voters has initiated a ‘pilot project’ to develop a set of indicators for two elements of the General Plan under the themes of economic development and agricultural land protection....It is anticipated that the results of this ‘pilot project’ will be provided to the County staff for its work on the next annual report. Initial indicator data has been compiled for the themes of urban centered growth and agricultural land protection along with the additional topic of affordable housing.”*

Two months later, on August 26, 2003, the League made a formal presentation to the Board of Supervisors regarding a pilot indicators project. The Board meeting agenda read as follows:

*“Consider presentation on Pilot Indicator Project ‘Using Indicators to Track Changes in Implementation of the Fresno County General Plan’ by League of Women Voters, and consensus Resolution adopted by Fresno County Planning Commission recommending use of indicators in future Annual Reports on General Plan.”*

The minutes of that hearing stated that the Board *“directed staff to return to the Board with [an] implementation plan on the indicators for use on a regular basis...”*

Despite that Board direction, the County did not institute an indicators program. In 2006, as comment on the initiation of the five-year review of the General Plan, the League again recommended that the County adopt an indicators program. As a consequence, the County’s first draft revision of the General Plan Policy Document (August 2010) contained a new program directing the County to develop an indicators program. The proposed program read as follows:

New Program LU-H.C

***“The County shall develop an Indicators Program that monitors the success of the County in achieving the goals of the General Plan. The County shall conduct an annual review of the Indicators Program and report the findings to the Planning Commission and Board of Supervisors.”***

This same language was retained in the next four versions of the draft revision of the Policy Document. However, the County deleted new Program LU-H.C from the most recent draft revision of the Policy Document (December 2017).

**Recommendation 1.** The County should adopt a General Plan program to develop and implement an indicators program. The data from the indicators program can be used to annually evaluate success toward achieving the goals of the plan.

## Update of Regional and Community Plans

The General Plan contains approximately 40 regional and community plans, most of which are seriously out of date. By way of illustration, the chart below, taken from the staff report for a March 12, 2013 Board of Supervisors workshop on the five-year review of the General Plan, lists the most recent updates of the County’s 10 unincorporated community plans.

Unincorporated Community Plan	Date of Adoption	Last Update	Status	Estimated Cost
Biola Community Plan	12/15/81	05/22/90	No progress	\$200,000
Caruthers Community Plan	10/31/78	06/29/93	No progress	\$200,000
Del Rey Community Plan	10/31/78	11/27/90	In progress	\$150,000
Easton Community Plan	03/24/64	12/18/89	No progress	\$200,000
Friant Community Plan	02/18/76	02/01/11	Complete	N/A
Lanare Community Plan	12/20/77	12/21/82	No progress	\$150,000
Laton Community Plan	07/17/73	07/10/12	Complete	N/A
Riverdale Community Plan	07/17/73	09/29/92	No progress	\$250,000
Shaver Lake Community Plan	10/31/78	05/27/86	No progress	\$550,000
Tranquillity Community Plan	02/18/76	12/18/84	No progress	\$200,000

The chart on the previous page shows that, with the exception of the Friant and Laton Community Plans, which were updated in 2011 and 2012, respectively, the average year of the last update of the remaining 8 plans is 1988, which means that the plans have an average age of 30 years — well beyond the commonly accepted general plan life of 15 to 25 years.

And with the exception of the Friant and Shaver Lake areas, these communities are known to have a greater percentages of low-income households — with median incomes that are at least 20% below the state average. Some of these areas also have chronic problems associated with inadequate water quality/supply and poor wastewater infrastructure. As long as these 8 community plans remain antiquated, residents will have difficulty upgrading their communities.

**Recommendation 2.** The County should add a program to the General Plan to ensure that community plans older than 20 years are updated within five years of the next update of the General Plan.

**Recommendation 3.** Since community plans have features in common, it is recommended, as a cost-saving measure, that the County consider the simultaneous update of such plans. There is precedent for this; for example, the chart on the previous page shows that the Caruthers, Del Rey and Shaver Lake Community Plans were adopted concurrently.

It may be possible, as well, to simultaneously update the County's regional plans, which average 24 years since their last update. For example, to save costs, it may be possible to concurrently update the Sierra-North and Sierra-South Regional Plans.

### **Identification of a Dedicated Revenue Stream for General Plan Implementation**

In 2016, based on information derived from the County's 2015 APR, the League conducted a study of the success of General Plan implementation. That League study, released September 1, 2016, determined that for 2015 the County could demonstrate successful implementation of only 39% of its General Plan programs. A recalculation in 2018 based on the County's 2017 APR showed that the County was able to implement, as designed, even fewer of those same programs.

The 2016 study also found that one department — the Department of Public Works and Planning — was completely or partially responsible for implementing 103 of 121 programs (85%) in the first six elements of the plan. (It is responsible for implementing 18 of 19 programs in the Housing Element.)

The County readily acknowledges that a lack of resources is largely responsible for its inability to fully implement the General Plan. The County's very first APR (2002) contained this sobering comment.

*“While progress has been made for most of the programs there are some programs where progress has not been made within the timeframe set out in the particular implementation program. The lack of progress is principally due to the allocation of resources associated with funding and/or staffing.”*

A decade later, a similar statement appeared in the County's 2013/2014 APR.

*“In order to fully implement the County's General Plan Implementation Programs, an on-going dedicated funding stream is required. The various programs have not been fully implemented for a number of reasons, including the lack of available funding. Staff will continue to implement all outstanding Programs for which the Department is responsible as funding and staffing resources are available.”*

The lack of a dedicated funding stream limits the County's ability to successfully implement General Plan programs and achieve General Plan goals.

**Recommendation 4.** With respect to Program LU-H.D, which calls for the preparation of annual progress reports (**APRs**), the County should amend the program to require identification of a dedicated revenue stream to cover the cost of implementing the plan for subsequent calendar years.

**Recommendation 5.** The County should augment the Planning and Land Use Section of the Development Services Division within the Department of Public Works and Planning with at least two staff positions dedicated solely to implementation of the General Plan — by way of example, one position dedicated to the development and update of planning documents, as well as to the funding thereof, and a second position dedicated to monitoring implementation of existing plans, programs and policies.

### **Establishment of an Effective Economic Development Action Team (EDAT)**

In 1997, the Board of Supervisors launched a 4-year public process to craft a new Economic Development Element for the General Plan, which was subsequently adopted October 3, 2000. The foundation for the new element was a document prepared a year earlier (November 15, 1999) called a *Comprehensive Economic Development Strategy (CEDS)*.

The new Economic Development Element and the new CEDS (both adopted by the Board of Supervisors on October 3, 2000) outlined a fresh and innovative role for the County — that of strong regional leadership in the development and coordination of economic planning.

To implement the County's new Economic Development Strategy, Program ED-A.B and Policy ED-A.3 required the County to establish and staff an Economic Development Action Team (**EDAT**) "*composed of County departments, including the Agricultural Commissioner, city representatives, and regional organizations engaged in the various facets of economic development in the county.*"

Below are citations from the 2000 CEDS that describe the function and makeup of the EDAT.

*"The Action Team would be charged with the responsibility of creating the initiatives necessary to provide the economic foundations for job growth and to ensure that the benefits of growth are gained by local workers through workforce development activities."* (2000 CEDS, p. 2)

*"The Action Team will review all economic foundations identified in the economic strategy and develop specific initiatives to address the requirements of the targeted industries through redirection and/or increase in the resources currently available to participating institutions....."* (2000 CEDS, p. 37)

*"Implementation of the economic development strategy...will require the participation of organizations in the county that have resources essential to achieving its goals and objectives. These organizations will serve on an Action Team appointed by the Board of Supervisors. Their responsibility will be to develop supporting initiatives in land use, infrastructure, quality of life, labor force preparedness, capital availability and access to technology."* (2000 CEDS, p. 39)

*“The following are examples of the type of business groups that should be included on the Action Team.”* (2000 CEDS, pp. 41, 42)

(Listed were the Fresno County Economic Development Corporation, the Fresno Business Council, the Fresno Metropolitan Chamber of Commerce, the Hispanic Chamber of Commerce, the Fresno County Farm Bureau, the Building Industry Association of the San Joaquin Valley, the I-5 Business Development Corridor, and the Five Cities Consortium.)

*“Both educational and training organizations must be a part of the Action Team so that appropriate initiatives can be developed to insure that the Fresno County labor force is job ready when employment opportunities become available. The following are some of the key educational and training organizations that should be a part of the Action Team.”* (2000 CEDS, pp 42, 43)

(Listed were the Business Center at CSU Fresno, the Training Institute at Fresno City College, West Hills College, Fresno County Superintendent of Education, Fresno County Workforce Development Board, and Fresno Works.)

The citations above describe an action team composed of a diverse group of highly qualified institutions and organizations with expertise in economic development.

But that wasn't the makeup of the County's first EDAT. On April 23, 2002, as reported in the County's first APR under the new plan, *“the Board of Supervisors was designated as the Economic Development Action Team to implement the Economic Development Element of the County General Plan.”*

That Board decision was in conflict with Policy ED-A.3 (written out on the previous page), and it ran contrary to the CEDS guidelines in that the 2002 EDAT did not include the Agricultural Commissioner, city representatives or regional organizations engaged in various facets of economic development in the county.

Within a few years the EDAT stopped functioning, and according to County documents, around the year 2011, the County began contracting annually with the Fresno County Economic Development Corporation to oversee the County's Comprehensive Economic Development Strategy and help with the implementation of policies and programs in the County's Economic Development Element.

On September 12, 2017, the Board of Supervisors reestablished the EDAT. But just as it did in 2002, the Board failed to include on the EDAT any organizations with expertise in economic development. The Board recreated the EDAT as a standing committee composed of County elected officials and administrators, and as occasions warranted, the mayors and city managers of the county's 15 cities. The new EDAT was to meet on an as-needed basis to accomplish these three tasks:

- *“Work with County staff to implement the...goals of the Economic Development Element:... (1) Job Creation, (2) Economic Base Diversification and (3) Labor Force Preparedness;*
- *Assist County staff in reviewing the Economic Development Element of County General Plan [i.e., engage in discussions on County policy]; and*
- *Provide direction to County staff regarding economic development projects in the unincorporated area of Fresno County” on an as-needed basis.*



The County is proposing, through its December 2017 draft revision of the General Plan, to incorporate into the General Plan the Board's September 12, 2017 change in the composition of the EDAT. The draft change appears in the 2017 draft Policy Document as redlined below.

~~"The County shall support and staff an Economic Development Action Team (EDAT) with the following composition:~~

~~a. Two members of the Board of Supervisors: The Chairman or another Supervisor designated by the Chairman and the Supervisor whose district includes the city(ies) that the EDAT is working with at a given time.~~

~~b. County departments (County Administrative Officer and Public Works and Planning Director).~~

~~a.c. City representatives (Mayor, Council President, and City Manager for the City of Fresno and mayor and city manager for the city(ies) involved in the project. The County shall support use support and staff an, as needed, an Economic Development Action Team Teams (EDAT) composed of two Board of Supervisors (Chairman or another Supervisor designated by the Chairman, and other position will rotate to the Supervisor whose district includes the City(ies) that the EDAT is working with at a given time), County departments (County Administrative Officer and Public Works and Planning Director), including the Agricultural Commissioner, city representatives, (Mayor, Council President and City Manager for the City of Fresno and Mayor and City Manager for the City(ies) involved in the project, and regional organizations, and others engaged in the various facets of economic development in the county."~~

[Note: The confusing redlining (with some sections both underlined and lined out) is the result of the County's January 26, 2018 release of its December 2017 Public Review Draft of the Policy Document in tracking mode.]

In conflict with the requirements of General Plan Policy ED-A.3, the Board of Supervisors has never appointed an Economic Development Action Team composed of regional organizations engaged in various facets of economic development. In 2002, the Board of Supervisors appointed itself the Action Team to oversee countywide economic development, and in 2017, the Board decided the EDAT should be made up of elected officials and county and city managers. To achieve the County's goals for economic development, the Board must appoint people and organizations with expertise in economic development.

### **Recommendation 6.**

The County should retain Program ED-A.B and Policy ED-A.3 as originally written and appoint an Economic Development Action Team that includes the entities listed in Policy ED-A.3, including regional organizations engaged in various facets of economic development.

The County's 2016 Comprehensive Economic Development Strategy reported on page 63 that the General Plan was being "*updated with a new Economic Development Element.*" It is clear that the December 2017 draft revision of the General Plan completely reworks the County's Economic Development Element. The proposal is to...

- Delete 50% of the County's economic programs and significantly alter another 33%.
- Delete 20% of the County's economic policies and significantly alter another 42%.

The proposed changes are massive, and this raises questions as to whether the County is responding to an underlying fault in the original design of the element or whether the County is extricating itself from economic planning altogether. In either case, the situation calls for analysis by experts in economists and a reappraisal of County engagement in economic planning.

### **Recommendation 7.**

The County should initiate a complete reexamination of its strategy for engaging in economic development, especially in light of (1) County planning staff's proposal to wholly rework the Economic Development Element, (2) the need for assistance from the Economic Development Corporation to implement the Economic Development Element and (3) the continuing chronic poverty that exists in unincorporated areas of the county. These matters need review by experts in both economics and regional planning.

### **Year's Postponement in the Update of the General Plan**

In the fall of 2005, the County launched a five-year review of the 2000 General Plan. The purpose of the review was *"to evaluate the Goals, Policies and Implementation Programs of all General Plan Elements to ensure they reflect changed conditions, priorities, and new laws since the adoption of the General Plan in 2000."* (December 4, 2012 staff report to the Board)

County staff was unable to complete that review, and over time the project morphed into a comprehensive update of the General Plan with a new planning horizon to the year 2040. Because the County failed to inform the public that the 2000-2020 review had become a 2020-2040 update, county residents were not afforded an opportunity to comment on the planning needs and challenges for the new planning period (2020-2040). Had county residents been given an opportunity to comment, they would likely have underscored issues related to health and safety — e.g., the County's aging public facilities and infrastructure, the lack of affordable housing, the pending impacts of climate change and the lack of a sustainable water supply.

With respect to climate change, Government Code Section 65302(g)(4) mandates that Fresno County include a climate adaptation plan in its Health and Safety Element — either directly or by reference — upon the next update of its Multi-Hazard Mitigation Plan. The County began the process of updating its Multi-Hazard Mitigation Plan in 2017, and a public review draft of the plan was released in April 2018. That draft plan acknowledges that climate change has the potential to exacerbate known hazards such as flooding and fire. The County's mitigation strategy for coping with climate change is to rely on the iteration of General Plan policies as proposed for revision in the County's draft 2017 Policy Document. Below is wording from page 3.16 of the Draft Fresno County Multi-Hazard Mitigation Plan (April 2018).

*"The references to the General Plan policies in Section 4.4 of this [Multi-Hazard Mitigation] plan were reviewed by Mintier Harnish [the consulting firm that prepared the Draft 2017 Policy Document] and Department of Public Works staff to reflect recent changes that will be in the updated General Plan."*

Importantly, the County's draft 2018 Multi-Hazard Mitigation Plan does not contain an analysis demonstrating that the *"changes that will be in the updated General Plan"* will succeed in mitigating the effects of climate change. Furthermore, the General Plan policy changes listed in the draft 2018 Multi-Hazard Mitigation Plan have not undergone environmental review, nor have they been approved by the Board of Supervisors.

With respect to water supply, the Department of Water Resources has found that four of the five groundwater sub-basins underlying Fresno County are in "critical overdraft," and California Water Code Section 10720.7 requires newly formed groundwater sustainability agencies (**GSAs**) with jurisdiction over groundwater basins in Fresno County to have groundwater sustainability plans (**GSPs**) in place by January 31, 2020. It is commonly believed that these new GSPs will have profound, long-lasting impacts on land use development patterns in Fresno County.

The fact is that several significant planning efforts are occurring simultaneously. Sometime during 2019, the County will seek to update its Multi-Hazard Mitigation Plan. Also that year, the GSAs will release their draft groundwater sustainability plans for public review, and the County will likely submit for public review an EIR for the update of the General Plan and Zoning Ordinance.

**Recommendation 8.**

The County should delay the update of the General Plan for one year — to 2020.

By the end of 2019, the groundwater sustainability agencies (**GSAs**) will have completed their groundwater sustainability plans (**GSPs**). The information and policies from those plans can then be incorporated into the draft update of the General Plan Background Report and Policy Document.

The EIR for the update of the General Plan and Zoning Ordinance can then be completed. Presumably, the EIR will contain a comprehensive evaluation of the degree to which changes to the Policy Document will ensure better management of groundwater use and help county residents adapt to the effects of climate change.

Following completion of the EIR, the Board of Supervisors can approve an update of the General Plan and Zoning Ordinance. The County can also concurrently adopt an updated Multi-Hazard Mitigation Plan and incorporate it by reference into the General Plan.

Delaying the update of the General Plan for one year will also allow time for the County to hear from residents regarding what they see as the planning needs and challenges for the period from 2020 to 2040.



## APPENDIX A

### 2017 APR — IMPLEMENTATION OF THE FIRST SIX ELEMENTS OF THE GENERAL PLAN

California Government Code 65400 requires that once an agency has adopted a general plan, it must provide to the state an annual report (**APR**) on progress made in implementing the plan. Below is the relevant portion of that code.

*“California Government Code Section 65400(a): After the legislative body has adopted all or part of a general plan, the planning agency shall do...the following:*

*⋮*

*(2) Provide by April 1 of each year an annual report to the legislative body, the Office of Planning and Research, and the Department of Housing and Community Development that includes all of the following:*

*(A) The status of the plan and progress in its implementation.”*

*⋮*

In answer to this requirement, Fresno County’s 2000 General Plan includes Program LU-H.D, which requires the Planning Commission to *“review the General Plan annually, focusing principally on actions undertaken in the previous year to carry out the implementation of programs of the Plan.”*

#### Program Labels

Programs in the Fresno County General Plan are identified either by letter or by number.

- For the first six elements of the General Plan, programs are identified by a 4-letter label. For example, the first program in the Economic Development Element is labeled *ED-A.A.*
- Programs in the Housing Element are labeled differently. This is because development of the Housing Element was overseen by a different agency — the Fresno County Council of Governments. (The report on the Housing Element is found in Appendix B, pp. 137 - 181.)

Each of the 19 programs in the Housing Element is identified by number; for example, the first program is aptly labeled *Program 1*. But unlike programs in the first six elements of the General Plan, Housing Element programs are subdivided into components labeled *“objectives.”* Because these objectives are bulleted and not identified by number or letter, it has been necessary to assign each a number. For example, the first objective of the first program in the Housing Element *has been labeled H-1.1*, the second objective in the first program *H-1.2* and so on.

Employing a letter code for the first six elements of the General Plan and a number code for the Housing Element is workable but awkward, so to make reference quick and easy, each of the programs and objectives has been assigned a number from 1 to 184. Since there are 121 programs in the first six elements of the General Plan, those program are numbered 1 to 121, and since there are 63 program components (objectives) in the Housing Element, those 63 components are numbered 122 through 184.

With regard to General Plan programs, this APR assesses the implementation of 184 individual tasks, which are either programs in the first six elements of the General Plan or program objectives in the Housing Element.

## Assessment Methodology

To help focus attention on the essential features of each program or program objective, each is rewritten as a “*deliverable*.” Doing so enables the reader to hone in on the individual tasks that require implementation.

The example below shows Economic Development Program ED-A.G rewritten as a set of two deliverables. The original text from the General Plan is at the left; the set of deliverables at the right.

### Full Text of Program ED-A.G

*“The County shall determine, in cooperation with existing agencies, if capital deficiencies exist for farmers with the capital costs of shifting production modes to crops that create higher employment levels. If such deficiencies are identified, the County, in partnership with existing agencies, shall work to access additional funds or redirect existing funds.”*

### Program ED-A.G Expressed as Deliverables




1. Determination of the existence of capital deficiencies for farmers shifting to production modes that create greater employment.
2. In partnership with other agencies, an effort to access or redirect existing funds should such deficiencies be identified.

The assessment of program implementation was based primarily on information taken from the County’s annual progress reports for 2002, 2013/2014, 2015, 2016 and 2017. (Normally an APR focuses on a single calendar year, but for the League’s 2017 APR, the inquiry was widened to include all that the County had reported since plan adoption in 2000.) The 2002 APR covered the period from General Plan adoption in October 2000 to the end of the first fiscal year (June 2002). There was little information available for the years 2003 through 2012 because the County did not prepare APRs during that period. The APR approved in 2014 assessed program implementation for two calendar years: 2013 and 2014. The APRs for 2015, 2016 and 2017 reported on the calendar years for which they were named.

Secondary sources of information included various County publications, including staff reports prepared for the Planning Commission and Board of Supervisors.

## Report on Program Status

Once available information from each of the previous County APRs was compiled and reviewed, each program was color tagged as follows:

-  Good evidence of successful implementation.
-  Poor evidence of successful implementation.  
Only partial evidence of implementation.
-  No evidence by which to confirm successful implementation.  
Evidence that implementation was delayed or not implemented per directives in the plan.

The chart beginning on the next page contains these four columns.

- Column 1: Individual numbering of each program in the first six elements of the General Plan from 1 through 121 with a color tag to indicate the degree of implementation.
- Column 2: The County’s original 4-letter label for each program.
- Column 3: The success of implementation, as described in the County’s APRs.  
The program’s potential revision based on the December 2017 draft Policy Document.
- Column 4: The success of implementation as described by the League.

## APPENDIX A

# PROGRESS TOWARD THE IMPLEMENTATION OF PROGRAMS IN THE FIRST SIX ELEMENTS OF THE GENERAL PLAN

## 2000 ECONOMIC DEVELOPMENT ELEMENT

1	ED-A.A	<p><b>Deliverable:</b> Creation of a staff position to serve as liaison/facilitator and support for the County's economic development programs and Economic Development Action Team.</p>	
		<p><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that on April 23, 2002, the Board of Supervisors created the position of Assistant County Administrative Officer for Economic Development.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>"On August 9, 2011, the Fresno County Board of Supervisors entered into a contract with the Economic Development Corporation which among other things is responsible for implementation of the Economic Development Element programs."</i></p> <p><b>2016 APR</b></p> <p>The County's 2016 appraisal of program implementation is printed in full below:</p> <p>(Note: Were it not for the addition of the underlined text below, the appraisal of program implementation in the County's 2015 and 2016 APRs would be identical.)</p> <p><i>"On August 9, 2011, the Fresno County Board of Supervisors entered into a contract with the Economic Development Corporation which among other things is responsible for implementation of the Economic Development Element programs. <u>As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have</u></i></p>	<p><b>League Reporting</b></p> <p>The County does not currently have a liaison/facilitator staff position, but it did some years ago. According to the County's first APR (dated May 2003), on April 23, 2002, the Board of Supervisors "created the position of Assistant County Administrative Officer for Economic Development." A few years later, the Board of Supervisors reversed itself and eliminated the position.</p> <p>The County's 2015 and 2016 APRs stated that in 2011 the County entered into a contractual arrangement with the Economic Development Corporation (EDC) "for implementation of the Economic Development Element programs." (That contract was renewed annually.)</p> <p>The County's 2017 APR stated that a "new policy and program" were being proposed for an Economic Development Action Team. (That proposal was not directly applicable to the program under review. It was, however, applicable to Program ED-A.B. Furthermore, the proposal was not for the addition of a new policy and program but rather for the rewrite of existing Policy ED-A.3 and for the elimination of Program ED-A.B.)</p> <p>On March 28, 2017, the Board of Supervisors directed County staff to evaluate the possibility of reestablishing the position of economic development liaison/facilitator. (The County's 2017 APR provided no information that staff followed through on that directive.)</p>

		<p><u>served their purpose or are no longer relevant and should be deleted or revised.”</u></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of program implementation is printed in full below:</p> <p>(Note: Were it not for the deletion of the first sentence from the 2016 APR and the addition of the underlined text below, the appraisal of program implementation in the County's 2016 and 2017 APRs would be identical.)</p> <p><i>“As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised. <u>With respect to this Program, a new policy and program are proposed for development of an Economic Development Action Team consisting of members of the Board of Supervisors, County staff and city representatives.</u>”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: FY 00-01 → Ongoing.</p>	<p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program ED-A.A to read that the County will allocate resources toward economic development rather than establish a staff position to serve as liaison/facilitator and support for the County's economic development programs and Economic Development Action Team.</p> <hr/> <p><b>Conclusion:</b></p> <p>Currently, as required by Program ED-A.A, the County does not have a staff position to serve as liaison/facilitator and support for the County's economic development programs and Economic Development Action Team.</p> <p><b>Evidence of the successful implementation of Program ED-A.A during 2017:</b></p> <p>None.</p>
2	ED-A.B	<p><b>Deliverable:</b> Creation of and support for an Economic Development Action Team (EDAT) to coordinate countywide economic development.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that on April 23, 2002 the Board of Supervisors designated itself to be the Economic Development Action Team to coordinate countywide economic development and that, in that capacity, the Board had initiated the regional economic development projects/initiatives listed in Appendix B, Part I, of that APR.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 and 2016 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2002 APR stated that on April 23, 2002, the Board of Supervisors appointed itself to be the County's Economic Development Action Team (EDAT) coordinating countywide economic development.</p> <p>Not acknowledged in any County APR since then was the fact that some time later the EDAT ceased to exist.</p> <p>The County's 2015 and 2016 APRs stated that the County works with the Economic Development Corporation to coordinate countywide economic development.</p> <p>The County's 2017 APR stated that a “new policy and program” were being proposed for</p>

		<p><i>“The County’s Development Services Division works with the Economic Development Corporation serving Fresno County to coordinate countywide economic developments.”</i></p> <p><b>2017 APR</b></p> <p>The County’s 2017 appraisal of program implementation is printed in full below:</p> <p><i>“As part of the General Plan Review process, a new policy and program are proposed for development of an Economic Development Action Team consisting of members of the Board, of supervisors, [sic] County staff and city representatives to coordinate countywide economic development.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 00-01 → Ø</p>	<p>an Economic Development Action Team. (Actually, the proposal was not for the addition of a new policy and program but rather for the rewrite of existing Policy ED-A.3 and for the elimination of Program ED-A.B.)</p> <p>The 2017 APR explained that during 2017 the County considered a proposal to reestablish the EDAT as part of the General Plan Review process. On June 6, 2017, Board of Supervisors approved the formation of a new EDAT as a one-year pilot program to assemble a team made up of the elected officials, staff of the County, elected officials and staff of the city where a development project was proposed in order to coordinate economic development activities between the County and cities within the County.</p> <p>On September 12, 2017, the Board of Supervisors approved an EDAT consisting of elected officials, County staff and the staffs of various city planning departments.</p> <p>(It should be noted that the makeup of the new EDAT was inconsistent with General Plan Policy ED-A.3, which required that the EDAT also include the Agricultural Commissioner and regional organizations engaged in facets of economic development.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The Economic Development Action Team created September 12, 2017 does not meet the requirements of General Plan Policy ED-A.3.</p> <p><b>Evidence of the successful implementation of Program ED-A.B during 2017:</b></p> <p>Poor.</p>
3	ED-A.C	<p><b>Deliverable:</b> Evaluation at least every 5 years by an independent institution of the success in achieving the goals and targets of the County’s Comprehensive Economic Development Strategy.</p>	
<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for its completion was fiscal year 2005-2006.</p>		<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015 and 2016 APRs stated that in 2011 the County entered into a contractual arrangement with the Economic</p>	



	<p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>“On August 9, 2011, the Fresno County Board of Supervisors entered into a contract with the Economic Development Corporation which among other things is responsible for implementation of the Economic Development Element programs. The Economic Development Corporation regularly works to update the County's Economic Development Strategy.”</i></p> <p><b>2016 APR</b></p> <p>The County's 2016 appraisal of program implementation is printed in full below:</p> <p>(Note: Were it not for the addition of the underlined text below, the appraisal of program implementation in the 2015 and 2016 APRs would be identical.)</p> <p><i>“On August 9, 2011, the Fresno County Board of Supervisors entered into a contract with the Economic Development Corporation which among other things is responsible for implementation of the Economic Development Element programs. The Economic Development Corporation regularly works to update the County's Economic Development Strategy (CEDS). <u>As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised.</u>”</i></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of program implementation is printed in full below:</p> <p>(Note: Were it not for the deletion of the first sentence from the 2016 appraisal, which stated that the EDC was under contract with the County, the appraisal of program implementation in the 2016 and 2017 APRs would be nearly identical.)</p> <p><i>“The Economic Development Corporation works with the County to update the County's Economic Development Strategy (CEDS). As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and</i></p>	<p>Development Corporation (EDC) to implement the County's Economic Development Element programs and periodically update the County's Economic Development Strategy. (The contract is renewed annually.)</p> <p>Note: Unlike the County's 2015 and 2016 APRs, the County's 2017 APR did not include a statement that the EDC had the responsibility to implement programs in the County's Economic Development Element.</p> <p>None of the County's APRs addressed the deliverable required by Program ED-A.C, namely, the evaluation every 5 years by an independent institution of the County's success in achieving the goals and targets of its County's Comprehensive Economic Development Strategy.</p> <p>(It should be noted that the EDC would not have been considered an “independent” institution for this purpose in that it was paid by the County to periodically update that document and, therefore, would have had an economic interest in the outcome of the assessment of the 5-year evaluations.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The County did not employ an independent institution to evaluate, every 5 years, the success in achieving the goals and targets of the County's Comprehensive Economic Development Strategy.</p> <p><b>Evidence of the successful implementation of Program ED-A.C during 2017:</b></p> <p>None.</p>

		<p><i>should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised.</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 05-06 and every 5 years thereafter → ∅</p>	
4	ED-A.D	<p><b>Deliverable:</b> In cooperation with the county's 15 cities, creation of criteria for the location of value-added agricultural facilities in unincorporated areas of the County.</p>	
<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that work on this program would be initiated in fiscal year 2002-2003.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“This program has been implemented. The General Plan Policy LU-A.3 allows for the establishment of value-added processing facilities in areas designated Agriculture through approval of a discretionary permit subject to established criteria which includes analysis of service requirements for facilities and the capability and capacity of surrounding areas to provide the services required.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 01-04 → ∅</p>		<p style="text-align: center;"><b>League Reporting</b></p> <p>The 2015, 2016 and 2017 APRs stated that the program had been implemented because General Plan Policy LU-A.3 allowed for the establishment of value-added processing facilities in areas designated Agriculture.</p> <p>The County’s explanation is problematic because Policy LU-A.3 existed in its present form at the time the General Plan was adopted in 2000. The existence of the policy, therefore, is not evidence that the County, in cooperation with its 15 cities, created criteria for the location of value-added agricultural facilities in unincorporated areas of the County subsequent to Plan adoption in 2000.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not created, in cooperation with the county’s 15 cities, criteria for the location of value-added agricultural facilities in unincorporated areas of the County.</p> <p><b>Evidence of the successful implementation of Program ED-A.D during 2017:</b></p> <p>None.</p>	
5	ED-A.E	<p><b>Deliverable:</b> Establishment of a set of guidelines in staff reports for the analysis of the economic impacts of all discretionary decisions.</p>	
<p style="text-align: center;"><b>County Reporting</b></p>		<p style="text-align: center;"><b>League Reporting</b></p>	

		<p><b>2002 APR</b></p> <p>The 2002 APR stated that the County was in the process of preparing a policy recommendation that would define the type of agenda items where economic analysis would be required, that the focus would be on projects that had a significant impact on the local economy.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“Per direction from the CAO’s office the analysis of economic impacts are no longer required in the staff report for discretionary permits.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p><b>Modify program.</b> The County has proposed (through its December 2017 draft of the Policy Document) to amend Program ED-A.E to read that the County will provide in staff reports for discretionary decisions a summary of anticipated fiscal economic impacts.</p> <p><b>Change time frame: FY 00-01 → Ø</b></p>	<p>For several years following the adoption of the General Plan in 2000, the County included in its staff reports for discretionary projects an analysis of economic impacts. Based on this fact, it may be assumed that the County had at one time fully implemented Program ED-A.E and corresponding Policy ED-A.11, which is copied below:</p> <p><i>“The County shall routinely review the economic impacts of all policy, budgetary, and discretionary project decisions. To that end, staff reports for all discretionary decisions by the Board of Supervisors, Planning Commission, and other County decision-making bodies shall include an analysis of economic impacts along with fiscal impacts.”</i></p> <p>The County’s 2015, 2016 and 2017 APRs stated that at some point the County Administrative Office brought an end to that practice. (It must be noted that no County office or department has the authority to terminate a General Plan program. Only the Board of Supervisors has that legislative authority.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Even though, at an earlier time, the County did analyze the economic impacts of all policy, budgetary, and discretionary project decisions in staff reports as per the requirements of Program ED-A.E and Policy ED-A.11, the CAO’s office subsequently determined that such analysis was not required and ended the practice.</p> <p><b>Evidence of the successful implementation of Program ED-A.E during 2017:</b></p> <p>None.</p>
		<p><b>6</b></p> <p><b>ED-A.F</b></p> <p><b>Deliverable:</b> Contract with the Economic Development Corporation (EDC) to develop programs for marketing county produce.</p>	<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p>

	<p>The 2002 APR stated that the Economic Development Corporation (EDC) had developed several marketing efforts for Fresno county produce.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>“As previously mentioned, the EDC is the contracting agency for implementing policies of the Economic Development Element of the General Plan. The EDC has developed several marketing efforts for Fresno County produce.”</i></p> <p><b>2016 APR</b></p> <p>The County's 2016 appraisal of program implementation is printed in full below:</p> <p>(Note: Were it not for the addition of the underlined text below, the appraisal of program implementation in the 2015 and 2016 APRs would be identical.)</p> <p><i>“As previously mentioned, the EDC is the contracting agency for implementing policies of the Economic Development Element of the General Plan. The EDC has developed several marketing efforts for Fresno County produce. <u>As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised.</u>”</i></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of program implementation is printed in full below:</p> <p>(Note: Were it not for the deletion of the first sentence from the 2016 appraisal, which stated that the EDC was under contract with the County, the appraisal of program implementation in the 2016 and 2017 APRs would be identical.)</p> <p><i>“The EDC has developed several marketing efforts for Fresno County produce. As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their</i></p>	<p>The County's 2015, 2016 and 2017 APRs stated that the Economic Development Corporation (<b>EDC</b>) had developed several marketing efforts for county produce. However, the APRs did not provide specifics about that effort.</p> <p>The APRs also stated that the EDC was under contract with the County to implement policies in the County's Economic Development Element. The policy regarding the marketing of county produce reads as follows:</p> <p style="text-align: center;"><u>General Plan Policy ED-A.14</u></p> <p style="text-align: center;"><i>The County shall encourage and, where appropriate, assist the Economic Development Corporation to develop new markets for Fresno County farm produce.</i></p> <p>Program ED-A.F required the County to enter into contact with the EDC for the purpose of marketing county produce. The County's contract with the EDC for 2017 (Agreement No. 17-263, approved by the Board of Supervisors on June 20, 2017) did not address the marketing of county produce per se, and the APRs did not state that the EDC was actually under contract with the County to do so.</p> <hr/> <p><b>Conclusion:</b></p> <p>While the Economic Development Corporation may have been helping to market county produce in a general way, the APRs did not identify specific contracts for that purpose nor they did they provide descriptions of the EDC's efforts to help market county produce.</p> <p><b>Evidence of the successful implementation of Program ED-A.F during 2017:</b></p> <p>Poor.</p>

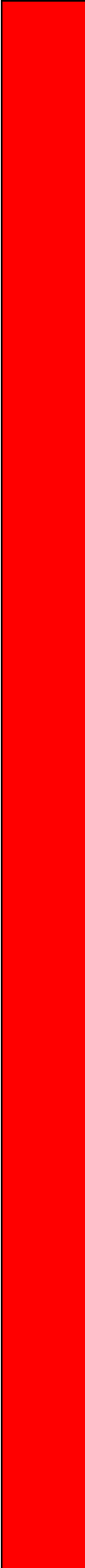
		<p><i>purpose or are no longer relevant and should be deleted or revised.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Ongoing → Ø</p>									
7	ED-A.G	<p><b>Deliverables:</b> Determination of the existence of capital deficiencies for farmers shifting to production modes that create greater employment.</p> <p>In partnership with other agencies, an effort to access or redirect existing funds should such deficiencies be identified.</p>	<table border="1"> <thead> <tr> <th data-bbox="979 394 979 625"></th> <th data-bbox="979 625 979 1971">County Reporting</th> <th data-bbox="979 394 979 625"></th> <th data-bbox="979 625 979 1971">League Reporting</th> </tr> </thead> <tbody> <tr> <td data-bbox="979 394 979 625"></td> <td data-bbox="979 625 979 1971"> <p><b>2002 APR</b></p> <p>The 2002 APR stated that progress had been stalled due to a weak agricultural economy and that lending institutions were not investing in California agriculture at that time.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in 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8	ED-B.A	<p><b>Deliverable:</b> Assemblage of a group of service providers to assess...</p> <p>(a) Telecommunications infrastructure needs (present and future) demanded by high technology firms and</p> <p>(b) The role of the County in facilitating those services.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that in July 2002 the Board of Supervisors created the Fresno Regional e-Government Taskforce to develop a plan for utilizing electronic information technology to improve the delivery of governmental services and to expand opportunities for economic development.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that this program was among 12 others that had been delayed <i>“for a number of reasons, including the lack of available funding.”</i></p> <p><b>2015 APR</b></p> <p>The 2015 APR stated that the program had been delayed. The County's 2015 appraisal of program implementation is printed in full below:</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the County created a taskforce in 2002 to develop a plan for utilizing electronic information technology to improve the delivery of governmental services and to expand the opportunity for economic development. The APRs stated that meetings of that taskforce were suspended in 2010 due to a lack of funding.</p> <p>The 2015, 2016 and 2017 APRs did not state that the County reconvened the taskforce or assembled a group of service providers to assess the need for telecommunications infrastructure demanded by high-technology firms.</p> <hr/>

		<p><i>“In July 2002 the Fresno Regional e-Government Taskforce was created to develop a plan for utilizing electronic information technology to improve the delivery of governmental services and to expand the opportunity for economic development. The group was instrumental in improving collaboration and data sharing between the County and the Cities of Fresno and Clovis. In January 2010, regular meetings were suspended due to lack of funding.”</i></p> <p><b>2016 and 2017 APRs</b></p> <p>The 2016 APR stated that the program had been delayed.</p> <p>The 2016 and 2017 APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p>(Note: Were it not for the addition of the underlined text below, the appraisal of program implementation in the 2015, 2016 and 2017 APRs would be identical.)</p> <p><i>“In July 2002 the Fresno Regional e-Government Taskforce was created to develop a plan for utilizing electronic information technology to improve the delivery of governmental services and to expand the opportunity for economic development. The group was instrumental in improving collaboration and data sharing between the County and the Cities of Fresno and Clovis. In January 2010, regular meetings were suspended due to lack of funding. <u>As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised.</u>”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-04 → Ø</p>	<p><b>Conclusion:</b></p> <p>While the County worked on a plan prior to 2010 for utilizing electronic information technology to improve the delivery of governmental services and to expand the opportunity for economic development generally, the County has not assembled a group of service providers to assess (1) the telecommunications infrastructure needs demanded by high technology firms and (2) the role County would play in facilitating those services.</p> <p><b>Evidence of the successful implementation of Program ED-B.A during 2017:</b></p> <p>None.</p>
	9	ED-B.B	<p><b>Deliverable:</b> Coordination of an initiative to deliver to existing and prospective businesses a comprehensive package of technical assistance regarding available technologies.</p>
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County’s Community Development Division had partnered with the Rapid Response Program of the Greater Fresno Chamber of</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the Economic Development Corporation (<b>EDC</b>) helped existing</p>

	<p>Commerce to provide technical assistance to new and existing businesses along the I-5 Business Development Corridor and in the Orange Cove and Parlier Renewal Community areas for the purpose of improving economic productivity.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>“EDC works to enhance the stability and growth of Fresno County’s existing companies by connecting them with specific resources, information and services with the primary objectives to assist businesses with expansions, survive economic difficulties, and make them more competitive in the wider marketplace.”</i></p> <p><b>2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p>(Note: Were it not for the addition of the underlined text below, the appraisal of program implementation in the 2015, 2016 and 2017 APRs would be virtually identical.)</p> <p><i>“The Economic Development Corporation (EDC) works to enhance the stability and growth of Fresno County’s existing companies by connecting them with specific resources, information and services with the primary objectives to assist businesses with expansions, survive economic difficulties, and make them more competitive in the wider marketplace. <u>As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised.</u>”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-04 → Ø</p>	<p>businesses expand, survive economic difficulties and be more competitive in the wider marketplace.</p> <p>The 2015, 2016 and 2017 APRs provided no evidence that the County had coordinated an initiative to deliver to existing and prospective businesses a comprehensive package of technical assistance regarding available technologies.</p> <hr/> <p><b>Conclusion:</b></p> <p>While it is true that the Economic Development Corporation aides existing companies by providing resources, information and services, there is no indication in the County’s APRs that the County — either on its own or in coordination with the EDC — pioneered an initiative to deliver a comprehensive package of technical assistance regarding available technologies to existing and prospective businesses.</p> <p><b>Evidence of the successful implementation of Program ED-B.B during 2017:</b></p> <p>None.</p>
10	ED-B.C	<p><b>Deliverable:</b> Creation of a roundtable of financial institutions, venture capital firms and finance agencies to determine the need for greater access to capital for existing non-agricultural businesses.</p>





**County Reporting**

**2002 APR**

The 2002 APR stated (1) that the County was part of the San Joaquin Valley Regional Community Development Entity, which was formed to provide additional capital for economic development projects in the Central San Joaquin Valley and (2) that representatives from federal agencies, banks, local economic development organizations, community development organizations and non-profit organizations had been meeting to develop a concept and model for a new Community Development Financial Institution.

**2013/2014 APR**

The 2013/2014 APR did not report on this program.

**2015 APR**

The County's 2015 appraisal of program implementation is printed in full below:

*"The Economic Development Corporation (EDC) through its Business Expansion, Attraction, and Retention (BEAR) Action Network program works with businesses seeking to locate or expand in Fresno County and works to assist with financing and microloan programs."*

**2016 and 2017 APRs**

These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:

(Note: Were it not for the addition of the underlined text below, the appraisal of program implementation in the 2015, 2016 and 2017 APRs would be identical.)

