



CITY OF CLOVIS

# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

FOR SUBMISSION TO THE CITIZENS OF CLOVIS  
AND  
THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
NOVEMBER 2019

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## EXECUTIVE SUMMARY

As a recipient of funds from the U.S. Department of Housing and Urban Development (HUD), the City of Clovis is required to conduct an Analysis of Impediments to Fair Housing Choice (AI) and to review the analysis and update as necessary on a periodic basis. This document includes an analysis of local factors that may impact fair housing choice, the identification of specific impediments to fair housing choice, and action steps to address the identified impediments.

As the City of Clovis grows in population the importance of accessible fair housing, education, services, policies and other resources is increasing in the community. The City has a diverse population in regards to both socioeconomic and demographic populations. The City of Clovis is dedicated to meeting the needs of its current and future residents by creating an environment of fair and equal treatment to all persons within the housing field.

### What is an Impediment to Fair Housing Choice?

As defined in the Fair Housing Planning Guide published by HUD in 1996 impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor.

To affirmatively further fair housing, a community must work to remove impediments to fair housing choice.

### Impediments Identified

This analysis has identified the following impediments to fair housing choice, and supplies the following actions to address the impediments. The section entitled “Findings and Actions” of this document includes additional details of the analysis.

#### **1. IMPEDIMENT: Lack of Sufficient Affordable Housing Supply**

**1.1 Action:** Provide assistance to preserve existing affordable housing and to create new affordable housing.

**1.2 Action:** Assure the availability of adequate sites for the development of affordable housing.

**1.3 Action:** Develop strategies to mitigate or preserve affordable multi-family units at risk of conversion to market rate units.

#### **2. IMPEDIMENT: Insufficient Funding for Affordable Housing Programs**

**2.1 Action:** Research and apply and partner for alternative private and public funding opportunities that can provide additional support to the City’s affordable housing programs and/or developer projects.

## **Fair Housing Education and Enforcement**

Promoting fair housing includes both education and enforcement. The City will continue to support both education and enforcement efforts.

This analysis reported very few complaints to enforcement agencies. This indicates the need for ongoing education to continue the trend of minimal complaints.

### **3. IMPEDIMENT: Lack of knowledge of fair housing rights**

**3.1 Action:** Support efforts to educate persons, including occupants, owners, and agents of both rental and purchase units regarding their fair housing rights and responsibilities.

**3.2 Action:** Support local advocate agencies and community stakeholders in efforts to disseminate fair housing information to the community at large.

### **4. IMPEDIMENT: Lack of information on the nature and basis of housing discrimination**

**4.1 Action:** Monitor the incidence of housing discrimination complaints.

**4.2 Action:** If deemed necessary, create an action item in the City's Annual Action Plan that addresses the trend of discrimination complaints.

## **Governmental Barriers**

Local government can play a significant role in the provision of a full range of housing types and to assuring availability of housing suitable to all sectors of the public. The City offers a wide variety of affordable housing programs and implements land use policies that encourage equitable choice for all persons in Clovis. A key part of housing choice is transportation and due to the City's current density and financial condition, the public transit system is not as robust as the City wishes. The City also needs to work with other governmental agencies to seek funding for rental subsidies and housing projects that reduce housing costs for low-income families.

### **5. IMPEDIMENT: Lack of sufficient public transportation for low-income and special needs populations**

**5.1 Action:** The City will continue to recommend improvements as funds allow to better serve all populations, including low-income and special needs households.

### **6. IMPEDIMENT: Shortage of rental subsidy vouchers**

**6.1 Action:** The City will continue to partner with the Fresno County Housing Authority on both affordable housing projects and obtaining additional funds to support the Housing Choice Voucher Program that is currently oversubscribed and develop additional units.

## INTRODUCTION

The City of Clovis is situated in the core of California's agriculturally rich San Joaquin Valley. It is one of 15 cities located in Fresno County. The City was incorporated in 1912 and has experienced robust growth since 1980. Between 1990 and 2018 the population has risen from approximately 42,000 to 117,003 people. Clovis has enjoyed being known for its "Clovis Way of Life" including high quality schools, well maintained public spaces, and environment where all persons have an opportunity to succeed. This growth has been diverse on all levels and illustrates the need to ensure barriers to fair housing choice are addressed.

### What is Fair Housing Choice?

Equal access to housing is fundamental to each person being able to meet essential needs and to pursuing personal, educational, employment, or other goals. In recognition of equal housing access as a fundamental right, the United States and State of California governments have both established fair housing as a right protected by law.

Federal fair housing laws prohibit discrimination in the sale, rental, lease, or negotiation for real property based on race, color, religion, sex, national origin, familial status, and disability. The California fair housing laws are built upon the federal laws and add marital status, ancestry, source of income, sexual orientation, and any arbitrary factor as protected categories under the laws.

Factors, as defined by HUD that impede equal access to housing or fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor.

To affirmatively promote equal housing opportunities, Clovis must work to remove barriers to fair housing choice. The City of Clovis is dedicated to providing fair housing opportunities to all residents and to ensure all applicable laws are complied with.

### What is an Analysis of Impediments to Fair Housing Choice?

This Analysis of Impediments to Fair Housing Choice adheres to the recommended guidelines issued by HUD found in the Fair Housing Planning Guide. In order to meet these guidelines, the analysis must assess how laws, governmental policies, real estate practices, and local issues affect the availability, accessibility and location of housing. The analysis of these factors may reveal where corrections can be made thus expanding the availability of housing to persons protected under fair housing law. Per the HUD recommendation, this analysis utilizes this definition of a barrier or impediment to fair housing choice:

- Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or

- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor.

#### Goals of the Analysis of Impediments to Fair Housing Choice

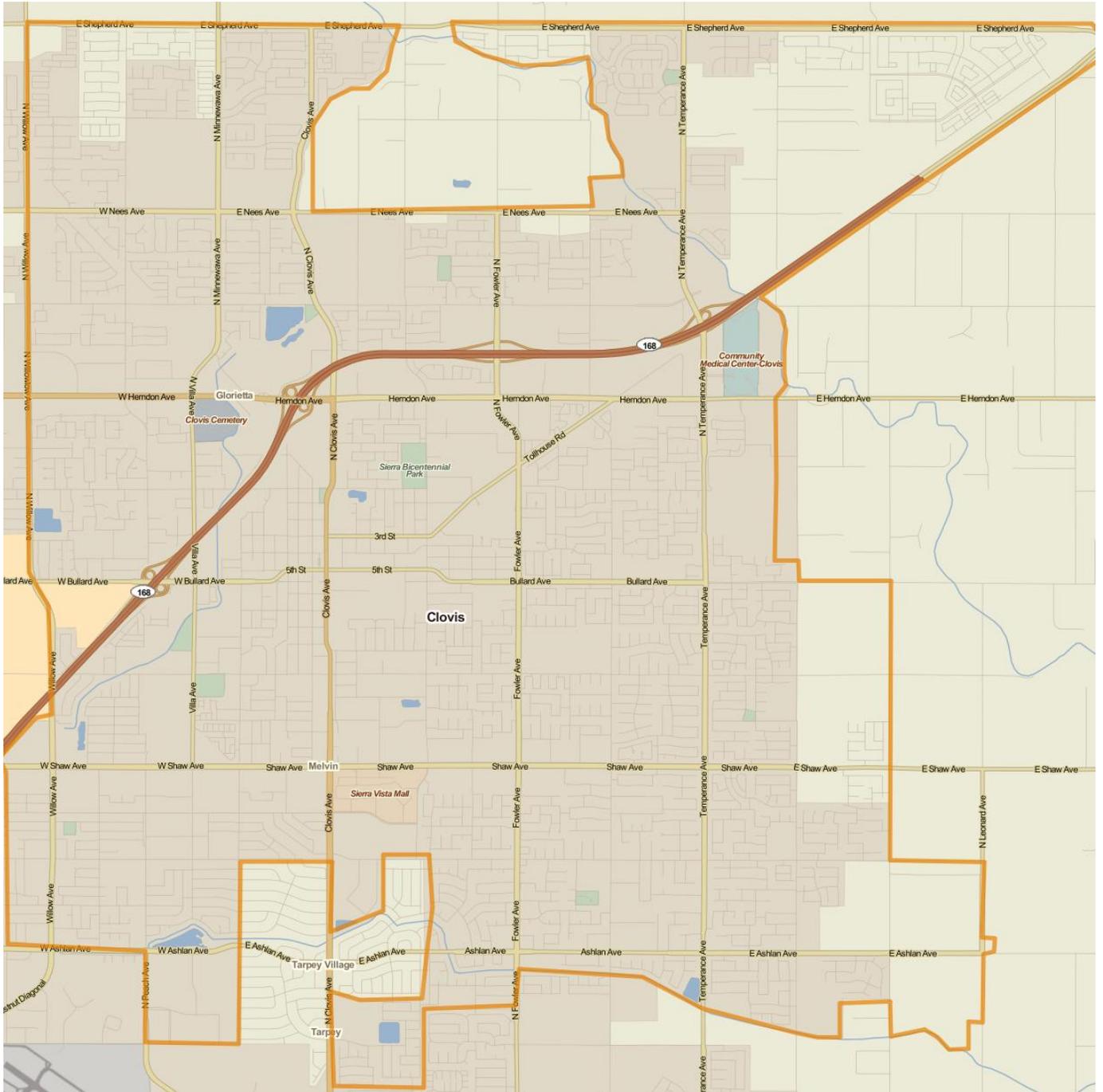
- To provide an overview of the current status of fair housing choice in the City of Clovis.
- Review policies of the City and how they impact fair housing choice, focusing on affordable housing and special needs households.
- Identify impediments to fair housing choice and determine actions the City will undertake to address the impediments.

# COMMUNITY PROFILE

## Demographics Introduction

The City of Clovis has experienced significant changes to the composition of its population over the past twenty years. Knowing and understanding these changes is imperative to creating policies and programs that will meet the City's need for fair housing choice. The following is a detailed look at how much the City has changed and the present demographics of the City's residents.

MAP 1: CLOVIS CITY LIMITS



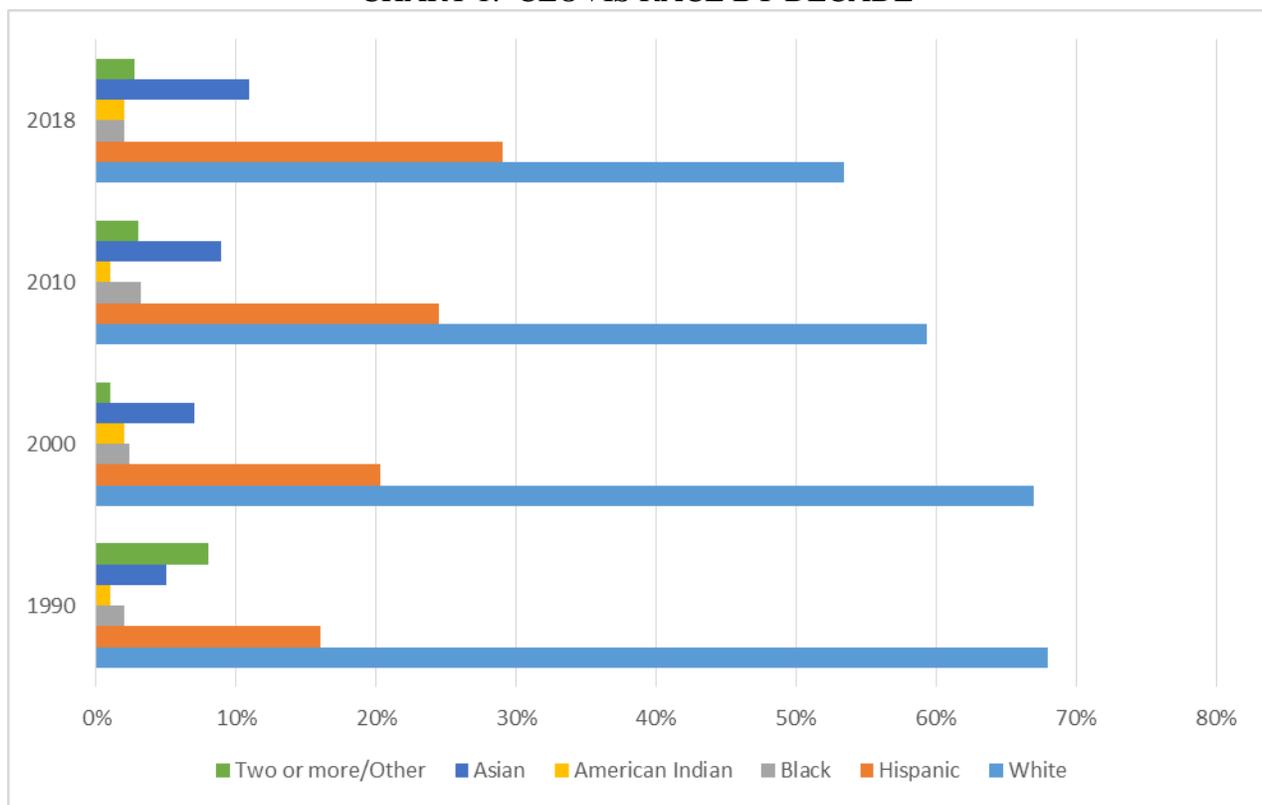
## Population Growth

The City of Clovis is one of 15 cities located in Fresno County and is one of the fastest growing cities in the State of California. The City has experienced a notable increase in population over the last thirty years. The City's 2018 population is 117,003; this was an approximate 134 percent increase from a population of 50,000 in 1990 (Department of Finance). The City's population is anticipated to grow to 133,800 by the year 2030 (Clovis General Plan).

## Race and Ethnicity

Over the past 25 years changes have occurred in the City's racial makeup. As indicated in the charts below the percentage of white residents has been decreasing while the percentage of minorities has been increasing. From 1990 to 2018, all minority races have increased in numbers and several races have been increasing in overall percentages of the population with white alone decreasing; most notably the percentage of Asian residents has increased from 5% to 11% of the population. The changing demographics present new opportunities and challenges for the City as it addresses the needs of its citizens for adequate housing, infrastructure and services as unique needs are represented by each race category.

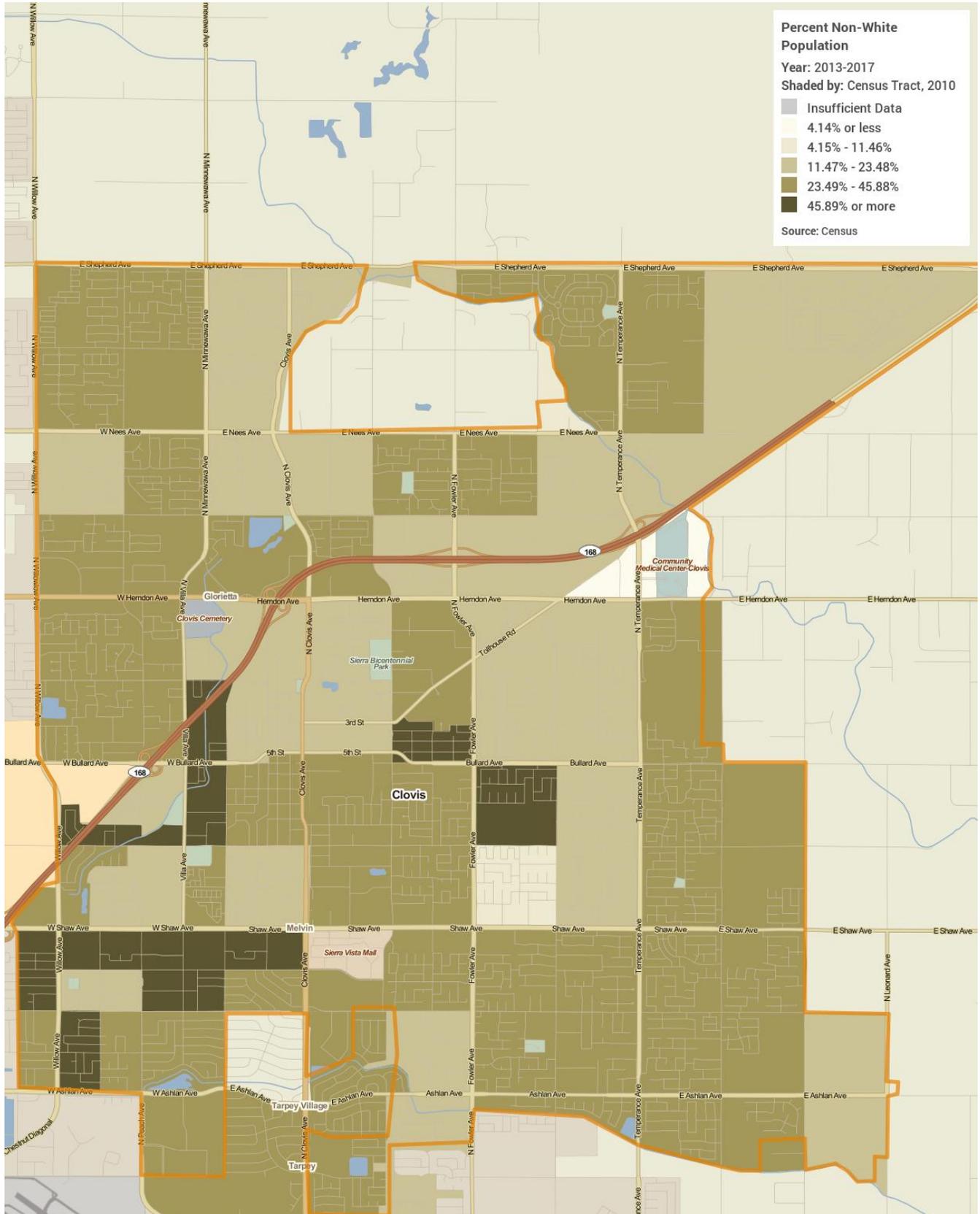
CHART 1: CLOVIS RACE BY DECADE



Source: U.S. Census Bureau, Census & American Communities Surveys

The geographical location of minorities that live in Clovis is depicted in Map 2. In general, minority concentrations are spread evenly throughout the City.

