

4.2 POPULATION AND HOUSING

4.2.1 INTRODUCTION

This section describes the anticipated changes in population and housing, including the jobs-to-housing balance and affordable housing, resulting from development of the proposed project. Impacts associated with growth inducement are also 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*, Second Quarter 2010
- *Sacramento Area Council of Governments Final Regional Housing Needs Plan*, adopted February 2008
- *City of Roseville General Plan Housing Element*, adopted August 2009.
- *Draft Creekview Specific Plan*, 2010

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 related to population and housing were received 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

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, collectively constitute the Sacramento Area Council of Governments (SACOG), which 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 was 348,522 in 2009¹.

City of Roseville Population

From 2000 to 2008 the City of Roseville's population increased from 79,921 to 109,437², an addition of 29,516 persons or 37% increase. Roseville's population as of January 1, 2010 is estimated to be 115,781³.

**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 U.S. Census Bureau website, August 9, 2010

² California State Department of Finance

³ City of Roseville Office of Economic Development

Employment

Regional Employment

Although the economy has dramatically slowed over the past several years, the Sacramento MSA economy continues to grow, as non-agricultural employment increased throughout the region. Job growth over the last ten years 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.⁴ In 2008, Placer County had a total labor force of approximately 174,028.

City of Roseville Employment

With approximately 74,000 jobs in 2008 (a 5% decline over the previous year)⁵, Roseville employment represented 42% 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 household⁶, there will be approximately 79,734 employed residents in 2025 (based on 2025 projected dwelling units of 63,281).

⁴ U.S. Census FactFinder Placer County, 2005-2007 Narrative, accessed February 9, 2009.

⁵ Karen Garner, personal communication, City of Roseville Office of Economic Development, May 2009.

⁶ Based on 2000 Census data.

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 37% increase over the 2000 supply. Nearly 80% of housing units were single family residences.

City of Roseville

As of August 2010, there were 47,960 dwelling units in the City⁷. The General Plan land use allocation provides for a total of 64,294 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 15,321 units, with a majority in the West Roseville and Sierra Vista Specific Plan areas. Based on City growth projections, it is expected that the current residential land use allocation will be exhausted by 2025. Despite the current economic slow down, the number of new housing units in Roseville grew by 2.66% over the last year.

Approximately 66% of the residential units in Roseville are low density residential homes. Medium and high-density residential construction has increased substantially since 2000 from 16%, to approximately 33% of the homes in Roseville in 2009.

⁷ Quarterly Development Activity Report, City of Roseville Planning Department, July 2010.

TABLE 4.2-2
SUMMARY OF ROSEVILLE HOUSING UNITS
AS OF OCTOBER 1, 2010

Residential Land Use	Allocated Units	Developed Units	Undeveloped Units
Low Density Residential	41,109	34,078	7,031
Medium Density Residential	8,809	4,830	3,979
High Density Residential	16,596	9,293	7,303
Total	66,514	48,201	18,313

Source: City of Roseville 3rd Quarter, Quarterly Development Activity Report plus allocated land use from the Sierra Vista Specific Plan approved by the City in May 2010.

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 publishes this information annually. In 2010, the median housing price for existing single-family homes and

condominiums in Placer County had dropped substantially to \$289,000, from a high of \$515,000 in 2005.⁸

TABLE 4.2-3
2010 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	\$15,360	\$25,600	\$40,950	\$51,200	\$61,440
2	\$17,550	\$29,250	\$46,800	\$58,500	\$70,200
3	\$19,740	\$32,900	\$52,650	\$65,800	\$78,960
4	\$21,930	\$36,550	\$58,500	\$73,100	\$87,720
5	\$23,700	\$39,500	\$63,200	\$79,000	\$94,800
6	\$25,440	\$42,400	\$67,900	\$84,800	\$101,760

Source: Published by HUD May 20,2010. Sacramento MSA includes Placer, El Dorado and Sacramento Counties.

In order to address the need for affordable housing, a Regional Housing Needs Allocation Plan was developed by SACOG. This plan allocates housing needs to each local jurisdiction for a seven and one-half year period. The current allocation was assigned for the years 2006-2013. Roseville is required to allocate 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 the City to provide appropriate zoning for a total of 7,120 housing units from 2008-2013.

⁸ Cyberhomes.com, August 11, 2010.

TABLE 4.2-4
ADJUSTED REGIONAL HOUSING NEEDS ALLOCATION
FOR ROSEVILLE 2008-2013⁹

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 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.

