



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

SEPTEMBER 2010

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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 AI is the first conducted by the City as it became an entitlement jurisdiction in July of 2006. 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.

Affordable Housing

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: Offer regulatory relief and incentives in cooperation with the Clovis Community Development Agency for the development of affordable housing.

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

1.4 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 for alternative private and public funding opportunities that can provide additional support to the City’s affordable housing programs.
- 2.2 Action:** Review City’s Affordable Housing Program Guidelines and current market conditions to ensure the most efficient use of available funds.

Mortgage Lending

3. IMPEDIMENT: Differential Origination Rates for households of low-income status including minorities.

- 3.1 Action:** The City will monitor periodically Home Mortgage Disclosure Act (HMDA) data and report significant trends in mortgage lending by race, ethnicity, and household income.
- 3.2 Action:** The City will support activities of local organizations to improve homebuyer loan readiness through pre-purchase counseling, credit counseling, and home-buyer education programs.
- 3.3 Action:** The City will continue to implement its Economic Development Strategy to increase the income levels for all households in Clovis.
- 3.4 Action:** The City will continue to offer and support home purchase programs for low-income households.
- 3.5 Action:** When selecting lending institutions for contracts as part of an affordable housing project or program, the City may prefer lending institutions with a Community Reinvestment Act (CRA) rating of “Outstanding”. The City may exclude those with the rating of “Needs to Improve,” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC).

Fair Housing Education and Enforcement

4. IMPEDIMENT: Lack of knowledge of fair housing rights

- 4.1 Action:** Support efforts to educate persons, including occupants, owners, and agents of both rental and purchase units regarding their fair housing rights and responsibilities.
- 4.2 Action:** Support local advocate agencies and community stakeholders in efforts to disseminate fair housing information to the community at large.

5. IMPEDIMENT: Lack of information on the nature and basis of housing discrimination

- 5.1 Action:** Monitor the incidence of housing discrimination complaints and report trends in the Consolidated Annual Performance and Evaluation Report (CAPER).
- 5.2 Action:** If deemed necessary, create an action item in the City’s Annual Action Plan that addresses the trend of discrimination complaints as identified in the CAPER

Governmental Barriers

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

- 6.1 Action:** The City will continue to study the public transportation system and recommend improvements as funds allow to better serve all populations, including low-income and special needs households.

7. IMPEDIMENT: Shortage of rental subsidy vouchers

- 7.1 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.

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 17th fastest growing county in California. The City was incorporated in 1912 and has experienced robust growth since 1980. Between 1990 and 2007 the population has risen from approximately 42,000 to nearly 100,000 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 person 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

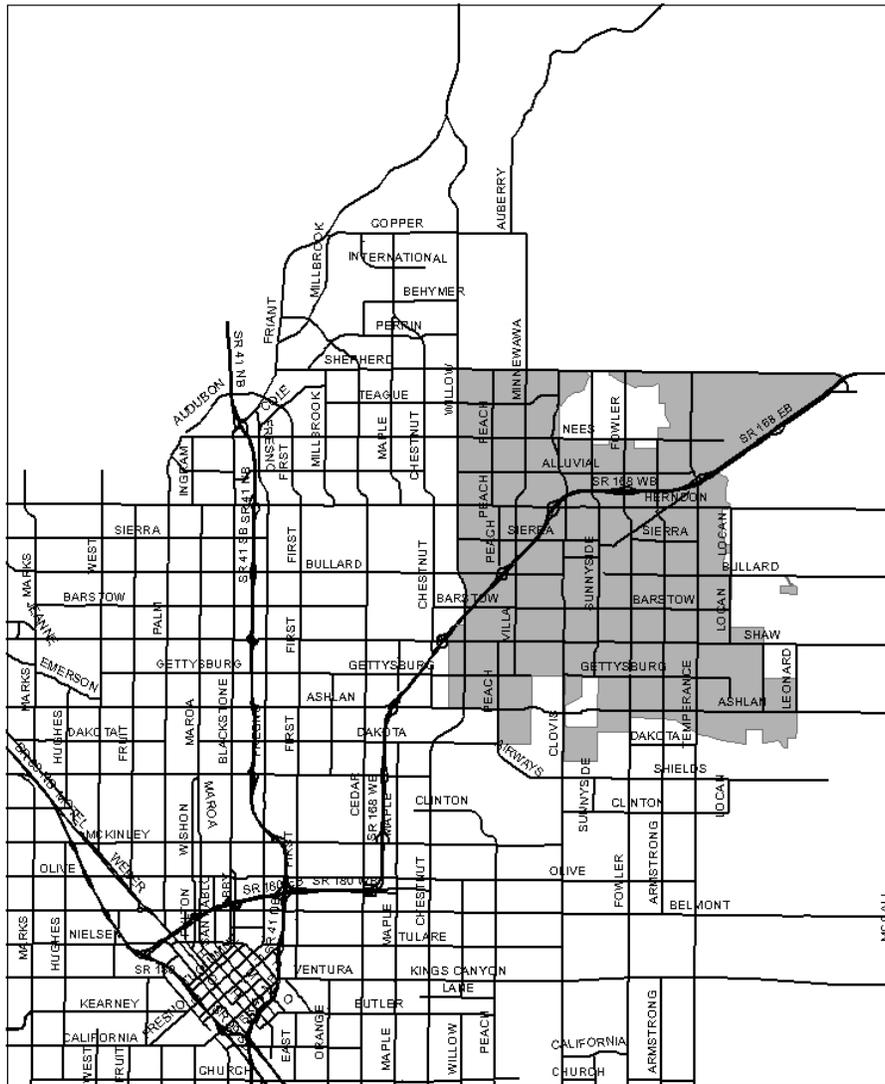
- To provide an overview of the current status of fair housing choice in the City of Clovis
- Review policies of the City and how they impact fair housing choice, focusing on affordable housing and special needs households
- Identify impediments to fair housing choice and determine actions the City will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

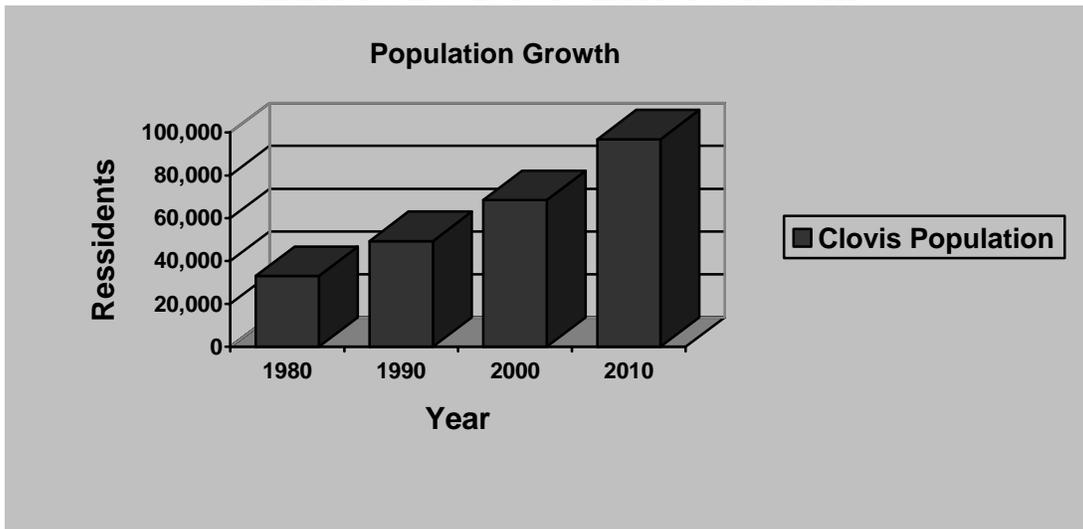


Legend
 City of Clovis Limits

Population Growth

The City of Clovis is one of 15 cities located in Fresno County. The County is experiencing tremendous growth, and is one of the fastest growing regions in the State of California. The City has experienced a notable increase in population over the last ten years. The City’s 2000 population was 70,746; this was an approximate 44 percent increase from a population of 50,000 in 1990. During this same period, Fresno County increased nearly 20 percent, from 667,490 in the 1990 Census to a population 799,407 in the 2000 Census. The current 2007 population of Fresno County is estimated at 953,761 (Department of Finance). The current 2010 City of Clovis population is estimated at 96,868 persons (Department of Finance). The City’s population is anticipated to grow to 133,800 by the year 2020 (Clovis General Plan- 2.9 percent annual growth rate assumption).

CHART 1: CLOVIS POPULATION GROWTH

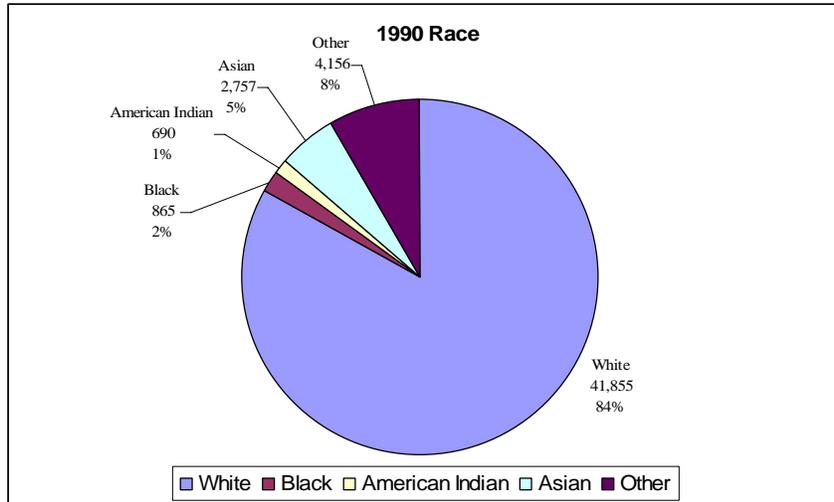


Source: Bureau of Census and CA Department of Finance 2010

Race and Ethnicity

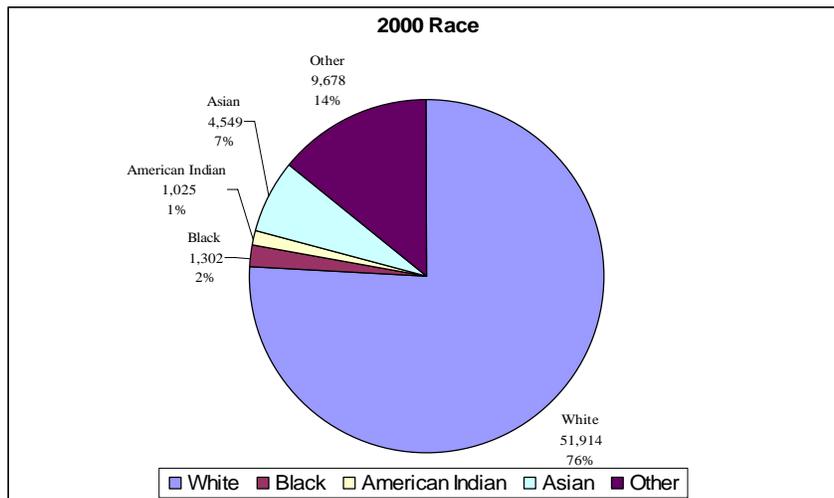
Over the past 25 years changes have occurred in the City’s racial makeup. As indicated in the charts below the percentage of White residents has been decreasing while the percentage of minorities has been increasing. From 1990 to 2006 all minority races have increased, most notably the number of Asian residents has increased by 4,268 or 155% and “Other Races” has increased by 6,847 or 165%. In addition, although not considered a race according the U.S. Census, the number of Hispanics has increased from 8,206 in 1990 to 24,578 in 2006, a 300% increase according to U.S. Census Data. 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 2: 1990 CLOVIS RACE



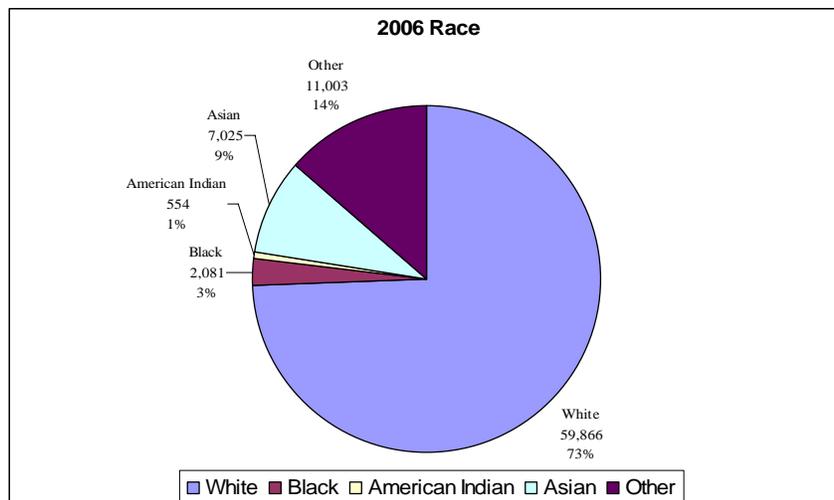
Source: U.S. Census Bureau, Census 1990

CHART 3: 2000 CLOVIS RACE



Source: U.S. Census Bureau, Census 2000

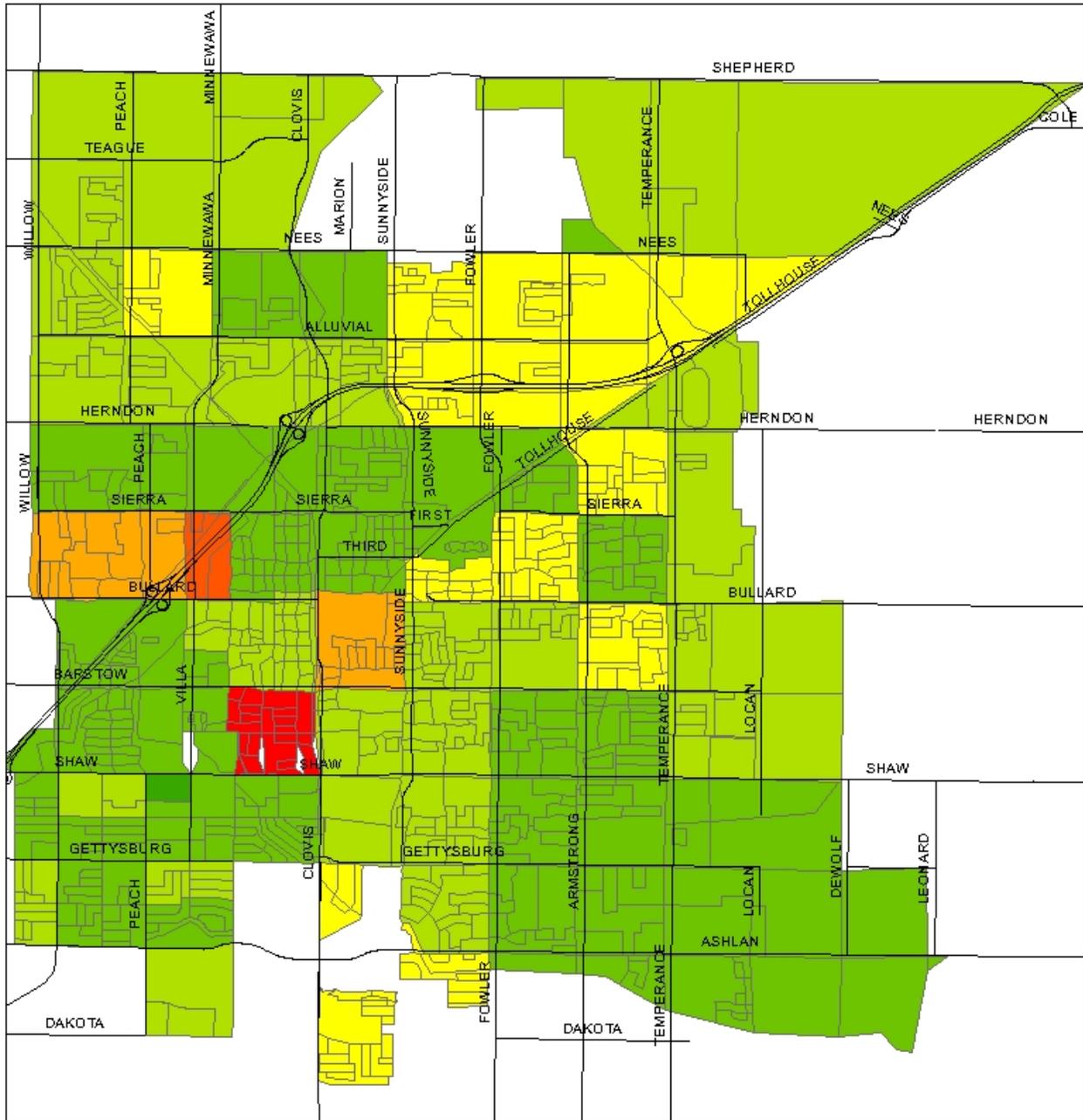
CHART 4: 2006 CLOVIS RACE



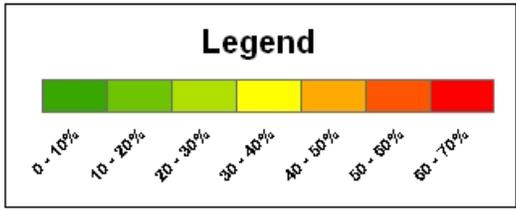
Source: U.S. Census Bureau, American Communities Survey, 2006

The geographical location of minorities that live in Clovis is depicted in Map 2. In general minority concentrations are spread evenly throughout the City although there are several Census Blocks where the concentration is more than twice the average of the City as a whole.