*"The Economic Development Corporation (EDC) through its Business Expansion, Attraction, and Retention (BEAR) Action Network program works with businesses seeking to locate or expand in Fresno County and works to assist with financing and microloan programs. As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised."*

**Recommendations in the Draft 2017 Policy Document**

**League Reporting**

The County's 2015, 2016 and 2017 APRs did not indicate whether the effort begun around 2002 to create a model for a new Community Development Financial Institution had succeeded.

The APRs stated that the Economic Development Corporation provided assistance with financing and microloan programs for businesses seeking to locate or expand in the county.

The 2015, 2016 and 2017 APRs provided no evidence that the County had created a roundtable of financial institutions, venture capital firms and finance agencies to determine the need for greater access to capital for existing non-agricultural businesses.

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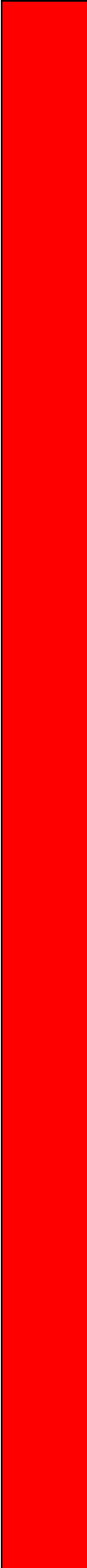
**Conclusion:**

There is no indication in the County's APRs that the County created a roundtable of financial institutions, venture capital firms and finance agencies or that the work of such a group had determined the need for greater access to capital for existing non-agricultural businesses.

**Evidence of the successful implementation of Program ED-B.C during 2017:**

None.

		<p>Delete program.</p> <p>Change time frame: FY 02-03 → Ø</p>	
11	ED-B.D	<p><b>Deliverable:</b> Initiation of a planning process to identify additional recreational opportunities in the coast range foothills and other areas where “gateway opportunities” exist.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Fresno County Tourism Committee had initiated meetings on the Westside to begin to identify potential recreational opportunities in the area near Coalinga.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County recently participated in the Friant Corridor Feasibility Study to identify opportunities and constraints for possible land use changes and development activities related to recreation, resource and cultural awareness, conservation, tourism, and supportive commercial uses. On May 10, 2016, the Board of Supervisors considered the study and chose to set the study aside.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 01-02 → 2018-?.</p> <p>(The question mark in the time frame above is written in place of the year because that portion of the County’s Draft 2017 Policy Document is unreadable.)</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County had prepared and then set aside in 2016 a Friant Corridor Feasibility Study. (The study was highly controversial, having been initiated and funded by development interests for the purpose of determining recreational opportunities for one specific area of Fresno County — within an area of 5,346 acres located along a 6-mile stretch of Friant Road running from the Fresno City limits to the town of Friant near Millerton Lake.)</p> <p>The 2015, 2016 and 2017 APRs did not state that the County had initiated a “planning process” that identified recreational opportunities elsewhere in Fresno County, including the coast range foothills or that there had been any activity regarding this program during 2017.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not initiated a “planning process” to identify additional recreational opportunities in the coast range foothills and other areas where gateway opportunities exist.</p> <p><b>Evidence of the successful implementation of Program ED-B.D during 2017:</b></p> <p>None.</p>
12	ED-B.E	<p><b>Deliverables:</b> Ongoing evaluation of business marketing programs and funding of the Visitor and Convention Bureau.</p> <p>Investment, as appropriate, in programs that attract business travel to the county.</p>	



**County Reporting**

**2002 APR**

The 2002 APR stated that the County’s Community Development Division and the County Administrative Office were working with the Fresno County Tourism Committee and with community leaders to finalize a Master Plan for Tourism, which would include plans for the funding and realignment of the Convention and Visitor’s Bureau (now referred to as the Fresno/Clovis Convention and Visitors Bureau.)

**2013/2014 APR**

The 2013/2014 APR did not report on this program.

**2015 APR**

The County’s 2015 appraisal of program implementation is printed in full below:

*“The County has contracted with the Fresno Economic Development Corporation to work with the Visitor and Convention Bureau to develop and implement effective marketing programs that attract business and travel to the county.”*

**2016 and 2017 APRs**

These APRs contained nearly identical appraisals of the implementation of the program. The 2017 APR appraisal is printed in full below:

(Note: Were it not for the addition of the underlined text below, the appraisal of program implementation in the 2015, 2016 and 2017 APRs would be virtually identical.)

*“The Fresno Economic Development Corporation in cooperation with the Visitor and Convention Bureau works on developing effective marketing programs that attract business and travel to the County. As part of the General Plan Review process, policies and programs of the Economic Development Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised.”*

**Recommendations in the Draft 2017 Policy Document**

Delete program.

Change time frame: FY 00-01 → Ø

**League Reporting**

The County’s 2015, 2016 and 2017 APRs did not indicate whether the Master Plan for Tourism identified in the 2002 APR had been finalized and implemented.

The County’s 2015 APR stated that the Economic Development Corporation (EDC) was under contract with the County to help the Convention and Visitor’s Bureau develop and implement effective marketing programs that attract business and travel to the county. However, the County’s contract with the EDC for 2017 (Agreement No. 17-263, approved by the Board of Supervisors on June 20, 2017) did not address the Convention and Visitor’s Bureau per se.

In addition, the County’s 2015, 2016 and 2017 APRs provided no evidence that the EDC had evaluated the business marketing programs of the Convention and Visitor’s Bureau or that the County had evaluated the funding needs of that entity or had invested in programs that attract business travel to the county.

**Conclusion:**

Due to the absence of information in the County’s APRs demonstrating that the County had overseen the evaluation of business marketing programs and funding for the Convention and Visitor’s Bureau, there was no basis upon which to conclude that Program ED-B.E was being successfully administered.

**Evidence of the successful implementation of Program ED-B.E during 2017:**

None.

13	ED-C.A	<b>Deliverable:</b> Collaboration with the Workforce Development Board and community colleges to develop a countywide workforce preparation system.	
	<b>County Reporting</b>	<b>League Reporting</b>	
		<p><b>2002 APR</b></p> <p>The 2002 APR stated that the County's Department of Employment and Temporary Assistance had partnered with 11 entities, including adult schools, community colleges, government agencies and community-based organizations, to consolidate employment and training activities.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"Fresno County is an active participant on the Fresno Regional Workforce Investment Board which serves to mobilize and integrate all private and public partners to effectively educate, train and place individuals with the necessary resources and skills to fulfill employer needs in the County."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Retain time frame: Ongoing.</p>	<p>The County's 2015, 2016 and 2017 APRs stated that Fresno County was an active participant on the Fresno Regional Workforce Investment Board which served to mobilize and integrate private and public partners to educate, train and place individuals into jobs.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program ED-C.A to read that the County will maintain the existing workforce preparation system.</p> <hr/> <p><b>Conclusion:</b></p> <p>Although there was no direct evidence that the County participated in the development of a workforce preparation "system;" because the County proposed (through its December 2017 draft Policy Document) to maintain the existing workforce preparation system, it may be assumed that such a system had been developed.</p> <p><b>Evidence of the successful implementation of Program ED-C.A during 2017:</b></p> <p>Good.</p>
14	ED-C.B	<b>Deliverable:</b> Development of a CalWORKs labor pool skills inventory for businesses seeking employees	
	<b>County Reporting</b>	<b>League Reporting</b>	
		<p><b>2002 APR</b></p> <p>The 2002 APR stated that the County's Department of Employment and Temporary Assistance had partnered with the California Employment Development Department to develop skill sets for positions in local industries.</p> <p><b>2013/2014 APR</b></p>	<p>The County's 2015, 2016 and 2017 APRs stated that the County had developed an automated Welfare Employment Preparedness Index to generate a list of clients possessing specific employment skills.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program ED-C.B to read that the</p>

		<p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“A skills inventory was developed for positions in local industries. This was used as the basis for a coded skills inventory using the automated Welfare Employment Preparedness Index. The system could then be queried and sorted by specific skills and can produce a list of clients meeting given criteria.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: FY 01-02 → Ongoing.</p>	<p>County will provide the existing inventory upon request.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the County proposed (through its December 2017 draft Policy Document) to make the existing CalWORKs labor pool skills inventory available upon request, it may be assumed that that such a program had been developed.</p> <p><b>Evidence of the successful implementation of Program ED-C.B during 2017:</b></p> <p>Good.</p>
15	ED-C.C	<p><b>Deliverable:</b> Improvement of employment and retention tracking systems for CalWORKs recipients.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County’s Department of Employment and Temporary Assistance used an automated system developed for use by counties throughout the state to record and track employment information.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The Department of Social Services uses an automated system developed for use by counties throughout the State to record employment information.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: FY 00-01 → Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the Department of Social Services used an automated system developed for counties throughout the state to track employment information for CalWORKs recipients.</p> <p>On the assumption that an automated statewide system was an improvement over a tracking system that the County may have used prior to 2000, it may be assumed that by using, instead, a statewide system, the County improved its ability to track employment and retention for CalWORKs recipients.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program ED-C.C to read that the County will continue to improve and maintain the existing tracking system. (This draft revision of Program ED-C.C was odd in that it suggested that the County had the ability to improve and maintain an automated tracking system used by counties throughout the state.)</p>

			<p><b>Conclusion:</b></p> <p>It appears the County is using the best statewide technology for tracking employment and retention for CalWORKs recipients.</p> <p><b>Evidence of the successful implementation of Program ED-C.C during 2017:</b></p> <p>Good.</p>
16	ED-C.D	<p><b>Deliverable:</b> Ongoing assistance to the Economic Development Corporation (EDC), placement agencies and businesses for the assessment of the work availability and readiness of CalWORKs recipients.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County's Department of Employment and Temporary Assistance engaged in a number of activities to assess the job readiness of CalWORKs recipients.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"The County Department of Social Services through the CalWORKs program provides services such as job clubs, job fairs, participant assessments, adult basic education and vocational training. The County is also an active participant on the Fresno Regional Workforce Investment Board which serves to mobilize and integrate all private and public partners to effectively educate, train and place individuals with the necessary resources and skills to fulfill employer needs."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the County's Department of Social Services provided job placement services and that the County was an active member of the Fresno Regional Workforce Investment Board.</p> <p>The APRs did not provide information demonstrating that the County was assisting the Economic Development Corporation (EDC), placement agencies and businesses for the assessment of work availability and readiness of CalWORKs recipients.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program ED-C.D to read that the County will no longer assist the EDC in its efforts to assess the availability and work readiness of CalWORKs recipients but will, instead, assist placement agencies and businesses in their hiring of CalWORKs recipients.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County's APRs do not specifically address the County's assistance to the Economic Development Corporation, placement agencies and businesses for the</p>

			<p>assessment of the work availability and readiness of CalWORKs recipients.</p> <p><b>Evidence of the successful implementation of Program ED-C.D during 2017:</b></p> <p>Poor.</p>
17	ED-C.E	<p><b>Deliverable:</b> Ongoing collaboration with educational agencies and institutions, as well as the cities, to plan and fund a wide variety of services designed to promote employment.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County’s Department of Employment and Temporary Assistance continued to provide the Fresno County Office of Education with funds necessary to assist with job placement at adult schools.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County Department of Social Services through the CalWORKs program provides services such as job clubs, job fairs, participant assessments, adult basic education and vocational training. The County is also an active participant on the Fresno Regional Workforce Investment Board which serves to mobilize and integrate all private and public partners to effectively educate, train and place individuals with the necessary resources and skills to fulfill employer needs.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County provided services such as job clubs, job fairs, participant assessments, adult basic education and vocational training.</p> <p>The APRs did not provide information demonstrating that the County was collaborating with the county’s 15 cities to fund a wide variety of services to promote employment.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to make a large number of wording changes to Program ED-C.E; however, the changes did not constitute a major shift in the focus of the program.</p> <hr/> <p><b>Conclusion:</b></p> <p>While the County provides services such as job clubs, job fairs, adult basic education and vocation training, the County’s APRs did not demonstrate County collaboration with cities, nor did they describe the degree to which the County collaborated with educational agencies and institutions.</p> <p><b>Evidence of the successful implementation of Program ED-C.E during 2017:</b></p> <p>Poor.</p>
18	ED-C.F	<p><b>Deliverable:</b> Ongoing identification of employee skills required by the business clusters and industries targeted for expansion, attraction and development.</p>	

	<p style="text-align: center;"><b>County Reporting</b></p>	<p style="text-align: center;"><b>League Reporting</b></p>
	<p><b>2002 APR</b></p> <p>The 2002 APR stated that the County’s Department of Employment and Temporary Assistance had partnered with the California Employment Development Department to develop skill sets for positions in local industries and was working closely with the Economic Development Corporation to connect qualified clients with targeted industries.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The Fresno County Workforce Investment Board, the Employment Development Department and the Economic Development Corporation assist Fresno employers in meeting their labor needs by delivering outplacement, recruitment and training services.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Retain time frame: Ongoing.</p>	<p>The County’s 2015, 2016 and 2017 APRs stated that the County was working with the Fresno County Workforce Investment Board, state’s Employment Development Department and with the Economic Development Corporation to assist Fresno employers in meeting their labor needs by delivering outplacement, recruitment and training services.</p> <p>The APRs did not provide evidence that the County was engaged in identifying employee skills required by business clusters and industries targeted for expansion, attraction and development,</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program ED-C.F to read that the County will shift from identifying work skills to offering training in those skills.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County’s 2017 APR to support a conclusion that the County is engaged in identifying employee skills required by the business clusters and industries that the County has targeted for expansion, attraction and development.</p> <p><b>Evidence of the successful implementation of Program ED-C.F during 2017:</b></p> <p>None.</p>



## 2000 AGRICULTURE AND LAND USE ELEMENT

19	LU-A.A	<p><b>Deliverable:</b> Amendment of the Zoning Ordinance to ensure conformity with the Agriculture and Land Use Element of the 2000 update of the General Plan</p>	
		<p><b>County Reporting</b></p>	<p><b>League Reporting</b></p>
		<p><b>2002 APR</b></p> <p>The 2002 APR stated that the Zoning Ordinance had been amended to implement General Plan policies pertaining to the creation of homesite parcels and the number of residences permitted per parcel. The APR did not state that the program has been fully implemented.</p> <p><b>2013/2014, 2015 and 2016 APRs</b></p> <p>These APRs stated that this program had been implemented. (The 2017 APR did not state that the program had been implemented.)</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>“The County actively reviews and updates its Zoning Ordinance and Subdivision Ordinance to ensure consistency with the policies of the General Plan. The County completed a text amendment in 2015 to update its Zoning Ordinance to comply with requirements of state law as part of the 4<sup>th</sup>-Cycle Housing Element update. The County is also actively working on a comprehensive Zoning Ordinance Update scheduled to be presented to decision-makers in 2017.”</i></p> <p><b>2016 and 2017 APRs</b></p> <p>The APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County actively reviews and updates its Zoning Ordinance and Subdivision Ordinance to ensure consistency with the policies of the General Plan. The County is working on a comprehensive Zoning Ordinance Update to ensure consistency of the Ordinance with the policies of the General Plan.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p>	<p>At the time the General Plan was updated in 2000, the County recognized the need to bring the Zoning Ordinance into compliance with the new Plan. A number of programs addressed this need: LU-A.A, LU-D.A, LU-F.B, LU-G.A and LU-H.F.</p> <p>The County's 2015, 2016 and 2017 APRs did not provide a clear account of the degree to which the County had been able to accomplish that task. Although the APRs indicated that some progress had been made and that the County was continuing to work on a comprehensive update of the Zoning Ordinance, the APRs did not provide evidence that the program had been fully implemented — i.e., that the Zoning Ordinance had been brought into compliance with the Agriculture and Land Use Element as updated in 2000. In short, the County's APRs presented seemingly contradictory statements: (1) that the County continually updated the Zoning Ordinance to ensure consistency with the General Plan, (2) that Program LU-A.A had been implemented to bring the Zoning Ordinance into compliance with the General Plan, and (3) that the County was still working to make the Zoning Ordinance consistent with land use policies adopted in 2000.</p> <p>(It should be noted that even though the County's 2013/2014, 2015 and 2016 APRs stated that the Program LU-A.A had been implemented, the County has proposed through its December 2017 draft of the Policy Document to amend the time frame for accomplishing Program LU-A.A from FY 02-03 to calendar year 2018 or beyond.)</p> <hr/> <p><b>Conclusion:</b></p>

		<p>Retain program as is.</p> <p>Change time frame: FY 00-02 → 2018-?.</p> <p>(The question mark in the time frame above is written in place of the year because that portion of the County's Draft 2017 Policy Document is unreadable.)</p>	<p>While the County has made some progress in amending the Zoning Ordinance to ensure conformity with the 2000 update of the Agriculture and Land Use Element, the County's APRs did not clearly demonstrate that the County had completed that work.</p> <p><b>Evidence of the successful implementation of Program LU-A.A during 2017:</b></p> <p>Poor.</p>
20	LU-A.B	<p><b>Deliverables:</b> Evaluation of minimum parcel sizes necessary for sustained agriculture.</p> <p>Amendment of the Zoning Ordinance, as appropriate, to incorporate the results of the evaluation.</p>	
<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for its accomplishment was fiscal year 2003-2004.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that the program had been implemented. That appraisal is printed in full below:</p> <p><u>"Summary of Programs Implemented Thus Far:</u></p> <p style="text-align: center;">⋮</p> <p><i>Program LU-A.B, to evaluate agricultural parcel size. The County did evaluate non-prime contracted agricultural parcels for viability in 2008. Ultimately, no changes were adopted. Generally, the County has acknowledged that 20 acres on the valley floor provides a viable [agricultural] operation. [The] Zoning Ordinance includes minimum agricultural parcel sizes."</i></p> <p><b>2015 and 2016 APRs</b></p> <p>These APRs also stated that the program had been implemented. (The 2017 APR did not state that the program had been implemented.)</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>The APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"Policy LU-A.6 states that the County shall maintain twenty (20) acres as the minimum permitted parcel size in areas designated Agriculture, except as provided in</i></p>		<p style="text-align: center;"><b>League Reporting</b></p> <p>In December of 2008, the American Farmland Trust (<b>AFT</b>) authored a report on behalf of the Fresno Council of Governments entitled <i>Model Farmland Conservation Program for Fresno County</i>, which included this statement:</p> <p><i>"County General Plan Program (LU-A.B) calls for county to evaluate 'minimum parcel sizes necessary for sustained agricultural productivity.'"</i></p> <p>The 2008 AFT statement that Program LU-A.B called for a future evaluation of minimum parcel sizes necessary for sustained agricultural productivity, together with the County's statement in its 2013/2014 APR that only a portion of the county's farmland (non-prime acreage under Williamson Act contract) had been evaluated by 2008, suggested that as of 2008 the County had not completed an evaluation of minimum parcel sizes necessary for sustainable agriculture across the county.</p> <p>The County's 2015, 2016 and 2017 APRs stated that per General Plan Policy LU-A.6 the County maintained a minimum parcel size of 20 acres in areas designated Agriculture. However, since Policy LU-A.6 existed at the time the General Plan was updated in 2000, that policy, in itself, was not evidence that the County completed an evaluation of minimum</p>	

		<p><i>Policies LU-A.9, LU-A.10 and LU-A.11. The County may require parcel sizes larger than twenty (20) acres based on zoning, local agricultural conditions, and to help ensure the viability of agricultural operations.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 03-04 → Ø</p>	<p>parcel sizes after the adoption of the 2000 General Plan.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not completed an evaluation of minimum parcel sizes necessary for sustained agriculture in Fresno County.</p> <p><b>Evidence of the successful implementation of Program LU-A.B during 2017:</b></p> <p>Poor.</p>
21	LU-A.C	<p><b>Deliverable:</b> Development of a set of guidelines for the design and maintenance of agricultural buffers for new non-agricultural uses in agricultural areas.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for its accomplishment was fiscal year 2003-2004.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that this program was among 12 others that had been delayed <i>“for a number of reasons, including the lack of available funding.”</i></p> <p><b>2015 and 2016 APRs</b></p> <p>The 2015 and 2016 APRs also stated in their introduction section that the program had been delayed. (The 2017 APR did not state that the program had been delayed.)</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>The APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County requires buffers for certain land uses with the potential to hinder agricultural uses. For discretionary land use proposals including tentative tract maps, buffers are taken into consideration as part of project conditions. This has also been applied to utility-scale photovoltaic solar facilities with a general policy of 50 feet between panels or structures and surrounding agricultural properties.”</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015 and 2016 APRs stated that the program had been delayed (i.e., not implemented), and the County’s 2017 APR did not provide evidence that during 2017 the County developed a set of guidelines for the design and maintenance of agricultural buffers for new non-agricultural uses in agricultural areas.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program LU-A.C to read that the County will not develop guidelines for the design and maintenance of agricultural buffers but will, instead, design site-specific buffers for new non-agricultural uses at the time of project review and approval.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not developed a set of guidelines for the design and maintenance of agricultural buffers for new non-agricultural uses in agricultural areas.</p> <p><b>Evidence of the successful implementation of Program LU-A.C during 2017:</b></p> <p>None.</p>

		<p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time: FY 03-04 → Ongoing.</p>	
22	LU-A.D	<p><b>Deliverable:</b> Periodic assessment of the effectiveness of agricultural land preservation programs in furthering County agricultural goals and policies.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that two reviews had been completed – one in fiscal year 2000-2001 that focused on the Farmland Security Zone program and another in fiscal year 2001-2002 that focused on the potential effects of a state budget proposal to remove subvention funds (state reimbursements to the County from implementation of the Williamson Act).</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>The APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The Department of Public Works and Planning actively reviews the Williamson Act Program including reviewing (auditing) contracts for conformity with the State and County requirements and processing non-renewals for those contracts that do not meet the eligibility to remain in the Williamson Act Program. Staff also communicates with the State Department of Conservation on petitions for cancellations of contract and the County continues to utilize the Agricultural Land Conservation Committee to review cancellation petitions and forwards the Committee’s recommendations to the Board of Supervisors.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County effectively administered its Williamson Act program.</p> <p>The APRs did not provide evidence that the County periodically assessed the “effectiveness” of agricultural land preservation programs in furthering County agricultural goals and policies.</p> <p>In addition, the APRs only addressed the Williamson Act program and not other programs with the potential to preserve agricultural land, such as those listed in Policy LU-A.16: land trusts, conservation easements, dedication incentives, Farmland Security Act contracts, the California Farmland Conservancy Program Fund, agricultural education programs, zoning regulations, agricultural mitigation fee program, urban growth boundaries, transfer of development rights, purchase of development rights and agricultural buffer policies.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not conducted periodic assessments of the effectiveness of agricultural land preservation programs in furthering County agricultural goals and policies.</p> <p><b>Evidence of the successful implementation of Program LU-A.D during 2017:</b></p> <p>None.</p>

23	LU-A.E	<p><b>Deliverables:</b> Ongoing implementation of the County's Right-to-Farm Ordinance.</p> <p>Dissemination of information to the real estate industry to make the public aware of the Right-to-Farm Ordinance.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that copies of <i>right-to-farm</i> ordinances had been obtained from all counties and were being reviewed. The County was in the process of forming an ordinance improvement committee.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>The APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"The County staff utilizes the Right-to-Farm Ordinance notification process on many types of discretionary land use permits to insure that applicants or future property owners are aware of ongoing agricultural activities within the vicinity of discretionary projects. Further, County staff actively communicates with the Agricultural Commissioner's Office on discretionary projects proposed in agricultural areas and seeks comments from that Department."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the County used its Right-to-Farm Ordinance to notify those applying for discretionary land use permits of ongoing agricultural activities in the vicinities of their proposed projects.</p> <p>The APRs also stated that the County provided the same notification to future owners of property in agricultural areas.</p> <p>The APRs offered no explanation as to how it was possible for the County to provide notification to future property owners, nor did it provide evidence that the County disseminated information to the real estate industry to make the public aware of the Right-to-Farm Ordinance.</p> <hr/> <p><b>Conclusion:</b></p> <p>While the County has notified those applying for discretionary land use permits of the right of neighboring agricultural operations to continue agricultural activities, the County's APRs did not demonstrate that Right-to Farm information was being disseminated to the public through the real estate industry.</p> <p><b>Evidence of the successful implementation of Program LU-A.E during 2017:</b></p> <p>Poor.</p>
24	LU-A.F	<p><b>Deliverable:</b> In cooperation with various agencies, the development and implementation of a public outreach program on the advantages of participation in agricultural land conservation programs.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p>	<p style="text-align: center;"><b>League Reporting</b></p>

The 2002 APR stated that outreach to the Farm Bureau and to rural community newspapers was conducted in conjunction with the annual acceptance of applications for participation in the County's Agricultural Land Conservation Program. Furthermore, County staff was making referrals throughout the year to the Department of Conservation and to farmland trust organizations to promote participation in the County's Agricultural Land Conservation Program.

**2013/2014 APR**

The 2013/2014 APR did not report on this program.

**2015 APR**

The County's 2015 appraisal of program implementation is printed in full below:

*"The Board of Supervisors has adopted Resolutions of Support for land owners who wish to place their land under conservation easement. In 2015, the Board adopted one Resolution to place a 56-acre parcel in a conservation easement and in 2014 the Board adopted two Resolutions to place a total of 309 acres in a conservation easement."*

**2016 and 2017 APRs**

The APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2017 APR added the underlined sentence. The appraisal from the 2017 APR is printed in full below:

*"The Board of Supervisors has adopted Resolutions of Support for land owners who wish to place their land under conservation easement. In 2017, the Board adopted a Resolution to place 642 acres in a conservation easement. In 2015, the Board adopted one Resolution to place a 56-acre parcel in a conservation easement and in 2014 the Board adopted two Resolutions to place a total of 309 acres in a conservation easement. As part of the General Plan Review process, policies and programs of the Land Use Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised."*

**Recommendations in the Draft 2017 Policy Document**

Modify program.

Retain time frame: Ongoing.

The County's 2015, 2016 and 2017 APRs stated that the Board of Supervisors had adopted resolutions of support for four conservation easements during 2014, 2015 and 2017.

The APRs did not provide evidence that the County had developed and implemented a "public outreach program" on the advantages of participation in agricultural land conservation programs.

The County has proposed (through its December 2017 draft of the Policy Document) to make a necessary name change: replacing the name "Agricultural Land Stewardship Program Fund" with the name "California Land Conservancy [Program]."

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**Conclusion:**

There is no information in the County's APRs to indicate that the County has developed and implemented a public outreach program on the advantages of participation in agricultural land conservation programs.

**Evidence of the successful implementation of Program LU-A.F during 2017:**

None.

**Deliverable:** The active search for grants for conservation easements under the Agricultural Land Stewardship Program Act of 1995.

**County Reporting**

**2002 APR**

The 2002 APR stated that the County had supported applications for four conservation easements but did not indicate that the County had searched for grants on behalf of the applicants.

**2013/2014 APR**

The 2013/2014 APR stated that the County approved resolutions of support for two conservation easement applications but did not indicate that the County had searched for grants on behalf of the applicants.

**2015 APR**

The County's 2015 appraisal of program implementation is printed in full below:

*“The Board of Supervisors has adopted Resolutions of Support for land owners who wish to place their land under conservation easement. In 2015, the Board adopted one Resolution to place a 56-acre parcel in a conservation easement and in 2014 the Board adopted two Resolutions to place a total of 309 acres in a conservation easement. The Resolutions adopted by the Board in 2014 and 2015 were in support of obtaining grants from the Department of Conservation for placing certain parcels under conservation easement.”*

**2016 and 2017 APRs**

The APRs contained a nearly identical appraisal of the implementation of the program, The appraisal from the 2017 APR is printed in full below:

*“The Board of Supervisors continues to support land owners who wish to place their land under conservation easement, provided that the proposals meet certain required criteria.”*

**Recommendations in the Draft 2017 Policy Document**

Modify program.

Retain time frame: Ongoing.

**League Reporting**

The 2015 APR stated that the County had adopted resolutions in support of three conservation easements.

The 2016 and 2017 APRs stated that the County supported land owners who wished to place their lands under conservation easements.

No County APRs indicated that the County actively searched for grants for conservation easements.

The County has proposed (through its December 2017 draft of the Policy Document) to amend Program LU-A.G to read that the County will shift from actively pursuing grant funding to providing nonobligatory assistance to farming interests in their quests for grants under provisions of the California Farmland Conservancy Program.

**Conclusion:**

The County's APRs did not demonstrate that the County actively searched for grants for conservation easements under the Agricultural Land Stewardship Program Act of 1995.

**Evidence of the successful implementation of Program LU-A.G during 2017:**

None.

**Deliverable:** Creation of a program to establish criteria for prioritizing funding for agricultural conservation easements.

**County Reporting**

**2002 APR**

The 2002 APR stated (1) that the County utilized state criteria for the review of proposals for conservation easements and (2) that County criteria could most effectively be created at the time the County administered funding programs.

**2013/2014 APR**

The 2013/2014 APR did not report on this program.

**2015 APR**

The County's 2015 appraisal of program implementation is printed in full below:

*"The County uses the State's criteria in its review of proposals for support of landowners' requests for a Resolution of Support to obtain grants to place agricultural land under conservation easements."*

**2016 and 2017 APRs**

The APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:

*"The County uses the State's criteria in its review of proposals submitted by landowners requesting a Resolution of Support to obtain grants to place agricultural land under conservation easements. As part of the General Plan Review process, policies and programs of the Land Use Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised."*

**Recommendations in the Draft 2017 Policy Document**

Delete program.

Change time frame: FY 02-03 → Ø

**League Reporting**

The County's 2015, 2016 and 2017 APRs stated that the County used the state's criteria when reviewing proposals requesting County resolutions of support for grants supporting the placement of agricultural lands under conservation easements.

The APRs provided no evidence that the County had created a program to establish criteria for prioritizing funding.

**Conclusion:**

The County has not created a program to establish criteria for prioritizing funding for agricultural conservation easements.

**Evidence of the successful implementation of Program LU-A.H during 2017:**

None.



**Deliverables:** Assessment of...

- (a) Approaches to determining agricultural land values in the 1981 Farmland Protection Policy Act land evaluation and site assessment (LESA) system and the 1975 Tulare County Rural Valley Lands Plan and
- (b) The potential for developing a similar Process for Fresno County.

Establishment, if appropriate, of an agriculture quality scale system to assist in making land use conversion decisions.

### County Reporting

#### 2002 APR

The 2002 APR did not review this program because the target date for accomplishment was fiscal year 2003-2004.

#### 2013/2014

The 2013/2014 APR stated that this program was among 12 others that had been delayed *“for a number of reasons, including the lack of available funding.”*

#### 2013/2014, 2015, 2016 and 2017 APRs

These APRs each stated that program implementation had been delayed.

#### 2015, 2016 and 2017 APRs

The APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2016 and 2017 APRs added the underlined sentence. The appraisal from the 2017 APR is printed in full below:

*“The County has not yet assessed utilizing an agricultural quality scale system similar to LESA to establish a threshold as part of evaluation of converting agricultural land to non-agricultural uses. However, the impacts of projects on agricultural lands are analyzed for projects that may have a potential impact on conversion of agricultural land to non-agricultural uses as part of the environmental assessment of discretionary projects. As part of the General Plan Review process, policies and programs of the Land Use Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised.”*

#### Recommendations in the Draft 2017 Policy Document

### League Reporting

The County's 2013/2014, 2015, 2016 and 2017 APRs stated that the County had not initiated implementation of the program.

#### Conclusion:

The County has not assessed approaches to determining agricultural land values as per the requirements of Program LU-A.I.

#### Evidence of the successful implementation of Program LU-A.I during 2017:

None.

		<p>Delete program.</p> <p>Change time frame: FY 03-04 → Ø</p>	
28	LU-A.J	<p><b>Deliverables:</b> Maintenance of an inventory of lot size exceptions for agricultural areas granted by discretionary permit.</p> <p>Presentation of the inventory to the Board of Supervisors during the annual review of the General Plan.</p>	
		<p><b>County Reporting</b></p>	<p><b>League Reporting</b></p>
		<p><b>2002 APR</b></p> <p>The 2002 APR contained a list of lot size exceptions approved by the County.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not contain a list of lot size exceptions approved by the County.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>“During 2015 seven lot size exceptions were granted through provisions outlined in Policy LU-A.9. In addition, five lot size exceptions, specific to agricultural zoning, were granted through variance applications approved by the decision-making bodies. A list of the exceptions granted is included on Page 19 of the 2015 General Plan Annual Progress Report.”</i></p> <p><b>2016 APR</b></p> <p>The County's 2016 appraisal of program implementation is printed in full below:</p> <p><i>“During 2016 four lot size exceptions were granted through provisions outlined in Policy LU-A.9. In addition, nine lot size exceptions, specific to agricultural zoning, were granted through variance applications approved by the decision-making bodies. A list of the exceptions granted is included on Page 19 of the 2016 General Plan Annual Progress Report.”</i></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of program implementation is printed in full below:</p> <p><i>“During the 2017 calendar year, six lot size exceptions were granted through provisions outlined in Policy LU-</i></p>	<p>The County's 2015, 2016 and 2017 APRs described the lot size exceptions granted by the County in each of those years.</p> <p>(It should be noted that the County combined the lot size exception information from Programs LU-A.J and LU-B.A into a single tabulation.)</p> <p>(It should also be noted that the County's 2015 and 2016 APRs both stated that a list of lot size exceptions was found on page 19. Actually, the list of exceptions was found on page 20 in the 2015 APR and on page 18 in the 2016 APR.)</p> <p>After the 2017 APR was approved by the Board of Supervisors, the League of Women Voters of Fresno alerted the County that much of the information in the list of lot size exceptions was incorrect. The County subsequently agreed to correct the misinformation and resubmit the report to the state.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has an inventory of lot size exceptions for agricultural areas granted by discretionary permit and presents that information to the Board of Supervisors during the annual review of the General Plan.</p> <p><b>Evidence of the successful implementation of Program LU-A.J during 2017:</b></p> <p>Good.</p>

		<p>A.9. In addition, nine lot size exceptions, specific to agricultural zoning, were granted through variance applications approved by the decision-making bodies. A list of the exceptions granted is included on Page 9 of the 2017 General Plan Annual Progress Report.”</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Annually</p>	
29	LU-B.A	<p><b>Deliverables:</b> Maintenance of an inventory of lot size exceptions for Westside rangelands granted by discretionary permit.</p> <p>Presentation of the inventory to the Board of Supervisors during the annual review of the General Plan.</p>	
<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR contained a list of lot size exceptions approved by the County.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not contain a list of lot size exceptions approved by the County.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>“During 2015 seven lot size exceptions were granted through provisions outlined in Policy LU-A.9. In addition, five lot size exceptions, specific to agricultural zoning, were granted through variance applications approved by the decision-making bodies. A list of the exceptions granted is included on Page 19 of the 2015 General Plan Annual Progress Report.”</i></p> <p><b>2016 APR</b></p> <p>The County's 2016 appraisal of program implementation is printed in full below:</p> <p><i>“During 2016 four lot size exceptions were granted through provisions outlined in Policy LU-A.9. In addition, nine lot size exceptions, specific to agricultural zoning, were granted through variance applications approved by the decision-making bodies. A list of the</i></p>		<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs described lot size exceptions granted by the County in each of those years.</p> <p>(It should be noted that the County combined the lot size exception information from Programs LU-A.J and LU-B.A into a single tabulation.)</p> <p>(It should also be noted that the County's 2015 and 2016 APRs both stated that a list of lot size exceptions was found on page 19. Actually, the list of exceptions was found on page 20 in the 2015 APR and on page 18 in the 2016 APR.)</p> <p>After the 2017 APR was approved by the Board of Supervisors, the League of Women Voters of Fresno alerted the County that much of the information in the list of lot size exceptions was incorrect. The County subsequently agreed to correct the misinformation and resubmit the report to the state.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has an inventory of lot size exceptions for Westside rangelands granted by discretionary permit and presents that</p>	

		<p><i>exceptions granted is included on Page 19 of the 2016 General Plan Annual Progress Report.”</i></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of program implementation is printed in full below:</p> <p><i>“During the 2017 calendar year, six lot size exceptions were granted through provisions outlined in Policy LU-A.9. In addition, nine lot size exceptions, specific to agricultural zoning, were granted through variance applications approved by the decision-making bodies. A list of the exceptions granted is included on Page 9 of the 2017 General Plan Annual Progress Report. Also, a map showing the location of the granted lot size exceptions are included in the body of the 2017 Annual Report.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p>information to the Board of Supervisors during the annual review of the General Plan.</p> <p><b>Evidence of the successful implementation of Program LU-B.A during 2017:</b></p> <p>Good.</p>
30	LU-C.A	<p><b>Deliverable:</b> Update of the Kings River Regional Plan.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that there had been no activity regarding the update of the Kings River Regional Plan.</p> <p><b>2013/2014</b></p> <p>The 2013/2014 APR stated that this program was among 12 others that had been delayed <i>“for a number of reasons, including the lack of available funding.”</i></p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs also stated that program implementation had been delayed.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>The APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“Due to budgetary constraints and timing of other plan updates, implementation of this program has been delayed. There has been some renewed interest in</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2013/2014, 2015, 2016 and 2017 APRs stated that the program had not been implemented.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not updated the Kings River Regional Plan.</p> <p><b>Evidence of the successful implementation of Program LU-C.A during 2017:</b></p> <p>None.</p>

		<p><i>updating the plan, which has arisen with public interest in surface mining projects on the Kings River.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 02-03 → Ongoing.</p>	
31	LU-C.B	<p><b>Deliverable:</b> Evidence of working with the San Joaquin River Parkway and Conservation Trust (Parkway Trust), San Joaquin River Conservancy (Conservancy), City of Fresno and other agencies and organizations to implement the San Joaquin River Parkway Master Plan.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that County staff was attending meetings of the San Joaquin River Conservancy to remain current on Parkway activities.</p> <p><b>2013/2014, 2015 and 2016 APRs</b></p> <p>These APRs stated that the program had been implemented. (The 2017 APR did not state that the program had been implemented.)</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>The APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2017 APR added the underlined sentence. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The Recompiled San Joaquin River Parkway Master Plan was approved and adopted by the San Joaquin River Conservancy Governing Board on July 20, 2000. The San Joaquin River Conservancy started the process of updating the San Joaquin River Parkway Master Plan in June of 2013 that includes an update of policies and planned facilities, and the preparation of a Master EIR. The County has been participating as a member of the Interagency Project Development Committee.</i></p> <p><i>The County also regularly coordinates with the interested agencies / stakeholders with regard to project reviews to discuss and minimize possible project impacts to river resources.</i></p> <p><u><i>In 2017, County staff provided comments on the Draft EIR for the San Joaquin River Conservancy’s River West project. In the comments provided, staff emphasized support for public access at the</i></u></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the San Joaquin River Conservancy (<b>Conservancy</b>) was in the process of updating its Parkway Master Plan.</p> <p>The APRs also stated that the County was a member of the Conservancy’s Project Development Committee, which assisted the Conservancy by helping to develop and prioritize Conservancy projects.</p> <p>The APRs did not provide evidence that the County was helping to implement the plan by working with the Parkway Trust, the City of Fresno and other agencies and organizations.</p> <hr/> <p><b>Conclusion:</b></p> <p>While the County’s APRs demonstrated that the County was working with the Conservancy to implement the San Joaquin River Parkway Master Plan, the APRs did not indicate that the County was also working with the San Joaquin River Parkway and Conservation Trust, City of Fresno and other agencies and organizations.</p> <p><b>Evidence of the successful implementation of Program LU-C.B during 2017:</b></p> <p>Poor.</p>

		<p><u>intersection of Palm and Nees Avenues and EIR alternatives that encouraged such access.”</u></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	
32	LU-D.A	<p><b>Deliverable:</b> Amendment of the Zoning Ordinance to implement revisions of the General Plan concerning the Westside Freeway Corridor.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Zoning Ordinance had been amended to establish a process for the designation of major and minor interchanges along the Westside Freeway Corridor and that what was needed was a Westside Freeway Corridor overlay zone.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2013/2014, 2015 and 2016 APRs</b></p> <p>These APRs stated that the program had been implemented. (The 2017 APR did not state that the program had been implemented.)</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2016 and 2017 APRs added the underlined phrase. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“Revisions to the County Zoning Ordinance were approved March 27, 2001 by the Board of Supervisors to implement the revised provisions of this section concerning the Westside Freeway Corridor with approval of Amendment to Text Application (AT) No. 337 and subsequently amended with AT 352 in 2004. Therefore, this program has been implemented <u>and will be removed.</u>”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 00-01 → Ø</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that in 2004 the County revised the Zoning Ordinance to incorporate changes concerning the Westside Freeway Corridor that resulted from the update of the General Plan in 2000.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has amended the Zoning Ordinance to implement revisions of the General Plan concerning the Westside Freeway Corridor.</p> <p><b>Evidence of the successful implementation of Program LU-D.A during 2017:</b></p> <p>Good.</p>

**Deliverable:** In cooperation with county’s 15 cities, as appropriate, adoption of incentives/disincentives to support compact urban development and infill.

**County Reporting**

**League Reporting**

**2002 APR**

The 2002 APR provided two examples of incentives and disincentives that were introduced into the tax sharing agreement between the County and the City of Clovis in June 2002. The APR also reported a similar negotiation underway with the City of Fresno. The tax sharing agreements with the other 13 cities were to be renegotiated as they become due for renewal.

The County’s 2015, 2016 and 2017 APRs stated that the County created incentives/ disincentives to support compact urban development and infill through the adoption of its multi-jurisdictional Housing Element. The APRs also claimed that the cost of providing urban services to suburbs was a disincentive that had motivated several cities to pursue infill development over annexation of new territory. The 2015 APR stated that MOUs between the County and its cities were written to ensure that annexation of rural lands did not occur until absolutely necessary.

**2013/2014 APR**

The 2013/2014 APR did not report on this program.

It must be noted, however, that the APRs reported on the cities’ involvement in only one aspect of urban development — housing. The program was also to have addressed the locations for commercial and industrial development.

**2015 APR**

The County’s 2015 appraisal of program implementation is printed in full below:

*“The County partnered with twelve of the fifteen cities within Fresno County, including the City of Clovis, to create a multi-jurisdictional Housing Element that includes incentives and disincentives that encourage compact urban development. The MOUs between the County and the cities provide a check and balance system to ensure that development of annexed land is imminent. Also, the cost of providing urban services to suburbs is a disincentive that has motivated several cities to pursue infill development over annexation of new territory. County staff continues to refer to General Plan policies that direct intensive urban growth to the cities and unincorporated communities and reviews relevant policies when processing discretionary land use permits.”*

The County has proposed (through its December 2017 draft of the Policy Document) to amend Program LU-F.A to read that the County will shift from “adopting” to “encouraging the adoption” of incentives/ disincentives to support compact urban development and infill.

