

4.2 POPULATION, EMPLOYMENT AND HOUSING

4.2.1 INTRODUCTION

This section describes the anticipated changes in population, employment, and housing, including the jobs-to-housing balance and affordable housing, resulting from development of the proposed project. Impacts associated with growth inducement are discussed in Chapter 5, *CEQA Considerations*.

For this Section, the following documents were reviewed:

- *West Roseville Specific Plan EIR*, February 2004
- *City of Roseville Quarterly Development Activity Report*, First Quarter 2009
- *Sacramento Area Council of Governments Final Regional Housing Needs Plan*, adopted February 2008
- *City of Roseville Draft General Plan Housing Element*, October 2008

The documents listed above are available for review during normal business hours at:

City of Roseville Permit Center

311 Vernon Street
Roseville, CA 95678

No comments were received relative to population and housing in response to the Notice of Preparation (NOP) and Initial Study (Appendix A). Refer to Appendix B of this EIR to view the comments received on the proposed project in response to the NOP.

4.2.2 ENVIRONMENTAL SETTING

Population

Regional Population

The Sacramento Metropolitan Statistical Area (MSA) includes the counties of Placer, Sacramento, and El Dorado. This region, in addition to contiguous counties of Yolo, Sutter, and Yuba, which collectively represent the Sacramento Area Council of Governments (SACOG) has been one of the fastest growing areas of the state for most of the decade. While the current trend in population growth has slowed, the long-term forecast for the region is that it will continue to grow. The population of Placer County from 2005-2007 was 324,000.

City of Roseville Population

From 2000 to 2008 the City of Roseville's population increased from 79,921 to 109,437¹, an addition of 29,516 persons or 37% increase. Roseville's population for January 1, 2009 is estimated to be 112,343².

**TABLE 4.2-1
PLACER COUNTY POPULATION AND GROWTH RATES**

Jurisdiction	January 1, 2008	January 1, 2009	Growth Rate (%)
Auburn	13,306	13,432	0.95
Colfax	1,860	1,878	0.97
Lincoln	39,300	40,060	1.93
Loomis	6,642	6,677	0.53
Rocklin	54,046	54,754	1.31
Roseville	109,437	112,343	2.66
Unincorporated Placer County	109,175	110,433	1.15
Placer County Total	333,766	339,577	1.74

¹ California State Department of Finance

² City of Roseville Office of Economic Development

Employment

Regional Employment

Although the economy has dramatically slowed over the last two years, over the past decade the Sacramento MSA economy continued to grow at a significant rate, as non-agricultural employment increased throughout the region. Job growth was seen in: education, health and social services, retail trade, professional, scientific, management and administrative, and manufacturing. Services, retail trade, government, and wholesale trade all increased to meet the needs of the region's expanding population base.

Placer County's economy is continuing to evolve from its historical dependence on the railroad industry, the lumber and wood products industry, and agriculture. In 2007, only one percent of the employment industry remained in agriculture or forestry in Placer County.³ In 2007, Placer County had a total labor force of approximately 168,162.

City of Roseville Employment

With approximately 74,000 jobs in 2008 (a 5% decline over the previous year)⁴, Roseville employment represented 44% of Placer County's total employment.

Douglas Boulevard, the I-80 corridor, and the North Industrial Area are the City's major employment centers. Assuming 1.26 workers per household⁵, there would be approximately 72,093 employable residents in 2025 (based on 2025 projected dwelling units of 57,217).

Housing Supply

Region and Placer County

The number of housing units in Placer County in 2007 was estimated to be 145,093. This represents a 73% increase over the 2000 supply. Nearly 80% of housing units were single family residences.

³ U.S. Census FactFinder Placer County, 2005-2007 Narrative, accessed February 9, 2009.

⁴ Karen Garner, personal communication, City of Roseville Office of Economic Development, May 2009.

⁵ Based on 2000 Census data.

City of Roseville

As of March 31, 2009, there were 46,620 dwelling units in the City⁶. The General Plan land use allocation provides for a total of 57,217 dwelling units. This includes approximately 300 units that are not allocated to a specific geographic location, and that have been specifically reserved for use by the City in certain housing programs, such as density bonuses and other development incentives. The available un-built housing pool is approximately 10,293 units, with a majority in the West Roseville Specific Plan area. Based on City growth projections, it is expected that the current residential land use allocation will be exhausted by 2020. Despite the current economic slow down, Roseville grew by 2.66% over the last year.