MAP 2: CITY OF CLOVIS MINORITY CONCENTRATION



Source: Census 2000



Education

Compared to other Fresno County cities, the 2006-08 American Communities Survey reports Clovis residents have higher levels of education. In 2000, the percent of Clovis adults 25 years of age or older who had graduated from high school was 85 percent, and 23 percent of residents had attained at least a bachelor's degree or higher. Only 11.1 percent of Clovis residents age 25 or older have less than a high school education or equivalency. Comparatively, over 17 percent of Fresno County residents have less than a high school education or equivalency.¹ 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

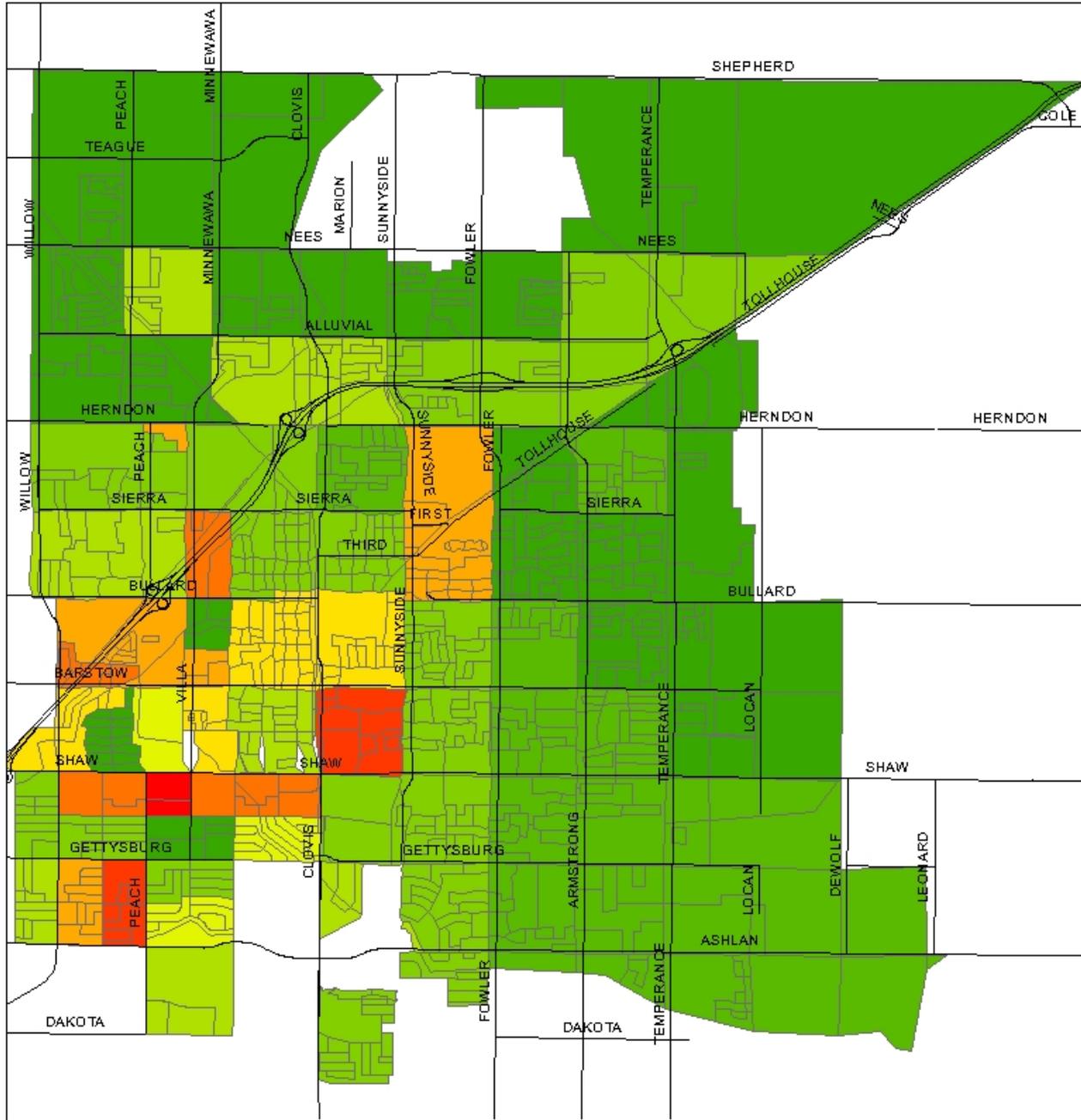
Using 2000 census data, 5,463 of the city's residents are immigrants, which is 8 percent of the total population. Many of these immigrants are from Asia and Latin America. There are 2,604 Asian residents. Before 1980 many of the Asian immigrants were from China and Japan. However, during 1990 to 2000 most Asian immigrants migrated to Clovis from Southeast Asia. The immigrants who are Hispanic is the next largest population representing 1,941 residents. Between 1990 and March 2000, 581 Hispanic residents migrated to Clovis. One-thousand two-hundred and twenty of all immigrants live 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

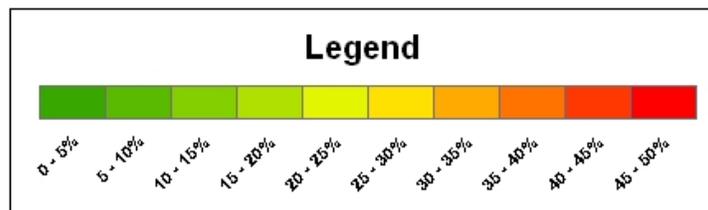
Of the total number of households (24,347), 5,944 are single, male or female headed households with children, which is 33.63% percent of the household population according to the U.S. Census 2000. Nine-Hundred and eighty (16.5%) of these families live in poverty compared to the City's overall rate of 10.6 % showing the need for affordable housing and increased economic opportunities to improve this population's quality of life. As shown in Map 3 many of the Census Tracts with higher than average single-parent households are located in the southwest portion of Clovis.

¹ Census 2000

MAP 3: CITY OF CLOVIS SINGLE PARENT HOUSEHOLD CONCENTRATION



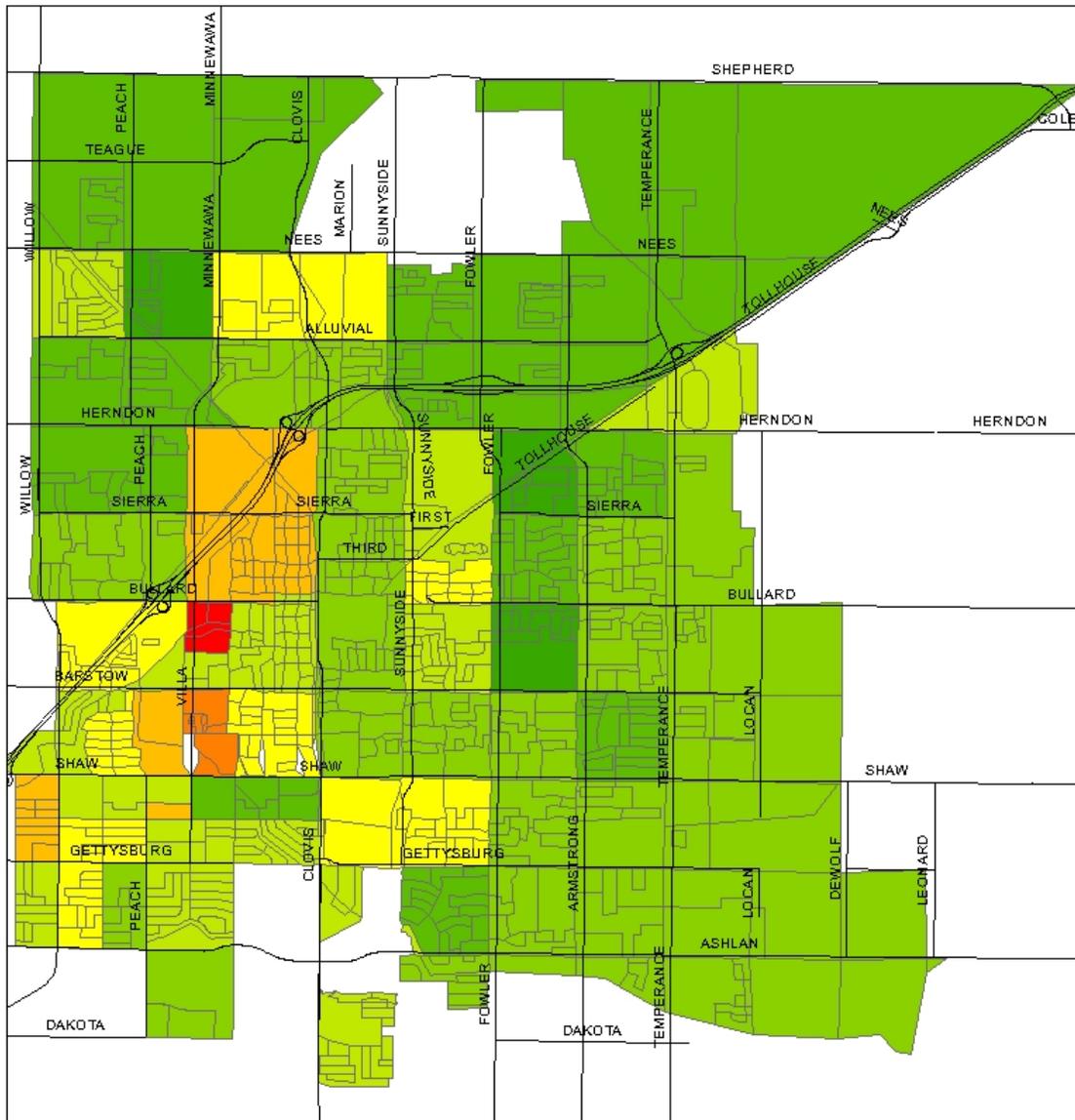
Source: Census 2000



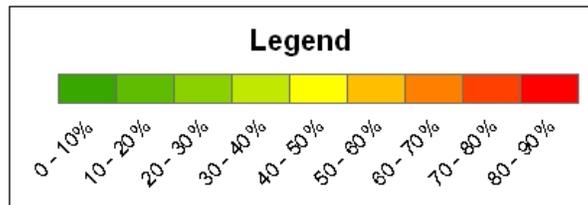
Persons with Disabilities

According to the 2000 Census 11,787 residents of Clovis have some type of disability and 1,667, or 14%, are living in poverty. When compared to the overall poverty rate of 10.6% in the City it is apparent this group faces challenges in meeting their basic needs. Map 4 demonstrates that there are Census Blocks in Clovis where as much as 87% of the population has a disability and the lowest concentration of disabled persons is 8%.

MAP 4: CITY OF CLOVIS PERSONS WITH A DISABILITY CONCENTRATION



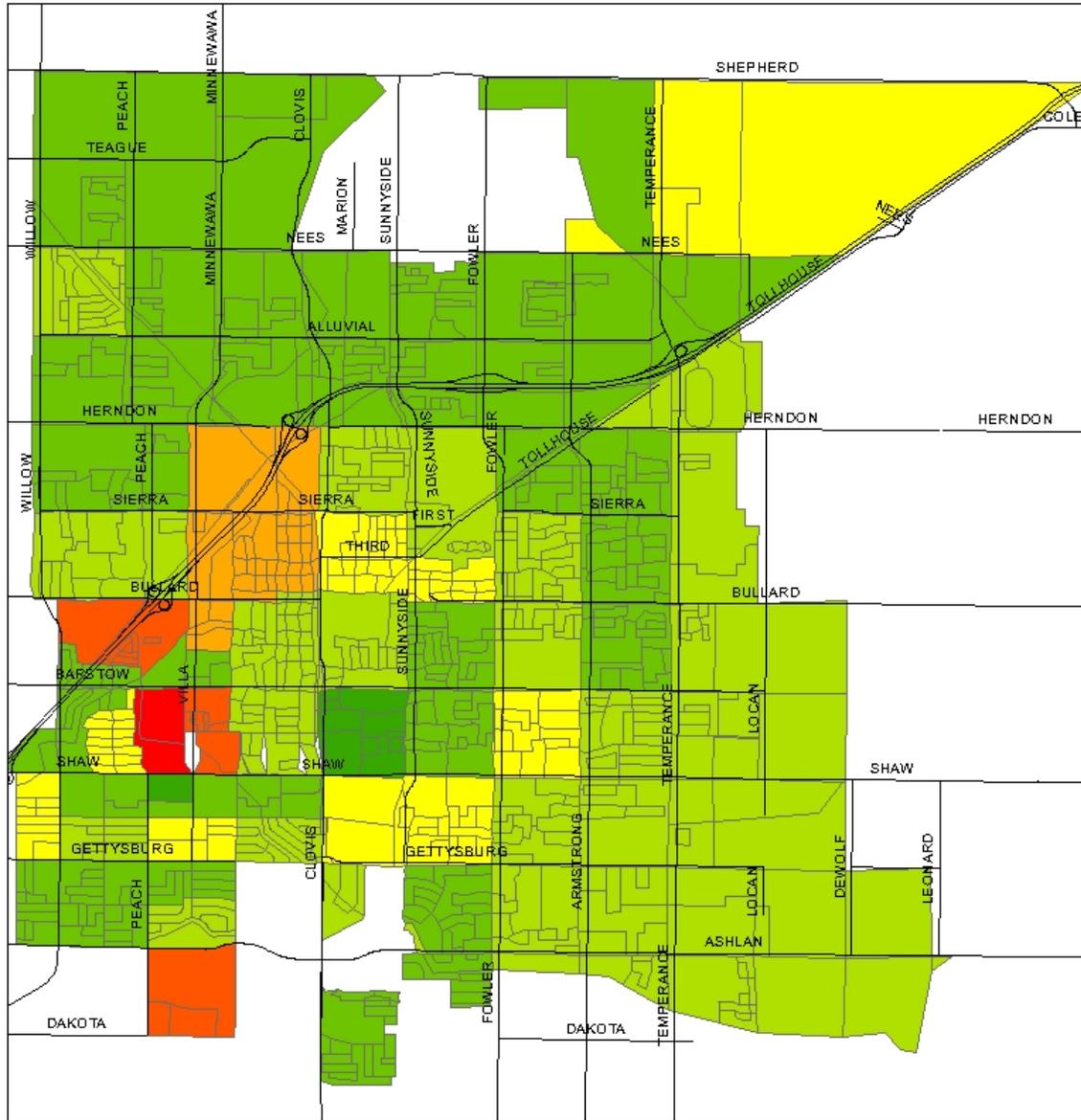
Source: Census 2000



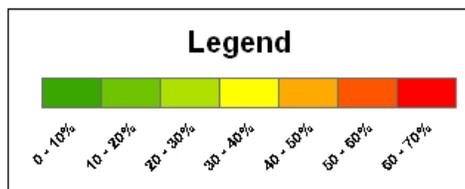
Age Composition

The current median age in Clovis is 32.5. The current median age for the United States is 36.3. Map 5 indicates the concentration of individuals 65 and older in the City of Clovis. The highest concentrations of senior citizens reside in the southwestern portion of Clovis with some Census Blocks indicating 69 percent of the population as being elderly where as the lowest Census Block has an 8 percent elderly population. 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