## MAP 2: CITY OF CLOVIS MINORITY CONCENTRATION



**Education**

Only 8.5% of Clovis residents age 25 or older have less than a high school education or equivalency and nearly 33% have a bachelor's degree. This is a huge asset for the City of Clovis and is used to increase economic opportunities for the City's residents. Continuing and expanding upon the current educational opportunities is crucial to increasing opportunities for low-income families to improve their economic situations.

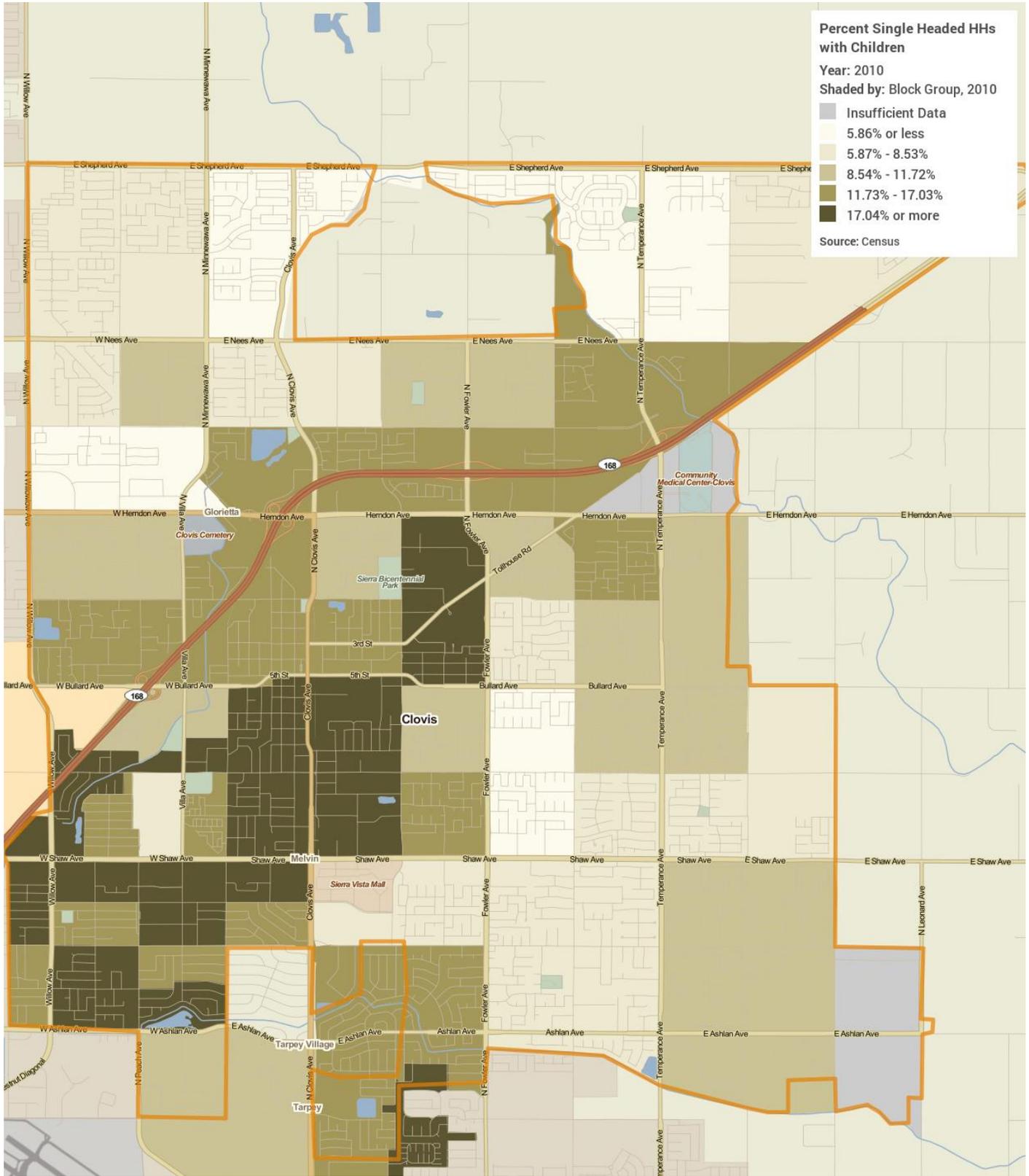
**Immigration**

Using 2017 American Communities Survey, 12,458 of the City's residents are classified by the census as "foreign-born", which is 12% of the total population, a 4% increase from the 2000 census. Many of these persons are from Asia and Latin America. 14.3% of this population, compared to 9.5% of native born residents, are determined to be living in poverty and face considerable challenges in meeting their basic needs. Understanding the needs of these populations is important to developing programs that will allow them to become successful citizens. Communicating in additional native languages may become necessary in implementing programs that are available to low-income families.

**Single Parent Households**

Of the total number of households (35,538), 4,335 are single, male or female headed households with children, which is 12% of the household population according to the 2017 American Communities Survey. As shown in Map 3, many of the census tracts with higher than average single-parent households are located in the southwest and central portions of Clovis.

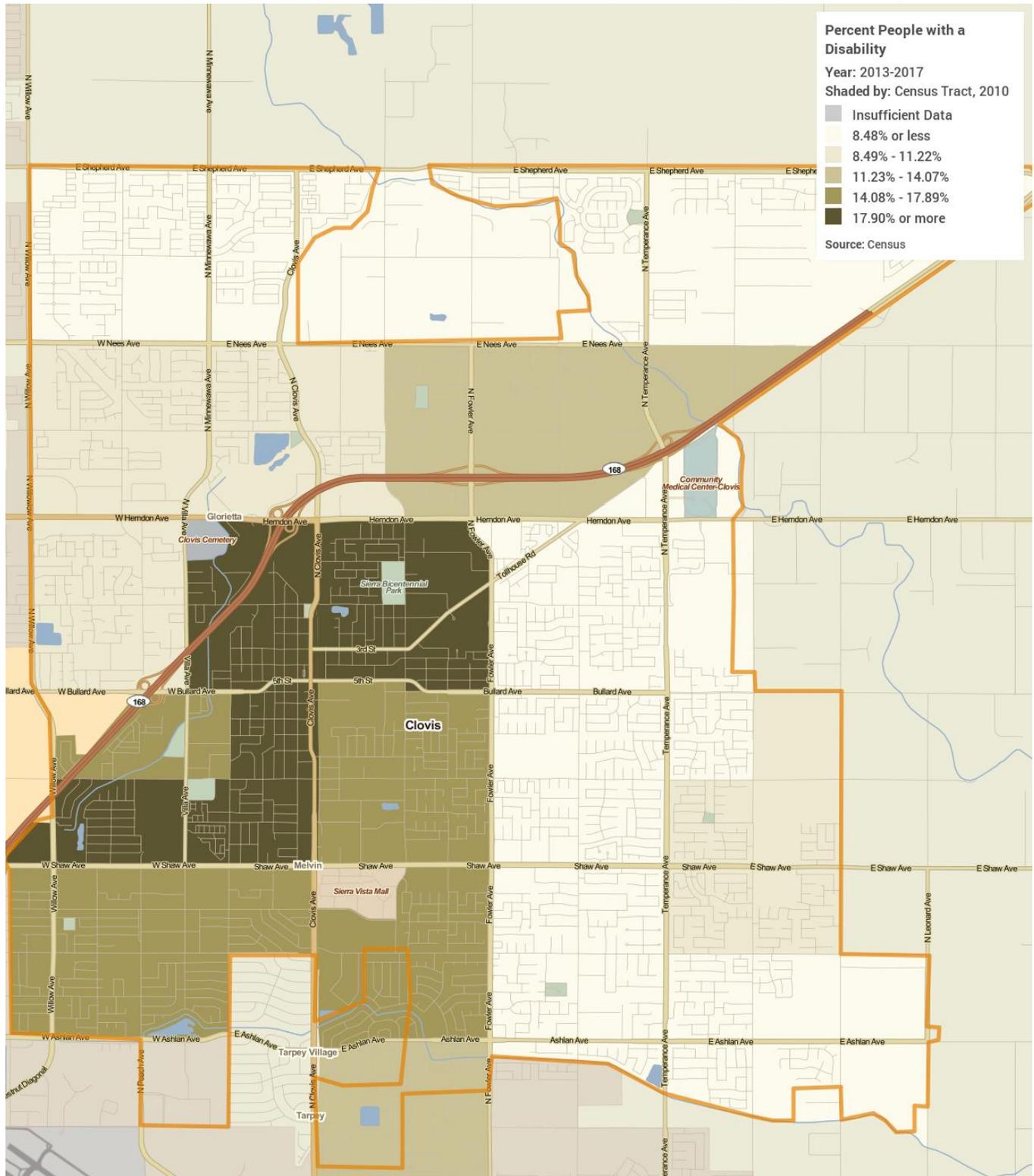
### MAP 3: CITY OF CLOVIS SINGLE PARENT HOUSEHOLD CONCENTRATION



## Persons with Disabilities

According to the 2017 American Community Survey, 12,305 residents of Clovis have some type of disability and 17%, are living in poverty. When compared to the overall poverty rate of 12.7% in the City, it is apparent this group faces challenges in meeting their basic needs. Map 4 demonstrates that in the southwest and central portions of Clovis, there are concentrations of persons with disabilities.

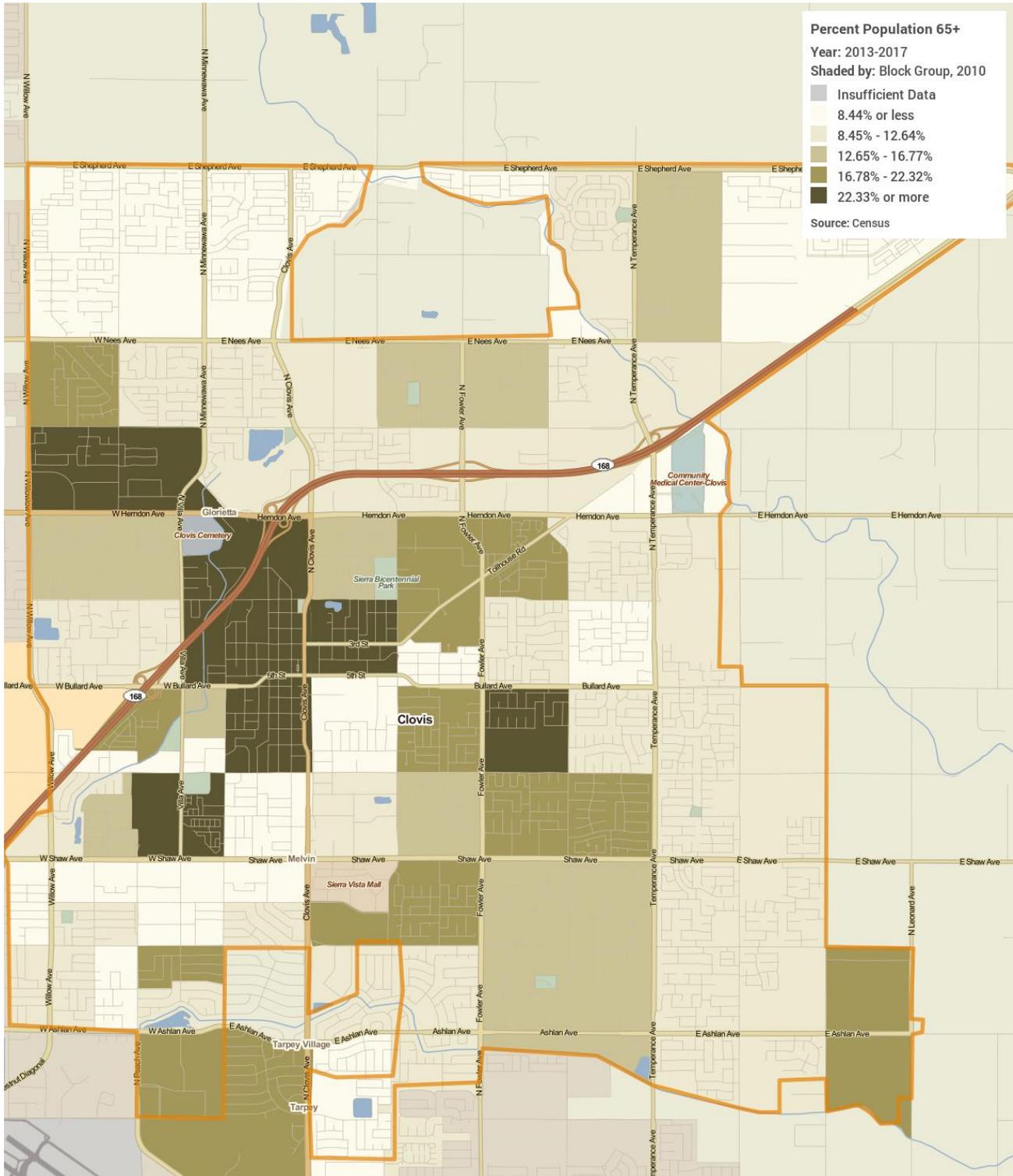
MAP 4: CITY OF CLOVIS PERSONS WITH A DISABILITY CONCENTRATION



## Age Composition

The current median age in Clovis is 34.4, a two-year increase since 2008. The current median age for the United States is 37.8. Map 5 indicates the concentration of individuals 65 and older in the City of Clovis. The highest concentration of senior citizens reside in the western portion of Clovis. As the age composition continues to shift to an older clientele in the City, programs must be analyzed to meet the changing needs of an aging population.

MAP 5: CITY OF CLOVIS ELDERLY PERSONS CONCENTRATION



**Number of Households**

The number of households in Clovis is estimated to have increased from 32,967 to 37,217 from 2008 to 2017 according to the 2017 American Communities survey, a 12.8 percent change between 2008 and 2017. Clovis has shown its ability to accommodate new housing units and the desire for households to move to Clovis. In 2018 the California State Department of Finance figures indicated Clovis was the second fastest growing City in the State with populations over 100,000.

**Household Income**

Household incomes increased significantly over the last ten years. Based on the U.S. Census in 1990, the median household income was \$36,981; in 2000 it was \$42,283; in 2010 it was \$63,229. Currently, the median household income is estimated to be \$68,682 in the 2017 American Communities Survey.

Map 6 indicates median income, showing a higher concentration of wealth in the City's newer areas and a concentration of low median incomes in the City's southwest, west, and central neighborhoods.

