

5. Environmental Analysis

5.13 POPULATION AND HOUSING

This section of the Draft Program Environmental Impact Report (Draft PEIR) examines the potential for population and housing impacts of the proposed General Plan on the City of Clovis and its Sphere of Influence (SOI) and Planning Area, including changes in population, employment, and demand for housing. The analysis in this section is based, in part, on sources of information from the following agencies:

- United States Census Bureau
- California Department of Finance
- Fresno Council of Governments

5.13.1 Environmental Setting

5.13.1.1 REGULATORY BACKGROUND

State

California Housing Element Law

California planning and zoning law requires each city and county to adopt a general plan for future growth (California Government Code Section 65300). This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the state level, the Housing and Community Development Department (HCD) estimates the relative share of California's projected population growth in each county based on California Department of Finance (DOF) population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where there is a regional council of governments, the HCD provides the RHNA to the council. The council then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares gives cities and counties the opportunity to comment on the proposed allocations. The HCD oversees the process to ensure that the council of governments distributes its share of the state's projected housing need.

State law recognizes the vital role local governments play in the supply and affordability of housing. To that end, California Government Code requires that the housing element achieve legislative goals to:

- Identify adequate sites to facilitate and encourage the development, maintenance, and improvement of housing for households of all economic levels, including persons with disabilities.
- Remove, as legally feasible and appropriate, governmental constraints to the production, maintenance, and improvement of housing for persons of all incomes, including those with disabilities.
- Assist in the development of adequate housing to meet the needs of low and moderate income households.
- Conserve and improve the condition of housing and neighborhoods, including existing affordable housing.

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- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Preserve for lower income households the publicly assisted multifamily housing developments in each community.

California housing element law (Sections 65580 to 65589 of the California Government Code) requires that each city and county identify and analyze existing and projected housing needs within its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community commensurate with local housing needs.

Regional

Fresno Council of Governments

The Fresno Council of Governments (COG) represents the County of Fresno and cities of Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, and Selma. It is a regional planning agency and serves as a forum for addressing regional issues concerning transportation, the economy, community development, and the environment.

Regional Transportation Plan

Fresno COG's 2011 Regional Transportation Plan (RTP) charts a 25-year course for planning out Fresno County Region's transportation system as population increases and more vehicles and commercial and residential construction follow. The 2011 RTP is organized into four separate elements: Policy Element, Action Element, Air Quality Element, and Financial Element. Goals, policies, and objectives of Fresno COG are outlined in each of these elements. Currently, Fresno COG is preparing its 2014 Regional Transportation Plan/Sustainable Communities Strategy (2014 RTP/SCS), which has a 25-year transportation planning course to 2040. The 2014 RTP/SCS is anticipated to be approved by state and federal agencies and adopted by Fresno COG by summer 2014.

Regional Housing Needs Allocation Plan

The Fresno County Regional Housing Needs Allocation (RHNA) Plan is a state-mandated document, updated every eight years, that helps determine the number of housing units that cities and counties must plan for in the housing element sections of their general plans. The California Department of Housing and Community Development (HCD) allocates RHNA units to Fresno COG, who then develops a methodology to allocate the units to individual jurisdictions within Fresno County. The Fresno COG 2013–2023 RHNA Plan indicates a projected need of 6,263 housing units in the City of Clovis (Sumner 2014).

Local

City of Clovis Housing Element

The Housing Element assesses current and projected housing needs and sets out policies and proposals for the improvement of housing and the provision of adequate sites for housing to meet the needs of all economic

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segments of the City. This element is a stand-alone document that was approved by the California Department of Housing and Community Development in July 2008 and updated in 2010, separately from the rest of the general plan elements. Other general plan elements under the General Plan Update are consistent with the goals and policies of the Housing Element.

