

City of West Covina



2021-2029 Housing Element

City Council Resolution No. 2022-110

November 15, 2022

with technical revisions December 21, 2023



City of West Covina

2021-2029 Housing Element

Adopted November 15, 2022

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Acknowledgements

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Section 1

Introduction

1.1 Housing Element Purpose

California state law requires every jurisdiction to adopt a General Plan. The Housing Element is one of the seven required elements of the West Covina General Plan that establishes policies, procedures and incentives to adequately accommodate the housing needs of households currently living or expected to live in West Covina over the 2021-2029 period. Meeting current and projected needs ensures that West Covina can accommodate its share of the Regional Housing Needs Allocation (RHNA). The Housing Element identifies strategies and programs that focus on the preservation and improvement of housing and neighborhoods, providing adequate housing sites, assisting in the provision of affordable housing, removing governmental and other constraints to housing investment, and promoting fair and equal housing opportunities. These strategies address the statewide housing goal of “early attainment of decent housing and a suitable living environment for every Californian.”

Specific requirements for data collection and analysis necessary to prepare the Housing Element are set forth in Government Code Section 65583 and are discussed later in this document. The Government Code also requires that draft Housing Elements be reviewed by the California Department of Housing and Community Development (HCD) and that the Department’s findings be considered by the City prior to Housing Element adoption. The Housing Element utilizes recent data published by the U.S. Census Bureau, particularly American Community Survey estimates.

1.2 General Plan Consistency

The Housing Element is required to be updated every 8 years as mandated by California Government Code Section 65581. The goals, policies, standards, and proposals within this element relate directly to, and are consistent with, all other elements. The City’s Housing Element identifies programs and resources required for the preservation, improvement, and development of housing to meet the existing and projected needs of its population. The City’s General Plan must include land use, transportation, conservation, noise, open space, safety, and housing (elements can be combined or renamed as determined by the City). California Government Code Section 65583(c) requires the Housing Element to maintain internal consistency with other General Plan Elements. In addition to housing, the regulation of the amount and variety of open space and recreation areas, acceptable noise levels in residential areas, and programs to provide for the safety of the residents, policies contained in other General Plan elements directly affect the quality of life for all West Covina citizens.

The Housing Element is correlated with development policies contained in the Land Use Element, which establishes the location, type, intensity and distribution of land uses throughout the city, and defines the land use build-out potential. In designating land for residential development, the Land Use Element describes the types and location of housing units that may be constructed in the city. The acreage designated for a range of commercial and office uses creates employment opportunities for various income groups. The presence and potential for jobs affects the current and future demand for housing at the various income levels in the city.

The Circulation Element of the General Plan also affects the implementation of the Housing Element. The Circulation Element establishes policies for a balanced circulation system in the city. The element also provides policies for essential infrastructure to support housing development along with mitigating the effects of growth.

All elements of the General Plan bear equal weight, and no element has legal precedence over another. California Government Code Section 65583 (c) requires the Housing Element to maintain internal consistency with other General Plan Elements. The Housing Element has been reviewed for consistency with the City's other General Plan elements, and the policies and programs in this Element are consistent with the policy direction contained in other parts of the General Plan. As portions of the General Plan are amended from time to time, the Housing Element will be reviewed to ensure that internal consistency is maintained.

1.3 Citizen Participation

California law requires that local governments make a diligent effort to achieve public participation from all economic segments of the community in the preparation of the Housing Element. The public involvement process during the 2021-2029 Housing Element Update is described in Appendix C.

1.4 Housing Element Organization

This Housing Element is divided into the following sections and appendices:

- Section 1** **Introduction** providing an overview of the Housing Element
- Section 2** **Housing Plan** addressing West Covina's identified housing needs, including housing goals, policies, programs, and objectives
- Section 3** **Housing Needs Assessment** including an analysis of the city's population, household and employment base, characteristics of the housing stock, special housing needs, and an assessment of fair housing issues
- Section 4** **Housing Constraints** examining governmental and non-governmental constraints on the production, maintenance, and affordability of housing
- Section 5** **Housing Resources** presenting an inventory of potential housing sites, financial resources, and administrative capabilities

- Appendix A** Evaluation of the Prior Housing Element
- Appendix B** Sites Inventory
- Appendix C** Public Participation
- Appendix D** Fair Housing Assessment

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Section 2

Housing Plan

2.1 Introduction

This Housing Plan includes goals, policies, programs, and objectives to guide the development and preservation of a balanced inventory of housing to meet the needs of present and future residents of the city. The Housing Plan is organized into the following major themes:

1. Preservation of the City's existing housing stock;
2. Increased affordable housing opportunities;
3. Removal of constraints to the construction of housing opportunities;
4. Affirmatively furthering fair housing;
5. Identification of adequate sites to achieve a variety and diversity of housing.

For each of the goals identified, specific policies, programs and objectives are described. It should be noted that the successful implementation of many of these programs will be dependent on the availability of sufficient financial resources provided by other governmental agencies or actions of other entities that are not under the City's control.

2.2 Goals, Policies, Programs and Objectives

Goal 1: Maintain and enhance the quality of existing housing and residential neighborhoods in West Covina.

Continued maintenance and preservation of the existing housing stock in West Covina is crucial to ensure quality neighborhoods. Housing programs focused on the achievement of this goal include rehabilitation of single- and multi-family housing units, code enforcement, and efforts to preserve assisted housing units that may be at risk of converting to market-rate housing. Through code enforcement, neighborhood, and home improvement programs, the City is able to maintain the condition of existing housing units.

Policy 1.1: When available, provide financial assistance to rehabilitate dwelling units owned or occupied by seniors and low-income individuals.

Policy 1.2: Encourage citizen involvement in property maintenance and efforts to improve the housing stock and overall neighborhood quality.

Policy 1.3: Cooperate with non-profit housing providers in the acquisition, rehabilitation, and maintenance of older apartment complexes and single-family houses to be preserved as long-term affordable housing.

Policy 1.4: Continue to monitor affordable housing developments, second units, and vacant units within the city.

Policy 1.5: Preserve the existing affordable housing stock, including mobile homes, through the implementation of City regulations, on-going monitoring and the provision of financial assistance.

Policy 1.8: Continue to support the provision of rental assistance to lower-income households and encourage property owners to list units with the Housing Authority.

Policy 1.9: Promote housing that is developed exceeding Title 24 Standards of the California Building Code.

Programs

Program 1.1 – Housing Preservation

West Covina places a high priority on maintaining the quality of its housing stock. The Housing Preservation Loan Program (HPP) for moderate-income households provides residents with small loans of up to \$10,000 to complete a variety of home improvements including, but not limited to: room additions, handicap modifications, structural repairs, exterior enhancements, interior improvements, electrical and/or plumbing work. Homeowners can apply for loans of up to \$10,000; however approved loans are typically for smaller amounts allowing for more residents to take advantage of the program. An interest rate of 5 percent is applied by the City on loans made to residents.

Historically, the HPP was funded using Redevelopment Set-Aside funds; however, the elimination of the Redevelopment Agency has resulted in the loss of a permanent funding source for this program. For the 2021-2029 planning period the City will annually evaluate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information about the program at City Hall, on the City's website and in other public places to increase awareness and encourage applications.

Actions	Objective and Timeframe
<p>Action 1.1-a: Apply for local, State, and federal funding for the City's HPP. Assess the need for rehabilitation in the city and prioritize resources in the communities with older and substandard housing stock.</p>	<p>Assess rehabilitation needs in the identified priority areas in the city by December 2025. Apply for capital funding to address needs by June 2026.</p> <p>Provide zero percent interest loans for minor home repairs of 15 households per year during the 2021-2029 planning period for a total of 120 households during the planning period.</p> <p>Provide home repair program information with notice of code enforcement violations. By January 2025, provide information on the City's home repair program in all community centers and libraries and at City booths at public events, prioritizing areas of identified need. Starting in 2025, hold at least one workshop or pop-up booth annually in identified neighborhoods of need, for a total of four events during the planning period.</p>
<p>Action 1.1-b: Partner with community-based organizations to disseminate housing information and resources such as rehabilitation standards, preventative maintenance, and energy efficiency measures in various community locations, such as City Hall, libraries, and community centers. Include informational materials about the HPP. Conduct community workshops and post information onto the City's website and the City's newsletter, Discover West Covina.</p>	<p>Work with community-based organizations to produce educational materials and resources to distribute and post information to the City's website by December 2024.</p> <p>By January 2025, provide information on the City's home repair program in all community centers and libraries, and at City booths at public events, prioritizing areas of identified need (see Policy Action 2.2-a).</p>
<p>Action 1.1-c: Act to reduce Lead Based Paint Hazards and incorporate the appropriate actions (pursuant to the Lead-Based Paint Hazard Reduction Act of 1992) into all housing programs under the jurisdiction of the City. On a case-by-case basis, provide funds for the testing and mitigation of housing units for lead-based paint.</p>	<p>Assist in the reduction of lead-based paint hazards. Set aside HOME Access and ARPA Home Repair and Weatherization Program funds to abate Lead Based Paint Hazards.</p>

Responsible Agency: West Covina Community Development Department, Community and Economic Development Division

Potential Funding Sources: CDBG funds, Additional funding sources needed.

Program 1.2 – Monitor and Preserve Affordable Housing

West Covina currently has two affordable housing projects with 96 deed-restricted units that could expire during the next 10 years. The City will work cooperatively with property owners and applicable entities to facilitate the preservation of these affordable units to the extent feasible.