**2016 and 2017 APRs**

These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:

*“The County’s General Plan and the General Plan of the cities of Fresno and Clovis include polices that promote infill of vacant and underutilized land. Also, the cost of providing urban services to suburbs is a disincentive that has motivated several cities to pursue infill development over annexation of new territory. County staff continues to refer to General Plan policies that direct intensive urban growth to the cities and unincorporated communities and reviews relevant*

**Conclusion:**

The County has, in cooperation with county’s 15 cities, adopted incentives/disincentives to support compact urban development and infill.

**Evidence of the successful implementation of Program LU-F.A during 2017:**

Good.

		<p><i>policies when processing discretionary land use permits.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Retain time frame: Ongoing.</p>	
34	LU-F.B	<p><b>Deliverable:</b> Amendment of the Zoning Ordinance and Subdivision Ordinance to implement revisions of the General Plan concerning pedestrian and transit-oriented development.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that implementation of this program would require the adoption of new ordinances and modification of the existing Zoning Ordinance, furthermore, that a comprehensive update of the Zoning Ordinance was not included in the budget for fiscal year 2002-2003.</p> <p><b>2013/2014, 2015 and 2016 APRs</b></p> <p>These APRs stated that the program had been implemented. (The 2017 APR did not state that the program had been implemented.)</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>“The County has reviewed the Zoning Ordinance and has initiated an Ordinance Update. On October 13, 2015, the Board of Supervisors considered and approved a scope of work prepared for the General Plan Five-Year Review, Zoning Ordinance Update and the associated Environmental Impact Report. The updated Zoning Ordinance will include provisions for mixed uses and pedestrian and transit-oriented developments.”</i></p> <p><b>2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County is in the process of updating its Zoning Ordinance which will include provisions for mixed uses and pedestrian and transit-oriented developments.”</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the County was in the process of updated the Zoning Ordinance.</p> <p>Although the APRs for 2013/2014, 2015 and 2016 reported that the program had been implemented, the APRs did not address the amendment of the Subdivision Ordinance, nor did they include a discussion of the effort to implement General Plan policies regarding pedestrian and transit-oriented development.</p> <p>The use of the word “<i>will</i>” in the 2015, 2016 and 2017 APRs suggested that addressing pedestrian and transit-oriented develop was underway with the pending comprehensive update of the Zoning Ordinance.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not completed the amendment of the Zoning Ordinance and Subdivision Ordinance to implement revisions of the General Plan concerning pedestrian and transit-oriented development.</p> <p><b>Evidence of the successful implementation of Program LU-F.B during 2017:</b></p> <p>Poor.</p>



		<p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 01-02 → Ongoing.</p>	
35	LU-G.A	<p><b>Deliverable:</b> Amendment of the Zoning Ordinance, as appropriate, to facilitate moderate increases in housing density in unincorporated urban communities.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the amendment of the Zoning Ordinance to facilitate moderate increases in housing density in unincorporated community plans would take place in conjunction with the update of those community plans, the update of regional plans and the comprehensive update of the Zoning Ordinance.</p> <p><b>2013/2014, 2015 and 2016 APRs</b></p> <p>These APRs stated that the program had been implemented. (The 2017 APR did not state that the program had been implemented.)</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2015 APR contained this sentence not found in the 2016 and 2017 APRs: <i>“The update is expected to be completed in 2017 and to be presented before decision-makers.”</i> The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The County is in the process of reviewing the General Plan Policy document and updating its Zoning Ordinance. As part of the revision and update process the allowable density in the R2, R2-A, R3, R3-A, R4, C4 and RP Zone Districts is proposed to be increased to 20 units per acre.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 01-02 → Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that facilitating moderate increases in housing density in unincorporated urban communities was underway with the pending comprehensive update of the Zoning Ordinance.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not completed the amendment of the Zoning Ordinance to facilitate moderate increases in housing density in unincorporated urban communities.</p> <p><b>Evidence of the successful implementation of Program LU-G.A during 2017:</b></p> <p>Poor.</p>
36	LU-G.B	<p><b>Deliverables:</b> Review of annexation proposals submitted by the Fresno Local Agency Formation Commission (LAFCo).</p>	

Formal protest when annexations are inconsistent with either the cities' general plans or the County's General Plan.

**County Reporting**

**2002 APR**

The 2002 APR stated that up to that time all proposed annexations had been within adopted spheres of influence and had been consistent with applicable city general plans.

**2013/2014 APR**

The 2013/2014 APR did not report on this program.

**2015 APR**

The County's 2015 appraisal of program implementation is printed in full below:

*"The Department of Public Works and Planning reviews annexation proposals submitted by LAFCo to ensure consistency of the proposals with the City and County General Plans and the Memorandum of Understanding between the County and each City. A consistency determination letter is provided for each annexation proposal found to be consistent. During 2015 the County reviewed 14 annexation proposals submitted by LAFCo."*

**2016 APR**

The County's 2016 appraisal of program implementation is printed in full below:

*"The Department of Public Works and Planning reviews annexation proposals submitted by LAFCO to ensure consistency of the proposals with the City and County General Plans and the Memorandum of Understanding between the County and each City. A consistency determination letter is provided for each annexation proposal found to be consistent. During 2016 the County reviewed 10 annexation proposals submitted by LAFCO."*

**2017 APR**

The County's 2017 appraisal of program implementation is printed in full below:

*"The Department of Public Works and Planning reviews annexation proposals submitted by cities to ensure consistency of the proposals with the City and County General Plans and the Memorandum of Understanding between the County and each City. A consistency*

**League Reporting**

The 2015, 2016 and 2017 APRs stated that the County routinely reviewed annexation proposals from the Fresno Local Agency Formation Commission.

During calendar years 2015, 2016 and 2017, the County reported that it reviewed a total of 39 annexation proposals. The APRs did not state whether the County found them all to be consistent with either the cities' general plans for the County's General Plan.

The County has proposed (through its December 2017 draft of the Policy Document) to amend Program LU-G.B to read that the County will also protest an annexation proposal if it is inconsistent with the standards of annexation included in the memorandums of understanding between the County and its 15 cities.

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**Conclusion:**

The County reviews annexation proposals submitted by the Fresno Local Agency Formation Commission.

**Evidence of the successful implementation of Program LU-G.B during 2017:**

Good.

		<p><i>determination letter is provided for each annexation proposal found to be consistent. During 2017 the County reviewed 15 annexation proposals submitted by cities.</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: As Needed → Ongoing.</p>	
37	LU-H.A	<p><b>Deliverable:</b> Adoption of a Friant-Millerton Area Regional Plan consistent with directives in Policy LU-H.8.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated (1) that work had not progressed on the new regional plan for the Friant-Millerton Area and (2) that the APR contained a recommended priority list for the update of community and regional plans.</p> <p><b>2013/2014</b></p> <p>The 2013/2014 APR stated that this program was among 12 others that had been delayed <i>“for a number of reasons, including the lack of available funding.”</i></p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>The 2015, 2016 and 2017 APRs stated that the program had been suspended.</p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“This program has been suspended pending additional Board direction.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-03 → ∅</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2013/2014 APR stated that the program had not been implemented because of a lack of funding.</p> <p>The County’s 2015, 2016 and 2017 APRs stated that the program had been <i>“suspended pending additional Board direction.”</i> The APRs did not provide a date for the Board decision to suspend the program.</p> <p>(It is important to note that there has no process for <i>“suspending”</i> General Plan programs without amending the General Plan.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not adopted a Friant-Millerton Area Regional Plan consistent with directives in Policy LU-H.8.</p> <p><b>Evidence of the successful implementation of Program LU-H.A during 2017:</b></p> <p>None.</p>
38	LU-H.B	<p><b>Deliverables:</b> Regular meetings with the county’s 15 cities and adjacent counties to address planning and growth issues of common interest.</p> <p>Annual report on cooperative planning efforts of the previous year and the planned schedule of meetings for the upcoming year.</p>	



**County Reporting**

**2002 APR**

The 2002 APR stated that after the update of the General Plan in 2000, County planning focused on (1) new tax sharing agreements with the cities of Clovis and Fresno and (2) the preparation of a Regional Housing Needs Allocation, which involved all the cities and was adopted in September 2001.

**2013/2014 APR**

The 2013/2014 APR did not report on the program.

**2015, 2016 and 2017 APRs**

These APRs contained a nearly identical appraisal of the implementation of the program. One difference was that the 2016 and 2017 APRs added the underlined sentence. The appraisal from the 2016 APR is printed in full below:

*“Efforts that began in 2014 culminated into a January 27, 2015 joint meeting between the Madera County Board of Supervisors and the Fresno County Board of Supervisors at the Fresno Council of Governments (FCOG). [The meeting was actually held in the Madera County Board of Supervisors chambers.] Topics discussed at the joint meeting included development and land use vision in the Rio Mesa area and Friant Corridor, Fresno County/Madera County Highway 41 Origin-Destination Study, and the Sustainable Groundwater Management Act of 2014 (SGMA).*

*On June 22, 2015, a joint meeting between the Board of Supervisors and representatives of all 15 incorporated cities within the County was held at the FCOG. Topics discussed included SGMA, Marijuana Ordinances, land use and preservation and special districts.*

*On November 17, 2015, a joint meeting between the Board of Supervisors and the representatives from the Cities of Clovis, Fowler, Fresno and Sanger was held at the FCOG. Topics discussed included industrial parks, spheres of influence and SGMA. There are efforts underway for the Board of Supervisors and the Fresno City Council to meet periodically to discuss regional issues.”*

The 2017 APR added this statement:

*“On May 30, 2017, a joint meeting between the Board of Supervisors and representatives from the City of Fresno was held at Fresno City Hall. Topics discussed included emergency coordination/public safety,*

**League Reporting**

The County’s 2015, 2016 and 2017 APRs reported that the County held three joint meetings in 2015 and two joint meetings in 2017. These five meetings did not constitute the required regular County meetings with the county’s 15 cities.

The APRs did not provide evidence of annual reporting on cooperative planning efforts or the planned scheduling of meetings.

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**Conclusion:**

Even though the County of Fresno has met with the County of Madera and with the 15 cities within Fresno County, the County of Fresno has not schedule regular meetings with these same agencies and does not prepare an annual report on cooperative planning efforts of the previous year and the planned schedule of meetings for the upcoming year.

**Evidence of the successful implementation of Program LU-H.B during 2017:**

Poor.

		<p><i>ShotSpotter technology expansion, Marijuana Ordinances and animal control.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Ongoing → Ø</p>	
39	LU-H.C	<p><b>Deliverable:</b> Creation of a set of guidelines for updating or creating land use plans.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that a draft set of guidelines had been prepared and would be presented to the Planning Commission in conjunction with the APR.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>“The County has prepared a format and guideline for updating existing plans and preparing new regional and community plans.”</i></p> <p><b>2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County has prepared a format and guideline for new and updates to existing plans. This program has been implemented and will be deleted.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-03 → Ø</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the County had prepared a format and guideline for the preparation and update of regional and community plans.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has created a set of guidelines for updating or creating land use plans.</p> <p><b>Evidence of the successful implementation of Program LU-H.C during 2017:</b></p> <p>Good.</p>
40	LU-H.D	<p><b>Deliverable:</b> Annual report on the General Plan from the Planning Commission to the Board of Supervisors...</p> <p>(a) Focusing principally on actions undertaken in the previous year to carry out General Plan programs,</p>	

(b) Recommending, as appropriate, amendments to the General Plan and

(c) Satisfying the environmental requirements of Public Resources Code 21081.6 for a mitigation monitoring program.

### County Reporting

#### 2002 APR

The 2002 APR stated that staff had prepared an APR pursuant the Program LU-H.D.

#### 2013/2014

The 2013/2014 APR stated that this program was among 12 others that had been delayed *“for a number of reasons, including the lack of available funding.”*

The 2013/2014 APR specifically stated that APRs had not been prepared after 2002, in other words, that the County had not reported on General Plan implementation for a decade: from July 1, 2002 through December 31, 2012. (The 2013/2014 APR covered two calendar years: 2013 and 2014.)

#### 2015 APR

The County's 2015 appraisal of program implementation is printed in full below:

*“The Public Works and Planning Department presented the 2014 General Plan Annual Progress Report to the Planning Commission on February 26, 2015 and to the Board on March 24, 2015. The preparation of the Annual Report which focuses principally on actions undertaken during 2015 to carry out the implementation programs of the General Plan meets the requirements of this program and is being presented to the Planning Commission and Board of Supervisors.”*

#### 2016 APR

The County's 2016 appraisal of program implementation is printed in full below:

*“The Public Works and Planning Department presented the 2015 General Plan Annual Progress Report to the Planning Commission on July 21, 2016 and to the Board on September 12, 2016. The preparation of the Annual Report which focuses principally on actions undertaken during 2016 to carry out the implementation programs of the General Plan meets the requirements of this program and is being presented to the Planning Commission and Board of Supervisors.”*

### League Reporting

With regard to deliverable (a), the County's 2015, 2016 and 2017 APRs stated that the County's APRs for those three years focused mainly on “actions” undertaken by the County to implement General Plan programs.

With regard to deliverable (b), the County's 2015, 2016 and 2017 APRs did not contain any recommendations to amend the General Plan

With regard to deliverable (c), the County's 2015, 2016 and 2017 APRs did not satisfy the environmental requirements of Public Resources Code 21081.6 in that the County did not annually monitor the implementation of the more than 300 policies in the General Plan Policy Document that serve to mitigate adverse impacts resulting from the implementation of the General Plan.

In addition, the APRs did not satisfy subsection (C) of Government Code 65400, which required the County to annually assess the degree to which the General Plan complied with the General Plan guidelines developed by the Governor's Office of Planning and Research (OPR). The salient portions of Government Code 65400 are reproduced below.

Government Code 65400.

*“(a) After the legislative body has adopted all or part of a general plan, the planning agency shall do...the following:*

*⋮*

*(2) Provide by April 1 of each year an annual report to the legislative body, the Office of Planning and Research, and the Department of Housing and Community Development that includes all of the following:*

*⋮*

*(C) The degree to which its approved general plan complies with the guidelines developed and adopted*

		<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of program implementation is printed in full below:</p> <p><i>"The Public Works and Planning Department prepares and presents the General Plan Annual Progress Report for the previous calendar year to the Planning Commission and the Board. The preparation of the Annual Report focuses principally on actions undertaken during the previous calendar year to carry out the implementation of the General Plan."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p><i>pursuant to Section 65040.2 and the date of the last revision to the general plan."</i></p> <hr/> <p><b>Conclusion:</b></p> <p>Although the County prepares Annual Progress Reports (<b>APRs</b>) on the implementation of the General Plan, the APRs do not satisfy the environmental requirements of Public Resources Code 21081.6 for a mitigation monitoring program or Government Code 65400 for an evaluation of the degree to which the County's General Plan complies with the general plan guidelines prepared by OPR (most recently updated in 2017).</p> <p><b>Evidence of the successful implementation of Program LU-H.D during 2017:</b></p> <p>Poor.</p>
41	LU-H.E	<p><b>Deliverables:</b> Every 5 years, a major review of the General Plan, including the General Plan Background Report and Policy Document.</p> <p>Revision of the General Plan every 5 years as necessary.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for its accomplishment was fiscal year 2005-2006.</p> <p><b>2013/2014, 2015 and 2016 APRs</b></p> <p>These APRs stated that the program had been implemented. (The 2017 APR did not state the program had been implemented.)</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The differences in reporting among the three APRs are underlined.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2013/2014, 2015 and 2016 APRs stated that the program had been "implemented." (It should be noted that the County's APRs did not define the word "implemented." If "implemented" meant "initiated," then the County's statement was correct, but if it meant "completed," then the statement was incorrect.) With respect to this particular program, since the County did not complete any of the reviews scheduled for 2005, 2010 or 2015, the program cannot be considered implemented.</p> <p>In addition, it is important to note that the review begun in 2005 is no longer a 5-year review. Beginning around 2015, the County planning staff began to transform the 5-year review into a 20-year "update" of the General Plan with a new planning horizon to the year 2040. In switching from a 5-year review to a 20-year update of the General Plan, the</p>

	<p><u>“The County initiated the General Plan review in 2006 and has been working on this effort since that time.”</u></p> <p><i>On September 22, 2015 the Board of Supervisors accepted the scope of work and authorized the Chairman to execute a Consultant Agreement with the consulting firm of Mintier-Harnish to provide planning and environmental consulting services for the preparation of an Environmental Impact Report (EIR) for the <u>General Plan Five-Year Review and Comprehensive Zoning Ordinance Update.</u>”</i></p> <p><b>2016 APR</b></p> <p>The County's 2016 appraisal of program implementation is printed in full below:</p> <p><u>“The County initiated the General Plan review in 2006 and has been working on this effort ever since.”</u></p> <p><i>On September 22, 2015 the Board of Supervisors accepted the scope of work and authorized the Chairman to execute a Consultant Agreement with the consulting firm of Mintier-Harnish to provide planning and environmental consulting services for the preparation of an Environmental Impact Report (EIR) for the <u>General Plan Five-Year Review and Comprehensive Zoning Ordinance Update.</u>”</i></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of program implementation is printed in full below:</p> <p><u>“The County in [sic] currently working on the Review of the General Plan.”</u></p> <p><i>On September 22, 2015 the Board of Supervisors accepted the scope of work and authorized the Chairman to execute a Consultant Agreement with the consulting firm of Mintier-Harnish to provide planning and environmental consulting services for the preparation of an Environmental Impact Report (EIR) for the <u>General Plan Review and Comprehensive Zoning Ordinance Update.</u>”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Retain time frame: Every 5 years.</p>	<p>County, in effect, abandoned its responsibility under Program LU-H.E to conduct a 5-year review of the General Plan in favor of completing a 20-year update of the plan.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program LU-H.E to read that five-year reviews will no longer be obligatory. Below is the recommended change to Program LU-H.E:</p> <p><i>The County <del>shall</del> <b>should</b> conduct a major review of the General Plan, including General Plan Policy Document and Background Report, every five years and revise it as deemed necessary.</i></p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not completed any of the required 5-year reviews of the General Plan — those scheduled for 2005, 2010 and 2015.</p> <p><b>Evidence of the successful implementation of Program LU-H.E during 2017:</b></p> <p>None.</p>
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**Deliverable:** Comprehensive amendment of the Zoning Ordinance and Zoning Map to ensure conformity with new policies and standards in the 2000 update of the General Plan.

**County Reporting**

**League Reporting**

**2002 APR**

The 2002 APR stated that, consistent with the 2000 update of the General Plan, portions of the Zoning Ordinance had been amended to address parcel size exceptions and housing density. Furthermore, additional amendments would be processed in future years, as necessary, to implement General Plan policies.

At the time the General Plan was updated in 2000, the County recognized the need to bring the Zoning Ordinance into compliance with the new Plan. A number of programs addressed this need: LU-A.A, LU-D.A, LU-F.B, LU-G.A and LU-H.F.

**2013/2014, 2015 and 2016 APRs**

These APRs stated that the program had been implemented. (The 2017 APR did not state the program had been implemented.)

The 2002 APR indicated that additional amendments of the General Plan were needed to bring the Zoning Ordinance into complete compliance with the 2000 update of the plan.

**2015, 2016 and 2017 APRs**

These APRs contained a nearly identical appraisal of the implementation of the program. (The differences among the three APRs are underlined.)

The County's 2014, 2015, 2016 and 2017 APRs did not provide a clear account of the degree to which the County had been able to accomplish that task. Although the APRs indicated that some progress had been made and that the County was continuing to work on a comprehensive update of the Zoning Ordinance, the APRs did not provide evidence that the program had been fully implemented — i.e., that the Zoning Ordinance had been brought into complete compliance with the provisions of the 2000 General Plan.

**2015 APR**

The County's 2015 appraisal of program implementation is printed in full below:

*"The Zoning Ordinance has been amended to incorporate the policies of the 2000 General Plan Update.*

*The County initiated the Zoning Ordinance Update in 2006 and has been working on this effort since that time.*

*On September 22, 2015, the Board of Supervisors accepted the scope of work and authorized the Chairman to execute a Consultant Agreement with the consulting firm of Mintier-Harnish to provide planning and environmental consulting services for the preparation of an Environmental Impact Report (EIR) for the General Plan Five-Year Review and Comprehensive Zoning Ordinance Update."*

**Conclusion:**

While the County has made some progress in amending the Zoning Ordinance to ensure conformity with the 2000 update of the Agriculture and Land Use Element, the County's APRs did not demonstrate that the County had completed that work.

**Evidence of the successful implementation of Program LU-H.F during 2017:**

Poor.

**2016 APR**

The County's 2016 appraisal of program implementation is printed in full below:

*“The Zoning Ordinance has been amended to incorporate the policies of the 2000 General Plan Update.*

*The County initiated the Zoning Ordinance Update in 2006 and has been working on this effort since.*

*On September 22, 2015, the Board of Supervisors accepted the scope of work and authorized the Chairman to execute a Consultant Agreement with the consulting firm of Mintier-Harnish to provide planning and environmental consulting services for the preparation of an Environmental Impact Report (EIR) for the General Plan Five-Year Review and Comprehensive Zoning Ordinance Update.”*

**2017 APR**

The County's 2017 appraisal of program implementation is printed in full below:

*“The Zoning Ordinance has been amended to incorporate the policies of the 2000 General Plan Update.*

*The County is currently working on the update of the Zoning Ordinance along with the General Plan Review.*

*On September 22, 2015, the Board of Supervisors accepted the scope of work and authorized the Chairman to execute a Consultant Agreement with the consulting firm of Mintier-Harnish to provide planning and environmental consulting services for the preparation of an Environmental Impact Report (EIR) for the General Review and Comprehensive Zoning Ordinance Update.”*

**Recommendations in the Draft 2017 Policy Document**

Delete program.

Change time frame: FY 02-04 → Ø

## 2000 TRANSPORTATION AND CIRCULATION ELEMENT

43	TR-A.A	<p><b>Deliverable:</b> At least every 5 years, update of the County’s Road Improvement Program (RIP), which prioritizes operational and safety improvements, maintenance, rehabilitation and reconstruction of the road system in unincorporated Fresno County.</p>				
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">County Reporting</th> <th style="width: 50%; text-align: center;">League Reporting</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;"> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County was working on development of an update of the County’s 1997-2004 Road Improvement Program. The APR also stated that although completion was delayed due to budget constraints and vacant staff positions, a draft Road Improvement Program update was expected to be ready for Board consideration in January 2003.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 APR</b></p> <p>The County’s 2015 appraisal of program implementation is printed in full below:</p> <p><i>“On April 7, 2015, the County Board of Supervisors approved the Fresno County Road Improvement Program (RIP). The RIP identified anticipated revenues and defined the areas of road program emphasis as well as specific planned projects over a five-year period.”</i></p> <p><b>2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2016 APR contained a different date — May 24, 2016 rather than August 22, 2017. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“On August 22, 2017, the Board of Supervisors approved the Fresno County Road Improvement Program (RIP) and Declaration of Projects. The RIP is a multi-year maintenance and construction programming plan and reflects the County’s efforts to protect and improve the public investment in the County road system and to provide for the safe and efficient movement of people and commodities. The RIP identifies maintenance funding levels and specific projects expected to be delivered within a defined time frame. The funding in the RIP reflects current and projected budgets and the RIP also identifies, but does</i></p> </td> <td style="vertical-align: top;"> <p>The County’s 2017 APR stated that the on August 22, 2017, the Board of Supervisors updated its Fresno County Road Improvement Program. The period covered by that update began July 1, 2017 and will run through June 30, 2022.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program TR-A.A to read that the County will update its RIP annually.</p> <hr style="width: 20%; margin-left: auto; margin-right: 0;"/> <p><b>Conclusion:</b></p> <p>The County has updated its Road Improvement Program.</p> <p><b>Evidence of the successful implementation of Program TR-A.A during 2017:</b></p> <p>Good.</p> </td> </tr> </tbody> </table>	County Reporting	League Reporting	<p><b>2002 APR</b></p> <p>The 2002 APR stated that the County was working on development of an update of the County’s 1997-2004 Road Improvement Program. 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		<p><i>not fund, a number of recommended projects that are necessary for an improved County road and bridge system. These prospective projects are described in a series of appendices to the RIP. The types of projects in the RIP include bridge replacement/repair, road reconstruction, traffic signals, shoulder widening, and pavement repair.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: Every 5 years → Annually.</p>	
44	TR-A.B	<p><b>Deliverable:</b> Consideration of the adoption of a traffic fee ordinance to achieve the adopted level of service (LOS) and preserve the structural integrity of the County’s road system based on a twenty (20) year time horizon.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that a report identifying the basic requirements for a regional fee program had been provided to the Board for its consideration. The APR added that <i>“the lack of progress [in implementing Program TR-A.B] is principally due to the allocation of resources associated with funding and/or staffing.”</i> The APR recommended <i>“adjustment of the timeframe for adoption of a traffic impact fee ordinance, dependent upon Board direction and funding availability.”</i></p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 APR</b></p> <p>The County’s 2015 appraisal of program implementation is printed in full below:</p> <p><i>“A traffic impact fee has been adopted by the Board of Supervisors. However, on February 2, 2015, the Board of Supervisors conducted a second public hearing to consider an amendment to repeal the Public Facilities Impact Fees Ordinance in its entirety. At the conclusion of the hearing, the Board decided to continue suspension of the impact fees and directed Staff to return to the Board in two years.”</i></p> <p><b>2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2017 APR added the two underlined</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002, 2015, 2016 and 2017 APRs stated that the Board of Supervisors adopted a traffic fee ordinance.</p> <p>The County’s 2015, 2016 and 2017 APRs reported that the collection of traffic impact fees had been suspended since at least 2015.</p> <p>Since program implementation only required <i>“consideration”</i> of the adoption of a traffic fee ordinance, the program must be deemed fully implemented independent of whether or not the County actually adopted a traffic fee ordinance or implemented it.</p> <p>It is important to note that comments in the County’s 2015, 2016 and 2017 APRs regarding <i>“public facility impact fees”</i> were not germane to the directive in Program TR-A.B to consider adoption of a <i>“traffic fee ordinance.”</i></p> <hr/> <p><b>Conclusion:</b></p> <p>The County considered the adoption of a traffic fee ordinance.</p> <p><b>Evidence of the successful implementation of Program TR-A.B during 2017: G</b></p>

		<p>sentences. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“A traffic impact fee has been adopted by the Board of Supervisors. However, on May 19, 2015, the Board of Supervisors conducted a public hearing to consider an amendment to repeal the Public Facilities Impact Fees Ordinance in its entirety. At the conclusion of the hearing, the Board decided to continue suspension of the impact fees to November 9, 2017 and directed Staff to return to the Board with a workshop on the County’s Facility Impact Fees and provide options for the Board to consider. <u>On October 31, 2017, the Board of Supervisors conducted the second public hearing to consider an amendment to the County Ordinance for Public Facilities Impact Fees. At the conclusion of the hearing, the Board decided to continue suspension of the impact fees to November 10, 2018.”</u></i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 01-02 → 2021-?.</p> <p>(The question mark in the time frame above is written in place of the year because that portion of the County’s Draft 2017 Policy Document is unreadable.)</p>	<p>Good.</p>
<p>45</p>	<p>TR-A.C</p>	<p><b>Deliverable:</b> Ongoing pursuit of new funding sources for transportation improvements.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County continually monitored sources of funding applicable to the County.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County continues to pursue funding for transportation improvements in working with the Fresno Council of Governments.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County continually monitored sources of funding for transportation improves. And although the APRs provided no information to support that statement, it may be assumed that the County implemented the program to some degree.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to pursue new funding sources for transportation improvements.</p> <p><b>Evidence of the successful implementation of Program TR-A.C during 2017:</b></p>

		Retain time frame: Ongoing.	Poor.
46	TR-A.D	<b>Deliverable:</b> Coordination of transportation planning with the Fresno Local Agency Formation Commission (LAFCo), Caltrans, the cities and neighboring counties.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County participated in the following: various Fresno Council of Governments (FCOG) transportation committees, the FCOG East-West Corridor Steering Committee, the FCOG Freight Advisory Committee; the Fresno Area Regional Collaborative Land Use/Transportation Committee, Caltrans Project Development Teams, the Fresno County Transportation Authority Technical Advisory Committee, the Manning Avenue Transportation Corridor of Economic Significance Technical Support Committee, the San Joaquin River Conservancy Interagency Project Development Team and the Golden State Corridor Coalition.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“During 2017, the County continued coordinating its transportation planning with FCOG, Caltrans, Cities and adjacent jurisdictions.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p> <p>Add new Program ED-A.C, which would read as follows:</p> <p><i>“The County shall collaborate with the Fresno Council of Governments and existing food, fiber, and agricultural product processing firms to assess the current state of regional and intermodal transportation infrastructure, the needs for the future, and the role of the County and other agencies in facilitating infrastructure development.”</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County continued to coordinate transportation planning with the Fresno Local Agency Formation Commission, Caltrans, the cities and neighboring counties. And although the APRs provided no information to support that statement, it may be assumed that the County implemented the program to some degree.</p> <p>The draft 2017 General Plan Policy Document included new Program ED-A.C that would require the County to collaborate with the Fresno Council of Governments and existing food, fiber, and agricultural product processing firms to assess the current state of regional and intermodal transportation infrastructure, the needs for the future, and the role of the County and other agencies in facilitating infrastructure development.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to coordinate transportation planning with the Fresno Local Agency Formation Commission, Caltrans, the cities and neighboring counties.</p> <p><b>Evidence of the successful implementation of Program TR-A.D during 2017:</b></p> <p>Poor.</p>

47	TR-A.E	<b>Deliverable:</b> Update of County Improvement Standards for County development improvements, including private roads dedicated to public use.	
	<b>County Reporting</b>	<b>League Reporting</b>	
		<p><b>2002 APR</b></p> <p>The 2002 APR stated that the County was drafting revised improvement standards to update its 1966 document and that it was anticipated that a draft document would be circulated in fiscal year 2002-2003.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County implements this program/policy on a continuous basis. The County is currently working on updating the County’s Improvement Standards.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p> <p>Add new Program TR-A.F, which would read as follows:</p> <p><i>“The County shall prepare Complete Streets Design Guidelines and update the them [sic] every five years.”</i></p>	<p>The County’s 2002, 2015, 2016 and 2017 APRs stated that the County was in the process of updating the County’s Improvement Standards. The APRs provided no information to support that statement, and they provided no information as to when an update might be completed.</p> <p>The draft 2017 General Plan Policy Document included new Program TR-A.F that would require the County to prepare “complete streets design guidelines” and update them every five years.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to update County Improvement Standards for County development improvements, including private roads dedicated to public use.</p> <p><b>Evidence of the successful implementation of Program TR-A.D during 2017:</b></p> <p>Poor.</p>
48	TR-B.A	<b>Deliverable:</b> In cooperation with the Fresno Council of Governments (FCOG) and at least as often as required by law, periodic update of short-range transit plans.	
	<b>County Reporting</b>	<b>League Reporting</b>	
		<p><b>2002 APR</b></p> <p>The 2002 APR stated that a Short-Range Transit Plan for the Fresno-Clovis Urbanized Area was adopted by the Fresno Council of Governments in 2001 and that a Short-Range Transit Plan for the Rural Area (outside of the Fresno/Clovis Metropolitan Area) was adopted by FCOG in 2002. The APR also stated that implementation of the program had been completed</p>	<p>The County’s 2002, 2015, 2016 and 2017 APRs stated that short-range rural transit plans were periodically updated by the Fresno Council of Governments. The last update of the short-range rural transit plan was June 25, 2015 to serve the four-year period from 2016 – 2020.</p>

		<p>and that the next update of these plans would occur in fiscal year 2006-2007.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015 APR</b></p> <p>The County's 2015 appraisal of program implementation is printed in full below:</p> <p><i>"The County implements this policy on a continuous basis. The Short-Range Transit Plan for the Rural Fresno County Area 2016-2020 was adopted by the Fresno COG on June 25, 2015."</i></p> <p><b>2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"The County works with FCOG on review and update of the Short-Range Transit Plan on a continuous basis. The Short-Range Transit Plan for the Rural Fresno County Area was last approved by the FCOG Policy board on June 25, 2015. FCOG staff is working on the plan that will be presented to the FCOG Policy Board for consideration in June of 2017."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Time frame change: Every 5 years → Ongoing.</p>	<p><b>Conclusion:</b></p> <p>The County's short-range transit plans have been updated.</p> <p><b>Evidence of the successful implementation of Program TR-B.A during 2017:</b></p> <p>Good.</p>
49	TR-B.B	<p><b>Deliverable:</b> Encouragement of transit providers and the Fresno Council of Governments (FCOG) to prepare, adopt, implement and update (on a regular basis) a long-range strategic transit master plan for the county or for subareas of the county.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that an update to the Fresno Area Express Transit Long-Range Master Plan was completed and accepted by the Fresno Council of Governments (<b>FCOG</b>) in 2002.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>To fully implement the program, the County was required only to "encourage" the preparation, adoption, implementation and update of a Fresno Area Express Transit Long-Range Master Plan.</p> <p>The County's 2002, 2015, 2016 and 2017 APRs stated that long-range transit plans</p>



		<p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The Fresno-Clovis Metropolitan Area Public Transportation Strategic Service Evaluation project was completed by FCOG on May 28, 2014. FCOG continues to prepare, adopt, and implement long-range strategic transit master plans for the County or sub-areas of the County.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p>were periodically updated by the Fresno Council of Governments.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has encouraged transit providers and the Fresno Council of Governments to prepare, adopt, implement and update a long-range strategic transit master plan for the county and for subareas of the county.</p> <p><b>Evidence of the successful implementation of Program TR-B.B during 2017:</b></p> <p>Good.</p>
50	TR-B.C	<p><b>Deliverable:</b> Pursuit of transit funding through the Fresno Council of Governments (FCOG) and the Fresno County Rural Transit Agency.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that program implementation was ongoing.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Fresno County continues to work with FCOG to identify and pursue funding for transit.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County continued to work with FCOG to identify and pursue funding for transit. And although the APRs provided no information to support that statement, it may be assumed that the County implemented the program to some degree.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to pursue transit funding through the Fresno Council of Governments and the Fresno County Rural Transit Agency.</p> <p><b>Evidence of the successful implementation of Program TR-B.C during 2017:</b></p> <p>Poor.</p>

51	TR-B.D	<p><b>Deliverables:</b> With assistance of the Fresno Council of Governments (FCOG) and other agencies, identification of rail right-of-way needs in designated transit corridors.</p> <p>Acquisition of needed rights-of-way.</p>	
	<p><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the preservation of existing transportation corridors designated for potential mass transit use would be evaluated and pursued cooperatively with other agencies as opportunities arose.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Fresno County continues to work with FCOG to identify right-of-way needs within designated transit corridors and to acquire needed rights-of-way, including abandoned rights-of-way and track structures.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County continued to work with FCOG to identify rail right-of-way needs within designated corridors and to acquire needed rights-of-way. And although the APRs provided no information to support that statement, it may be assumed that the County implemented the program to some degree.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to identify rail right-of-way needs in designated transit corridors.</p> <p><b>Evidence of the successful implementation of Program TR-B.D during 2017:</b></p> <p>Poor.</p>	
52	TR-B.E	<p><b>Deliverable:</b> In cooperation with the county’s 15 cities, preparation and adoption of land use and design standards that promote transit accessibility and use within designated urban transit corridors.</p>	
	<p><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that there had been no activity to date.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p>	<p><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that FCOG prepared a funding study to be adopted by the County and the 15 cities in order to shape growth that supports transit investments.</p> <p>The APRs provided no evidence that the County had actually adopted land use and design standards (based on a Public Transportation Infrastructure Study) to</p>	

		<p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“In 2011, FCOG prepared the Public Transportation Infrastructure Study (PTIS). The PTIS Study makes recommendations for investments, the timing of those investments, and funding sources augmenting Measure C sales tax revenue to pay for them. In addition, the PTIS study makes policy recommendations that will be important to be adopted by City- and County-elected officials and implemented by planning department and public works administrators in order to shape future growth in such a way that it supports the transit investments. Fresno County continues to work with FCOG to promote transit accessibility and use.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 01-02 → 2018-?.</p> <p>(The question mark in the time frame above is written in place of the year because that portion of the County’s Draft 2017 Policy Document is unreadable.)</p>	<p>promote transit accessibility and use within designated urban transit corridors.</p> <hr/> <p><b>Conclusion:</b></p> <p>There was no indication in the APRs that County adopted land use and design standards that promote transit accessibility and use within designated urban transit corridors.</p> <p><b>Evidence of the successful implementation of Program TR-B.E during 2017:</b></p> <p>None.</p>
53	TR-B.F	<p><b>Deliverable:</b> In cooperation with the California Department of Transportation (Caltrans), identify the need for and location of additional or expanded park-and-ride lots.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County continued to work with Caltrans and the Fresno Council of Governments through its transportation planning processes to identify regional needs for Park and Ride lots and to work with various agencies on appropriate locations and funding.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Caltrans is the primary provider of Park and Ride lots on State highways. Fresno County continues to work with Caltrans and FCOG to determine the need for</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002, 2015, 2016 and 2017 APRs stated that the County continued to work with Caltrans to identify the need for and location of additional or expanded park-and-ride lots. And although the APRs provided no information to support that statement, it may be assumed that the County implemented the program to some degree.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to identify the need for and location of additional or expanded park-and-ride lots.</p>

		<p><i>additional or expanded park-and-ride lots and to identify additional sites for such lots.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p><b>Evidence of the successful implementation of Program TR-B.F during 2017:</b></p> <p>Poor.</p>
54	TR-D.A	<p><b>Deliverable:</b> In cooperation with the Fresno Council of Governments (FCOG), the county’s 15 cities and the California Department of Transportation (Caltrans), update of the County’s Regional Bikeways Plan to ensure conformity with the Circulation Diagram and Standards section of the 2000 update of the General Plan.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the program had been completed, that the County’s Regional Bikeways Plan had been updated as part of the Regional Transportation Plan adopted by the Council of Governments on November 29, 2001. The APR stated that the Regional Bikeways Plan was consistent with the County’s Rural Bikeways Plan.</p> <p><b>2013/2014 APR</b></p> <p>Based on the fact that the County had adopted a Regional Bicycle and Recreational Trails Master Plan, the 2013/2014 APR stated that the program had been implemented and was no longer needed.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The Regional Bikeways Plan was updated as part of the non-motorized section of the Regional Transportation Plan that was last updated by FCOG on June 26, 2014. The Regional Bikeways Plan is consistent with the Fresno County Regional Bicycle and Recreational Trails Master Plan that was adopted by the Board of Supervisors on September 24, 2013.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 00-01 → Ø</p> <p>Add new Program TR-D.E, which would read as follows:</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County adopted a Regional Bicycle and Recreational Trails Master Plan in 2013 and that the Fresno Council of Government’s 2014 Regional Bikeways Plan was consistent with the County’s 2013 plan.</p> <p>(It should be noted that the 2015, 2016 and 2017 APRs did not state that the County’s 2013 plan was prepared in cooperation with FCOG, the county’s 15 cities and the California Department of Transportation.)</p> <p>The draft 2017 General Plan Policy Document included new Program TR-D.E which would allow the County to independently update its Regional Bicycle and Recreational Trails Master Plan, i.e., without having to work with the Fresno Council of Governments, the county’s 15 cities or the California Department of Transportation. (New Program TR-D.E would replace existing Program TR-D.A.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The County’s Regional Bikeways Plan has been updated.</p> <p><b>Evidence of the successful implementation of Program TR-D.A during 2017:</b></p> <p>Good.</p>

		<i>"The County shall periodically review and update the Regional Bicycle and Recreational Trails Master Plan."</i>	
55	TR-D.B	<b>Deliverable:</b> Ongoing encouragement of the use of bikeways and an active search for funding for their implementation and maintenance.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the program was ongoing, for example, that the County was developing a draft Bicycle Transportation Plan to meet the eligibility requirements for competitive State Bicycle Lane Account funds. The APR stated that the plan was expected to be presented to the Board in 2003.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>"The County continues to encourage implementation and use of bikeways by implementing the goals and policies of the Fresno County Regional Bicycle and Recreational Trails Master Plan that was adopted by the Board of Supervisors on September 24, 2013."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The 2015, 2016 and 2017 APRs stated that the County continued to encourage implementation and use of bikeways by implementing the goals and policies of the Fresno County Regional Bicycle and Recreational Trails Master Plan. The APRs provided no information to support that statement or the requirement that the County actively engage in a search for funding to implement and maintain bikeways.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program TR-D.B to eliminate the requirement that the County encourage maintenance and use of bikeways through the use of Transportation Development Act Article III funding.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to encourage the use of bikeways and actively search for funding for their implementation and maintenance.</p> <p><b>Evidence of the successful implementation of Program TR-D.B during 2017:</b></p> <p>Poor.</p>
56	TR-D.C	<b>Deliverable:</b> Evidence that road construction projects are designed to incorporate bikeways.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that, where applicable, the County was including the provision for bikeway signing</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the County required sufficient</p>

		<p>and striping as conditions of approval on new development projects.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The County requires sufficient pavement width for bikeways shown on the Fresno County Regional Bicycle and Recreational Trails Master Plan that was adopted by the Board of Supervisors on September 24, 2013.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p>pavement width for bikeways shown on the Fresno County Regional Bicycle and Recreational Trails Master Plan.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County’s road construction projects are designed to incorporate bikeways.</p> <p><b>Evidence of the successful implementation of Program TR-D.C during 2017:</b></p> <p>Good.</p>
57	TR-D.D	<p><b>Deliverable:</b> Use of California Department of Transportation (Caltrans) standards for the construction of bike facilities.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County continued to implement the program, that Caltrans standards for bikeways had been adopted for the Friant Road and Academy Avenue projects.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The Fresno County Regional Bicycle and Recreational Trails Master Plan that was adopted by the Board of Supervisors on September 24, 2013, specifies California Department of Transportation (Caltrans) bikeway design standards as guidelines for the construction of Class I, II, III bicycle facilities.”</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County had adopted Caltrans’ bikeway design standards as guidelines for the construction of Class I, II, III bicycle facilities.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program TR-D.D to read that the County will use design standards provided by the American Association of State Highway and Transportation Officials rather than those provided by Caltrans.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County uses California Department of Transportation standards for the construction of bike facilities.</p>