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.

⁹ Derived from City of Roseville Housing Element of the General Plan, adopted August 2009. Adjustments were made for actual housing production documented for 2006 and 2007.

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 not assume that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. (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

This section addresses the population and housing impacts of the proposed project as determined by analyzing any changes from the existing physical conditions. For a discussion of cumulative impacts on population and housing, refer to Chapter 5, *CEQA Considerations*.

Population

The increased population in Roseville resulting from the proposed development of the CSP area is estimated by multiplying the total number of proposed residential units by the average number of residents per dwelling unit in Roseville which is estimated to be 2.54 persons per household based on the City's average estimates for the past five years. The 2,011 new residential units proposed as part of the CSP would generate an estimated population of 5,108 persons.

Employment

The additional jobs that could result from the development of the CSP are calculated based upon the types of commercial development proposed and the estimated amount of floor area of each commercial development. The assumed floor area ratio (FAR) is 0.20 for commercial/retail. According to the specific plan, the project would accommodate approximately 190,000 square feet of retail and office uses, which would generate approximately 445 jobs.

Housing

As stated above, the CSP would add approximately 2,011 residential units to the City's residential housing stock. The analysis below discusses the affordability of the City's housing supply and the affordable housing that would be provided as part of the CSP development.

Thresholds of Significance

The following thresholds of significance have been used to determine whether implementing the proposed project would result in a significant population and housing impact. These thresholds of significance are based on Appendix G of the State CEQA Guidelines and professional judgment. For purposes of this EIR, a significant impact would occur if implementation of the proposed project would do any of the following:

- Induce substantial population growth in an area, either directly (for example by proposed new homes and businesses) or indirectly (for example 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 significant physical effects on the environment related to population and housing, in preparing this DEIR, the City 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 be a physical environmental effect.

IMPACT 4.2-1	SIGNIFICANT CHANGE IN THE JOBS/HOUSING BALANCE	
Applicable Policies and Regulations	City of Roseville General Plan	
	CSP	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

CREEKVIEW SPECIFIC PLAN

As of August 2010, there were 47,960 dwelling units in the City. Approximately 60,430 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 were an estimated 1.58 jobs per housing unit in 2008.

The CSP would be expected to provide 2,011 housing units, which could accommodate approximately 2,534 additional workers, based on an average of 1.26 workers per unit. Citywide, including build-out of the CSP, there would be more than 81,500 jobs (current jobs, plus 445 jobs projected to be created in the CSP area). Citywide there are 837.92 acres of land designated non-residential (commercial, business professional, and central business district), and 1,547.32 acres of industrial zoned parcels remaining to be developed within the City limits. The projected employable population would be 86,542¹⁰ at build-out of the City (plus the CSP area); hence, there would still be more jobs than housing units needed to accommodate City of Roseville workforce within the city limits.

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

¹⁰ Based on 68,684 housing units, with 1.26 workers per household

URBAN RESERVE

It is unlikely that urban development of the Urban Reserve would include commercial and business professional uses. 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	
	CSP	Urban Reserve
Significance with Policies and Regulations	Less Than Significant	Significant
Mitigation Measures:	None Required	WMM 4.2-1 Affordable Housing Program
Significance after Mitigation:	Less Than Significant	Less Than Significant

CREEKVIEW SPECIFIC PLAN

Although CEQA case law has held that a project's tendency to increase the demand for affordable housing is not an environmental effect, but rather is an economic or social effect outside the purview of CEQA (see *San Franciscans for Reasonable Growth v. City and County of San Francisco* [1988] 209 Cal.App.3d 1502, 1521-1522, fn. 13), this discussion is nevertheless included herein in order to provide the public and City decision-makers with information relevant to consideration of the proposed project.

The City's General plan Policy HB-3 requires 10% of all new housing built to be affordable. The CSP would add 2,011 dwelling units to the City's housing stock, of which 201 must be affordable units. In addition, of the total units created by the CSP, approximately 25% would be zoned high-density residential (HDR), which provides opportunities for affordable housing.