# MAP 6: CITY OF CLOVIS MEDIAN INCOME CONCENTRATION

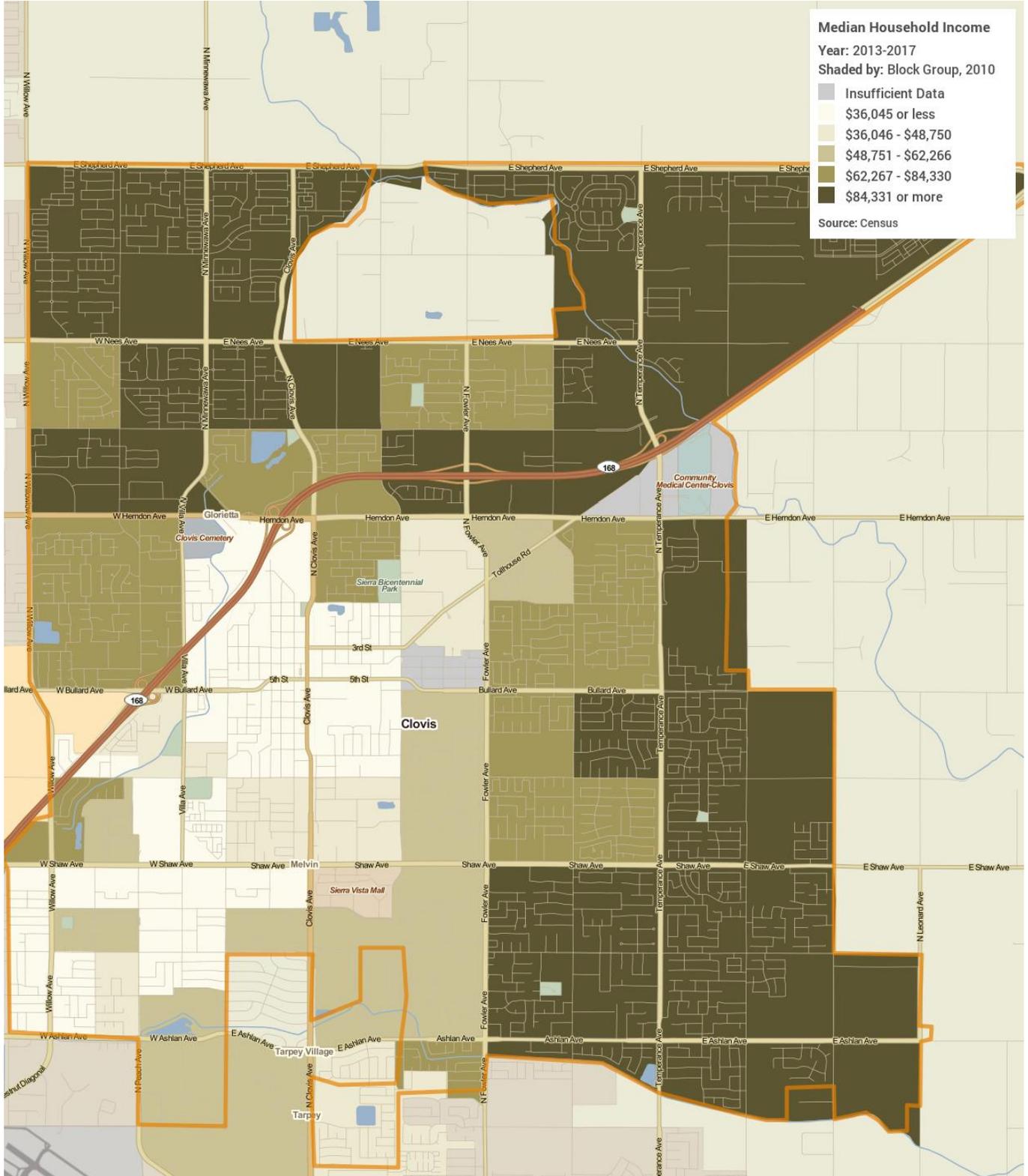


Table 1 shows median household incomes by race. The data shows disparities between races and ethnicities.

TABLE 1: CLOVIS HOUSEHOLD MEDIAN INCOME BY RACE

Race/Ethnicity	Median Income
Asian	80,898
Two or More Races	74,250
White	71,731
Native Hawaiian/Pacific Islander	62,802
Hispanic/Latino	57,038
African American	55,031
American Indian	55,000
Some Other Race	41,277

Source: American Communities Survey 2017

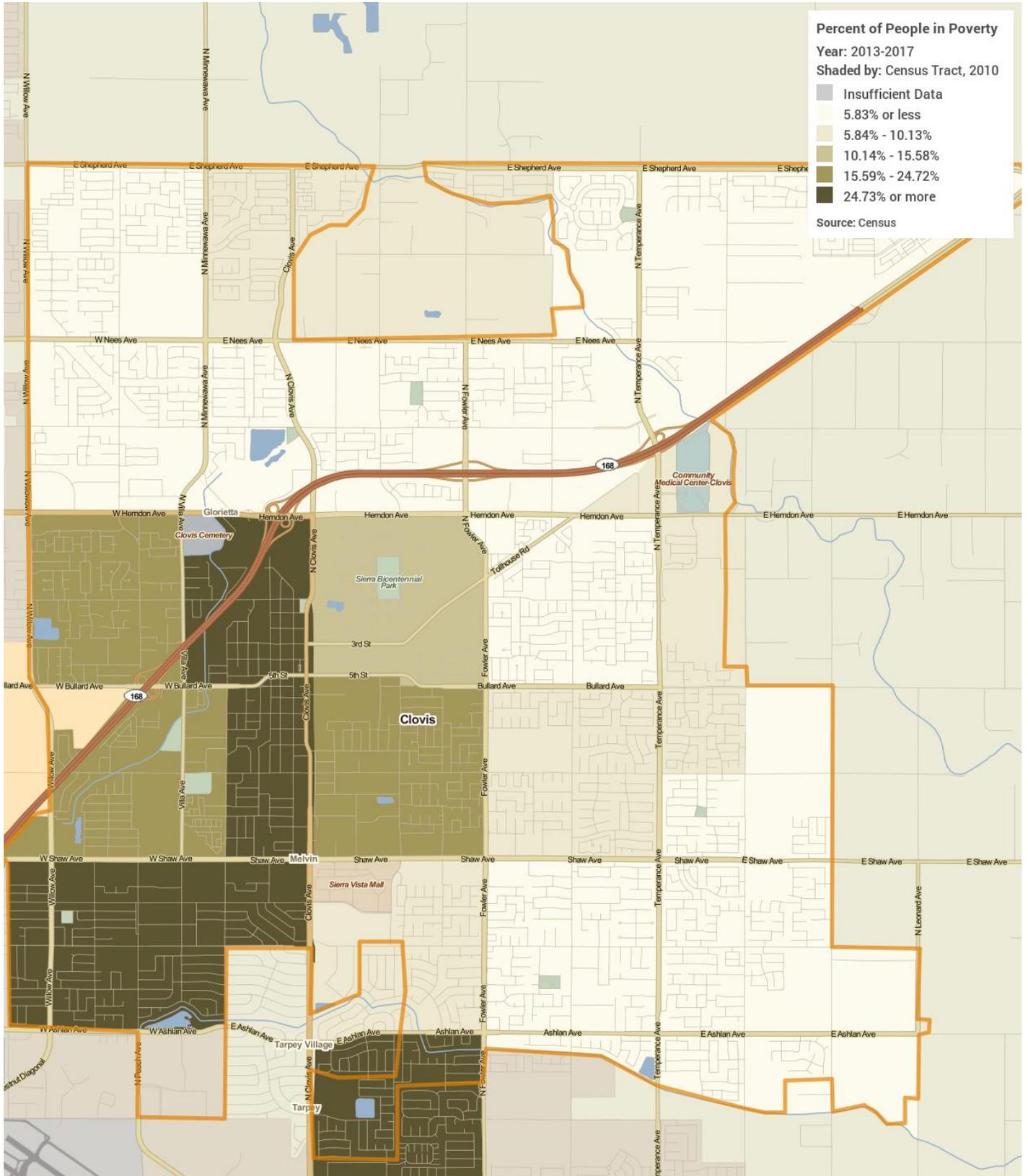
Although the City income levels have increased, Map 7 shows that in some areas over 24 percent of residents live below the poverty level whereas the City’s poverty rate as a whole is 12.7 percent. Map 7 indicates there are much higher incidences of poverty in the City’s central and southwest areas. Providing programs and policies that enable lower income residents to obtain the resources necessary to improve their family’s financial position is clearly needed to improve the quality of life for all Clovis residents.

TABLE 2: INCOME DISTRIBUTION IN CLOVIS

Income <sub>1</sub>	% of Total Population <sub>2</sub>	Households
Very Low	16%	5,615
Low	14 %	4,830
Moderate	9%	2,960
Above Moderate	61%	21,105
<b>TOTAL HOUSEHOLDS<sub>3</sub></b>	<b>100%</b>	<b>34,510</b>

2017 CHAS Data as provided by HUD

# MAP 7: CITY OF CLOVIS POVERTY RATE



## Employment Rates and Employment Centers

The City enjoys having lower unemployment rates than the region and the State of California as a whole. Table 3 shows unemployment rates for the City over the past nine years. These rates have been trending down during the economic recovery.

**TABLE 3: CLOVIS UNEMPLOYMENT RATE**

Year	Rate
2010	9.1
2011	10.7
2012	11
2013	11.4
2014	11.7
2015	10
2016	8.3
2017	7
2018	3.4*

U.S. Census 2010-2017

\*California Employment Development Department, April 2019

There are many scattered employment centers throughout Clovis and the surrounding region. In the 2017 American Communities Survey, it was reported that the average Clovis resident commutes 21 minutes each way and only 148 persons out of 46,962 took public transportation to work on a regular basis. Of the persons who took public transportation, the commute times were on average at least 30 minutes and surpassed one hour for a majority. This indicates a regional public transit system that may not allow persons without the means to own and/or operate a vehicle to access employment centers as easily as the general population. Major employers in Clovis are indicated in Table 4.

**TABLE 4: MAJOR CLOVIS EMPLOYERS**

Company	Employees
Clovis Unified School Dist.	7,469
Clovis Community Hospital	1,923
Walmart	715
City of Clovis	674
Wawona Frozen Foods	537
Alorica	501
Target	343
Anlin Industries	324
Costco	311
Lowe's	215

Source: City of Clovis 2019-20 Annual Budget

## Housing Profile

Data from the U.S. Bureau of Census indicates that the housing stock in the City of Clovis increased by 1,911 units between 2010 and 2018. This change represents a 5.4 percent increase. The data summarized in Table 5 indicates that the growth of the housing inventory in the City slowed during the 2010's likely due to the great recession. Housing starts have increased dramatically during the past two years and are likely not represented in the American Communities Survey data provided.

There are three basic types of housing units for which data is presented: single-family detached units (including planned unit developments), multiple-family units ranging from duplexes to large apartment developments, and mobile homes located in mobile home parks and on individual lots.

The predominant type of dwelling unit continues to be the conventional single-family residence in the City. The construction of single family, detached homes has been steadily increasing. Significant increases can also be seen during 2000 and 2006. As indicated in Table 6, growth of single-family units in Clovis occurred in the early 1980's and between 2000 and 2010. Multi-family has just recently been growing again, making up over half of the permits being issued in the City during 2018.

TABLE 6: TOTAL DWELLING UNITS BY TYPE

Dwelling Type	1980		1990		2000		2010		2017	
	Units	% of Total	Units	% of Total	Units	% of Total	Units	% of Total	Units	% of Total
<b>CITY OF CLOVIS</b>										
Single Family	7,267	57.3%	11,341	60.0%	16,802	66.8%	24,001	70.7%	27,250	73.2%
Multi-Family	4,744	37.4%	6,551	34.7%	7,426	29.5%	9,236	27%	9,967	26.8%
Mobile Homes	667	5.3%	898	4.8%	889	3.5%	918	2.7%	759	2%
<b>Total Year Round Dwelling Units</b>	<b>12,678</b>	<b>100%</b>	<b>18,888</b>	<b>100</b>	<b>25,250</b>	<b>100%</b>	<b>34,155</b>	<b>100%</b>	<b>37,217</b>	<b>100%</b>

Source: 1980, 1990, 2000 Census Data and American Community Survey 2010 & 2017

## Household Characteristics

Before current housing problems can be understood and future needs anticipated, housing occupancy characteristics need to be identified in the City of Clovis. The following is an analysis of household size, household growth, tenure, and vacancy trends. By definition, a "household" consists of all the people occupying a dwelling unit, whether or not they are related. A single person living in an apartment is a household, just as a couple with two children is considered a household.

TABLE 7: TOTAL DWELLING UNITS BY TENURE

Tenure	1990	2000	2006	2010	2017
Total Households	18,155	24,347	29,752	31,867	35,538
Owner Occupied	51.0%	60.4%	56.2%	62.3%	60.5%
Renter Occupied	49.0%	39.6%	43.8%	37.7%	39.5%

Source: 1980, 1990, 2000 Census Data and American Community Survey 2010 & 2017

## Households

From 1990 - 2017, the City grew at a higher rate in the number of households than experienced by Fresno County or the State of California, as shown in Table 5. The total number of households in the City of Clovis in 2017 was 37,217.

## Household Size

In the years before 1990, there was a small, but steady decline in the average household size throughout Fresno County, including the City of Clovis. However, this trend reversed slightly in Clovis between 1990 and 2000, with average household size increasing from 2.75 persons to 2.79 persons. It dropped again by 2010 most likely due to the large amount of vacant homes due to the housing crisis. In 2017, the average household size increased to 2.81. Household size is important, as the City uses the average household size to plan for most public improvements and services and to project population.

TABLE 8: HOUSEHOLD SIZE

Households	1990		2000		2010		2017	
		%		%		%		%
<b>CITY OF CLOVIS</b>	<b>18,261</b>		<b>24,347</b>		<b>31,867</b>		<b>35,538</b>	
1 Person	3,924	21.5	5,420	22.2	6,947	21.8	7,543	21.2
2 Person	5,534	30.3	7,038	28.9	10,070	31.6	10,990	30.9
3 Person	6,758	37.0	8,736	35.9	5,321	16.7	6,649	18.7
4+ Person	2,045	11.0	3,153	13.0	10,626	29.9	10,356	29.1
<b>AVERAGE HOUSEHOLD SIZE</b>	<b>2.75</b>		<b>2.79</b>		<b>2.66</b>		<b>2.81</b>	

Source: 1980, 1990, 2000 Census Data and American Community Survey 2010 & 2017

## Housing Tenure

The number of owner-occupied housing units in the City of Clovis increased between 1990 and 2017 from about 51% of the total units to 60.5%. According to the American Communities Survey (2017) renter occupied housing in Clovis is at 39.5%.

## Vacancy Rates

The vacancy rate is a measure of the general availability of housing. It also indicates how well the types of units available meet the current housing market demand. A low vacancy rate suggests that households may have difficulty finding housing within their price range; a high vacancy rate may indicate either the existence of a high number of units undesirable for occupancy, or an oversupply of housing units.

The Bureau of Census reported Clovis' vacancy rate has decreased to 4.5% in 2017 from 6.7% in 2010. This is likely due to the recovery from the housing crisis. Approximately 1,679 housing units were vacant in 2017.

TABLE 9: CITY OF CLOVIS VACANCY RATE

1990	2000	2010	2017
.30%	3.60%	6.7%	4.5%

Source: 1980, 1990, 2000 Census Data and American Community Survey 2010 & 2017

## Existing Housing Needs

The following analysis of current City of Clovis housing conditions presents housing needs and concerns relative to various segments of the population.

Housing in Clovis is a complex issue, consisting of at least three major components: housing affordability, housing quality, and number of housing units. In addition, certain segments of the population have traditionally experienced unusual difficulty in obtaining adequate housing. Unusual difficulties experienced by the elderly, the disabled, female headed households, large families of five or more persons, homeless persons, and farm workers are discussed as special housing needs in this section.

## Housing Affordability

Affordability is defined as the expenditure of no more than 30 percent of the household income for housing costs. A hypothetical family of four persons is used to analyze housing affordability in Clovis. 2006 American Community Survey Census data provides information on the percentage of gross household income spent on housing. Table 11 lists housing costs as a percentage of gross income.

According to the 2017 HUD CHAS data, the majority of households pay less than 30 percent of gross income on housing costs. A significant number of households, however, pay more than the 30 percent or even 50 percent of their gross income on housing. Approximately 17,385 households spent 30 percent or more of household income on housing.