5.13.1.2 EXISTING CONDITIONS

Methodology

The Plan Area's demographics are examined in the context of existing and projected population for the Fresno County region and the City of Clovis. Information on population, housing, and employment for the planning area is available from several sources:

- **California Department of Finance.** The DOF prepares and administers California's annual budget. Other duties include estimating population demographics and enrollment projections. DOF's Table E-5, "City/County Population and Housing Estimates," reports on population and housing estimates for the state, counties, and cities, benchmarked to base year 2010.
- **Fresno Council of Governments.** Policies, programs, and employment, housing, and population projections adopted by Fresno COG to achieve regional objectives are expressed in its 2011 RTP and draft 2014 RTP/SCS.
- **United States Census Bureau.** The official United States Census is described in Article I, Section 2 of the Constitution of the United States. It calls for an actual enumeration of the people every 10 years, to be used for apportionment among the states of seats in the House of Representatives. The United States Census Bureau publishes population and household data gathered in the decennial census.

Population Trends

Table 5.13-1 shows population growth trends in the City of Clovis and Fresno County collected by the US Census Bureau and DOF. According to the data, population steadily increased from 2000 to 2004 in the City of Clovis and Fresno County. After 2004, the population continued to increase but at a lower rate. Between the 2000 and 2010 Census, Fresno County experienced a population increase of 16.4 percent, and the City of Clovis grew substantially faster by 39.7 percent. Since the 2010 Census, the DOF estimates the County's population to be 953,179 and the City's population to be 100,091, an increase of 2.4 and 4.7 percent, respectively.

Housing

Housing Trends

According to Table 5.13-2, the rate of housing growth in the City and County gradually grew through the first half of the 2000s and peaked in the middle of the decade. Clovis grew at a slightly higher rate than the rest of Fresno County. From 2006 and on, the housing growth rate dropped in both jurisdictions. Nevertheless, Clovis gained 11,324 dwelling units and Fresno County gained 49,876 dwelling units between 2000 and 2013, an increase

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of approximately 44.8 and 18.4 percent, respectively. Comparing Tables 5.13-1 and 5.13-2, population and housing grew in proportions with each other.

Table 5.13-1 Population Growth Trends in the City of Clovis and Fresno County

Year	City of Clovis		Fresno County	
	Population	Percent Change	Population	Percent Change
2000	68,468	N/A	799,407	N/A
2001	69,992	2.2%	808,611	1.2%
2002	72,514	3.6%	821,809	1.6%
2003	75,805	4.5%	837,256	1.9%
2004	80,111	5.7%	853,057	1.9%
2005	84,552	5.5%	866,058	1.5%
2006	88,239	4.4%	879,128	1.5%
2007	90,155	2.2%	893,088	1.6%
2008	92,484	2.6%	906,521	1.5%
2009	93,629	1.2%	918,560	1.3%
2010	95,631	2.1%	930,450	1.3%
2011	96,848	1.3%	936,089	0.6%
2012	98,377	1.6%	943,493	0.8%
2013	100,091	1.7%	953,179	1.0%

Source: U.S. Census 2000, 2010; DOF 2012, 2013a.

Table 5.13-2 Historical Housing Growth Trends in Clovis and Fresno County

Year	City of Clovis		Fresno County	
	Dwelling Units	Percent Change	Dwelling Units	Percent Change
2000	25,265	NA	270,767	NA
2001	25,733	1.9%	272,924	0.8%
2002	26,585	3.3%	276,473	1.3%
2003	27,614	3.9%	279,945	1.3%
2004	29,146	5.5%	284,435	1.6%
2005	30,973	6.3%	290,831	2.2%
2006	32,567	5.1%	297,519	2.3%
2007	33,497	2.9%	304,200	2.2%
2008	34,296	2.4%	308,314	1.4%
2009	34,747	1.3%	312,860	1.5%
2010	35,226	1.4%	315,094	0.7%
2011	35,679	1.3%	317,057	0.6%
2012	36,105	1.2%	318,755	0.5%
2013	36,589	1.3%	320,643	0.6%

Source: DOF 2012, 2013b.

Note: Unit counts for the years 2000 and 2010 are derived from US Census data; unit counts for other years consist of estimates calculated by DOF. DOF housing unit estimates are based on US Census data that is adjusted by adding new construction and annexations, subtracting demolitions, and adjusting for units lost or gained by conversions.