TABLE 4.2-5

AFFORDABLE UNITS PROPOSED IN THE CSP

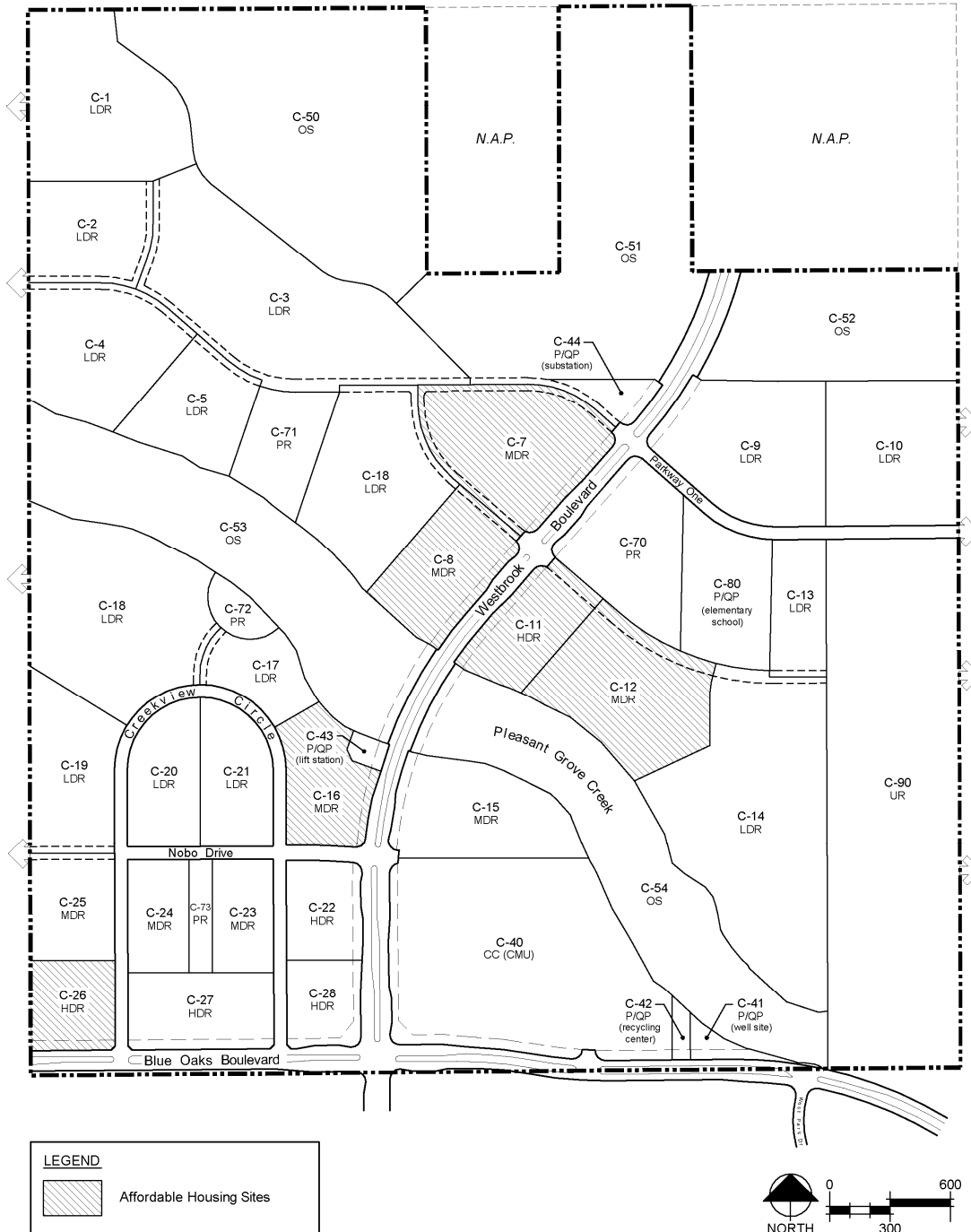
Income Category	Units Required to Meet Goal	Percentage of Affordable Housing Units
Very-low Income	81	40%
Low-Income	80	40%
Middle-Income	40	20%
Total Affordable Housing	201 (10% of 2,011)	100%

As discussed in the Section 4.2.2 and Table 4.2-4, the RHNA requires that the City of Roseville provide planned and zoned land sufficient to accommodate 7,120 housing units during the current RHNA planning period (2008-2013). This allocation exceeds the number of housing units planned in the CSP. Further, the RHNA requires the zoning for 4,386 high density residential units, which far exceeds 50% of the CSP 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 (water, traffic, police and fire response). 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 CSP specifically includes housing sites zoned to accommodate 30 dwelling units/acre, consistent with state standards, which will be required during the next planning period (2013 – 2020). While it would not accommodate 100% of the City’s RHNA obligation, the CSP would substantially increase the

FIGURE 4.2-1

AFFORDABLE HOUSING LOCATIONS



City's ability to identify sites to meet its obligation for high density residential zoning which could accommodate lower income households. Hence the CSP, helps rather than hinders the City in its efforts to meet its "fair share" obligations.