Actions	Objective and Timeframe
<p>Action 1.2-a: Monitor the status of the 96 units at risk of conversion to market-rate units published in the Risk Assessment report published by the California Housing Partnership Corporation and seek to preserve these affordable units for extremely low-income households and very low-income households.</p> <p>Work with the owners of existing affordable housing with expiring affordability covenants that are scheduled for conversion to discuss the City's desire to preserve affordable housing. Inform property owners of their obligation to comply with noticing requirements stipulated under state law to ensure that qualified non-profit entities from the state's qualified entities list are informed of the opportunity to acquire the affordable property and that tenants are informed about their rights and potential resources.</p>	<p>Annually review Risk Assessment report published by the California Housing Partnership Corporation.</p> <p>At least three years prior to expiration of the regulatory agreement for at-risk units, meet with existing owner of property to discuss required actions under California law and seek solutions that allow for the preservation of the 96 at-risk regulated affordable housing units set to expire by 2033. Provide follow-up with owners of existing at-risk affordable housing one year and six months prior to conversion if property owner fails to respond.</p>
<p>Action 1.2-b: Work with owners of the 96 at-risk units to provide information to the tenants of these units regarding tenant's rights and conversion procedures pursuant to California AB 1521 (2017, Bloom) or other legal remedies. Provide tenants with tenant relocation assistance, free legal assistance, and other applicable services.</p> <p>Evaluate existing State and federal "just cause for eviction" and other similar legislation with provisions to determine if additional protections through a local ordinance is warranted.</p>	<p>At least 18 months prior to the expiration of the regulatory agreement for at-risk units, ensure that tenants understand their rights to remain in the units and that they receive information and referrals to resources.</p> <p>Annually collect reporting by consultant(s) and review data. If warranted, recommend adoption of a local ordinance by December 2026.</p>
<p>Action 1.2-c: Assess need for program to assist local property owners/managers operating multi-family rental housing in need of rehabilitation. The goal of this action is to preserve "naturally occurring affordable housing."</p>	<p>By December 2025, prepare needs analysis with goals and expected outcomes for program. If a need is determined, apply for public funding (e.g., HUD, State HCD) or allocate existing affordable housing funding (i.e., CDBG, HOME) for loan or grant resources that support this action biennially, beginning no later than December 2027, and provide outreach to at least five local property owners/managers by the end of the planning period.</p>
<p>Action 1.2-d: Maintain regular contact with the local HUD office regarding early warnings of possible opt-outs.</p>	<p>Meet annually with Los Angeles Field Office HUD office to discuss expiring affordability terms.</p>
<p>Action 1.2-e: Continue to enforce the Mobile Home Rent Control Ordinance to retain mobile home parks as a continued source of affordable housing in the City.</p>	<p>Annually review the Mobile Home Rent Control Ordinance and make any necessary changes to enhance its effectiveness.</p>

Responsible Agency: West Covina Community Development Department, Community and Economic Development Division

Potential Funding Sources: General Fund

Program 1.3 – Energy-Efficient Design

The City will review ordinances and recommend changes where necessary to encourage energy efficient housing design and practices that are consistent with state regulations. The City will periodically distribute literature or post information on the website regarding energy conservation, including solar power, energy efficient insulation, and subsidies available from utility companies, and encourage homeowners and landlords to incorporate these features into construction and remodeling projects. When possible, the City will encourage energy conservation devices including, but not limited to, lighting, water heater treatments, and solar energy systems for all new and existing residential projects. The City will encourage maximum utilization of federal, state, and local government programs, including the County of Los Angeles Home Weatherization Program, that are intended to help homeowners implement energy conservation measures. Additionally, as part of the Housing Preservation Loan Program, outlined above, residents can apply for loans to increase the energy efficiency of their home.

Actions	Objective and Timeframe
<p>Action 1.3-a: Encourage Developers to apply for funds to provide financial incentives for property owners to implement environmentally friendly building improvements in existing and new construction, such as solar panel installation and energy and water efficiency upgrades, induction cooking, and outdoor water conservation techniques, with priority given to units affordable to lower and moderate-income households.</p>	<p>Create a toolkit that connects property owners, including multi-family property owners, to funding to support energy and water efficiency upgrades by January 2026. Conduct outreach to at least 50 property owners annually beginning January 2027.</p>
<p>Action 1.3-b: Support infrastructure for public transit and active transportation such as walking and biking in areas designated for housing opportunities, prioritizing areas designated by TCAC as low resource areas. The infrastructure project priority checklist will designate funds for public transit and active transportation projects that prioritize communities and corridors in E Imperial Highway/S Harbor Boulevard, Artesia Boulevard/ N Gilbert Street, Gilbert Park, Rancho La Paz, Woodcrest Park, and areas listed in the Site Inventory that are designated for housing opportunity sites that can accommodate at least 30 units of affordable/low-income housing.</p>	<p>By January 2025, create an infrastructure project priority checklist and apply to updates of all transportation and infrastructure plans.</p>
<p>Action 1.3-c: Increase resident participation in programs designed to reduce household energy costs, particularly home weatherization programs and utility tax exemptions or discounts geared toward lower-income households. Promote GRID alternatives, use of Energy Star®-rated appliances, and energy service provider SCE to provide energy improvements, prioritizing resources for low- and moderate-income households and explore resources that provide financing for homeowners making energy and water efficiency improvements.</p>	<p>Beginning in 2025, hold at least four outreach events (workshops or pop-up events) during the planning period in identified priority neighborhoods (see Policy Action 1.1-a). Mail literature on resources for energy and water efficiency programs to all households at least once per year.</p>

Responsible Agency: West Covina Community Development Department, Planning Division

Potential Funding Sources: General Fund

Program 1.4 – Code Enforcement

Code enforcement is essential to ensuring housing preservation and rehabilitation. The City will undertake the enforcement of the Property Maintenance Ordinance, which is intended to preserve existing residential and nonresidential structures in attractive, safe, and sanitary conditions. The City will enforce, on a complaint or request basis, local zoning; housing, fire, and building codes; and standards for landscaping under its Community Enhancement Program to maintain safe and decent housing. Property owners with code violations who meet eligibility requirements for participation in the City’s Home Improvement Program will be offered an opportunity to correct code violations through financial assistance from the Program, when funds are available. The primary goal of the regulation is to provide reasonable controls for the maintenance, rehabilitation, preservation, and conservation of existing commercial and residential properties. The City anticipates that approximately \$100,000 of CDBG funding will be available annually to provide code enforcement assistance.

Actions	Objective and Timeframe
Action 1.4-a: Continue to implement the Community Enhancement program to bring substandard housing units into compliance with City building and property maintenance codes.	On an ongoing basis, provide homeowners and property owners information on the City’s HPP program when issuing code violations.
Action 1.4-b: Continue to provide annual harassment trainings from the California Joint Powers Insurance Authority during the 6 th Cycle Housing Element planning period to improve capacity of Code Enforcement Division staff to work with diverse communities, in a culturally competent manner with a focus on problem solving and with connections to social and economic support services.	Hold training annually during the planning period (at least five trainings).

Responsible Agency: West Covina Community Development Department, Code Enforcement Division

Potential Funding Source: Departmental Budget, CDBG funds

Goal 2: Provide a variety of housing types to accommodate all economic segments of the city.

West Covina strives to provide a variety of housing types, with housing units available for all income segments of the population. The existing housing stock offers many affordable options throughout the city. The intent of this goal is to assist in the provision of adequate housing to meet the needs of the community, including the needs of both renter and owner households.

Policy 2.1: Continue to participate in State and federally sponsored programs designed to maintain housing affordability, including the Section 8 Housing Choice Voucher program.

Policy 2.2: Continue to support non-profit and for-profit organizations in their efforts to construct, acquire, and improve housing to accommodate households with lower and moderate incomes.

Policy 2.3: Facilitate development of affordable housing through use of financial and/or regulatory incentives.

Policy 2.4: Provide high-quality housing for current and future residents at all income levels to achieve a balanced community.

Policy 2.5: Encourage the provision of housing to address the City's growing senior population, including design that supports aging in place, senior housing with supportive services, assisted living facilities, and accessory units.

Policy 2.6: Facilitate the provision of accessory dwelling units as a means of providing affordable rental housing in existing neighborhoods. Ensure compatibility with the primary unit and surrounding neighborhood.

Programs

Program 2.1 – Acquisition and Rehabilitation

One of the most significant barriers to affordable housing is the acquisition of the property on which to construct affordable housing. The City can assist in the provision of affordable housing by utilizing available funds to write down the cost of land for development of affordable housing. The City will encourage the acquisition and rehabilitation of existing, underutilized and substandard residential units and motels. As part of the land write-down program, the City may also assist in the acquiring and assembling property and in subsidizing on- and off-site improvements. The City will establish and maintain contacts with non-profits in the area to solicit interest in participating in programs and projects in West Covina. This program will contribute to the improvement of the City by providing affordable units, eliminating blighted properties, and encouraging private investment. During the previous planning period, the City partnered with the Regional Occupation Program to construct a single-family low-income unit. The City plans to continue its efforts to identify additional partnerships in the future.

The State's elimination of the City's Redevelopment Agency has resulted in a loss of a permanent funding source for this program. For the 2021-2029 planning period, the City will annually evaluate and investigate potential new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information about the program at City Hall, on the City's website and in other public places to increase awareness.

Actions	Objective and Timeframe
<p>Action 2.1-a: Proactively engage private and non-profit affordable housing developers to solicit interest in acquiring and converting existing and unregulated naturally occurring housing to long-term regulated affordable housing for low- and moderate-income households.</p>	<p>Hold at least one stakeholder forum with private and non-profit housing developers to solicit input on program elements, available sites, and funding opportunities by January 2025.</p>
<p>Action 2.1-b: Proactively engage and provide technical assistance to potential purchasers of at-risk units, including nonprofits, developers, and tenants of potentially converting affordable properties. Assist with funding as feasible and/or support funding application for acquisition and/or rehabilitation of units.</p>	<p>Establish a list of established and potential housing purchasers by December 2024. Contact potential purchasers of at-risk units to discuss affordability preservation at least one year prior to the expiration of at-risk units. Hold at least one stakeholder forum with private and non-profit housing developers to solicit input on available units and funding opportunities by June 2025.</p>

Responsible Agency: West Covina Community Development Department, Community and Economic Development Division

Funding Sources: New funding sources needed

Program 2.2 – Support Production of Affordable Housing

High construction and land costs and inadequacy of public affordable housing subsidies and burdensome regulations have created challenges to building new affordable housing. The City will work with developers to facilitate affordable housing development and seek to provide gap financing as a local match to State, federal, and other public funding sources. When possible, the City will utilize State, federal, and local funds to write down the cost of land for the development of affordable housing. State funding, such as the California Housing Finance Agency (CalHFA), provides financing programs that create safe, decent and affordable housing opportunities for low- and moderate-income Californians. CalHFA offers a variety of programs for multi-family developers to first time home buyers. The City will proactively explore and pursue funding opportunities from all sources annually in partnership with nonprofit developers and service providers, with priority for funding programs that target extremely-low-income units.

The City will also provide greater permit streamlining, fee reductions, and other possible measures and incentives to support affordable housing development. Where feasible, the City shall support the development of affordable housing units and provide first right of refusal to Community Housing Development Organizations (CHDOs) and other affordable housing developers in accordance with Government Code Section 54222. Additionally, the City will provide in-kind assistance and funding for qualified CHDOs to develop affordable housing.