Approximately 66% of the units are low density residential homes. Medium and high-density residential construction has increased substantially since 2000, to approximately 33% of the homes in Roseville.

TABLE 4.2-2
SUMMARY OF ROSEVILLE HOUSING UNITS
AS OF MARCH 31, 2009

Residential Land Use	Allocated Units	Developed Units	Undeveloped Units
Low Density Residential	38,117	33,308	4,809
Medium Density Residential	7,130	4,543	2,587
High Density Residential	11,666	8,769	2,897
TOTAL	56,913	46,620	10,293

Source: City of Roseville Quarterly Development Activity Report.

⁶ Quarterly Development Activity Report, City of Roseville Planning Department, March 31, 2009.

Housing Affordability

Housing affordability refers to the relationship between total household income and total household expenditures for housing costs. This relationship is typically expressed as the percentage of total household income allocated to housing expenditures. The City of Roseville assumes that very low and low income households should not spend more than 30% of their gross monthly income on housing costs, including payment of utilities, for rental housing. For middle income households, 35% of monthly gross income is used to determine housing cost affordability. Purchase housing costs include payment of principal, interest, taxes, insurance and any homeowner's association dues.

Table 4.2-3 shows the City of Roseville's income categories as defined by the U.S. Department of Housing & Urban Development (HUD), which are published annually.

In 2007, the median housing price for existing single-family homes and condominiums in Roseville dropped 23.6% to \$340,000 from \$445,000 the previous year.⁷

TABLE 4.2-3
2009 MEDIAN HOUSEHOLD INCOME BY FAMILY SIZE
FOR THE SACRAMENTO METROPOLITAN STATISTICAL AREA (MSA)

Family Size	Extremely Low Income	Very Low Income	Low Income	Middle Income	Moderate Income
	30% of Median Income	50% of Median Income	80% of Median Income	100% of Median Income	120% of Median Income
1	\$15,300	\$25,500	\$40,800	\$51,000	\$61,200
2	\$17,500	\$29,100	\$46,600	\$58,200	\$69,840
3	\$19,650	\$32,750	\$52,450	\$65,500	\$78,600
4	\$21,850	\$36,400	\$58,250	\$72,800	\$87,360
5	\$23,600	\$39,300	\$62,900	\$78,600	\$94,320
6	\$25,350	\$42,200	\$67,550	\$84,400	\$101,280

Source: Published by HUD March 19, 2009. Sacramento MSA includes Placer, El Dorado and Sacramento Counties.

⁷ Placer County Association of Realtors.

In order to address the need for affordable housing, a Regional Housing Needs Allocation Plan was developed by the Sacramento Area Council of Governments (SACOG). This plan allocates housing needs to each local jurisdiction for a seven and half year period. The current allocation was assigned for the years 2006-2013, and identifies Roseville requiring appropriately zoned land to accommodate 8,933 housing units.

Table 4.2-4 indicates the division of the housing unit allocation by income group to the City of Roseville, which has been adjusted based on the production of 1,813 housing units from 2006 through 2007. Roseville's "fair share" allocation of housing units requires our jurisdiction to provide appropriate zoning for a total of 7,120 housing units from 2008-2013.

TABLE 4.2-4
ADJUSTED REGIONAL HOUSING NEEDS ALLOCATION
FOR ROSEVILLE 2008-2013⁸

Income Category	Percentage	Number of Dwelling Units
Very Low	38%	2,665*
Low	24%	1,721*
Moderate	20%	1,455
Above Moderate	18%	1,279
Total	100%	7,120

**Required to be met by providing High Density Residential (HDR) zoning designations per the Regional Housing Need Allocation Plan*

The Housing Element of the General Plan has established goals and policies designed to encourage the construction of affordable housing. These include working with the development and business communities to provide affordable rental and purchase opportunities, requiring 10% of new housing units to be affordable, and continuing to participate in State and federal programs. Despite the city's efforts to provide affordable opportunities, there are significant challenges in meeting the Regional Housing Needs targets. The City's 10% Affordable Housing

⁸ Derived from 2008 City of Roseville draft Housing Element of General Plan. Adjustments were made for actual housing production documented for 2006 and 2007.