Source: Census 2000



Number of Households

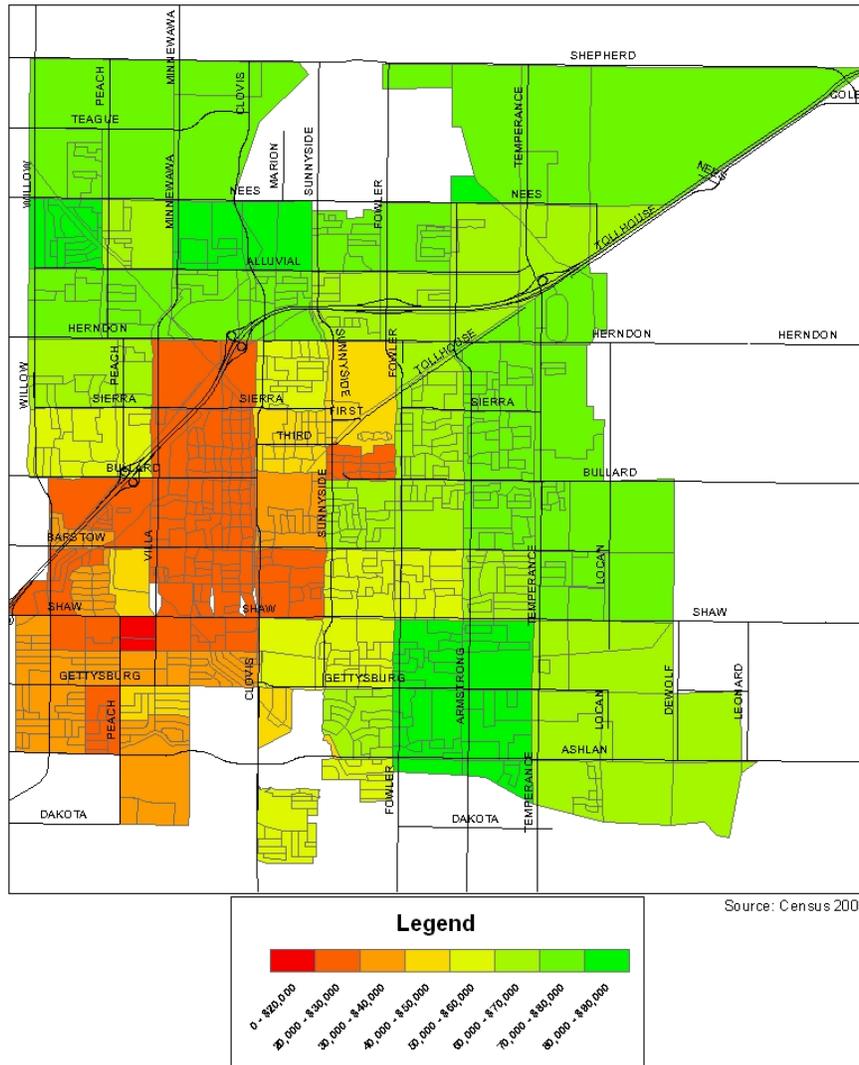
The number of households in Clovis is estimated to have increased from 24,347 to 32,967 According to the 2006-2008 American Communities survey, a 35 percent change between 2000 and 2008. With the high rate of households choosing Clovis in the future housing supplies will be stretched further, making it more challenging for families to acquire safe, decent, and affordable housing.

Household Income

Household incomes increased significantly over the last ten years. In 1990, the average household income was \$36,981; in 2000, according to U.S. census data household incomes were \$42,283. Currently, the median household income is estimated to be \$60,833.² but now is expected to stagnate due to the economic recession

Map 6 indicates median income by Census Block, 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. The highest median income Census Block is \$84,749 with lowest being \$15,875, showing a large disparity in incomes by geographic location in the City.

MAP 6: CITY OF CLOVIS MEDIAN INCOME CONCENTRATION



The disparity of income by race is much closer as shown in Table 1. Minorities do have lower incomes than the white population in Clovis with Native Hawaiian/Pacific Islanders having less than half of the income of many other races and ethnicities. That being said, the Native Hawaiian/Pacific Islanders are a very small population in Clovis with only 108 persons living in Clovis, this could skew the data.

Table 1: Clovis Household Median Income by Race

Race/Ethnicity	Median Income
White	44,039
Asian	41,635
Some Other Race	40,591
Hispanic/Latino	38,189
American Indian	37,679
African American	36,579
Two or More Races	34,632
Native Hawaiian/Pacific Islander	17,031

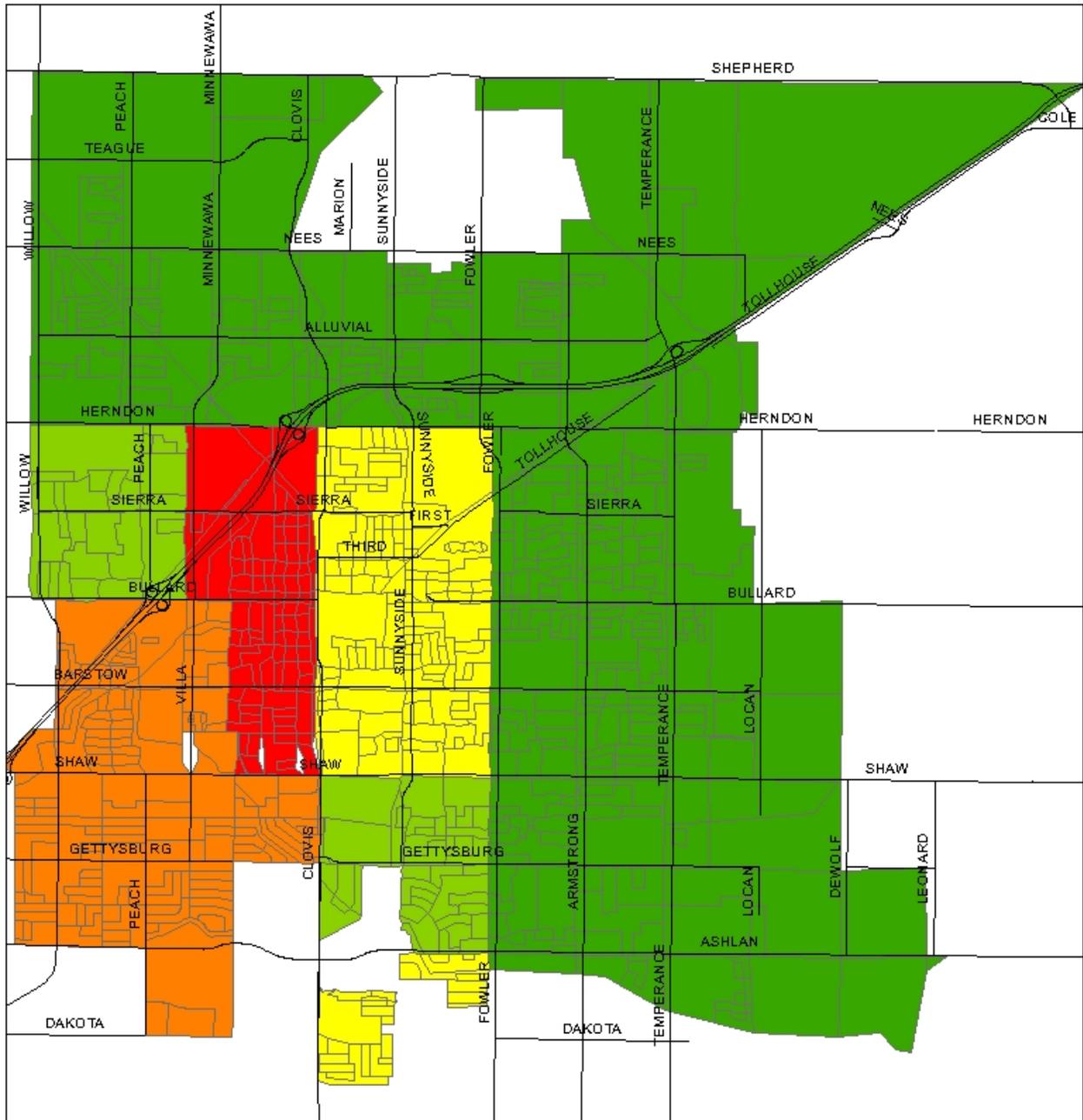
Source: American Communities Survey 2006

Although the City income levels have increased, Map 7 shows that in some Census Blocks up to 23 percent of residents live below the poverty level whereas the City’s poverty rate as a whole is 11 percent. The least amount of poverty in a Census Block is a concentration of 1 percent. Map 7 indicates there are much higher incidences of poverty in the City’s west to southwest area with the highest rates being located in the Central part of the City. 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.

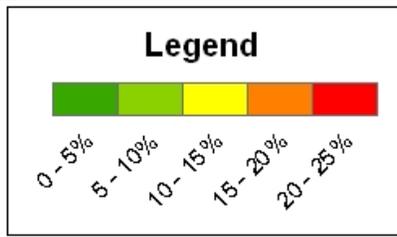
TABLE 2: INCOME DISTRIBUTION IN CLOVIS

Income ₁	% of Total Population ₂	City of Clovis
Very Low/Less than \$27,023	17.20%	5,117
Low/\$27,024-\$43,236	14.21%	4,228
Moderate/\$43,237-\$64,854	17.56%	5,224
Above Moderate/\$64,855 and above	51.03%	15,182
TOTAL HOUSEHOLDS₃	100%	29,752
<small>1 Section 6932 of the California Administrative Code. 2 Percentages based on 2007 Fresno County Regional Housing Needs Allocation Plan. 3 Census Bureau, American Community Survey, 2006.</small>		

MAP 7: CITY OF CLOVIS MEDIAN INCOME CONCENTRATION PERCENTAGE



Source: Census 2000



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 seven years. These rates have been trending upwards due to the economic slowdown but are far less than Fresno County as a whole which for 2009 had a 15.1% unemployment rate.

TABLE 3: CLOVIS UNEMPLOYMENT RATE

Year	Rate
2003	6.2
2004	5.5
2005	4.7
2006	4.2
2007	4.4
2008	5.5
2009	8.1

California Employment Development Department

Unlike a traditional large city there are many scattered employment centers throughout Clovis and the surrounding region. In the 2000 Census it was reported that the average Clovis resident commutes between 20 - 30 minutes each way and only 184 persons out of 30,959 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.	5,300
Pelco	2,100
Clovis Community Hospital	979
City of Clovis	631
Target	430
Alorica	339
Wal-Mart	332
AT & T	260
Savemart	247
Costco	220

Source: City of Clovis 2010-11 Annual Budget

Housing Profile

Data from the U.S. Bureau of Census indicates that the housing stock in the City of Clovis increased by 6,362 units between 1990 and 2000, from 18,888 to 25,250 units. This change represents a 33.7 percent increase. The data summarized in Table 4-5 indicates that the growth of the housing inventory in the City slowed during the 1990s. The period from 1980-1990 showed a 41.5 percent increase in total housing units, with an average increase of 554 units per year, while during the period between 1990-2000, an average increase of 636 units per year was experienced, yielding an increase of 33.7 percent. The actual growth of the housing inventory varies from year to year, and there appears to be an increase since the year 2000. Between 2000 and 2006, the City experienced tremendous growth, with an average

of 1,138 new units constructed per year, which resulted in a 27 percent increase. The housing slowdown decreased this growth substantially with very slight increases through 2009.

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 rose slightly during 1980-1990, and then rose dramatically during 1990-2000. Significant increases can also be seen during 2000 and 2006. As indicated in Table 6, single-family units in Clovis presently comprise 66 percent of the total housing market. A substantial amount of multiple-family growth occurred in the early 1980s and between 2000 and 2006.

TABLE 5: TOTAL HOUSING STOCK

	1980	% Change	1990	2000	% Change	2006	% Change
		1980-1990			1990-2000		2000-2006
California	9,223,120	18.9%	10,966,024	12,214,549	11.4%	13,174,781	7.80%
Fresno County	193,653	21.6%	235,563	270,767	14.9%	299,578	10.60%
City of Clovis	13,345	41.5%	18,888	25,250	33.7%	32,076	27%

Source: 1980, 1990, 2000 Census Data and Census Bureau American Community Survey, 2006

In 2006, multiple-family housing units made up 32.5 percent of the total housing units, with 9,840 units inventoried. There are approximately 63 apartment complexes in the City of Clovis, as well as many smaller two-, three-, and four-unit complexes, which are not identified as apartment "complexes." The number of mobile homes has been relatively small in comparison to single and multiple-family residential structures. In 2006, mobile homes represented only 3.3 percent of the total housing stock.

TABLE 6: TOTAL DWELLING UNITS BY TYPE

Dwelling Type	1980		1990		2000		% Increase 1990-2000	2006		% Increase 2000-2006
	Units	% of Total	Units	% of Total	Units	% of Total		Units	% of Total	
CITY OF CLOVIS										
Single Family	7,267	57.3%	11,341	60.0%	16,802	66.8%	48.2%	21,173	66.0%	26.0%
Multi-Family	4,744	37.4%	6,551	34.7%	7,426	29.5%	13.4%	9,840	30.7%	32.5%
Mobile Homes	667	5.3%	898	4.8%	889	3.5%	0%	1,063	3.3%	19.6%
Total Year Round Dwelling Units	12,678	100%	18,888	100	25,250	100%	33.7%	32,076	100%	27.0%

Sources: 1980, 1990, 2000 Census Data and Census Bureau American Community Survey, 2006

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 TYPE

	1990	2000	% Increase	2006	% Increase
			1990-2000		2000-2006
California					
Total Households	10,381,206	11,502,870	10.80%	12,151,227	5.64%
Owner Occupied	55.60%	56.90%	1.30%	58.45%	1.55%
Renter Occupied	44.40%	43.10%	-1.30%	41.55%	-1.55%
Fresno County					
Total Households	220,933	252,940	14.50%	277,256	9.61%
Owner Occupied	54.30%	56.50%	2.20%	54.95%	-1.55%
Renter Occupied	45.70%	43.50%	-2.20%	45.05%	1.55%
City of Clovis					
Total Households	18,155	24,347	34.10%	29,752	22.20%
Owner Occupied	51.00%	60.40%	9.40%	56.18%	-4.22%
Renter Occupied	49.00%	39.60%	-9.40%	43.82%	4.22%

Source: 1990, 2000 Census Data and Census Bureau American Community Survey, 2006

Households

From 1990 - 2000 and 2000 - 2006, 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 7. The total number of households in the City of Clovis in 2006 was 29,752.

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. In 2008, the average household size increased slightly to 2.86.

Household size is important, as the City uses the average household size to plan for most public improvements and services and to project population. In California, the household size increased from 2.72 persons per household in 1990 to 2.87 persons in 2000; in 2009 this number increased to 2.92. The City of Clovis has maintained its position above the national average household size, which was 2.86 persons in 2008.

TABLE 8: HOUSEHOLD SIZE

Households	1990		2000	
		%		%
CITY OF CLOVIS	18,261		24,347	
1 Person	3,924	21.5	5,420	22.2
2 Person	5,534	30.3	7,038	28.9
3-4 Person	6,758	37.0	8,736	35.9
5+ Person	2,045	11.0	3,153	13.0
AVERAGE HOUSEHOLD SIZE	2.75		2.79	

Source: U.S. Bureau of Census 1990, 2000

Housing Tenure

The number of owner-occupied housing units in the City of Clovis increased between 1990 and 2000 from about 51 percent of the total units to 60.4 percent. However, the number of owner-occupied housing units decreased between 2000 and 2006 to 56 percent. According to the American Communities Survey (2006-2008) renter occupied housing in Clovis has remained at the same proportions of the housing supply as 2000.