Actions	Objective and Timeframe
<p>Action 2.2-a: Actively promote sites available for affordable housing development to potential developers, private and nonprofit organizations, and other interested persons and organizations through meetings with developers regarding development opportunities. Provide incentives and technical assistance to Community Housing Development Organizations (CHDOs) to acquire and construct affordable infill residential projects. Monitor incentives and the development potential achieved for each project. Monitor potential sites and promote them to CHDOs. Prioritize sites proximate to retail, services, and employment, and projects that provide connections to those uses.</p> <p>Proactively work with non-profit and community-based housing development organizations to provide assistance with application paperwork, pro formas, coordination with outside agencies, and other activities to aid housing developers in the funding process.</p>	<p>The City will maintain information on opportunity sites on its website on an ongoing basis and will hold a focus group session with local CHDOs at least once annually beginning in 2024 to identify existing and potential incentives, sites, development needs (e.g. infrastructure, funding) and opportunities for affordable housing development. Maintain current information on the development process, potential fee reductions, and density bonus on the City's website and publish informational bulletin by August 2024, and communicate available incentives to developers during development opportunity meetings.</p>
<p>Action 2.2-b: Promote CalHFA funding programs for affordable housing development to potential developers, private and nonprofit organizations, and other interested persons and organizations</p>	<p>Create informational materials about the CalHFA program at City Hall, on the City's website, in the City's newsletter (Discover West Covina) and in other public place to increase awareness.</p>
<p>Action 2.2-c: In compliance with recent updates to the Surplus Land Act (AB1255, 2019-Rivas; AB 1486, 2019-Ting), identify City-owned land for the development of affordable housing. If surplus properties are identified, pursue development via a competitive Request for Proposals or other processes.</p>	<p>Report on identified surplus land in Housing Element Annual Progress reports. Annually, assess the list of surplus sites and solicit development via a competitive RFP process or other forms of partnership such as land lease agreements.</p>
<p>Action 2.2-d: Adopt written policies and procedures for the City of West Covina Utilities Services Department that grants priority to proposed developments that include housing affordable to lower-income households pursuant to Government Code Section 65589.7.</p>	<p>Adopt written policies and procedures for the Utilities Department pursuant to Government Code Section 65589.7 by February 2024.</p>
<p>Action 2.2-e: Continue to promote the City's density bonus ordinance to encourage affordable housing for seniors and lower and moderate-income households by providing informational materials at City Hall, on the City's website and in other public places to increase awareness.</p>	<p>Develop marketing materials advertising the density bonus by June 2024. Make them available to interested developers in public places and on the City's website.</p>

Responsible Agency: West Covina Community Development Department

Potential Funding Source: General Fund

Program 2.3 – Tenant Protections and Support

As the cost of housing increases, low-income renters and other vulnerable populations are disproportionately at risk of displacement. Displacement could result directly from development (and removal of lower cost housing) or indirectly from rising rents, evictions, Notices to Vacate, condominium conversions, and other activities which result in tenants losing their homes.

Los Angeles County Development Authority (LACDA) offers a variety of housing assistance programs that can supplement the City’s current housing programs. These programs include:

- Mortgage Credit Certificate Program (MCC),
- Home Ownership Program (HOP),
- First Home Mortgage Program,
- Section 8 Housing Choice Vouchers,
- Multi-Family Bond Program,
- Multi-Family Rental Program,
- Single-Family Grant Program (SFGP), and
- Single-Family Rehabilitation Loan Program.

LACDA currently administers the Section 8 Rental Assistance program on behalf of the City. Based on future congressional appropriations, the LACDA will apply for additional funding, which will enable it to administer additional certificates for families, elderly, and persons with disabilities over the 2021-2029 planning period. The City will continue to provide referral services and information to the city’s residents.

Actions	Objective and Timeframe
<p>Action 2.3-a: Collaborate with LACDA and promote the Section 8 voucher program to landlords and residents with the goal of increasing the number of vouchers used. Connect affordable housing developers to Project-Based Section 8 vouchers when they are available to their developments in West Covina.</p>	<p>Establish a list of housing developments supportive of utilizing Section 8 vouchers and coordinate with LACDA for placement of tenants.</p>
<p>Action 2.3-b: In collaboration with LACDA, provide education to property owners and managers to expand awareness of the Housing Choice Voucher program to increase acceptance of tenant-based Housing Choice Vouchers and to facilitate mobility and provide choices for lower-income households throughout the city. Identify and address challenges that property owners/managers have with existing or prospective Section 8 voucher holders.</p>	<p>Beginning 2025, annually conduct one workshop for tenants and one workshop for landlords in multiple languages, for a total of four workshops during the planning period, to be held virtually and/or in person in the City Council chambers. Target citywide property owners to assist in the opportunity for families to live in school districts near schools or near employment opportunities.</p>
<p>Action 2.3-c: Evaluate existing state and federal “just cause for eviction” (AB 1482; 2019-Chiu) and other similar legislation to determine if additional protections through a local ordinance is warranted.</p>	<p>In consultation with fair housing service providers and community-based organizations, assess if additional protections are needed, by January 2026. If warranted, recommend adoption of a local tenant protection ordinance to City Council by December 2026.</p>

Actions	Objective and Timeframe
<p>Action 2.3-d: Prepare needs assessment report on the development of a rental assistance program to fill any gaps between Section 8 assistance and rent, or to aid those who may not qualify for Section 8 but need one-time emergency assistance, to provide relief to tenants to avoid the displacement in vulnerable communities. Report will compare similar programs in other cities and feasibility of funding sources, including HOME and CDBG.</p>	<p>Prepare and present a report on development of a rental assistance program to the City Council by January 2026, including recommendations for policy actions that would provide relief to tenants and landlords to avoid the displacement in vulnerable communities. If a rental assistance program is approved and implemented as a result, the program will assist at least 15 lower income renter households annually.</p>

Responsible Agency: Community Development Department and Public Services Department

Potential Funding Source: General Fund

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.

Market factors and governmental regulations may at times constrain the development of adequate and affordable housing. These factors tend to disproportionately impact lower- and moderate-income households due to their limited resources. The City is committed to removing governmental constraints that hinder the production of housing and offers a “one-stop” streamlined permitting process to facilitate efficient entitlement and building permit processing. The Zoning Code was updated to reduce constraints to the development of a variety of housing types. The updated code was adopted on January 16th, 2024.

- Policy 3.1:** Support innovative public, private and non-profit efforts toward the development of affordable housing.
- Policy 3.2:** Periodically review and revise the City’s development standards, if necessary, to facilitate quality housing that is affordable to all income levels.
- Policy 3.3:** When feasible, consider reducing, subsidizing, or deferring development fees to facilitate the provision of affordable housing.
- Policy 3.4:** Continue the provision of incentives, including the density bonus incentive program, which encourages developers to include affordable units in their projects.
- Policy 3.5:** Encourage production of accessory dwelling units as an additional source of infill housing opportunities.
- Policy 3.6:** Identify funding to subsidize land costs of for housing developments that include affordable units.
- Policy 3.7:** Provide flexibility in development standards to accommodate alternative approaches to provide affordable housing such as mixed-use projects.

Programs

Program 3.1 – Review and Update the Development Review Process

The City must regularly evaluate and update its development review and permitting policies, standards, and practices in response to State and federal laws intended to facilitate residential development, particularly affordable housing development. The City also takes into consideration the needs and desires of the community as it undertakes such policy updates.

Under some circumstances development applications may be eligible for “streamlined ministerial review” such as pursuant to SB 35 (Government Code §65913.4). Qualifying projects are subject to specified procedures and development standards intended to simplify and expedite the development process.

In compliance with transparency requirements, all zoning, development standards and fees will continue to be posted on the City website and other public places and updated on an annual basis as necessary to reflect any changes.

Actions	Objective and Timeframe
<p>Action 3.1-a: Monitor average processing times for new housing projects and use data on processing times and applications to track review times and trends in citywide development and affordable housing developments. Assess the existing permit application and review process to streamline development projects where possible, prioritizing multi-family and affordable housing development.</p>	<p>The City will review processing times, and if necessary, develop recommendations to streamline the process by January 2025.</p>
<p>Action 3.1-b: Offer free Pre-Application Review process for development applicants.</p>	<p>The City will develop and implement a standard Pre-Application Review process by January 2025.</p>
<p>Action 3.1-c: Review the City’s permit process to ensure compliance with AB 2011 which allows for ministerial, by-right approval for affordable housing on commercially zoned lands, and allows such approvals for mixed-income housing along commercial corridors, as long as the projects meet specified affordability, labor, and environmental criteria.</p>	<p>The City will review the permit process for compliance with AB 2011 by July 2024. Complete and release AB 2011 project checklist by July 2025.</p>
<p>Action 3.1-d: Seek opportunities to streamline the CEQA review process by utilizing exemptions or tiering, particularly for infill development, consistent with State law.</p>	<p>The City will review CEQA streamlining standards and codify streamlining standards into the Zoning Code by December 2024.</p>
<p>Action 3.1-e: Monitor regulations, ordinances, processing procedures, and residential development impact and permit fees to assess impacts on housing development.</p>	<p>At least every two years, monitor regulations, ordinances, processing procedures, and residential development fees and make recommended changes within one year.</p>

Responsible Agency: Community Development Department

Potential Funding Source: General Fund

Program 3.2 – Accessory Dwelling Units

Allowing for the development of accessory dwelling units (ADUs) offers an important affordable housing option for lower-income households and others such as seniors, caregivers, or young adults. ADUs can also provide property owners with an additional source of income. Recent changes to State law encourage ADU production. The City amended local ADU regulations in 2020 in conformance with State law. The City has addressed the Department of Housing and Community Development’s February 2022 ADU Ordinance comment letter and has made applicable revisions to the ADU regulations. The City will continue to monitor legislation and update City ADU regulations as necessary to ensure consistency with State law.