Table 10 shows a disproportionate number of households (9,085) reported overpaying for rental costs. A higher proportion of renters to homeowners pay 30 percent or more of their monthly income for housing in the lower- and moderate-income categories. This reflects the need for affordable rental housing and for purchase housing particularly for very low- and low-income households.

TABLE 10: CITY OF CLOVIS HOUSING AFFORDABILITY BY INCOME GROUP

Income Category	Cost burden > 30%		Cost burden > 50%		Total	
	Number	Percent	Number	Percent	Number	Percent
<b>OWNER HOUSEHOLDS</b>						
<= 30%	720	12%	575	26%	1295	16%
>30% to <=50%	650	11%	425	19%	1075	13%
>50% to <=80%	1120	18%	665	30%	1785	22%
>80% to <=100%	850	14%	195	9%	1045	13%
>100%	2730	45%	370	17%	3100	37%
<b>Sub Total</b>	<b>6070</b>	<b>100%</b>	<b>2230</b>	<b>100%</b>	<b>8300</b>	<b>100%</b>
<b>RENTER HOUSEHOLDS</b>						
<= 30%	1380	22%	1230	44%	2610	29%
>30% to <=50%	1670	26%	990	36%	2660	29%
>50% to <=80%	2030	32%	430	15%	2460	27%
>80% to <=100%	590	9%	75	3%	665	7%
>100%	640	10%	50	2%	690	8%
<b>Sub Total</b>	<b>6310</b>	<b>100%</b>	<b>2775</b>	<b>100%</b>	<b>9085</b>	<b>100%</b>
<b>Total</b>	<b>12380</b>		<b>5005</b>		<b>17385</b>	

2017 HUD CHAS Data

Table 11 identifies the affordable rents and purchase prices by income category. The rents and purchase prices are predicated on maximum affordable payments based on approximately 30 percent of income expended. The maximum purchase price calculations are based on conventional 30 year loan at a 4.5% interest rate with a 5% down payment. Neither rent nor purchase price account for utility costs.

**TABLE 11: CLOVIS AFFORDABLE RENT/PURCHASE PRICE  
BY ANNUAL INCOME**

Type	Annual Income	Affordable Rent or Mortgage Payment <sup>1</sup>	Maximum Affordable Purchase Price <sup>2</sup>
<b>HOUSEHOLD INCOME</b>			
Extremely Low (<=30% AMI)	\$29,850	\$746	\$110,000
Very Low (>30% to <=50% AMI)	\$31,920	\$798	\$121,000
Low (>50% to <=80% AMI)	\$35,820	\$895	\$135,000
Moderate (>80% to <=100% AMI)	\$47,750	\$1,193	\$175,000
Above Moderate (>100%)	\$47,750+	\$1,193+	\$175,000+

1. Based on 30 percent of income.

2. Based on conventional 30 year loan at a 4.5% interest rate with a 5% down payment.

As a measure of affordability in Clovis, the above available expenditures, as shown on Table 11, should be compared with rental and purchase prices in the City. According to the 2017 American Communities Survey, average rents in Clovis are \$1,140 per month.

As reported by the American Community Survey 2017, 39.5 percent of the housing units in Clovis are renter occupied and the residents have experienced overall rent increases. An extremely low-income household with an income of \$29,850 can afford a housing payment/rent of \$746 per month.

As reported by the American Community Survey 2017, the average resale asking home price was \$284,200. According to Zillow.com in June of 2018, the median sale price in Clovis is \$314,600. Based on this information, it is apparent that generally only families with above moderate incomes can afford to buy a house.

Families in the above moderate-, moderate-, and low-income groups can generally afford the rent for an average two-bedroom rental unit. Low-income families may find it difficult to pay for the necessary number of bedrooms adequate for their family size, and very low-income households will find it difficult to find affordable housing within the existing housing stock.

This information indicates that the majority of the households that are in the very low-income category must pay more than 30 percent of their income for housing costs for any single family home or apartment larger than one bedroom. In low-income households, a high percentage of large families and those who want to be owner occupants must pay over 30 percent of their household incomes for housing.

### **Housing Quality**

The condition of the City's housing stock is determined by several factors. Although age does not necessarily precipitate physical deterioration, deferred maintenance in combination with age commonly causes older housing to decline in quality.

The 2007 survey found that 95 percent of the City's housing was in standard condition. Of those units requiring work, 4 percent of the housing structures in Clovis require minor rehabilitation, and approximately 1 percent require moderate to substantial rehabilitation (which may cost more than the value of the dwelling), or are dilapidated to the point of needing demolition. The number of houses in need of substantial rehabilitation or demolition has declined due to in-fill development of underutilized properties and the City's effort over the past 20 years to purchase and tear down or provide loans to replace dilapidated housing. The 2017 American Communities Survey estimated 51 units lacked complete or operable plumbing facilities.

## Overcrowding

The Bureau of Census defines overcrowded housing units as "those in excess of one person per room average". Overcrowding is often reflective of one of three conditions: 1) either a family or household is living in too small a dwelling; 2) a family is required to house extended family members (i.e., grandparents or grown children and their families living with parents, termed doubling); 3) a family is renting inadequate living space to nonfamily members, which also represents doubling. In terms of a number, overcrowded is considered more than 1 person per room. Whatever the cause of overcrowding, there appears to be a direct link to housing affordability. Either homeowners/renters with large families are unable to afford larger dwellings, older children wishing to leave home are prohibited from doing so because they cannot qualify for a home loan or are unable to make rental payments, or grandparents on fixed incomes are unable to afford suitable housing or have physical handicaps that force them to live with their children. Families with low incomes may permit overcrowding to derive additional income, or there may be insufficient supply of housing units in the community to accommodate the demand. Lack of appropriate size housing units, low incomes, and large families encourage severe overcrowding, especially during harvest season when farm workers expand the local labor force and compete for housing accommodations.

TABLE 12: CLOVIS OVERCROWDING

	1980	1990	2000	2010	2017
Total Occupied Housing Units	12,437	18,888	24,240	31,867	35,538
Overcrowded	416	1,033	1,674	1,037	1,407
Incidence of Overcrowding	3.30%	5.50%	6.90%	3.3%	3.9%

<sup>1</sup> Housing Units that exceed 1.0 or more persons per room.

Source: U. S Bureau of Census. 1980, 1990, 2000. American Community Survey 2010 & 2017

Table 12 shows that 3.3 percent of the total housing units within the City of Clovis were overcrowded in 1980, and 5.5 percent of the units were overcrowded in 1990 as reported by the Bureau of Census. According to the American Community Survey of 2017, 3.9 percent of the units were overcrowded.

## Special Needs Populations

The State Housing law requires that the special needs of certain disadvantaged groups be addressed. The needs of the elderly, handicapped, large families, female heads of household, and farm workers are addressed below.

## *Elderly Persons*

The special housing needs of the elderly are an important concern of the City of Clovis since many retired persons are likely to be on fixed low incomes. Besides the affordability concern, the elderly maintain special needs related to housing construction and location. The elderly often require ramps, handrails, lower cupboards and counters, etc., to allow greater access and mobility. They also may need special security devices for their homes to allow greater self-protection. The elderly also have special needs regarding location. They need to have access to public facilities (i.e., medical and shopping) and public transit facilities. Many would rather remain in their homes rather than relocate to a retirement community and may need assistance to make home repairs. Every effort should be made to maintain their dignity, self-respect, and quality of life.

As reported in the 2017 American Communities Survey, 10,107 City residents, or 10.6 percent of the total population, were 65 years of age or older in 2017.

The City has a number of apartment complexes for occupancy by elderly or handicapped households. Following is a list of apartment complexes that are designated for seniors/disabled.

### **Disabled Accessible Rental Housing**

Ashtree Apartments, 3131 Willow Avenue  
Briarwood Apartments, 275 W. Alamos Avenue  
Claremont (seniors only), 2151 Sunnyside Avenue  
Claremont II (seniors only), 2152 Stanford Avenue  
Clovis Village Apartments, 250 W. Bullard Avenue  
Creek Park Village (seniors only), Third and Minnewawa  
Creskside Apartments, 4751 E. Gettysburg Avenue  
Dry Creek Meadows, 740 N. Villa Avenue  
Eastview Apartments, 647 W. Barstow Avenue  
Hotchkiss Terrace, 51 Barstow Avenue  
Magnolia Crossing, 32 W. Sierra Avenue  
Monte Vista Apartments, 3140 Peach Avenue  
Park Creek Apartments, 1108 Villa Avenue  
Park Villa Apartments, 361 W. Santa Ana Avenue  
Peach Wood Apartments, 391 Peach Avenue  
Royal Villa Apartments, 280 W. Alamos Avenue  
Roseview Terrace, 101 Barstow Avenue  
Santa Ana Villa, 2216 #1 Peach Avenue  
Scottsman #2, 55 W. Bullard Avenue  
Shadow Brook Apartments, 111 W. Ninth Street  
Sierra Heartlands (seniors only) 1994 Shaw Avenue  
Sierra Meadows, 139 W. Portals Avenue  
Sierra Ridge Apartments, 100 Fowler Avenue  
Silver Ridge Apartments, 88 N. DeWitt Avenue

Villa Apartments, 505 Villa Avenue  
Villa Sierra, 139 Santa Ana Avenue  
Village Arms, 1253 Pollasky Avenue  
Willow Lake Apartments, 697 W. Santa Ana Avenue  
Willow Ridge Apartments, 2800 Willow Avenue  
Woodbridge Apartments, 1099 Sylmar Avenue  
Woodside Village Apartments, 1050 Minnewawa Avenue

### *Disabled Persons*

Two major housing needs of the disabled are access and affordability. There are many types of physical and mental disabilities. Section 22511.5 of the California Administrative Code for vehicle and building code enforcement defines a disabled person as:

1. Any person who has lost, or has lost the use of, one or more lower extremities or both hands, or who has significant limitation in the use of lower extremities, or who has a diagnosed disease or disorder which substantially impairs or interferes with mobility, or who is so severely disabled as to be unable to move without the aid of an assistant device.
2. Any person who is blind to such an extent that the person's central visual acuity does not exceed 20/200 in the better eye, with corrective lenses, as measured by the Snellen test, or visual acuity that is greater than 20/200, but with a limitation in the field of vision such that the widest diameter of the visual field subtends an angle not greater than 20 degrees.
3. Any person who suffers from lung disease to such an extent that his forced (respiratory) expiratory volume when measured for one second by spirometry is less than one liter or his arterial oxygen tension (pO<sub>2</sub>) is less than 60 mm/Hg on room air at rest.
4. Any person who is impaired by cardiovascular disease to the extent that his functional limitations are classified in severity as Class III or Class IV according to standards accepted by the American Heart Association.

Disabled persons often require specially designed dwellings to permit free access not only within the dwelling, but also to and from the unit. Special modifications to permit free access are very important in maintaining independence and dignity. The California Administrative Code Title 24 Requirements sets forth access and adaptability requirements for the physically handicapped. These regulations apply to public buildings such as motels, and require that ramp ways, larger door widths, restroom modifications, etc., be designed which enable free access to the handicapped. Such standards are not mandatory of new single-family residential construction.

Like the elderly, the disabled also have special needs with regard to location. There is typically a desire to be located near public facilities, and especially near public transportation facilities that provide service to the disabled. Many government programs which group seniors and disabled persons together (such as HUD Section 202 housing) are inadequate and often do not serve the needs of the disabled. A number of disabled persons receive supplemental Social Security Income (SSI) and are on fixed incomes. Increasing inflation and housing costs adversely affect these individuals in terms of securing housing.

The Census Bureau defines disability as a long-lasting sensory, physical, mental, or emotional condition or conditions that make it difficult for a person to do functional or participatory activities such as seeing, hearing, walking, climbing stairs, learning, remembering, concentrating, dressing, bathing, going outside the home, or working at a job. 12,319 persons have a disability in Clovis according to the 2017 American Communities Survey representing 11.9% of the population. 38.8% of persons over 65 are reported to have a disability.

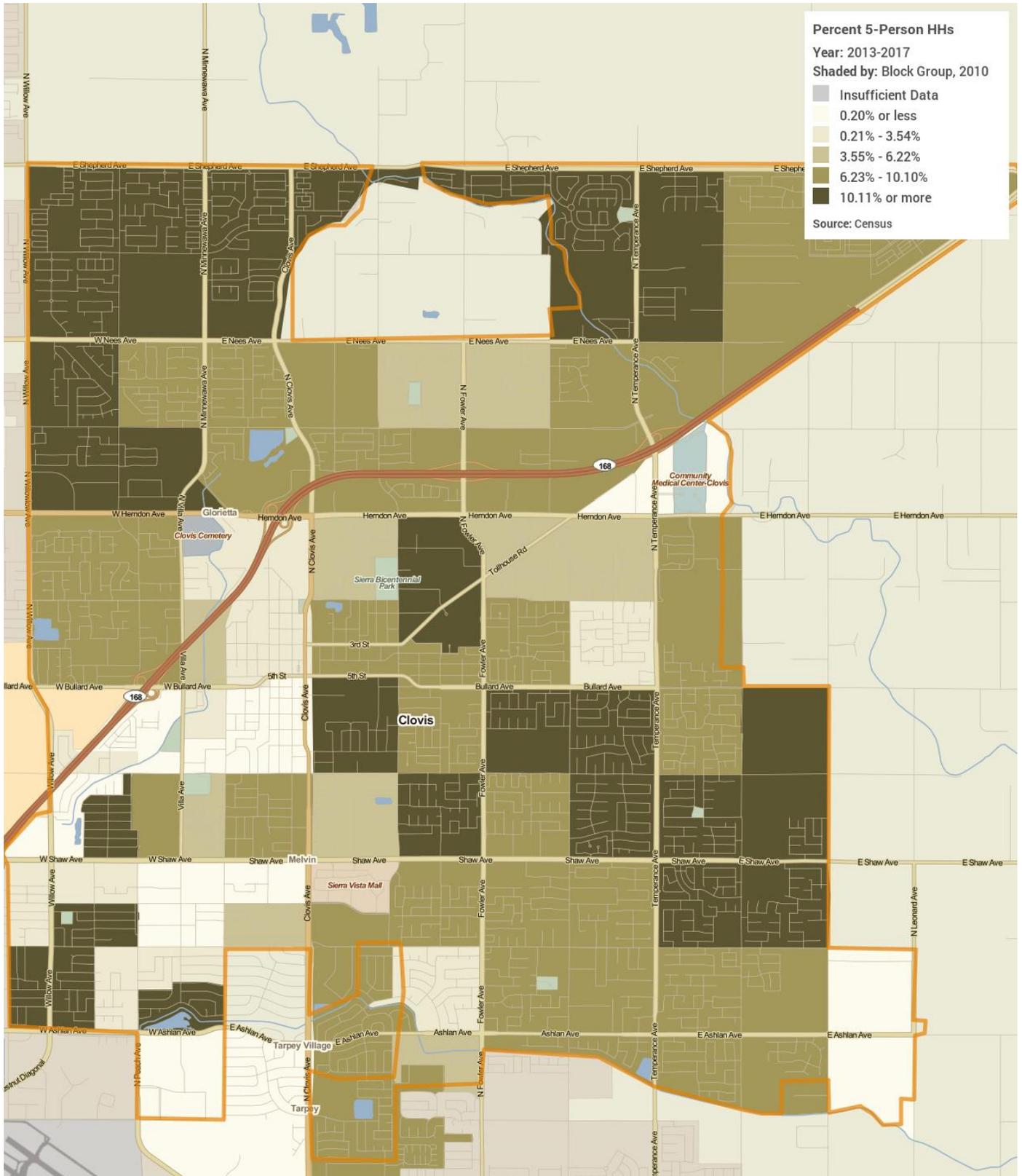
The mobility or self-care limitation does not necessarily translate into a need for specially constructed housing units. Therefore, it is difficult to estimate the number of disabled persons in need of housing. A number of the senior apartment complexes provide handicapped features on their lower level apartment units.

When contacted regarding accessibility issues, City staff will provide for the participation of disabled individuals by supplying assisted listening devices, print enlargers, sign language interpreters, and other necessary accommodations, as well as generally providing for the physical mobility of all participants.

#### *Large Family Households*

Large households are defined as households with four or more persons. Most recent data provided by the U.S. Census Bureau, 2017 American Community Survey reported 10,356 households in the City of Clovis with four or more persons. Large families are indicative of households that require larger dwellings, with more bedrooms to meet their housing needs.