		<p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Retain time frame: Ongoing.</p>	<p><b>Evidence of the successful implementation of Program TR-D.D during 2017:</b></p> <p>Good.</p>
58	TR-D.E	<p><b>Deliverable</b> In cooperation with other agencies, work to provide facilities that help link bicycle use with other modes of transportation, including the provision of bike racks or space on buses and parking or lockers for bicycles at transportation terminals.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that implementation of this program was ongoing, for example, that both Fresno Area Express (FAX) and the Fresno County Rural Transit Agency outfitted buses with bicycle racks.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The Fresno County Regional Bicycle and Recreational Trails Master Plan that was adopted by the Board of Supervisors on September 24, 2013, provides information on facilities that help link bicycle riders to other modes, including the provision of bike racks or space on buses and parking or lockers for bicycles at transportation terminals.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>As stated in the County's 2015, 2016 and 2017 APRs, the County approved a 2013 Regional Bicycle and Recreational Trails Master Plan which contained policies promoting the provision of bike racks or space on buses, as well as bike parking areas. Although the APRs provided no information that the County was actively providing facilities to help link bicycle use with other modes of transportation, it may be assumed that the County implemented the program to some degree.</p> <p>(It should be noted that the 2013 Master Plan expressly stated that the Fresno County Rural Transit Agency did not offer bicycle parking facilities at its transit stops or park-and-ride lots and that the County did not envision the need for the installation of lockers.)</p> <hr/> <p><b>Conclusion:</b></p> <p>While the County has adopted a Regional Bicycle and Recreational Trails Master Plan that contains information on facilities that help link bicycle riders to other modes of transportation, information in the APRs is insufficient to understand the extent to which the County has been able to provide such facilities.</p> <p><b>Evidence of the successful implementation of Program TR-D.E during 2017:</b></p> <p>Poor.</p>

59	TR-E.A	<b>Deliverable:</b> In cooperation with other agencies, preserve railroad rights-of-way for future rail expansion or other transportation facilities.	
	<b>County Reporting</b>  <b>2002 APR</b>  The 2002 APR stated that no action had been taken, that preservation of at-risk rail corridors for transportation purposes would be evaluated and pursued cooperatively with other agencies as opportunities arose.  <b>2013/2014 APR</b>  The 2013/2014 APR did not report on this program.  <b>2015, 2016 and 2017 APRs</b>  These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:  <i>“The County continues to work with other agencies including the California High Speed Rail Authority for rail expansion to facilitate the railroad rights-of-way for railroads and other transportation facilities.”</i>  <b>Recommendations in the Draft 2017 Policy Document</b>  Modify program.  Retain time frame: Ongoing.	<b>League Reporting</b>  The County’s 2015, 2016 and 2017 APRs stated that the County continued to work with other agencies to facilitate railroad rights-of-way for future rail expansion or other transportation facilities. And although the APRs provided no information to support that statement, it may be assumed that the County implemented the program to some degree.  (It should be noted that the APRs did not address the “ <i>preservation</i> ” of existing railroad rights-of-way.)  The County has proposed (through its December 2017 draft of the Policy Document) to amend Program TR-E.A by adding the requirement from TR-E.B that the County use appropriate zoning to preserve railroad rights-of-way for future rail expansion or other transportation facilities.  <hr/> <b>Conclusion:</b>  Information provided by the County is insufficient to understand the extent to which the County has been able to preserve railroad rights-of-way for future rail expansion or other transportation facilities.  <b>Evidence of the successful implementation of Program TR-E.A during 2017:</b>  Poor.	
60	TR-E.B	<b>Deliverable:</b> Evidence of the use of appropriate zoning in designated rail corridors to ensure preservation of rail facilities for future rail use.	
	<b>County Reporting</b>  <b>2002 APR</b>  The 2002 APR stated that the only activity related to designated rail corridors during the reporting period was	<b>League Reporting</b>  The County’s 2015, 2016 and 2017 APRs stated that the County continued to use	



		<p>the groundwork laid for the Golden State Corridor study, which would include Union Pacific representatives.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County continues to use appropriate zoning classifications in designated rail corridors.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Ongoing → ∅</p>	<p>appropriate zoning in designated rail corridors to ensure preservation of rail facilities for future rail use. And although the APRs provided no information to support that statement, it may be assumed that the County implemented the program to some degree.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to combine the requirements of Programs TR-E.A (preservation of railroad rights-of-way in cooperation with other agencies) and TR- E.B (use of appropriate zoning to preserve railroad rights-of-way) by folding the requirements of Program TR-E.B into Program TR-E.A.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to use appropriate zoning in designated rail corridors to ensure preservation of rail facilities for future rail use.</p> <p><b>Evidence of the successful implementation of Program TR-E.B during 2017:</b></p> <p>Poor.</p>
61	TR-E.C	<p><b>Deliverable:</b> Participation on the Fresno Council of Governments (FCOG) Rail Committee.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the program was ongoing, that the County had official representation on the COG Rail Committee.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The FCOG Rail Committee was dissolved in 2012 when the San Joaquin Valley Joint Powers Authority</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County had representation on the San Joaquin Valley Joint Powers Authority, which supplanted the San Joaquin Valley Rail Committee.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County is a participant in the San Joaquin Valley Joint Powers Authority, formerly known as the Fresno Council of Governments Rail Committee.</p>

	<p>(SJVJPA) was formed. A Board of Supervisors member represents Fresno County by participating in the SJVJPA.”</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p><b>Evidence of the successful implementation of Program TR-E.C during 2017:</b></p> <p>Good.</p>
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## 2000 PUBLIC FACILITIES AND SERVICES ELEMENT

<b>62</b>	<b>PF-A.A</b>	<p><b>Deliverable:</b> Evidence that infrastructure plans or area facility plans are prepared in conjunction with any new or expanded community or specific plans.</p>	
		<p><b>County Reporting</b></p>	<p><b>League Reporting</b></p>
		<p><b>2002 APR</b></p> <p>The 2002 APR stated that an analysis of infrastructure improvements would be performed whenever specific plan amendments or updates were required.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Where specific plan amendments or updates are required as part of a proposed development project, analysis is performed on the adequacy of existing plans to ensure adequacy of infrastructure to accommodate the proposed development.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Annually → Ø</p>	<p>The County’s 2015, 2016 and 2017 APRs stated that the County conducted an analysis of the adequacy of the existing infrastructure for specific plans whenever they were amended.</p> <p>(It should be noted that the 2015, 2016 and 2017 APRs did not reference any new or expanded community plans. It may be assumed, therefore, that no amendments of community or specific plans occurred during those three years.)</p> <p>(It should also be noted that the County has provided no justification for the recommended deletion of Program PF-A.A.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Infrastructure plans or area facility plans are prepared in conjunction with any new or expanded community or specific plans.</p> <p><b>Evidence of the successful implementation of Program PF-A.A during 2017:</b></p> <p>Good.</p>

**Deliverables:** Adoption of a Capital Improvement Program (CIP) for the design and construction of County facilities.

At least every 5 years or concurrent with the approval of a significant amendment of the General Plan, update of the CIP.

### County Reporting

#### 2002 APR

The 2002 APR stated that the County's Five-Year Capital Improvement Plan for County facilities was approved by the Board of Supervisors in November 2000 and had been modified on several occasions since then to include updates of facilities and financing plans.

The APR also stated that County staff from the General Services Department and the County Administrative Office was in the process of crafting a Facilities Master Plan that would be used to develop a new Five-Year Capital Improvement Plan for County facilities.

#### 2013/2014 APR

The 2013/2014 APR did not report on this program.

#### 2015, 2016 and 2017 APRs

These APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2017 APR added the two underlined sentences. The appraisal from the 2017 APR is printed in full below:

*"The CIP was last updated in 2006. However, updates of the CIP have been suspended by the Board with the suspension of impact fees until November 9, 2017 based on Board action which occurred on February 2, 2015. On October 31, 2017, the Board of Supervisors conducted the second public hearing to consider an amendment to the County Ordinance for Public Facilities Impact Fees. At the conclusion of the hearing, the Board decided to continue suspension of the impact fees to November 10, 2018."*

#### Recommendations in the Draft 2017 Policy Document

Delete program.

Change time frame: FY 01-02 → ∅

### League Reporting

The County's 2017 APR stated that the last update of the County's Capital Improvement Plan was in 2006 and that the Board of Supervisors suspended further updates of the CIP. The suspension of the collection of public facilities impact fees began November 10, 2010. (See the League report for Program PF-B.B.)

On October 9, 2018, the Board voted not to "suspend" but to "discontinue" the collection of the public facilities impact fees until a new Public Facilities Impact Report is prepared.

(It is important to note that there is no process for "suspending" or "discontinuing" General Plan programs without amending the General Plan.)

#### Conclusion:

Although the County adopted a Capital Improvement Program in 2006, further updates are on hold until such time as the Board of Supervisors reauthorizes the collection of facilities impact fees.

#### Evidence of the successful implementation of Program PF-B.A during 2017:

None.

**Deliverable:** Adoption of ordinances specifying methods for new development to pay for new capital facilities and expanded services.

### County Reporting

#### 2002 APR

The 2002 APR stated that work on this program would proceed after the Facilities Master Plan and new Five-Year Capital Improvement Plan were adopted. The APR added that *“the lack of progress is principally due to the allocation of resources associated with funding and/or staffing.”* The APR recommended *“adjustment of the timeframe, dependent upon funding available.”*

#### 2013/2014 APR

The 2013/2014 APR did not report on this program.

#### 2015, 2016 and 2017 APRs

These APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2017 APR added the two underlined sentences. The appraisal from the 2017 APR is printed in full below:

*“On October 8, 2013, the Board of Supervisors considered potential options to the County’s Public Facilities Impact Fee Ordinance and Schedule of Fees and associated Capital Improvement Plan (CIP) and any other actions related to the previously collected, unspent fees, and budgetary impacts resulting from those actions. The potential options included: 1) Continue the temporary suspension of collecting Public Facilities Impact (PFI) Fees through November 9, 2015, as approved by the Board on June 19, 2012; 2) Engage a consultant to prepare an updated PFI Fee Report and direct staff to prepare an associated CIP; 3) Engage with the consultant to study and prepare a report to reduce the number of categories and areas they serve; and, 4) Adopt an ordinance repealing the PFI and adopt a resolution to terminate the associated CIP and refund fees collected to the property owners of record. On February 2, 2015, the Board of Supervisors conducted a second public hearing to consider an amendment to repeal the Public Facilities Impact Fees Ordinance in its entirety. At the conclusion of the hearing, the Board decided to continue suspension of the impact fees until November 9, 2017 and directed Staff to return to the Board in two years.”*

#### Recommendations in the Draft 2017 Policy Document

### League Reporting

The County’s 2002 APR stated that a lack of progress was principally due to a lack of funding and/or staffing.

According to various staff reports to the Board of Supervisors, as well as Board meeting minutes, the Board adopted Ordinance 17.90 (Public Facilities Impact Fees) on July 22, 2008, and the fees became effective 60 days later on September 20, 2008.

The Board subsequently amended the ordinance four times to provide successive suspensions of the collection of fees from November 10, 2010 through November 10, 2018.

On October 9, 2018 the Board voted to discontinue the collection of public facilities impact fees established in 2008 by amending Zoning Ordinance Title 17 - Divisions of Land, Chapter 17.90.

(It is important to note that while the Board of Supervisors can delete a particular program through the amendment of the General Plan, it cannot “discontinue” a program through the amendment of the Ordinance Code.)

#### Conclusion:

Although in 2008 the County adopted an ordinance in accordance with the requirements of Program PF-B.B specifying methods for new development to pay for new capital facilities and expanded services, in 2010 the Board of Supervisors suspended collection of the required fees.

#### Evidence of the successful implementation of Program BF-B.B during 2017:

None.

		<p>Delete program.</p> <p>Change time frame: FY 01-03 → Ø</p>	
65	PF-C.A	<p><b>Deliverable:</b> Development of a process to resolve water supply problems when areas of need are identified.</p>	
<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that “<i>no progress</i>” had been made and recommended that the target date for implementation be extended from fiscal year 2002-2003 to fiscal year 2005-2006. The APR added that “<i>the lack of progress is principally due to the allocation of resources associated with funding and/or staffing.</i>”</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2017 APR added the underlined sentence. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The Water and Natural Resources Division of the Department of Public Works and Planning reviews all discretionary permits and provides recommendation for requirements and mitigation measures as necessary. The County, prior to consideration of any discretionary project related to land use, requires a water supply evaluation as outlined in General Plan Policy PF-C.17. In addition, the County is currently working to implement the requirements of the Sustainable Groundwater Management Act (SGMA) which will further address the resolution of water supply problems. In 2015, six SGMA working group meetings were held, which were co-chaired by members of the Board of Supervisors. The working group is also comprised of key County and Irrigation District staff and includes representation from other interested and affected Communities. In 2017, the Department of Public Works and Planning worked collaboratively with other local agencies in completing phase one of four that are required by the SGMA regulations, resulting in the formation of multiple GSAs located within Fresno County, with two exclusively managed by the County, Fresno County Management Areas A and B.”</i></p>		<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002 APR stated that a lack of progress was principally due to a lack of funding and/or staffing.</p> <p>The 2015, 2016 and 2017 APRs stated that the County reviewed the water supply requirements for new development projects and that the County was working to implement the Sustainable Groundwater Management Act of 2014.</p> <p>The APRs provided no evidence that the County had developed a process to resolve water supply problems when areas of need were identified.</p> <p>It’s important to note that from December 2011 to March 2017, the State of California experienced one of the worst droughts on record. In fact, the three-year period between late 2011 and 2014 was the driest in California history since record-keeping began. The impact on agricultural operations and rural residents was significant.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program PF-C.A to read that in an effort to identify and implement projects and programs to improve water supply reliability and water quality, the County will participate in an Inter-Regional Water Management Plan rather than develop its own process for resolving water supply problems.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not developed a process to resolve water supply problems, nor has it identified any need to do so.</p>	

		<p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: FY 01-02 → Ongoing.</p>	<p><b>Evidence of the successful implementation of Program PF-C.A during 2017:</b></p> <p>None.</p>
66	PF-C.B	<p><b>Deliverable:</b> Adoption of a well construction/deconstruction ordinance.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County had acquired the field instrumentation necessary to plot water well sites and log them into the County's water well database. The APR also stated that existing Zoning Ordinance chapters addressing well construction and destruction would be evaluated and updated as necessary.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"The County Environmental Health Division has developed a procedure to ensure the abandoned wells are properly destroyed."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-03 → None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the County's Environmental Health Division had developed a procedure to ensure that abandoned wells were properly destroyed.</p> <p>(It should be noted that the County's APRs did not state that the County had adopted a well construction/deconstruction ordinance, nor did they identify the procedures used by the County to ensure that abandoned wells were properly destroyed. That said, County Ordinance Code 14.08.130 through 14.08.170 (1974) does address the construction and destruction of water wells.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to determine if the County adopted a well construction/deconstruction ordinance after the update of the General Plan in 2000.</p> <p><b>Evidence of the successful implementation of Program PF-C.B during 2017:</b></p> <p>Poor.</p>
67	PF-C.C	<p><b>Deliverable:</b> Preparation of water master plans for water delivery systems for areas undergoing urban growth.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that updates of water master plans and implementation schedules were required for areas experiencing urban-type growth, such as the</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the County was required to update existing water master plans and</p>

		<p>Millerton New Town area and the Shaver Lake area. The APR also stated that the Water, Geology and Natural Resources Section of the Planning Department was responsible for area-wide water plans but that no progress had been made in the development of those plans.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Updates of water master plans and implementation schedules are required for areas experiencing urban-type growth. Millerton Specific Plan area, Shaver Lake area and Friant Specific Plan area have approved plans. As an example, in 2010, a Water Supply Assessment was completed for the Millerton Specific Plan as part of the approval process for Tentative Tract Map No. 5430.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: As needed → Ongoing.</p>	<p>implementation schedules for areas of the county experiencing urban growth. Even so, the APRs did not comment on whether the County had completed an inventory of the areas in need of such plans, such as the area along Interstate 5 corridor where the County’s 2016 Economic Development Strategy indicated the need to <i>“develop water and related infrastructure services that can help attract new commercial and services uses that cater to highway travelers at key interchanges along Interstate.”</i></p> <p>Also not mentioned in the APRs was the requirement to prepare a regional plan for the Friant-Millerton area that would include a plan for groundwater and surface water availability. According to General Plan Policy LU-H.8, that area was the <i>“county’s largest remaining area without productive agricultural soils near the Fresno-Clovis Metropolitan Area”</i> that <i>“may be suitable for urban development.”</i></p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program PF-C.C to read that the County will shift its focus from preparing water master plans for areas undergoing urban growth to working with service providers to provide such plans for new development proposed for unincorporated communities.</p> <hr/> <p><b>Conclusion:</b></p> <p>While the County has prepared water master plans for acreage within certain specific plans, there is no indication that the County has prepared water master plans for other areas undergoing growth pressures, such as the area along the I-5 corridor or the area within the boundary of the pending Friant-Millerton Regional Plan. (See Program LU-H.A and Policy LU-H.8.)</p> <p><b>Evidence of the successful implementation of Program PF-C.C during 2017:</b></p> <p>Poor.</p>
68	PF-C.D	<b>Deliverable:</b> Creation of tiered water pricing structures for CSAs and waterworks districts.	

		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that tiered water rate structures had been implemented for some County Services Areas (CSAs) and that the County was in the process of selecting a consultant to develop tiered water pricing for other CSAs.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that the program had been implemented.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs also stated that the program had been implemented.</p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Tiered water rate structures have been implemented in recent developments. Due to recent drought conditions, CSA and WWD water rate structures are being modified to a flat rate (operational costs) plus a consumption rate (cost of water). Tiered consumption rates are being utilized in CSAs and WWDs where the supply or treatment of water is limited. All new developments are required to provide water rate structures prepared by an engineer and comprised of a flat rate and consumption rate.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 02-03 → 2021-?. (The question mark in the time frame above is written in place of the year because that portion of the County’s Draft 2017 Policy Document is unreadable.)</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that tiered water pricing or a flat rate plus consumption rate (cost of water) had been implemented for most if not all County Service Areas (<b>CSAs</b>) and County water districts.</p> <p>(It should be noted that even though the County’s 2013/2014, 2015 and 2016 APRs stated that the Program PF-C.D had been implemented, the County has proposed through its December 2017 draft of the Policy Document to amend the time frame for accomplishing Program PF-C.D from FY 02-03 to calendar year 2021 or beyond.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Tiered water pricing structures for CSAs and waterworks districts have been created.</p> <p><b>Evidence of the successful implementation of Program PF-C.D during 2017:</b></p> <p>Good.</p>
69	PF-C.E	<p><b>Deliverable:</b> Establishment of water demand standards for new development.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that water demand standards were currently under review.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that specific water demand standards for new development had not been</p>



		<p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Although specific standards have not been established, water supply and proposed water use are evaluated on a per-project basis by Public Works and Planning staff to determine adequate water supply. Further, in regards to landscaping, the County is implementing the State required Model Water Efficient Landscape Ordinance which applies to both residential and commercial projects. The MWELO was part of the Governor’s Drought Executive Order of April 1, 2015. The revised ordinance was approved on July 15, 2015.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 01-02 → Ø</p> <p>Add new Program PF-C.E, which would read as follows:</p> <p><i>“The County shall adopt cost-effective urban best water conservation management practices, consistent with the intent of the California Urban Water Agencies, advisories, California Department of Water Resources, or similar authoritative agencies or organizations.”</i></p>	<p>established. The APRs stated that water supply and water use were evaluated on a per-project basis.</p> <p>The draft 2017 General Plan Policy Document included new Program PF-C.E which would require the County to adopt cost-effective urban best water conservation management practices.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not established water demand standards for new development.</p> <p><b>Evidence of the successful implementation of Program PF-C.E during 2017:</b></p> <p>None.</p>
70	PF-C.F	<p><b>Deliverable:</b> Establishment of a review and/or regulatory process for...</p> <p>(a) Transfer of surface water out of the county and</p> <p>(b) Substitution of groundwater for transferred surface water.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that this program was completed in 2000 with the adoption of the Groundwater Transfer Ordinance.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002, 2015, 2016 and 2017 APRs stated that the County adopted a Groundwater Transfer Ordinance in 2000.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has established a regulatory process for the transfer or surface water out</p>

		<p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“This program has been implemented with the adoption of the Groundwater Transfer Ordinance and should be deleted.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 00-01 → Ø</p>	<p>of the county and for the substitution of groundwater for transferred surface water.</p> <p><b>Evidence of the successful implementation of Program PF-C.F during 2017:</b></p> <p>Good.</p>
71	PF-C.G	<p><b>Deliverable:</b> Development and periodic update of a list of technologies and methods to maximize the use of water resources.</p>	
<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the development of a list of water conservation technologies, methods and practices was planned for the last half of fiscal year 2002-2003.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County enforces the State Model Water Efficient Landscape Ordinance as a means to promote the values and benefits of landscapes while recognizing the need to invest water and other resources as efficiently as possible, to establish a structure for planning, designing, installing maintaining and managing water efficient landscapes in new and rehabilitated projects, to establish provisions for water management practices and water waste prevention for established landscapes, and to use water efficiently without waste by setting a Maximum Applied Water Allowance (MAWA) as an upper limit for water use and reduce water use to the lowest practical amount. These standards are enforced for any residential, commercial, or industrial projects that require a permit, plan check or design review and that have a 500 square feet or more landscaping area.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p>		<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County was enforcing the state’s water use standards for landscaping.</p> <p>The APRs did not, however, state that the County had developed a list of technologies and methods to maximize the use of water resources.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program PF-C.G to read that the County will prepare a Water Conservation Ordinance that includes water conservation technologies, methods, and practices to maximize the beneficial use of water resources — which suggests that the County does not currently have such a list.</p> <p>Through its December 2017 draft of the Policy Document, the County has also proposed new Program PF-C.E, which will require the County to adopt cost-effective urban best water conservation management practices.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information from various County documents indicates that the County has not developed a</p>	

		<p>Modify program.</p> <p>Change time frame: FY 01-02 → 2018 -? and Ongoing. (The question mark in the time frame above is written in place of the year because that portion of the County's Draft 2017 Policy Document is unreadable.)</p>	<p>list of technologies and methods to maximize the use of water resources.</p> <p><b>Evidence of the successful implementation of Program PF-C.G during 2017:</b></p> <p>None.</p>
72	PF-D.A	<p><b>Deliverable:</b> Creation of sewer master plans for sewer treatment facilities for areas undergoing urban growth.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that updates of sewer master plans were required for areas experiencing urban-type growth. The APR also stated that areas of concern included the Millerton New Town area and Shaver Lake area, which had previously approved plans.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“Areas that experience urban growth are required to prepare a sewer master plan or update the current master plan. The Public Works and Planning Department is responsible for implementing the policies and implementation programs in the plan. This program is being implemented on an as needed basis.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: As needed → Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that areas experiencing urban growth were required to prepare new sewer master plans or update existing plans; however, the APRs did not provide information as to whether areas within the county were in need of such master plans.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program PF-D.A to read that the County will no longer prepare wastewater master plans for “<i>areas experiencing urban growth</i>” but, instead, will work with service providers to provide such plans for new development in unincorporated communities.</p> <hr/> <p><b>Conclusion:</b></p> <p>While the County has prepared sewer master plans for acreage within certain specific plans, there is no indication that the County has prepared sewer master plans for other areas undergoing growth pressures, such as the area along the I-5 corridor or the area within the boundary of the pending Friant-Millerton Regional Plan. (See Program LU-H.A and Policy LU-H.8.)</p> <p><b>Evidence of the successful implementation of Program PF-D.A during 2017:</b></p> <p>Poor.</p>

73	PF-E.A	<b>Deliverable:</b> As appropriate and In cooperation with flood control agencies, adoption of regulations and programs to implement required state and federal stormwater quality programs.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County was consulting with applicable agencies to formulate checklists and pertinent requirements to implement required state and federal stormwater quality programs.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County coordinates with the Fresno Metropolitan Flood Control District (FMFCD) who is the Lead Agency for the Municipal Storm Water Permit held by FMFCD, the cities of Fresno and Clovis, Fresno County, and California State University Fresno. The County also requires developments to file storm water permits with the State Water Resources Control Board when the project meets the minimum threshold for permitting.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p style="color: red;">Retain program as is.</p> <p style="color: red;">Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County cooperated with the Fresno Metropolitan Flood Control District (<b>FMFCD</b>) regarding municipal stormwater permits and that, as necessary, the County required project applicants to file stormwater permits with the state Water Resources Control Board.</p> <p>The FMFCD has jurisdiction over land within the cities of Fresno and Clovis (including the area just outside their city limits) plus land east of the Fresno/Clovis metropolitan area extending into the foothills up to the community of Tollhouse. The APRs did not state whether the County has a responsibility to implement state and federal stormwater quality programs elsewhere in the County.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to determine the extent to which the County has adopted regulations and programs to implement required state and federal stormwater quality programs.</p> <p><b>Evidence of the successful implementation of Program PF-E.A during 2017:</b></p> <p>Poor.</p>
74	PF-F.A	<b>Deliverable:</b> Evidence of the requirement that new commercial, industrial or multi-family residential uses accommodate the collection and storage of recyclables.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that this program is an ongoing practice of the County.</p> <p><b>2013/2014 APR</b></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that as the County reviewed new commercial, industrial and residential uses, it recommended adequate areas for the</p>

		<p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The Public Works and Planning staff review and comment on Initial Studies/Environmental Assessments and, when appropriate, provide comments recommending that new commercial, industrial, and multi-family residential uses provide adequate areas on site for the collection and storage of recyclable materials. The County implemented a mandatory hauler program in the mid-2000s to mandate refuse and recycling collection for all unincorporated areas.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 01-02 → Ongoing.</p>	<p>collection and storage and collection of recyclable materials.</p> <p>The APRs also stated that the County had implemented a hauler program in the mid-2000s that mandated refuse and recycling collection.</p> <hr/> <p><b>Conclusion:</b></p> <p>Although the County’s APRs stated that the County only “recommended” that new commercial, industrial and residential uses provide adequate areas for the collection and storage of recyclable materials, based on the implementation of a “mandatory” hauler program in the mid-2000s, it may be assumed that the Program PF-F.A has been implemented.</p> <p><b>Evidence of the successful implementation of Program PF-F.A during 2017:</b></p> <p>Good.</p>
75	PF-G.A	<p><b>Deliverables:</b> Adoption of a master plan for the location of sheriff substations.</p> <p>Evaluation of such master plans during the update of regional and community plans.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County had recently put into operation substations in the rural communities of Squaw Valley and Auberry and that the County was working on the relocation of its Area 2 substation.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Sheriff’s Department has established substations in unincorporated County areas to be able to provide faster response to service calls. Although no master plan has been prepared, when Community Plans are updated, a location is identified for a Sheriff’s</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County had not adopted a master plan for the location of sheriff substations.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not adopted a master plan for the location of sheriff substations.</p> <p><b>Evidence of the successful implementation of Program PF-G.A during 2017:</b></p> <p>None.</p>

		<p><i>substation. Further, the Sheriff's Department actively works with Public Works and Planning staff on land use matters pertinent to their facilities.</i></p> <p><i>As an example, during the Laton Community Plan Update Public Works and Planning Department staff worked with Sheriff's Department staff to identify a potential location for a future Sheriff's substation."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: As Needed → ∅</p>	
76	PF-H.A	<p><b>Deliverable:</b> Evidence that discretionary development projects are not approved unless...</p> <p>(a) A Fire Protection Master Plan has been adopted or</p> <p>(b) Fire facilities acceptable to the Director of the Department of Public Works and Planning are provided.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County routed applications for discretionary development projects to the appropriate fire districts for review and comment and that the districts' comments were included as conditions of approval for those same projects.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"The Public Works and Planning staff routes all projects to the appropriate fire district for review and comment. The District then identifies appropriate fire protection measures to accommodate the project. Upon consultation with the District, Staff will include the fire district as conditions of approval for each project."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: As Needed → ∅</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2002, 2015, 2016 and 2017 APRs stated that the Department of Public Works and Planning routes development projects to the appropriate fire districts for review and comment and that those comments are subsequently included as conditions of project approval.</p> <hr/> <p><b>Conclusion:</b></p> <p>Discretionary development projects are not approved unless fire protection facilities are acceptable to the local fire district and the Director of the Department of Public Works and Planning.</p> <p><b>Evidence of the successful implementation of Program PF-H.A during 2017:</b></p> <p>Good.</p>

77	PF-H.B	<p><b>Deliverable:</b> In cooperation with the California Department of Forestry and Fire Protection and local fire protection agencies, consolidation and standardization of fire protection services.</p>	
	<p><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County had initiated a study of countywide fire protection services and that a final report was due in January 2003.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County works cooperatively with the California Department of Forestry and Cal Fire on various land use and permit matters. The County contracts with the California Department of Forestry / Cal Fire for the Amador Plan during the non-fire season to provide additional protection.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County works cooperatively with the California Department of Forestry and Cal Fire on various land use and permit matters.</p> <p>The APRs did not state that fire protection services had been consolidated and standardized.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to determine the extent to which fire protection services have been consolidated and standardized.</p> <p><b>Evidence of the successful implementation of Program PF-H.B during 2017:</b></p> <p>Poor.</p>	
78	PF-I.A	<p><b>Deliverable:</b> As regional, community and specific plans are updated, and in cooperation with applicable school districts, identification of the locations for new or expanded school facilities.</p>	
	<p><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that expanding school facilities would be part of the planned update of regional, community and specific plans.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p>	<p><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that identification of the location for new or expanded school facilities was part of the update of regional, community and specific plans.</p> <p>With regard to the siting of new schools, there were no General Plan Conformity requests during 2017.</p> <hr/>	

		<p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The County involves the respective school district in the update of each regional, community and specific plan to identify the need for and potential location of new or expansion of existing facilities. Further, through the General Plan Conformity (GPC) findings process, potential school site acquisitions are evaluated for consistency with the General Plan. This is required per Public Resources Code 21151.2 and Government Code 65402. No GPC requests were processed for school sites in 2017.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p><b>Conclusion:</b></p> <p>In the process of updating regional, community and specific plans, the locations for new or expanded school facilities are identified.</p> <p><b>Evidence of the successful implementation of Program PF-I.A during 2017:</b></p> <p>Good.</p>
79	PF-I.B	<p><b>Deliverable:</b> As regional, community and specific plans are updated, and in cooperation with applicable library districts and library interest groups, identification of the need for new or expanded library facilities.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that this program for expanding library facilities would be part of the planned update of regional, community and specific plans.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County involves library administration in the update of each regional, community and specific plan to identify the need for and potential location of new or expansion of existing libraries.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that identification of the need for new or expanded library services was part of the update of regional, community and specific plans.</p> <hr/> <p><b>Conclusion:</b></p> <p>In the process of updating regional, community and specific plans, the locations for new or expanded library facilities are identified.</p> <p><b>Evidence of the successful implementation of Program PF-I.B during 2017:</b></p> <p>Good.</p>



## 2000 OPEN SPACE AND CONSERVATION ELEMENT

80	OS-A.A	<p><b>Deliverable:</b> Development, implementation and maintenance of a water sustainability plan.</p>	
81	OS-A.B	<p><b>Deliverable:</b> Development and maintenance of a centralized water resource database for surface and groundwater that includes a water budget, groundwater monitoring data and groundwater recharge site inventory.</p>	

County Reporting	League Reporting
<p><b>2002 APR</b></p> <p>The 2002 APR stated that the Water, Geology and Natural Resources Section of the Planning Department was gathering data for development of a water sustainability plan.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“In June 2006 the County adopted a Fresno Area Regional Groundwater Management Plan. Also, with the passage of the Sustainable Groundwater Management Act, local agencies within the Kings, Westside, and Delta Mendota basins in the County will be required to form Groundwater Sustainability Agencies which will in turn create Groundwater Sustainability Plans. The plans are required to be adopted by January 31, 2020.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 01-02 → Ø</p>	<p>The County’s 2015, 2016 and 2017 APRs stated that in 2006 the County adopted a Fresno Area Regional Groundwater Management Plan. That plan was not countywide; it only covered acreage within and just northeast of the Fresno Irrigation District.</p> <p>The APRs also stated that as a requirement of the Groundwater Management Act of 2014 (SGMA), groundwater sustainability agencies would need to adopt groundwater sustainability plans by January 31, 2020. The provisions of that statute did not directly bear on the County’s obligation under Program OS-A.A to develop, implement and maintain the County’s own water sustainability plan.</p> <hr style="width: 20%; margin-left: auto; margin-right: 0;"/> <p><b>Conclusion:</b></p> <p>The County has not developed a countywide water sustainability plan.</p> <p><b>Evidence of the successful implementation of Program OS-A.A during 2017:</b></p> <p>None.</p>

		<p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Water budget development and maintenance will be required through the implementation of the Sustainable Groundwater Management Act in areas with aquifers identified as being in a condition of critical overdraft. The County has completed a study through the AB 303 Local Groundwater Assistance Grant funding, to identify potential recharge sites northeast of the City of Fresno and City of Clovis. As development occurs, the County will use this information to attempt to preserve those areas identified as prime recharge areas.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 01-02 → Ø</p>	<p>not directly bear on the County’s obligation under Program OS-A.B to develop, implement and maintain its own centralized water resource database for surface and groundwater.</p> <p>The APRs also stated that the County had completed a study through AB 303 Local Groundwater Assistance Grant funding to identify potential recharge sites. However, that study only looked at the area northeast of the City of Fresno and City of Clovis.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not developed a centralized water resource database for surface and groundwater that includes a water budget, groundwater monitoring data and groundwater recharge site inventory.</p> <p><b>Evidence of the successful implementation of Program OS-A.B during 2017:</b></p> <p>None.</p>
82	OS-A.C	<p><b>Deliverables:</b> Development, implementation and maintenance of a groundwater monitoring program.</p> <p>Annual report of information from this program to the Board of Supervisors during the annual review of the General Plan.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Water, Geology and Natural Resources Section of the Planning Department was gathering data for a groundwater monitoring program.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that this program was among 12 others that had been delayed <i>“for a number of reasons, including the lack of available funding.”</i></p> <p><b>2015 and 2016 APRs</b></p> <p>These APRs each stated that program implementation had been delayed.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2013/2014, 2015 and 2016 APRs stated that program implementation had been delayed.</p> <p>The County’s 2017 APR stated that groundwater monitoring and reporting would be a key component of the implementation of the Sustainable Groundwater Management Act of 2014. The provisions of that statute did not directly bear on the County’s obligation under Program OS-A.C to develop, implement and maintain the County’s own groundwater monitoring program.</p> <p>And although Program OS-A.C required the County to provide information on groundwater</p>

		<p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Groundwater monitoring and reporting will be a key component of the implementation of Sustainable Groundwater Management Act. By January 31, 2020, Groundwater Sustainability Agencies within the County will be required to adopt a Groundwater Sustainability Plan for implementation.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 01-02 → Ø</p>	<p>monitoring to the Board of Supervisors during its annual review of the General Plan, the County’s 2017 APR did not contain that information.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not developed a groundwater monitoring program.</p> <p><b>Evidence of the successful implementation of Program OS-A.C during 2017:</b></p> <p>None.</p>
83	OS-A.D	<p><b>Deliverable:</b> Development, implementation and maintenance of land use plans for the preservation of groundwater recharge areas.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that no progress had been made to implement this program, and the APR recommended the target date for accomplishment be changed from fiscal year 2002-2003 to fiscal year 2003-2004. The APR added that <i>“the lack of progress is principally due to the allocation of resources associated with funding and/or staffing.”</i></p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County has completed a study through the AB 303 Local Groundwater Assistance Grant funding to identify potential recharge sites northeast of the City of Fresno and City of Clovis. As development occurs, the County will use this information to attempt to preserve those areas identified as prime recharge areas.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County had completed a study to identify potential recharge sites northeast of the City of Fresno and City of Clovis. The APRs did not indicate that the County was prepared to develop land use plans for the preservation of groundwater recharge areas elsewhere in the county.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to determine that the County has developed countywide land use plans for the preservation of groundwater recharge areas.</p> <p><b>Evidence of the successful implementation of Program OS-A.D during 2017:</b></p> <p>Poor.</p>

		<p>Change time frame: FY 01-02 → 2018-? and Ongoing.          (The question mark in the time frame above is written in place of the year because that portion of the County's Draft 2017 Policy Document is unreadable.)</p>	
84	OS-B.A	<p><b>Deliverables:</b> In consultation with the California Department of Forestry and Fire Protection, evaluation of Forest Practice Rules with regard to...</p> <ul style="list-style-type: none"> <li>(a) Clearcutting,</li> <li>(b) Use of prescribed burning,</li> <li>(c) Protection of biological, soil, and water resources,</li> <li>(d) Protection of old growth forests.</li> </ul> <p>If the Forest Practice Rules are determined to be inadequate, a proposal from the County to the Board of Forestry to address the inadequacies.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for accomplishment was fiscal year 2003-2004.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"The Department of Forestry and Fire Protections enforcement authority granted under the Forest Practice Act and Rules is only applicable when conversion of land from a use other than growing a commercial crop of trees, or commercialization of forest products occurs and is only applicable on private land.</i></p> <p><i>Forested stands within Fresno County that may be characterized as 'Old Growth' may exist in extremely limited acreages and most likely exist exclusively on national forest land."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 03-04 → 2021-?.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the enforcement authority of the Department of Forestry and Fire Protection applied only to matters related to the commercial use of forest products. The APRs indicated that old growth forests may exist on extremely limited acreages for areas outside of national forests.</p> <p>The APRs did not state that the County had entered into consultation with the California Department of Forestry and Fire Protection to evaluate (a) clearcutting, (b) the use of prescribed burning, (c) the protection of biological, soil, and water resources, and (d) the protection of old growth forests.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not evaluated the Forest Practice Rules regarding clearcutting, use of prescribed burning, protection of biological, soil, and water resources, and protection of old growth forests.</p> <p><b>Evidence of the successful implementation of Program OS-B.A during 2017:</b></p>

		(The question mark in the time frame above is written in place of the year because that portion of the County's Draft 2017 Policy Document is unreadable.)	None.
85	OS-B.B	<p><b>Deliverables:</b> Encouragement to the California Department of Forestry and Fire Protection to complete an Inventory of ancient and old growth forests in Fresno County.</p> <p>Incorporation of that inventory into the County's biological resources database for use in future land use planning.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for accomplishment was fiscal year 2003-2004.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program, the only difference being that the 2016 and 2017 APRs added the underlined sentence. The appraisal from the 2017 APR is printed in full below:</p> <p><i>"The Department of Forestry and Fire Protection has no mandate or authority to enter private timber lands unless enforcement of the Forest Practice Act and rules have been triggered.</i></p> <p><i>Forested stands within Fresno County that may be characterized as 'Old Growth' may exist in extremely limited acreages and most likely exist exclusively on national forest land.</i></p> <p><u><i>As part of the General Plan Review process, policies and programs of the Open Space and Conservation Element are being reviewed to determine which policies still serve a purpose and should be kept and which ones have served their purpose or are no longer relevant and should be deleted or revised."</i></u></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: FY 03-04 → 2018-? and Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that unless enforcement of the Forest Practice Act had been triggered, the Department of Forestry and Fire Protection had no authority to enter private timber lands. (This statement suggested that implementation of Program OS-B.B may not have been possible.)</p> <p>Nonetheless, the County has proposed (through its December 2017 draft of the Policy Document) to retain Program OS-B.B and to add to it a provision that the California Department of Forestry and Fire Protection complete an inventory of old growth forests that includes, as well, the "condition" of those forests.</p> <p>The APRs did not state that the County had encouraged the California Department of Forestry and Fire Protection to complete an Inventory of ancient and old growth forests in Fresno County.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County's APRs to indicate that the County has encouraged the California Department of Forestry and Fire Protection to complete an Inventory of ancient and old growth forests in Fresno County or that the County incorporated such an inventory into the its biological resources database for use in future land use planning.</p> <p><b>Evidence of the successful implementation of Program OS-B.B during 2017:</b></p>

		(The question mark in the time frame above is written in place of the year because that portion of the County's Draft 2017 Policy Document is unreadable.)	None.
86	OS-B.C	<b>Deliverable:</b> Encouragement to the U.S. Forest Service and the California Department of Forestry and Fire Protection to identify potential impacts on, and the need for preservation of, old growth forests.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for accomplishment was fiscal year 2003-2004.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"The California Department of Forestry and Fire Protection is required by law to identify potential impacts to a wide variety of natural and cultural resources when engaging in a discretionary project that triggers compliance with the California Environmental Quality Act (CEQA).</i></p> <p><i>Forested stands within Fresno County that may be characterized as 'Old Growth' may exist in extremely limited acreages and most likely exist exclusively on national forest land."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: FY 03-04 → Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that in compliance with the California Environmental Quality Act (CEQA), the Department of Forestry and Fire Protection engaged in identifying potential impacts to a variety of natural resources. In addition, the APRs indicated that old growth forests may exist on extremely limited acreages for areas outside of national forests.</p> <p>The APRs did not state that the County had encouraged the U.S. Forest Service and the California Department of Forestry and Fire Protection to identify potential impacts on, and the need for preservation of, old growth forests.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program OS-B.C to read that the County will also participate in U.S. Forest Service management plan development and encourage the U.S. Forest Service and the California Department of Forestry and Fire Protection to address multiple forest management goals supporting healthy forests, habitat, watershed, fuels reduction, special management of old growth forests and other unique biotic or geologic features, and economic and recreational uses of forest resources.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County's APRs to indicate that the County has encouraged the U.S. Forest Service and the California Department of Forestry and Fire Protection to identify potential impacts on, and the need for preservation of, old growth forests.</p>

			<p><b>Evidence of the successful implementation of Program OS-B.C during 2017:</b></p> <p>None.</p>
87	OS-B.D	<p><b>Deliverable:</b> Request to the California Department of Forestry and Fire Protection that it include in its Notices of Intent to Harvest Timber educational materials for residents on the Forest Practice Act, Forest Practice Rules and the Timber Harvest Plan review process.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for accomplishment was fiscal year 2003-2004.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“ ‘Notice of Intent to Harvest Timber’ (NOI) is a specific requirement of the Forest Practice Act and Rules and is required for a wide variety of timber harvest documents. A modification of the NOI would require rule change by the Board of Forestry (BOF).”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: FY 03-04 → Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that a Notice of Intent (<b>NOI</b>) to Harvest Timber was required for a wide variety of timber harvest documents and that modifying the NOI would require a rule change by the Board of Forestry. (This statement suggested that implementation of Program OS-B.D may not have been possible.)</p> <p>The APRs did not say that the County had requested the California Department of Forestry and Fire Protection to include in its Notices of Intent to Harvest Timber educational materials for residents on the Forest Practice Act, Forest Practice Rules and the Timber Harvest Plan review process.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program OS-B.D to read that the County will shift from the obligation to make a “<i>formal request</i>” for inclusion of educational materials in NOIs to an obligation to “<i>encourage</i>” the California Department of Forestry and Fire Protection to include those education materials.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County’s APRs to indicate that the County has requested the California Department of Forestry and Fire Protection to include in its Notices of Intent to Harvest Timber educational materials for residents on the Forest Practice Act, Forest Practice Rules and the Timber Harvest Plan review process.</p>