The CSP would add 2,011 new units. The CSP would comply with the General Plan Housing Element by designating 10% of the total CSP 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 (40 units). Eighty percent of the affordable units would consist of rental units for very low- and low-income households (80 low income and 81 very low income, or 40% each). Affordable units would be dispersed throughout the neighborhoods; as described in Table 4.2-6 and illustrated in Figure 4.2-1 (Affordable Housing Locations).

**TABLE 4.2-6
AFFORDABLE HOUSING BY PARCEL**

Parcel	Land Use	Total Units in Parcel	Total Affordable Allocation	Very Low Income Rental	Low Income Rental	Middle Income Purchase
C-20	MDR	75	10			10
C-22	MDR	105	20			20
C-30	MDR	40	10			10
C-42	HDR	220	161	81	80	
Total			201	81	80	40

The total number of affordable units would be 201 which is 10% of the total number of proposed dwelling units. Because the number of affordable housing units would be 10%, the project is consistent with the City policy and consistent with General Plan goals related to the provision of housing opportunities, including affordable housing. Therefore, the impact would be **less than significant**.

URBAN RESERVE

If developed in the future the Urban Reserve parcel would add additional housing units to the City. Consistent with City policy 10% 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. For purposes of determining impacts, approximately 405 residential units could be accommodated in the Urban Reserve if it is developed similar to the proposed CSP. Approximately 40 units would need to be affordable. This could be a **significant** impact.

Previously adopted WMM 4.2-1 *Affordable Housing Program* requires that the Urban Reserve comply with the General Plan Housing Element by designating ten-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	
	CSP	Urban Reserve
Applicable Policies and Regulations	None	
Significance with Policies and Regulations	Less Than Significant	No Impact
Mitigation Measures:	None Required	None Required
Significance after Mitigation:	Less Than Significant	No Impact

CREEKVIEW SPECIFIC PLAN

One existing residence in the CSP area is a rental unit, would be displaced by the proposed CSP development. The number of persons who could be potentially displaced by the proposed development is extremely small. In addition, 2,011 new residential units would be built, 10% of which must be affordable. Therefore, this impact would be considered **less than significant**.

URBAN RESERVE

One existing housing unit is located on the Urban Reserve parcel. No development is proposed at this time and this residence could remain even if the property were developed. Therefore, no residences would be displaced by implementation of the CSP. **No Impact**.

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

CREEKVIEW SPECIFIC PLAN

The proposed project involves construction of 2,011 new residential units in the CSP area. This new housing could accommodate approximately 5,108 additional persons. This represents a three percent increase in the City’s population, which is considered **significant**. The existing General Plan projects a total of 64,294 residential units. With the CSP the total number of units in the City of Roseville would be increased by 2,011 and would require a General Plan amendment which is part of the proposed project. The commercial and business professional uses proposed in the CSP would generate

approximately 445 additional jobs. While most of these jobs would be held by City of Roseville residents, it would be anticipated that workers would also live outside of Roseville. As discussed earlier, under CEQA, a lead agency should not assume that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. (CEQA Guidelines, §15126.2, subd. (d).). As a result, the prospect of growth, by itself, does not create 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 impacts of this growth on specific natural or environmental resources are analyzed in other sections of this EIR.

URBAN RESERVE

While no development is proposed for the Urban Reserve parcel at this time, annexation of the property to the City of Roseville, along with the extension of infrastructure, and services, increases the likelihood that the Urban Reserve will develop in the future. Buildout of the parcels would result in increased residences and commercial development. As noted above, however, the prospect of growth, by itself, does not create 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 sections of this EIR. Regardless of whether or not workers commute to the City or whether current Roseville residents occupy any new jobs created in the Urban Reserve area, population growth would be significant. Therefore, this would be a **significant and unavoidable** impact.

4.2.5 MITIGATION MEASURES

The CSP 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 refers to WRSP mitigation measures as "WMM" and will show either ~~strikeout~~ for language that is being eliminated or underline to denote new language, as applicable.

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.