Goal for new units is anticipated to be an achievable goal, but it is recognized that it may not result in construction of all of the units contemplated by the SACOG Regional Housing Need Allocation assigned to the City. Although a higher goal could be considered by the City, it has been preferable to set a realistic goal, based on the fiscal realities of affordable housing development, rather than one that cannot be achieved. The City has had great success in implementing its housing goals and providing affordable units, since the 10% Affordable Housing Goal was established in 1988. It should also be noted that the high density housing unit allocations cited in the above table do not require those units to be affordable; rather, the law requires only that appropriate zoning be available in the City to provide the opportunity to provide affordable housing through higher density zoning. In other words, the “fair share” allocation, as a legal matter, relate to land, and not actual construction. The law requires only that sufficient land be planned and zoned to accommodate certain numbers of housing units for various income categories, and does not require local governments to ensure that all contemplated residential units actually get constructed.

Job/Housing Balance

The jobs/housing balance refers to the location of residences in relation to the location of employment generating uses. A well-balanced ratio of jobs and housing is assumed to reduce the number of vehicle trips resulting from commuting, because employment opportunities and commercial services are near residential areas. This potential reduction in vehicle trips improves air quality, reduces greenhouse gas generation, and provides options for walking/biking to work.

The City’s General Plan has established its support for a jobs/housing balance through General Plan policy LE-1 which states:

The City shall strive for a land use mix and pattern of development that provides linkages between jobs and employment uses, will provide a reasonable jobs/housing balance, and maintain the fiscal viability of the City.

As of March 2009, there were 46,620 dwelling units in the City. Approximately 58,740 workers could be housed within the City, assuming a worker per household ratio of 1.26. It is estimated that there were 74,000 jobs in the City of Roseville in 2008. Therefore, there was a ratio of 1.58 jobs compared to housing units in 2009.

4.2.3 REGULATORY SETTING**Federal**

There are no federal regulations that would apply to the project area.

State

A Regional Housing Needs Plan (RHNP) is mandated by the State of California (Government Code Section 65584) for regions to address housing issues and needs based on future growth projections for the area. The RHNP for the Sacramento region is developed by SACOG, and allocates to cities and counties their “fair share” of the region’s projected housing needs based on household income groupings over the planning period for each specific jurisdiction’s housing element.

The California State Legislature has declared its intention to support enabling California workers the opportunity to live close to their job site (Government Code Section 65890.1h).

CEQA sets forth special rules on the subject of “growth-inducing” effects. Specifically, a draft EIR must discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. (Pub. Resources Code, § 21100, subd. (b)(5); CEQA Guidelines, §§ 15126, subd. (d), 15126.2, subd. (d).) The analysis must discuss those project characteristics that may encourage and facilitate activities that, either individually or cumulatively, will affect the environment. Population increases, for example, may impose new burdens on existing community service facilities. Similarly, the expansion of a waste water treatment plant might induce new development in an area, thereby triggering related growth-associated impacts. The lead agency must never assume that growth in an area is necessarily beneficial or of little significance environmentally. (CEQA Guidelines, § 15126.2, subd. (d).)

City of Roseville

The City of Roseville General Plan includes goals and policies for adequate housing stock and employment opportunities. Policy HB-3 requires a 10% Affordable Housing Goal be applied to all residential properties planned for four or more units.

4.2.4 IMPACTS

Method of Analysis

The analysis developed for this section is designed to address existing conditions. For a discussion of cumulative impacts on population, employment and housing, refer to Chapter 5, *CEQA Considerations*.

Population

The increased resident population resulting from the development of the Sierra Vista Specific Plan (SVSP) area is estimated by multiplying the total number of residential units by the average number of residents per dwelling unit (see Table 4.2-5). For this analysis, the average number of residents per housing units is assumed to be 2.54 for low and medium density residential uses. For multi-family dwellings, the average number of residents per housing units is assumed to be 1.8.

**TABLE 4.2-5
SIERRA VISTA PROJECTED POPULATION**

Residential Density Designation	Proposed Acreage	Proposed Units	Population
Low-Density	502.4	2,524	6,411
Medium-Density	250	2,221	5,641
High-Density	67.9	1,650	2,970
Commercial Mixed Use	34.9	255	459
Total	855	6,650	15,481

Employment

The additional jobs that could result from the development of the SVSP are calculated based upon the types of commercial development and the estimated amount of floor area of each commercial development. The assumed floor-to-area (FAR) is 0.30 for business professional/office and 0.20 for

commercial/retail. According to the specific plan, the project would accommodate approximately 3.4 million square feet of retail and office uses, and provide in excess of 7,500 jobs.