In addition, the City will incentivize and promote ADU development in the following ways:

- Assist property owners with ADU applications
- Post informational ADU flyers in City Hall, on the Planning Department website and other public places
- Explore and pursue ADU funding assistance annually
- Modify development standards
- Reduce fees beyond what is required by State law
- Provide pre-approved ADU plans

Actions	Objective and Timeframe
<p>Action 3.2-a: Monitor ADU production and affordability levels on an annual basis to ensure that they are satisfying the construction targets adopted to meet RHNA obligations. Encourage equitable distribution of ADU development throughout the city through targeted outreach. Monitor review times for ADU and JADU permit applications and streamline permit review. The City will implement additional actions to promote the construction of ADUs depending on the severity of the gap including:</p> <ul style="list-style-type: none"> • Implementing incentives such as a no-interest loan program for ADU owners to rent to low or moderate-income residents. • Establishing relationships with and promote availability of area ADU technical assistance to loan providers. 	<p>Promote the development of ADUs with a goal of issuing building permits to 328 ADUs during the planning period (or 41 ADUs permitted per year).</p> <p>The City will review permit processing times for ADUs by January 2025 and implement any needed streamlining actions by January 2026. Monitor production and affordability levels on an annual basis. If the City is not trending to meet its target by January 2026, modify or develop new incentives to promote ADU development by July 2026.</p>
<p>Action 3.2-b: Develop a virtual 15-minute ADU permit meeting for applicants to streamline the permit process.</p>	<p>Implement ADU permit meeting process by December 2024.</p>
<p>Action 3.2-c: Assist and educate homeowners by posting pre-approved ADU/JADU Standard Plans in English and Spanish on the City’s website by January 2025.</p> <p>Update City website by January 2024 to provide link to California Housing Finance Agency (CHFA) ADU program that provides \$40,000 in grant for predevelopment costs to income-eligible property owners.</p>	<p>Update website by January 2024 with resources and post ADU/Junior ADU Standard Plans by January 2025.</p>

Responsible Agency: West Covina Community Development Department, Planning Division

Potential Funding Sources: Departmental Budget

Goal 4: Promote equal housing opportunity for all residents.

To fully meet the community's housing needs, the City must promote housing accessibility for all residents, regardless of age, race, religion, family status, or physical disability. The City attempts to achieve this through reasonable accommodation and through a partnership with the Housing Rights Center.

Policy 4.1: Continue to enforce fair housing laws prohibiting discrimination in the building, financing, selling, or renting of housing on the basis of race, ethnicity, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.

Policy 4.2: Promote greater awareness of tenant and landlord rights and obligations.

Policy 4.3: Provide that displacement of low-income households is avoided and, where necessary, is carried out in an equitable manner.

Policy 4.4: Encourage housing construction or alteration to meet the needs of residents with special needs such as large families, the elderly and persons with disabilities.

Programs

Program 4.1 – Fair Housing

The City will continue affirmatively further fair housing through the following meaningful actions: contract with the Housing Rights Center to provide residents with fair housing services using Community Development Block Grant (CDBG) funds. Fair housing services provided by the Housing Rights Center include counseling and mediation between tenants and landlords. The Housing Rights Center also conducts seminars and information activities throughout the region. The City will refer fair housing complaints to the Housing Rights Center as appropriate. The City will assist in program outreach through placement of fair housing program brochures in both English and Spanish at the public counter, City library, post office, and other community locations such as the City's senior center.

Actions	Objective and Timeframe
<p>Action 4.1-a: Partner with the Housing Rights Center to provide fair housing services and education.</p> <ul style="list-style-type: none">• Provide informational seminars to area residential real estate agents and brokers on fair housing laws and regulations.• Work with tenants and tenant advocates to identify violations of fair housing federal and State fair housing laws and support prospective and existing tenants who are experiencing discrimination.• Provide trainings for property owners/managers on the requirements of federal and state fair housing laws to prevent discrimination.	<p>Beginning January 2025, contract with the Housing Rights Center to provide training to at least 5 real estate agents and brokers annually and at least 5 property owners annually.</p> <p>Assist at least 50 residents and landlords with fair housing services annually.</p> <p>Report the number of complaint-based testing efforts and number of resulting complaints filed with HUD or California Civil Rights Department (CRD) annually.</p>

Actions	Objective and Timeframe
<p>Action 4.1-b: Expand information and referral services that direct families and individuals to financial resources for housing rental or purchase, locating suitable housing, and obtaining housing with special needs facilities such as disabled-accessible units.</p>	<p>Beginning January 2025, hold at least four informational events during the planning period to disseminate informational materials or provide training to residents.</p>
<p>Action 4.1-c: Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and Limited English Proficiency households. Plans should ensure collaboration with community groups, including faith-based and nonprofit organizations, to provide outreach on housing resources to all types of households and those households with Limited English Proficiency.</p>	<p>For the City's affordable housing programs (e.g., Home Improvement Loan Program) create a Fair Housing Marketing Plan and review every two years to ensure compliance.</p>
<p>Action 4.1-d: Promote fair lending practices throughout the city. Ensure that low-income residents have fair access to capital resources needed to acquire and maintain housing. Prevent predatory lending through information and referrals.</p>	<p>Annually conduct and publish third party review of city or regional HMDA data to identify areas of need regarding fair access to lending.</p>
<p>Action 4.1-e: With the Housing Rights Center, support an annual Fair Housing Audit Report that assesses typical or timely market-based suspected areas of discrimination.</p>	<p>Consult with the Housing Rights Center to review methodology for a Fair Housing Audit by January 2025.</p>
<p>Action 4.1-f: Create a Language Access Plan based on HUD guidelines and publish on the City's website: The goal of the Language Access Plan is to survey, maintain and publish a list of multi-lingual staff-capacity at City Hall so that staff may respond to the needs of Limited English Proficiency households.</p>	<p>Create and publish a Language Access Plan by January 2026.</p>
<p>Action 4.1-g: Fair Lending: Work to promote fair lending practices throughout the city:</p> <ul style="list-style-type: none"> • Ensure that low-income and minority residents have fair access to capital resources needed to acquire and maintain housing. <p>Prevent predatory lending through information and referrals to the Fair Housing Foundation.</p>	<p>Annually conduct and publish third party review of City or regional HMDA data to identify areas of need regarding fair access to lending.</p>
<p>Action 4.1-h: Add information on fair housing laws and resources on the City's website regarding housing programs in several languages. Post fair housing information at the Senior Center. Publish links to fair housing information via social media.</p>	<p>Updated website content with updated information on fair housing services and programs by January 2025.</p> <p>Conduct a presentation every two years at the Center about services available through the County CDC, Housing Rights Center and the City.</p>
<p>Action 4.1-i: Seek opportunities to expand outreach and public education strategies on available tenant protection and fair housing services to reach vulnerable households by offering information in multiple languages, targeted social media efforts, combining information with other assistance programs, distributing resources through local schools and colleges, and partnering with community-based organizations.</p>	<p>Partner with three new schools or community-based organizations during the planning period to disseminate materials and provide trainings to residents.</p>
<p>Action 4.1-j: Coordinate with non-profit organizations and employment-related organizations, such as teachers' associations, school districts, and community-based service providers to provide educational seminars on housing resources and financial planning to increase housing mobility.</p>	<p>Provide housing resources and financial planning seminars to at least 50 residents annually.</p>
<p>Action 4.1-k: Increase participation in homeownership education and assistance programs for historically underrepresented residents in the homeownership market.</p>	<p>Increase participation in homeownership education and outreach programs by minority and/or low- and moderate-income residents by 25 percent by 2028.</p>

Responsible Agency: West Covina Public Services Department
Potential Funding Source: Departmental Budget; Community Development Block Grants

Program 4.2 – Housing for Persons with Special Needs

Reasonable accommodation provides a basis for residents with disabilities to request flexibility in the application of land use and zoning regulations or, in some instances, a waiver of certain requirements from the local government to ensure equal access to housing opportunities. Cities and counties are required to consider such accommodation requests and provide them when deemed “reasonable” under fair housing laws and relevant case law. This includes the retrofitting of existing dwelling units and enforcing State accessibility standards for new residential construction.

Government Code Sections 65583 and 65583.2 mandate the housing element to address the needs of specific groups with special housing needs, including extremely low-income residents, seniors, persons with disabilities, large families, female-headed households with children, and persons experiencing homelessness. To cater to these groups, the City will encourage the provision of a variety of housing types, including community care facilities, supportive housing, and assisted living. Assisted living facilities are designed for individuals needing assistance with activities of daily living but desiring to live independently for as long as possible. As an alternative to group care facilities, the Senior Citizens’ Center at Cortez Avenue offers services aimed at assisting senior residents in maintaining independence in their homes.

The housing needs of persons with disabilities, in addition to affordability, range from slightly modifying existing units to requiring a varying range of supportive housing facilities. Funding for housing construction and rehabilitation typically addresses the needs of the needs of extremely-low-income residents since many of those with disabilities fall within this category. As housing is developed or identified, the City can work with the San Gabriel/Pomona Regional Center to implement an outreach program informing families of housing and services available for persons with developmental disabilities.

Actions	Objective and Timeframe
Action 4.2-a: Facilitate the development of housing for persons with disabilities (including developmental disabilities) through incentives including streamlined processing and providing resources and assistance for affordable housing development.	Facilitate the 40 housing units for special needs households during the planning period, or at least five units annually.
Action 4.2-b: Work with the Los Angeles County Development Authority to implement an outreach program informing residents of the housing and services available for persons with developmental disabilities. The City shall make information available on the City website and at the San Gabriel Pomona Regional Center. (SB 812; Ashburn, 2010)	Work with the San Gabriel Pomona Regional Center Implement outreach program by January 2025
Action 4.2-c: Continue to promote the HPP program to provide loans to qualified households to offset the cost remodeling existing homes to accommodate household members with disabilities.	Provide 15 households with accessibility improvements during the planning period by December 2029.