TABLE 9: HOUSING TENURE

	1990	2000	% Increase 1990-2000
California			
Total Households	10,381,206	11,502,870	10.8%
Owner Occupied	55.6%	56.9%	1.3%
Renter Occupied	44.4%	43.1%	-1.3%
Fresno County			
Total Households	220,933	252,940	14.5%
Owner Occupied	54.3%	56.5%	2.2%
Renter Occupied	45.7%	43.5%	-2.2%
City of Clovis			
Total Households	18,155	24,347	34.1%
Owner Occupied	51.0%	60.4%	9.4%
Renter Occupied	49.0%	39.6%	-9.4%

Source: U.S. Bureau of Census 1990, 2000 for the City, County, and State

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 increased .3 percent from 3.3 percent in 1990 to 3.6 percent in 2000. There was a significant increase in the vacancy rate of 3.6 percent from 2000 to

2008. This is most likely attributable to an oversupply of housing units due to a downturn in the real estate market. Approximately 2,159 housing units were vacant in 2008.

TABLE 10: CITY OF CLOVIS VACANCY RATE

1990	2000	% Change 1990-2000	2008	% Change 2000-2008
3.30%	3.60%	0.30%	6.5%	2.9%

Source: 1990, 2000 Census Data and Census Bureau American Community Survey, 2006-08

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 2000 Census, 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 of their gross income on housing. Approximately 27.51 percent of owners and 46.07 percent of renter households spent 30 percent or more of household income on housing. The number of owner households overpaying for housing is not as great a concern as overpaying renter households. Some owner households choose to allocate a higher percentage of their monthly income on housing costs due to an investment or tax advantage.

Table 11 shows a disproportionate number of households (46.07 percent) 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. The Census does not cross-reference overpayment data with the categories of very low and low income as defined on Table 4-11, but comparisons can be made on a general level. For example, 32.64 percent of renters earning up to \$19,999 pay more than 30 percent of their incomes on housing, which constitutes 3,101 households. In the low range, \$20,000 to \$34,999, 1,138 households pay more than 30 percent of their incomes for housing at 11.98 percent of the renter population. This reflects the need for affordable rental housing particularly for very low- and low-income households.

Regarding homeowners, Table 11 indicates that 26.91 percent of homeowners earning less than \$10,000 to \$74,999, pay 30 percent or more of their monthly income for mortgages. These income groups, which approximately correspond to the very low, low income, and moderate categories, appear to be the most highly impacted homeowner income groups in terms of overpayment. This reflects the need for affordable very low to moderate-income homes in the City.

TABLE 11: CITY OF CLOVIS HOUSING AFFORDABILITY BY INCOME GROUP

Income	0-19%		20-29%		30% or more		Total	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
OWNER HOUSEHOLDS								
Less than \$10,000	0	0.00%	3	0.02%	305	2.30%	402	2.32%
\$10,000 - \$19,999	127	0.96%	105	0.79%	526	3.96%	758	5.71%
\$20,000 - \$34,999	437	3.29%	297	2.24%	927	6.98%	1,661	12.51%
\$35,000 - \$49,999	484	3.64%	696	5.24%	1,041	7.84%	2,221	16.72%
\$50,000 - \$74,999	1,078	8.12%	1,719	12.94%	774	5.83%	3,571	26.89%
\$75,000 - \$99,000	1,536	11.57%	840	6.32%	67	0.50%	2,443	18.39%
\$100,000 - \$149,999	1,330	10.01%	386	2.91%	14	0.11%	1,730	13.03%
\$150,000 or more	485	3.65%	10	0.08%	0	0.00%	495	3.73%
Sub Total	5,477	41.24%	4,056	30.54%	3,654	27.51%	13,281	99.29%
RENTER HOUSEHOLDS								
Less than \$10,000	0	0.00%	11	0.12%	1,143	12.03%	1,363	12.15%
\$10,000 - \$19,999	27	0.28%	99	1.04%	1,958	20.61%	2,116	21.94%
\$20,000 - \$34,999	305	3.21%	1,381	14.54%	1,138	11.98%	2,868	29.73%
\$35,000 - \$49,999	880	9.26%	487	5.13%	121	1.27%	1,497	15.66%
\$50,000 - \$74,999	855	9.00%	214	2.25%	17	0.18%	1,135	11.43%
\$75,000 - \$99,000	380	4.00%	8	0.08%	0	0.00%	397	4.08%
\$100,000 or more	124	1.31%	0	0.00%	0	0.00%	124	1.31%
Sub Total	2,571	27.06%	2,200	23.16%	4,377	46.07%	9,500	96.30%
Total	8,048		6,256		8,031		22,781	

Source: 2000 Census

Calculations Include households not computed; therefore, the totals do not equal 100%

Table 12 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 6.5% interest rate with a 5% down payment. Neither rent nor purchase price account for utility costs.

TABLE 12: CLOVIS AFFORDABLE RENT/PURCHASE PRICE BY ANNUAL INCOME

Type	Annual Income	Affordable Rent or Mortgage Payment ¹	Maximum Affordable Purchase Price ²
HOUSEHOLD INCOME			
Very Low	\$0 - \$27,023	\$676	\$108,500
Low	\$27,024 - \$43,236	\$1,081	\$174,000
Moderate	\$43,237 - \$64,854	\$1,621	\$261,000
Above Moderate	\$64,854+	\$1,621+	\$261,000+

1. Based on 30 percent of income.

2. Based on conventional 30 year loan at a 6.5% interest rate with a 5% down payment.

As a measure of affordability in Clovis, the above available expenditures, as shown on Table 12, should be compared with rental and purchase prices in the City. As shown in Table 13, average market rents for multiple family units are \$547 for studio; \$665 for one bedroom; \$742 for two bedrooms; \$1,074 for three bedroom apartments, according to the updated 2007 City survey completed for the Housing Element Update. Overall, these rents do not include utilities, which may impose additional costs to the

renter of between \$50 and \$100 per month; depending on which utilities the renter is responsible for paying. Renters may be required to cover water, sewer, and trash pickup costs in addition to the usual electric, gas, and phone. The addition of these costs may lead to a household overpaying on unit that would otherwise be affordable.

As reported by the American Community Survey 2006-08, 39.9 percent of the housing units in Clovis are renter occupied and the residents have experienced overall rent increases. A very low-income household with an income of \$27,023 or less can afford a housing payment/rent of \$676 per month.

TABLE 13: CLOVIS RENTAL UNIT INVENTORY

Type of Unit	Number of Units in Survey	Rental Range	Average Rent
Apartment Units			
Studio	147	\$515-595	\$547
One Bedroom/One Bath	2,195	\$410-955	\$665
Two Bedroom/One Bath	2,452	\$522-1150	\$742
Two Bedroom/Two Bath	612	\$735-1200	\$915
Three Bedroom/Two Bath	259	\$715-1350	\$1,074
Four Bedroom/Two Bath	16	\$1,595	\$1,595
Total	5,681		
Total Handicap Accessible Units = 374			

Source: City of Clovis General Plan – Housing Element

It is possible that households comprised of single individuals may share a one- or two-bedroom unit, as roommates, particularly in the case of college students, thereby splitting the cost of the rental unit. In this circumstance, two unrelated very low-income individuals could afford to rent a two-bedroom apartment or rental house, as well as a few three-bedroom units available at the lower end of the rental range. Approximately 6,958 households, or 23.4 percent of all households in the City, consist of a single individual per unit. There are 9,190 nonfamily households in the City, comprising 30.9 percent of the population.

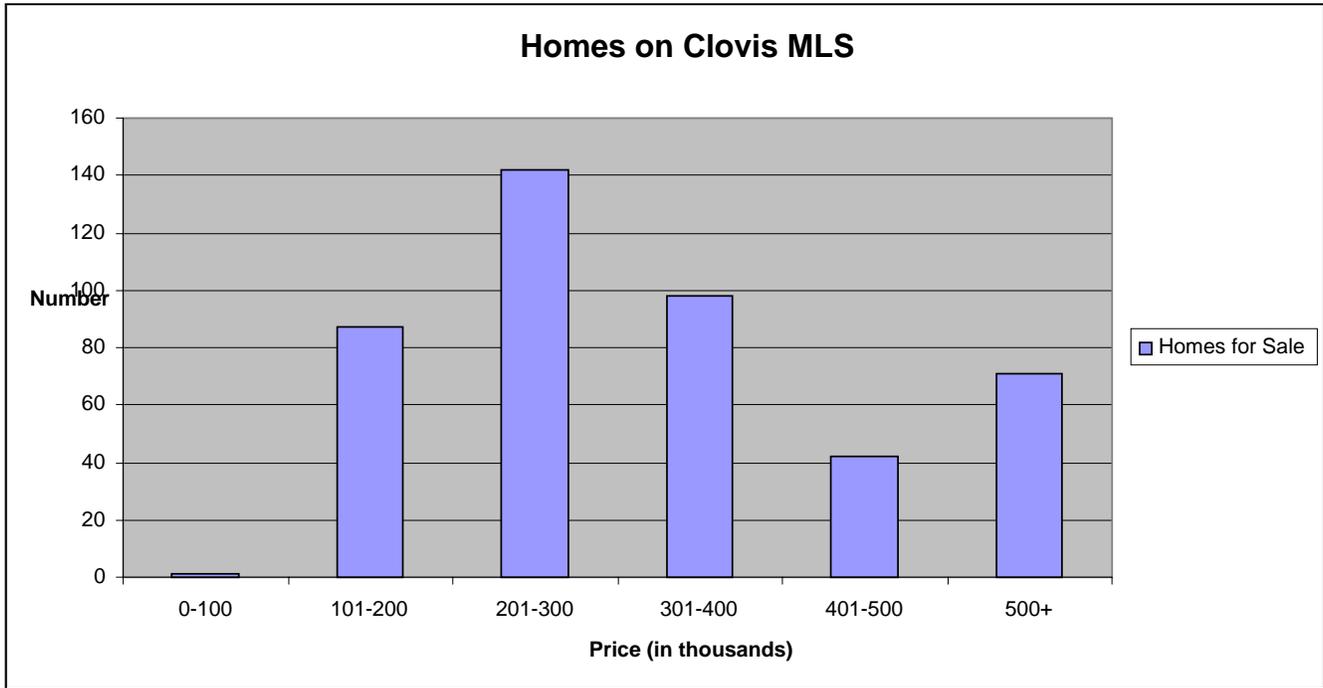
In May of 2010, the average resale asking home price was \$274,900, as determined by the Multiple Listing Service. The median housing sales price was \$235,000. Based on this information, it is apparent that generally only families with above moderate incomes can afford to buy a house. With median household earnings of \$54,045 within Clovis, a household could "theoretically" afford a monthly housing payment of \$1,351. This is considerably less than the approximate \$1,700 monthly payment required for the median priced existing resale. The payment amounts reflect a 6 percent fixed interest rate and 5 percent down payment. The payment amounts include estimated private mortgage insurance, property taxes, and insurance.

According to the distribution of resale house prices, one home is affordable to very-low households and approximately thirty are affordable to low income households. Approximately 70 percent of the resale homes may not be affordable to any household income category except for above moderate.

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.

CHART 5: CLOVIS RENTAL UNIT INVENTORY



Source: Multiple Listing Service, June, 2010

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. While age and inadequate maintenance certainly contribute to housing quality problems, overcrowding also plays a role in the deteriorating condition of the housing stock in certain older areas of the City.

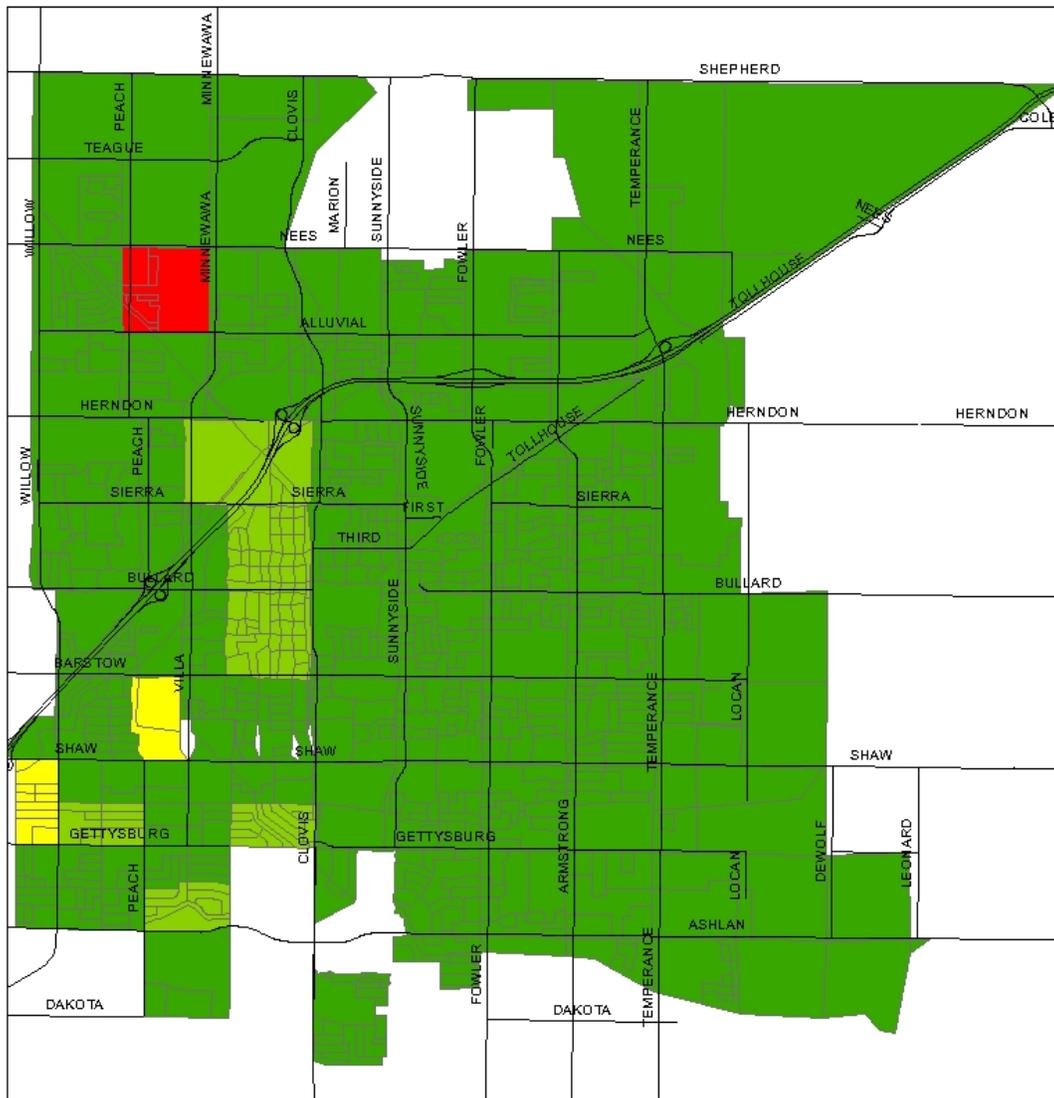
Beginning in July 2007, the City of Clovis Planning Division conducted a housing condition windshield survey of 24,297 single family homes in the city limits. The survey also included a rating of property conditions. Each residence was rated on landscape, presence of trash and rubbish, inoperable vehicles, and fences in need of repair. This survey illustrated that in some neighborhoods, which were commonly thought to need housing rehabilitation, the problem is actually related to property maintenance, not housing condition.