## MAP 8: LARGE FAMILY CONCENTRATIONS



### *Female Heads of Household*

Single female heads of household form a distinguishable group in the Clovis housing market. In 1990, 12.2 percent of all Clovis households consisted of single female heads of household. The 2000 Census shows that females head 3,219 households, which was 13.2 percent of the total households. The American Community Survey of 2017 shows that females head 4,554 households, which represents 13.4 percent of the total households, while single female heads of household constitute a group with serious housing concerns. Families with female heads of household experience a high incidence of poverty.

The Census provides data on the number of female-headed households below the poverty line. Poverty status is the relationship of income to the number of children under 18 for a household. In 2017, the percent of female-headed households in Clovis below the poverty level represented 33.2 percent.

Census data does not analyze the relationship between poverty status and housing tenure. Therefore, it is difficult to estimate the housing needs of low-income female-headed households. The total resources of assisted units in the City are not adequate to serve the number of these households that would potentially require low-income housing. Resources in the community to assist single female heads of household generally include Section 8 Vouchers and other forms of public assistance. This type of assistance is limited by funding and the number of Section 8 vouchers available. Single female heads of household who make slightly more than upper qualifying limits for public assistance in many respects fall through the cracks in the community.

Increases in the numbers of single female heads of household in Clovis can be attributed to several factors. One factor that appears to stand out is the interest in placing children in the Clovis Unified School District. While the school district extends beyond the border of the City of Clovis, a substantial number of the housing opportunities in lower- to moderate-priced rental units lie in the City of Clovis.

### *Farm Workers*

Based on the American Community Survey of 2017, workers in farming or related industries in Clovis are approximately 1.4 percent of all workers. During the seasons when large numbers of migrant and seasonal farm workers and their families are in Fresno County, there is increased pressure on the affordable housing stock. That pressure may take the form of lower vacancy rates, tenants with inadequate facilities (garages or other out buildings), and overcrowding.

The small numbers of farm worker households in Clovis are typically able to find housing within the affordable housing stock. Farm worker households in Clovis can be served through the City's affordable housing projects.

### *Homeless*

Understanding the extent of homelessness in Clovis has been difficult because there are no shelters or other services available. If a person or family finds himself or herself homeless, they must go to facilities in the City of Fresno for assistance. The following is a listing of the homeless facilities in Fresno County:

**TABLE 13: HOMELESS SERVICES IN FRESNO COUNTY**

<b>Type of Shelter</b>	<b>Organization Name</b>	<b>Project Type</b>	<b>Subpopulation</b>	<b>Beds</b>
Emergency Shelter	County of Fresno ETA	Vouchers	Households with children	70
Emergency Shelter	Fresno EOC	Sanctuary Youth Shelter	Youth (under 18)	10
Emergency Shelter	Fresno EOC	Transitional Youth Emergency	Youth (18-24)	16
Emergency Shelter	Marjaree Mason Center	Domestic Violence Shelter	Domestic Violence	89
Emergency Shelter	Marjaree Mason Center	MMC DV CalOES	Domestic Violence	7
Emergency Shelter	Poverello House	Voucher Program	Children or Veterans	4
Emergency Shelter	Poverello House	Naomi's House	Women only	28
Emergency Shelter	Turning Point (TPOCC)	Bridge Point		11
Emergency Shelter	VA Central CA Health	Birdie's Guest Home	Veterans	6
Emergency Shelter	VA Central CA Health	Redux House	Veterans	35
Transitional	Fresno EOC	Bridge to Home 1		17
Transitional	Fresno EOC	Bridge to Home 2		2
Transitional	Marjaree Mason Center	CalOES Family Stabilization	Domestic Violence	15
Transitional	Marjaree Mason Center	Clovis Shelter	Domestic Violence	18
Transitional	Valley Teen Ranch	Transitional Living Home	Youth (18-24)	4
Transitional	West Care	Homefront (Bridge)	Veterans	4
Transitional	West Care	Homefront	Veterans	12
Transitional	West Care	Veteran's Plaza (Bridge)	Veterans	8
Transitional	West Care	Veteran's Plaza	Veterans	20
Rapid Re-Housing	Fresno EOC	Project Home Plate		7
Rapid Re-Housing	Fresno Housing Auth	A Family Home	Households with children	60
Rapid Re-Housing	Fresno Housing Auth	A Rapid Way Home		0
Rapid Re-Housing	Fresno Housing Auth	CalWORKS HSP	Households with children	153
Rapid Re-Housing	Fresno Housing Auth	Rapid Rehousing	Households with children	23
Rapid Re-Housing	Fresno Housing Auth	TBRA		51
Rapid Re-Housing	Marjaree Mason Center	CalOES RRH Next Step	Domestic Violence	30
Rapid Re-Housing	Marjaree Mason Center	Housing First Rapid Rehousing	Domestic Violence	46
Rapid Re-Housing	Marjaree Mason Center	Rapid Re-housing	Domestic Violence	27
Rapid Re-Housing	Marjaree Mason Center	Welcome Home 1	Domestic Violence	11
Rapid Re-Housing	Marjaree Mason Center	Welcome Home 2	Domestic Violence	43
Rapid Re-Housing	Marjaree Mason Center	Welcome Home 2A	Domestic Violence	11
Rapid Re-Housing	Marjaree Mason Center	Welcome Home 3	Domestic Violence	35
Rapid Re-Housing	West Care	ESG Project Unite		3
Rapid Re-Housing	West Care	SSVF	Veterans	26
Rapid Re-Housing	WestCare	County Rapid Rehousing		0
Rapid Re-Housing	WestCare	HDAP		8
Permanent	Fresno EOC	Phoenix		19
Permanent	Fresno EOC	Project Hearth		20
Permanent	Fresno EOC	Project Homestead		21
Permanent	Fresno Housing Auth	Alta Monte		29
Permanent	Fresno Housing Auth	Renaissance at Santa Clara B		24
Permanent	Fresno Housing Auth	S+C IV		58
Permanent	Fresno Housing Auth	Santa Clara		24
Permanent	Fresno Housing Auth	SPC I-III		146
Permanent	Fresno Housing Auth	Trinity Project		20
Permanent	Fresno Housing Auth	VASH Fresno	Veterans	584
Permanent	Mental Health Systems	Fresno Housing Plus III		9
Permanent	Mental Health Systems	Hacienda		11
Permanent	Turning Point (TPOCC)	Falcon Court		46
Permanent	Turning Point (TPOCC)	Family Villa	Households with children	104
Permanent	Turning Point (TPOCC)	Serenity Village		7
Permanent	Turning Point (TPOCC)	STASIS		28
Permanent	West Care	HOPWA		35
Permanent	WestCare	Project Lift Off		45
Permanent	Fresno Housing Auth	Renaissance at Parc Grove	Veterans	44
<b>Total Beds Available in Fresno County</b>				<b>2,184</b>

The City of Clovis is an active member of the Fresno-Madera Continuum of Care (FMCOC) that seeks federal funding for the region. This collaborative group addresses homeless issues including chronic homelessness, homelessness prevention, and discharge coordination policies on a region wide basis that includes the City of Clovis. In a point-in-time survey conducted by City staff in January, 2019, in accordance with HUD requirements with the FMCOC, 27 homeless individuals were located and surveyed in Clovis.

**Projected Single-Family Housing Demand for All Income Levels**

The Council of Fresno County Governments (COG) is required by state law to identify future housing needs through 2033. The Regional Housing Needs Allocation establishes both the projected need for nonmarket rate housing and the "same share" distribution of the projected need to each jurisdiction in each market area. The need for nonmarket rate housing is defined as households in the very low-, low-, and moderate- income groups that pay over 30 percent of the total income for housing. It is assumed that households with an above moderate income are not in need of economic aid.

The RHNA calculates the projected new construction need necessary to accommodate the anticipated population through 2033. The basic construction need was calculated by factoring projected population, vacancy rates, housing market removals, and existing housing units. State housing law requires that cities and counties demonstrate adequate residential sites that could accommodate development of housing that satisfies the future housing need. The future need by income group is shown on the following Table 14. A projected need of 6,328 new housing units is assigned to Clovis in the RHNA, based upon current conditions.

TABLE 14: REGIONAL HOUSING NEEDS ALLOCATION 2013-23

<b>Income Category</b>	<b>Additional Units</b>
Extremely Low	1,160
Very Low	1,161
Low	1,145
Moderate	1,018
Above Moderate	1,844
<b>Total</b>	<b>6,328</b>

## **PRIVATE SECTOR PRACTICES**

This section of the AI analyzes the practices of the private sector as they relate to fair housing choice, including the policies and practices of real estate agents, property managers and lenders.

### **Real Estate Sales Practices**

In the State of California, to engage in the business of real estate sales, a broker or salesperson must be licensed by the Department of Real Estate (DRE). The DRE also enforces violations of California real estate law including violations in the City of Clovis. The real estate industry is very organized with almost all brokers and salespersons being members of real estate associations. The two largest are the California Association of Realtors (CAR), which is a member of the National Association of Realtors (NAR), and the California Association of Real Estate Brokers (CAREB), associated with the National Association of Real Estate Brokers (NAREB).

NAR has a professional code of conduct that prohibits unequal treatment in services or employment practices. Article 10 of the NAR code of ethics states:

“Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex handicap, familial status, or national origin.”

A Realtor pledges to uphold and conduct business in keeping with the code of ethics. The code of ethics is a strong statement in support of equal opportunity in housing. If a Realtor suspects discrimination they are required to report to the local board of realtors (Fresno Association of Realtors) who then has the responsibility to enforce the code of ethics including corrective action. The Fresno Association of Realtors provides trainings through its affiliation with the California Association of Realtors for fair housing requirements and issues. These courses ensure Realtors understand the law and their obligations under it and their status as a Realtor.

NAREB members also follow a strict code of ethics stating that “any NAREB member shall not discriminate against any person because of race, color, religion, sex, national origin, disability, familial status or sexual orientation.” (Part I, Section 2, NAREB Code of Ethics) This applies to the following transactions:

- In the sale or rental of real property
- In advertising the sale or rental of real property
- In financing real property
- In conducting business

In addition Part 1, Section 2 states “a NAREB member shall not be instrumental in establishing, reinforcing, or extending any agreement or provision that restricts or limits the use or occupancy of real property to any person or group of persons on the basis of race, color, religion, sex, national origin, disability, familial status, or sexual orientation.”

### **Rental and Property Management**

The California Apartment Association (CAA) is the country’s largest statewide trade association for rental property owners and managers totaling over 1.5 million members. CAA supports all local, state

and federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or nation origin. Members of the CAA agree to abide by the following provisions in their Code for Equal Housing Opportunity:

- We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis;
- We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our resident's tenancy;
- We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we did not engage in any behavior or action that would result in steering; and
- We agree not to print, display or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.

The CAA offers a Certification in Residential Management (CRM), which includes a course on fair housing law. In addition, local associations offer trainings to further educate professionals in the industry.

### **Advertisements**

In June 2019, a review of rental housing advertisements for the City of Clovis was completed to identify fair housing violations or impediments. All advertisements were examined for language that indicates that housing would not be made available to persons in protected classes. No advertisements were found with indications of illegal or unfair practices being conducted. The review looked at 20% of 2004 listings on Craigslist and Zillow. A total of 450 were reviewed and no fair housing impediments or violations were identified.

### **Use of Restrictive Covenants**

Covenants that restrict the ownership or use of real property based on membership in a protected class are prohibited under state and federal law. However, it has been found recorded documents with these terms can still exist.

In order to eliminate this occurrence, the California Department of Real Estate reviews Covenants, Conditions, and Restrictions for all subdivisions that have five or more units. This process is authorized by the Subdivided Lands Act and mandated by the Business Professions Code, Section 11000. The process includes a review for fair housing law compliance.

### **Mortgage Lending**

Lending practices in the private sector may impact a household's access to housing. A key aspect to fair housing choice is equal access to credit for the purchase or improvement of a home. In order to ensure and enforce equal access, the Community Reinvestment Act was passed in 1997. The following reviews the lending practices of financial institutions and the corresponding access to credit by all households including minority and low-income households.

#### *Conventional vs. Government Backed Financing*

Conventional financing is market-rate priced loans provided by private lending institutions such as banks and mortgage companies. To assist households that may have difficulty in obtaining home mortgage financing in the private market due to income and equity issues, several government agencies offer loan products that have below market interest rates and are insured by the agencies. Sources of

government-backed financing include loans insured by the Federal Housing Administration (FHA – Insured) and the Department of Veterans Affairs (VA-Guaranteed). These loans are typically provided through private lending institutions and allow a household to qualify when they would otherwise not.

*Home Mortgage Disclosure Act (HMDA) Data Analysis*

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is carried out by the Federal Reserve’s Bank. This Act provides the public loan data that:

- provides information on whether financial institutions are serving the house needs of their service areas;
- provides information to public entities to determine where a shortage of credit may exist and identifying any potential discrimination patterns.

This information is derived from loan applications where lenders are required to disclose race, gender and annual income of the applicant.

For this analysis HMDA data records were pulled for Clovis census tracts from the most recent year available, the calendar year of 2017. A total of 764 records were available for review and are analyzed in this section in great detail.

*Home Purchase Lending*

The records that indicate the environment for owner-occupant households to obtain credit for a purchase of a home indicate a total of 764 applications had been submitted in the 2017 reporting period. Table 15 shows the number of applications that were financed and the status for loan applications that were not approved.

TABLE 15: HOME PURCHASE LOANS IN CLOVIS

Result	FHA/FSA/RHS/VA	Conventional	Total	Percentage
Loans Originated (funded)	203	412	615	80.6%
App Denied	21	35	56	7.3%
App Withdrawn	32	47	79	10.3%
File Closed for Incompleteness	5	9	14	1.8%
Total Applications	261	503	764	100.00%

Source: 2017 HMDA Data

*Loan Type*

The financed loans and denied loans are broken out by source of capital in Table 15. The bulk of the loans were underwritten by conventional banks but government backed mortgage programs made up a significant portion of the lending activity.

*Race and Ethnicity*

Table 16 indicates loan applicants by race and ethnicity. Fifty-one percent of loan applicants indicated being a minority. Determined separately is the race category, 28% indicated being Hispanic or Latino.

*Lending Outcomes*

Table 16 shows lending outcomes by race. Eighty percent of all primary residence loan applications are approved and financed. Eight percent of loan applications were denied distributed evenly across all groups. Table 17 shows lending denial reason by race, ethnicity and income. The most often denial reason for all groups lack of collateral.