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Existing Housing Units

The City of Clovis is primarily developed as a single-family community. Table 5.13-3 compiles the housing unit types in both Clovis and Fresno County. According to 2013 data, the majority of housing units is still single-family detached units, and the balance is primarily multifamily units. Other housing types are also identified in the table.

Table 5.13-3 Housing Units in Clovis and Fresno County by Type (2013)

Type	City of Clovis		Fresno County	
	Number of Units	Percent	Number of Units	Percent
Single-Family Detached	25,841	70.6%	215,572	67.2%
Single-Family Attached	762	2.1%	7,436	2.3%
Multifamily (2–4 Units)	3,310	9.0%	33,320	10.4%
Multifamily (5 or More Units)	5,716	15.6%	49,510	15.4%
Mobile Homes	960	2.6%	14,805	4.6%
Totals	36,589	100%	320,643	100%
	Percent Vacant = 5.3%		Percent Vacant = 8.3%	
	Household Size = 2.88		Household Size = 3.18	

Source: DOF 2013b.

Note: DOF housing unit estimates are based on U.S. Census data that is adjusted by adding new construction and annexations, subtracting demolitions, and adjusting for units lost or gained by conversions.

The vacancy rate is approximately 5.3 and 8.3 percent in Clovis and Fresno County, respectively. These vacancy rates are not abnormally high or low, which indicates that the population and housing unit numbers are growing at a similar pace and oversupply is not an issue.

Regional Housing Needs Assessment

The Fresno COG 2013-2023 RHNA indicates a projected need of 6,263 housing units for the City of Clovis by 2023. The 6,263 units are categorized into very low, low, moderate, and above moderate income brackets, as detailed in Table 5.13-4.

Table 5.13-4 City of Clovis 2007–2013 Regional Housing Needs Assessment

Income Category	Household Income	Housing Units	Percent of Total
Very Low	\$16,215–\$27,023	2,321	37.1%
Low	\$27,024–\$43,236	1,162	18.6%
Moderate	\$43,237–\$64,854	1,001	16.0%
Above Moderate	\$64,855+	1,779	28.4%
Total	NA	6,263	100%

Source: Sumner 2014.

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Employment

Employment Trends

The California Employment Development Department provides labor market statistics for the state and different geographic regions of California as a way to analyze California's economic health. Table 5.13-5 illustrates Clovis and Fresno County historical employment trends from 2000 to 2013. The City and county both experienced small yearly increases in employment from 2000 until 2009, when there was a 4 percent decrease in employment in both jurisdictions. Employment decreased in 2009 and 2010 and began to climb in 2011. Clovis and Fresno County experienced a larger increase in employment in 2013. Overall, the City gained 4,500 jobs and Fresno County gained 42,500 jobs between 2000 and 2013.

Table 5.13-5 Historical Employment Growth Trends in Clovis and Fresno County

Year	City of Clovis		Fresno County	
	Employment (Persons)	Percent Change	Employment (Persons)	Percent Change
2000	36,600	NA	347,900	NA
2001	36,600	0.0%	348,200	0.1%
2002	37,500	2.5%	356,900	2.5%
2003	37,800	0.8%	359,100	0.6%
2004	38,200	1.1%	363,500	1.2%
2005	39,000	2.1%	371,200	2.1%
2006	39,800	2.1%	378,500	2.0%
2007	40,300	1.3%	383,400	1.3%
2008	40,500	0.5%	385,200	0.5%
2009	38,900	-4.0%	369,600	-4.0%
2010	38,500	-1.0%	366,300	-0.9%
2011	39,000	1.3%	370,500	1.1%
2012	39,500	1.3%	375,000	1.2%
2013	41,100	4.1%	390,400	4.1%

Source: EDD 2013, 2014.

Note: Estimates are not seasonally adjusted. Employment is defined as the number of individuals, aged 16 years or older, who are working. Existing employment identified in Chapter 4 of this DEIR is based on employment generation calculated from nonresidential building square footage by land use type.