Many of the houses that scored low during the 2002 survey were due to the condition of their roofs, and otherwise exhibited little defects or substandard conditions. With the current survey many of the homes

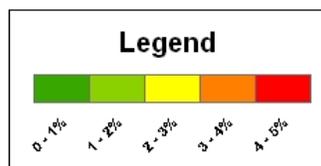
that scored low during 2002 obtained higher scores. Much of the scoring differences can be attributed to the homes having been re-roofed or otherwise repaired.

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 10 years to purchase and tear down or provide loans to replace dilapidated housing. The 2000 Census, as indicated in Map 8, assessed substandard units.

MAP 8: CITY OF CLOVIS PERCENT OF SUBSTANDARD UNITS



Source: Census 2000



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. 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 14: CLOVIS OVERCROWDING

	1980	1990	2000	2008
Total Occupied Housing Units	12,437	18,888	24,240	30,808
Overcrowded	416	1,033	1,674	652
Incidence of Overcrowding	3.30%	5.50%	6.90%	2.12%

¹ Housing Units that exceed 1.0 or more persons per room.

Source: U. S Bureau of Census. 1980, 1990, 2000. American Community Survey 2006-08

Table 14 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 2006-08, 2.12 percent of the units were overcrowded. The 4.78 percent decrease in overcrowding between 2000 and 2008 may be due to the significant increase in available housing units and relatively low interest rates, which promoted homeownership until 2006. Recently however, based on anecdotal evidence, families are moving back in together due to the housing and economic crisis. It is expected overcrowding will return to 2000 levels in the future.

Special Need 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 2000 census data, 6,406 City residents, or 9.4 percent of the total population, were 65 years of age or older in 1990. In 2006, the American Community Survey data collected by the Bureau of Census reported Clovis' population over 65 at 7,535 residents, or 9.1 percent of the City total. Clovis' population over 75 is estimated at 3,668 residents, or 4.4 percent of the City total.

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/handicapped.

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
Creekside Apartments, 4751 E. Gettysburg Avenue
Dry Creek Meadows, 740 N. Villa Avenue
Eastview Apartments, 647 W. Barstow 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
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
Hotchkiss Terrace, 51 Barstow 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 (pO₂) 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.

Table 4-15 lists the number of persons in the City of Clovis who reported having a disability. 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.

Persons having a disability represent 16.7 percent of the City's population over the age of 16. Persons with a disability include a large number that are 65 years of age and older, representing 4,043 persons or 6.4 percent of the population over 16.

TABLE 15: CLOVIS PERSONS REPORTING A DISABILITY

Persons 16-64	Percent	Persons 65+	Percent
6,510	10.3	4,043	6.4

1. Population base used to calculate percentage is civilian noninstitutionalized persons age 16 and over, at a total base of 63,458 population.

Source: U.S. Census Bureau, American Community Survey, 2006 (Most Recent Available)

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 five or more persons. Most recent data provided by the U.S. Census Bureau, 2006 American Community Survey reported 2,575 households in the City of Clovis with five or more persons, as indicated in Table 4-16. Large families are indicative not only of households that require larger dwellings, with more bedrooms to meet their housing needs, but are also reflective of a large number that live below the poverty level. Large family households increased from 2,037 households, at 11.2 percent of the total households in 1990 to 3,153 households, at 13 percent of households in 2000, but decreased to 2,575 households, at 8.6 percent of total households in 2006. Difficulties in securing housing large enough to accommodate all members of a household are heightened for renters, because rental units are typically smaller than single-family units.

Table 15 shows that there were 582 large households occupying rental units in 2006. This number represented 4.5 percent of all renter households. The number of three-bedroom units was documented as part of the rental housing survey. There are 259 three-bedroom apartments in the City. These units are not sufficient to accommodate the percentage of large household renters. However, there are unknown number of 3 bedroom and four bedroom single-family rental houses in the City. Although there are resources available to meet the needs of large families, there may not be sufficient numbers of units to accommodate the need, as the available units may be out of the affordable price range for a number of households, and a number of larger bedroom units may be rented by smaller families or households who are able to afford the market rent. This conclusion is supported by the high demand for two and three bedroom rental units expressed by discussions with apartment managers

TABLE 16: CLOVIS LARGE HOUSEHOLDS BY TENURE

Number of Persons in Household	Owner Occupied	Renter Occupied	Total
Five	1,505	285	1,790
Six	324	307	631
Seven or More	154	0	154
TOTAL	1,983	582	2,575

Source: U.S. Census Bureau, American Community Survey, 2006 (Most Recent Available)

Southeast Asian Population

One ethnic group that may pose special housing concerns in this area is the Southeast Asian population. While historical information indicates a presence of Asian ethnic groups (Japanese and Chinese) in Clovis prior to 1920, the actual percentage of the Asian population remained fairly low in contrast to other ethnic groups. Starting in 1980 the population of Southeast Asians increased dramatically in the Fresno/Clovis Metropolitan Area. Most of the recent groups of Southeast Asians arriving in the metro area have been Hmong, Laotian, and Cambodian. Interviews with leaders in the Southeast Asian community have indicated that many Southeast Asians have located in the Fresno-Clovis Metropolitan Area because they already have family members living in this area or because of the weather and small plot farming opportunities similar to their previous locations in Southeast Asia.

The recent Southeast Asian immigrants pose some special housing concerns. Many Southeast Asians live in large extended families including parents, children, grandparents, and associated relatives. Providing housing for first and possibly second generation Southeast Asians requires large housing units that are typically associated with low and moderate income complexes, if the number of persons per room is complied with in order to eliminate overcrowding. Because of the large extended families, housing needs to be available that provides for larger eating areas and greater numbers of bedrooms.

Most of the Southeast Asians do not live on or near the small acreage farms they work. Generally, Southeast Asians tend to congregate in older single-family housing and multiple family units. The Bureau of Census reported in 2000 that 2,294 Southeast Asians populated the City of Clovis.

Planning for Southeast Asian housing needs is complicated because of the changing roles the Southeast Asians have in the community. Interviews with several Southeast Asian leaders have indicated that small plot farming in large family units is likely to be only a transitional form of employment. Accordingly, the present housing need for extremely large dwellings may not be as important in the future. A more flexible form of housing developed in a multiple family format may provide the larger units initially needed, with the possibility of later conversion, as concepts surrounding the extended family change with constant exposure to western culture.

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 2006-08 shows that females head 3,951 households, which represents 12.8 percent of the total households. Of this total, 2,463 are households with children. 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.

Table 17 indicates the numbers and percentages, as of 2008, of those female-headed households with related children as determined by the Bureau of Census American Community Survey. 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 2008, the percent of female-headed households in Clovis below the poverty level represented 21.9 percent. When a female headed household has children under the age of 18 the percentage is 27.4 percent and climbs to 57.6 percent when the children are under the age of five.

TABLE 17: CLOVIS FEMALE HEAD OF HOUSEHOLDS 2008

Household Type	Total	Percent of Total Households ¹
Female-Headed Households (no children under 18)	1,488	4.8
Female-Headed Households (with children under 18)	2,463	8.0
Total Households	3,951	12.8

1. Total number of households in the City is 30,808 in the Survey. Percent of total households calculated on this figure.

Source: U.S Census Bureau, American Community Survey, 2006-08

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 2006, workers in farming or related industries in Clovis are approximately 1 percent of all workers. This ranks the City of Clovis fifteenth of all cities in Fresno County for percent of farm workers in the work force. Based on the analysis of farm labor and the sharply diminishing amount of farmland in the City of Clovis, Clovis sphere of influence, and surrounding rural areas in this part of Fresno County, the need for farm worker housing in this area is diminishing.

Previously, farm workers (both permanent and seasonal) have been housed in the rural areas on the farms or in dispersed locations throughout Clovis. One exception is the Stanford Addition area. The Stanford Addition area located east of Sunnyside Avenue, south of Tollhouse Road, north of Bullard Avenue and west of Fowler Avenue has traditionally contained smaller lots and homes, providing affordable housing. Historically, many of the smaller dwellings in the Stanford Addition have been available for housing farm workers employed in the area.

In Fresno County in general, more persons are permanently and seasonally employed in agriculture than in any other county in the state. Agriculture workers represent 8 percent of the County's workforce as shown in the Distribution of Employment by Industrial Sector Exhibit located in the community profile section. The State of California Employment Development Department reported that in 2000 a total of 55,600 persons were directly employed in agriculture in Fresno County; however, by 2006 that number had decreased to 46,800. The American Community Survey of 2006 reported that 413 people working in agricultural related industries resided in the City of Clovis, a proportionately smaller number to the total agricultural workers in Fresno County.

The Migrant and Seasonal Farm Worker Enumeration Profiles Final Study for California dated September, 2000 indicated that in Fresno County there are an estimated 113,741 migrant and seasonal farm workers. Of this number, 52,662 are migrant farm workers and 61,079 are seasonal farm workers. The study further estimates there are 19,353 non-farm workers in migrant households and 69,309 non-farm workers in seasonal households, for a total figure of 202,404 migrant and seasonal farm workers and their families in Fresno County.

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:

1. The Marjaree Mason Center
2. Turning Point of Central California
3. The Fresno Rescue Mission
4. Catholic Charities
5. The Poverello House
6. Valley Teen Ranch
7. Sanctuary Youth Shelter
8. Naomi's House
9. Salvation Army Rehabilitation Center
10. Maroa Home
11. Spirit of Women
12. The Housing Authority of Fresno City and County – Plaza Emergency Housing

Most of the above shelters offer varying types of support services to their clients.

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, 2009, in accordance with HUD requirements with the FMCOC, sixteen homeless individuals were located and surveyed in Clovis.

In addition, an interview with the City's Community Services Manager indicated an estimate of 8-10 homeless persons residing in Clovis. This number appears to be seasonal as many homeless persons seek the services of shelters in Fresno during the cold and very hot months of the year. Due to regional

growth and an aging population with little financial resources , the Community Services Manager estimates seeing more homeless as time progresses.

The Clovis Police Department was contacted as well to gain an additional viewpoint on the homeless population in Clovis. The homeless population the Police Department comes into contact with was described as a transient population of 10-20 individuals largely determined by the weather. It was also said that growth in this population is expected as the region's population grows and economic indicators point to a decline.

The Salvation Army of Clovis provides services to individuals and families in need in Clovis. In a conversation with the staff at the Salvation Army, 10 single homeless male individuals and very few families during the warmer months. The Salvation Army foresees this number continuing in the future.

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 need through 2013. 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. Table 18 shows the projected number of households in 2006 to 2013 by income group, as forecast by the RHNA as developed for the Housing Element Update.

TABLE 18: CLOVIS INCOME DISTRIBUTION 2006 and 2013 PROJECTION

Income ¹	2006		2013	
	% of Total Population ²	Households ³	% of Total Population	Households
Very Low/\$0 - \$27,023	17.20%	5,385	18.33%	8,265
Low/\$27,024 - \$43,236	14.21%	4,447	14.47%	6,525
Moderate/\$43,237 - \$64,854	17.56%	5,498	17.58%	7,928
Above Moderate/\$65,854+	51.03%	15,972	49.62%	22,372
Total Households³	100%	31,301	100%	45,090

1. Calculated based on Section 6932 of the California Administrative Code.

2. Percentages of Household Income based on RHNA.

3. Household numbers based on RHNA.

Source: RHNA

The RHNA calculates the projected new construction need necessary to accommodate the anticipated population through 2013. 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 19.

A projected need of 15,384 new housing units is assigned to Clovis in the RHNA, based upon current conditions. Table 19 shows that the greatest housing construction need through 2013 will be generated by very low and above moderate-income households. The future need as determined by RHNA shows 49.62 percent of the households in 2013 as above moderate income. In recent years housing prices have increased, making it difficult for households in all income categories to find affordable housing except for those in the above moderate category.

TABLE 19: CLOVIS BASIC CONSTRUCTION NEEDS AND NEW HOUSEHOLDS

Income Group	Households 2007 - 2013		Adjusted Housing Units
	Number Increase	Percent Increase	
Very Low	2,880	20.89%	3,275
Low	2,079	15.08%	2,354
Moderate	2,430	17.63%	2,681
Above Moderate	6,400	46.41%	7,073
Total	13,788	100%	15,384

Source: RHNA as revised in cooperation with the City of Clovis

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 and July 2010 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 149 listings in the Fresno Bee and multiple on-line listings such as 26 on Rent.com and 89 craigslist.com. A total of 264 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 the 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 intuitions 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 2008. A total of 2,229 records were available for review and are analyzed in this section in great detail. It is worth noting that the housing market and lending environment were under historic stress for the period the HMDA data is available.

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 2,229 applications had been submitted in the 2008 reporting period. In the 2006 reporting period, 4,604 applications had been submitted. The significant drop-off in lending is due to the housing crisis that began in this area in 2007. Table 20 shows the number of applications that were financed and the status for loan applications that were not approved.

TABLE 20: HOME PURCHASE LOANS IN CLOVIS

Result	FHA/FSA/RHS/VA	Conventional	Total	Percentage
Loans Originated (funded)	559	796	1355	60.79%
Approved, Not Accepted	41	168	209	9.38%
App Denied	89	296	385	17.27%
App Withdrawn	54	186	240	10.77%
File Closed for Incompleteness	6	34	40	1.79%
Total Applications	749	1480	2229	100.00%

Source: 2008 HMDA Data

Loan Type

The financed loans and denied loans are broken out by source of capital in Table 20. The bulk of the loans were underwritten by conventional banks but government backed mortgage programs made up a significant portion of the lending activity. This is in stark contrast to 2006 HMDA data that shows only 11 loan applications out of 4,604 utilized governmental mortgage programs.

Race and Ethnicity

Unfortunately data is not available at the census tract level for outcomes by race and ethnicity, rather it is tabulated county-wide. Fresno County, in general, acts as one housing market so the data should be indicative of activities in Clovis. Table 21 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.

TABLE 21: APPLICATIONS RECEIVED AND RESULTS BY RACE & ETHNICITY

Category	Received		Originated		Approved/Not Accepted		Applications Denied		Withdrawn		Incomplete	
	#	%	#	%	#	%	#	%	#	%	#	%
Race												
American Indian/Alaska Native	134	1%	76	57%	7	5%	30	22%	21	16%	2	1%
Asian	1086	10%	587	54%	110	10%	236	22%	115	11%	38	3%
African American or Black	235	2%	108	46%	32	14%	57	24%	29	12%	7	3%
Nat Hawaiian/Pacific Islander	57	1%	33	58%	7	12%	11	19%	11	19%	5	9%
White	7954	74%	4991	63%	780	10%	1173	15%	703	9%	207	3%
2 or more Minority Races	4	0%	3	75%	0	0%	0	0%	1	25%	0	0%
Joint (white/minority race)	203	2%	131	65%	16	8%	29	14%	24	12%	1	0%
Race Not Available	1063	10%	531	50%	141	13%	205	19%	151	14%	43	4%
	10,736	100%	6,460	60%	1,093	10%	1,741	16%	1,055	10%	303	3%
Ethnicity												
Hispanic or Latino	3014	28%	1645	55%	323	11%	498	17%	296	10%	93	3%
Not Hispanic or Latino	6411	60%	4065	63%	615	10%	763	12%	585	9%	160	2%
Joint (Hispanic or Latino/Not)	401	4%	274	68%	44	11%	39	10%	32	8%	9	2%
Ethnicity Not Available	910	8%	486	53%	113	12%	150	16%	122	13%	33	4%
	10,736	100%	6,470	60%	1,095	10%	1,450	14%	1,035	10%	295	3%
Summary												
White/Non-Hispanic	4788	49%	3202	67%	442	9%	493	10%	338	7%	108	2%
Minorities, Incl. Hispanic	4944	51%	2736	55%	1850	37%	785	16%	1479	30%	333	7%
	9,732	100%	5,938	61%	2,292	24%	1,278	13%	1,817	19%	441	5%

Lending Outcomes

Table 21 shows lending outcomes by race. Sixty percent of all primary residence loan applications are approved and financed. Sixteen percent of loan applications were denied with a disproportion occurring for American Indian/Alaska Native, Asian, and African American races albeit less than 8% difference. Additionally minorities as a group were denied financing 3% more than White/non-Hispanic households. Table 22 shows lending denial reason by race, ethnicity and income. The most often denial reason for all groups is debt to income ratio with 24% of applicants being denied. This is indicative of the current economic slump and the high consumer debt loads households are carrying. Both minorities and ethnic groups are rejected more often than Whites due to the debt-to income denial reason by 7% on average. In addition American and Alaska Natives are rejected 7% more due to lack of cash on hand but this may be skewed due to the small number of applicants from this group.