Actions	Objective and Timeframe
<p>Action 4.2-d: Review the Reasonable Accommodations Ordinance and revise findings to be based on objective standards rather than impacts on surrounding uses and provide a link to its Reasonable Accommodations policy on the Housing page of the City website. Remove the application fee for reasonable accommodation requests.</p>	<p>Amend the Reasonable Accommodations Ordinance to be based on objective findings and provide link on the Housing page of the City website by January 2025.</p>
<p>Action 4.2-e: Facilitate the development of alternative housing models suited to the housing needs of seniors and persons with disabilities such as housing co-operatives, Single-Room Occupancy (SROs), dormitories, tiny homes, and collective home ownership models in more areas of the city, including religious sites and publicly owned land. Stakeholder outreach shall include discussions with for-profit and non-profit housing developers.</p>	<p>Conduct stakeholder outreach with developers and community groups and service providers on alternative housing at least once by January 2026, with the goal of achieving 30 units of alternative housing types by the end of 2029.</p>
<p>Action 4.2-j: To ensure the community is aware of available resources, such as community assistance programs, senior housing resources, fair housing, landlord-tenant relations, and reasonable accommodations processes, the City will collaborate with service providers, non-profit organizations, employment-related organizations such as teachers; associations, and other agencies to disseminate this information to the general public, with an emphasis on underrepresented communities and special needs population groups. A list of available housing assistance and community assistance programs and services will be made accessible to the public, both online and in hardcopy format at City Hall and other appropriate public facilities such as libraries and community centers.</p> <p>The City will develop multilingual materials and outreach methods, including, but not limited to:</p> <ul style="list-style-type: none"> • Fair housing and housing program brochures • Directed outreach to historically underrepresented communities through workshops or pop-up events • Development of online materials for use on the City's website and with community partners and use of social media <p>Partnerships with local and regional service agencies for information dissemination</p>	<p>Prepare a list of assistance programs and services by December 2024. Disseminate information online through email and social media and in hardcopy format at least once every two years at all public centers. Update the City's website with housing program information by January 2025. Hold at least five workshops or pop-up events that inform residents about fair housing resources and housing programs during the planning period.</p>
<p>Action 4.2-j: Increase funding to provide information and referral to senior housing services through the Senior Citizens' Center at Cortez Avenue.</p> <p>Establish a housing match system that connects seniors to roommates to supplement rent and offer assistance with household chores.</p>	<p>Develop marketing materials by December 2025 to educate seniors on housing resources and distribute at the Senior Center.</p> <p>Facilitate ten housing matches during the planning period.</p>

Responsible Agency: West Covina Community Development Department, Planning Division

Potential Funding Source: Departmental Budget

Program 4.3 – Homeless Assistance and Housing

The City will continue to use CDBG funds to support agencies providing services to the homeless, persons at risk of becoming homeless and non-homeless persons with special needs. The City will continue to support efforts by local non-profits to expand the services provided to at-risk population groups. On an annual basis, the City provides CDBG funds for supportive services and transitional and temporary housing providers serving West Covina residents. The City has provided CDBG funds to assist non-profits such as East San Gabriel Valley Coalition for the Homeless, YWCA (Meals on Wheels) and food pantries. In addition, the City also issues vouchers for shelters to homeless persons at nearby motels to complement the Salvation Army.

Actions	Objective and Timeframe
<p>Action 4.3-a: Pursue federal, state, and regional funds for homeless service providers that operate temporary, permanent, and emergency shelters in the city that assist persons experiencing homelessness and at risk of becoming homeless. Consult with local community-based organizations and stakeholders to inform the design and development of homeless services, programming and needs assessments.</p>	<p>Apply for funds as notices of funding availability are released to provide support to organizations who serve people who experience homelessness. Consult with at least five community based organizations and stakeholders to inform and develop a plan to address homeless services and programming. Draft a plan by December 2026.</p>
<p>Action 4.3-b: Annually assess the capacity to accommodate individuals experiencing homelessness by comparing the most recent homeless Point-In-Time count to the number of shelter beds available on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing (AB 362, 2021-Quirk-Silva).</p> <p>Annually provide summary information to City Council on objectives and outcomes of the City's funded services. Monitor data and metrics to improve the efficacy of homeless services, programs, and investments on an annual basis. Reporting shall include, at minimum:</p> <ul style="list-style-type: none"> • Existing shelter beds • New shelter beds • Identify if those shelter beds are available on a year-round or seasonal basis • Average number of shelter beds that are unused on a monthly basis • Number of those exiting shelter to permanent housing • Ability to provide health and human services for unhoused residents with special needs (seniors, people with physical or mental impairments, victims of domestic violence, unsheltered youth, people with substance addictions, etc.) 	<p>Annually provide summary information on objectives and outcomes of City-funded services. Assess level of service and funding availability and coordinate with service providers to identify actions to address needs of residents experiencing homelessness. Create new or revised metrics and timelines.</p>
<p>Action 4.3-c: Provide financial and technical support to non-profit organizations to rehabilitate or develop affordable housing for extremely low-income households and persons at risk of experiencing homelessness. Expedite permit processing for the development of such units.</p>	<p>Support the rehabilitation or the development of at least 100 units of housing affordable to extremely low-income households and persons at risk of becoming homeless (including tiny homes, SRO units, micro units, co-housing units, or other alternative housing types) during the planning period. Make information on permit processing incentives available online by June 2024.</p>

<p>Policy Action 4.3-d: Develop a program with the Illumination Foundation or other organization that incentivizes property owners/managers with available units to rent to formerly homeless individuals and families.</p>	<p>Develop program by January 2025. Reach out to at least 10 property owners or managers by January 2026 with the goal of coordinating housing for at least 10 formerly homeless individuals and households during the planning period.</p>
<p>Action 4.3-e: Seek resources for the acquisition/rehabilitation and operations of Permanent Supportive Housing that offers appropriate services so that people experiencing chronic homelessness can maintain permanent housing, including finding opportunity sites and dedicating City affordable housing funds. Permanent Supportive Housing should include either on- or off-site case management for mental and physical health, addiction treatment, social services, and jobs skills development.</p>	<p>Support the acquisition or rehabilitation for the purposes of Permanent Supportive Housing with wraparound services for persons experiencing chronic homelessness, serving at least 50 extremely low-income residents during the planning period.</p>
<p>Action 4.3-f: Provide financial support to organizations that provide transitional housing for emancipated foster youth (ages 18-21) who are homeless or at immediate risk of becoming homeless.</p>	<p>Assist at least 10 foster youth with transitional housing during the planning period by December 2029.</p>

Responsible Agency: West Covina Public Services Department
Time Frame: Ongoing, 2021-2029
Potential Funding Source: General Fund and Community Development Block Grants

Goal 5: Identify Adequate Sites to Accommodate Housing Needs

Meeting the housing needs of all residents of the community requires the identification of adequate sites for all types of housing. By capitalizing on the allowances in the Development Code and continuing to maintain an inventory of potential sites, the City will assure that adequate residentially zoned and mixed use sites are available.

- Policy 5.1:** Provide for a range of residential development types in West Covina, including low-density single-family homes, moderate-density townhomes, higher-density multi-family units, and residential/commercial mixed-use in order to address the City’s share of regional housing needs.
- Policy 5.2:** Create mixed-use opportunities along key commercial corridors as a means of enhancing pedestrian activity and community interaction.
- Policy 5.3:** Maintain zoning regulations that permit by-right, in designated zones, housing that meets temporary and short-term housing needs for individuals and families.
- Policy 5.4:** Provide incentives to facilitate the development of senior housing options.
- Policy 5.5:** Require that housing constructed expressly for low- and moderate-income households not be concentrated in any single portion of the City.
- Policy 5.6:** Explore opportunities for new residential development within those areas of the City occupied by vacant or underutilized, obsolete commercial and industrial uses.

Programs

Program 5.1 – Ensure Adequate Sites to Accommodate the RHNA

The City's analysis of sites with potential for additional residential development is presented in Appendix B. The analysis demonstrates that there are adequate sites with sufficient capacity to accommodate additional housing at all income levels commensurate with the City's RHNA allocation for the 2021-2029 planning period.

Potential sites for lower-income housing are located in the Downtown area, which permits high-density infill development. Development in the Downtown is guided by the Downtown Plan and Code, which requires and encourages the development of high-density residential uses and allows for a mixture of residential and non-residential development on approximately 70 acres of the total 250-acre Downtown area. The Downtown Plan and Code identifies sites that require residential development at a minimum density of 21 dwelling units per acre up to a maximum of 54 dwelling units per acre.

The sites inventory also includes parcels outside the Downtown that are suitable for moderate- or above-moderate-income housing. The City is currently preparing a new Development Code that will update regulations for sites outside the Downtown.

To encourage the development of residential projects with affordable units, the City will continue to meet with land owners to facilitate redevelopment on sites within the Downtown and other areas. To further encourage development, the City may offer a menu of incentives including: development fee modifications, fast track processing, density bonus incentives, flexible development standards, and funding for off-site improvements, as indicated in the Housing Plan. Due to the State dissolution of redevelopment agencies, funding for these regulatory and financial incentives will be provided through CDBG and other grant funds. The City will also prioritize funding for projects that incorporate units for extremely-low-income households and persons with special needs.

In conformance with Government Code §65583.2(c), for any underutilized site identified in the prior Housing Element, residential development shall be allowed on the site by-right if at least 20 percent of units are affordable to lower-income households.

Pursuant to Government Code §65583.2(g)(3), for any development project on a nonvacant site identified in the sites inventory that currently has residential uses, or within the last five years have had residential uses that have been vacated or demolished, and were either rent or price restricted, or were occupied by low- or very-low-income households, replacement of those units affordable to the same or lower income level shall be required as a condition of development approval consistent with State Density Bonus Law.

Actions	Objective and Timeframe
<p>Action 5.1-a: To ensure that the City monitors its compliance with SB 166 (No Net Loss), the City will develop a procedure to track:</p> <ul style="list-style-type: none"> • Unit count and income/affordability assumed on parcels included in the site inventory. • Actual units constructed and income/affordability when parcels are entitled and developed. <p>Net change in capacity and summary of remaining capacity in meeting remaining RHNA. If Planned, Approved, and Pending projects are not proceeding as anticipated, the City shall identify sites appropriate for development that can accommodate the specified number of units appropriate for low-income, moderate-income, or above-moderate income households.</p>	<p>Completion of No Net Loss procedures by July 2024. Ongoing annual reporting via annual progress report. Beginning in August 2024, semi-annually review the list of Planned, Approved, and Pending projects and, if projects are not proceeding as anticipated (e.g., entitlements are set to expire, permit applications are not submitted or withdrawn, and/or construction is delayed such that certificates of occupancy will not foreseeably be granted by the end of the planning period), identify sites appropriate for development that can accommodate the specified number of units appropriate for low-income, moderate-income, or above-moderate income households. Annually report on progress of Planned, Approved, and Pending projects and any substituted sites in Annual Progress Report throughout the planning period.</p>
<p>Action 5.1-b: Annually monitor the City's remaining housing capacity to ensure compliance with the City's obligation to affirmatively further fair housing. Maintain a Site Inventory and make it available to developers. Actively promote available parcels appropriate for development that can accommodate low-income and/or moderate-income households to private or non-profit housing providers to support the RHNA of 1,653 very low-income units, 850 low income units, 865 moderate income units, and 1,978 above moderate-income units.</p>	<p>Draft an annual memo on the City's remaining housing capacity. Ensure sufficient capacity for the development of 1,653 very low-income units, 850 low-income units, 865 moderate income units, and 1,978 above moderate-income units during the planning period.</p>
<p>Action 5.1-c: Maintain a list of publicly owned properties with potential for residential development. Use City-ownership as an incentive for affordable housing development. To the extent feasible, the City will pursue projects that include housing for extremely low-income households and those with special needs such as seniors and persons with disabilities. The City will take necessary actions to support and promote housing on these sites.</p>	<p>Publish list of publicly owned sites on the City's website by June 2024. Prioritize releasing Surplus Lands Act-related documents for City-owned parcels. If residential development on publicly owned parcels does not appear feasible by January 2027, identify potential sites to accommodate the 890 extremely low- and 763 low-income units.</p>
<p>Action 5.1-d: Ensure that the mixed-use zones provide opportunities for residential development.</p>	<p>In 2025, the City will evaluate all development in the mixed-use zones to better determine how often development has a residential component and make adjustments, as necessary, to maintain adequate sites throughout the planning period within one year. Adjustments may include modifying capacity assumptions, identify additional sites, providing additional incentives or rezoning.</p>

Responsible Agency: West Covina Planning Division
Potential Funding Source: General Fund

Program 5.2 – Encourage Lot Consolidation and Infill

Parcels identified as housing opportunity sites within the Downtown greatly range in size and in some cases are narrow or shallow in size, which could be seen as an additional constraint to the development of housing. To encourage the development of residential and mixed-use projects, the City encourages lot consolidation through incentives such as a reduction in development standards (i.e., lot size, parking, and open space requirements) to merge adjacent lots. When funds are available, the City may also offer to subsidize a portion of development fees to encourage lot consolidation and to promote more intense residential and mixed-use development on vacant and underutilized sites within the Downtown. The City will promote the program at City Hall and on its website, and will evaluate requests for funding on a case-by-case basis.