Existing Employment

Based on the 2008–2012 American Community Survey (ACS) conducted by the US Census Bureau, the City's employment is organized by occupation and industry sectors in Table 5.13-6. According to the data, over half of the employees in Clovis work management, business, science, and arts occupations, and sales and office occupations. The largest industry sector during the 2008–2012 period was the educational services, healthcare, and social assistance sector, which accounted for approximately 28 percent of civilian jobs. In total, the City of Clovis has an employed civilian labor force (16 years and older) of 42,024 persons. However, it should be noted that ACS survey estimates have large margins of error. For example, Clovis' total employed civilian labor force of 42,024 persons has a 90 percent margin of error ± 917 persons. Thus, employment analysis for the Clovis Plan Area under the "Jobs-Housing Ratio" subsection uses 2013 employment data from the California Employment Development Department.

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Table 5.13-6 City of Clovis Employment by Sector (2008–2012)

Occupation/Industry	Number	Percent
Occupation		
Management, business, science, and arts occupations	16,391	39.0%
Service occupations	6,957	16.6%
Sales and office occupations	11,355	27.0%
Natural resources, construction, and maintenance occupations	3,643	8.7%
Production, transportation, and material moving occupations	3,678	8.8%
Total	42,024	100%
Industry		
Agriculture, forestry, fishing and hunting, and mining	643	1.5%
Construction	2,593	6.2%
Manufacturing	2,662	6.3%
Wholesale trade	1,575	3.7%
Retail trade	4,638	11.0%
Transportation and warehousing, and utilities	1,978	4.7%
Information	919	2.2%
Finance and insurance, and real estate and rental and leasing	2,422	5.8%
Professional, scientific, and management, and administrative and waste management services	3,875	9.2%
Educational services, and health care and social assistance	11,721	27.9%
Arts, entertainment, and recreation, and accommodation and food services	3,428	8.2%
Other services, except public administration	2,107	5.0%
Public administration	3,463	8.2%
Total	42,024	100%

Source: 2008–2012 American Community Survey (U.S. Census 2012).

Note: Employment figures count civilian employees only. Existing employment identified in Chapter 4 of this DEIR is based on employment generation calculated from nonresidential building square footage by land use type.

Jobs-Housing Ratio

The jobs-housing ratio is a general measure of the total number of jobs and housing units in a defined geographic area, without regard to economic constraints or individual preferences. The balance of jobs and housing in an area, in terms of the total number of jobs and housing units as well as the type of jobs versus the price of housing, has implications for mobility, air quality, and the distribution of tax revenues. The jobs-housing ratio is one indicator of a project's effect on growth and quality of life in the project area. No ideal jobs-housing ratio is adopted in state, regional, or city policies. However, the DOF provides a quantitative definition by estimating that a healthy jobs-housing balance is one new home built for every 1.5 jobs created (Little Hoover Commission 2013).

Jobs-housing balance in the City of Clovis and Fresno County, calculated from US Census, DOF, and Fresno COG data, is shown in Table 5.13-7. The 2013 statistical data for Clovis covers the entire Plan Area, not just inside the City limits; this is done to equally compare the physical 2013 Plan Area to the 2035 Plan Area. As shown, the 2013 Plan Area is housing-rich, with a jobs-housing ratio of 0.74. In comparison, Fresno County is more jobs-rich, with a jobs-housing ratio of 1.32. However, the county is still considered housing rich because its

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ratio is less than 1.50. Projections for 2035 are provided by Fresno COG and show that both Clovis and Fresno County's jobs-housing ratio are anticipated to decrease from 2013 ratios to 0.60 and 1.06, respectively. Fresno COG's 2035 projection data for Clovis assumes a larger boundary, similar to the proposed Plan Area, than its existing municipal boundary, because future development in the SOI and non-SOI Plan Area would most likely be annexed into the City limits.