TABLE 22: REASONS FOR DENIAL BY RACE, ETHNICITY, and INCOME

Race	Debt to Income Ratio		Emp. History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Application Incomplete		Mort Ins Denied		Other		Total	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
American/Alaska Native	9	20%	2	5%	5	11%	6	14%	6	14%	6	14%	2	5%	0	0%	8	18%	44	100%
Asian	109	33%	13	4%	32	10%	27	8%	22	7%	40	12%	21	6%	5	2%	62	19%	331	100%
African American or Black	15	18%	10	12%	12	14%	6	7%	6	7%	8	9%	5	6%		0%	23	27%	85	100%
Nat Hawaiian/Pacific Isl.	2	14%	1	7%	1	7%	3	21%	1	7%	3	21%	0	0%		0%	3	21%	14	100%
White	429	25%	41	2%	255	15%	210	12%	116	7%	148	9%	104	6%	17	1%	387	23%	1707	100%
2 or more Minority Races																				
Joint (white/minority race)	11	33%	2	6%	2	6%	4	12%	3	9%	1	3%	4	12%		0%	6	18%	33	100%
Race Not Available	49	21%	3	1%	46	20%	28	12%	7	3%	20	9%	11	5%	3	1.32%	61	27%	228	100%
	624	24%	72	5%	353	12%	284	12%	161	8%	226	11%	147	6%	25	0.55%	550	22%	2442	100%
Ethnicity																				
Hispanic or Latino	266	28%	17	2%	162	17%	101	11%	69	7%	78	8%	48	5%		0%	201	21%	942	100%
Not Hispanic or Latino	309	25%	37	3%	146	12%	154	13%	81	7%	130	11%	85	7%	0	0%	288	23%	1230	100%
Joint (Hispanic or Latino)	16	30%	4	8%	9	17%	5	9%	3	6%	3	6%	3	6%		0%	10	19%	53	100%
Ethnicity Not Available	33	22%	4	3%	36	24%	6	4%	6	4%	15	10%	11	7%	0	0%	41	27%	152	100%
	624	26%	62	4%	353	17%	266	9%	159	6%	226	9%	147	6%	0	0%	540	23%	2377	100%
Race/Ethnicity Summary																				
White/Non-Hispanic	168	22%	22	3%	97	13%	111	14%	48	6%	71	9%	57	7%	0	0%	193	25%	767	100%
Others, Incl. Hispanic	413	29%	37	3%	216	15%	145	10%	104	7%	135	9%	79	6%	0	0%	300	21%	1429	100%
	581	25%	59	3%	313	14%	256	12%	152	7%	206	9%	136	6%	0	0%	493	23%	2196	100%
Income																				
Less Than 50%	65	45%	14	10%	16	11%	7	5%	9	6%	15	10%	1	1%		0%	18	12%	145	100%
50-79%	134	32%	15	4%	76	18%	44	10%	25	6%	26	6%	26	6%		0%	76	18%	422	100%
80-99%	101	30%	10	3%	62	18%	30	9%	35	10%	20	6%	15	4%		0%	68	20%	341	100%
100-119%	90	30%	8	3%	46	15%	25	8%	26	9%	18	6%	22	7%		0%	66	22%	301	100%
120% or more	223	19%	15	1%	148	13%	175	15%	63	5%	145	13%	83	7%		0%	307	26%	1159	100%
Income Not Avail.	11	48%	0	0%	5	22%	0	0%	0	0%	2	9%	0	0%		0%	5	22%	23	100%
	624	34%	62	3%	353	16%	281	8%	158	6%	226	8%	147	4%	0	0%	540	20%	2391	100%

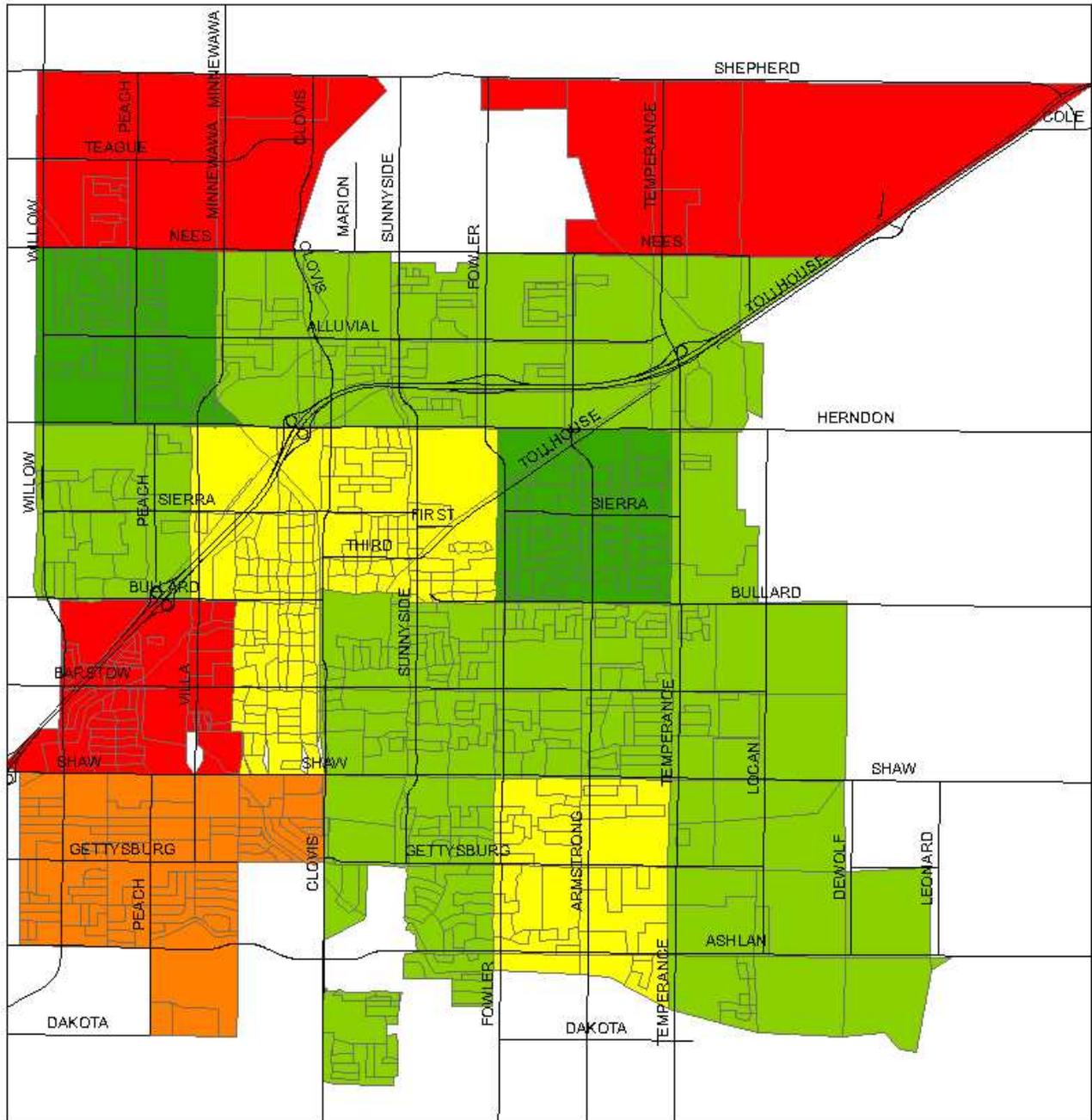
Mortgage Lending by Area

In addition to analyzing lending outcomes for individual applicant characteristics, it is important to analyze lending activity by census tracts. Table 23 shows a summary of lending activity by census tract. Map 9 shows the 2006 census tracts with a concentration of low-income families also had the highest denial and failure rates in the HMDA data. The HMDA data from 2008, displayed on Map 10 shows an increased level of denials across the City with more affluent areas experiencing higher denial rates. Inversely the 2008 data shows some improvement in the lower income neighborhoods. This is most likely due to the size of mortgage required to purchase a home in the more affluent areas versus a home in the lower income census tracts. In reasons for denial, debt-to-income ratio was the leading reason for denial. The lower income neighborhoods, with some exception, were average for denial rates showing that the properties were affordably priced and households could obtain financing.

TABLE 23: LOANS STATUS BY CLOVIS CENSUS TRACT

Census Tract	Originated		Approved/Not Accepted		Denied		Withdrawn		Incomplete	
	#	%	#	%	#	%	#	%	#	%
31.01	62	57.41%	12	11.11%	22	20.37%	9	8.33%	3	2.78%
31.02	29	59.18%	2	4%	11	22%	5	10%	2	4.08%
55.11	275	49.28%	53	10%	147	26%	71	13%	12	2.15%
55.12	67	71.28%	9	10%	10	11%	5	5%	3	3.19%
55.13	27	62.79%	7	16%	5	12%	4	9%	-	0.00%
55.14	37	80.43%	1	2%	3	7%	3	7%	2	4.35%
55.15	7	50.00%	4	29%	2	14%	1	7%	-	0.00%
56.02	24	55.81%	5	12%	8	19%	5	12%	1	2.33%
56.04	30	52.63%	4	7%	15	26%	8	14%	-	0.00%
56.06	39	66.10%	7	12%	6	10%	6	10%	1	1.69%
57.01	33	63.46%	3	6%	10	19%	6	12%	-	0.00%
57.02	107	75.35%	8	6%	14	10%	12	8%	1	0.70%
57.03	48	75.00%	7	11%	8	13%	1	2%	-	0.00%
57.04	33	51.56%	11	17%	9	14%	7	11%	4	6.25%
58.01	48	64.86%	7	9%	10	14%	9	12%	-	0.00%
58.02	42	58.33%	9	13%	11	15%	9	13%	1	1.39%
58.03	251	66.23%	26	7%	53	14%	42	11%	7	1.85%
59.03	247	64.16%	42	11%	50	13%	40	10%	6	1.56%
Clovis	1,406	61%	217	9%	394	17%	243	11%	43	2%

MAP 10: 2008 CLOVIS LOAN DENIAL CONCENTRATION



Source: HMDA Data 2008



HMDA Data Analysis Summary

The analysis of the HMDA data does show disparities in race and ethnicity in regards to obtaining financing to purchase a home. When compared to the incomes of these groups it appears they are not being discriminated against by the lending institutions but rather are not able to obtain financing due to lower incomes.

This is also evident in the leading reason for denial is debt-to-income ratios (26%) not being within required parameters. This is especially evident on Table 22 that shows reason for denial by income category with over 45% of applicants denied due to debt-to-income ratio earned below 50% of the median income while denied applicants earning over 120% of median were denied for this reason 19% of the time.

Geographically loan denials are higher in lower-income neighborhoods but they have improved since an analysis of 2006 HMDA was conducted. Interestingly denial rates were higher in newer, more affluent census tracts at the north end of the City. Paired again with the most often reason for denial being debt-to-income ratios it appears affordability and related levels of income are the number one reason for denial. In addition, the change reflects the impact the recession has had on the home lending market in Clovis. More affordable properties in lower-income areas have had greater success of being financed as households incomes have decreased and lending standards have tightened.

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 24. Eight Complaints were field and closed over the five year reporting period.

TABLE 24: CLOVIS HOUSING DISCRIMINATION COMPLAINTS FILED WITH HUD/FHAP

Year	Number	Reasons
2009	2	Race (2)
2008	3	Race, Familial Status, Retaliation
2007	1	Disability
2006	1	Sex
2005	1	Familial Status
Total	8	Race (3), Familial Status (2), Retaliation (1), Disability (1), Sex (1)

Year	Number	How Complaints Were Closed
2009	5	Administrative, Conciliated (3), No Cause
2008	0	
2007	1	Conciliated
2006	1	Conciliated
2005	1	Conciliated
Total	8	Administrative, Conciliated (6), No Cause

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 provide the data summarized in Table 26. Eight complaints have been reported to the State of California Department of Fair Employment & Housing, four cases were closed as indicated in 25 table below. Four cases are currently open and the status could not be determined due to California law.

**TABLE 25:
CLOVIS HOUSING DISCRIMINATION COMPLAINTS FILED AND RESULTS
WITH STATE OF CALIFORNIA**

Year	Number	Reasons
2009	2	Race (2)
2008	3	Race (2), National Origin
2007	4	Race, Disability, Retaliation, Sex
2006	1	Marital Status
2005	1	Familial Status
Total	11	Race (5), National Origin (1), Familial Status (1), Retaliation (1), Disability (1), Sex (1), Marital Status (1)

Year	Number	How Complaints Were Closed
2009	4	Conciliated (2), Withdrawal w/ Resolution, Withdrawal w/o Resolution
2008	3	Conciliated (2), No Cause
2007	3	Conciliated, No Cause (2)
2006	0	
2005	1	Conciliated
Total	11	Withdrawal w/ Resolution (1), Withdrawal w/o Resolution (1), Conciliated (5), No Cause (3)

The Fair Housing Council of Central California (FHCCC) serves the Fresno Metropolitan area. It is a non-profit fair housing agency dedicated to the creation of racially and economically integrated communities and the elimination of discriminatory housing practices. The FHCCC provides fair housing outreach and education, investigation and enforcement of claims pertaining to fair housing infractions, advocacy and counseling. As an enforcement agency empowered by HUD under the Fair Housing Act, the FHCCC investigates and presses claims of housing discrimination for remedy and relief under law. Currently the FHCCC is not under contract with the City of Clovis, relying on HUD grants to provide services in the Fresno Metropolitan Area. Table 26 indicates the activity the FHCCC has undertaken in Clovis during the 2005-2009 period.

**TABLE 26:
CLOVIS HOUSING DISCRIMINATION COMPLAINTS FILED AND RESULTS WITH FHCCC**

In summary there were 19 fair housing complaints filed with the FHEO and DFEH. Table 27 summarizes the basis and end result of the complaints.

TABLE 27:

CLOVIS HOUSING DISCRIMINATION COMPLAINTS FILED AND RESULTS- ALL AGENCIES

Year	Number	Reasons
2009	4	Race (4)
2008	6	Race (3), National Origin, Familial Status, Retaliation
2007	5	Race, Disability (2), Retaliation, Sex
2006	2	Marital Status, Sex
2005	2	Familial Status (2)
Total	19	Race (8), National Origin (1), Familial Status (3), Retaliation (2), Disability (2), Sex (2), Marital Status (1)

Year	Number	How Complaints Were Closed
2009	9	Conciliated (5), Withdrawal w/ Resolution, Withdrawal w/o Resolution, Administrative, No Cause
2008	3	Conciliated (2), No Cause
2007	4	Conciliated (2), No Cause (2)
2006	1	Conciliated
2005	2	Conciliated (2)
Total	19	Withdrawal w/ Resolution (1), Withdrawal w/o Resolution (1), Conciliated (12), No Cause (4), Administrative (1), No Cause (4)

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 19 complaints were filed over five years, of which 13 were pursued past the initial complaint and received some form of agency services. Race was the most commonly reported basis of complaint as it represented 42% percent of all complaints received. 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.

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.

Neighborhood Stabilization Program

The City of Clovis received Neighborhood Stabilization Program funds through the Housing and Economic Recovery Act (HERA). This funding has been funneled through the State of California and allows the City to purchase foreclosures, rehabilitate, and sell to families with incomes of less than 120% of area median income. Homebuyers are required to participate in 16 hours of homebuyer training and the City offers mortgage assistance to ensure affordability.

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 household to purchase homes in Clovis. There is significant demand for these programs despite the current downturn in the housing market.

Housing Rehabilitation Program

Through an award of CalHOME funds the City offers a owner-occupied rehabilitation program to low-income home owners. The program provides up to \$40,000 in deferred, interest free, loan funds for work that is limited to health and safety repairs. There is strong interest in the program but many homeowners no longer have the equity necessary to support the rehabilitation loan despite the overwhelming need for repairs.