			<p><b>Evidence of the successful implementation of Program OS-B.D during 2017:</b></p> <p>None.</p>
88	OS-D.A	<p><b>Deliverable:</b> Evidence of working with various agencies and non-profit conservation organizations for them to acquire creek corridors, wetlands and areas rich in wildlife, and fragile eco structure where such areas cannot be effectively preserved through the regulatory process.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that through June of 2002 there was no County Planning activity with respect to this program; however, the APR also stated that the preservation of vernal pools in the Millerton New Town Area (consistent with the mitigation measures of the project and the provision for on-going monitoring through CSA 34) was anticipated in fiscal year 2002-2003.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County continues to coordinate with the San Joaquin River Conservancy for projects in the vicinity of their resources. Further, through discretionary land use permits, the County will review requests by the California Department of Fish and Wildlife (CAF&amp;W) for offsetting habitats, consider mitigation and review and formal proposal for mitigation banking to CAF&amp;W.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County continued to work with the San Joaquin River Conservancy (<b>Conservancy</b>) to develop the San Joaquin River Parkway and to work with the California Department of Fish and Wildlife (<b>CDFW</b>) to review CDFW proposals for protecting habitat areas. The Conservancy and CDFW are state agencies.</p> <p>The protections described in the paragraph above are regulatory in nature. The APRs provided no information that the County was working with agencies and non-profit conservation organizations to protect areas that <i>“cannot not be effectively preserved through the regulatory process.”</i></p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County’s APRs to indicate that the County has been working with various agencies and non-profit conservation organizations for them to acquire creek corridors, wetlands and areas rich in wildlife, and fragile eco structure where such areas cannot be effectively preserved through regulatory processes.</p> <p><b>Evidence of the successful implementation of Program OS-D.A during 2017:</b></p> <p>None.</p>
89	OS-D.B	<p><b>Deliverable:</b> Adoption of an ordinance identifying riparian protection zones and allowable activities and mitigation techniques in those zones.</p>	



		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for accomplishment was fiscal year 2002-2003; nonetheless, the APR recommended changing the time frame to fiscal year 2003-2004. The APR added that <i>“the lack of progress is principally due to the allocation of resources associated with funding and/or staffing.”</i></p> <p><b>2013/2014, 2015, 2016 and 2017 APRs</b></p> <p>These APRs each stated that program implementation had been delayed. The 2013/2014 APR gave a reason – <i>“the lack of available funding.”</i></p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Due to budgetary constraints, a specific ordinance has not been adopted. The County continues to coordinate with resource agencies for projects located within sensitive habitat and applies policies for those proposals within river influence areas.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-03 → Ø</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that an ordinance identifying riparian protection zones had not been adopted.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not adopted an ordinance identifying riparian protection zones and allowable activities and mitigation techniques in those zones.</p> <p><b>Evidence of the successful implementation of Program OS-D.B during 2017:</b></p> <p>None.</p>	
	90	OS-E.A	<p><b>Deliverables:</b> Compilation and regular update of inventories (and maps) of areas of ecological significance based on the California Wildlife Habitats Relationships (WHR) system, including unique natural areas, wetlands, riparian areas, and habitats for special-status plants and animals.</p> <p>Consultation of the inventories and maps when revising plans or considering project development proposals.</p>	<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Environmental Analysis Unit of the Planning Department was (1) compiling, reviewing and updating in-house data and (2) working with the US Fish and Wildlife Service and the California Department of Fish and Game (now known as the California Department of Fish and Wildlife) to determine the data those agencies routinely review when a project</p>

		<p>is submitted to them for review and what information Fresno County needed to develop to cooperatively facilitate project review.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Development projects that may have a potential impact on wetlands, riparian areas and habitats for special-status plants and animals are referred to the State Department of Fish and Wildlife and United States Fish and Wildlife Service for review and comments. Recommended mitigation measures proposed by these agencies will be considered during the environmental review of development projects.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Ongoing → Ø</p>	<p>and to the United States Fish and Wildlife Service for review and comment.</p> <p>The APRs provided no information in support of the requirement that the County compile and regularly update inventories (and maps) of areas of ecological significance based on the California Wildlife Habitats Relationships system, including unique natural areas, wetlands, riparian areas, and habitats for special-status plants and animals.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not compiled inventories of areas of ecological significance based on the California Wildlife Habitats Relationships system.</p> <p><b>Evidence of the successful implementation of Program OS-E.A during 2017:</b></p> <p>None.</p>				
91	OS-E.B	<p><b>Deliverables:</b> As they are made available by the California Department of Fish and Wildlife (CDFW), maintenance of maps identifying significant habitat for important fish and game species.</p> <p>In consultation with CDFW, determination by the County of the relative importance of these game species.</p> <p>Consultation of these maps when revising plans or considering project development proposals.</p>	<table border="1"> <thead> <tr> <th data-bbox="977 1381 1302 1444">County Reporting</th> <th data-bbox="1302 1381 1534 1444">League Reporting</th> </tr> </thead> <tbody> <tr> <td data-bbox="977 1444 1302 1971"> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Environmental Analysis Unit of the Planning Department was (1) compiling, reviewing and updating in-house data and (2) working with the US Fish and Wildlife Service and the California Department of Fish and Game (now known as the California Department of Fish and Wildlife) to determine the data those agencies routinely review when a project is submitted to them for review and what information Fresno County needed to develop to cooperatively facilitate project review.</p> <p><b>2013/2014 APR</b></p> </td> <td data-bbox="1302 1444 1534 1971"> <p>The County’s 2015, 2016 and 2017 APRs stated that the County referred development projects that may have a potential impact on wetlands, riparian areas and habitats for special-status plants and animals to the California Department of Fish and Wildlife and to the United States Fish and Wildlife Service for review and comment. The APRS also stated that the County had access to state-maintained software that provided current biological data in an electronic mapping database.</p> </td> </tr> </tbody> </table>	County Reporting	League Reporting	<p><b>2002 APR</b></p> <p>The 2002 APR stated that the Environmental Analysis Unit of the Planning Department was (1) compiling, reviewing and updating in-house data and (2) working with the US Fish and Wildlife Service and the California Department of Fish and Game (now known as the California Department of Fish and Wildlife) to determine the data those agencies routinely review when a project is submitted to them for review and what information Fresno County needed to develop to cooperatively facilitate project review.</p> <p><b>2013/2014 APR</b></p>	<p>The County’s 2015, 2016 and 2017 APRs stated that the County referred development projects that may have a potential impact on wetlands, riparian areas and habitats for special-status plants and animals to the California Department of Fish and Wildlife and to the United States Fish and Wildlife Service for review and comment. The APRS also stated that the County had access to state-maintained software that provided current biological data in an electronic mapping database.</p>
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		<p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County refers development projects to the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (formerly CDFG) for review and comment as to any potential impact on sensitive species of plants or animals. County staff also has access to State-maintained software which provides updated maps containing biological data in an electronic mapping database.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Ongoing → ∅</p>	<p>The APRs provided no evidence that the County had maintained maps identifying significant habitat for important fish and game species as they were made available by CDFW or determined the relative importance of fish and game species.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not maintained maps identifying significant habitat for important fish and game species.</p> <p><b>Evidence of the successful implementation of Program OS-E.B during 2017:</b></p> <p>None.</p>
92	OS-F.A	<p><b>Deliverable:</b> Preparation and a full review at least every two years of lists of state and federal rare, threatened and endangered plant species known or suspected to occur in the county.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County’s Environmental Analysis Unit of the Planning Department was (1) compiling, reviewing and updating in-house data and (2) working with the California Native Plant Society and the California Department of Fish and Game (now known as the California Department of Fish and Wildlife) to verify the existence of the plant species included in the California Native Plant Society’s Inventory of Rare and Endangered Vascular Plants of California and in the listings of species of special concern designated by the Dept. of Fish and Wildlife.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County refers development projects to the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (formerly CDFG) for review and</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County referred development projects to the California Department of Fish and Wildlife and to the United States Fish and Wildlife Service for review and comment. The APRs also stated that the County had access to state-maintained software that provided current biological data in an electronic mapping database.</p> <p>The APRs did not state that the County had prepared, and fully reviewed at least every two years, lists of state and federal rare, threatened and endangered plant species known to occur or suspected to occur in the county.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not fully reviewed, at least every two years, lists of state and federal rare, threatened and endangered plant</p>

		<p><i>comment as to any potential impact on sensitive species of plants or animals. County staff also has access to State-maintained software which provides updated maps containing sensitive species of plants and animals in an electronic mapping database (Rare Final 5, etc.)."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 00-01 → Ø</p>	<p>species known or suspected to occur in the county.</p> <p><b>Evidence of the successful implementation of Program OS-F.A during 2017:</b></p> <p>None.</p>
93	OS-F.B	<p><b>Deliverable:</b> Dissemination of the Fresno County Oak Management Guidelines to landowners of property with oak woodland habitat.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that work on a brochure (Fresno County Oak Management Guidelines) was anticipated to be initiated in the last half of fiscal year 2002-2003 and that once the areas of oak woodland habitat had been determined, the brochure would be completed and distributed with every permit issued within those areas.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"The boundaries of the oak woodland habitat area have yet to be established; when they are, a handout will be prepared and distributed with every permit that is issued within these areas. Individual projects in oak woodland areas are evaluated for buffering or tree preservation requirements depending on the sensitivity of the habitat and relative health of tree growth as indicated by independent studies provided by project applicants. Further, Policy OS-F.11 which contains the County's Oak Woodlands Management Guidelines is considered."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that the boundaries of oak woodland habitat had not been determined and that a handout of the County's guidelines for the management of oak woodlands (as delineated on page 5-21 of the 2000 General Plan) had not been created.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not determined the locations of oak woodland habitat in the county and has not prepared a handout of the County's Oak Management Guidelines for landowners throughout the county who have property with oak woodland habitat.</p> <p><b>Evidence of the successful implementation of Program OS-F.B during 2017:</b></p> <p>None.</p>

**Deliverables:** Review of the Guide for Assessing and Mitigating Air Quality Impacts published by the San Joaquin Valley Air Pollution Control District (SJVAPCD).

Adoption of procedures for performing air quality impact analyses and adopting mitigation measures with any modifications of the SJVAPD guidelines deemed appropriate.

### County Reporting

#### 2002 APR

The 2002 APR stated that the Environmental Analysis Unit of the Planning Department was working with the San Joaquin Valley Air Pollution Control District to review and possibly revise existing standard methods or procedures for determining and mitigating project air quality impacts for use in County environmental documents.

#### 2013/2014 APR

The 2013/2014 APR stated that program implementation had been delayed. The 2013/2014 APR gave a reason – *“the lack of available funding.”*

#### 2015 and 2016 APRs

Unlike the 2013/2014 APR, the 2015 and 2016 APRs stated that the program had been implemented.

#### 2015, 2016 and 2017 APRs

These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:

*“The County refers development projects to the SJVAPCD for review and comment on potential air quality impacts and requires development projects to comply with SJVAPCD rules to mitigate any impact on air quality. For Discretionary projects, County staff will review SJVAPCD comments and require district requirements as warranted (i.e., indirect source review, etc.) as part of the CEQA review process.”*

#### Recommendations in the Draft 2017 Policy Document

Retain program as is.

Change time frame: FY 02-03 → 2018-?.

(The question mark in the time frame above is written in place of the year because that portion of the County's Draft 2017 Policy Document is unreadable.)

### League Reporting

The County's 2015, 2016 and 2017 APRs stated that the County referred development projects to the San Joaquin Valley Air Pollution Control District (**SJVAPCD**) for review and comment.

The APRs did not state that the County had reviewed SJVAPCD's *Guide for Assessing and Mitigating Air Quality Impacts* or that it had adopted procedures for performing air quality impact analyses.

Since the 2013/2014 APR reported that the program had not been initiated by that year and since the 2015 APR reported that the program had been implemented, it may be assumed that the County adopted procedures for performing air quality impact analyses sometime during 2015. An electronic search using the keyword phrase *“air quality”* of all of the County's 2015 meeting agendas for the Planning Commission and Board of Supervisors did not reveal any action regarding the adoption of new procedures for performing air quality impact analyses.

(It should be noted that even though the County's 2015 and 2016 APRs stated that the Program OS-G.A had been implemented, the County has proposed through its December 2017 draft of the Policy Document to amend the time frame for accomplishing Program OS-G.A from FY 02-03 to calendar year 2018 or beyond.)

#### Conclusion:

The County has not reviewed the Guide for Assessing and Mitigating Air Quality Impacts published the San Joaquin Valley Air Pollution Control District and adopted

			<p>procedures for performing air quality impact analyses and adopting mitigation measures.</p> <p><b>Evidence of the successful implementation of Program OF-G.A during 2017:</b></p> <p>None.</p>
95	OS-G.B	<p><b>Deliverable:</b> Adoption of a package of programs to reduce County employee work-related vehicular trips.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>Below is the full text of the 2002 APR appraisal of this program.</p> <p><i>“The County has begun to use video conferencing for both inter-County and intra-county meetings, with the resultant reduction in employee work-related vehicular trips. The County is also in the planning and development stages of countywide e-government programs that will impact the number of vehicular trips required to conduct business.”</i></p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of this program. That appraisal is printed in full below. (Note: The underlined sentences appeared in the 2002 APR.)</p> <p><i>“The County commonly promotes and utilizes telephone conference calling in lieu of physical meetings so as to minimize travel related impacts.</i></p> <p><u><i>The County has begun to use video conferencing for both inter-County and intra-county meetings, with the resultant reduction in employee work-related vehicular trips. The County is also in the planning and development stages of countywide e-government programs that will impact the number of vehicular trips required to conduct business.</i></u></p> <p><i>Additionally, given the increasing quality of current aerial photos and the available historical imagery which allows comparative analysis, County staff can in some instances use aerial information rather than conducting field visits.</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002, 2015, 2016 and 2017 APRs stated that the County had begun using video conferencing, had begun to develop countywide e-government programs, was employing telephone conferencing and was utilizing aerial photos in lieu of field visits.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to make a small wording change that would not constitute a major shift in the focus of the program.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has adopted a package of programs to reduce County employee work-related vehicular trips.</p> <p><b>Evidence of the successful implementation of Program OS-G.B during 2017:</b></p> <p>Good.</p>

		<p><i>The County encourages employee participation in FCOG's car and van pool program."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: FY 02-03 → Ongoing.</p>	
96	OS-G.C	<p><b>Deliverable:</b> Amendment of the Subdivision and Grading Ordinances and Development Standards to address dust control measures for new development, access roads and parking areas to assist the San Joaquin Valley Air Pollution District in the regulation of particulate matter of less than 10 microns (PM<sub>10</sub>).</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the planning staff was drafting revised improvement standards for dust control to update the 1966 ordinances and that it was anticipated that a draft documents would be circulated in the last half of fiscal year 2002-2003. In the interim, fugitive dust control measures were included as conditions of approval or mitigation measures, as applicable, for specific entitlement projects.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"All development projects must comply with the SJVAPCD regulations for dust control and project conditions or mitigation for discretionary land use permits may require additional levels of dust control."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 02-03 → 2018-?.</p> <p>(The question mark in the time frame above is written in place of the year because that portion of the County's Draft 2017 Policy Document is unreadable.)</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that all development projects must comply with SJVAPCD regulations for dust control.</p> <p>The APRs did not state that the County had amended its Subdivision and Grading Ordinances and Development Standards to assist the San Joaquin Valley Air Pollution Control District in the regulation of particulate matter (PM<sub>10</sub>).</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County's APRs to indicate that the County has amended its Subdivision and Grading Ordinances and Development Standards to assist the San Joaquin Valley Air Pollution District in the regulation of particulate matter (PM<sub>10</sub>).</p> <p><b>Evidence of the successful implementation of Program OS-G.C during 2017:</b></p> <p>None.</p>

97	OS-H.A	<p><b>Deliverables:</b> In consultation with local, state and federal agencies, completion of an inventory of all recreation areas and services in the county and identification of other areas suitable for park acquisition.</p> <p>Consideration of the preparation of a County park and recreation master plan to provide a policy framework for independent implementation by cooperating agencies.</p>
	<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that funds were not available for consultant services to prepare a comprehensive Parks Master Plan that would include surveys of all existing regional facilities; furthermore, that due to uncertain fiscal constraints, it was unknown when such funds would become available. Nonetheless, the 2002 APR recommended that the target date for implementation be extended from fiscal years 2001-2003 to fiscal year 2005-2006.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Funds have not been available to prepare a comprehensive inventory of all parks and recreation areas and to identify other areas suitable for park acquisition and development.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Change time frame: FY 01-03 → 2018-? and 2021-?. (The question marks in the time frame above are written in place of the years because those portions of the County’s Draft 2017 Policy Document are unreadable.)</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002, 2015, 2016 and 2017 APRs stated that due to a lack of funding, the County had not prepared a comprehensive inventory of all parks and recreation areas or identified other areas suitable for park acquisition and development.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program OS-H.A to clarify (1) that the inventory of parks would be limited to County-owned parks and (2) that any other areas identified as suitable for park development would be “<i>potentially</i>” suitable for acquisition.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not completed an inventory of all recreation areas and services in the county or identified other areas suitable for park acquisition.</p> <p><b>Evidence of the successful implementation of Program OS-H.A during 2017:</b></p> <p>None.</p>
98	OS-H.B	<p><b>Deliverables:</b> For the development and maintenance of parks, as new development occurs, consideration of contracting with existing entities or forming new County Service Areas (CSAs) that have...</p> <p>(a) The authority to receive dedications or grants of land or funds and</p> <p>(b) The ability to charge fees for acquisition, development, and maintenance of parks, open space, and riding, hiking, and bicycle trails.</p>



		<b>County Reporting</b>	<b>League Reporting</b>
		<p><b>2002 APR</b></p> <p>The 2002 APR stated that as new development projects were proposed the Resources Division of the Planning Department considered contracting with existing entities or forming new County Service Areas to hold and maintain parkland.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Public Works and Planning staff considers the need for an entity to hold and maintain parkland, open space, and trails as a part of the project review. The Department considers these service needs when a CSA is being formed or expanded. It should be noted that due to limitations of the Proposition 218 process [1996 California Constitutional Amendment – Local Initiative Power], which allows residents within a CSA to vote on or consider discontinuation of service, the use of CSAs for Services beyond basic services (i.e., sewer and water) can become problematic and has limited the use of CSAs in more recent developments.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p>The County’s 2015, 2016 and 2017 APRs stated that Public Works and Planning staff routinely considered the need for an entity to hold and maintain parkland, open space and trails as a part of its project review process.</p> <p>Because the 2015, 2016 and 2017 APRs did not provide information that an entity held or maintained parkland, open space and trails as a result of this program, it may be assumed that no discretionary projects considered by the County during 2015, 2016 and 2017 warranted consideration of contracting with existing entities or forming new County Service Areas for the development and maintenance of parks, open space and trails.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County routinely considers the need for an entity to hold and maintain parkland, open space and trails as a part of its project review process.</p> <p>(On the basis of the statement in the County’s 2015, 2017 and 2017 APRs that County Services Areas are not reliable entities for the maintenance of recreational amenities, the County may want to review and amend Program OS-H.B. In conducting that review, the County may want to define, if it has not already done so, the size and nature of the development projects that may be required to prepare and maintain parks, open space and trails.)</p> <p><b>Evidence of the successful implementation of Program OS-H.B during 2017:</b></p> <p>Good.</p>
99	OS-I.A	<p><b>Deliverable:</b> Preparation of a Recreation Trails Master Plan based on the County’s Conceptual Recreational Trail List and Recreational Trail Corridor Map.</p>	
		<b>County Reporting</b>	<b>League Reporting</b>

		<p><b>2002 APR</b></p> <p>The 2002 APR stated that the Fresno Council of Governments had agreed to fund an update of the County's Regional Trails Plan and that completion was expected during fiscal year 2002-2003.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that the program had been implemented.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. That appraisal from the 2017 APR is printed in full below:</p> <p><i>"This program has been implemented; the Fresno County Regional Bicycle and Recreational Trails Master Plan was adopted by the Board of Supervisors on September 24, 2013. This program will be deleted."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-03 → Ø</p>	<p>The County's 2015, 2016 and 2017 APRs stated that Recreation Trails Master Plan was adopted by the County in 2013.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has prepared a Recreation Trails Master Plan.</p> <p><b>Evidence of the successful implementation of Program OS-I.A during 2017:</b></p> <p>Good.</p>
100	OS-I.B	<p><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that "<i>no action</i>" had been taken to implement the program.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that the program has been implemented with adoption of the Regional Bicycle and Recreational Trails Master Plan.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs each stated that the program had been implemented.</p> <p>The APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>"This program has been implemented. It is included in the Fresno County Regional Bicycle and Recreational</i></p>	<p><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that information derived from the implementation of Program OS-I.B was included in the Fresno County Regional Bicycle and Recreational Trails Master Plan that was adopted in 2013.</p> <p>(It should be noted that although the County's 2013 Regional Bicycle and Recreational Trails Master Plan contained a list of federal funding sources for trail acquisition, it did not contain a list of land use controls for reserving areas for trails. Furthermore, there was no indication in the APRs or in the 2013 Master Plan that the County had conducted the required investigation.)</p> <hr/>

		<p><i>Trails Master Plan that was adopted by the Board of Supervisors on September 24, 2013. This program will be deleted.</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-03 → Ø</p>	<p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to determine that the County has investigated the potential of various types of land use controls to reserve areas for trails.</p> <p><b>Evidence of the successful implementation of Program OS-I.B during 2017:</b></p> <p>None.</p>
101	OS-I.C	<p><b>Deliverable:</b> Adoption of an ordinance to...</p> <p>(a) Prohibit use of multi-purpose trails by all motorized vehicles (except those used for maintenance vehicles).</p> <p>(b) Regulate users on multiple purpose paths and protect the interests of property owners adjacent to trails.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that “<i>no action</i>” had been taken to implement the program.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs each stated that the program had been implemented.</p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“This program has been implemented. It is included in the Fresno County Regional Bicycle and Recreational Trails Master Plan that was adopted by the Board of Supervisors on September 24, 2013. The County uses the California Department of Transportation (Caltrans) Manual on Uniform Traffic Control Devices (MUTCD) approved sign R44A on Class I bike paths. This program will be deleted.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that information derived from the implementation of Program OS-I.C was included in the Fresno County Regional Bicycle and Recreational Trails Master Plan that was adopted in 2013.</p> <p>(It should be noted that although the County’s 2013 Regional Bicycle and Recreational Trails Master Plan included this sentence: “<i>Motorized vehicles are not permitted on Class I bikeways except for maintenance,</i>” the Master Plan did not contain a policy to that effect, nor did it contain a set of regulations for the use of multiple purpose paths or the prohibition of motorized vehicles on multi-purpose trails. In addition, the Master Plan did not contain any regulations to protect the interests of property owners adjacent to trails.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to prohibit the use of multi-purpose trails by motorized vehicles,</p>

		<p>Change time frame: FY 01-02 → ∅</p>	<p>regulate users on multiple purpose paths and protect the interests of property owners adjacent to trails.</p> <p><b>Evidence of the successful implementation of Program OS-I.C during 2017:</b></p> <p>Poor.</p>
102	OS-J.A	<p><b>Deliverable:</b> Adoption and implementation of an ordinance to protect and preserve archaeological, historical and geographical sites.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Environmental Analysis Unit of the Planning Department was considering the feasibility and possible format and content of a Fresno County ordinance to protect and preserve significant archaeological, historical, and geological resources in Fresno County.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“Development projects are referred to State Historic Preservation Officer, the Fresno County Historical Landmarks and Records Advisory Commission and the Fresno County Historical Society for potential impact on significant archeological and historical and geological resources. However, no ordinance has been developed.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-03 → ∅</p> <p>Add new Program OS-J.A, which would read as follows:</p> <p><i>“The County shall prepare and maintain, using a GIS database, an inventory of historical sites, buildings, and landmarks.”</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the program had not been implemented.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to replace Program OS-J.A with new Program OS-J.A. While the current program requires the County to “<i>adopt and implement an ordinance</i>” to protect historic and geographical sites, the replacement program would require the County to “<i>prepare and maintain</i>” an inventory of historic sites, buildings, and landmarks.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand whether the County has adopted an ordinance to protect and preserve archaeological, historical and geographical sites.</p> <p><b>Evidence of the successful implementation of Program OS-J.A during 2017:</b></p> <p>None.</p>

103	OS-L.A	<p><b>Deliverable:</b> In cooperation with the Fresno Council of Governments (FCOG) and the Association for the Beautification of Highway 99, creation of a landscape master plan and design guidelines for the Highway 99 corridor.</p>	
	<p><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that a landscape master plan had been developed and adopted by the Association for the Beautification of Highway 99 and its member agencies.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that the program was no longer necessary because of the establishment of the Highway 99 Beautification Overlay District and the adoption of the Highway 99 Beautification Ordinance.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“This program has been implemented via adoption of Amendment to Text (AT) No. 361 on July 8, 2008, and has been incorporated into the Zoning Ordinance. This program will be deleted.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 03-04 → Ø</p>	<p><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the program had been implemented through the July 8, 2008 adoption of County Ordinance 850.C (Highway Beautification Overlay Standards).</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has created a landscape master plan and design guidelines for the Highway 99 corridor.</p> <p>(It should be noted that the Association for the Beautification of Highway 99 was formed in the spring of 1999 and that its members are appointed by the cities of Fresno, Fowler, Salma and Kingsburg and by the County of Fresno. In September 2016, the Association prepared a Highway 99 Beautification Master Plan. If the County has not done so, it should review and update its 2008 ordinance to ensure that it conforms to the goals and policies of the 2016 Master Plan.)</p> <p><b>Evidence of the successful implementation of Program OS-L.A during 2017:</b></p> <p>Good.</p>	
104	OS-L.B	<p><b>Deliverable:</b> In consultation with the California Department of Transportation (Caltrans), application for scenic highway designation for state highway segments eligible for such designation.</p>	
	<p><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR did not review this program because the target date for its accomplishment was fiscal year 2003-2004.</p> <p><b>2013/2014 APR</b></p>	<p><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that in 2015 two sections of State Route 180 received state scenic highway designations.</p> <p>The 2016 and 2017 APRs did not indicate whether any additional state highway</p>	

	<p>The 2013/2014 APR stated that program implementation had been delayed due to <i>“the lack of available funding.”</i></p> <p><b>2015 and 2016 APRs</b></p> <p>Unlike the 2013/2014 APR, the 2015, 2016 and 2017 APRs each stated that the program had been implemented.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“County staff collaborated with the Sierra Gateway Trust, Inc. and Caltrans in pursuit of a State Official Scenic Highway designation for segments of SR 180. Staff of the County and Caltrans with the Sierra Gateway Trust worked together to complete the Visual Assessment and Corridor Protection Program in support of a State Official Scenic Highway designation status for approximately 60.7 miles of the eastern segments of SR 180. On October 15, 2015, the Caltrans Director approved designation of the two sections of eastern SR 180 from the Alta Main Canal near Minkler to near the General Grant Grove section of Kings Canyon National Park, and the General Grant Grove section of Kings Canyon National Park to Kings Canyon National Park boundary near Cedar Grove as a State Scenic Highway.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 03-04 → Ongoing.</p>	<p>segments in Fresno County were eligible for scenic highway designation during those years.</p> <hr/> <p><b>Conclusion:</b></p> <p>Even though two sections of State Route 180 received state scenic highway designations in 2015, information provided by the County is insufficient to determine whether additional state highway segments in Fresno County are eligible for scenic highway designation and, if so, whether the County applied for that designation during 2016 or 2017.</p> <p><b>Evidence of the successful implementation of Program OS-L.B during 2017:</b></p> <p>Poor.</p>
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## 2000 HEALTH AND SAFETY ELEMENT

105	HS-A.A	<b>Deliverable:</b> Maintenance of local, state and federal agreements for coordinating disaster response.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County Office of Emergency Services had participated in a number of meetings with various agencies to maintain the County's agreements for coordinating disaster response.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"On November 14, 1995, the Fresno County Board of Supervisors adopted the State's Standardized Emergency Management System (SEMS), established the geographic area of the County of Fresno as the Fresno County Operational Area, and designated Fresno County as the Operational Area Lead Agency. In the County's role as the Operational Area lead agency, the County Office of Emergency Services (OES) maintains ongoing communication with local government agencies (County Departments, Incorporated Cities, Special Districts, and Public School Districts), as well as many State and Federal agencies and nonprofit organizations to maintain and enhance the communities capability to respond to and recover from disasters."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p style="color: red;">Modify program.</p> <p style="color: red;">Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2015, 2016 and 2017 APRs stated that In the County's role as the Operational Area lead agency for disaster response in Fresno County, the County's Office of Emergency Services (within the Department of Public Health) maintained ongoing communication with local, state and federal agencies, as well as with nonprofit organizations, to maintain the capability to respond to and recover from disasters.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program HS-A.A to focus on coordinating with cities, special districts and agencies to regularly update the Fresno County Multi-Jurisdictional Hazard Mitigation Plan.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County maintains local, state and federal agreements for coordinating disaster response.</p> <p><b>Evidence of the successful implementation of Program HS-A.A during 2017:</b></p> <p>Good.</p>
106	HS-A.B	<b>Deliverable:</b> Ongoing monitoring and periodic evaluation of the County's emergency planning, operations and training capabilities.	
		<b>County Reporting</b>	<b>League Reporting</b>

		<p><b>2002 APR</b></p> <p>The 2002 APR stated that the Office of Emergency Services had reviewed, updated and developed several aspects of the County’s emergency planning, operations and response services.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County Office of Emergency Services (OES) implements this program on an ongoing basis. OES is located within the Department of Public Health, Environmental Health Division and coordinates planning, preparedness, response and recovery efforts for disasters occurring within the unincorporated areas of Fresno County. Fresno County OES coordinates the development and maintenance of the Fresno County Operational Area Master Emergency Services Plan, which is updated periodically.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p>The County’s 2015, 2016 and 2017 APRs stated that the County Office of Emergency Services (within the Department of Public Health) coordinated the periodic update of the County’s Operational Area Master Emergency Services Plan.</p> <p>(It should be noted that no APR reported the year of the most recent update of the County’s Operational Area Master Emergency Services Plan or the future need to update the plan.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The County routinely monitors and evaluates County emergency planning, operations and training capabilities.</p> <p><b>Evidence of the successful implementation of Program HS-A.B during 2017:</b></p> <p>Good.</p>
107	HS-A.C	<p><b>Deliverable:</b> Ongoing periodic evaluation of County-owned safety and emergency management facilities and public utility systems for susceptibility to flood damage, seismic events or geological hazards.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Maintenance and Operations Division of the Department of Public Works and Planning continued to evaluate its Road Maintenance Area Yards for susceptibility to damage from flooding, seismic events or geological hazards.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County evaluated its facilities when concerns were raised by the occupying departments and that a more comprehensive inventory of existing facilities issues would occur in the future as budgeting and staffing permitted. The APRs did not state the degree to which the County had been able to complete an inventory of its facilities or the</p>



		<p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained a nearly identical appraisal of the implementation of the program. The appraisal from the 2017 APR is printed in full below:</p> <p><i>“The County Department of Internal Services evaluates County facilities in conjunction with concerns raised by the occupying department. Facility issues or any damage resulting from events are inspected with the assistance of Risk Management staff and qualified consultants or sub-consultants. Modifications, improvements or construction of new structures to replace existing facilities are also evaluated with the assistance of staff from the Department of Public Works and Planning. A more comprehensive inventory of existing facilities is targeted as budgeting and staffing permit.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p>extent to which the inventoried facilities would need to be modified.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County indicates that the County evaluates its facilities on an as-needed basis and that a lack of funding has prevented the County from completing a comprehensive evaluation of its safety and emergency management facilities and public utility systems for susceptibility to flood damage, seismic events or geological hazards.</p> <p><b>Evidence of the successful implementation of Program HS-A.C during 2017:</b></p> <p>Poor.</p>
108	HS-A.D	<p><b>Deliverable:</b> Ongoing operation of programs that inform the general public of emergency and disaster response procedures.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that In the 2001 calendar year, the County Office of Emergency Services (OES) conducted a broad-scale radio and television public information campaign to inform the public about general emergency preparedness, including power outages. The APR stated that OES provided disaster information and links to emergency planning and preparedness resources to the general public through its Human Services System website. In addition, OES provided press releases, press conferences, media interviews, and participated in public forums to provide information to the public on terrorism preparedness.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County Office of Emergency Services (within the Department of Public Health) coordinated planning and preparedness, as well as response and recovery efforts, for disasters occurring within the unincorporated area of the County.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County operates programs that inform the general public of emergency and disaster response procedures.</p> <p><b>Evidence of the successful implementation of Program HS-A.D during 2017:</b></p> <p>Good.</p>

		<p><i>“The County Office of Emergency Services (OES) implements this program on an ongoing basis. The County OES maintains contact and emergency information on the County’s website. The Fresno County Multi-Hazard Mitigation Plan provides additional details regarding County hazards and responses to mitigate damage or injury. In addition, the Public is also encouraged to obtain family and business preparedness information at websites maintained by The American Red Cross and FEMA.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>					
109	HS-B.A	<p><b>Deliverable:</b> As part of the building permit plan check process, review of the design of all buildings and structures to ensure that they are constructed to state and local standards.</p> <table border="1" data-bbox="321 793 979 1843"> <thead> <tr> <th data-bbox="321 793 979 884">County Reporting</th> <th data-bbox="979 793 1531 884">League Reporting</th> </tr> </thead> <tbody> <tr> <td data-bbox="321 884 979 1843"> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County had recently adopted California’s State Building Codes as part of Fresno County Ordinance Code Title 15. These codes provided minimum standards for safety in construction.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The Department of Public Works and Planning continues to review all proposed development to ensure it is designed and constructed to State and local regulations as part of the building permit and plan check process.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Ongoing → Ø</p> </td> <td data-bbox="979 884 1531 1843"> <p>The County’s 2015, 2016 and 2017 APRs stated that the County continued to review all proposed development to ensure it was designed and constructed to state and local construction standards.</p> <p>(It should be noted that the County has provided no justification for the recommended deletion of Program HS-B.A.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The County reviews the design of all buildings and structures to ensure that they are constructed to state and local standards as part of its building permit plan check process.</p> <p><b>Evidence of the successful implementation of Program HS-B.A during 2017:</b></p> <p>Good.</p> </td> </tr> </tbody> </table>	County Reporting	League Reporting	<p><b>2002 APR</b></p> <p>The 2002 APR stated that the County had recently adopted California’s State Building Codes as part of Fresno County Ordinance Code Title 15. These codes provided minimum standards for safety in construction.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The Department of Public Works and Planning continues to review all proposed development to ensure it is designed and constructed to State and local regulations as part of the building permit and plan check process.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Ongoing → Ø</p>	<p>The County’s 2015, 2016 and 2017 APRs stated that the County continued to review all proposed development to ensure it was designed and constructed to state and local construction standards.</p> <p>(It should be noted that the County has provided no justification for the recommended deletion of Program HS-B.A.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The County reviews the design of all buildings and structures to ensure that they are constructed to state and local standards as part of its building permit plan check process.</p> <p><b>Evidence of the successful implementation of Program HS-B.A during 2017:</b></p> <p>Good.</p>	
County Reporting	League Reporting						
<p><b>2002 APR</b></p> <p>The 2002 APR stated that the County had recently adopted California’s State Building Codes as part of Fresno County Ordinance Code Title 15. These codes provided minimum standards for safety in construction.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The Department of Public Works and Planning continues to review all proposed development to ensure it is designed and constructed to State and local regulations as part of the building permit and plan check process.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Ongoing → Ø</p>	<p>The County’s 2015, 2016 and 2017 APRs stated that the County continued to review all proposed development to ensure it was designed and constructed to state and local construction standards.</p> <p>(It should be noted that the County has provided no justification for the recommended deletion of Program HS-B.A.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The County reviews the design of all buildings and structures to ensure that they are constructed to state and local standards as part of its building permit plan check process.</p> <p><b>Evidence of the successful implementation of Program HS-B.A during 2017:</b></p> <p>Good.</p>						
110	HS-C.A	<p><b>Deliverable:</b> Ongoing participation in the federal Flood Insurance Program and the maintenance of flood hazard maps.</p>					

		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Development Engineering Section of the Maintenance and Operations Division maintained the most current Federal Emergency Management Act (<b>FEMA</b>) flood hazard maps and that the Division updated the information as new data/maps were released by FEMA.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The Department of Public Works and Planning maintains the most current FEMA flood hazard maps and updates the information as necessary or as new data / maps are released by FEMA. All submitted projects are reviewed to determine proximity to the 100-year floodplain during the grading permit process.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002, 2015, 2016 and 2017 APRs stated that the County maintained the most current FEMA flood hazard maps and participated in the federal Flood Insurance Program.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County participates in the federal Flood Insurance Program and maintains flood hazard maps.</p> <p><b>Evidence of the successful implementation of Program HS-C.A during 2017:</b></p> <p>Good.</p>
111	HS-C.B	<p><b>Deliverable:</b> Ongoing implementation of the County’s Floodplain Management Ordinance.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Development Engineering Section of the Maintenance and Operations Division enforced the County’s Floodplain Management Ordinance.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002, 2015, 2016 and 2017 APRs stated that the County continued to implement its Floodplain Management Ordinance and to regulate new development to prevent losses from flooding through the grading permit process.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend the General Plan by adding three new programs: (1) new Program HS-C.B to periodically update the County’s information on flooding, (2) new Program HS-C.D to periodically review and update the County’s</p>

		<p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The Department of Public Works and Planning reviews all submitted projects for conformance with floodplain requirements through the grading permit process.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: Ongoing → Ø</p> <p>Add new Program HS-C.B, which would read as follows:</p> <p><i>“The County shall with each revision of its Housing Element review and update as necessary the General Plan to include new flooding information not previously available, as required by with AB 162 (2007).”</i></p> <p>Add new Program HS-C.D, which would read as follows:</p> <p><i>“The County shall update and periodically review the Special Flood Hazard Areas provisions contained in the County Code to ensure adequate protection for structures located within identified flood zones.”</i></p> <p>Add new Program HS-C.E, which would read as follows:</p> <p><i>“The County shall prepare, maintain, and implement a Countywide Flood Emergency Plan that is consistent with the Fresno General Plan and city adopted general plans. The plan should be prepared in coordination with cities in Fresno County and address the requirements of Senate Bill 5.”</i></p>	<p>Special Flood Hazard Areas provisions in the County Code and (3) new Program HS-C.E to prepare, maintain and implement a countywide Flood Emergency Plan.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County implements its Floodplain Management Ordinance.</p> <p><b>Evidence of the successful implementation of Program HS-C.B during 2017:</b></p> <p>Good.</p>
112	HS-C.C	<p><b>Deliverables:</b> Ongoing review of dam failure evacuation plans.</p> <p>Ongoing dissemination of information on dam failure preparedness.</p>	
<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the program was ongoing and that during the following year the County Office of Emergency Services would renew work toward the completion of a draft Fresno County Operational Area Dam Failure Evacuation Plan Element. Work had been completed for a dam failure/public preparedness evacuation plan for Friant Dam, and a similar plan for Pine Flat Dam was to follow.</p>		<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the program had been implemented. However, the APRs did not indicate that the County provided public information on dam failure preparedness.</p> <p>The County published a community information pamphlet on flood hazards (dated September 14, 2012), but the pamphlet did not contain information on dam failure</p>	

		<p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“There are 23 dams within Fresno County that pose a significant risk to people and/or property. The Fresno County Office of Emergency Services has developed dam failure evacuation plans for each of these 23 dams. The Fresno County Multi-Hazard Mitigation Plan (2009) Section 4.2.9 evaluates dam failure in Fresno County. According to this document, there were 14 dam failures between 1976 and 1983, but all were earthen dams on private property. Although there remains a risk of dam failure in Fresno County, there have not been any failures of major dams.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p>preparedness. In addition, the County’s dam failure evacuation plans could not be found on the County’s website.</p> <hr/> <p><b>Conclusion:</b></p> <p>Even though the County has developed dam failure evacuation plans for 23 dams within Fresno County, the information provided by the County is insufficient to determine whether the County effectively disseminates that information to the public regarding dam failure preparedness.</p> <p><b>Evidence of the successful implementation of Program HS-C.C during 2017:</b></p> <p>Poor.</p>
113	HS-D.A	<p><b>Deliverables:</b> Regular review of information published by the California Division of Mines and Geology.</p> <p>Update of County maps and General Plan Background Report as needed.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Water, Geology, and Natural Resources Unit of the Planning Department regularly reviewed the State Mines and Geology website for the purpose of remaining current. The APR also stated that no mapping changes were required during 2002.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County reviews material published by the California Division of Mines and Geology and updates</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County reviewed material published by the California Division of Mines and Geology and updated County maps and the General Plan Background Report as necessary.</p> <p>In 1999, one year prior to the adoption of the 2000 General Plan, the County incorporated into Zoning Ordinance 858 the reclassification and mapping of sand and gravel regions within the county. Based on the fact that the County did not report any changes to Ordinance 858, the County’s geological maps or the General Plan Background Report, it may be assumed that no information had been received from the California Department</p>

		<p><i>the maps and the General Plan Background Report as necessary. Further, County staff actively engages with and discusses proposed mining projects with State Mining and Geology Board staff.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p>of Mines and Geology after 2000 to warrant the update of these documents.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County regularly reviews geological information published by the California Division of Mines and Geology and updates the County’s maps and General Plan Background Report accordingly.</p> <p><b>Evidence of the successful implementation of Program HS-D.A during 2017:</b></p> <p>Good.</p>
114	HS-D.B	<p><b>Deliverable:</b> Inventory of unreinforced masonry structures within unincorporated Fresno County constructed prior to 1948.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that a survey conducted in 1991 found there were no unreinforced masonry buildings in the unincorporated areas of Fresno County.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“A survey was conducted in 1991 to identify all unreinforced masonry buildings in the unincorporated areas of Fresno County. The survey did not identify any building to be below acceptable standards. Since unreinforced masonry buildings are not allowed within the unincorporated areas, this program will be deleted as part of the ongoing General Plan Review process.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Delete program.</p> <p>Change time frame: FY 02-04 → Ø</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002, 2015, 2016 and 2017 APRs stated that a survey conducted in 1991 did not identify any unreinforced masonry structures within unincorporated Fresno County. That being the case, it appears there may have been no need to include Program HS-D.B in the update of the General Plan in 2000.</p> <hr/> <p><b>Conclusion:</b></p> <p>This program need not have been adopted by the Board of Supervisors in 2000 because unincorporated areas of the County did not have any unreinforced masonry structures at that time.</p> <p><b>Evidence of the successful implementation of Program HS-D.B during 2017:</b></p> <p>Good. (No work required.)</p>