Housing

The SVSP would add approximately 6,650 additional residential units to the City of Roseville. The analysis discusses affordability of the city's housing supply and compares the affordable housing provided in the SVSP.

Thresholds of Significance

For the purpose of this analysis, the following applicable thresholds of significance have been used to determine whether implementing the proposed project would result in a significant impact. These thresholds of significance are based on Appendix G of the State CEQA Guidelines and professional judgment. A population, employment, and housing impact is considered significant if implementation of the proposed project would do any of the following:

- Induce substantial population growth in an area, either directly (by proposed new homes and businesses) or indirectly (through the extension of roads or other infrastructure);
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere; or
- Result in employment or housing conditions inconsistent with the City's affordable housing goals, policies, or objectives in the General Plan to the extent that any such inconsistency will foresee ably result in adverse changes in the physical environment.

Although CEQA is concerned with physical environmental effects related to population, employment, and housing issues, the City, in preparing this DEIR, has nevertheless included, for purposes of full disclosure, a discussion of how well the proposed project would satisfy General Plan affordable housing policies, even though noncompliance would not translate into physical environmental effects.

IMPACT 4.2-1	SIGNIFICANT CHANGE IN THE JOBS/HOUSING BALANCE	
Applicable Policies and Regulations	City of Roseville General Plan	
	SVSP	Urban Reserve
Significance with Policies and Regulations	Less Than Significant	Less Than Significant
Mitigation Measures:	None Required	None Required
Significance after Mitigation:	Less Than Significant	Less Than Significant

SIERRA VISTA SPECIFIC PLAN

As of March 2009, there were 46,620 dwelling units in the City. Approximately 58,740 workers could be housed within the City, assuming a worker per household ratio of 1.26. It is estimated that there were 74,000 jobs in the City of Roseville in 2008. Therefore, there is a ratio of 1.58 jobs compared to housing units in 2009.

The SVSP would be expected to house approximately 8,379 additional workers, based on 1.26 workers per housing unit (6,650). Citywide, with buildout of the SVSP, there would be more than 81,500 jobs (current jobs, plus 7,500 jobs projected for SVSP), as there is much more commercial, business professional and industrial acreage available for development. Specifically, there are 837.92 acres of non-residential (commercial, business professional, and central business district), as well as 1,547.32 acres of industrial zoned parcels remaining to be developed within the City limits. With a projected employable population of 80,479⁹ at buildout of the City (including SVSP), there would still be more jobs than housing units needed to accommodate City of Roseville workforce within the city limits, even if no more non-residential development occurred (outside of SVSP), with a ratio of 1.27 jobs to housing units.

⁹ Based on 63,872 housing units, with 1.26 workers per household

The SVSP would take a number of years to build out. Therefore, the jobs/housing ratio must be considered in the context of other development within the City. The change in the jobs/housing balance would depend on the type of development approved and the timing of residential versus non-residential development. Short-term imbalances could occur, particularly if commercial uses do not develop as quickly as residential uses, which is likely.

The SVSP includes commercial and business professional uses. The development of these uses is anticipated to increase employment within the SVSP project area. Overall, the SVSP is projected to add more housing than jobs. This will cause a decrease in the City's overall jobs/housing ratio, and provide additional housing opportunities. As a result, over time the preponderance of housing within the SVSP will help the City to achieve the environmental benefits (reduced commuter mileage, etc.) associated with an improved jobs/housing ratio. This impact is therefore considered **less than significant**.

URBAN RESERVE

It is likely that urban development of the Urban Reserve would include commercial and business professional uses. The development of these uses is anticipated to increase employment within the area. Although no specific development is proposed at this time, it is expected to add more housing than jobs. This will cause a decrease in the City's overall jobs/housing ratio, and provide additional housing opportunities. As a result, over time the preponderance of housing will help the City to achieve the environmental benefits (reduced commuter mileage, etc.) associated with an improved jobs/housing ratio. This impact is therefore considered **less than significant**.