World Changers Program

In partnership with the World Changers organization, affiliated with the Southern Baptist Convention, the City of Clovis hosts 300 youth and contractors for one week during the summer. The City supplies materials to make repairs on at least 20 homes and World Changers supplies volunteers and construction knowledge. This results in significant deferred maintenance being completed at no cost to the low-income owner-occupant. Work completed includes re-roofing, fences, painting, and landscaping.

Mobile Home Grants Program

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

Mobile Home Painting Program

The City utilizes redevelopment funds to provide painting services to low-income seniors who own mobile homes in Clovis. The grants allow for the painting of the exterior of the mobile home. This program is very popular with strong interest year-to-year.

Summer Youth Yard Care Program

The City, in partnership with the Clovis Unified School District, utilizes redevelopment funds to provide on-the-job training for youth with disabilities. The youth provide services to moderate-income seniors and disabled persons including yard clean-up and window cleaning.

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 over \$8,000,000 in HUD 202 funding for 60 units of senior affordable housing which will compliment the 203 units that have already been developed and are operating.

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.

Code Enforcement

Recently the City hired 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 (2008), California Mechanical Code (2008), California Plumbing Code (2008), California Electrical Code (2008), and California Energy Code (2008). While all new construction must be in strict compliance with the codes, the City of Clovis has many older homes, many of which are located in and around the Old Town Clovis area, that were constructed prior to the establishment of building codes in the early 1940s. Code enforcement with respect to older homes is handled on a complaint basis. Should the City of Clovis elect to establish a

mandatory code enforcement program for older homes, it is anticipated that some of them would be improved, and other homes would be demolished and lost from the housing stock. Also, the Municipal Code limits the type of construction work that can take place on older homes located in other than residential zoned areas. 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 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 28 indicates zoning districts and the types of housing allowed in each.

TABLE 28: CLOVIS RESIDENTIAL LAND USE CATEGORIES

Designation	Average Density	Density Range	Purpose
Rural	1 DU/2 AC	0.5 DU/AC	Rural lifestyle and small-scale agricultural operation.
Very Low	2.0 DU/AC	.6 - 2.0 DU/AC	Large lot single family within an identifiable residential neighborhood.
Low	2.7 DU/AC	2.1 - 4.0 DU/AC	Conventional single family detached residential.
Medium	4.1 DU/AC	4.1 - 7.0 DU/AC	Detached and attached single-family homes, patio and zero lot line homes.
Medium High	10.2 DU/AC	7.1 - 15.0 DU/AC	Moderately dense single family detached on small lots, duplex and townhouses.
High	17.1 DU/AC	15.1 - 25.0 DU/AC	Multiple family apartments and condominiums.
Mixed-Use Residential	17.1 DU/AC	15.1 - 25.0 DU/AC ¹	Multiple family apartments and condominiums, duplex and townhomes in conjunction with commercial, office or business park uses.

1. Typical density range for Mixed Use residential is 15.1 to 25.0 du/ac. The Mixed Use Overlay Zone includes density standards permitting development at densities up to 43 du/ac under R-4 zoning for selected Mixed Use areas adjacent to transit centers and within Mixed Use area 27. These locations and acreages have not yet been determined.

These zones allow for a variety of housing opportunities to serve all citizens of Clovis with decent, safe, and affordable housing as depicted in Table 28. No significant barriers were identified for any of the housing types indicated in Table 29 (see page 53).

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 with the approval of a conditional use permit. 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 (CMC) section 9.3.104 F defines “family” as four or fewer unrelated persons, excluding servants; or two or more persons related by blood, marriage, or adoption, excluding servants, with or without the addition of not more than three unrelated persons; or seven or fewer persons devoting their full time to a religious or an ethical discipline and occupying a dwelling unit which is used exclusively for residential purposes.

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

The Planning Commission and City Council may approve group homes for individuals with disabilities, subject to a conditional use permit, after a noticed public hearing. This process allows for community input into the approval process, and is no different than the approval process necessary for a standard apartment complex that requires a conditional use permit. Examples of standard conditions for a group home would be a requirement for a one-year review of the use to ensure conformance with the conditions of approval, a requirement that the applicant make dedications of public right-of-way (when adjacent to an unimproved street), and a requirement that the applicant conform to all applicable development standards. The City does not have standard conditions of approval for group homes that will provide on-site services, however, the City will develop conditions for these uses on a case-by-case basis.

Although there is no provision in the City’s Municipal Code for parking requirement reductions for the development of handicapped housing, 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 (2008) 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 usually 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.

TABLE 29: CLOVIS RESIDENTIAL DEVELOPMENT STANDARDS

District	District Name	Density Units Per Acre	Uses Permitted	DUs Per Lot	Lot Coverage	Height	Minimum Lot Area	Minimum Lot Dimensions		Minimum Setback			Parking Required
								Width	Depth	Front	Side	Rear	
R-A	Single Family Residential	1.82	Homes, Horses, Poultry, Rabbits, Agricultural Uses	One	30%	35 Ft.	24,000 Sq. Ft.	110	130	35	10	20	2 Spaces
R-1-A R-1-AH	Single Family Residential	2.42	Homes, Horses (R1-AH) Agricultural, Poultry, Rabbits	One	30%	35 Ft.	18,000 Sq. Ft.	110	130	35	10	20	2 Spaces
R-1-B	Single Family Residential	3.63	Homes, Flowers, Vegetable Gardens	One	35%	35 Ft.	12,000 Sq. Ft.	80	110	35	10	20	2 Spaces
R-1-C	Single Family Residential	4.84	Homes, Flower and Vegetable Gardens	One	40%	35 Ft.	9,000 Sq. Ft.	70	110	25	7	20	2 Spaces
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	Homes, Flower and Vegetable Gardens	One	40%	35 Ft.	Designated by Zone Classification	60	100	20	5	20	2 Spaces
R-2 R-2-A	Low Density Multiple Family Residential	14.52	Homes, Multifamily Units Single Story and Uses permitted in R-3	One for each 3,000 Sq. Ft.	45%	35 Ft. (20 Ft. in R-2-A)	7,200 Sq. Ft.	60	120	20	5	20	1-1/2 to 2 Spaces ¹
R-3 R-3-A	Medium Density Multiple Family Residential	21.78	Homes, Multifamily Units, Libraries, Fraternity and Sorority Houses, Parks, Churches, Schools, Single Story Units	One for Each 2,000 Sq. Ft.	45%	35 Ft. (20 Ft. in R-3-A)	8,500 Sq. Ft.	60	120	15	5	15	1-1/2 to 2 Spaces ¹
R-4	High Density Multiple Family Residential	43.00	Homes, Churches, Day Nurseries, Rest Homes, Any Use permitted in R-3	One for Each 1,000 Sq. Ft.	60%	50 Ft. or 4 stories ²	10,000 Sq. Ft.	65	110	15	5	15	1-1/2 to 2 Spaces ¹
MHP	Trailer Park	18.15	Trailer Parks	2,400 Sq. Ft.	45%	35 Ft.	3 Acres	110	130	15	5	10	1 space plus 1/10

¹ 1-1/2 spaces required for studio or one-bedroom units, 2 spaces required for 2 bedrooms and above.
² Heights over 4 stories are permitted subject to a conditional use permit.

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 567 acres of vacant and developed C-2 zoned property within the City. Emergency and transitional uses would be 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.

Permit 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 30.

TABLE 30: STATE DEVELOPMENT PROCESSING TIME LIMITS

Item	State Maximum
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)

Discretionary projects are reviewed by both the Planning Commission and the City Council. The City does not have special design or environmental review procedures. However, 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. The City of Clovis typically assists 60 residential developers per year and provides this service without costs to the developer. The City's local processing times are further defined in Table 31.

TABLE 31: CLOVIS DEVELOPMENT PROCESSING TIME LIMITS

Item	Approximate Length of Time to Public Hearing
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 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 eleven 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). Typically, a developer can anticipate saving between \$50,000 and \$150,000 if an EIR is not required because the project is in a specific plan area and is covered under an existing EIR for that plan area.

The City of Clovis also maintains accountability goals for the processing of applications related to residential development. These regulate the time it takes to process applications. The processing time periods for the City of Clovis are substantially faster than the processing time typical in many other cities similar to Clovis in size, and approach what many jurisdictions consider "fast tracking." Overall time frame for processing applications before the Planning Commission and City Council is controlled to a large degree by compliance with the California Environmental Quality Act and the legal requirements for the noticing of public hearings. Under state law, public hearings must be noticed in a paper of general circulation 10 days prior to the date of the Planning Commission or City Council meeting. When a Negative Declaration or Mitigated Negative Declaration has been prepared for a project consistent with CEQA, a 20 day notice is required.

The City of Clovis has taken action to speed up the processing of tentative tract maps for residential subdivisions by eliminating City Council review of tentative tract maps in cases where the Planning Commission approves the map and there are no appeals to the City Council of the Commission's decision. This step reduces processing time by approximately four weeks and saves the residential developers a corresponding amount of costs associated with holding property while additional discretionary actions take place. The City also allows concurrent processing of applications which speeds up the process.

The City of Clovis Engineering Division is required to process a first submittal proposal for a subdivision within four weeks and each following submittal within two weeks. At present, the Engineering Division is meeting this requirement. Past experiences demonstrate that a developer and his engineer have to submit a minimum of three proposals after the first submittal before all conditions are met and all requested changes have been made. Submittals for new subdivisions can be processed within a minimum of three months. However, depending upon cooperation from the submitting engineer, it can take up to three years (the maximum time allowed), before a new tract map has to be submitted. This situation imposes additional costs to developers, which is beyond the control of the City.

It takes an average of two weeks before the plan for a residence can be approved by the City of Clovis Building Division. This average takes into consideration standard plans that have been submitted previously as well as new plans that may require changes. Usually, a new plan has to be submitted three times before it meets all building department requirements. Processing periods are not considered a constraint to the production of housing. The City processes residential projects within statutory time frames. The processing period is actually expedited for projects within Specific Plan areas as environmental review has been conducted and standards have been imposed (e.g. exactions and payment schedules), design, etc, for the entire area.

Costs associated with the permit process may act as a constraint to the development of low- income housing. The City currently does not waive fees for low-income housing. However, in cooperation with the Clovis Community Development Agency, these can be mitigated through financial and other assistance.

The City charges fees and assessments that correspond and pay for the cost of processing various types of applications. In addition to City fees and assessments, developers of new dwelling areas are obligated to pay school fees at a rate of \$3.58 per square foot for single family dwellings and apartment units, along with flood control fees and other special district assessments that will impact the residential projects. Generally, City fees are either associated with the processing of an application or the funding of a proportional share of major facility fees associated with delivery of essential City services such as sewer, water, fire protection, storm water drainage, and parks.

Density Bonus

The Density Bonus Ordinance (CMC Chapter 9.5) 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

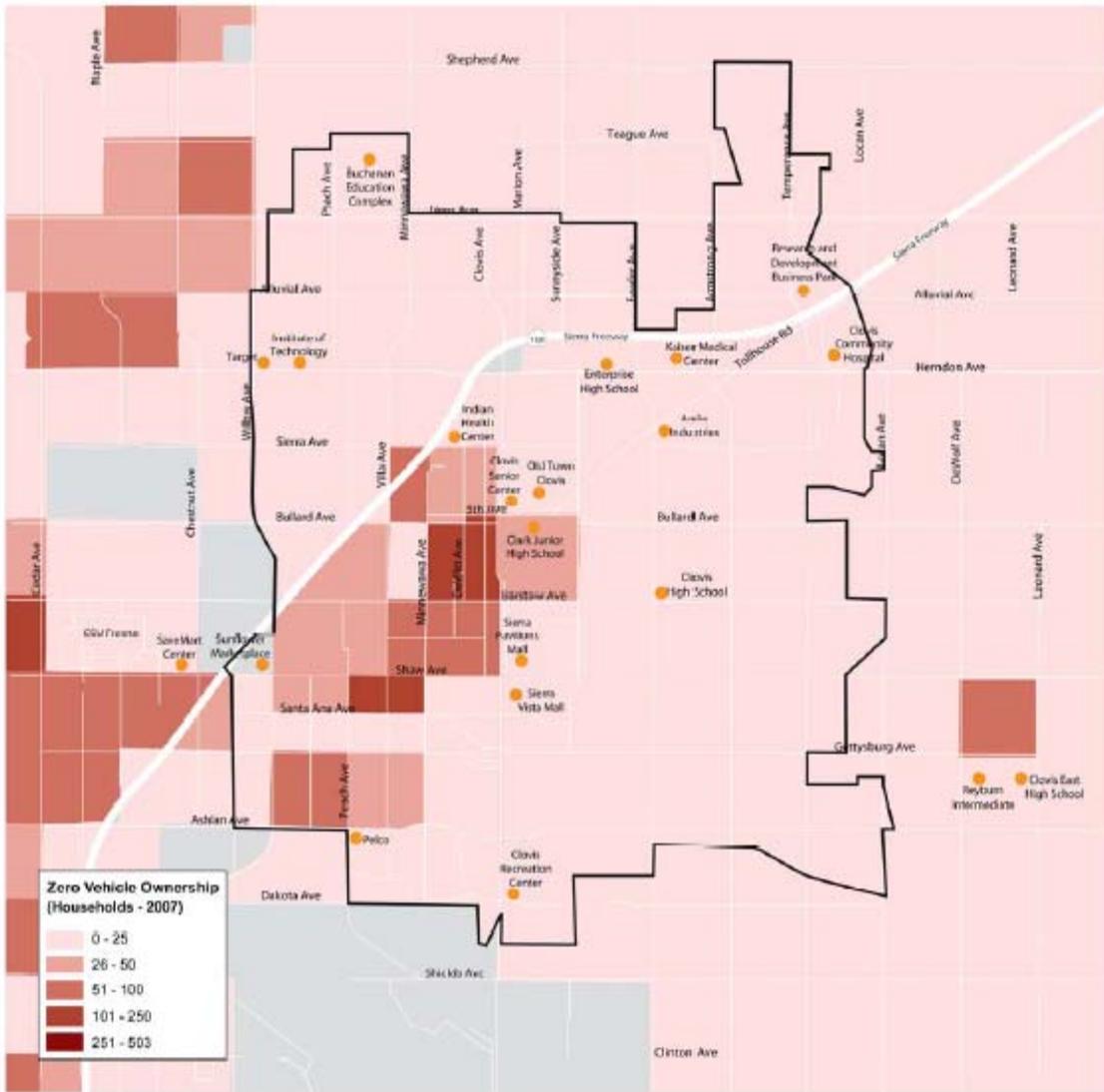
The City of Clovis has approximately 2,937 acres of undeveloped land. Of that undeveloped land, approximately 2,365 acres are designated by the General Plan for very low, low and medium density single family residential uses. The Plan designates 237 acres of the undeveloped land for multiple family uses and higher density/small lot single family attached and detached residential uses within the Project Area. Approximately 180 acres are reserved for medium high and high density residential uses within the Mixed-Use designations.

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. In 2009 a study was completed of the Clovis Transit System. The study found 66% of the ridership did not have access to a car and relied on the transit system to access day-to-day needs. This equates to 445 persons on a daily basis relying on the transit system geographically this is presented in Map 11. 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 11: ZERO VEHICLE HOUSEHOLDS IN CLOVIS



Source: Clovis Transit Study 2009

Sale of Subsidized Housing and Possible Displacement

The apartments listed in Table 32 provide a total of 394 rent restricted low-income rental units in Clovis. In 2007 Creek Park Village’s subsidy terminated, which resulted in 77 units converting to market rate.