Table 5.13-7 Population and Employment Projections for Clovis and Fresno County

	City of Clovis Plan Area		Fresno County	
	2013	2035	2013	2035
Population	115,000	177,200	952,166	1,301,000
Households	40,500	58,400	935,444	380,000
Housing Units	42,000	63,200	320,643	411,000
Employment	31,000	38,000	424,620	433,812
Jobs-Housing Ratio	0.74	0.60	1.32	1.06

Source: DOF 2013b; U.S. Census 2012; Fresno COG 2012, 2013, Sumner 2014.

Notes: Existing employment identified in Chapter 4 of this DEIR is based on employment generation calculated from nonresidential building square footage by land use type.

5.13.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- P-1 Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- P-2 Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- P-3 Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

5.13.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

It is important to note the differences between the proposed project's buildout projections and Fresno COG projections. Buildout of the City under the General Plan Update is not linked to a development timeline and is

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based on a conservative buildout of the parcels in the City as identified in the proposed land use plan.¹ In addition, the proposed project provides policy-level guidance and does not contain specific project proposals. On the other hand, Fresno COG projections are based on annual increments in order to develop regional growth projections for land use and transportation planning over a 25-year horizon. Since buildout of the proposed project is not linked to a time frame, it is not appropriate to make a direct comparison with the population, housing, and employment projections provided by Fresno COG. Based on the historical rate of growth in the City,² the amount of development in the land use plan that the City of Clovis can accommodate is not likely to occur within the next 50 years, let alone within the 25-year planning horizon identified by Fresno COG. The analysis in this chapter utilizes Fresno COG's projections for general comparison purposes.

Impact 5.13-1: Under the 2035 Scenario, buildout of the General Plan Update would result in similar population growth as projected by the Fresno COG; however, Full Buildout of the proposed project would substantially increase population in the Plan Area, by over 150 percent by year 2080, which is also beyond Fresno COG's planning horizon. [Threshold P-1]

Impact Analysis: The population increases in the 2035 scenario and full buildout due to development in accordance with the General Plan Update are shown in Table 5.13-8.

Table 5.13-8 Population Increase Due to General Plan Update Buildout

Population	City Boundary	SOI	Non-SOI Plan Area	Total
Existing (2013)	100,000	6,000	9,000	115,000
2035 Scenario	124,400	36,100	23,600	184,100
Change, 2013–2035 Scenario	24,400	30,100	14,600	69,100
Percent Change, 2013–2035 Scenario	24.4%	501.7%	162.2%	60.1%
Full Buildout	126,800	61,800	105,700	294,300
Change, 2035 Scenario–Full Buildout	2,400	25,700	82,100	110,200
Percent Change, 2035 Scenario–Full Buildout	1.9%	71.2%	347.9%	59.9%
Change, 2013–Full Buildout	26,800	55,800	96,700	179,300
Percent Change, 2013–Full Buildout	26.8%	930.0%	1,074.4%	155.9%

2035 Scenario

Population

As shown in Table 5.13-8, the forecast population in the 2035 scenario would increase by 24.4 percent within the City boundary, 501.7 percent in the City's SOI, and 162.2 percent in the non-SOI Plan Area. The majority of the

¹ Buildout to the maximum levels permitted by the proposed land use is not anticipated. The City has historically experienced development levels that do not achieve the maximum allowable density/intensity on every parcel and are, on average, lower than allowed in the proposed General Plan Update. Consequently, the General Plan Update buildout projections are based on similar development densities/intensities as historical levels of development intensity in the City.

² According to the US Census and California DOF population counts, the City has experienced an average annual growth rate of 2.96 percent since 2000.

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forecast population growth (65 percent) would be outside of the City's existing boundary. In total, the entire Plan Area would experience a population increase of 60.1 percent (69,100 persons) by 2035.

Fresno COG bases Clovis's population projection in part on its growing share of the county's population. According to historical data, Clovis's share of the county's population has steadily increased from 3.35 percent in 1970 to 10.60 percent in 2014. By 2035, Fresno COG projects a 13.62 percent share (Fresno COG 2013). Using this data, Fresno COG's 2035 population projection for the City and its assumed City limits by 2035 is 177,200 persons, which is a 77.2 percent increase from Clovis's existing population (see Table 5.13-7). Similar to the proposed project, Fresno COG's projection assumes a larger jurisdictional boundary than existing because future development in the SOI and portions of the non-SOI Plan Area are anticipated to be annexed into the City of Clovis. The City's 2035 scenario population growth under the proposed project (184,100 persons) would be 3.9 percent greater than the Fresno COG's 2035 projections; however, the difference is minimal, given that the population projections are estimated more than 20 years into the future.