IMPACT 4.2-2	PROVISION OF AFFORDABLE HOUSING	
Applicable Policies and Regulations	City of Roseville General Plan Policy HB-3	
	SVSP	Urban Reserve
Significance with Policies and Regulations	Less Than Significant	Significant
Mitigation Measures:	None Required	WMM 4.2-1 Affordable Housing Policies
Significance after Mitigation:	Less Than Significant	Less Than Significant

SIERRA VISTA SPECIFIC PLAN

The City requires that 10% of all new housing built be affordable. The SVSP would add 6,650 dwelling units to the city, for a requirement of 665 affordable units. In addition, of the total units, approximately 25% would be zoned high-density residential, which provides opportunities for affordable housing.

**TABLE 4.2-6
AFFORDABLE UNITS PROPOSED IN THE SVSP**

Income Category	Units Required to Meet Goal	Percentage of Affordable Housing Units
Very-low Income	266	40%
Low-Income	266	40%
Middle-Income	133	20%
Total Affordable Housing	665 (10% of 6,650)	100%

As discussed in the Section 4.2.2 and Table 4.2-4, the RHNA requires that the City of Roseville provide for planned and zoned land sufficient to accommodate 7,120 housing units in the current RHNA planning period (2008-2013). This allocation exceeds the number of housing units planned in the SVSP. Further, the RHNA requires the zoning for 4,386 high density residential units, which far exceeds 50% of the SVSP planned unit allocation.

Creating a specific plan that includes over 50% high density housing, however, would not meet City General Plan policies requiring a balance of land uses, and the provision of adequate services. The City of Roseville will meet its RHNA obligation through adequate sites city-wide, not concentrated in one area. Notably, nothing in the law requires a different approach, as compliance with “fair share” requirements is judged on a jurisdiction-wide basis.

The City is required to show that there are adequate sites planned and zoned or otherwise provided for to accommodate its regional housing need as established by SACOG. The SVSP specifically includes housing sites zoned to accommodate over 30 dwelling units/acre, consistent with state standards, which will be required of the next planning period (2013 – 2020). The SVSP, while it would not accommodate 100% of the City’s RHNA obligation, would substantially increase the City’s ability to identify sites to meet its obligation for high density residential zoning which could accommodate lower income households. The SVSP, then, helps rather than hinders the City in its efforts to meet its “fair share” obligations.

The SVSP would add 6,650 new units. The SVSP would comply with the General Plan Housing Element by designating 10% of the total SVSP housing stock for participation in the affordable housing program defined in this section. Twenty percent of affordable housing requirements would be met through purchase housing, affordable to middle-income residents (133 units). Eighty percent of the affordable units would consist of rental units for very low- and low-income households (266 low income and 266 very low income, or 40% each). Affordable units would be dispersed throughout the neighborhoods; as described in Table 4.2-7 and illustrated on Figure 4.2-1 (Affordable Housing Locations).

**TABLE 4.2-7
AFFORDABLE HOUSING BY PARCEL**

Parcel	Land Use	Total Units in Parcel	Total Affordable Allocation	Very Low Income Rental	Low Income Rental	Middle ² Income Purchase
CO-20	MDR	84	34	0	0	34
KT-20	MDR	202	31	0	0	31
DF-20 ¹	MDR	120	23	9	9	5
CG-20	MDR	44	20	0	0	20
FD-30	HDR	86	86	43	43	0
FD-31	HDR	86	86	43	43	0
JM-30	HDR	138	138	69	69	0
FD-32	HDR	178	43	0	0	43
CG-31	HDR	420	80	40	40	0
KT-30	HDR	150	124	62	62	0
Total			665	266	266	133

The total number of affordable units would be 665, which represents 10% of the total number of dwelling units. Because the number of affordable housing units would be 10%, the project is consistent with the City policy. Because the project does not violate General Plan policy in a way that translates into adverse physical consequences, the impact would be **less than significant**.

URBAN RESERVE

The Urban Reserve would add additional housing units to the City. Consistent with city policy ten percent of the proposed dwelling units would be affordable. No specific development is proposed in the Urban Reserve areas at this time, therefore, the number of affordable units that would be provided is not known. This could be a **significant** impact.