TABLE 16: APPLICATIONS RECEIVED AND RESULTS BY RACE & ETHNICITY

Category <b>Race</b>	Received		Originated		Applications Denied		Withdrawn		Incomplete	
	#	%	#	%	#	%	#	%	#	%
American Indian/Alaska Native	11	1%	9	82%	1	9%	1	9%	0	0%
Asian	70	9%	58	83%	5	7%	4	6%	3	4%
African American or Black	12	2%	10	83%	1	8%	4	8%	0	0%
Nat Hawaiian/Pacific Islander	4	1%	4	100%	0	0%	0	0%	0	0%
White	632	83%	508	80%	46	7%	68	9%	10	2%
Race Not Available	35	4%	26	74%	3	8%	5	14%	1	3%
	764	100%	615	80%	56	8%	79	10%	14	2%
<b>Ethnicity</b>										
Hispanic or Latino	198	26%	151	76%	16	8%	28	14%	3	2%
Not Hispanic or Latino	538	70%	447	83%	37	7%	45	8%	10	2%
Ethnicity Not Available	28	4%	17	60%	3	10%	6	2%	1	4%
	764	100%	615	80%	56	14%	79	10%	14	3%
<b>Summary</b>										
White/Non-Hispanic	444	58%	369	83%	30	7%	39	9%	7	2%
Minorities, Incl. Hispanic	295	39%	246	83%	26	9%	28	10%	6	2%
Race/Ethnicity Not Available	25	3%	-	-	-	-	-	-	1	4%
	764	100%	615	80%	56	7%	67	9%	14	2%

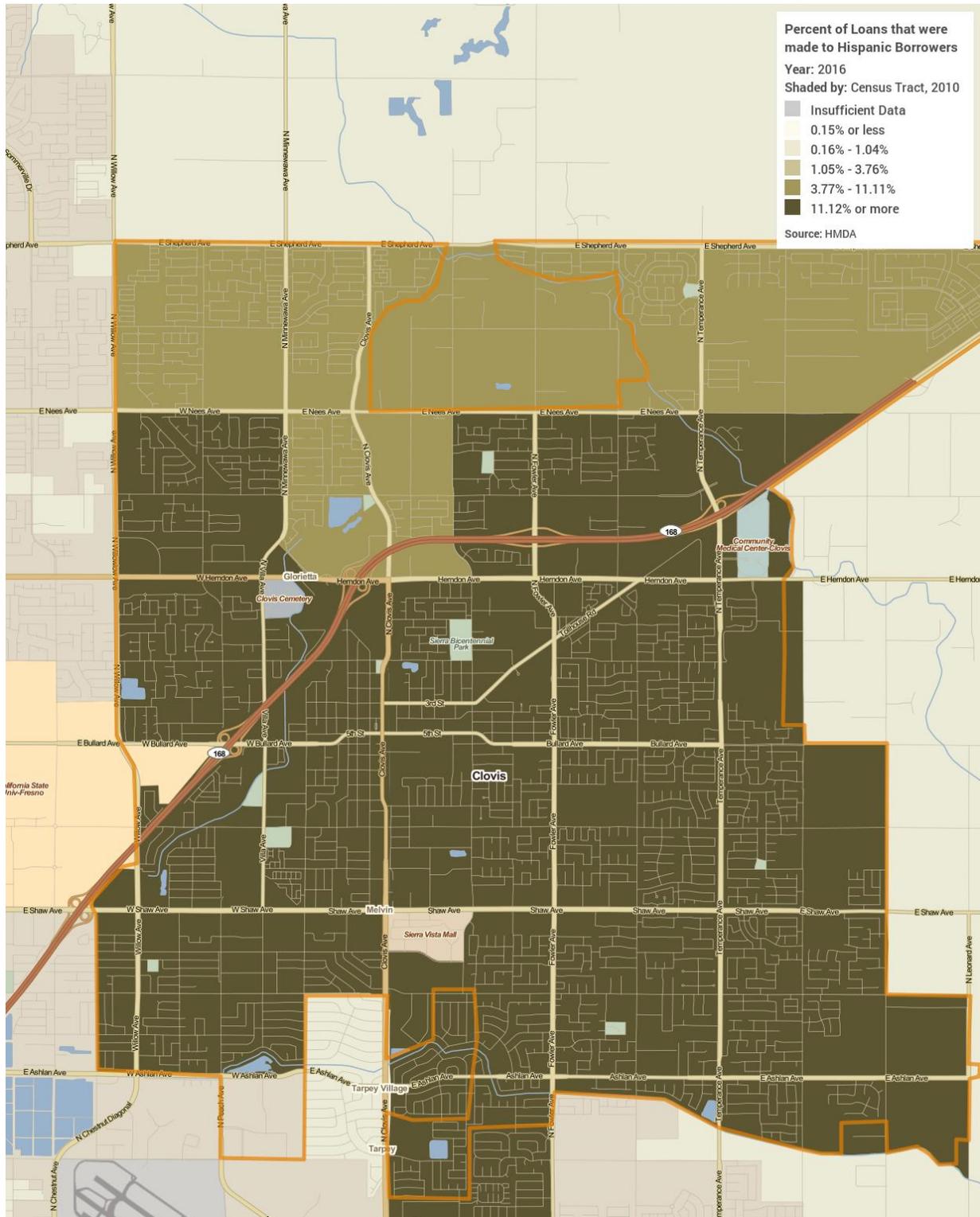
TABLE 17: REASONS FOR DENIAL BY RACE, ETHNICITY, and INCOME

<b>Race</b>	Debt to Income Ratio		Emp. History		Credit History		Collateral		Insufficient Cash		Unverifiable Information	
	#	%	#	%	#	%	#	%	#	%	#	%
American/Alaska Native	0	0%	0	0%	0	0%	1	8%	0	0%	0	0%
Asian	2	25%	0	0%	0	0%	0	0%	0	0%	0	0%
African American or Black	0	0%	0	0%	1	13%	0	0%	0	0%	0	0%
Nat Hawaiian/Pacific Isl.	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	5	67%	1	100%	6	75%	11	84%	2	100%	4	100%
Race Not Available	1	13%	0	0%	1	12%	1	8%	0	0%	0	0%
	8		1		8		13		2		4	
<b>Ethnicity</b>												
Hispanic or Latino	1	13%	0	0%	4	50%	3	23%	0	7%	1	25%
Not Hispanic or Latino	6	75%	1	100%	3	38%	9	69%	2	100%	3	75%
Ethnicity Not Available	1	12%	0	0%	1	12%	1	8%	0	0%	0	0%
	8		1		8		13		2		4	
<b>Race/Ethnicity Summary</b>												
White/Non-Hispanic	6	88%	1	100%	3	34%	8	67%	2	100%	3	75%
Others, Incl. Hispanic	1	12%	0	0%	4	66%	4	33%	0	0%	1	25%
	7		1		7		12		2		4	
<b>Income</b>												
Less Than 50%	1	12%	0	0%	0	0%	0	0%	0	0%	0	0%
50-79%	-	0%	0	0%	0	0%	2	15%	0	0%	0	0%
80-99%	1	13%	0	0%	2	25%	1	9%	1	50%	0	0%
100-119%	1	12%	1	100%	2	25%	5	38%	1	50%	0	0%
120% or more	4	50%	0	0%	4	50%	5	38%	0	0%	4	100%
Income Not Avail.	-	0%	0	0%	0	0%	0	0%	0	0%	0	0%
	8		1		8		13		2		4	

### Mortgage Lending by Area

In addition to analyzing lending outcomes for individual applicant characteristics, it is important to analyze lending activity by area. Map 9 shows where the loans were made to Hispanic borrowers.

#### MAP 9: 2016 LOANS MADE TO HISPANIC BORROWERS



*HMDA Data Analysis Summary*

The analysis of the HMDA data does not show disparities in race and ethnicity in regards to obtaining financing to purchase a home. Geographically loans are being made across the City without deference to race or ethnicity.

**Fair Housing Complaints and Enforcement**

Patterns of complaints and enforcement are useful to assess the nature and level of potentially unfair or discriminatory housing practices in the private sector. Several public and private agencies may receive complaints about unfair housing practices or housing discrimination.

At the federal level, the Office of Fair Housing and Equal Opportunity (FHEO) of the Department of Housing and Urban Development receives complaints of housing discrimination. FHEO may act on complaints if they represent a violation of federal law and FHEO finds there is reasonable cause to pursue administrative action in federal court. The FHEO was contacted and provided the data as supplied in Table 18. Twelve Complaints were filed, eight have been closed over the five year reporting period. Seven of those were determined to not have cause, two were settled, and the remaining three have not been closed.

**TABLE18: CLOVIS HOUSING DISCRIMINATION COMPLAINTS FILED WITH HUD/FHAP**

Filing Date	Closure Date	Closure Reason	Bases	Issues
04/21/15	03/14/16	No cause determination	Religion	Discriminatory refusal to rent; Discriminatory advertising, statements and notices
09/24/15	07/01/16	No cause determination	Disability	Failure to make reasonable accommodation
10/27/15			Disability	Using ordinances to discriminate in zoning and land use
01/27/16	01/06/17	No cause determination	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices
04/05/16			Disability	Using ordinances to discriminate in zoning and land use
11/07/16	08/16/17	No cause determination	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices
03/22/17	04/20/17	Conciliation/settlement successful	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
05/18/17	05/18/18	No cause determination	National Origin, Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)
08/02/18	10/18/18	Conciliation/settlement successful	Religion	Discriminatory terms, conditions, privileges, or services and facilities
09/25/18	11/26/18	No cause determination	Race	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts
03/14/19			Sex, Retaliation	Other discriminatory acts
03/14/19			Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)

At the state level, the Department of Fair Employment and Housing (DFEH) as a similar role to FHEO. DFEH also receives, investigates, attempts to settle, and can take administrative action to prosecute violations of the law. DFEH receives funding from HUD to enforce fair housing in the state. The DFEH was contacted and was only able to provide data at a county level. The report, located here: <https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2018/08/August302018AnnualReportFinal.pdf> shows 19 complaints were filed for 2017 for all of Fresno County. Details on the results of those cases were not broken out.

The City of Clovis does not appear to have a significant problem in the private sector regarding unfair housing practices or housing discrimination. A total of 12 complaints were filed over five years, of which 7 were closed due to no cause being found, 2 were settled and three have not been closed. However, the City needs to ensure all citizens are aware of fair housing law and the agencies available to assist in ensuring fair housing law compliance as residents unfamiliar with fair housing law may not know when their rights are being violated and thus should file a complaint.

## **PUBLIC POLICIES**

### **City Programs**

The City of Clovis offers multiple programs that encourage fair housing choice or support the City's efforts to remove regulatory barriers to equal housing opportunities. Most of the programs promote affordable housing opportunities for low- to moderate income households (up to 80% or 120% of area median income) and preserve the City's existing housing stock.

#### **First-Time Homebuyer Program**

The City of Clovis has a long tradition of providing first-time homebuyers with affordable purchasing opportunities. In partnership with local non-profits and the City's Redevelopment Agency, the City constructs and sells new homes throughout the year. In addition, the City recently received an award of HOME funds from the State of California to begin a down payment assistance program. This will further bolster opportunities for low-income households to purchase homes in Clovis. There is significant demand for these programs despite the current downturn in the housing market.

#### **Home Repair Grants Program**

The City utilizes CDBG funds to provide grants to low-income homeowners in Clovis. The grants allow for repairs of health and safety issues. This program is very popular with strong interest year-to-year.

#### **Affordable Multi-Family Development Program**

The City works with non-profit developers to secure financing for the construction of affordable multi-family projects in Clovis. Recently this has resulted in the award of both new market tax credits for senior supportive housing (24 units) and low income housing tax credits for 60 multi-family units.

#### **Capital Improvement Program**

The City of Clovis allocates CDBG funding every year for the improvement of infrastructure in low-income neighborhoods. Improvements include street and alley reconstruction, park improvements, ADA improvements, and sidewalk repair. This targets funding into neighborhoods where the City is making an investment with its affordable housing funds to ensure a quality neighborhood.

#### **Area-Based Policing/Code Enforcement**

The City utilizes a Community Service Office utilizing CDBG funding to provide additional policing activities in eligible CDBG areas. Much of this effort has been targeting housing conditions with a goal of providing decent, safe, and sanitary housing for all residents of Clovis.

### **Building and Planning Practices**

Public policies established at the state, regional, and local levels can affect housing development and therefore may have an impact on the range and location of housing choices available to residents. This section discusses the public policies enacted by the City and their potential impacts on housing development. Zoning and housing related documents (such as housing elements and consolidated plans)

were reviewed to identify potential impediments to fair housing choice and affordable housing development.

### **Building Codes**

The City of Clovis has adopted the California Building Code (2017), California Mechanical Code (2017), California Plumbing Code (2017), California Electrical Code (2017), and California Energy Code (2017). The City has not made substantive amendments to the code that would adversely affect standard types of housing.

### **Housing Element Law and Compliance**

As part of identifying impediments to fair housing choice, the City of Clovis' Housing Element was reviewed. California housing element law requires that local governments adequately plan to meet the existing and projected needs of all economic segments of the community. The housing element law requires the City to:

- Identify adequate sites which will be made available through appropriate zoning and development standards and with the services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the City's regional housing needs.
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing.
- Conserve and improve the condition of the existing affordable housing stock.
- Promote fair housing opportunities for all persons.

### **Land Use Policies and Practices**

The City's ordinances contain a variety of zoning districts that allow a range of housing opportunities. Table 19 indicates zoning districts and the types of housing allowed in each. No significant barriers were identified for any of the housing types indicated in Table 19 (see page 42).

Analysis of the City's Zoning Ordinance provides for the following residential districts:

- **Agricultural District (A):** The A District identifies areas appropriate for the conservation of productive agricultural lands that can be sustained at an operational level and retain agricultural land in economically viable parcel sizes. The maximum allowable density is one dwelling unit per 20 acres. The A District is consistent with the Agricultural land use designation of the General Plan.
- **Rural Residential District (R-R):** The R-R District identifies areas appropriate for large lot single family uses, within a semi-rural environment. The allowable maximum density is one dwelling unit per two acres, with a density range of 0 to 0.5 dwelling units per acre. The R-R District is intended to provide for lower-density development and small scale agricultural operations. The R-R District is consistent with the Rural Residential land use designation of the General Plan.

- Single-Family Residential Very Low Density Districts (R-A, R-1-A, R-1-AH): The R-A, R-1-A, and R-1-AH Districts identify areas appropriate for large lot single family uses. The allowable maximum density is one dwelling unit per 18,000 square feet in the R-1-A and R-1-AH Districts and one dwelling unit per 24,000 square feet in the R-A District, with a density range of 0.6 to 2.0 dwelling units per acre. The R-A, R-1-A, and R-1-AH Districts are consistent with the Very Low Density Residential land use designation of the General Plan.
- Single-Family Residential Low Density Zones (R-1, R-1-B, R-1-C): The R-1, R-1-B, and R-1-C Districts identify areas appropriate for conventional single family uses. The allowable density range is 2.1 to 4.0 units per acre, with not more than one dwelling unit per parcel. The R-1, R-1-B, and R-1-C Districts are consistent with the Low Density Residential land use designation of the General Plan when developed within the above density range.
- Single-Family Residential and Single-Family Residential Medium Density District (R-1, R-1-MD): The R-1 and R-1-MD Districts identify areas appropriate for single family uses, including attached and detached single family structures. The allowable density range is 4.1 to 7.0 units per acre, with the level of density determined by compliance with performance standards. The R-1 District is consistent with the Low and Medium Density Residential land use designations of the General Plan. The R-1-MD District is consistent with the Medium Density Residential land use designation of the General Plan.
- Single-Family Planned Residential Development District (R-1-PRD): The R-1-PRD District identifies areas appropriate for single family small lot uses, including attached and detached single family structures on small lots. The allowable density range is 4.1 to 15.0 units per acre, with the level of density determined by compliance with performance standards. The R-1-PRD District requires a planned development permit. The R-1-PRD District is consistent with the Medium and Medium-High Density Residential land use designations of the General Plan.
- Mobile Home, Single-Family District (R-1-MH): The R-1-MH District is appropriate for residential mobile homes and manufactured housing on individual lots. The R-1-MH District is intended as a single family planned unit development with individually owned parcels. The allowable density range is dependent on the underlying single family zoning for each parcel (R-1-18,000 sq. ft., R-1-9,500 sq. ft., R-1-7,500 sq. ft., R-1-6,000 sq. ft.). The R-1-MH District is consistent with the Very Low, Low or Medium land use designations of the General Plan based upon the specific allowed minimum lot size.
- Multifamily Medium-High Density Districts (R-2, R-2-A): The R-2 and R-2-A Districts identify areas appropriate for moderately-dense residential uses, including multifamily apartments, duplexes, townhouses, and small parcel, attached and detached single family uses. The allowable density range is 7.1 to 15.0 dwelling units per acre. The R-2 and R-2-A Districts are consistent with the Medium-High Density Residential land use designation of the General Plan.
- Multifamily High Density Districts (R-3, R-3-A): The R-3 and R-3-A Districts identify areas appropriate for high-density residential uses, including attached and detached single family residential, multifamily apartments and condominiums. The allowable density range is from 15.1 to 25.0 units per acre. The R-3 and R-3-A Districts are consistent with the High Density Residential land use designation of the General Plan. Multifamily Very High Density District (R-4): The R-4 District identifies areas appropriate for high- and very high-density residential uses, particularly in association with mixed-use development. The allowable density range is from

15.1 to 25.0 units per acre, and up to 43 dwelling units per acre in association with mixed-use or transit-oriented development. The R-4 District is consistent with the High Density Residential, Mixed Use, and Transit Center land use designations of the General Plan. Very high-density developments greater than 25 DU/acre up to 43 DU/acre will be allowed when specifically called out in the General Plan or in a specific plan.