Actions	Objective and Timeframe
<p>Action 5.2-a: Maximize the density potential of limited land resources by promoting residential densities that achieve the highest allowable density for specific properties, particularly within 0.25-mile of high-quality public transit stops.</p>	<p>The City will annually review the Zoning Code, and update if necessary, to remove potential constraints to achieving highest possible densities beginning in 2024.</p>
<p>Action 5.2-c: Provide technical assistance to applicants receptive to lot consolidation to encourage housing development with a minimum of 16 units at a density of at least 30 dwelling units per acre or higher, with priority for developments that support low- and moderate-income housing.</p> <p>The City will provide at least one of the following incentives:</p> <ul style="list-style-type: none"> • Increased Floor Area • Increased Building Height • Reduced Setbacks • Parking Reduction: Required parking may be reduced subject to finding that due to lot consolidation adequate parking will be available to serve the subject project • Signage Bonus: Area of permitted signs in mixed use zones may be increased, subject to finding that the increased size of signs on one consolidated parcel will not adversely affect the visibility of signs on adjacent parcels. 	<p>Offer interdepartmental pre-development consultation for multifamily housing developments with lot consolidation and annually report on applications throughout the 2021-2029 planning period.</p> <p>By January 2025, implement lot consolidation incentives to facilitate residential or mixed-use development. Review by December 31, 2026 and if necessary, modify the program to provide additional incentives to encourage lot consolidation.</p> <p>Develop promotional brochures for display at the planning counter by January 2025 and publish information on City website by January 2025.</p>
<p>Action 5.2-e: Evaluate commercial parking standards to increase flexibility for redeveloping commercial properties with residential uses in zoning districts that allow residential development. Provide technical assistance for owners of commercial centers to redevelop properties for residential uses. Prioritize technical assistance such as parking analysis for sites identified in the Sites Inventory as opportunities for units affordable to lower and moderate-income households.</p>	<p>Conduct outreach to property owners of sites in the Site Inventory that include parking lots for sites with opportunities for lower and moderate-income unit development.</p> <p>Provide technical assistance to at least 10 property owners of commercial developments with parking lots that desire to develop residential uses by January 2029.</p> <p>By January 2027, hold discussions with at least three commercial property owners or managers of shopping centers to identify changes to the City’s development standards that would increase flexibility for residential development. If any changes are identified, amend the City’s Municipal Code and/or Zoning Code by January 2028.</p>

Responsible Agency: West Covina Planning Division

Potential Funding Source: General Fund

2.3 Quantified Objectives

State housing law requires that to the extent feasible, each jurisdiction establish the number of housing units that can be constructed, rehabilitated, and preserved over the planning period. The Quantified Objectives for this Housing Element are shown in Table 2-1 and reflect the 2021-2029 planning period.

Achievement of the City’s RHNA allocation will heavily depend on a variety of factors beyond the City’s control, including private decisions of property owners and developers and availability of resources provided by state, federal and county programs to support the needs of the extremely low-, very-low-, low-, and moderate-income households. It is important to note that while the City must identify quantified objectives, the City cannot guarantee that these objectives will be met given the limitations on financial, governmental, and other resources, as well as broad economic forces that heavily influence the housing market. Accordingly, State law recognizes these factors and acknowledges that cities may not achieve their assigned shares of the regional housing need.

Table 2-1 2021-2029 Quantified Objectives

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
Construction ^(a)	827	826	850	865	1,798	5,346
Rehabilitation ^(b)	0	10	10	10	0	30
Conservation/Preservation ^(c)	663			0	0	663

Notes

- (a) Construction objectives represent the City’s 2021-2029 RHNA allocation
- (b) Any CDBG funding received during the planning period will be used to fund projects that improve and maintain the quality of the City’s housing stock and residential infrastructure.
- (c) 96 At-risk units and 579 housing choice vouchers.

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Section 3

Housing Needs Assessment

3.1 Introduction

Incorporated in 1923, the development of West Covina began in earnest with the post-World War II housing boom. The growth of the city continued through the 1950s and 1960s paralleling the suburbanization of the eastern half of San Gabriel Valley. Suburbanization played a large role in the development of the city, shifting away from a more traditional development consisting of a densely concentrated commercial center downtown surrounded by housing whose age increases the further the unit is from the downtown. The city is instead characterized as a series of residential neighborhoods, with commercial districts along arterial streets and large, regional commercial (primarily retail) centers along either side of the San Bernardino Freeway (Interstate 10).

Although the City of West Covina was incorporated in the 1920s, there are few remaining structures in the city that pre-date the 1940s. The western and northern portions of the city bordering Baldwin Park and Covina predominately contain the neighborhoods with older homes. These sections of the city include residences on smaller lots, many of which have lower property values. Some of the residences in these older neighborhoods are in need of improvement and rehabilitation due to their age. In contrast, the eastern portion of the city is characterized by newer more expensive housing typically on larger lots. These wealthier neighborhoods are most commonly located the hillside areas bordering the City of Walnut where many of the neighborhoods were developed from the subdivision of old estates and ranches.

Historically, the City of West Covina has provided affordable housing alternatives to the “closer in” Los Angeles communities of Pasadena, San Marino, Monterey Park, and Arcadia. For much of the 20th century it was relatively easy for the average household to find a reasonably priced home in the city. This changed by the 1980s as the disparity between income and housing cost had increased rapidly largely due to the increased demand for housing throughout the Southern California region. The gap between housing and income increased further in the latter part of the 1990s when Southern California experienced a significant economic boom. The beginning of the 21st century brought with it a significant economic upturn and consequently housing prices in West Covina more than doubled between 2000 and 2007. Following several years of economic decline during the “Great Recession” the local economy stabilized and the housing market has strengthened considerably in the past few years.

The economic base of West Covina is dominated by regional and local retail, service-oriented businesses, and health care establishments. While other types of commercial and industrial land uses exist in the city, roughly two-thirds of the jobs in West Covina are retail and service-related.

3.2 Data Sources

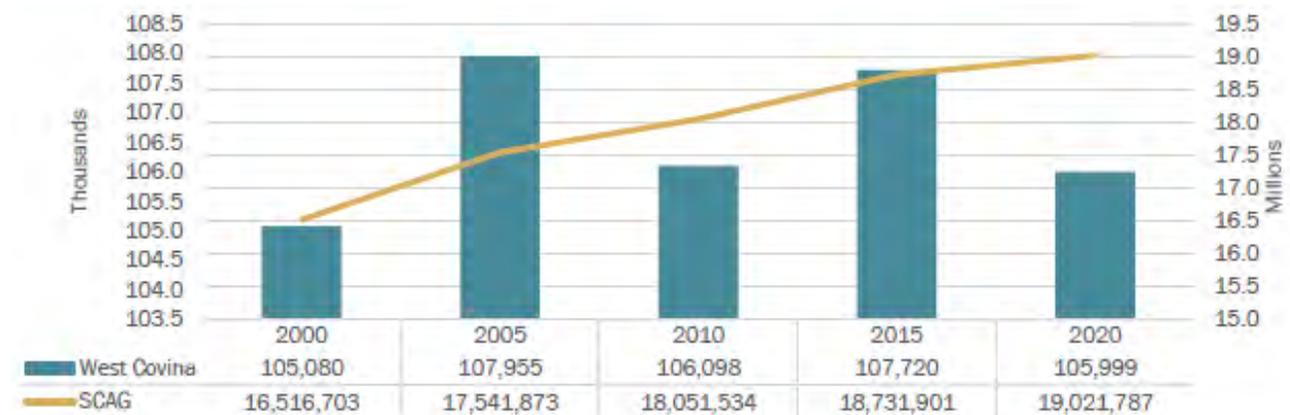
The primary data sources used for the Needs Assessment include the U.S. Census and American Community Survey (ACS), the federal Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), California Department of Finance, and the Southern California Association of Governments (SCAG).

3.3 Population Trends and Characteristics

3.3.1 Population Growth Trends

According to recent California Department of Finance estimates, West Covina had a 2020 population of 105,999 including 674 living in group quarters. Over the period 2000-2020 West Covina’s population increased only slightly (Figure 3-1).