115	HS-D.C	<b>Deliverable:</b> Development of a public awareness program to aid in the identification and mitigation of unreinforced masonry structures.	
	<b>County Reporting</b>	<b>League Reporting</b>	
		<b>2002 APR</b>  The 2002 APR stated that since no unreinforced masonry buildings had been located within the unincorporated areas of the County, a public awareness program had not been developed.	The County's 2002, 2015, 2016 and 2017 APRs stated that the program was not needed because there were no unreinforced masonry buildings within unincorporated areas of the county.
		<b>2013/2014 APR</b>  The 2013/2014 APR did not report on this program.	This information was confirmed in a 2003 report to the California Legislature by the Seismic Safety Commission (SSC 2003-03) entitled <i>Status of the Unreinforced Masonry Building Law</i> . As such, it appears there may have been no need to include Program HS-D.C in the update of the General Plan in 2000.
		<b>2015, 2016 and 2017 APRs</b>  These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:  <i>"Because no unreinforced masonry buildings have been located within the unincorporated areas of the County, a public awareness program has not been developed."</i>	
		<b>Recommendations in the Draft 2017 Policy Document</b>  Delete program.  Change time frame: FY 02-03 → Ø	<hr/> <b>Conclusion:</b>  This program need not have been adopted by the Board of Supervisors in 2000 because unincorporated areas of the County did not have any unreinforced masonry structures at that time.
			<b>Evidence of the successful implementation of Program HS-D.C during 2017:</b>  Good. (No work required.)
116	HS-E.A	<b>Deliverable:</b> Referral of development projects within the Airport Review Area for review by the Fresno County Airport Land Use Commission.	
	<b>County Reporting</b>	<b>League Reporting</b>	
		<b>2002 APR</b>  The 2002 APR stated that all applicable plan amendments and rezones were referred to the Airport Land Use Commission.	The County's 2002, 2015, 2016 and 2017 APRs stated that all applicable land use applications were referred to the Airport Land Commission for evaluation, the results of which are forwarded to the Planning Commission and the Board of Supervisors.
		<b>2013/2014 APR</b>  The 2013/2014 APR did not report on this program.	<hr/>

		<p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“All applicable land use applications are referred to the Airport Land Use Commission (ALUC) that is administered by FCOG, for evaluation of consistency with the appropriate Airport Land Use Policy Plan. Recommendations of the ALUC are incorporated into staff’s evaluation and forwarded to the Planning Commission and the Board of Supervisors.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p><b>Conclusion:</b></p> <p>The County refers development projects within the Airport Review Area for review by the Fresno County Airport Land Use Commission.</p> <p><b>Evidence of the successful implementation of Program HS-E.A during 2017:</b></p> <p>Good.</p>
117	HS-F.A	<p><b>Deliverable:</b> Review of the reduction, storage and recycling of hazardous waste for discretionary uses which involve hazardous materials or generate hazardous wastes in regulated quantities.</p> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County conducted an assessment of the numbers and sizes of facilities that would be regulated and inspected under Policy HS-F.2 for hazardous materials handling and hazardous waste generation. This assessment was followed by a time task analysis that estimated the amount of staff time needed to properly implement the program. As a result, the 2002-2003 County budget allocated funds for addition staff positions to address the increased demand in services.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“The County Health Department continues to review discretionary uses that generate hazardous materials. The Department of Public Works and Planning routes discretionary permit applications to the Health Department for review and comment. Any proposed project that may generate hazardous material will be</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2002 APR stated that the County had hired additional staff to regulate and inspect the handling of hazardous materials and the generation of hazardous waste.</p> <p>The County’s 2015, 2016 and 2017 APRs stated that the County’s Environmental Health Department continued to review and recommend mitigation for discretionary uses that generated hazardous materials.</p> <p>It must be noted, however, that the APRs provided no evidence that the focus of the reviews was the reduction, storage and recycling of hazardous waste.</p> <hr/> <p><b>Conclusion:</b></p> <p>As part of its permitting process, the County reviews discretionary uses which involve hazardous materials or generate hazardous wastes in regulated quantities.</p>



		<p><i>required to comply with the recommended conditions or mitigation measures.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Retain time frame: Ongoing.</p>	<p><b>Evidence of the successful implementation of Program HS-F.A during 2017:</b></p> <p>Good.</p>
118	HS-F.B	<p><b>Deliverable:</b> Investigation of funding for site acquisition, development and operation of a permanent household waste facility.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the Resources Division of the Planning Department had secured a \$300,000 grant from the California Integrated Waste Management Board for the siting of a permanent household hazardous waste collection facility.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“On March 14, 2013 the County received Planning Commission approval to permit the establishment of a 15,000 square-foot household hazardous waste facility at the American Avenue Landfill. This Facility has since been constructed and is operational.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 01-02 → 2021-?.</p> <p>(The question mark in the time frame above is written in place of the year because that portion of the County’s Draft 2017 Policy Document is unreadable.)</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2015, 2016 and 2017 APRs stated that a site for a permanent household waste facility had been acquired and that the facility had been constructed and was in operation.</p> <p>For this reason, it was unnecessary for the County to propose (through its December 2017 draft of the Policy Document) to extend the time frame for implementation of Program HS-F.B from fiscal year 2001-2002 to calendar year 2021 and beyond.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County investigated funding for site acquisition, development and operation of a permanent household waste facility. As a result, the facility has been constructed and is in operation.</p> <p><b>Evidence of the successful implementation of Program HS-F.B during 2017:</b></p> <p>Good.</p>
119	HS-F.C	<p><b>Deliverable:</b> Review of plans to mitigate soil or groundwater contamination from hazardous waste for redevelopment and infill projects.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p>	<p style="text-align: center;"><b>League Reporting</b></p>

		<p><b>2002 APR</b></p> <p>The 2002 APR stated that the County was implementing its Contaminated Site Oversight Program for the remediation of contaminated properties due to the use of underground storage tanks and that during the following year, the County planned to assess the draft Response Action Regulations developed for the remediation of contamination from activities other than underground storage tanks.</p> <p>To avoid future environmental problems, the Development Services Department was checking new construction plans to verify (1) the required horizontal separation between onsite sewage disposal systems and the sources of domestic water supplies and (2) the required vertical separation between disposal fields and the water table.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR did not report on this program.</p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“Development projects are referred to Environmental Health for review and comments. If the subject site is identified as a contaminated site, Environmental Health recommends mitigation measures to address soil or groundwater contamination. Further, as part of the environmental review process, staff has the ability to access State and Federal databases for contaminated sites and can apply appropriate mitigation to discretionary land use projects via comments from State, Federal or local agencies.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Modify program.</p> <p>Retain time frame: Ongoing.</p>	<p>The County’s 2015, 2016 and 2017 APRs stated that the County’s Environmental Health Department reviewed and recommended mitigation for all development projects on sites identified as contaminated with hazardous waste.</p> <p>The County has proposed (through its December 2017 draft of the Policy Document) to amend Program HS-F.C to read that in order to mitigate soil and groundwater contamination, the County will shift from reviewing plans to coordinating with the Regional Water Quality Board to accomplish the same. Importantly, this change may result in less focus on the mitigation of soil contamination from hazardous waste for redevelopment and infill projects, as the mission of the State of California Central Valley Regional Water Quality Control Board is not to protect soil quality per se, but rather to “<i>preserve, enhance, and restore the quality of California’s water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations.</i>”</p> <hr/> <p><b>Conclusion:</b></p> <p>As part of the permitting process for redevelopment and infill projects, the County requires mitigation of contamination caused by hazardous waste.</p> <p><b>Evidence of the successful implementation of Program HS-F.C during 2017:</b></p> <p>Good.</p>
120	HS-G.A	<p><b>Deliverable:</b> Amendment of the Noise Ordinance, as necessary, to ensure conformity with the General Plan.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2002 APR</b></p> <p>The 2002 APR stated that the County approved an amendment to the County’s Noise Ordinance that</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The 2002 APR stated that the County had yet to yet to review it Noise Ordinance to</p>

	<p>clarified that property owners were liable for noise violations occurring on their properties.</p> <p>The APR also stated that the County's Noise Ordinance would be evaluated to determine if additional amendments were necessary to bring the Noise Ordinance into consistency with the General Plan.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that program implementation had been delayed due to <i>"the lack of available funding."</i></p> <p><b>2015 and 2016 APRs</b></p> <p>Unlike the 2013/2014 APR, the 2015 and 2016 APRs stated that the program had been implemented. (The 2017 APR did not state that the program had been implemented.)</p> <p><b>2015, 2016 and 2017APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>"The County Environmental Health Division will continue to enforce the Fresno County Noise Ordinance and amend its policies as necessary. Discretionary land use permits which may generate excessive noise levels are often required to complete a noise analysis, and proposals within designated noise areas of airports are evaluated or limited to avoid conflicts with General Plan noise standards."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Change time frame: FY 01-02 → 2021-?.</p> <p>(The question mark in the time frame above is written in place of the year because that portion of the County's Draft 2017 Policy Document is unreadable.)</p>	<p>determine if changes were needed to bring the ordinance into compliance with the General Plan as updated in 2000.</p> <p>The County's 2015, 2016 and 2017 APRs did not state that the County had amended the Noise Ordinance to ensure conformity with the General Plan.</p> <p>Since the 2013/2014 APR reported that the program had not been initiated by that year and since the 2015 APR reported that the program had been implemented, it may be assumed that the County evaluated the Noise Ordinance to ensure conformity with the General Plan sometime during 2015. An electronic search using the keyword "noise" for all of the 2015 meeting agendas the Board of Supervisors did not yield any agenda item regarding the evaluation of the Noise Ordinance.</p> <p>(It should be noted that even though the County's 2013/2014, 2015 and 2016 APRs stated that the Program HS-G.A had been implemented, the County has proposed through its December 2017 draft of the Policy Document to amend the time frame for accomplishing Program HS-G.A from FY 01-02 to calendar year 2021 or beyond.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to show that the County amended its Noise Ordinance to ensure conformity with the update of the General Plan in 2000.</p> <p><b>Evidence of the successful implementation of Program HS-G.A during 2017:</b></p> <p>None.</p>
121	HS-G.B	<p><b>Deliverable:</b> Development of a noise control program that includes...</p> <ul style="list-style-type: none"> <li>(a) An ordinance defining effective noise control and exemptions, setting forth monitoring methodology and delineating enforcement and abatement procedures.</li> <li>(b) A public information program to inform county residents of the impact of noise on their lives.</li> </ul>

	<p style="text-align: center;"><b>County Reporting</b></p>	<p style="text-align: center;"><b>League Reporting</b></p>
	<p><b>2002 APR</b></p> <p>The 2002 APR stated that during the following year the Environmental Health System intended to work with the Department of Public Works and Planning to update the Health and Social Services website to include information regarding community noise.</p> <p><b>2013/2014 APR</b></p> <p>The 2013/2014 APR stated that program implementation had been delayed due to <i>“the lack of available funding.”</i></p> <p><b>2015 and 2016 APRs</b></p> <p>The 2015 and 2016 APRs contained this statement:</p> <p><i>“A Noise Control Program has not been developed.”</i></p> <p><b>2015, 2016 and 2017 APRs</b></p> <p>These APRs contained an identical appraisal of the implementation of the program. That appraisal is printed in full below:</p> <p><i>“All land use projects are evaluated for potential noise impacts as required by the California Environmental Quality Act (CEQA) and appropriate mitigation measures are incorporated as necessary. As stated in response to HS-G.A above, staff coordinates with the Health Department regarding discretionary land use permits, and additional evaluation may be required for excessive noise-generating uses. However, a noise control program that addresses all components of this Implementation Program has not been developed.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>Retain program as is.</p> <p>Time frame change: FY 01-02 → 2021-?.</p> <p>(The question mark in the time frame above is written in place of the year because that portion of the County’s Draft 2017 Policy Document is unreadable.)</p>	<p>The County’s 2015 and 2016 APRs stated that the County had not developed a noise control program.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County has not developed a noise control program.</p> <p><b>Evidence of the successful implementation of Program HS-G.B during 2017:</b></p> <p>None.</p>

## Appendix B

### 2017 APR — IMPLEMENTATION OF THE GENERAL PLAN HOUSING ELEMENT

California Government Code Section 65400 requires that once an agency has adopted a general plan, it must provide to the state an annual report (**APR**) on progress made in implementing the plan.

“California Government Code Section 65400

*(a) After the legislative body has adopted all or part of a general plan, the planning agency shall do...the following:*

*⋮*

*(2) Provide by April 1 of each year an annual report to the legislative body, the Office of Planning and Research, and the Department of Housing and Community Development that includes all of the following:*

*(A) The status of the plan and progress in its implementation.*

*(B) The progress in meeting its share of regional housing needs....*

*The housing element portion of the annual report, as required by this paragraph, shall be prepared through the use of standards, forms, and definitions adopted by the Department of Housing and Community Development....The housing element portion of the annual report shall include a section that describes the actions taken by the local government towards completion of the programs and status of the local government’s compliance with the deadlines in its housing element.”*

California Government Code of Regulations Section 6203 lists the required components of annual progress reports evaluating housing elements. Below is a portion of that code.

California Government Code of Regulations, Title 25, Division 1, Chapter 6, Subchapter 2. §6203.

*“Each annual report shall contain the following information:*

*(e) For each program identified in the housing element...:*

*(4) Status of program implementation as of the end of the annual reporting period **listing dates of specific milestones or accomplishments, and quantified to the extent applicable and possible....”***

In addition, in its instructions to local agencies, the Department of Housing and Community Development mandates that local agencies “*detail the progress in implementing all specific programs and policies.*” In other words, state law requires a comprehensive and thorough assessment of the progress made toward implementing housing programs and policies.

The County’s 2015-2023 Housing Element contains 19 programs which are further divided into 63 “*objectives.*” These objectives are not goals; they are, instead, program tasks. For example, printed below is the first objective (program task) listed in the 2015-2023 Housing Element.

Housing H-1.1: “*The County of Fresno Public Works and Planning Department, with assistance of the Fresno COG, will take the lead in coordinating the Countywide Fifth Cycle Housing Element Committee meetings.*”

## Program Numbering

Although the 19 programs in the Housing Element are numbered 1 through 19, the 63 objectives within them are bulleted — not identified either by letter or number. Therefore, it has been necessary to assign each an identifying number as follows: the first objective of the first program in the Housing Element has been labeled *H-1.1*, the second objective in the first program *H-1.2* and so on.

To make reference quick and easy, each of the 63 objectives was assigned a number from 122 to 184, the numbers 1 – 121 having been applied to the 121 programs in the other six elements of the General Plan.

## Methodology for Assessing Implementation

As explained previously on page 25 of this report, to help focus attention on the essential features of individual objectives, each objective is rewritten as a *deliverable*. Doing so enables the reader to hone in on the degree to which the County has been able to implement all aspects of the various programs.

The example below shows Housing Program Objective H-8.3 rewritten as a set of deliverables. The original text from the General Plan is at the left; the set of deliverables at the right.

### Full Text of Housing Program Objective H-8.3

*“Annually monitor the status of farmworker housing as part of the County’s annual report to HCD on Housing Element progress and evaluate if County efforts are effective in facilitating the provision of farmworker housing. If appropriate, make necessary changes to enhance opportunities and incentives for farmworker housing development.”*

### Objective H-8.3 Expressed as Deliverables

1. Annual monitoring of the status of farmworker housing.
2. Annual evaluation of the effectiveness of the County’s efforts to facilitate the provision of farmworker housing.

Because the County’s 2015-2023 Housing Element is fairly new, the assessment of the success of program implementation is based on the most recent year, i.e., on implementation information provided by the County for calendar year 2017 alone.

## Content of the Annual Housing Report

Generally speaking, state law gives counties a great deal of latitude on how they format their APRs, but that’s not so for reporting on the implementation of housing elements. The housing section of the APR must be completed using five forms (tables) provided by the Department of Housing and Community Development. Below is a description of the content of each of these tables.

Table A Building activity summary of new construction for lower income residents.

Table A2 Building activity summary of the rehabilitation of existing housing units.

Table A3 Building activity summary of new construction for moderate income residents.

Table B Progress in meeting the County’s Regional Housing Needs Allocation (RHNA).

Table C Progress in implementing programs in the County’s Housing Element.

County planning staff completed the five tables and sent them to the state as part of its 2017 APR. The County’s completed tables for 2017 are reproduced below on pages 180 and 181. (The reader will note on page 181 that Table C is left blank. This is acceptable because the County prepared Appendix B in lieu of completing Table C.)




## Portion of the County's Housing Report Reviewed by the League of Women Voters of Fresno

The League did not check the accuracy of the housing data provided by the County for Tables A, A2, A3 and B, as there was no way to do so.

The League limited its evaluation to the information supplied by the County to Table C, which was a report of the progress made in implementing the 63 program objectives in the County's 2015-2023 Housing Element. (See Appendix B, pp. 137-181.)

### League's Report on Program Implementation

Once available information from the County's 2017 APR has been reviewed, each program objective was color tagged as follows:

-  Good evidence of successful implementation.
-  Poor evidence of successful implementation.  
Only partial evidence of implementation.
-  No evidence by which to confirm successful implementation.  
Evidence that implementation was delayed or not implemented per directives in the plan.

The League has created a four-column chart, titled *Appendix B*, which evaluates County progress toward implementing the 63 objectives in the Housing Element.

That chart, beginning on the next page, contains these four columns.

- Column 1: Individual numbering of each program objective from 122 to 184 with a color tag indicating the degree of successful implementation.
- Column 2: New identification labels applied to each program objective (e.g., H-1.1, H-1.2).
- Column 3: The success of implementation as described in the County's 2017 APR.
- Column 4: The success of implementation as described by the League.

It should be noted that the 121 implementation programs in the first six elements of the General Plan, unlike programs in the Housing Element, lack program objectives, which makes the evaluation of each of those 121 programs a somewhat simpler task.

The Housing Element is different. Each of the 19 programs in the Housing Element has as few as one or as many as eight objectives. Altogether, the Housing Element has 63 objectives.

Because the County's 2017 report on its Housing Element evaluated the 19 programs in the aggregate and did not comment individually on each objective, in reviewing the County's 2017 APR, it was difficult, at times, to determine with confidence the degree to which the County was able to report successful implementation of individual objectives.

Even so, it was possible to determine with near certainty that the County's 2017 APR did not comment at all on the implementation of these nine program objectives: H-3.5, H-5.2, H-7.2, H-8.3, H-17.2, H-17.3, H-18.3, H-18.5 and H-19.4.)

## APPENDIX B

### PROGRESS TOWARD IMPLEMENTATION OF THE 63 PROGRAM OBJECTIVES LISTED IN THE HOUSING ELEMENT

**2015 – 2023 HOUSING ELEMENT**

## Regional Collaboration

### Program 1: Regional Collaboration on Housing Opportunities

<b>122</b>	<b>H-1.1</b>	<p><b>Deliverable:</b> Evidence of the Planning Department taking the lead in coordinating the Countywide Fifth Cycle Housing Element Committee meetings.</p>	
	<b>County Reporting</b>	<b>League Reporting</b>	
		<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 1.1 is printed in full below:</p> <p><i>“Staff of the local governments who participated in the Fifth-Cycle Update met biannually in 2017 to discuss implementation of the housing element and regional housing issues.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the staffs of local governments participating in the Fifth-Cycle Update of the Multi-jurisdictional Housing Element met twice in 2017. The 2017 APR did not indicate that the County took the lead in coordinating those meetings.</p> <p>(It should be noted that there does not appear to be a County public record of the proceedings of those meetings.)</p> <hr style="width: 20%; margin-left: auto; margin-right: 0;"/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has taken the lead in coordinating the Countywide Fifth Cycle Housing Element Committee meetings.</p> <p><b>Evidence of the successful implementation of Program H-1.1 during 2017:</b></p> <p>Poor.</p>



123	H-1.2	<b>Deliverable:</b> Ongoing collaboration on housing program implementation and regional issues as part of the Countywide Housing Element Technical Committee.	
	<b>County Reporting</b>  <b>2017 APR</b>  The County's 2017 APR appraisal of the implementation of Program Objective 1.2 was identical to that for Program Objective 1.1.  The County's 2017 appraisal of the implementation of Program Objective 1.1 is reprinted in full below:  <i>"Staff of the local governments who participated in the Fifth-Cycle Update met biannually in 2017 to discuss implementation of the housing element and regional housing issues."</i>  <b>Recommendations in the Draft 2017 Policy Document</b>  None.	<b>League Reporting</b>  At the time of the Board of Supervisors' adoption of the fifth cycle of the Housing Element on March 15, 2016, the Countywide Housing Element Technical Committee consisted of 19 people representing the County and 12 of the county's 15 cities.  The County's 2017 APR stated that the staffs of local governments participating in the Fifth-Cycle Update of the Multi-jurisdictional Housing Element met twice in 2017.  (It should be noted that there does not appear to be a County public record of the proceedings of those meetings.)  <hr style="width: 20%; margin-left: auto; margin-right: auto;"/> <b>Conclusion:</b>  Information provided by the County is insufficient to understand the extent to which the County has collaborated on housing program implementation and regional housing issues.  <b>Evidence of the successful implementation of Program H-1.2 during 2017:</b>  Poor.	
124	H-1.3	<b>Deliverable:</b> At least biannually, meetings of the Countywide Housing Element Technical Committee to evaluate the implementation of programs and to identify any additional housing needs.	
	<b>County Reporting</b>  <b>2017 APR</b>  The County's 2017 APR appraisal of the implementation of Program Objective 1.3 was identical to that for Program Objective 1.1.  The County's 2017 appraisal of the implementation of Program Objective 1.1 is reprinted in full below:	<b>League Reporting</b>  At the time of the Board of Supervisors' adoption of the fifth cycle of the Housing Element on March 15, 2016, the Countywide Housing Element Technical Committee consisted of 19 people representing the County and 12 of the county's 15 cities.	

		<p><i>“Staff of the local governments who participated in the Fifth-Cycle Update met biannually in 2017 to discuss implementation of the housing element and regional housing issues.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County’s 2017 APR stated that the staffs of local governments participating in the Fifth-Cycle Update of the Multi-jurisdictional Housing Element met twice in 2017.</p> <p>(It should be noted that there does not appear to be a County public record of the proceedings of those meetings.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has evaluated the implementation of housing programs and identified additional housing needs.</p> <p><b>Evidence of the successful implementation of Program H-1.3 during 2017:</b></p> <p>Poor.</p>
125	H-1.4	<p><b>Deliverable:</b> Annual meeting of the Countywide Housing Element Technical Committee with the California Department of Housing and Community Development (HCD) and other agencies to discuss funding opportunities and challenges with program implementation.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County’s 2017 appraisal of the implementation of Program Objective 1.4 is printed in full below:</p> <p><i>“Staff of the participating local governments also met with representatives of the California Department of Housing and Community Development (HCD) to discuss funding opportunities and challenges in implementing their programs.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>At the time of the Board of Supervisors’ adoption of the fifth cycle of the Housing Element on March 15, 2016, the Countywide Housing Element Technical Committee consisted of 19 people representing the County and 12 of the county’s 15 cities.</p> <p>The County’s 2017 APR stated that the staffs of local governments participating in the Fifth-Cycle Update of the Multi-jurisdictional Housing Element met with the California Department of Housing and Community Development to discuss funding opportunities and challenges in implementing their programs.</p> <p>(It should be noted that there does not appear to be a County public record of the proceedings of such meetings.)</p> <hr/>

			<p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has discussed with the California Department of Housing and Development funding opportunities and the challenges of program implementation.</p> <p><b>Evidence of the successful implementation of Program H-1.4 during 2017:</b></p> <p>Poor.</p>				
126	H-1.5	<p><b>Deliverable:</b> Periodic meetings of the Countywide Housing Element Technical Committee with Fair Housing of Central California to discuss fair housing issues and opportunities for education.</p>	<table border="1"> <thead> <tr> <th data-bbox="979 688 979 693">County Reporting</th> <th data-bbox="979 688 1531 693">League Reporting</th> </tr> </thead> <tbody> <tr> <td data-bbox="321 693 979 1906"> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 1.5 is printed in full below:</p> <p><i>“Staff of the participating local governments met with staff of Fair Housing of Central California to discuss fair housing issues and opportunities for education.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p> </td> <td data-bbox="979 693 1531 1906"> <p>At the time of the Board of Supervisors' adoption of the fifth cycle of the Housing Element on March 15, 2016, the Countywide Housing Element Technical Committee consisted of 19 people representing the County and 12 of the county's 15 cities.</p> <p>The County's 2017 APR stated that the staffs of local governments participating in the Fifth-Cycle Update of the Multi-jurisdictional Housing Element met with the Fair Housing Council of Central California.</p> <p>(It should be noted that there does not appear to be a County public record of the proceedings of such meetings.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has discussed fair housing issues and opportunities for education with the Fair Housing Council of Central California.</p> <p><b>Evidence of the successful implementation of Program H-1.5 during 2017:</b></p> <p>Poor.</p> </td> </tr> </tbody> </table>	County Reporting	League Reporting	<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 1.5 is printed in full below:</p> <p><i>“Staff of the participating local governments met with staff of Fair Housing of Central California to discuss fair housing issues and opportunities for education.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>At the time of the Board of Supervisors' adoption of the fifth cycle of the Housing Element on March 15, 2016, the Countywide Housing Element Technical Committee consisted of 19 people representing the County and 12 of the county's 15 cities.</p> <p>The County's 2017 APR stated that the staffs of local governments participating in the Fifth-Cycle Update of the Multi-jurisdictional Housing Element met with the Fair Housing Council of Central California.</p> <p>(It should be noted that there does not appear to be a County public record of the proceedings of such meetings.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has discussed fair housing issues and opportunities for education with the Fair Housing Council of Central California.</p> <p><b>Evidence of the successful implementation of Program H-1.5 during 2017:</b></p> <p>Poor.</p>
County Reporting	League Reporting						
<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 1.5 is printed in full below:</p> <p><i>“Staff of the participating local governments met with staff of Fair Housing of Central California to discuss fair housing issues and opportunities for education.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>At the time of the Board of Supervisors' adoption of the fifth cycle of the Housing Element on March 15, 2016, the Countywide Housing Element Technical Committee consisted of 19 people representing the County and 12 of the county's 15 cities.</p> <p>The County's 2017 APR stated that the staffs of local governments participating in the Fifth-Cycle Update of the Multi-jurisdictional Housing Element met with the Fair Housing Council of Central California.</p> <p>(It should be noted that there does not appear to be a County public record of the proceedings of such meetings.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has discussed fair housing issues and opportunities for education with the Fair Housing Council of Central California.</p> <p><b>Evidence of the successful implementation of Program H-1.5 during 2017:</b></p> <p>Poor.</p>						

127	H-1.6	<b>Deliverable:</b> Evidence of the Countywide Housing Element Technical Committee advocating on behalf of the Fresno County region for grant funding for affordable housing and infrastructure improvements.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 APR appraisal of the implementation of Program Objective 1.6 was identical to that for Program Objective 1.4.</p> <p>The County's 2017 appraisal of the implementation of Program Objective 1.4 is reprinted in full below:</p> <p><i>"Staff of the participating local governments also met with representatives of the California Department of Housing and Community Development (HCD) to discuss funding opportunities and challenges in implementing their programs."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>At the time of the Board of Supervisors' adoption of the fifth cycle of the Housing Element on March 15, 2016, the Countywide Housing Element Technical Committee consisted of 19 people representing the County and 12 of the county's 15 cities.</p> <p>The County's 2017 APR stated that the staffs of participating of local governments met with the California Department of Housing and Community Development to discuss funding opportunities and challenges in implementing their programs.</p> <p>(It should be noted that there does not appear to be a County public record of the proceedings of such meetings.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has advocated on behalf of the Fresno County region for grant funding for affordable housing and infrastructure improvements.</p> <p><b>Evidence of the successful implementation of Program H-1.6 during 2017:</b></p> <p>Poor.</p>
128	H-1.7	<b>Deliverable:</b> Search for partnerships with other jurisdictions, agencies, housing developers, community stakeholders, and agricultural employers/employees to explore options for increasing the availability of farmworker housing.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 1.7 is printed in full below:</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the staffs participating in the Fifth-Cycle Update of the Multi-jurisdictional Housing Element had</p>

	<p><i>“Staff of the participating local governments seek opportunity to partner with other jurisdictions in the region and other agencies to explore viable options for increasing the availability of farmworker housing in suitable locations in the region on an ongoing basis.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>engaged in a search for partnerships with other jurisdictions, agencies, housing developers, community stakeholders, and agricultural employers/employees to explore options for increasing the availability of farmworker housing.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has searched for partnerships with other jurisdictions, agencies, housing developers, community stakeholders, and agricultural employers/employees to explore options for increasing the availability of farmworker housing.</p> <p><b>Evidence of the successful implementation of Program H-1.7 during 2017:</b></p> <p>Poor.</p>
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**Program 2: Review Annexation Standards in Memorandums of Understanding**

129	H-2.1	<p><b>Deliverable:</b> Evidence that the County is working with the county’s 15 cities during the Housing Element planning period to review and revise the standards for annexation contained in the memorandums of understanding between the County and the cities.</p>	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County’s 2017 appraisal of the implementation of Program Objective 2.1 is printed in full below:</p> <p><i>“In the calendar year of 2017, Fresno County and City of Reedley staff worked together and proposed an amendment to the MOU between the County and the City of Reedley which was approved by the Board of Supervisors on September 26, 2017. The amendment, among other things, revised Exhibit ‘A’ - Standards of Annexation of the MOU to include the following provision to the list of acceptable annexations:</i></p> <p><i>The annexation is to fulfill the City’s Regional Housing Needs Allocation (RHNA) obligation which otherwise cannot be accommodated on lands currently within the city’s incorporated boundary.</i></p> <p><i>The County will work with other cities in the County for any proposed revision to the Standards for Annexation</i></p>	<p><b>League Reporting</b></p> <p>The County’s 2017 APR stated that during 2017, the County worked to revise the County’s Memorandum of Understanding (<b>MOU</b>) with the City of Reedley to include provisions that would enable the city to meet its Regional Housing Needs Allocation.</p> <p>The APR also stated that the MOUs with the other 14 cities within the county would be similarly revised either at the time of MOU renewal or by special request from particular cities.</p> <p>The 2017 APR did not state which MOUs were in need of revision or when such revisions were likely to take place.</p> <hr/>

	<p>contained in the Memorandum of Understanding (MOU) either at the time of renewal of MOUs or upon a request by a city.”</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>Conclusion:</b></p> <p>The County is working with the county’s 15 cities to review and revise the standards for annexation contained in their respective MOUs.</p> <p><b>Evidence of the successful implementation of Program H-2.1 during 2017:</b></p> <p>Good.</p>
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**Program 3: Adequate Sites Program**

130	H-3.1	<p><b>Deliverable:</b> Completion of General Plan and Zoning Ordinance technical amendments in 2016 to achieve internal consistency.</p>	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County’s 2017 appraisal of the implementation of Program Objective 3.1 is printed in full below:</p> <p><i>“The General Plan Review and Zoning Ordinance Update projects are moving forward. The public review draft of the General Plan documents and the Zoning Ordinance have been released for public review and the project is anticipated to be completed in 2019.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>With respect to allowable housing densities, the County’s 2015-2023 Housing Element stated that there were technical inconsistencies between the General Plan and the Zoning Ordinance.</p> <p>The 2015-2023 Housing Element also reported that technical inconsistencies existed between the General Plan and the Zoning Ordinance and that the County’s practice was to honor allowable densities in the Zoning Ordinance if requested by project applicants.</p> <p>The 2017 APR also stated that internal consistency would be achieved in 2019, although the County originally anticipated that the lack of internal consistency would be resolved by 2016.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County’s effort to make the Zoning Ordinance consistent with the 2000 update of the General Plan began in late 2005, and after 13 years, that work is still unfinished. The effort to bring the Zoning Ordinance into compliance with the 2015-2023 Housing was to have been completed by 2016, and it also unfinished.</p>

			<p><b>Evidence of the successful implementation of Program H-3.1 during 2017:</b></p> <p>Poor.</p>
131	H-3.2	<p><b>Deliverable:</b> Annual update of the inventory of residential land resources.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 3.2 is printed in full below:</p> <p><i>"The County monitors inventory of lands identified in the Housing Element to accommodate County's Fifth-Cycle RHNA allocations. County staff monitors database to ensure changes to land use designations , annexations, or other proposed removal of land identified in the inventory does not diminish land identifies [sic] in the inventory to accommodate County's Fifth-Cycle RHNA obligations."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County was monitoring the inventory of lands identified in the Housing Element to accommodate the County's RHNA allocations.</p> <p>The 2017 APR contained an update of that inventory.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County annually updates its inventory of residential land resources.</p> <p><b>Evidence of the successful implementation of Program H-3.2 during 2017:</b></p> <p>Good.</p>
132	H-3.3	<p><b>Deliverable:</b> Monitoring of changes in the inventory of residential land resources to ensure the County has remaining capacity consistent with its share of the regional housing needs.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 3.3 was identical to that for Program Objective 3.2.</p> <p>The County's 2017 appraisal of the implementation of Program Objective 3.2 is reprinted in full below:</p> <p><i>"The County monitors inventory of lands identified in the Housing Element to accommodate County's Fifth-Cycle RHNA allocations. County staff monitors database to ensure changes to land use designations , annexations, or other proposed removal of land identified in the inventory does not diminish land identifies [sic] in the</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County was monitoring the inventory of lands identified in the Housing Element to accommodate the County's RHNA allocations.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County monitors changes in the inventory of residential land resources to ensure the County has remaining capacity</p>

		<p><i>inventory to accommodate County's Fifth-Cycle RHNA obligations."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>consistent with its share of the regional housing needs.</p> <p><b>Evidence of the successful implementation of Program H-3.3 during 2017:</b></p> <p>Good.</p>
133	H-3.4	<p><b>Deliverable:</b> Ongoing designation and zoning of adequate sites to meet special housing needs as specified in the County's Regional Housing Needs Allocation (HRNA).</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 3.4 is printed in full below:</p> <p><i>"The County continues to designate and zone adequate sites to meet special housing needs as needed."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County continued to designate and zone adequate sites to meet special housing needs as needed.</p> <p>Special needs groups include homeless persons, single-parent households, the elderly, persons with disabilities, farmworkers, and large families.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to provide housing for special needs groups; however, Program H-3.4 only requires the County to designate and zone sites sufficient in number to meet the special housing needs allocation specified in the County's RHNA.</p> <p><b>Evidence of the successful implementation of Program H-3.4 during 2017:</b></p> <p>Good.</p>
134	H-3.5	<p><b>Deliverable:</b> Ongoing encouragement of a variety of housing types for all income levels, as well as higher density housing through implementation of the General Plan and community plans, through mechanisms encouraging affordability and by promoting active transportation and access to services and amenities within existing communities.</p>	
		<p><b>County Reporting</b></p>	<p><b>League Reporting</b></p>



		<p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 3.5.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the 2017 APR did not comment on this program objective, there is no information to indicate that the County encourages a variety of housing types for all income levels, as well as higher density housing.</p> <p><b>Evidence of the successful implementation of Program H-3.5 during 2017:</b></p> <p>None.</p>
135	H-3.6	<p><b>Deliverable:</b> Evidence of directing interested residential developers to community plan and specific plan areas where amenities are or can be located and where water and sewer service providers have or can provide capacity and potential for the expansion of infrastructure.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 3.6 is printed in full below:</p> <p><i>"The County continues to direct interested residential developers, especially affordable housing developers throughout the County, to Community Plan and Specific Plan areas where amenities are or can be located and where water and sewer service providers have or can provide capacity to accommodate developments."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County was directing interested residential developers to community plan and specific plan areas where amenities were or could be located and where water and sewer service providers had or could provide infrastructure capacity.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has directed interested residential developers to areas where water and sewer services are located or can be located.</p> <p><b>Evidence of the successful implementation of Program H-3.6 during 2017:</b></p> <p>Poor.</p>

136	H-3.7	<p><b>Deliverables:</b> Meeting(s) with developers to discuss constraints and opportunities on Trailer Park (TP) zoned sites.</p> <p>By 2017, the establishment of incentives, procedures or other mechanisms to promote development of TP zoned sites.</p>	
	<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 3.7 is printed in full below:</p> <p><i>"The County will meet with interested developers to discuss constraints and opportunities on TP zoned sites and address constraints and establish incentives, procedures or other mechanism on continual basis to promote development."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County would — at a future date — meet with developers to discuss constraints and opportunities on Trailer Park (TP) zoned sites and establish incentives, procedures or other mechanisms to promote development of TP zoned sites.</p> <p>(It should be noted that while the County's 2017 APR stated that the County would meet with "interested" developers, the program itself stated that the County would meet with developers generally, whether or not they had expressed an interest in TP zoning.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The County's 2017 APR indicates that Program H-3.7 has not been initiated.</p> <p><b>Evidence of the successful implementation of Program H-3.7 during 2017:</b></p> <p>None.</p>	
137	H-3.8	<p><b>Deliverable:</b> Participation in the development of the next Regional Housing Needs Allocation (RHNA) Plan.</p>	
	<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 3.8 is printed in full below:</p> <p><i>"The County will participate in the development of the next RHNA Plan to ensure that the allocations are reflective of the County's General Plan policies and are realistic based on land use patterns in the unincorporated areas of the County."</i></p>	<p><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County would participate in the development of the next Regional Housing Needs Allocation (RHNA) Plan, which was expected to be approved sometime around 2023.</p> <hr/>	

		<p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>Conclusion:</b></p> <p>A revision of the County’s RHNA Plan is not due until 2023. The County will be a participant at that planning effort.</p> <p><b>Evidence of the successful implementation of Program H-3.8 during 2017:</b></p> <p>Good.</p>
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**Program 4: Monitoring of Residential Capacity (No Net Loss)**

138	H-4.1	<p><b>Deliverable:</b> By 2016, development and implementation of a formal evaluation procedure pursuant to Government Code Section 65863 to ensure sufficient residential capacity (at all times) to meet the County’s Regional Housing Needs Allocation (RHNA).</p>	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County’s 2017 appraisal of the implementation of Program Objective 4.1 is printed in full below:</p> <p><i>“The County monitor [sic] its inventory of vacant sites available for residential developments on an ongoing basis to ensure sufficient lands are available to accommodate the County’s share of the Fifth-Cycle RHNA allocations.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County’s 2017 APR stated that the County was monitoring its inventory of vacant sites available for residential development.</p> <p>Program H-4.1 required the County to develop a formal evaluation procedure pursuant to Government Code Section 65863 to ensure sufficient residential capacity to meet the County’s Regional Housing Needs Allocation (RHNA).</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County’s 2017 APR to support a conclusion that the County has developed a formal evaluation procedure to ensure sufficient residential capacity to meet the County’s RHNA.</p> <p><b>Evidence of the successful implementation of Program H-4.1 during 2017:</b></p> <p>None.</p>
139	H-4.2	<p><b>Deliverable:</b> Annual monitoring of the effectiveness of non-residential zones to facilitate residential development.</p>	
		<p><b>County Reporting</b></p>	<p><b>League Reporting</b></p>

		<p><b>2017 APR</b></p> <p>The 2017 APR appraisal of the implementation of Program Objective 4.2 was identical to that for Program Objective 4.1.</p> <p>The County's 2017 appraisal of the implementation of Program Objective 4.1 is reprinted in full below:</p> <p><i>"The County monitor [sic] its inventory of vacant sites available for residential developments on an ongoing basis to ensure sufficient lands are available to accommodate the County's share of the Fifth-Cycle RHNA allocations."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the County was monitoring its inventory of vacant sites available for residential development.</p> <p>Program H-4.2 required the County to monitor the "effectiveness" of non-residential zones to facilitate residential development.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County's 2017 APR to support a conclusion that the County monitored the "effectiveness" of non-residential zones to facilitate residential development.</p> <p><b>Evidence of the successful implementation of Program H-4.2 during 2017:</b></p> <p>None.</p>
140	H-4.3	<p><b>Deliverable:</b> In the event that rezoning/upzoning is required to meet a Regional Housing Needs Allocation (RHNA) shortfall, the new sites shall be adequate in size to accommodate at least 16 units per site at a minimum density of 20 units per acre.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR appraisal of the implementation of Program Objective 4.3 was identical to that for Program Objective 4.1.</p> <p>The County's 2017 appraisal of the implementation of Program Objective 4.1 is reprinted in full below:</p> <p><i>"The County monitor [sic] its inventory of vacant sites available for residential developments on an ongoing basis to ensure sufficient lands are available to accommodate the County's share of the Fifth-Cycle RHNA allocations."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County monitored its inventory of vacant sites available for residential development.</p> <hr/> <p><b>Conclusion:</b></p> <p>Overall, it appears the County has more than adequate capacity to accommodate its Fifth-Cycle RHNA allocation, although the County's 2017 APR did not provide a recalculation of remaining capacity.</p> <p><b>Evidence of the successful implementation of Program H-4.3 during 2017:</b></p> <p>Good.</p>

## Program 5: Lot Consolidation and Lot Splits

141	H-5.1	<p><b>Deliverable:</b> Assistance to interested developers/property owners in identifying opportunities for lot consolidation or lot splitting.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 5.1 is printed in full below:</p> <p><i>"The County continues to facilitate lot consolidation and lot splits to promote the efficient use of land for residential development."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County facilitated lot consolidation or lot splitting.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has assisted interested developers/property owners in identifying opportunities for lot consolidation or lot splitting.</p> <p><b>Evidence of the successful implementation of Program H-5.1 during 2017:</b></p> <p>Poor.</p>
142	H-5.2	<p><b>Deliverable:</b> Ongoing streamlining of the processing of requests for lot consolidation and lot splitting concurrent with other development reviews.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 5.2.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the 2017 APR did not comment on this program objective, there is no information to indicate that the County streamlines the processing of requests for lot consolidation and lot splitting.</p> <p><b>Evidence of the successful implementation of Program H-5.2 during 2017:</b></p>