- Mobile Home Park (MHP): The MHP District identifies areas appropriate for the accommodation of residential mobile homes and manufactured housing in a mobile home park. The MHP District is intended for multifamily development. The allowable density range is 7.1 to 15.0 dwelling units per acre. The MHP District is consistent with the Medium-High land use designation of the General Plan.
- Mixed Use Overlay District (M-U): The M-U Overlay District provides for the development and/or redevelopment and enhancement of existing developed areas appropriate for the creative mix of retail, professional office, industrial, business park, medical facilities, and residential uses located on the same parcel or within the same project area. Mixed-use development projects may either be freestanding within a project area, or combined within a single structure, and ensure compatible design standards, shared internal circulation, and related considerations. All uses allowable in the particular base zoning district with which the M-U Overlay District is combined shall be in compliance with Section 9.18.040 (M-U (Mixed Use) Overlay District standards). The M-U Overlay District is consistent with the Mixed Use land use designation of the General Plan Conclusion.
- In order to comply with the City's Housing Element work plan the City rezoned nearly 200 acres to allow for 35 units or more per acre by right. This zone covers vacant parcels that are between 1-10 acres and have been reviewed for the ability to develop. Projects utilizing this overlay are held to the R-4 District as detailed above and have the ability to utilize the City's Housing Density Bonus Ordinance as well.

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

TABLE 19: DEVELOPMENT STANDARDS BY RESIDENTIAL ZONE TYPE

District	District Name	Density Units Per Acre	DUs Per Lot	Lot Coverage	Height	Minimum Lot Area	Minimum Lot Dimensions		Minimum Setback		
							Width	Depth	Front	Side	Rear
A	Agricultural	.05	One	30%	35 Ft.	20 acres	250	500	35	10	20
R-R	Rural Residential	.5	One	30%	35 Ft.	2 acres	110	130	35	10	20
R-A	Single Family Residential	1.82	One	30%	35 Ft.	24,000 Sq. Ft.	110	130	35	10	20
R-1-A R-1-AH		2.42	One	30%	35 Ft.	18,000 Sq. Ft.	110	130	35	10	20
R-1-B		3.63	One	35%	35 Ft.	12,000 Sq. Ft.	80	110	35	10	20
R-1-C		4.84	One	40%	35 Ft.	9,000 Sq. Ft.	70	110	25	7	20
R-1 (7,500) (8,500) (9,500) (18,000) (24,000)		Single Family Residential Min. lot size 6,000 SF	7.26 5.80 5.12 4.59 2.42 1.82	One	40%	35 Ft.	Designated by Zone Classification	60	100	20	5
R-1-MD	Single-Family Residential Medium Density		One	45%	35 Ft.	4,000 sq. ft.	50	90	15	5	15
R-1-PRD	Single-Family Residential Planned Residential Development	PD <sup>4</sup>	One	PD <sup>4</sup>	35 Ft.	PD <sup>4</sup>	PD <sup>4</sup>	PD <sup>4</sup>	PD <sup>4</sup>	PD <sup>4</sup>	PD <sup>4</sup>
R-1-MH	Single-Family Residential Mobile Home District	15	One	40%	35 Ft.	Based on sub- zone	60	100	20	5	20
MHP	Mobile Home Park, Multi-Family	15	One/ 2,904 Sq. Ft.	45%	35 Ft.	3 Acres	110	130	15	5	10
R-2 R-2-A	Low Density Multiple Family Residential	14.52	One/ 3,000 Sq. Ft.	45%	35 Ft. (20 Ft. in R-2-A)	7,200 Sq. Ft.	60	100	20	5	20
R-3 R-3-A	Medium Density Multiple Family Residential	21.78	One/ 2,000 Sq. Ft.	45%	35 Ft. (20 Ft. in R- 3-A)	8,500 Sq. Ft.	60	120	15	5	15
R-4	High Density Multiple Family Residential	43.00	One/ 1,000 Sq. Ft.	60%	50 Ft. or 4 stories <sup>2</sup>	10,000 Sq. Ft.	65	110	15	5	15
MHP	Trailer Park	18.15	One/ 2,400 Sq. Ft.	45%	35 Ft.	3 Acres <sup>3</sup>	110	130	15	5	10

1 Standards based on normally-sized buildings on interior lots facing local streets.

2 Heights over four stories are permitted subject to a conditional use permit.

3 Under a planned unit development approval, individual lots in the mobile home park may be less than three acres.

4 Determined during Planned Development approval.

**TABLE 20:  
CLOVIS RESIDENTIAL PARKING REQUIREMENTS**

Residential Use		Required Parking Spaces
Single Family Units		2/unit
Multifamily Units	Studio	1 covered & 1 uncovered / unit
	1 BR	1 covered & 1 uncovered / unit
	2 BR	1 covered & 1 uncovered / unit
	3 or more BR	1 covered & 2 uncovered / unit
	Residential planned unit development unit	2-car garage and 1 uncovered / unit
Senior residential Housing	Semi-Independent/dependent units	0.5 spaces per unit
	Independent units	1.25/unit plus 1 per employee or established by conditional use permit
Second Dwelling Units		1 additional off-street space

Under several Master Planned Community Zone Districts, parking requirements have been reduced for High and Very High Residential categories, to accommodate densities and to take advantage of shared parking facilities with other land use categories. The parking standards for multifamily units, particularly studio and one-bedroom multifamily units, exceed the standards in other nearby jurisdictions. The Housing Element includes a program to review residential parking standards and consider possible modifications to remove barriers.

### **Residential Care Facilities and Disabled Persons Housing**

The City has actively removed constraints on the development of housing for persons with disabilities. These actions are intended to keep the cost of disabled-accessible housing as low as possible. Group homes are allowed in any zone district. Furthermore, the City has no requirements restricting the proximity of such homes to one another, nor requirements restricting the number of unrelated adults allowed in a single home beyond the adopted state regulations.

The Clovis Municipal Code as:

*Two (2) or more people related by blood or legal status or persons not related who are functioning as a family or single-housekeeping unit, meaning that they have established ties and familiarity with each other, jointly use common areas, interact with each other, and share meals, household activities, expenses and responsibilities. Membership in the family is fairly stable as opposed to transient and members have some control over who becomes a member of the family. Family does not include a fraternity, sorority, club, or other group occupying a hotel, other transient lodging, or institution of any kind. This definition is potentially a constraint on housing for persons with disabilities since it defines a family based on membership.*

There are no provisions in the CMC that describe any maximum concentration requirements for residential care facilities.

Although there is no provision in the City’s Municipal Code for parking requirement reductions for the development of disabled, there is a mechanism by which developers can receive a density bonus that may lead to such a reduction. The Density Bonus Ordinance (CMC Chapter 9.5) allows developers to provide fewer than the required parking spaces in a given development when 20 percent of the units in

that development are set aside for low- or moderate-income residents. This provision may directly benefit developments providing handicapped housing, as individuals with disabilities often rely on such low- to moderate-income housing projects.

The Building Division within the City reviews all proposed development for compliance with handicap accessibility requirements. The City has adopted the Uniform Building Code (2017) as a standard for development within the City, and has not adopted any amendments that could diminish the ability to accommodate persons with disabilities. Representatives from the Building Division have indicated that each proposed development that will be open to the public, including multi-family residential developments, are subject to review for ADA compliance and all other applicable regulations. Such reviews include field checks.

The City also makes every effort to accommodate disabled individuals at all public meetings. On each City Council and Planning Commission agenda, the following notice is included:

*In compliance with the Americans with Disabilities Act, if you need special assistance to access the City Council Chamber to participate at this meeting, please contact the City Clerk or General Services Director at (559) 324-2060. Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to the Council Chamber.*

When contacted regarding accessibility issues, City staff will provide for the participation of disabled individuals by supplying assisted listening devices, print enlargers, sign language interpreters, and other necessary accommodations, as well as generally providing for the physical mobility of all participants.

### **Multifamily**

Multiple family dwellings are permitted by right in the R-2, R-3 and R-4 zones. Manufactured Housing in compliance with State law, the City's Development Code does not differentiate between single family homes and mobile homes on permanent foundations. The City allows manufactured homes in all zones allowing residential uses.

### **Farm worker/Employee Housing**

Under California Health and Safety Code 17021.5 (Employee Housing Act), farm worker housing up to 12 units or 36 beds must be considered an agricultural use and permitted in any zone that permits agricultural uses. The City permits agricultural uses in the Agricultural (A), Rural-Residential (R-R), and Single-Family Residential Very Low Density (RA) zones. In addition, the Employee Housing Act requires employee housing for six or fewer employees to be treated as a single family use and permitted in the same manner as other dwellings of the same type in the same zone. The City did not comply with this stipulation when the 2016 Housing Element was adopted but now does.

### **Emergency Shelters; Transitional and Supportive Housing**

State law requires jurisdictions to provide adequate sites for a variety of housing types including emergency shelters and transitional/supportive housing. The City Zoning Ordinance provides emergency and transitional housing "by right," in the C-2 zone district, and transitional housing in the R-3 zone district with the approval of a conditional use permit. There is currently 116 acres of vacant C-2 zoned property within the City. Emergency and transitional uses would only be subject to the same development standards as any other "by-right" use within the C-2 zone district. R-3 zoned areas

correspond to the High Density residential designation of the General Plan as well as specific mixed-use area designations that provide for a proportion of high-density residential uses.

### **Single Room Occupancy Units**

The City had no provisions in the Development Code to allow the development of SRO units when the 2016 Housing Element was adopted but now does.

### **Group Homes**

The City complies with the Lanterman Act; State-licensed group homes for six or fewer are permitted in any residential district. Additionally, group homes for seven or more are allowed with a conditional use permitted in R-3 and C-2 zones.

### **Second Units**

The City complies with State law. The City Development Code permits attached and detached second units ministerially in all single-family residential and multi-family residential zones. The development standards include a maximum size of 640 square feet for a second-unit and not more than one bedroom, and a parking requirement of one additional off-street parking space for the second-unit. The Planning Director approves second unit applications based upon the following conditions:

- the dwelling conforms to the development standards of the zoning district;
- the unit shall be architecturally compatible, having similar materials and style of construction, with the primary unit and shall be consistent with the residential neighborhood character;
- public and utility services are adequate to serve both dwellings;
- the accessory dwelling unit shall have separate services for water, sewer, gas, and electric;
- three off-street parking spaces are required for the main and accessory dwelling units.

The City recently provided free standard plans for residents to utilize and has had ten units constructed to date. Additionally, the City has piloted a special financing tool for low-income homeowners to be able to construct a unit in partnership with Self-Help Enterprises and CalHFA.

### **On- Off-Site Improvement Standards**

Typical on- and off-site improvement requirements for a single family tract map and a multifamily project are as follows:

- Installation of transmission and distribution sewer, water, and non-potable mains, backflow preventer (multifamily only), and sewer and water services. If sewer and water mains already exist, the fees in the amount of \$19.80/foot and \$24.80/foot are required.
- Interior streets—standard 54 feet of right-of-way, which includes the installation of curb, gutter, sidewalks, street lights, drive approaches, and handicap ramps. Typical interior street widths are 40 feet from curb to curb.
- Major streets—standard 80 feet to 106 feet of right-of-way, which includes the installation of curb, gutter, sidewalks, street lights, drive approaches, handicap ramps, median islands with landscaping

and irrigation, and landscape strips. Permanent street improvements construction costs can be used to offset certain major street development fees.

- Park improvements or fees in-lieu of improvements.
- Other agencies' requirements—Installation of storm drain, irrigation, utilities lines.
- Trash enclosures (multifamily only).

Development requirements of the City of Clovis are considered standard in the Central Valley and are comparable to surrounding cities. The City does not consider the requirements to be greater than those necessary to achieve health and safety requirements.

## **Fees and Exactions**

Table 29 shows development impact and permit fees for single-family and multi-family prototype developments. The single-family prototype is a single-family detached residential dwelling unit with 2,000 square feet of living area and a 440-square-foot garage that is designated Low Density Residential and developed at four units to the acre. The estimated construction cost for this prototype unit before permit fees is about \$200,000. The plan check, permit, and impact fees account for an additional sum of \$35,479, or approximately 17.7 percent of the estimated construction cost. The multi-family prototype is a 20-unit, two-story multi-family housing development located in the High Density Residential designation and developed at 20 units per acre. Each dwelling unit is 1,000 square feet. The estimated construction cost for this prototype before permit and impact fees is roughly \$170,000 per unit. In summary, the fees for plan check, permits, and development impact total \$32,661 per unit. This constitutes approximately 19.2 percent of the estimated construction cost.

In addition to City fees, several regional fees are also charged for residential development: Regional Transportation Mitigation and Indirect Source Review. For school fees, the Clovis Unified School District assesses a school impact fee of \$3.78 per square foot on all new residential development.

The table can only reflect a fee estimate, since it is not feasible to take all possibilities into consideration. Fees can vary considerably, dependent upon whether or not improvements such as water and sewer lines, streets, curbs, or gutters exist.

Development impact fees are an estimated 17.7 percent of the total development costs for single family development and 19.2 percent for multifamily development. The City's development impact fees are well below the statewide average, constitute a relatively minor proportion of total development cost, and, therefore, do not constitute a constraint to the production or improvement of housing.

If fees are not paid, then either these improvements cannot be constructed or their cost must come from other services or increased taxes. The policies of the State in mandating local requirements have specified fees as the method of financing. If a developer installs public improvements, these are credited against their fees, reducing fee burden.

TABLE 21: TYPICAL FEES FOR SINGLE AND MULTI-FAMILY DEVELOPMENT

Type of Fee	Cost Per Unit	
	Multi-Family	Single-Family
<b><i>Building Fees</i></b>		
Site Plan Review	\$248 <sup>1</sup>	\$775 <sup>2</sup>
<b><i>Subtotal</i></b>	<b><i>\$248</i></b>	<b><i>\$775</i></b>
<b><i>Development Impact/Engineering Fees</i></b>		
Sewer Major Facilities	\$9,002	\$8,192
Oversize Sewer	\$43	\$215
Major Facilities – Water	\$1,919	\$4,886
Oversize Water	\$62	\$309
Water Supply Fee (within the Jurisdiction of FID)	\$3,940	\$0
Transceiver	\$168	\$168
Non-Potable Water System	\$28	\$140
Outside Travel Lane	\$2,661	\$4,435
Center Travel Lane	\$1,315	\$2,192
Traffic Signal	\$462	\$769
Bridges	\$74	\$124
Quad Intersection Fee	\$33	\$56
Community Sanitation Fee	\$374	\$212
Parks and Recreation	\$3,230	\$3,230
Library	\$604	\$494
Fire Department	\$672	\$672
Police Department	\$100	\$100
School	\$7,560	\$3,780
Administration Fee (1% of fees)	\$247	\$262
<b><i>Subtotal</i></b>	<b><i>\$32,494</i></b>	<b><i>\$30,236</i></b>
<b><i>Regional Impact Fees</i></b>		
Regional Transportation Mitigation <sup>3</sup>	\$1,637	\$1,150
Indirect Source Review <sup>4</sup>	\$1,100	\$500
<b><i>Subtotal</i></b>	<b><i>\$2,737</i></b>	<b><i>\$1,650</i></b>
<b>TOTAL</b>	<b>\$35,479</b>	<b>\$32,661</b>

<sup>1</sup> Assumes development does not require Planning Commission meeting.

<sup>2</sup> Assumes lot is not part of a subdivision.

<sup>3</sup> The regional impact fee is the RTMF (Regional Transportation Mitigation Fee) collected by COG for all Fresno County cities.

<sup>4</sup> The Indirect Source Review fee is collected by the air district for projects larger than 50 units which generally are about \$500/unit.

## Processing

The cost of holding land by a developer during the evaluation and review process is frequently cited by builders as a contributing factor to the cost of housing. The California Government Code establishes

permitted time periods for local agencies to review and act upon private development proposals. These time restrictions are identified in Table 22.

**TABLE 22: STATE DEVELOPMENT PROCESSING TIME LIMITS**

<b>Item</b>	<b>State Maximum</b>
General Plan Amendment	None
Zone Change	None
Subdivision Action on Tentative Map (66452.1)	50 Days
Environmental Documentation/CEQA	
Review of Application for Completeness	30 Days
Determination of NEG DEC or EIR Requirement	30 Days
Completion of NEG DEC Requirement	180 Days
Certification of Final EIR	1 Year

Source: California Government Code and *Land Use Practice*, Lindgren et al, (2007)

The City permits most types of residential development by right with a site plan review by the staff. The City encourages concurrent processing of applications and considers all entitlement applications, including the environmental document, at single public hearings before the Planning Commission and City Council. The City's local processing times are identified defined in Table 23.