Figure 3-1 Population Trends 2000-2020 - West Covina vs. SCAG Region



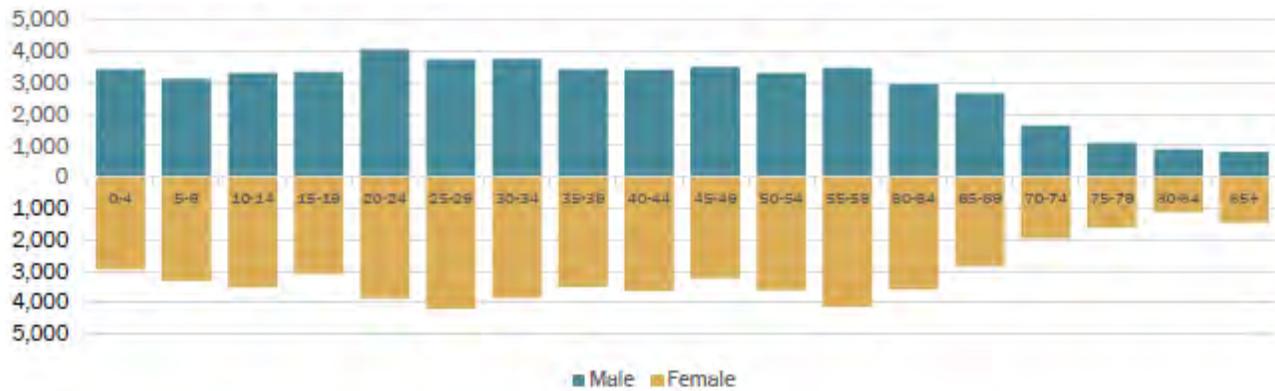
Source: CA DOF E-5 Population and Housing Unit Estimates, 2020

3.3.2 Age and Sex Composition

The age composition of a population is an important factor in evaluating housing needs. The traditional assumption in many communities is that young adults tend to prefer apartments, low- to moderate-cost condominiums, and smaller or more affordable single-family units. In comparison, it is assumed that mature adults provide the market for moderate- to high-end condominiums and single-family homes. Finally, the senior population tends to generate demand for low- to moderate-cost apartments, condominiums, community residential settings, and mobile homes.

According to recent Census estimates the population of West Covina is about 48.5 percent male and 51.5 percent female. The share of the population of West Covina under 18 years of age is 21.8 percent, which is lower than the regional share of 23.4 percent. West Covina's seniors (65 and above) make up about 15 percent of the population, which is higher than the regional share of 13 percent (Figure 3-2).

Figure 3-2 Population by Age and Sex– West Covina

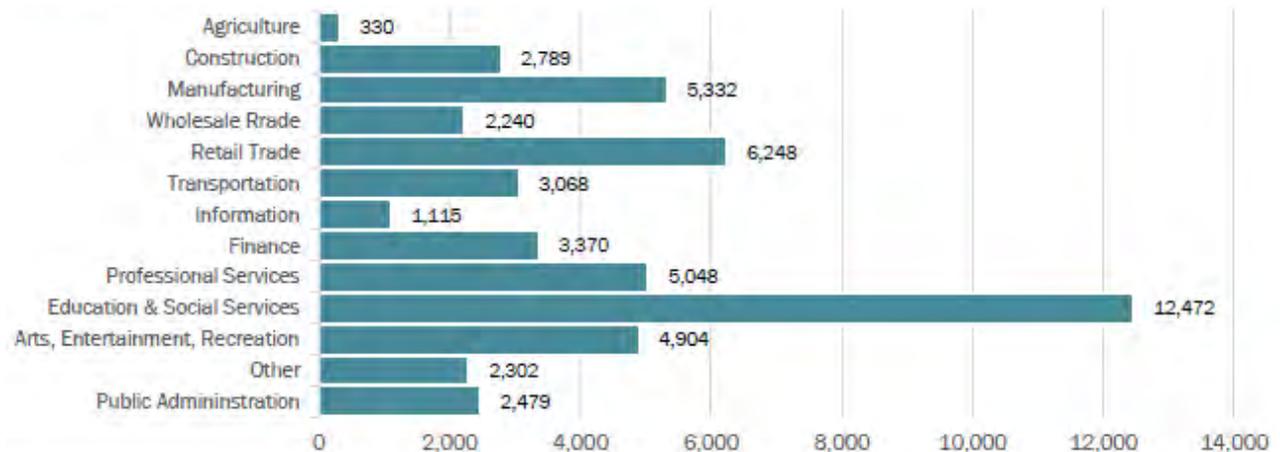


Source: American Community Survey 2014-2018 5-year estimates

3.3.3 Employment Characteristics

Employment is an important factor that affects a household’s income and ability to secure housing. West Covina residents are employed in a variety of industries, with the largest percentage of the population employed in the education and social services sector (Figure 3-3).

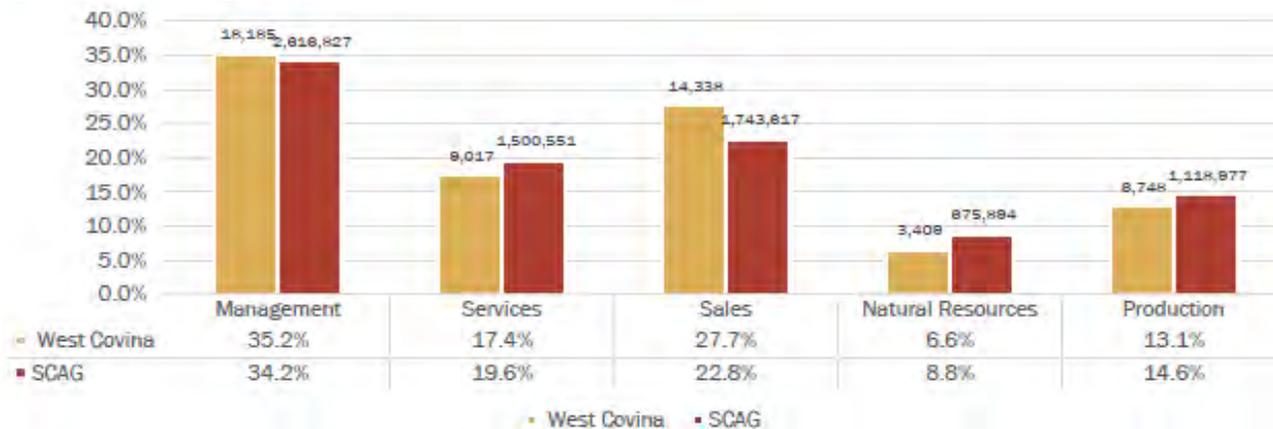
Figure 3-3 Employment by Industry – West Covina



Source: American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes.

Employment by occupation for West Covina residents compared to the SCAG region as a whole is shown in Figure 3-4. The most common occupational category in both the city and the region is management.

Figure 3-4 Employment by Occupation - West Covina



Source: American Community Survey 2014-2018 5-year estimates using groupings of SOC codes.

3.4 Household Characteristics

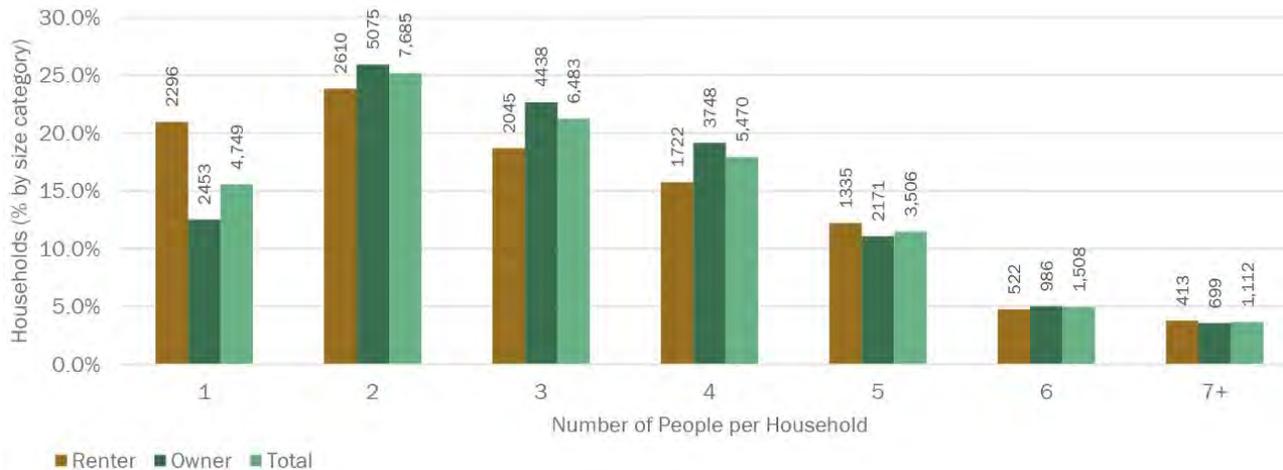
Before current housing problems can be understood and future needs anticipated, housing occupancy characteristics need to be identified in the city. The following is an analysis of household types and sizes, and other household characteristics that may affect housing needs.

3.4.1 Household Size

Household composition and size are often two interrelated factors as communities with a large proportion of families with children tend to have a large average household size. Such communities have a greater need for larger units with adequate open space and recreational opportunities for children.

Figure 3-5 illustrates the range of household sizes in West Covina for owners, renters, and overall. The most commonly occurring household size is two people (25.2 percent) and the second-most commonly occurring household size is three people (21.2 percent). West Covina has a lower share of single-person households than the SCAG region overall (15.6 percent vs. 23.4 percent) and a higher share of 7+ person households than the SCAG region overall (3.6 percent vs. 3.1 percent).

Figure 3-5 Household Size by Tenure – West Covina



Source: American Community Survey 2014-2018 5-year estimates.

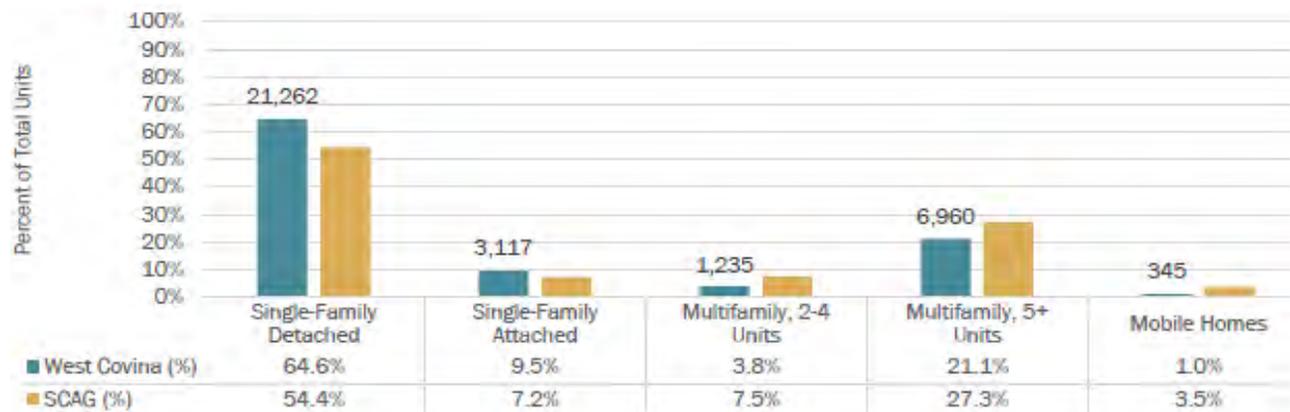
3.5 Housing Inventory and Market Conditions

This section summarizes the existing housing stock in West Covina and prevailing market conditions.