Jobs-Housing Ratio

The buildout projections and jobs-housing ratio due to development in accordance with the General Plan Update are shown below in Table 5.13-9.

Table 5.13-9 Comparison of Fresno COG 2035 and Proposed Project Buildout Projections

	Existing Conditions (2013)	Fresno COG 2035 Projection	2035 Scenario	Full Buildout
Population	115,000	177,200	184,100	294,300
Households ¹	40,500	58,400	63,900	101,800
Housing ²	42,000	63,200	67,200	107,100
Employment ³	31,000	38,000	62,400	106,900
Jobs-Housing Ratio	0.74	0.60	0.93	1.00

Source: Fresno COG 2012, 2013.

Notes: Existing and general plan buildout (2035 Scenario and Full Buildout) employment generation rates (EGFs) are estimated based on employees per building square footage. An EGF quantifies the number of nonresidential building square feet per employee. Each proposed land use has a unique employment generation factor.

Dividing the building square footage of each non-residential land use designation by its associated EGF determines the estimated number of jobs at buildout. The EGFs identified for each proposed nonresidential land use are based in part on typical EGFs for comparable regions cross-referenced against the City's current EGFs as determined using on the City's existing building square footage and longitudinal employer-housing dynamics (block-group level). EGFs were then applied to projected building square footages to calculate projected employment levels.

According to Table 5.13-9, Fresno COG projects that the City's jobs-housing ratio to be 0.60 in 2035, which reflects a more jobs-poor and housing-rich environment compared to the City's existing ratio of 0.74. Under the 2035 scenario, development based on the proposed project's land use designations would result in a jobs-housing ratio of 0.93, which is substantially higher than the City's existing ratio (0.74) and the ratio projected by Fresno COG (0.60). A ratio of 0.93 would bring the City closer to a more equal distribution of employment and housing. Thus, the population growth resulting directly from the proposed General Plan Update would be offset by the level of employment opportunity provided to the City's residents and workers commuting into Clovis.

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Furthermore, Policy 1.5 of the Clovis 2008 Housing Element encourages development that provides the opportunity for local residents to live and work in the same community by balancing jobs and housing opportunities. To further strengthen the jobs-housing balance, Policy 1.2 under the proposed General Plan Update's Economic Development Element also aims to improve the City's job-housing ratio by promoting growth in jobs suited to the skills and education of current and future residents. Thus, jobs-housing impacts under the proposed project would be beneficial to the City.

Full Buildout

Population

From the 2035 scenario to full buildout, the majority of the population growth would occur outside of the City's existing boundaries—a projected increase of 25,700 persons in the City's SOI and 82,100 persons in the non-SOI Plan Area (see Table 5.13-8). The population within the City boundaries would only experience a 1.9 percent growth (2,400 persons) because it is assumed that the City would be almost completely built out by 2035, leaving the SOI and non-SOI Plan Area to absorb future growth past 2035. Overall, the full buildout would contribute a total of 179,300 additional residents to the Plan Area compared to existing conditions.

Full buildout of the project would result in 294,300 persons in the entire Plan Area, which is more than 150 percent of the existing population. As stated above, development in accordance with the proposed land use plan at Full Buildout is not likely to occur within the next 50 years, and Fresno COG population projections do not exceed its 25-year planning horizon. Thus, it is uncertain whether the substantial population induced by the proposed General Plan Update would follow population growth trends forecast by the Fresno COG. Given the lack of comparative population projections, the population anticipated in the SOI and non-SOI Plan Area at Full Buildout of the proposed General Plan Update would be substantial and potentially significant.