			None.
143	H-5.3	<p><b>Deliverables:</b> Annual monitoring of lot consolidation activities.</p> <p>Evaluation of the effectiveness of the County's efforts to facilitate lot consolidation of small sites for residential development.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 5.3 is printed in full below:</p> <p><i>"There were no residential development project [sic] requiring lot consolidation or lot split process in 2017."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that no residential development projects required lot consolidation or lot split process in 2017.</p> <p>The County's 2017 APR provided no information to support a conclusion that the County evaluated the "effectiveness" of the County's efforts to facilitate lot consolidation of small sites for residential development.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County's 2017 APR to support a conclusion that the County evaluates the "effectiveness" of its efforts to facilitate lot consolidation of small sites for residential development.</p> <p><b>Evidence of the successful implementation of Program H-5.3 during 2017:</b></p> <p>None.</p>
144	H-5.4	<p><b>Deliverable:</b> Encouragement of the use of master plans/specific plans to provide a cohesive development strategy for large lots.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 5.4 is printed in full below:</p> <p><i>"The County will encourage the use of master plans/specific plans to provide a cohesive development strategy for large lots."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that, at a future time, the County would encourage the use of master plans/specific plans to provide a cohesive development strategy for large lots.</p> <p>(It should be noted that the Housing Element does not define the size of the "large lots" that</p>

		None.	<p>would benefit from having master or specific plans.)</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County's 2017 APR to support a conclusion that the County encourages the use of master plans/specific plans to provide a cohesive development strategy for large lots.</p> <p><b>Evidence of the successful implementation of Program H-5.4 during 2017:</b></p> <p>None.</p>
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**Program 6: Coordination of Infrastructure and Services**

145	H-6.1	<p><b>Deliverable:</b> Communication, at least semi-annually (or as major development applications are received), with independent service providers to assess development trends, needs for infrastructure and services, and plans for expansion to ensure adequate infrastructure and services are available to meet the County's RHNA.</p>	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 6.1 is printed in full below:</p> <p><i>"The County continues to coordinate with water and sewer service providers to assess development trends, needs for infrastructure and services, and plans for expansion of services to meet the county's RHNA allocations.</i></p> <p><i>No major development project was proposed during the calendar year 2017 in the unincorporated areas of the County."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County coordinated with water and sewer service providers to assess development trends, needs for infrastructure and services, and plans for expansion of services to meet the county's RHNA allocations.</p> <p>The APR did not report on the County's semi-annual communication with independent service providers.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County communicates, at least semi-annually, with independent service providers to ensure adequate infrastructure and services are available to meet the County's RHNA.</p>

			<p><b>Evidence of the successful implementation of Program HS-6.1 during 2017:</b></p> <p>Poor.</p>
146	H-6.2	<p><b>Deliverable:</b> As appropriate, assistance to County Service Districts to encourage them to address infrastructure and service deficiencies.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 6.2 is printed in full below:</p> <p><i>"The County encourages water and sewer service providers to improve infrastructure improvements in communities with infrastructure and service deficiencies."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County encouraged water and sewer service providers to improve infrastructure improvements in communities with infrastructure and service deficiencies.</p> <p>The APR did not state whether any County service districts had infrastructure and service deficiencies and, if so, the extent to which the County provided assistance to those districts.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County's 2017 APR to support a conclusion that the County assists County Service Districts in their efforts to address infrastructure and service deficiencies.</p> <p><b>Evidence of the successful implementation of Program H-6.2 during 2017:</b></p> <p>None.</p>
147	H-6.3	<p><b>Deliverable:</b> At least annually, the search for funding for County Service Districts (CSDs) to expand infrastructure and services consistent with the County's General Plan and community plan policies.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR appraisal of the implementation of Program Objective 6.3 was identical to that for Program Objective 6.2.</p> <p>The County's 2017 appraisal of the implementation of Program Objective 6.2 is reprinted in full below:</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County encouraged water and sewer service providers to improve infrastructure improvements in communities with infrastructure and service deficiencies.</p>



		<p><i>“The County encourages water and sewer service providers to improve infrastructure improvements in communities with infrastructure and service deficiencies.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County’s 2017 APR to support a conclusion that in 2017 the County searched for funding for County Service Districts to expand infrastructure and services.</p> <p><b>Evidence of the successful implementation of Program H-6.3 during 2017:</b></p> <p>None.</p>
148	H-6.4	<p><b>Deliverable:</b> At least annually, meeting(s) with developers and community stakeholders to discuss, pursue or support funding sources, including CDBG and/or HOME funds, to reduce the costs of development (e.g., infrastructure improvements).</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County’s 2017 appraisal of the implementation of Program Objective 6.4 is printed in full below:</p> <p><i>“As funding permits, the County continues consideration of CDBG and/or HOME funds as gap financing to affordable projects as a means to reducing the costs of development, including infrastructure improvements.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2017 APR stated that the County considered CDBG and/or HOME funds as gap financing to affordable housing projects as a means to reduce the costs of development, including infrastructure improvements.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County’s 2017 APR to support a conclusion that in 2017 the County met with developers and community stakeholders to discuss, pursue or support funding sources, including CDBG and/or HOME funds, to reduce the costs of development.</p> <p><b>Evidence of the successful implementation of Program H-6.4 during 2017:</b></p> <p>None.</p>
149	H-6.5	<p><b>Deliverable:</b> Annual exploration and pursuit of funding opportunities for community plan updates, as necessary, to promote the development of active transportation and access to services and amenities within existing communities.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p>	<p style="text-align: center;"><b>League Reporting</b></p>

		<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 6.5 is printed in full below:</p> <p><i>"The County Continues [sic] on an ongoing basis to explore and pursue funding opportunities for community plan updates."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the County continued to pursue funding opportunities for community plan updates.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County's 2017 APR to support a conclusion that in 2017 the County explored and pursued funding opportunities for community plan updates to promote the development of active transportation and access to services and amenities within existing communities.</p> <p><b>Evidence of the successful implementation of Program H-6.5 during 2017:</b></p> <p>None.</p>
150	H-6.6	<p><b>Deliverable:</b> Distribution of a copy of the adopted Housing Element to service providers serving unincorporated communities.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 6.6 is printed in full below:</p> <p><i>"Copies of the adopted Fifth-Cycle Housing Element Update have been provided to the various service providers serving the unincorporated communities."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that copies of the adopted Housing Element were provided to various service providers serving unincorporated communities.</p> <p>(It should be noted that the County's 2015-2023 Housing Element does not list the service providers that should receive copies of the most recent update of the Housing Element.)</p> <hr/> <p><b>Conclusion:</b></p> <p>The County distributes copies of the adopted Housing Element to service providers serving unincorporated communities.</p> <p><b>Evidence of the successful implementation of Program H-6.6 during 2017:</b></p> <p>Good.</p>

# Affordable Housing Development and Preservation

## Program 7: Affordable Housing Incentives

151	H-7.1	<p><b>Deliverable:</b> Ongoing offer of incentives such as gap financing, density bonus and streamlined processing to eligible affordable housing developers to facilitate the development of affordable housing opportunities for very-low and extremely-low income households, as well as special needs populations.</p>	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County’s 2017 appraisal of the implementation of Program Objective 7.1 is printed in full below:</p> <p><i>“In 2017, Fresno County did not utilize any HOME Investment Partnerships Program (HOME) funds as gap financing loans for the development of affordable housing in the unincorporated area. The County completed two HOME-funded affordable housing projects during 2017 but both were in partner cities (Selma and Reedley). The County also had two HOME-funded affordable housing projects under construction as of the end of 2017 (not yet completed), but both were in partner cities (Sanger and Fowler).</i></p> <p><i>The County continues its efforts to provide HOME funds as gap financing to develop new affordable housing projects in the unincorporated area and its partner cities, as its Federal HOME funding permits.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County’s 2017 APR stated that in 2017 the County did not utilize any HOME Investment Partnerships Program funds as gap financing loans for the development of affordable housing in the unincorporated areas of the county, although such funding was used in 2017 for affordable housing projects in the cities of Selma, Reedley, Sanger and Fowler.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County’s 2017 APR to support a conclusion that in 2017 the County offered incentives such as gap financing, density bonus and streamlined processing to eligible developers to facilitate the development of affordable housing opportunities in unincorporated areas of the county.</p> <p><b>Evidence of the successful implementation of Program H-7.1 during 2017:</b></p> <p>None.</p>
152	H-7.2	<p><b>Deliverable:</b> Ongoing search for partnerships and the regular meeting, at least annually, with agencies, housing developers, community stakeholders and employers to discuss and pursue opportunities for providing affordable housing.</p>	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 7.2.</p>	<p><b>League Reporting</b></p> <p>The County’s 2017 APR did not comment on this program objective.</p>

		<p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<hr/> <p><b>Conclusion:</b></p> <p>Because the 2017 APR did not comment on this program objective, there is no information to indicate that in 2017 the County searched for partnerships and held regular meetings to discuss and pursue opportunities for providing affordable housing.</p> <p><b>Evidence of the successful implementation of Program H-7.2 during 2017:</b></p> <p>None.</p>
153	H-7.3	<p><b>Deliverable:</b> Monitoring of the California Department of Housing and Community Development (HCD) and HUD's websites for Notices of Funding Ability (NOFA) and, where appropriate, preparation or support of applications for funding for affordable housing for lower-income households.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 7.3 is printed in full below:</p> <p><i>"To [sic] County continues to monitor the State Department of Housing and Community Development's (HCD's) and HUD's websites for Notices of Funding Ability (NOFA) for affordable housing for lower-income households."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County continued to monitor the State Department of Housing and Community Development's (HCD's) and HUD's websites for Notices of Funding Ability for affordable housing for lower-income households.</p> <p>The APR did not report the result of that monitoring and whether the County had prepared or supported applications for funding for affordable housing for lower-income households.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to monitor HCD's website or capitalize on that monitoring to prepare or support applications for funding for affordable housing for lower-income households.</p> <p><b>Evidence of the successful implementation of Program H-7.3 during 2017:</b></p> <p>Poor.</p>

154	H-7.4	<p><b>Deliverable:</b> Ongoing support and encouragement of agencies and housing developers to apply for funds, including California HCD and USDA Rural Development loans and grants, that may become available.</p>	
	<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 7.4 is printed in full below:</p> <p><i>"The County supports the efforts of other agencies and housing developers, such as the Fresno Housing Authority and Self-Help Enterprises, in the application of funds, including State HCD and USDA Rural Development loans and grants and other funding sources that may become available."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County supported the efforts of other agencies and housing developers in the application of funds, including State HCD and USDA Rural Development loans and grants and other funding sources that may become available.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County supports the efforts of other agencies and housing developers in their applications for the funding of affordable housing.</p> <p><b>Evidence of the successful implementation of Program H-7.4 during 2017:</b></p> <p>Poor.</p>	
155	H-7.5	<p><b>Deliverable:</b> Ongoing effort to streamline and improve efficiencies in planning and permit approval and building inspection service.</p>	
	<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 7.5 is printed in full below:</p> <p><i>"The County continues its efforts to streamline and improve efficiencies in planning and permit approval and building inspection service."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County continued to streamline and improve efficiencies in planning, permit approval and building inspection services for the construction of affordable housing.</p> <p>The County did not provide information in support of this claim.</p> <hr/> <p><b>Conclusion:</b></p>	

			<p>Information provided by the County is insufficient to understand the extent to which the County has been able to streamline and improve efficiencies in planning and permit approval and building inspection services.</p> <p><b>Evidence of the successful implementation of Program H-7.5 during 2017:</b></p> <p>Poor.</p>
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156	H-7.6	<p><b>Deliverable:</b> To the extent feasible, by 2020, establishment, via the Internet, of a program that accommodates submittal and issuance of permits pertaining to the development of affordable housing.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 7.6 is printed in full below:</p> <p><i>"The County continuously explores opportunities to accommodate submittal and issuance of certain permits via the Internet, where feasible."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County continuously explored opportunities to accommodate submittal and issuance of certain permits via the Internet, where feasible.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the County's APR did not comment on the County's effort to establish a "program" to accommodate submittal and issuance of permits pertaining to the development of affordable housing, there is no information to indicate that the County is making progress in that regard.</p> <p><b>Evidence of the successful implementation of Program H-7.6 during 2017:</b></p> <p>Poor.</p>

**Program 8: Farmworker Housing**

157	H-8.1	<p><b>Deliverable:</b> Ongoing search for partnerships and at least an annual meeting with agencies, housing developers, community stakeholders, and agricultural employers/employees to discuss opportunities and options for the location of farmworker housing.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p>	<p style="text-align: center;"><b>League Reporting</b></p>

		<p>The County's 2017 appraisal of the implementation of Program Objective 8.1 is printed in full below:</p> <p><i>"The County continues to seek partnerships with other agencies to discuss opportunities for farmworker housing.</i></p> <p><i>The participating local governments plan on meeting with representatives of the Housing Authority and agricultural employers to discuss opportunities for farmworker housing."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the County sought partnerships with other agencies to discuss opportunities for farmworker housing and that the County would, in the future, meet with representatives of the Housing Authority and agricultural employers to discuss opportunities for farmworker housing.</p> <hr/> <p><b>Conclusion:</b></p> <p>There is no information in the County's 2017 APR to support a conclusion that in 2017 the County met with agencies, housing developers, community stakeholders, and agricultural employers/employees to discuss opportunities and options for the location of farmworker housing.</p> <p><b>Evidence of the successful implementation of Program H-8.1 during 2017:</b></p> <p>None.</p>
158	H-8.2	<p><b>Deliverable:</b> Ongoing support and encouragement of agencies and housing developers in the application of funds for farmworker housing, including California Housing and Community Development (HCD) and U.S. Department of Agriculture (USDA) Rural Development loans and grants.</p> <hr/> <p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 8.2 is printed in full below:</p> <p><i>"The County will continue to support and encourage other agencies and housing developers, such as the Fresno Housing Authority and Self-Help Enterprises, in the application of funds for farmworker housing, including State HCD and USDA Rural Development loans and grants and other funding sources that may become available.</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County supported the efforts of other agencies and housing developers in the application of funds for farmworker housing.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County supports the efforts of other agencies and housing developers in their applications for the funding of farmworker housing.</p> <p><b>Evidence of the successful implementation of Program H-8.2 during 2017:</b></p> <p>Poor.</p>

159	H-8.3	<p><b>Deliverables:</b> Annual monitoring of the status of farmworker housing</p> <p>Evaluation of the effectiveness of the County's efforts to facilitate the provision of farmworker housing.</p>	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 8.3.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the 2017 APR did not comment on this program objective, there is no information to indicate that in 2017 the County monitored the status of farmworker housing and evaluated the effectiveness of the County's efforts to facilitate the provision of farmworker housing.</p> <p><b>Evidence of the successful implementation of Program H8.3 during 2017:</b></p> <p>None.</p>

**Program 9: Preserving Assisted Housing**

160	H-9.1	<p><b>Deliverable:</b> Ongoing monitoring of the status of affordable housing projects (with financial assistance from federal, state and County programs) to determine if they are at risk of converting to market-rate housing, and if found to be at risk, engage in specified actions to address the situation.</p>	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 9.1 is printed in full below:</p> <p><i>"The Housing Authority of Fresno County (HAFC) manages, monitors, improves, and creates assisted housing in the unincorporated area. No affordable housing rental projects in the unincorporated area are considered at risk of converting to market rate housing."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p>	<p><b>League Reporting</b></p> <p>According to information in the County's 2015-2023 Housing Element, there are 196 assisted affordable housing units in 6 projects in unincorporated areas of the county, which are managed by the Housing Authority of Fresno County and none of which are at risk of losing their public assistance prior to 2025.</p> <p>(It should be noted that the County's 2017 APR did not indicate that the County had</p>



	None.	<p>conducted monitoring in 2017 to see if the risk assessment from 2015 had changed.)</p> <hr/> <p><b>Conclusion:</b></p> <p>None of the 6 housing projects that receive federal, state and county assistance are at risk of converting to market rate housing.</p> <p><b>Evidence of the successful implementation of Program H-9.1 during 2017:</b></p> <p>Good.</p>
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## Removal of Governmental Constraints

### Program 10: Zoning Ordinance Amendments

161	H-10.1	<p><b>Deliverable:</b> Completion of the comprehensive Zoning Ordinance update in 2017 to address provisions for density bonuses and an increase the allowable density at R2, R2-A, R3, R3-A, R4, C4 and RP to 20 units per acre.</p>				
		<table border="1" style="width: 100%;"> <thead> <tr> <th style="text-align: center;">County Reporting</th> <th style="text-align: center;">League Reporting</th> </tr> </thead> <tbody> <tr> <td> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 10.1 is printed in full below:</p> <p><i>"As part of the General Plan Review and the Zoning Ordinance Update that is underway, the County has addressed the density bonus, Single-Room Occupancy, multi-family housing in C-4 Zone , farm labor housing, and increasing density for R2, R2A, R3, R3A, R4, C4 and RP zones."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p style="color: red;">None.</p> </td> <td> <p>The County's 2017 APR indicated that a provision for density bonuses and in increase in allowable housing density would be addressed during the update of the Zoning Ordinance. That effort was begun in late 2005, and after 13 years, the work is still unfinished. According to information in the County's 2015-2023 Housing Element, internal consistency between the 2015-2023 Housing Element and the Zoning Ordinance was to have been achieved by 2016.</p> <hr/> <p><b>Conclusion:</b></p> <p>It is difficult to anticipate when the Zoning Ordinance will be amended to include a provision for density bonuses and an increase in allowable housing density.</p> <p><b>Evidence of the successful implementation of Program H-10.1 during 2017:</b></p> <p>Poor.</p> </td> </tr> </tbody> </table>	County Reporting	League Reporting	<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 10.1 is printed in full below:</p> <p><i>"As part of the General Plan Review and the Zoning Ordinance Update that is underway, the County has addressed the density bonus, Single-Room Occupancy, multi-family housing in C-4 Zone , farm labor housing, and increasing density for R2, R2A, R3, R3A, R4, C4 and RP zones."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p style="color: red;">None.</p>	<p>The County's 2017 APR indicated that a provision for density bonuses and in increase in allowable housing density would be addressed during the update of the Zoning Ordinance. That effort was begun in late 2005, and after 13 years, the work is still unfinished. According to information in the County's 2015-2023 Housing Element, internal consistency between the 2015-2023 Housing Element and the Zoning Ordinance was to have been achieved by 2016.</p> <hr/> <p><b>Conclusion:</b></p> <p>It is difficult to anticipate when the Zoning Ordinance will be amended to include a provision for density bonuses and an increase in allowable housing density.</p> <p><b>Evidence of the successful implementation of Program H-10.1 during 2017:</b></p> <p>Poor.</p>
County Reporting	League Reporting					
<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 10.1 is printed in full below:</p> <p><i>"As part of the General Plan Review and the Zoning Ordinance Update that is underway, the County has addressed the density bonus, Single-Room Occupancy, multi-family housing in C-4 Zone , farm labor housing, and increasing density for R2, R2A, R3, R3A, R4, C4 and RP zones."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p style="color: red;">None.</p>	<p>The County's 2017 APR indicated that a provision for density bonuses and in increase in allowable housing density would be addressed during the update of the Zoning Ordinance. That effort was begun in late 2005, and after 13 years, the work is still unfinished. According to information in the County's 2015-2023 Housing Element, internal consistency between the 2015-2023 Housing Element and the Zoning Ordinance was to have been achieved by 2016.</p> <hr/> <p><b>Conclusion:</b></p> <p>It is difficult to anticipate when the Zoning Ordinance will be amended to include a provision for density bonuses and an increase in allowable housing density.</p> <p><b>Evidence of the successful implementation of Program H-10.1 during 2017:</b></p> <p>Poor.</p>					

<b>162</b>	<b>H-10.2</b>	<b>Deliverable:</b> Evidence of addressing the provision for Single-Room Occupancy (SRO) housing as part of the comprehensive Zoning Ordinance update in 2016.	
	<b>County Reporting</b>	<b>League Reporting</b>	
		<p><b>2017 APR</b></p> <p>The County's 2017 APR appraisal of the implementation of Program Objective 10.2 was identical to that for Program Objective 10.1.</p> <p>The County's 2017 appraisal of the implementation of Program Objective 10.1 is reprinted in full below:</p> <p><i>"As part of the General Plan Review and the Zoning Ordinance Update that is underway, the County has addressed the density bonus, Single-Room Occupancy, multi-family housing in C-4 Zone , farm labor housing, and increasing density for R2, R2A, R3, R3A, R4, C4 and RP zones."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR indicated that a provision for Single-Room Occupancy (SRO) housing would be addressed during the update of the Zoning Ordinance. That effort was begun in late 2005, and after 13 years, the work is still unfinished. According to information in the County's 2015-2023 Housing Element, internal consistency between the 2015-2023 Housing Element and the Zoning Ordinance was to have been achieved by 2016.</p> <hr/> <p><b>Conclusion:</b></p> <p>It is difficult to anticipate when the Zoning Ordinance will be amended to include a provision Single-Room Occupancy (SRO) housing.</p> <p><b>Evidence of the successful implementation of Program H-10.2 during 2017:</b></p> <p>Poor.</p>
<b>163</b>	<b>H-10.3</b>	<b>Deliverable:</b> In 2016, examination of alternatives to requiring discretionary approval for the development of multi-family housing in the C-4 Zone District and adoption of appropriate actions to expedite the review and processing of multi-family housing development applications.	
	<b>County Reporting</b>	<b>League Reporting</b>	
		<p><b>2017 APR</b></p> <p>The 2017 APR appraisal of the implementation of Program Objective 10.3 was identical to that for Program Objective 10.1.</p> <p>The County's 2017 appraisal of the implementation of Program Objective 10.1 is reprinted in full below:</p> <p><i>"As part of the General Plan Review and the Zoning Ordinance Update that is underway, the County has addressed the density bonus, Single-Room Occupancy, multi-family housing in C-4 Zone , farm labor housing,</i></p>	<p>The County's 2017 APR indicated that a provision for alternatives to requiring discretionary approval for the development of multi-family housing in the C-4 Zone District and adoption of appropriate actions to expedite the review and processing of multi-family housing development applications would be addressed during the update of the Zoning Ordinance. That effort was begun in late 2005, and after 13 years, the work is still unfinished. According to information in the County's 2015-2023 Housing Element,</p>

		<p><i>and increasing density for R2, R2A, R3, R3A, R4, C4 and RP zones.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>internal consistency between the 2015-2023 Housing Element and the Zoning Ordinance was to have been achieved by 2016.</p> <hr/> <p><b>Conclusion:</b></p> <p>It is difficult to anticipate when the Zoning Ordinance will be amended to include a provision for alternatives to requiring discretionary approval for the development of multi-family housing and adoption of appropriate actions to expedite the review and processing of multi-family housing development applications.</p> <p><b>Evidence of the successful implementation of Program H-103.3 during 2017:</b></p> <p>Poor.</p>
164	H-10.4	<p><b>Deliverable:</b> Consideration of the establishment of a discretionary permit requirement for new agricultural operations and farm labor housing in residential zones.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR appraisal of the implementation of Program Objective 10.4 was identical to that for Program Objective 10.1.</p> <p>The County's 2017 appraisal of the implementation of Program Objective 10.1 is reprinted in full below:</p> <p><i>“As part of the General Plan Review and the Zoning Ordinance Update that is underway, the County has addressed the density bonus, Single-Room Occupancy, multi-family housing in C-4 Zone , farm labor housing, and increasing density for R2, R2A, R3, R3A, R4, C4 and RP zones.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR indicated that a provision for the establishment of a discretionary permit requirement for new agricultural operations and farm labor housing in residential zones would be addressed during the update of the Zoning Ordinance. That effort was begun in late 2005, and after 13 years, the work is still unfinished. According to information in the County's 2015-2023 Housing Element, internal consistency between the 2015-2023 Housing Element and the Zoning Ordinance was to have been achieved by 2016.</p> <hr/> <p><b>Conclusion:</b></p> <p>It is difficult to anticipate when the Zoning Ordinance will be amended to include a provision for the establishment of a discretionary permit requirement for new agricultural operations and farm labor housing in residential zones.</p>

			<b>Evidence of the successful implementation of Program H-10.4 during 2017:</b>  Poor.
165	H-10.5	<b>Deliverable:</b> Annual review of the effectiveness and appropriateness of the Zoning Ordinance and the amendment of the same to remove or mitigate potential constraints to the development of housing.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 10.5.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the 2017 APR did not comment on this program objective, there is no information to indicate that in 2017 the County reviewed the effectiveness and appropriateness of the Zoning Ordinance and the amendment of the same to remove or mitigate potential constraints to the development of housing.</p> <p><b>Evidence of the successful implementation of Program H-10.5 during 2017:</b></p> <p>None.</p>

**Program 11: Monitoring of Planning and Development Fees**

166	H-11.1	<b>Deliverable:</b> Should the Board of Supervisors decide to reinstate public facilities impact fees, annual monitoring of the fees to ensure they do not unduly constrain housing development.	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 11.1 is printed in full below:</p> <p><i>"On May 19, 2015, the Board of Supervisors conducted a public hearing to consider an amendment to repeal the Public Facilities Impact Fees Ordinance in its entirety. At the conclusion of the hearing, the Board decided to continue suspension of the impact fees to November 9, 2017 and directed Staff to return to the Board with a workshop on the County's Facility Impact</i></p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that on October 31, 2017, the Board of Supervisors decided to continue the suspension of public facilities impact fees.</p> <p>It is important to note that even though this program objective will not become effective until the Board reinstates the collection of fees, the suspension of fees was in violation</p>

	<p><i>Fees and provide options for the Board to consider. On October 31, 2017, the Board of Supervisors conducted the second public hearing to consider an amendment to the County Ordinance for Public Facilities Impact Fees. At the conclusion of the hearing, the Board decided to continue suspension of the impact fees to November 10, 2018.</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p><b>None.</b></p>	<p>of the General Plan Policy PF-B.1, which reads in full as follows:</p> <p><i>“The County shall require that new development pays its fair share of the cost of developing new facilities and services and upgrading existing public facilities and services; exceptions may be made when new development generates significant public benefits (e.g., low income housing) and when alternative sources of funding can be identified to offset foregone revenues.”</i></p> <p>(It should also be noted that there is no process for “suspending” General Plan programs other than amending the General Plan, which was not done.)</p> <hr/> <p><b>Conclusion:</b></p> <p>On October 9, 2018, the Board voted to discontinue the collection of the public facilities impact fees until a new Public Facilities Impact Report is prepared.</p> <p>Program H-11.1 will not go into effect until the Board of Supervisors decides to reinstate public facilities impact fees.</p> <p><b>Evidence of the successful implementation of Program H-11.1 during 2017:</b></p> <p>Good.</p>
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## Housing Quality

### Program 12: Housing Assistance Rehabilitation Program (HARP)

167	H-12.1	<b>Deliverable:</b> Rehabilitation assistance to eight low-income households in the unincorporated areas during the planning period (2015 – 2023).	
		<b>County Reporting</b>	<b>League Reporting</b>
		<p><b>2017 APR</b></p> <p>The County’s 2017 appraisal of the implementation of Program Objective 12.1 is printed in full below:</p> <p><i>“Fresno County provided a HARP loan to one very low income household in the unincorporated area during 2017. The County provided two HARP loans to one extremely low income household and one very low</i></p>	<p>The County’s 2017 APR stated that in 2017 the County provided one HARP loan to a low-income household located in an unincorporated area of the county and two HARP loans to low-income households located in participating cities.</p>

	<p><i>income household in participating cities during 2017. These loans are no-interest affordable payment loans for eligible housing rehabilitation.</i></p> <p><i>The County continues to market HARP to all unincorporated area homeowners, and continues to meet with community groups to provide information on the program.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>Conclusion:</b></p> <p>In 2017 the County provided one HARP loan to an eligible household in an unincorporated area of the county. At a rate of one such loan per year, the County will likely meet the requirement to provide eight such loans by 2023.</p> <p><b>Evidence of the successful implementation of Program H-12.1 during 2017:</b></p> <p>Good.</p>
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**Program 13: Rental Rehabilitation Program (RRP)**

168	H-13.1	<b>Deliverable:</b> Assistance for the rehabilitation of four rental housing units during the planning period (2015 – 2023).	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 13.1 is printed in full below:</p> <p><i>“Fresno County did not provide any Rental Rehabilitation Program loans for housing rehabilitation projects in the unincorporated area during 2017.</i></p> <p><i>The County continues to market the Rental Rehabilitation Program.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County had not provided any Rental Rehabilitation Program loans for housing rehabilitation projects in unincorporated areas of the county during 2017.</p> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to show that the County is making progress toward providing assistance for the rehabilitation of four rental housing units.</p> <p><b>Evidence of the successful implementation of Program H-13.1 during 2017:</b></p> <p>Poor.</p>

**Program 14: Code Enforcement**

169	H-14.1	<b>Deliverable:</b> Ongoing enforcement of property maintenance standards and the abatement of substandard structures through code enforcement and various housing rehabilitation programs.
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		<b>County Reporting</b>	<b>League Reporting</b>
		<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 14.1 is printed in full below:</p> <p><i>"The County continues to enforce zoning and building codes to ensure compliance with land use regulations and safety codes. Code enforcement staff will respond to complaints and pursue each case to abate the violation. The County Ordinance includes fines and other punitive measures for those who do not abate the violations."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the County continued to enforce zoning and building codes.</p> <p>(It should be noted that the County provided no information on code enforcement activities during 2017, such as the number of complaints, the types of violations or the extent to which the County employed fines or other punitive measures.)</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County has been able to enforce property maintenance standards and the abatement of substandard structures through code enforcement and various housing rehabilitation programs.</p> <p><b>Evidence of the successful implementation of Program H-14.1 during 2017:</b></p> <p>Poor.</p>

## Housing Assistance

### Program 15: Homebuyer Assistance Program (HAP)

<b>170</b>	<b>H-15.1</b>	<b>Deliverable:</b> Assistance to 11 low-income households as part of an 11-unit affordable housing project in Riverdale during the planning period (2015 – 2023).	
		<b>County Reporting</b>	<b>League Reporting</b>
		<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 15.1 is printed in full below:</p> <p><i>"The County provided HAP loans to two low income homebuyers to purchase a home in the unincorporated area during 2017. An additional two HAP loans were made (one very low income homebuyer and one low income homebuyer) for purchases in participating cities during this period."</i></p>	<p>The County's 2017 APR stated that the County had provided HAP loans to two low-income homebuyers to purchase homes in unincorporated areas of the county. Even so, the one objective of this program was to provide assistance to 11 low-income households as part of an 11-unit affordable housing project in Riverdale during the planning period (2015 – 2023).</p>

	<p><i>The County continues to market HAP to eligible first time homebuyers, and works closely with lenders and the real estate community to ensure the program is made available whenever possible to qualified applicants.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>Conclusion:</b></p> <p>There is no information in the County’s 2017 APR to support a conclusion that the County has provided assistance to 11 low-income households as part of an 11-unit affordable housing project in Riverdale.</p> <p><b>Evidence of the successful implementation of Program H-15.1 during 2017:</b></p> <p>None.</p>
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**Program 16: First-Time Homebuyer Resources**

171	H-16.1	<b>Deliverable:</b> Promotion of available homebuyer resources on the County website and at public counters.	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County’s 2017 appraisal of the implementation of Program Objective 16.1 is printed in full below:</p> <p><i>“The County continues to provide information on its Homebuyer Assistance Program to first time homebuyers via flyers and its website, as well as through meetings with lenders, realtors, and community groups, to ensure the program is made available whenever possible to qualified applicants. During meetings with lenders and community groups, other non-County sources of available financing are also discussed.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County’s 2017 APR stated that the County promoted available homebuyer resources on the County website and at public counters.</p> <p>The County has a webpage entitled “Affordable Housing Programs” where programs such as the Homebuyer Assistance Program are explained.</p> <p><b>Conclusion:</b></p> <p>The County promotes available homebuyer resources on the County’s website and at public counters.</p> <p><b>Evidence of the successful implementation of Program H-16.1 during 2017:</b></p> <p>Good.</p>
172	H-16.2	<b>Deliverable:</b> Annual review of funding resources available at the state and federal levels and, as appropriate, pursuit of funding sources to provide homebuyer assistance.	



		<b>County Reporting</b>	<b>League Reporting</b>
		<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 16.2 is printed in full below:</p> <p><i>"The County continues to review funding resources available from the State and Federal government to pursue as appropriate to provide homebuyer assistance. There were no new funding sources available to the County from these or other sources during 2017."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the County continued to review funding resources available from the state and federal government during 2017 and that there were no "new" funding sources available to the County from state, federal or other sources.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County, in 2017, conducted a review of funding resources and provided assistance to homebuyers through the pursuit of that funding.</p> <p><b>Evidence of the successful implementation of Program H-16.2 during 2017:</b></p> <p>Poor.</p>

**Program 17: Housing Choice Voucher Rental Assistance**

173	H-17.1	<p><b>Deliverable:</b> Ongoing support for and encouragement of the provision of Housing Choice Vouchers (HCVs) to qualifying Fresno County households.</p>	
		<b>County Reporting</b>	<b>League Reporting</b>
		<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 17.1 is printed in full below:</p> <p><i>"The County supports the efforts of the Housing Authority of Fresno County (HAFC) in offering Section 8 and other rental assistance programs in the unincorporated area.</i></p> <p><i>The County reviews and certifies the HAFC's five-year and annual plans for consistency with the County's Consolidated Plan. The County does not provide rental assistance directly."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that although the County does not administer Housing Choice Vouchers directly, it does certify the annual and five-year plans of the Housing Authority of Fresno County, which does provide the Section 8 vouchers.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County supports and encourages the provision of Housing Choice Vouchers to qualifying Fresno County households.</p>

			<p><b>Evidence of the successful implementation of Program H-17.1 during 2017:</b></p> <p>Good.</p>
174	H-17.2	<p><b>Deliverable:</b> Ongoing referral of interested households and homeowners to the Fresno Housing Authority and encouragement of landlords to register their properties with the Housing Authority for accepting Housing Choice Vouchers (HCVs).</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 17.2.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the 2017 APR did not comment on this program objective, there is no information to indicate that the County refers interested households and homeowners to the Fresno Housing Authority and encourages landlords to register their properties with the Housing Authority for accepting Housing Choice Vouchers.</p> <p><b>Evidence of the successful implementation of Program H-17.2 during 2017:</b></p> <p>None.</p>
175	H-17.3	<p><b>Deliverable:</b> Evidence of working with the Housing Authority to disseminate information on incentives for participating in the Housing Choice Vouchers (HCV) program to promote housing opportunities for all unincorporated community residents.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 17.3.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the 2017 APR did not comment on this program objective, there is no information to indicate that the County works with the Housing Authority to disseminate information</p>

		<p>on incentives for participating in the Housing Choice Vouchers program.</p> <p><b>Evidence of the successful implementation of Program H-17.3 during 2017:</b></p> <p>None.</p>
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**Program 18: Energy Conservation**

176	H-18.1	<b>Deliverable:</b> Ongoing promotion and implementation of the County's Go Green initiatives	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 18.1 is printed in full below:</p> <p><i>"The County makes every effort to incorporate 'green building' and energy efficient components in housing being rehabilitated when practical and acceptable to the client. The County continues to promote and implement the County's Go Green initiatives."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County continued to promote and implement the County's Go Green initiatives.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County promoted and implemented the County's Go Green initiatives.</p> <p><b>Evidence of the successful implementation of Program H-18.1 during 2017:</b></p> <p>Poor.</p>

177	H-18.2	<b>Deliverable:</b> To conserve energy and improve air quality, consideration of the inclusion of design standards for new development that encourage alternative transportation as a part of the update of the County Zoning Ordinance.	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 18.2 is printed in full below:</p> <p><i>"[The County] is considering inclusion of design standards for new development that encourage alternative transportation (for example, bicycle lanes, bus turnouts, and direct pedestrian connections to transit lines) as a part of the update of the County</i></p>	<p><b>League Reporting</b></p> <p>The County's 2017 APR stated that the County was considering inclusion of design standards for new development that encouraged alternative transportation as part of the pending comprehensive update of the Zoning Ordinance.</p> <hr/>

		<p><i>Zoning Ordinance to conserve energy and improve air quality.”</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>Conclusion:</b></p> <p>Since program implementation only required “<i>consideration</i>” of the inclusion of design standards for new development that encourage alternative transportation as part of an effort to conserve energy and improve air quality, the program must be deemed fully implemented independent of whether or not the County actually adopted such design standards.</p> <p><b>Evidence of the successful implementation of Program H-18.2 during 2017:</b></p> <p>Good.</p>
178	H-18.3	<p><b>Deliverable:</b> Ongoing promotion and support for Pacific Gas and Electric Company programs that provide energy efficiency rebates for qualifying energy-efficient upgrades.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 18.3.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p style="text-align: center;"><b>League Reporting</b></p> <p>The County’s 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the 2017 APR did not comment on this program objective, there is no information to indicate that the County promotes and supports Pacific Gas and Electric Company programs that provide energy efficiency rebates for qualifying energy-efficient upgrades.</p> <p><b>Evidence of the successful implementation of Program H-18.3 during 2017:</b></p> <p>None.</p>
179	H-18.4	<p><b>Deliverable:</b> Ongoing incorporation of conservation measures into housing rehabilitation programs.</p>	
		<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p>	<p style="text-align: center;"><b>League Reporting</b></p>

		<p>The 2017 APR appraisal of the implementation of Program Objective 18.4 was identical to that for Program Objective 18.1.</p> <p>The County's 2017 appraisal of the implementation of Program Objective 18.1 is reprinted in full below:</p> <p><i>"The County continues to promote and implement the County's Go Green initiatives and....</i></p> <p><i>The County makes every effort to incorporate 'green building' and energy efficient components in housing being rehabilitated when practical and acceptable to the client."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the County continued to promote and implement the County's Go Green initiatives.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County incorporates conservation measures into housing rehabilitation programs.</p> <p><b>Evidence of the successful implementation of Program H-18.4 during 2017:</b></p> <p>Poor.</p>
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<b>180</b>	<b>H-18.5</b>	<b>Deliverable:</b> Evidence of the expeditious review and approval of residential alternative energy devices.	
		<p><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 18.5.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p><b>League Reporting</b></p> <p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>Because the 2017 APR did not comment on this program objective, there is no information to indicate that the County expeditiously reviews and approve residential alternative energy devices.</p> <p><b>Evidence of the successful implementation of Program H-18.5 during 2017:</b></p> <p>None.</p>

**Program 19: Fair Housing**

<b>181</b>	<b>H-19.1</b>	<b>Deliverable:</b> At least annually, the presentation of outreach and education workshops regarding fair housing for lenders, real estate professionals, housing providers, community stakeholders and the community at large.	
		<b>County Reporting</b>	<b>League Reporting</b>

		<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 19.1 is printed in full below:</p> <p><i>"During 2017, nine outreach and education workshops were conducted on fair housing for lenders, real estate professionals, housing providers, community stakeholders and the community at large."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the County presented nine outreach and education workshops regarding fair housing to lenders, real estate professionals, housing providers, community stakeholders and the community at large.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County presented outreach and education workshops in 2017 regarding fair housing for lenders, real estate professionals, housing providers, community stakeholders and the community at large.</p> <p><b>Evidence of the successful implementation of Program H-19.1 during 2017:</b></p> <p>Good.</p>
182	H-19.2	<p><b>Deliverable:</b> Dissemination of information and written materials in English and Spanish on fair housing rights, available services, and responsible agencies at County libraries, at Community Services District (CSA) offices, at public counters and on the County's website.</p>	
<p style="text-align: center;"><b>County Reporting</b></p> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 19.2 is printed in full below:</p> <p><i>"Fresno County focuses available resources toward mitigating obstacles through its affordable housing programs and services.</i></p> <p><i>Information on fair housing rights and responsibilities is available at public counters, and is provided during outreach efforts around the County."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>		<p style="text-align: center;"><b>League Reporting</b></p> <p>The County's 2017 APR stated that the information on fair housing rights was at public centers and was disseminated during outreach events.</p> <p>The APR did not state such information was available at County libraries, at Community Services District Offices or on the County's website.</p> <hr/> <p><b>Conclusion:</b></p> <p>Information provided by the County is insufficient to understand the extent to which the County disseminated information on fair housing rights, available services and responsible agencies at County libraries, at community services district offices and on the County's website.</p>	

			<p><b>Evidence of the successful implementation of Program H-19.2 during 2017:</b></p> <p>Poor.</p>				
183	H-19.3	<p><b>Deliverable:</b> Referral of fair housing complaints to the U.S. Department of Housing and Urban Development (HUD), the California Department of Fair Employment and Housing (DEFH), the Fair Housing Council of Central California (FHCCC) and other housing agencies.</p>	<table border="1"> <thead> <tr> <th data-bbox="979 426 979 426">County Reporting</th> <th data-bbox="979 426 1531 426">League Reporting</th> </tr> </thead> <tbody> <tr> <td data-bbox="321 426 979 1213"> <p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 19.3 is printed in full below:</p> <p><i>"No complaints were received regarding fair housing during 2017."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p> </td> <td data-bbox="979 426 1531 1213"> <p>The County's 2017 APR stated that the County did not receive any complaints during 2017. As a result, Program H-19.3 did not take effect that year.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County did not receive any fair housing complaints during 2017. (Program H-19.3 becomes effective upon the County receiving one or more fair housing complaints.)</p> <p><b>Evidence of the successful implementation of Program H-19.3 during 2017:</b></p> <p>Good.</p> </td> </tr> </tbody> </table>	County Reporting	League Reporting	<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 19.3 is printed in full below:</p> <p><i>"No complaints were received regarding fair housing during 2017."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the County did not receive any complaints during 2017. As a result, Program H-19.3 did not take effect that year.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County did not receive any fair housing complaints during 2017. (Program H-19.3 becomes effective upon the County receiving one or more fair housing complaints.)</p> <p><b>Evidence of the successful implementation of Program H-19.3 during 2017:</b></p> <p>Good.</p>
County Reporting	League Reporting						
<p><b>2017 APR</b></p> <p>The County's 2017 appraisal of the implementation of Program Objective 19.3 is printed in full below:</p> <p><i>"No complaints were received regarding fair housing during 2017."</i></p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR stated that the County did not receive any complaints during 2017. As a result, Program H-19.3 did not take effect that year.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County did not receive any fair housing complaints during 2017. (Program H-19.3 becomes effective upon the County receiving one or more fair housing complaints.)</p> <p><b>Evidence of the successful implementation of Program H-19.3 during 2017:</b></p> <p>Good.</p>						
184	H-19.4	<p><b>Deliverable:</b> Every five years, a Fair Housing Assessment as required by the U.S. Department of Housing and Urban Development (HUD).</p>	<table border="1"> <thead> <tr> <th data-bbox="979 1350 979 1350">County Reporting</th> <th data-bbox="979 1350 1531 1350">Implementation</th> </tr> </thead> <tbody> <tr> <td data-bbox="321 1350 979 1965"> <p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 19.4.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p> </td> <td data-bbox="979 1350 1531 1965"> <p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County's Analysis of Impediments (AI) to Fair Housing was last reviewed in May and will likely be done again in 2020.</p> <p><b>Evidence of the successful implementation of Program H-19.4 during 2017:</b></p> <p>Good.</p> </td> </tr> </tbody> </table>	County Reporting	Implementation	<p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 19.4.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County's Analysis of Impediments (AI) to Fair Housing was last reviewed in May and will likely be done again in 2020.</p> <p><b>Evidence of the successful implementation of Program H-19.4 during 2017:</b></p> <p>Good.</p>
County Reporting	Implementation						
<p><b>2017 APR</b></p> <p>The 2017 APR did not comment on Program Objective 19.4.</p> <p><b>Recommendations in the Draft 2017 Policy Document</b></p> <p>None.</p>	<p>The County's 2017 APR did not comment on this program objective.</p> <hr/> <p><b>Conclusion:</b></p> <p>The County's Analysis of Impediments (AI) to Fair Housing was last reviewed in May and will likely be done again in 2020.</p> <p><b>Evidence of the successful implementation of Program H-19.4 during 2017:</b></p> <p>Good.</p>						

## Tables Submitted by the County As Part of its 2017 Annual Progress Report (APR)

(Tables A, A2, A3 and B below were not reviewed by the League.)