WMM 4.2-1 *Affordable Housing Policies* requires that the Urban Reserve comply with the General Plan Housing Element by designating 10-percent of the total housing stock for participation in the affordable housing program, as defined in this section. Implementation of WMM 4.2-1 would reduce impacts to a **less than significant** level.

At the time future development is proposed in areas designated Urban Reserve, additional entitlements and environmental review would be required. Any future development would be required to meet the city's affordable housing goals, thereby avoiding any adverse physical consequences that could result from noncompliance. Therefore, the impact would be **less than significant**.

IMPACT 4.2-3	DISPLACEMENT OF EXISTING HOUSING	
Applicable Policies and Regulations	None	
	SVSP	Urban Reserve
Significance with Policies and Regulations	Less Than Significant	No Impact
Mitigation Measures:	None Required	None Required
Significance after Mitigation:	Less Than Significant	No Impact

SIERRA VISTA SPECIFIC PLAN

Three existing residences in the SVSP would be displaced by proposed development. The number of persons who could be potentially displaced by the proposed development is extremely small. In addition, development is expected to occur over a twenty-year time frame, therefore, the

residences may no longer be occupied at the time development occurs. Therefore, this impact would be considered **less than significant**.

URBAN RESERVE

There are no existing housing units in the Urban Reserve parcels. Therefore, the project would not displace any residential uses. No development is proposed in the Urban Reserve parcels. Therefore, no residences would be displaced by implementation of the SVSP. **No Impact**.

MPACT 4.2-4	INDUCEMENT OF SUBSTANTIAL POPULATION GROWTH	
Applicable Policies and Regulations	None	
	SVSP	Urban Reserve
Significance with Policies and Regulations	Significant	Significant
Mitigation Measures:	None Available	None Available
Significance after Mitigation:	Significant and Unavoidable	Significant and Unavoidable

SIERRA VISTA SPECIFIC PLAN

The proposed project includes 6,650 homes in the SVSP area. The new housing development could accommodate approximately 16,891 additional persons. This represents a 13.8% increase in the City’s population due to the proposed SVSP, which is considered **significant**. The existing General Plan projects a total of 58,224 residential units. With SVSP the total number of units in the City of Roseville would be 64,874. The inclusion of commercial and business professional uses would generate approximately 7,500 additional jobs. While most of these jobs would be held by City of Roseville residents, it would be anticipated that workers would also be drawn from work forces outside of Roseville. As discussed earlier, under CEQA, a lead agency should not assume that growth in an area is necessarily beneficial or of little significance environmentally. (CEQA Guidelines, § 15126.2, subd. (d)). As a result, the prospect of growth, by itself, does not translate into an adverse effect on the environment. Instead, growth may result in physical impacts to

various kinds of natural or environmental resources, such as air, water, or land. For these reasons, the project's growth-inducing effects are **significant and unavoidable**. The project's impacts to specific natural or environmental resources are dealt with in other chapters.

URBAN RESERVE

While no development is proposed as part of the project at this time, annexation to the City of Roseville, with the extension of infrastructure, and services, increases the likelihood that the program-level parcels will develop in the future. Buildout of the parcels would result in increased residences and commercial opportunities. As noted above, however, the prospect of growth, by itself, does not translate into an adverse effect on the environment. Instead, growth may result in physical impacts to various kinds of natural or environmental resources, such as air, water, or land, all of which are dealt with separately in other chapters in this document. Regardless of whether or not workers commute to the City or whether current Roseville residents occupy the new jobs created in the Urban Reserve area, population growth would be significant. Therefore, this would be a **significant unavoidable** impact.

4.2.5 MITIGATION MEASURES

The project area was included in the program-level analysis of the West Roseville Specific Plan Final EIR. Mitigation adopted by the City Council at time of approval in 2004 is still applicable to the project, especially to the Urban Reserve areas. The following includes the WRSP mitigation as "WMM" and provides ~~strikeout~~ to language that is being eliminated or underline to denote new language.

WMM 4.2-1

Affordable Housing Program (Impact 4.2-2 Urban Reserve)

Specific plans and/or other development proposals for the ~~Remainder~~ Area Urban Reserve Area shall demonstrate that 10 percent of the exact dwelling unit counts would be reserved for very low-, low- and moderate – income levels.

Consistent with City policy, at the time specific development is proposed within the Urban Reserve, a minimum of ten percent affordable units will be required.

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