Jobs-Housing Ratio

As noted above, full buildout of the proposed General Plan Update is not anticipated to occur in the near future, and it is unknown when full buildout may occur. However, this Draft PEIR is tasked with determining the significance of impacts based on the maximum development potential allowed under the proposed project. Based on this standard, buildout of the proposed project would result in significant population growth at full buildout, but would also dramatically improve the jobs-housing balance, from the existing ratio (0.74) and anticipated 2035 Scenario ratio (0.93) to 1.00 by full buildout (see Table 5.13-9). A jobs-housing ratio of 1.00 means that all working adults that reside in the City could hypothetically also work in the City. This is a much healthier job-housing ratio than existing conditions and supports Policy 1.5 of the Housing Element and Policy 1.2 of the Economic Development Element in promoting both jobs and housing opportunities to Clovis residents. Therefore, although full buildout of the General Plan Update would occur far in the future and would substantially induce population growth, it would dramatically improve the City's balance of housing and jobs.

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Impact 5.13-2: The proposed General Plan Update would designate approximately 753 acres of existing residential land for nonresidential uses in the Plan Area. However, the proposed project would provide more housing opportunities than currently exist. Therefore, implementation of the proposed project would not displace people and/or housing. [Thresholds P-2 and P-3]

Impact Analysis: The purpose of General Plan Update is to provide orderly growth in the City of Clovis through the distribution, location, balance, and extent of land uses. For the purposes of analyzing two buildout scenarios, this analysis will assume that development in the 2035 scenario would occur primarily in the City and City's SOI area, and post-2035 development would occur primarily in the non-SOI Plan Area.

2035 Scenario

Under the 2035 scenario, the proposed project would change the land use designations of 372.47 acres of existing residential land uses to nonresidential uses (see Table 5.13-10). This includes 256.33 acres within the City's existing boundary and 116.14 acres in the City's SOI.

Table 5.13-10 Existing Residential Land Uses to Be Converted to Nonresidential Land Use Designations

Area	Existing Residential Land Use Type	Acres
City	Single-Family Residential	32.20
	Multifamily Residential	19.21
	Rural Residential	204.91
Subtotal		256.33
SOI	Rural Residential	116.14
Non-SOI Plan Area	Rural Residential	380.76
TOTAL		753.23

Note: Proposed nonresidential land use designations not allowing residential uses include: MU-BC (Mixed Use/Business Center), O (Office), I (Industrial), C (Commercial), OS (Open Space), P (Public/Quasi-Public Facilities), PK (Park), S (School), W (Water), and Fresno County General Plan Land Use C-SP (Commercial-Specialized).

However, the proposed General Plan Update guides planning for new growth in the City, in part through designation of land uses that result in additional housing. The proposed land use map identifies land use designations for a variety of housing types and provides for additional residential opportunities in areas that currently do not allow residential uses. Examples of new opportunities for additional housing in the City and its SOI include the proposed mixed-use urban centers and villages in Loma Vista and the Northwest and Northeast Urban Centers, where substantial low to high density residential uses would be allowed. Thus, changes in land use designations under the proposed General Plan Update's 2035 scenario would not displace housing and/or residents.

In addition, the 2008 Housing Element includes goals, policies, and actions that ensure that a broad range of housing opportunities are offered in Clovis. These include policies aimed at diversifying housing types that satisfy the physical, social, and economic needs of Clovis residents (Policies 1.1 through 1.4 and 2.3) and are intended to encourage additional housing on vacant land in existing neighborhoods (Policy 4.3).

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Furthermore, pursuant to Assembly Bill X1 26,³ passed in 2011, local governments in California cannot seize private property through eminent domain for private development or economic development projects. Local governments can only seize private property through eminent domain for public works projects. Therefore, though the proposed project would change land use designations on land already developed as residential use to nonresidential land uses, the City would not be able to compel private landowners to sell their property for redevelopment to the new land use designations under the General Plan Update.