**Table A**  
**Annual Building Activity Report Summary - New Construction**  
**Very Low-, Low-, and Mixed-Income Multifamily Projects**

Housing Development Information							Housing with Financial Assistance and/or Deed Restrictions	Housing without Financial Assistance or Deed Restrictions			
1	2	3	4				5	5a	6	7	8
Project Identifier (may be APN No., project name or address)	Unit Category	Tenure R=Renter O=Owner	Affordability by Household Incomes				Total Units per Project	Est. # Infill Units*	Assistance Programs for Each Development	Deed Restricted Units	Note below the number of units determined to be affordable without financial or deed restrictions and attach an explanation how the jurisdiction determined the units were affordable. Refer to instructions.
			Very Low - Income	Low - Income	Moderate- Income	Above Moderate- Income			See Instructions	See Instructions	
APN 312-400-24; 130-920-30; 580-030-21s; 334-300-32; 335-240-35; 308-081-59s	MH	O	6				6				
APN 553-052-19; 185-340-26s; 055-240-70s; 340-020-60; 313-082-39 & 309-340-02	MH	O	6				6				
APN 385-072-36; 138-371-12; 310-143-40; 334-400-16; 363-061-29; 363-280-04	SU	O		5			5				
APN 335-170-12, 13, 335-140-23s; 332-200-21; 310-220-22; 333-120-61; 360-120-01, 360-010-11s	SU	O		5			5				
APN 335-040-10; 348-180-28; 308-380-04s; 434-073-01; 327-150-20s, 21s; 055-450-20s	SU	O		6			6				
APN 150-081-22; 327-210-23; 340-160-26s; 334-250-47; 385-042-17s	SU	O		5			5				
APN 553-030-26; 309-410-23; 566-021-19s; 042-061-15 & 393-121-31	SU	O		5			5				
(9) Total of Moderate and Above Moderate from Table A3				54	71		125				
(10) Total by income Table A/A3			12	26	54	71	163				
(11) Total Extremely Low-Income Units*											

\* Note: These fields are voluntary

**Table A2**  
**Annual Building Activity Report Summary - Units Rehabilitated, Preserved and Acquired pursuant to GC Section 65583.1(c)(1)**

Please note: Units may only be credited to the table below when a jurisdiction has included a program in its housing element to rehabilitate, preserve or acquire units to accommodate a portion of its RHNA which meet the specific criteria as outlined in GC Section 65583.1(c)(1)

Activity Type	Affordability by Household Incomes				(4) The Description should adequately document how each unit complies with subsection (c)(7) of Government Code Section 65583.1
	Extremely Low - Income*	Very Low - Income	Low - Income	TOTAL UNITS	
(1) Rehabilitation Activity	0	1	0	1	Owner-Occupied units receiving a Housing Assistance Rehabilitation Program (HARP) loan from the County of Fresno for housing rehabilitation
(2) Preservation of Units At-Risk	0	0	0	0	
(3) Acquisition of Units	0	0	0	0	
(5) Total Units by Income	0	1	0	1	

\* Note: This field is voluntary



**Table A3**  
**Annual building Activity Report Summary for Above Moderate-Income Units**  
**(not including those units reported on Table A)**

	1. Single Family	2. 2 - 4 Units	3. 5+ Units	4. Second Unit	5. Mobile Homes	6. Total	7. Number of infill units*
No. of Units Permitted for <b>Moderate</b>	44	0	0	0	10	54	NA
No. of Units Permitted for <b>Above Moderate</b>	71	0	0	0	0	71	NA

\* Note: This field is voluntary

**Table B**  
**Regional Housing Needs Allocation Progress**

**Permitted Units Issued by Affordability**

Enter Calendar Year starting with the first year of the RHNA allocation period. See Example.												Total Units to Date (all years)	Total Remaining RHNA by Income Level
Income Level		RHNA Allocation by Income Level	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9		
Very Low	Deed Restricted	460											426
	Non-deed restricted		22	12								34	
Low	Deed Restricted	527											302
	Non-deed restricted		199	26								225	
Moderate	Deed Restricted	547											-200
	Non-deed restricted		693	54								747	
Above Moderate		728	1,418	71								1,489	-761
Total RHNA by COG. Enter allocation number:		2,262											
Total Units ▶ ▶ ▶			2,332	163								2,495	-233
Remaining Need for RHNA Period ▶ ▶ ▶ ▶ ▶													

Note: units serving extremely low -income households are included in the very low -income permitted units totals.

**Table C**  
**Program Implementation Status**

Program Description (By Housing Element Program Names)	Housing Programs Progress Report - Government Code Section 65583. Describe progress of all programs including local efforts to remove governmental constraints to the maintenance, improvement, and development of housing as identified in the housing element.			
	Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation

SEE ATTACHED

**The information required for Table C above is found in Appendix B of this APR (pp. 137 – 181).**

## Appendix C

### List of General Plan Goals

Listed below are the 46 goals from the first six elements of the 2000 General Plan Policy Document and the 6 goals from the seventh element — the 2015-2023 Housing Element.

The County uses a system of letters or numbers to identify each of these 52 goals.

ED	- A, B, C	(for the 3 goals in the Economic Development Element)
LU	- A, B, C, D, E, F, G, H	(for the 8 goals in the Agriculture and Land Use Element)
TR	- A, B, C, D, E, F	(for the 6 goals in the Transportation and Circulation Element)
PF	- A, B, C, D, E, F, G, H, I, J	(for the 10 goals in the Public Facilities and Services Element)
OS	- A, B, C, D, E, F, G, H, I, J, K, L	(for the 12 goals in the Open Space and Conservation Element)
HS	- A, B, C, D, E, F, G	(for the 7 goals in the Health and Safety Element)
Goal	1, 2, 3, 4, 5, 6	(for the 6 goals in the Housing Element)

For the sake of brevity, the 52 goals are abridged. To illustrate, printed below are both the full text of the first goal in the General Plan, Goal ED-A, and its abridged form.

#### Goal ED-A.A

Full Text: *“To increase job creation through regional leadership, agricultural productivity, and development of high-value-added processing firms.”*

Abridged Form: Increase job creation.

For easy reference, the 52 goals are also numbered 1 - 52.

### Goals of the 2000 General Plan and the 2015-2023 Housing Element

- 1 Job Creation**  
ED-A Increase job creation.
- 2 Economic Base Diversification**  
ED-B Diversify the county’s economic base.
- 3 Labor Force Preparedness**  
ED-C Improve labor force preparedness.
- 4 Agriculture**  
LU-A Promote the long-term conservation of agricultural lands.
- 5 Westside Rangelands**  
LU-B Preserve the unique and sensitive character of the Westside rangelands.
- 6 River Influence Areas**  
LU-C Preserve, protect and enhance river environments as a multiple-use, open space resource.
- 7 Westside Freeway Corridor**  
LU-D Promote agricultural uses, protect scenic views and provide for commercial uses that cater to travelers.
- 8 Non-Agricultural Rural Development**  
LU-E Provide for the development of areas already designated for rural-residential development.
- 9 Urban Development Patterns**  
LU-F Encourage mixed-use pedestrian and transit-oriented development.

- 10 Urban, Fringe Area and Rural Community Development**  
LU-G Direct urban development within city spheres of influence to existing cities.
- 11 General and Administrative provisions**  
LU-H Provide for the development of mobile homes, home occupations and second dwellings.  
Provide for the effective and systematic implementation of the General Plan.
- 12 Streets and Highways**  
TR-A Plan and provide a unified, coordinated and cost-efficient countywide street and highway system.
- 13 Transit**  
TR-B Promote a safe and efficient mass transit system.
- 14 Transportation Systems Management**  
TR-C Reduce travel demand and maximize the efficiency of the County's transportation facilities.
- 15 Bicycle Facilities**  
TR-D Plan and provide a safe, continuous and easily accessible bikeway system.
- 16 Rail Transportation**  
TR-E Plan for a safe, efficient and environmentally-sound rail system.
- 17 Air Transportation**  
TR-F Promote the maintenance and improvement of general and commercial aviation facilities.
- 18 General Public Facilities and Services**  
PF-A Ensure the timely development of public facilities and maintain an adequate level of service.
- 19 Funding**  
PF-B Ensure that facility and service standards are achieved and maintained through equitable funding methods.
- 20 Water Supply and Delivery**  
PF-C Ensure the availability of an adequate and safe water supply.
- 21 Wastewater Collection, Treatment and Disposal**  
PF-D Ensure adequate wastewater collection and treatment and the safe disposal of wastewater.
- 22 Storm Drainage**  
PF-E Provide efficient, cost-effective drainage and flood control.
- 23 Landfills and Solid Waste Processing Facilities**  
PF-F Ensure the safe and efficient disposal or recycling of solid waste.
- 24 Law Enforcement**  
PF-G Protect life and property and ensure the prompt and efficient provision of law enforcement.
- 25 Fire Protection and Emergency Medical Services**  
PF-H Ensure the prompt and efficient provision of fire and emergency medical facilities and services.
- 26 School and Library Facilities**  
PF-I Provide for the educational needs of Fresno County, including the provision for libraries.
- 27 Utilities**  
PF-J Provide efficient and cost-effective utilities.
- 28 Water Resources**  
OS-A Protect and enhance the water quality/quantity of Fresno County's streams, creeks and groundwater basins.
- 29 Forest Resources**  
OS-B Preserve, protect and maintain healthy, sustainable forest resources and ecosystems.
- 30 Mineral Resources**  
OS-C Conserve areas containing significant mineral deposits and oil and gas resources.  
Promote the reasonable, safe and orderly extraction of mineral resources.
- 31 Wetland and Riparian Areas**  
OS-D Protect the aesthetics, water quality, floodplain, ecology, and recreation values of wetland and riparian areas.

- 32 Fish and Wildlife Habitat**  
OS-E Help protect, restore and enhance habitats that support fish and wildlife species.
- 33 Vegetation**  
OS-F Preserve and protect valuable vegetation resources.
- 34 Air Quality**  
OS-G Improve air quality and minimize the adverse effects of air pollution.
- 35 Parks and Recreation**  
OS-H Designate land for and promote the development and expansion of public and private recreational facilities.
- 36 Recreational Trails**  
OS-I Develop a system of hiking, riding and bicycling trails and paths.
- 37 Historical, Cultural and Geological Resources**  
OS-J Identify, protect and enhance historical, archeological, paleontological, geological and cultural sites.
- 38 Scenic Resources**  
OS-K Conserve, protect and maintain the scenic quality of Fresno County.
- 39 Scenic Roadways**  
OS-L Conserve, protect, and maintain the scenic quality of land and landscapes adjacent to scenic roads.
- 40 Emergency Management and Response**  
HS-A Protect public health and safety from the effects of natural or technological disasters.
- 41 Fire Hazards**  
HS-B Minimize loss of life, injury and damage to both property and natural resources from fire hazards.
- 42 Flood Hazards**  
HS-C Minimize the loss of life, injury and damage from flood hazards.
- 43 Seismic and Geological Hazards**  
HS-D Minimize the loss of life, injury and property damage from seismic and geologic hazards.
- 44 Airport Hazards**  
HS-E Minimize public exposure to high noise levels and safety hazards near airports.
- 45 Hazardous Materials**  
HS-F Minimize the loss of life, injury, illness and damage to property from the presence of hazardous materials.
- 46 Noise**  
HS-G Protect noise-sensitive uses from harmful or annoying noise levels.

## Goals in the 2015-2023 Housing Element

- 47 New Housing Development**  
Goal 1 Facilitate and encourage a range of housing types to meet the needs of residents.
- 48 Affordable Housing**  
Goal 2 Encourage and facilitate the development of affordable housing.
- 49 Housing and Neighborhood Conversion**  
Goal 3 Improve and maintain the quality of housing and residential neighborhoods.
- 50 Special Needs Housing**  
Goal 4 Provide a range of housing types and services for households with special needs.
- 51 Fair and Equal Housing Opportunities**  
Goal 5 Promote housing opportunities for all residents regardless of age, race, religion, sex, marital status, ancestry, national origin, disability or economic status.
- 52 Energy Conservation and Sustainable Development**  
Goal 6 Encourage energy efficiency in all new and existing housing.

## APPENDIX D

### List of Significant and Unavoidable Adverse Impacts Of the 2000 General Plan

The Environmental Impact Report for the adoption of the 2000 General Plan concluded that with the best mitigation available, the following impacts would nonetheless remain significant and unavoidable.

#### **Public Services**

- Inability to meet the demand for police and fire protection and other public services.
- Inability to meet the demand for recreation facilities (parks) and library services.

#### **Transportation and Circulation**

- Operation of roadway segments at unacceptable levels of service.
- Reduction in the ability to maintain adequate pavement conditions on rural roadways.
- Inability to meet the demand for transit services.
- Inability to meet the demand for bicycle facilities.

#### **Agricultural Resources**

- Permanent loss of important farmland.
- Significant reduction in agricultural production.

#### **Water Resources**

- Demand for water exceeding available supply, resulting in overdraft conditions.
- Demand for water exceeding available supply, resulting in adverse effects on groundwater recharge potential.
- Exacerbation of groundwater overdraft conditions, resulting in land subsidence.
- Alteration of the rate and direction of the flows of contaminated groundwater.

#### **Biological Resources**

- Degradation of riparian and aquatic habitat.
- Loss of wetland and grassland habitat.
- Loss of habitat for special-status wildlife and plant species.

#### **Mineral Resources**

- Reduction of the amount of land available for mineral resource extraction.

#### **Historical Resources**

- Devaluation, disturbance, or destruction of unidentified subsurface prehistoric resources and historic sites.

#### **Air Resources**

- Increase in air pollution caused by mobile and stationary sources.

#### **Wastewater and Hazardous materials**

- Demand for wastewater treatment beyond the capacities of existing facilities.
- Increase in the use of hazardous materials and an increase in the generation of hazardous waste.

#### **Storm Drainage and Flooding**

- Increase in stormwater runoff and the potential for downstream flooding.

#### **Noise**

- Permanent increase in ambient noise levels that could affect sensitive receptors.

#### **Esthetics**

- Permanent alteration of the existing visual character of the region and/or visual access to scenic resources.
- Introduction of new sources of light and glare into development areas and surrounding rural areas.

To lessen the adverse impacts listed above (but not to a level of insignificance), 304 policies in 31 sections of the 2000 Policy Document were adopted as environmental mitigation measures. There is no evidence in the County's APRs to show that the County has ever systematically monitored the implementation of these mitigation measures.

The 304 policies (listed below) are found in the following five General Plan elements: *Agriculture and Land Use Element, Transportation and Circulation Element, Public Facilities and Services Element, Open Space and Conservation Element, and Health and Safety Element.* (None of the policies in the *Economic Development Element* or the *Housing Element* serve as mitigation measures.)

**Section            Individual Policies Adopted as Environmental Mitigation Measures for the 2000 General Plan**

LU-A	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20
LU-B	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14
LU-C	2, 3, 4, 5
LU-D	Ø
LU-E	9, 15, 17, 18, 22
LU-F	Ø
LU-G	1, 2, 4, 5, 6, 7, 8, 9, 13, 14, 15, 16
LU-H	9, 10
TR-A	2, 4, 5, 6, 7, 9, 10, 13, 14, 15, 17
TR-B	1, 2, 3, 4
TR-C	Ø
TR-D	1, 2, 4, 5
TR-E	Ø
TR-F	Ø
PF-A	1, 2, 3
PF-B	Ø
PF-C	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30
PF-D	1, 2, 3, 4, 5, 6, 7
PF-E	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21
PF-F	Ø
PF-G	1, 2, 3, 4, 5
PF-H	1, 2, 3, 4, 5, 6, 9, 10
PF-I	Ø
PF-J	Ø
OS-A	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28
OS-B	2
OS-C	1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20
OS-D	1, 2, 3, 4, 5, 6, 7, 8
OS-E	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 16, 17, 18, 19
OS-F	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
OS-G	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16
OS-H	2, 3, 4
OS-I	Ø
OS-J	1, 2, 3, 4, 5, 6, 7, 8
OS-K	1, 2, 3, 4
OS-L	4
HS-A	1, 2, 3
HS-B	Ø
HS-C	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13
HS-D	6, 9, 10, 11, 12, 14
HS-E	Ø
HS-F	1, 2, 3, 4, 5, 6, 7, 8
HS-G	1, 2, 3, 4, 5, 6, 7, 8, 9

## APPENDIX E

### List of Program Deliverables and Calculation of Successful Implementation

Below is a list of the deliverables for the 121 sections of the first 6 elements of the General Plan and the 63 subcomponents (objectives) in the 19 programs in the Housing Element.

The list of programs is color coded per the explanations provided on pages 25 and 139.

<b>2000 ECONOMIC DEVELOPMENT ELEMENT</b>		
No.	ID No.	Deliverable(s)
1	ED-A.A	Creation of a staff position to coordinate countywide economic development.
2	ED-A.B	Creation of an Action Team to coordinate countywide economic development.
3	ED-A.C	5-year evaluations of the success of the County's Comprehensive Economic Development Strategy.
4	ED-A.D	Creation of criteria for the location of value-added agricultural facilities.
5	ED-A.E	Establishment of a set of guidelines for the analysis of economic impacts within staff reports.
6	ED-A.F	Contract with the Economic Development Corporation for the marketing of county produce.
7	ED-A.G	Determination of the existence of capital deficiencies for farmers shifting to production modes that create greater employment; redirection of existing funds should such deficiencies be found.
8	ED-B.A	Assemblage of a group of service providers to assess telecommunications infrastructure.
9	ED-B.B	Delivery to businesses of a comprehensive package of assistance regarding available technologies.
10	ED-B.C	Creation of a roundtable of financial institutions to improve access to capital for non-agricultural businesses.
11	ED-B.D	Creation of a planning process to identify additional recreational opportunities countywide.
12	ED-B.E	Evaluation of business marketing programs and funding of the Visitor and Convention Bureau.
13	ED-C.A	Development of a countywide workforce preparation system.
14	ED-C.B	Development of a CalWORKs labor pool skills inventory.
15	ED-C.C	Improvement of an employment and retention tracking system for CalWORKs recipients.
16	ED-C.D	Assistance to the Fresno Economic Development Corporation, placement agencies and businesses for the assessment of the work availability and readiness of CalWORKs recipients.
17	ED-C.E	Collaboration with various agencies and institutions to plan and fund a wide variety of services designed to promote employment.
18	ED-C.F	Identification of employee skills required by the business clusters and industries targeted for expansion, attraction and development.

## 2000 AGRICULTURE AND LAND USE ELEMENT

No.	ID No.	Deliverable(s)
19	LU-A.A	Amendment of the Zoning Ordinance to ensure conformity with the Agriculture and Land Use Element of the 2000 update of the General Plan.
20	LU-A.B	Evaluation of parcel sizes necessary for sustained agriculture and subsequent amendment of the Zoning Ordinance.
21	LU-A.C	Creation of a set of guidelines for agricultural buffers.
22	LU-A.D	Assessments of agricultural land preservation programs.
23	LU-A.E	Implementation of the County's Right-to-Farm Ordinance; dissemination of information to the real estate industry.
24	LU-A.F	Development and implementation of a public outreach program for agricultural land conservation.
25	LU-A.G	Active search for grants for conservation easements.
26	LU-A.H	Creation of a program to establish criteria for prioritizing funding for agricultural easements.
27	LU-A.I	Assessment of agricultural land values; creation of an agricultural quality scale system.
28	LU-A.J	Annual inventory of lot size exceptions for agricultural areas.
29	LU-B.A	Annual inventory of lot size exceptions for Westside rangelands.
30	LU-C.A	Update of the Kings River Regional Plan.
31	LU-C.B	Assistance with the implement the San Joaquin River Parkway Master Plan.
32	LU-D.A	Amendment of the Zoning Ordinance to implement provisions in the 2000 update of the General Plan regarding the Westside Freeway Corridor.
33	LU-F.A	Adoption of incentives/disincentives to support compact urban development and infill.
34	LU-F.B	Amendment of the Zoning Ordinance and Subdivision Ordinance to implement provisions in the 2000 update of the General Plan regarding pedestrian and transit-oriented development.
35	LU-G.A	Amendment of the Zoning Ordinance to facilitate moderate increases in housing density.
36	LU-G.B	Review of all annexation proposals, including formal County protests when annexations are inconsistent with either the cities' general plans or the County's General Plan.
37	LU-H.A	Adoption of a Friant-Millerton Regional Plan.
38	LU-H.B	Annual reports of meetings with the county's 15 cities regarding planning and growth issues.
39	LU-H.C	Creation of a set of guidelines for creating or updating land use plans.
40	LU-H.D	Annual reviews of the General Plan.
41	LU-H.E	5-year reviews the General Plan.
42	LU-H.F	Comprehensive amendment of the Zoning Ordinance to ensure conformity with the 2000 update of the General Plan.



## 2000 TRANSPORTATION AND CIRCULATION ELEMENT

No.	ID No.	Deliverable(s)
43	TR-A.A	5-year updates of the County's Road Improvement program (RIP).
44	TR-A.B	Consideration of the adoption of a traffic fee ordinance.
45	TR-A.C	Pursuit of new funding sources for transportation improvements.
46	TR-A.D	Coordination of transportation planning with LAFCo, Caltrans, the cities and neighboring counties.
47	TR-A.E	Update of Improvement Standards for County development projects, including private roads dedicated to public use.
48	TR-B.A	Periodic update of short-range transit plans.
49	TR-B.B	Encouragement to transit providers and the Fresno Council of Governments to prepare, adopt and implement a long-range strategic transit master plan for the county or subareas of the county.
50	TR-B.C	Pursuit of transit funding through the Fresno Council of Governments and the Fresno County Rural Transit Agency.
51	TR-B.D	Identification of/acquisition of rail right-of-way needs in designated transit corridors.
52	TR-B.E	Preparation and adoption of land use and design standards that promote transit accessibility and use within designated urban transit corridors.
53	TR-B.F	Identification of the need for additional or expanded park-and-ride lots.
54	TR-D.A	Update of the County's Regional Bikeways Plan to ensure conformity with the Circulation Diagram and Standards section of the 2000 update of the General Plan.
55	TR-D.B	Encouragement of the use of bikeways and the search for funding for their maintenance.
56	TR-D.C	Design of road construction projects to incorporate bikeways.
57	TR-D.D	Use of Caltrans standards for the construction of bike lanes.
58	TR-D.E	Provision for facilities that link bicycle use with other modes of transportation, including the provision of bicycle racks or bicycle space on buses, as well as parking or lockers for bicycles at transportation terminals.
59	TR-E.A	Preservation of railroad rights-of-way for future rail expansion or other transportation facilities.
60	TR-E.B	Use of appropriate zoning in designated rail corridors to ensure preservation of rail facilities for future rail use.
61	TR-E.C	Participation on the Fresno Council of Governments Rail Committee.

## 2000 PUBLIC FACILITIES AND SERVICES ELEMENT

No.	ID No.	Deliverable(s)
62	PF-A.A	Preparation of infrastructure plans or area facility plans for new or expanded community or specific plans.
63	PF-B.A	Adoption of a Capital Improvement Program (CIP) for the design and construction of County facilities.
64	PF-B.B	Adoption of ordinances specifying methods for new development paying for new capital facilities and expanded services.
65	PF-C.A	Development of a process for resolving water supply problems.
66	PF-C.B	Adoption of a well construction/deconstruction ordinance.
67	PF-C.C	Preparation of water master plans for areas undergoing urban growth.
68	PF-C.D	Creation of a tiered water pricing structure for County Service Areas and Waterworks Districts.
69	PF-C.E	Establishment of water demand standards for new development.
70	PF-C.F	Establishment of a regulatory process for transferring surface water out of the county and substituting groundwater for the transferred surface water.
71	PF-C.G	Development and update of a list of technologies and methods to maximize the beneficial use of water resources.
72	PF-D.A	Preparation of sewer master plans for urban growth areas.
73	PF-E.A	Adoption of regulations and programs to implement required state and federal stormwater quality programs.
74	PF-F.A	Accommodation of the required collection and storage of recyclables by new commercial, industrial and multi-family residential development.
75	PF-G.A	Adoption of a master plan for the location of sheriff substations.
76	PF-H.A	Adoption of fire protection master plans or fire facilities for discretionary development projects.
77	PF-H.B	In cooperation with the California Department of Forestry and local fire protection agencies, the consolidation and standardization of fire protection services.
78	PF-I.A	Identification of the location for new or expanded school facilities as regional, community and specific plans are updated.
79	PF-I.B	Identification of the need for new or expanded library facilities as regional, community and specific plans are updated.

## 2000 OPEN SPACE AND CONSERVATION ELEMENT

No.	ID No.	Deliverable(s)
80	OS-A.A	Development of a water sustainability plan.
81	OS-A.B	Development of a surface water and groundwater database.
82	OS-A.C	Development of a groundwater monitoring program with annual reporting to the Board of Supervisors.
83	OS-A.D	Development of land use plans to identify and preserve groundwater recharge areas.
84	OS-B.A	Evaluation of Forest Practice Rules regarding clearcutting, prescribed burning and the protection of various resources: soil, water and biological, including the protection of old growth forests.
85	OS-B.B	Encouragement to the U.S. Forest Service and the California Department of Forestry and Fire Protection to complete an inventory of old growth forests in Fresno County.
86	OS-B.C	Encouragement to the U.S. Forest Service and the California Department of Forestry and Fire Protection to identify potential impacts on, and the need for preservation of, old growth forests.
87	OS-B.D	Request to the California Department of Forestry and Fire Protection to include in its Notices of Intent to Harvest Timber educational materials for residents on the Forest Practice Act, Forest Practice Rules and the Timber Harvest Plan review process.
88	OS-D.A	Assistance to various agencies and non-profit conservation organizations in their acquisition of creek corridors, wetlands and areas rich in wildlife or of fragile ecological structure.
89	OS-D.B	Adoption of an ordinance identifying riparian protection zones and allowable activities therein.
90	OS-E.A	Compilation and regular update of ecological inventories for areas of environmental significance.
91	OS-E.B	Maintenance of maps identifying significant habitat for important fish and game species.
92	OS-F.A	Compilation and regular updates of lists of state and federal rare, threatened and endangered plant species.
93	OS-F.B	Dissemination of the Fresno County Oak Management Guidelines to landowners with oak woodland habitat.
94	OS-G.A	Adoption of procedures for performing air quality impact analyses based on a review of the <i>Guide for Assessing and Mitigating Air Quality Impacts</i> published by the Air Pollution Control District.
95	OS-G.B	Adoption of a package of programs to reduce County employee work-related vehicular trips.
96	OS-G.C	Amendment of the Subdivision and Grading Ordinances and Development Standards to address dust control.
97	OS-H.A	Inventory of recreation areas in the county; possible design of a parks and recreation master plan.
98	OS-H.B	Consideration of contracting with existing entities or forming new County Service Areas for the development and maintenance of parks.
99	OS-I.A	Preparation of a Recreation Trails Master Plan.
100	OS-I.B	Identification of potential land use controls to reserve areas for trails.

101	OS-I.C	Adoption of an ordinance to regulate the use of multi-purpose trails.
102	OS-J.A	Adoption of an ordinance to protect archaeological, historical and geographical sites.
103	OS-L.A	Preparation of a landscape master plan for the Highway 99 corridor.
104	OS-L.B	Application for scenic highway designation for eligible segments of state highways (in consultation with Caltrans).

## 2000 HEALTH AND SAFETY ELEMENT

No.	ID No.	Deliverable(s)
105	HS-A.A	Maintenance of local, state and federal agreements coordinating disaster relief.
106	HS-A.B	Monitoring and evaluation of County emergency planning, operations and training capabilities.
107	HS-A.C	Evaluation of County-owned safety and emergency management facilities and public utility systems for susceptibility to flood damage.
108	HS-A.D	Implementation of programs that inform the general public of emergency and disaster response procedures.
109	HS-B.A	Review of the design of all new buildings and structures to ensure that they are constructed to state and local standards.
110	HS-C.A	Participation in the Federal Flood Insurance Program and the update of flood hazard maps.
111	HS-C.B	Implementation of the County's Floodplain Management Ordinance.
112	HS-C.C	Review of dam failure evacuation plans; dissemination of information on dam failure preparedness.
113	HS-D.A	Regular review of information published by the California Division of Mines and Geology for the purpose of updating County maps and the General Plan Background Report.
114	HS-D.B	Inventory of unreinforced masonry structures constructed prior to 1948.
115	HS-D.C	Development of a public awareness program to aid in the identification and mitigation of unreinforced masonry structures.
116	HS-E.A	Referral of projects within the Airport Review Area to the Fresno County Airport Land Use Commission.
117	HS-F.A	Review of discretionary uses which involve hazardous materials or generate hazardous wastes.
118	HS-F.B	Investigation of funding for site acquisition for a permanent household waste facility.
119	HS-F.C	Review of plans to mitigate soil or groundwater contamination for redevelopment or infill projects.
120	HS-G.A	Amendment of the Noise Ordinance to ensure conformity with the General Plan.
121	HS-G.B	Development of a noise control program that includes an ordinance on effective noise control.

## 2015-2023 HOUSING ELEMENT

No.	ID No.	Deliverable(s)
122	H-1.1	Department of Public Works and Planning coordination of the Countywide Fifth Cycle Housing Element Committee meetings.
123	H-1.2	Countywide collaboration on housing program implementation and regional housing issues.
124	H-1.3	Biannual meetings of the Countywide Housing Element Technical Committee to evaluate the implementation of Housing Element programs and the identification of additional housing needs.
125	H-1.4	Annual meeting of the Countywide Housing Element Technical Committee with the California Department of Housing and Community Development and other agencies to discuss funding opportunities and challenges with program implementation.
126	H-1.5	Periodic meetings of the Countywide Housing Element Technical Committee with Fair Housing of Central California to discuss fair housing issues and opportunities to educate the public.
127	H-1.6	Advocacy of the Countywide Housing Element Technical Committee in support of grant funding for affordable housing and infrastructure improvements.
128	H-1.7	Search for partnerships with agencies, housing developers, community stakeholders, and agricultural employers to explore options for increasing the availability of farmworker housing.
129	H-2.1	Review and revision of the standards for annexation contained in Memorandums of Understanding between the County and the cities during the Housing Element planning period.
130	H-3.1	Completion of technical amendments to the Zoning Ordinance to achieve internal consistency with the General Plan.
131	H-3.2	Annual update of the inventory of residential land resources.
132	H-3.3	Monitoring the inventory of residential land resources to ensure that the County has residential land resource capacity consistent with its share of the region's housing needs.
133	H-3.4	Designation and zoning of sites adequate to meet the special housing needs specified in the County's Regional Housing Needs Allocation (RHNA).
134	H-3.5	Encouragement of a variety of housing types through implementation of the General Plan and through mechanisms encouraging housing affordability.
135	H-3.6	Directing interested residential developers to community plan and specific plan areas that have water and sewer capacity or where water and sewer providers can provide capacity.
136	H-3.7	Meeting(s) with developers to discuss constraints and opportunities on Trailer Park (TP) zoned sites; establishment of incentives and procedures to promote development of such sites.
137	H-3.8	Participation in the development of the next Regional Housing Needs Allocation Plan.
138	H-4.1	Development and implementation of a formal evaluation procedure to ensure sufficient residential capacity to meet the County's Regional Housing Needs Allocation.
139	H-4.2	Annual monitoring of the effectiveness of non-residential zones to facilitate residential development.
140	H-4.3	Accommodation of housing facilities at least 16 units in size (at densities of least 20 units per acre) — in the event that rezoning/upzoning is required to meet a RHNA shortfall.

141	H-5.1	Assistance to interested developers/property owners to identify opportunities for lot consolidation or lot splitting.
142	H-5.2	Streamlining of the processing of requests for lot consolidation and lot splitting.
143	H-5.3	Annual evaluation of the effectiveness of the County's efforts to facilitate lot consolidation of small sites for residential development.
144	H-5.4	Encouragement of the use of master plans/specific plans to provide a cohesive development strategy for large lots.
145	H-6.1	At least semi-annual coordination with independent service providers to assess development trends, needs for infrastructure and services and plans to meet the County's RHNA.
146	H-6.2	Assistance to County Service Districts to address infrastructure and service deficiencies.
147	H-6.3	Search for funding for County Service Districts to expand infrastructure and services consistent with the County's General Plan and community plan policies.
148	H-6.4	Meeting(s) with developers and community stakeholders in support of funding sources, including CDBG and/or HOME funds, to reduce the costs of development (i.e., infrastructure improvements).
149	H-6.5	Annual pursuit of funding opportunities for community plan updates to promote the development of active transportation and access to services and amenities within existing communities.
150	H-6.6	Distribution of adopted Housing Element to service providers serving unincorporated communities.
151	H-7.1	Offer of incentives to facilitate the development of affordable housing opportunities for very-low and extremely-low income households, as well as special needs populations.
152	H-7.2	Search for partnerships and regular meetings with agencies, housing developers, community stakeholders and employers to pursue opportunities for providing affordable housing.
153	H-7.3	Monitoring the websites of the California Department of Housing and Community Development and HUD for Notices of Funding Ability and preparation or support of applications for funding affordable housing for lower-income households.
154	H-7.4	Encouragement to agencies and housing developers to apply for USDA Rural Development loans and grants and funding from the California Department of Housing and Community Development.
155	H-7.5	Streamlining and improving efficiencies in planning, permit approval and building inspection.
156	H-7.6	Establishment of a program via the Internet that accommodates submittal and issuance of permits pertaining to the development of affordable housing.
157	H-8.1	Search for partnerships with agencies, housing developers, community stakeholders and agricultural employers to explore options for the location of farmworker housing.
158	H-8.2	Encouragement to agencies and housing developers to apply for funding for farmworker housing.
159	H-8.3	Annual monitoring of the status of farmworker housing and evaluation of the effectiveness of the County's efforts to facilitate the provision of farmworker housing.
160	H-9.1	Monitoring affordable housing projects to determine if they are at risk of converting to market-rate housing, and if found to be at risk, engagement in a set of actions to address the situation.
161	H-10.1	Completion of a comprehensive Zoning Ordinance update to increase allowable densities to 20 units per acre in R2, R2-A, R3, R3-A, R4, C4 and RP Districts.
162	H-10.2	Addressing the provision of Single-Room Occupancy (SRO) housing as part of a comprehensive Zoning Ordinance update.




163	H-10.3	Examination of alternatives to requiring discretionary approval for the development of multi-family housing in the C-4 Zone District; expediting the review and processing of multi-family housing development applications.
164	H-10.4	Consideration of the establishment of a discretionary permit requirement for new agricultural operations and farm labor housing in residential zones.
165	H-10.5	Annual review of the effectiveness of the Zoning Ordinance; amendment of the Zoning Ordinance to remove or mitigate potential constraints to the development of housing.
166	H-11.1	Annual monitoring of public facilities impact fees to ensure they do not unduly constrain housing development (should the Board of Supervisors decide to reinstate the fees).
167	H-12.1	Rehabilitation assistance to 8 low-income households during the planning period (2015 – 2023).
168	H-13.1	Assistance for the rehabilitation of 4 rental housing units during the planning period (2015 – 2023).
169	H-14.1	Enforcement of property maintenance standards; abatement of substandard structures through code enforcement and housing rehabilitation programs.
170	H-15.1	Assistance to 11 low-income households as part of the 11-unit affordable housing project in Riverdale during the planning period (2015 – 2023).
171	H-16.1	Promotion of available homebuyer resources on the County's website and at public counters.
172	H-16.2	Annual review and pursuit of funding resources to provide assistance to homebuyers.
173	H-17.1	Ongoing support for and encouragement of the provision of Housing Choice Vouchers.
174	H-17.2	Encouragement of landlords to accept Housing Choice Vouchers by registering their properties with the Housing Authority; referral of households/homeowners to the Fresno Housing Authority.
175	H-17.3	Dissemination of information regarding participation in the Housing Choice Vouchers program.
176	H-18.1	Ongoing promotion and implementation of the County's Go Green initiatives.
177	H-18.2	Consideration of the inclusion of design standards for new development that encourage alternative transportation as part of an update of the Zoning Ordinance.
178	H-18.3	Promotion and support for Pacific Gas and Electric Company programs that provide energy efficiency rebates.
179	H-18.4	Incorporation of conservation measures into housing rehabilitation programs.
180	H-18.5	Expeditious review and approval of residential alternative energy devices.
181	H-19.1	Annual presentation of outreach and education workshops regarding fair housing for lenders, real estate professionals, housing providers, community stakeholders and the community at large.
182	H-19.2	Distribution of information on fair housing rights, available services and responsible agencies to libraries, community services districts offices and public counters; posting of the same on the County's website.
183	H-19.3	Referral of fair housing complaints to the U.S. Department of Housing and Urban Development, the California Department of Fair Employment and Housing, the Fair Housing Council of Central California and other housing agencies.
184	H-19.4	Every 5 years, a Fair Housing Assessment.

# Calculation of the Success of Program Implementation

## For the 2015-2023 General Plan Housing Element

Below is the data used to calculate the County’s success in implementing each of the 19 programs in its 2015-2023 Housing Element. The data, based on information gleaned from the County’s 2017 Annual Progress Report (APR), was obtained from Appendix B — Progress toward Implementing the Programs and Objectives of the Housing Element — pages 137 through 181 above.

To arrive at a calculation of the overall success of the implementation of each of the 19 Housing Element programs, it was necessary to average the County’s success in implementing the objectives within each program. For example, the overall success of the implementation of Program H-3 — with its 8 objectives distributed across row 3 below — was determined to be poor because the County’s 2017 APR reported good implementation for 4 of the objectives, poor implementation for 2 objectives and no implementation for the other 2 objectives. Therefore, the report of the success for Program H-3 was determined to be, on average, poor.

Color Codes	Programs	Green	Orange	Red	Overall Success
	 <b>Green</b> Good evidence of successful implementation during 2017.	H-1	0	7	0
 <b>Orange</b> Poor evidence of successful implementation during 2017 or only partial success in implementation.	H-2	1	0	0	Good
	H-3	4	2	2	Poor
 <b>Red</b> No evidence by which to confirm successful implementation during 2017 or evidence that implementation was not successful or not initiated.	H-4	1	0	2	Poor
	H-5	0	1	3	None
	H-6	1	1	4	Poor
	H-7	0	4	2	Poor
	H-8	0	1	2	None
	H-9	1	0	0	Good
	H-10	0	4	1	Poor
	H-11	1	0	0	Good
	H-12	1	0	0	Good
	H-13	0	1	0	Poor
	H-14	0	1	0	Poor
	H-15	0	0	1	None
	H-16	1	1	0	Poor
	H-17	1	0	2	Poor
	H-18	1	2	2	Poor
	H-19	3	1	0	Good
	Totals	16	26	21	63 Objectives



## For All Seven General Plan Elements (Including the Housing Element)

The League of Women Voters of Fresno (**League**) evaluated Fresno County's 2017 APR, coming to conclusions very different for those offered by the County.

With an aim to improve transparency and accuracy, the League decided to prepare its own APR for 2017. The League found that the County's 2017 report of a 90% \* success rate for the implementation of General Plan programs was far from accurate. The rate of success was closer to 33%. More specifically, the League found, through very careful analyses, that the County's 2017 APR had demonstrated good implementation of 46 programs (33%), poor implementation of 44 programs (31%) and no implementation or failed implementation of 50 programs (36%).

Listed below are tabulations based on information taken from Appendix A (*Implementation of the First Six Elements in the General Plan*, pp. 24-136 above) and Appendix B (*Implementation of the General Plan Housing Element*, pp. 137-181 above). (See pages 25 and 139 for explanations of the color coding.)

Tabulation of the County's Success In Implementing 140 General Plan Programs During 2017				
	Green	Orange	Red	Number of Programs in Each Element
Economic Development Element	3	4	11	18
Agriculture and Land Use Element	6	9	9	24
Transportation and Circulation Element	8	10	1	19
Public Facilities and Services Element	7	5	6	18
Open Space and Conservation Element	4	3	18	25
Health and Safety Element	13	2	2	17
Housing Element	5	11	3	19
Totals	46	44	50	140

### Calculations

Color Code	Degree of Success	Number of Programs	Percent
Green	Good	46 out of 140	32.86 %
Orange	Poor	44 out of 140	31.43 %
Red	None	50 out of 140	35.71 %
			100.00 %

\* The County's 2017 APR identified only 14 of 140 programs (10%) as being unsatisfactorily implemented. They were Programs ED-B.A, LU-A.I, LU-C.A, LU-H.A, TR-A.B, PF-B.A, PF-B.B, PF-C.E, PF-G.A, OS-D.B, OS-F.B, OS-H.A, OS-J.A and HS-G.B. (The County did not report any deficiencies in the implementation of the Housing Element.)