**TABLE 23: CLOVIS DEVELOPMENT PROCESSING TIME LIMITS**

<b>Item</b>	<b>Approximate Length of Time to Public Hearing</b>
Conditional Use Permit	4 to 6 Weeks to Commission 8 to 10 Weeks to Council
Site Plan Review	4 Weeks
Tentative Parcel Map	6 Weeks
Tentative Tract Map	4 to 6 Weeks
Variance	4 to 6 Weeks
Zoning Amendments or Zone Change	8 to 10 Weeks
Environmental Documentation	4 to 10 Weeks (Average 8 Weeks)
General Plan Amendment	8 Weeks

In response to the need for quality information before a project starts, Clovis instituted the Development Review Committee process (DRC) in 1977. This process allows, but does not require, a developer to submit a preliminary plan for review by City staff and receive verbal and written comments within a one-week time frame. While staff comments are not binding and do not constitute approval or disapproval of a project, the comments are valuable in terms of providing an early exchange of information. The availability of good preliminary information allows a developer to consider a project before committing to it and can save the developer time and money, making the proposed development more cost-effective and competitive in the marketplace, reducing the processing time for a formal application and increasing the success rate for development projects. The City of Clovis provides this service without costs to the developer.

In addition to the DRC, the time and funds expended by the City of Clovis in regard to specific plans also helps reduce the developer's costs associated with the review and evaluation process. Clovis currently implements four specific plans that provide for residential development. Cost reductions associated with the development of land in a specific plan are substantial. Much of the preliminary work, such as obtaining a general plan designation and negotiating with the City regarding street and other off-site improvements, has been pre-determined in the specific plans. Also, when a developer proposes a residential project within five years of the adoption of the specific plan, the developer is excused from the preparation of an Environmental Impact Report (EIR).

### **Density Bonus**

The Density Bonus Ordinance (CMC Chapter 9.5) complied with state law and allows developers to increase the density of a residential development by at least 25 percent if provisions are made for low-income housing. The City may use the density bonus provisions for all residential development areas, with special emphasis in the high and medium-high density residential areas, and mixed use areas, to promote the development of housing and densities appropriate to meet very low and low income housing needs.

### **Available Vacant Land**

Based on permitted densities, vacant land in the City can accommodate an estimated 9,641 units, including 4,614 lower-income units, 2,951 moderate-income units, and 2,000 above moderate-income units. All of these sites are outside of FEMA 100-year flood zones and do not have other environmental constraints that could hinder future development.

### **Accessibility of Public Transit**

Public transit plays an important role in determining the accessibility of housing. Public transit should provide a means for lower-income persons, who are often transit-dependent, to major employers where job opportunities may be available. The lack of an efficient transit system connecting residents to job opportunities and affordable housing may impede fair housing choice because persons who depend on public transit will have limited choice regarding places to live.

Elderly and disabled persons tend to be more transit-dependent than other persons. Specifically, many elderly and disabled persons rely on public transit to visit doctors, conduct shopping, and other day-to-day activities. Housing for elderly and the disabled persons is more attractive if it is located near transit routes. The City of Clovis is committed to providing effective transit services to all residents. The 2017 American Communities Survey found that 856 working residents do not have a vehicle available and 148 persons reported relying on the transit system for daily transportation needs. This is represented in Map 9 geographically. Due to budget constraints the transit system is not as robust as is desired in the community, none the less it does provide basic service for residents who need it the most.

# MAP 9: ZERO VEHICLE HOUSEHOLDS

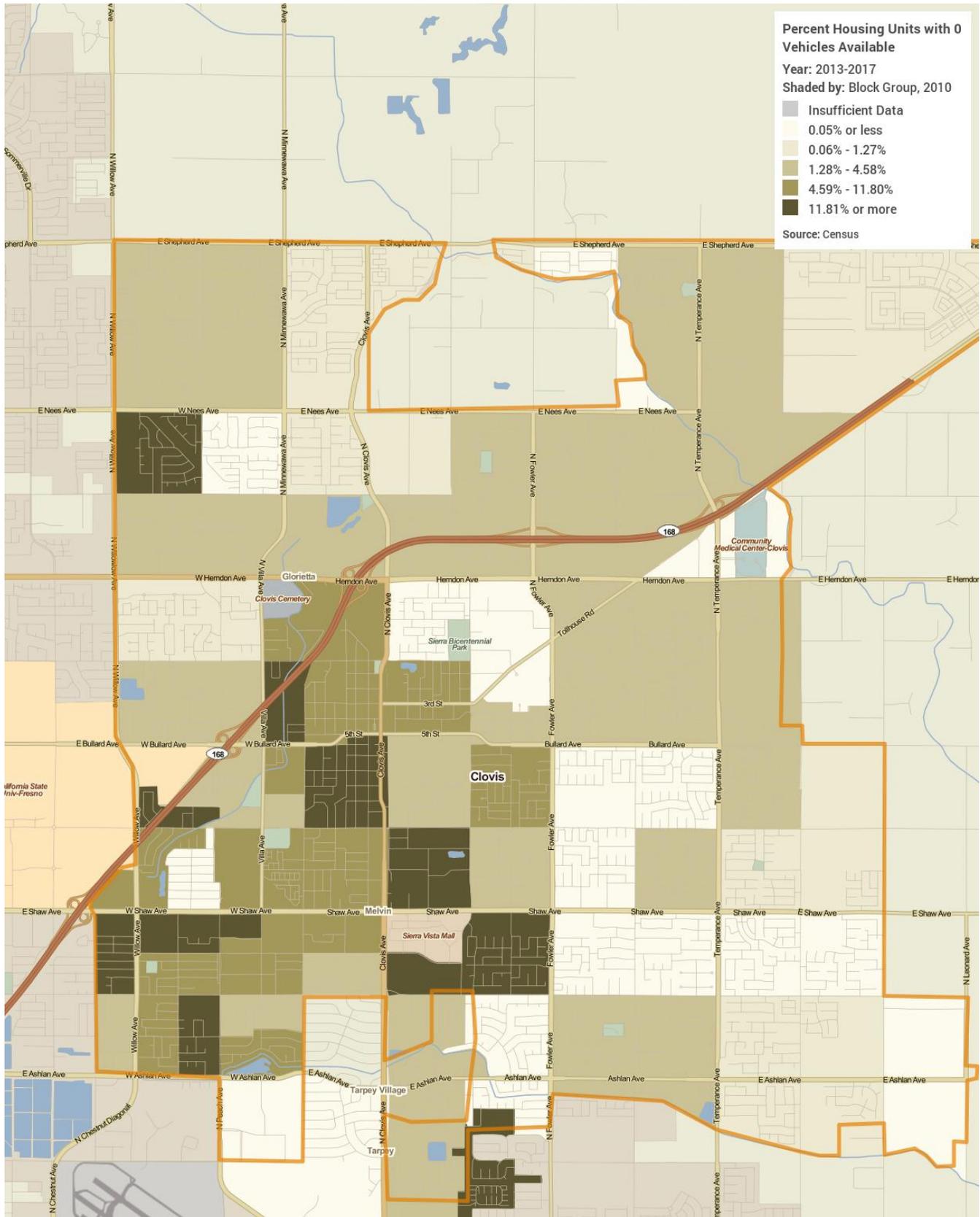


TABLE 24: CLOVIS AFFORDABLE UNITS AT RISK OF CONVERSION

Name	Location	Type of Unit	Form of Assistance	Total/Units at Risk		Subsidy Termination Date
Sierra Ridge Apartments	100 Fowler Avenue	Multi-family	Multi-family Mortgage Revenue Bond	180	36	2020
Cottonwood Grove Apartments	732 N. Clovis Avenue	Multi-family	Multi-family Mortgage Revenue Bond	150	30	1/1/2022
Sierra Hills Apartments	643 Fowler Avenue	Multi-family	Multi-family Mortgage Revenue Bond	114	23	2024
Lexington Square Apartments	1300 Minnewawa Avenue	Multi-family	Tax Exempt Bonds/Tax Credits	130	130	2029
Coventry Cove	190 N. Coventry	Senior	LIHTC	140	28	1/1/2034
Silver Ridge Apartments	88 N. DeWitt Avenue	Multi-family Seniors	Tax Credits/Tax Increment/CDBG	100	100	9/30/2053
Hotchkiss Terrace	51 Barstow Avenue	Multi-family Seniors	HUD Section 202 Grant/Redevelopment Agency Funding	75	75	2060
Willow Family Apartments	865 W. Gettysburg	Multi-Family	Tax Credits/Bonds/Joe Serna Farm Worker/HOME	68	68	1/1/2060
Roseview Terrace	101 Barstow Avenue	Multi-family Seniors	HUD Section 202 Grant/Redevelopment Agency Funding	59	59	11/5/2065
Magnolia Crossing	32 W. Sierra	Senior Supportive Housing	NMTC/ Redevelopment Agency Funding	48	24	2073

Source: City of Clovis

**Sale of Subsidized Housing and Possible Displacement**

The apartments listed in Table 24 provide a total of 582 rent restricted low-income rental units in Clovis. A total of 89 units are at risk of conversion in the next ten years with 66 in the next several years. The cost that would be borne by the City of Clovis for preserving low income housing units would be less than the cost of replacement through new construction.

The cost of preserving the affordable units would be the cost associated with subsidizing those units should the entire rental structure of the complex be converted to average market rates represented in the City. The estimated cost to construct one affordable multiple-family housing unit in the City is \$400,000, which includes land, construction costs, and site improvement costs, based on recent estimated construction cost for a proposed 100% affordable housing project in the City. One method of calculating replacement cost is this figure multiplied by the total number of set-aside units.

There are two types of resources that can be engaged in efforts to preserve affordable units at risk of conversion to market rate: government funding and nonprofit organizations that can acquire and manage assisted units.

CDBG funding is the primary source of potential funding for preservation efforts. Community Development Block Grant funds are provided to local government for a range of community development activities that benefit low-income households. During the 2018-19 fiscal year, the City of Clovis received \$741,062 in CDBG funds. The focus of CDGB allocations has been on infrastructure improvements, affordable housing, and community service programs. Future CDBG funds represent an additional monetary resource for preservation efforts, although historically, funds have been used for public facilities and infrastructure improvements.

Preserving the set-aside units can be accomplished through purchase or management of the complex by a nonprofit organization. This preservation method would eliminate the costs cited above and would eliminate displacement of households while the units are constructed. Additionally, nonprofit organizations have the capacity to manage affordable apartment complexes, whereas local government may not be equipped to assume this role.

### **Property Tax Impacts**

Due to Proposition 13 property taxes in California for long-time property owners are much lower than a recent buyer. This impacts first-time homebuyers significantly. Many buyers cannot afford both a mortgage payment and the corresponding property tax bill. This is true even for the City's affordable housing programs. In cooperation with the County assessor, the City was able to get the tax valuation reduced to the sales price (rather than appraised) for homes participating in the City's programs. Unfortunately, this does not assist buyers who may not be eligible or are pursuing other ownership opportunities. This results in households having to reduce the purchase price of a home, sometimes making home ownership out of reach.

### **Public Housing Authority Assistance Programs**

The City of Clovis is served by The Housing Authority of Fresno County. The Authority does not have any public housing units in Clovis instead relying on the Section 8 Voucher Program to assist households in need. As with many public assistance programs, the funding does not meet the demand. The Authority has a very long waiting list and currently is not taking applications due to funds being oversubscribed. Residents who do not have a voucher assigned but need assistance to obtain housing face very long wait times. This endangers the household of having to choose housing that does not meet their needs. The programs are federally funded and the City is working with the Authority to create more affordable units in Clovis to meet the current demand. The City has assisted in supporting a funding application for Housing Authority of Fresno County project.

### **Assessment of Fair Housing Practices**

At this time, the City refers, as many other Cities do, fair housing complaints to the HUD fair housing enforcement center and/or the Fair Housing Council of Central California. The City assumes a supportive and indirect role to other agencies but does not directly contract with a local fair housing agency. The City identifies activities in two documents with the intent of expanding housing choice, the Housing Element of the General Plan and the Annual Action Plan as part of the Community Development Block Grant program.

### **Housing Element**

On page 2B-1 an Action Plan with various tasks to be completed to address increasing production of housing are provided in the 2016 Housing Element. All programs are being implemented and/or are complete. The document is located here:

<https://cityofclovis.com/wp-content/uploads/2019/02/Clovis-Housing-Element-1.pdf>

## **Findings and Actions**

The purpose of this analysis is to determine possible existence of impediments to housing choices based upon race, religion, sex, color, national origin, disability, or familial status, and, where identified, suggest necessary steps to reduce and/or eliminate such impediments. This section describes those impediments and the corresponding actions identified through the analysis.

The identified impediments are grouped into four broad categories: affordable housing, mortgage lending, fair housing enforcement and education, and governmental barriers. Within each category are one or more impediments followed by one or more actions the City of Clovis plans to undertake to address each impediment. It is important to note that the identification of an impediment does not necessarily identify a deficiency. By identifying the presence of an impediment, this analysis is stating the nature of a problem which actions to address will serve to mitigate. These may be affirmative actions as much as responses to current conditions.

To facilitate reporting of accomplishments and the association of planned activities with impediments and actions to address, each impediment and action is identified by a number. Actions are labeled according to the impediment they address.

Please note that State law requires local jurisdictions in California to assess barriers to affordable housing as part of the General Plan Housing Element. Programs to address impediments to fair housing may be addressed through the implementation of the Housing Element.

### **Affordable Housing**

The provision of affordable housing and the support of existing and new affordable housing is critical to assuring that all households have access to quality housing. The City has affordability issues in both the ownership and rental sectors of the housing market with 12,380 households of 35,538 total households paying more than 30% of their gross income towards housing costs. 5,005 households are paying more than 50% of their gross income towards housing costs, of these 4,315 households are considered low-income households. This equates to 12% of households in Clovis are low-income and paying more than 50% towards their housing costs. While this is better than affordability levels elsewhere in the State of California, it still is an issue in Clovis that warrants focused efforts to alleviate.

#### **1. IMPEDIMENT: Lack of Sufficient Affordable Housing Supply**

**1.1 Action:** Provide assistance to preserve existing affordable housing and to create new affordable housing.

**1.2 Action:** Assure the availability of adequate sites for the development of affordable housing.

**1.3 Action:** Develop strategies to mitigate or preserve affordable multi-family units at risk of conversion to market rate units.

## **2. IMPEDIMENT: Insufficient Funding for Affordable Housing Programs**

**2.1 Action:** Research and apply and partner for alternative private and public funding opportunities that can provide additional support to the City's affordable housing programs and/or developer projects.

### **Fair Housing Education and Enforcement**

Promoting fair housing includes both education and enforcement. The City will continue to support both education and enforcement efforts.

This analysis reported very few complaints to enforcement agencies. This indicates the need for ongoing education to continue the trend of minimal complaints.

## **3. IMPEDIMENT: Lack of knowledge of fair housing rights**

**3.1 Action:** Support efforts to educate persons, including occupants, owners, and agents of both rental and purchase units regarding their fair housing rights and responsibilities.

**3.2 Action:** Support local advocate agencies and community stakeholders in efforts to disseminate fair housing information to the community at large.

## **4. IMPEDIMENT: Lack of information on the nature and basis of housing discrimination**

**4.1 Action:** Monitor the incidence of housing discrimination complaints.

**4.2 Action:** If deemed necessary, create an action item in the City's Annual Action Plan that addresses the trend of discrimination complaints.

### **Governmental Barriers**

Local government can play a significant role in the provision of a full range of housing types and to assuring availability of housing suitable to all sectors of the public. The City offers a wide variety of affordable housing programs and implements land use policies that encourage equitable choice for all persons in Clovis. A key part of housing choice is transportation and due to the City's current density and financial condition, the public transit system is not as robust as the City wishes. The City also needs to work with other governmental agencies to seek funding for rental subsidies and housing projects that reduce housing costs for low-income families.

## **5. IMPEDIMENT: Lack of sufficient public transportation for low-income and special needs populations**

**5.1 Action:** The City will continue to recommend improvements as funds allow to better serve all populations, including low-income and special needs households.

## **6. IMPEDIMENT: Shortage of rental subsidy vouchers**

**6.1 Action:** The City will continue to partner with the Fresno County Housing Authority on both affordable housing projects and obtaining additional funds to support the Housing Choice Voucher Program that is currently oversubscribed and work to develop additional units.