Full Buildout

Full buildout of the General Plan Update would change 380.76 acres of existing residential land use in the non-SOI Plan Area to nonresidential land use designations. However, similar to the 2035 scenario, the proposed land use map for the non-SOI Plan Area identifies land use designations for a variety of housing types and provides for additional residential opportunities in areas that currently do not allow residential uses. New residential opportunities include the extensions of the three urban centers past the City's SOI boundary and additional rural residential in the non-SOI Plan Area. Further, as stated above, policies in the housing element and proposed economic development element also promote a healthy balance of housing types for a variety of users.

5.13.4 Relevant General Plan Policies and Development Code Sections

The following are relevant policies of the existing Housing Element and proposed Clovis General Plan and Development Code Update that would reduce potential population and housing impacts of future development in the Plan Area.

General Plan

2008 Housing Element (H)

Goal 1: A diversity of housing opportunities that satisfy the physical, social, and economic needs of existing and future residents of Clovis.

- **Policy 1.1** - Maintain a sufficient inventory of developable land at varying densities to accommodate the existing and projected needed housing supplies.
- **Policy 1.2** - Support mixed-use projects that promote and enhance the adopted goals and policies of the Clovis General Plan.
- **Policy 1.3** - Encourage and participate in efforts designed to achieve economies and efficiencies that will facilitate the production of quality, affordable housing.
- **Policy 1.4** - Promote balanced, orderly growth to minimize unnecessary development costs adding to the cost of housing.

³ Chapter 5 of “Statutes of First Extraordinary Session of 2011”; upheld by California Supreme Court in December 2011 (135 Cal. Rptr. 3d 683).

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Goal 2: Balance growth between housing production, employment, and provision of services.

- **Policy 2.3** - Encourage a diversity of housing types in mixed-use areas, village centers, and other areas in the City to support the Clovis community values.

Goal 4: To maintain and improve the quality of the existing housing stock and the neighborhoods in which it is located.

- **Policy 4.3** - Encourage development of sound new housing on vacant land within existing neighborhoods that have the necessary service infrastructure.

Economic Development Element (ED)

Goal 1: Regionally and globally competitive office and industrial employment centers that deliver desirable career opportunities for residents, create wealth-building opportunities for entrepreneurs, and attract private investment.

- **Policy 1.2 Jobs-housing ratio** - Improve the City's job-housing ratio by promoting growth in jobs suited to the skills and education of current and future residents with the objective of the number of jobs in Clovis being equal to the number of employed residents.

5.13.5 Existing Regulations

- California Housing Element Law: Government Code Section 65300

5.13.6 Level of Significance Before Mitigation

2035 Scenario

Upon implementation of regulatory requirements, the following impacts would be less than significant for the 2035 Scenario: 5.13-1 and 5.13-2.

Full Buildout

Upon implementation of regulatory requirements, the following impacts would be less than significant for Full Buildout: 5.13-2.

Without mitigation, the following impact would be significant for Full Buildout:

- **Impact 5.13-1** Under the 2035 Scenario, buildout of the General Plan Update would result in similar population growth as projected by the Fresno COG; however, full buildout of the proposed project would substantially increase population in the Plan Area, by over 150 percent by year 2080, which is also beyond Fresno COG's planning horizon.

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5.13.7 Mitigation Measures

Impact 5.13-1

2035 Scenario

Impacts are less than significant and mitigation measures are not required for the 2035 Scenario.

Full Buildout

Full buildout of the proposed project would result in up to 294,300 people compared to the existing 115,000 person population in the Plan Area. This substantial, 156 percent increase in population would occur both directly through proposed residential, commercial, and office uses under the proposed land use plan, and indirectly through planned extensions and improvements of roads and infrastructure into the SOI and non-SOI Plan Area. Furthermore, because the Fresno COG population projections do not exceed its 25-year planning horizon, it is uncertain whether the City of Clovis' population growth beyond 2035 would keep pace with the proposed project's population growth. No feasible mitigation measures are available to mitigate the population growth for full General Plan Update buildout.

5.13.8 Level of Significance After Mitigation

2035 Scenario

Impacts would be less than significant for the 2035 Scenario.

Full Buildout.

Impacts would be significant and unavoidable for Full Buildout.

5.13.9 References

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