Creek Park Village Apartments is a 192-unit rental project for seniors constructed in August 1985. The 77 units available for low- and very low-income senior households at Creek Park Village Apartments were required as a condition of receiving Multi-family Mortgage Revenue Bond Financing. These units were converted to market rate during 2007. According to the conditions set forth in the bond agreement, 20 percent of the total set-aside units, at least 16, were to be available for rent by very low-income households,

which earn less than 50 percent of the median income. The remaining 61 units were to be rented by low-income households at 51 percent to 80 percent of the median income. These set-aside units did not have any noticing requirements, nor were they regulated by any of the requirements regarding preservation of affordable units under the Federal Low Income Housing Preservation and Resident Homeownership Act (LIHPRHA). There are no other complexes at risk of conversion between 2010 and 2020.

TABLE 32: 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	2021
Sierra Hills Apartments	643 Fowler Avenue	Multi-family	Multi-family Mortgage Revenue Bond	114	23	2024
Silver Ridge Apartments	88 N. DeWitt Avenue	Multi-family Seniors	Tax Credits/Tax Increment/CDBG	100	100	2029
Willow Family Apartments	865 W. Gettysburg	Multi-Family	Tax Credits/Bonds/Joe Serna Farm Worker/HOME	68	68	2036
Lexington Square Apartments	1300 Minnewawa Avenue	Multi-family	Tax Exempt Bonds/Tax Credits	130	130	2029
Hotchkiss Terrace	51 Barstow Avenue	Multi-family Seniors	HUD Section 202 Grant/Redevelopment Agency Funding	75	75	2060

Source: City of Clovis

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 \$135,000, which includes land, construction costs, and site improvement costs, based on recent construction costs for similar structures 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. CDBG funds are provided to local government for a range of community development activities

that benefit low-income households. During the 20010-11 fiscal year, the City of Clovis received \$698,853 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.

The City has established a Redevelopment Agency and designated two project areas. The \$500,000 of annual low/moderate Income Housing Program set-aside funds represents a potential source of funding for preservation efforts. The expenditure plan for the Redevelopment Set-Aside Program should give priority to rehabilitation of low- and moderate-income units, preservation of assisted units, and construction of affordable housing. However, because CCDA has not participated in assisted unit preservation to date, this source should be considered in the context of a long-term preservation effort.

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, this was especially true during the housing boom that collapsed in 2008. Many buyers could not afford both a mortgage payment and the corresponding property tax bill. This was 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.

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 Central Valley Fair Housing Council. 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

The City of Clovis continues to support the efforts and actions taken to eliminate barriers identified in its Housing Element. These are identified as Goal #3 in the Housing Element and are included as Table 33. In addition the City continues to bolster the affordable housing stock through first-time homebuyer and rehabilitation programs.

**TABLE 33: CLOVIS HOUSING ELEMENT
AFFORDABLE HOUSING GOALS/STATUS**

Goal 3: Affordable housing for all economic segments of Clovis.		
Action Plan	Planned Objective	Level of Achievement/Future Status
Evaluate an inclusionary housing program that establishes affordable (for very low, low and moderate income) housing objectives for new residential development and provides incentives to the private housing industry in order to achieve these objectives.	Creation and use of a voluntary inclusionary housing program	Not achieved. Staff is working on a position that is supported by the building industry. <i>- Continue implementation.</i>
Provide a mechanism for establishment of a nonprofit housing corporation to be administered by the Redevelopment Agency.	A nonprofit housing corporation	This action item was not achieved, but it remains of interest. <i>- Continue implementation.</i>
Promote research in the areas associated with independent funding for housing programs.	Active use of independent funding for housing programs.	The City continues to explore use of revolving loan funding. City's loan portfolio currently contains \$7,224,869. CCDA keeps informed of housing funding opportunities. <i>- Continue implementation.</i>
Support, and if appropriate, provide technical assistance to both public sector and private sector efforts in the development and financing of low- and moderate-income housing.	Active support and technical assistance to development and financing of low- and moderate-income housing.	City has provided assistance to the Silver Ridge development, Hotchkiss Terrace, Coventry Cove, University Hope, State Center Community College District, Clovis Unified School District, Self-Help Enterprises, and Habitat for Humanity. Action item is achieved and ongoing. <i>- Continue implementation.</i>
Continue cooperation with the Fresno County Housing Authority to provide Section 8 rental units or Section 8 assistance to eligible tenant households.	Intergovernmental cooperation for Section 8 housing.	CCDA has made referrals to the Housing Authority for tenants and property owners and maintains regular communication with the Housing Authority. Action item is achieved. <i>- Continue implementation.</i>

Fair and equal housing opportunity remains an important issue in the City. It is the City’s goal that all persons have an opportunity to choose a suitable home. The housing element goal #5 summarizes these efforts in Table 34.

**TABLE 34: CLOVIS HOUSING ELEMENT
EQUAL HOUSING OPPORTUNITY GOALS/STATUS**

Goal 5: Equal housing opportunity for all residents of Clovis.		
Action Plan	Planned Objective	Level of Achievement/Future Status
Evaluate the feasibility of reducing development fees for projects providing low income and senior citizen housing.	Fee burden reduced for qualifying housing projects.	Through CCDA, the City has mitigated development fees for qualifying housing projects. - <i>Continue implementation.</i>
Revise existing Municipal Code ordinances as necessary during consistency with General Plan review to ensure that none discriminate against any residential development or emergency shelter because of method of financing, race, sex, religion, national origin, marital status, or disability of its owners or intended occupants.	Revised Municipal Code in accordance with this action.	The Development Code update is in process and is expected to be completed in 2008. - <i>Continue implementation.</i>
Provide referral services to community organizations and service providers that address special needs groups.	Timely and effective referral services.	CCDA provides referral services in accordance with this action. Ongoing service. - <i>Continue implementation.</i>
Allow transitional facilities in high-density residential portions of mixed-use areas and emergency shelters in commercial and industrial areas. Development of these facilities will be subject to discretionary approval.	Transitional facilities in high-density residential portions of mixed-use areas and emergency shelters in commercial and industrial areas, subject to discretionary approval.	An ordinance amendment was approved in 2004 permitting emergency and transitional housing in the C-2 Zone District by right and the R-3 Zone District subject to a conditional use permit. Action achieved. - <i>Continue implementation.</i>
Encourage owners of active agricultural land to provide temporary housing for migrant farm workers.	Temporary housing for migrant farm workers.	The City is supportive of housing actions for all members of the population. - <i>Continue implementation.</i>

City of Clovis Annual Action Plan and Consolidated Annual Performance and Evaluation Report

The Annual Action Plan and Consolidated Annual Performance and Evaluation Report for use of Community Development Block Grant funds provides a venue to plan for activities that reduce or remove barriers to affordable housing and then reports on progress made. In the both documents a summary of barriers and efforts being undertaken is provided. This is included as Table 35.

**TABLE 35: CLOVIS ACTION PLAN
ACTIONS TO REDUCE IMPEDIMENTS TO AFFORDABLE HOUSING**

Provision of Adequate Housing Sites					
Housing Program	Program Intent	Plan Objective	Funding Source	Stated Time Frame	Current Status
Affordable Housing Development	Acquire sites (or funds) for affordable/senior housing	Develop a landbanking program for acquisition of sites for affordable/senior housing to be developed in conjunction with nonprofits or private developers.	CDBG funds; tax increment set-aside; in-lieu fees; General Fund	2007	Property Purchased Subdividing Land 2 Lots Ready to Build on
Assist in the Development of Affordable Housing					
Clovis Community Development Agency – Fresno City College and nonprofit agencies	Continue Programs assisting low- and moderate income households to become homeowners	Build an average of 2 homes per year with development partners that will be affordable to low- and very low-income homebuyers	Tax increment financing, CHFA; CDBG; Other	Ongoing	2 Homes Completed in Program Year 2008-09
Clovis Community Development Agency – Self Help Enterprises	Continue to Partner with Self Help Enterprises to assist very low- and moderate income households to become homeowners	Build an average of 5 homes per year with Self Help Enterprises. Market homes to low- and very low income families	Tax increment financing, CHFA; CDBG; Other	Ongoing	Developing tract map, improvement plans and home plan for 17 lots on property purchased with County of Fresno CDBG funds.
Nongovernmental Constraints	Promote homeownership opportunities and development of affordable housing	Research alternative methods of financing. Utilize available sources for write down of infrastructure or land costs	CDBG Tax Increment Financing	Ongoing	On HUD Task force for San Joaquin Valley, working to develop Affordable Housing Trust Fund On Community Housing Council Board promoting Home Ownership throughout the region.
Conserve and Improve Existing Affordable Housing					
Preservation Program	Conserve affordable housing in the City	Encourage Section 8 property owners to renew contracts. Identify nonprofit to manage properties.	Tax increment Financing CDBG	Ongoing	Contacted and worked with several property owners to maintain affordability.
Residential Rehabilitation Assistance	Preserve existing housing stock	Continue residential rehab and summer youth program	CDBG Redevelopment Set Aside	Ongoing	59 units rehabilitated in Program Year 2008-09

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 despite record breaking declines in the real estate market. With the median sales price of \$235,000 for a home in Clovis only a household earning a moderate income would be able to pursue a purchase of a median priced home. This results in the majority of Clovis residents struggling to purchase a home and may be burdened with high housing costs. Rental affordability is also an issue for Clovis residents as 46% of rental households expend more than 30% of their income on housing.

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: Offer regulatory relief and incentives in cooperation with the Clovis Community Development Agency for the development of affordable housing.

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

1.4 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 for alternative private and public funding opportunities that can provide additional support to the City’s affordable housing programs.

2.2 Action: Review City’s Affordable Housing Program Guidelines and current market conditions to ensure the most efficient use of available funds.

Mortgage Lending

The analysis of home mortgage lending patterns revealed that minority groups were less likely to be approved for a mortgage to purchase a home. When compared to the incomes of these groups it appears they are not being discriminated against by the lending institutions but rather are not able to obtain financing due to lower incomes.

This is also evident in the leading reason for denial is debt-to-income ratios (26%) not being within required parameters. This is especially evident on Table 22 that shows reason for denial by income category with over 45% of applicants denied due to debt-to-income ratio earned below 50% of the median income while denied applicants earning over 120% of median were denied for this reason 19% of the time.

Geographically loan denials are higher in lower-income neighborhoods but they have improved since an analysis of 2006 HMDA was conducted. Interestingly denial rates were higher in newer, more affluent census tracts at the north end of the City. Paired again with the most often reason for denial being debt-to-income ratios it appears affordability and related levels of income are the number reason for denial. In addition, the change reflects the impact the recession has had on the home lending market in Clovis. More affordable properties in lower-income areas have had greater success of being financed as households incomes have decreased and lending standards have tightened.

3. IMPEDIMENT: Differential Origination Rates for households of low-income status including minorities.

3.1 Action: The City will monitor periodically Home Mortgage Disclosure Act (HMDA) data and report significant trends in mortgage lending by race, ethnicity, and household income.

3.2 Action: The City will support activities of local organizations to improve homebuyer loan readiness through pre-purchase counseling, credit counseling, and home-buyer education programs.

3.3 Action: The City will continue to implement its Economic Development Strategy to increase the income levels for all households in Clovis.

3.4 Action: The City will continue to offer and support home purchase programs for low-income households.

3.5 Action: When selecting lending institutions for contracts as part of an affordable housing project or program, the City may prefer lending institutions with a Community Reinvestment Act (CRA) rating of “Outstanding”. The City may exclude those with the rating of “Needs to Improve,” or “Substantial Noncompliance”

according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC).

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.

4. IMPEDIMENT: Lack of knowledge of fair housing rights

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

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

5. IMPEDIMENT: Lack of information on the nature and basis of housing discrimination

5.1 Action: Monitor the incidence of housing discrimination complaints and report trends in the Consolidated Annual Performance and Evaluation Report (CAPER).

5.2 Action: If deemed necessary, create an action item in the City's Annual Action Plan that addresses the trend of discrimination complaints as identified in the CAPER

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 encourages 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.

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

6.1 Action: The City will continue to study the public transportation system and recommend improvements as funds allow to better serve all populations, including low-income and special needs households.

7. IMPEDIMENT: Shortage of rental subsidy vouchers

7.1 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.

RESOLUTION 10-100

A RESOLUTION OF THE CITY COUNCIL OF CLOVIS ADOPTING THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

WHEREAS, the City Council of the City of Clovis is a U. S. Department of Housing and Urban Development (HUD) entitlement city for the purpose of receiving Community Development Block Grant funds; and

WHEREAS, HUD requires the City of Clovis to adopt an Analysis of Impediments to Fair Housing Choice;

NOW, THEREFORE, BE IT RESOLVED that the Clovis City Council approves and adopts the Analysis of Impediments to Fair Housing Choice.

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on the 13th day of September, 2010, by the following vote, to wit:

AYES: Councilmembers Flores, Magsig, Whalen, Mayor Armstrong

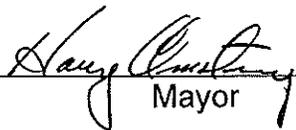
NOES: None

ABSENT: Councilmember Ashbeck

ABSTAIN: None

DATED: September 13, 2010





Mayor



City Clerk

CITY OF CLOVIS

1033 5TH STREET

CLOVIS, CA 93612

ATTN: ACCOUNTS PAYABLE

PROOF OF PUBLICATION

COUNTY OF FRESNO STATE OF CALIFORNIA

EXHIBIT A.

PUBLIC NOTICE
#144412
NOTICE OF PUBLIC COMMENT PERIOD,
PUBLIC INPUT MEETING, AND
NOTICE OF PUBLIC HEARING FOR THE
2009-2010 CITY OF CLOVIS CONSOLIDATED ACTION PERFORMANCE AND
EVALUATION REPORT
AND
THE CITY OF CLOVIS' ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING
CHOICE

The City of Clovis will have copies of the 2009 - 2010 Consolidated Annual Performance and Evaluation Report (CAPER) for the Federal Community Development Block Grant Program (CDBG) available for public review and comment. In addition the City will have copies available of the Analysis of Impediments to Fair Housing Choice available for public review and comment. Copies will be available during the 30-day comment period beginning August 12, 2010 and ending September 10, 2010 at the following locations:

Clovis Community Development Agency: 356 Pollosky Avenue, Suite 200, Clovis, CA 93612
Fresno County Public Library in Clovis: 1155 Fifth Street, Clovis, CA 93612
Clovis Senior Center: 850 4th Street, Clovis, CA 93612
City Hall: 1033 Fifth Street, Clovis, CA 93612
On the Web: www.cityofclovis.com

A public input meeting will be held on August 26th, 2010 at 6 p.m. at the Clovis Community Development Agency located at 356 Pollosky, Suite 200, Clovis. Citizens may provide their views and comments on the 2009 - 2010 CAPER and the Analysis of Impediments to Fair Housing Choice.

Additionally, a public hearing will be held on September 13, 2010 at 6 p.m. in the City of Clovis Council Chambers located at 1033 Fifth Street, Clovis. Citizens may provide their views and comments on the 2009 - 2010 CAPER and the Analysis of Impediments to Fair Housing Choice.

By this Notice, the City of Clovis invites parties that have an interest or may be impacted by the activities discussed in the Plan to attend the Input Meeting and/or Public Hearing. Citizen participation is considered an important element of the CAPER and Analysis of Impediments to Fair Housing Choice process and is encouraged by the U.S. Department of HUD. All written comments received by September 12, 2010 at the address below will be considered and included as an attachment in the CAPER or the Analysis of Impediments to Fair Housing Choice.

Additional information concerning the CAPER, Analysis of Impediments to Fair Housing Choice or the CDBG Program can be obtained by contacting:
Andrew Haussler
Housing Program Manager
356 Pollosky Ave., Suite 200
Clovis, CA 93612
(559) 324-2095

(PUB: August 12, 2010)

The undersigned states:

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am the printer and principle clerk of the publisher of THE THE FRESNO BEE, CLOVIS ZONED EDITION, printed and published in the City of Fresno, County of Fresno, State of California weekly for which said newspaper has been adjudged a newspaper of general circulation by Superior Court of the County of Fresno, State of California, under the date of January 17, 1995, Action No. 56881; that the notice, a copy of which is hereto annexed, marked Exhibit A, has been published in each issue thereof and not in any supplement thereof on the following dates, to wit:

August 12, 2010

I certify (or declare) under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Fresno, California.

Dated August 12, 2010