3.5.1 Housing Type

Diversity in the types of housing available within a community promotes equal housing opportunity for persons of all income levels. A balanced housing stock allows households of all income levels, age, and size, the opportunity to find housing suited to their needs. According to recent Census estimates (Figure 3-6), the most prevalent housing type in West Covina is single-family detached. The share of all single-family units in West Covina is 74.1 percent, which is higher than the 61.7 percent share in the SCAG region as a whole. The overall vacancy rate is about 4.5 percent and the average household size (as expressed by the population to housing unit ratio) is approximately 3.35.

Figure 3-6 Housing Units by Type – West Covina

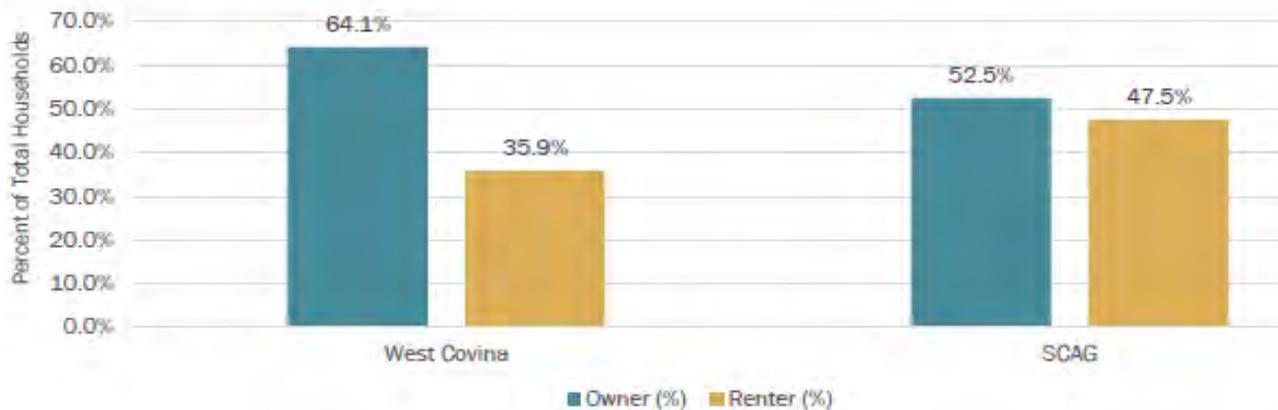


Source: CA DOF E-5 Population and Housing Unit Estimates

3.5.2 Tenure

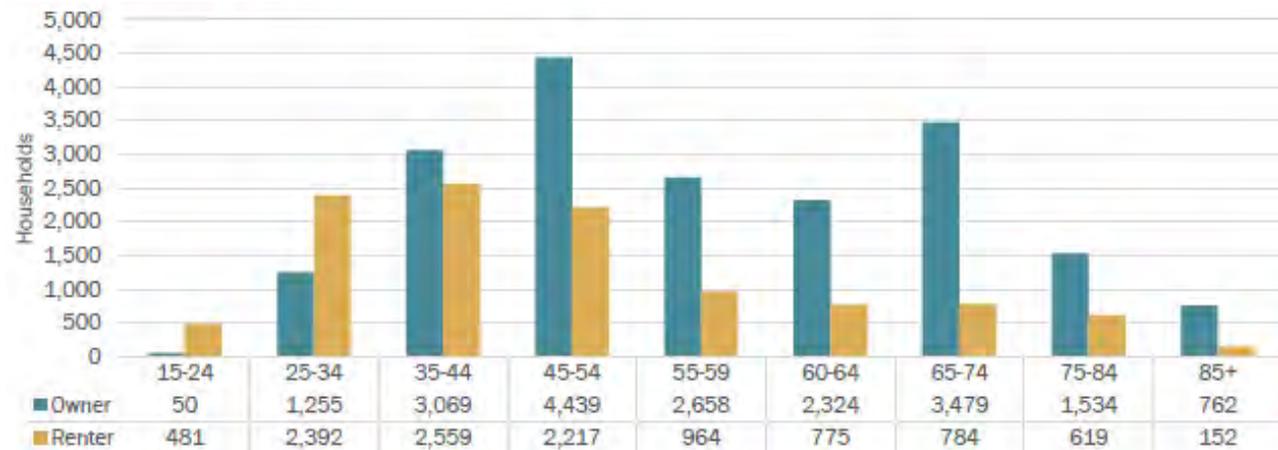
Housing tenure refers to whether a given unit is owned or rented. According to recent Census estimates, nearly two-thirds of housing units in West Covina were owner-occupied compared to only about 53 percent for the region as a whole (Figure 3-7). Figure 3-8 shows the relationship between tenure and the age of West Covina residents. The majority of residents under age 35 are renters while most older residents are homeowners.

Figure 3-7 Housing by Tenure – West Covina vs. SCAG Region



Source: American Community Survey 2014-2018 5-year estimates.

Figure 3-8 Housing Tenure by Age – West Covina

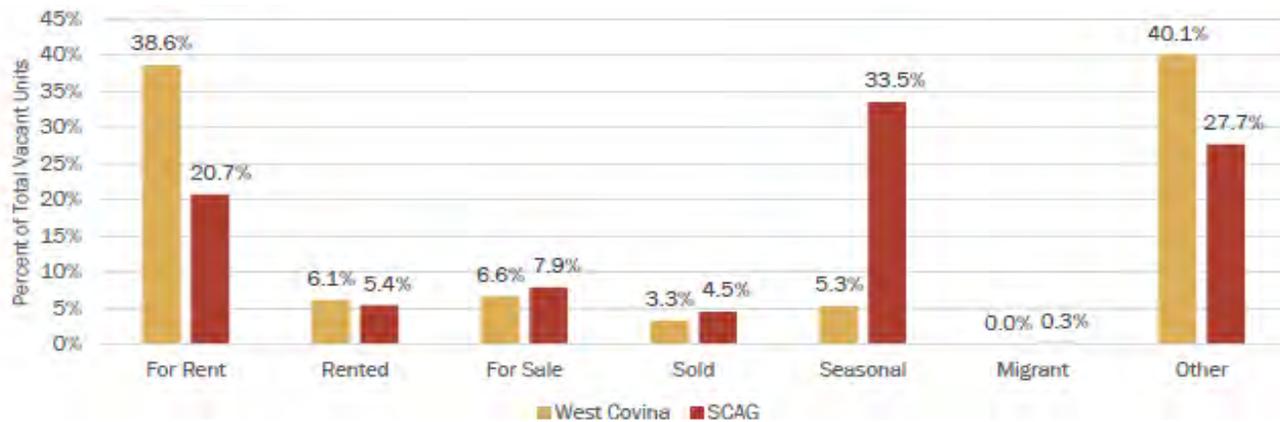


Source: American Community Survey 2014-2018 5-year estimates.

3.5.3 Vacancy Rates

Vacancy rates indicate how well the types of housing units that exist in the city meet the current market demand for housing. A low vacancy rate suggests that households may have difficulty finding a unit within their price range due to a limited supply of available housing. Low vacancy rates may also be related to overcrowding, as discussed in later sections. In contrast, a high vacancy rate may indicate either the existence of a high number of units undesirable for occupancy, or an oversupply of housing units. Figure 3-9 shows recent data regarding vacant housing units in West Covina as compared to the SCAG region as a whole.

Figure 3-9 Vacant Units by Type – West Covina vs. SCAG Region



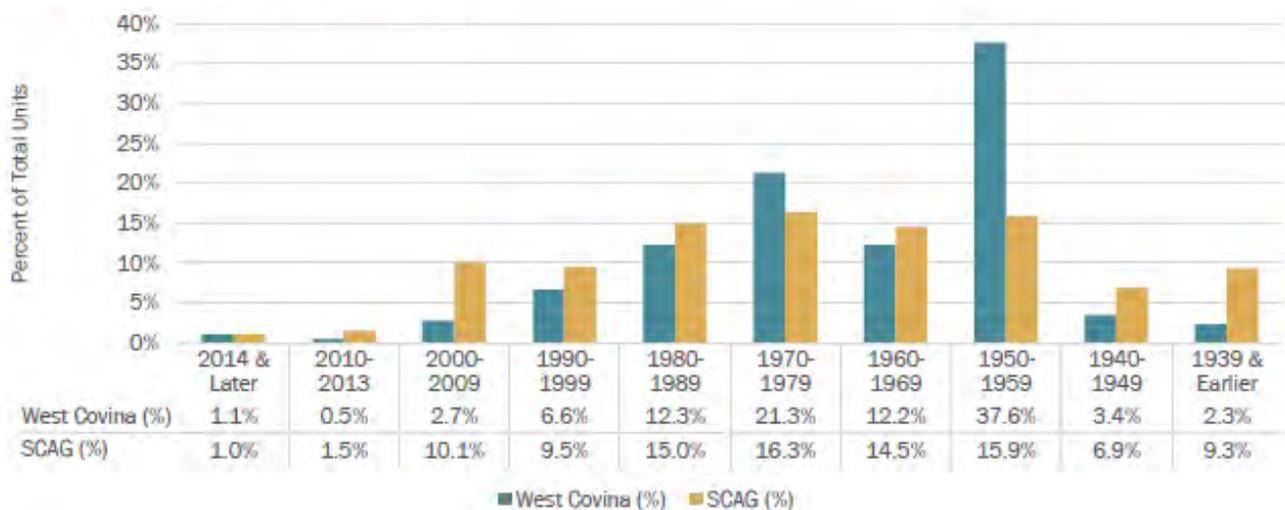
Source: American Community Survey 2014-2018 5-year estimates.

3.5.4 Age of Housing Stock

The age and condition of the city’s housing stock provides an additional measure of housing adequacy and availability in many communities. Although age does not always correlate with substandard housing conditions, neighborhoods with a large proportion of the housing stock over 40 years old are more likely than newer neighborhoods to have a concentration of housing problems related to deferred maintenance, inadequate landscaping care, outdated utilities or interior amenities, and a need for housing rehabilitation.

The age of housing can be an indicator of the current condition of the housing unit. Well-constructed homes typically show signs of deterioration and require repair after 30 years if not adequately maintained. This timeframe can be shortened depending on the construction techniques and other factors such as weather conditions. Figure 3-10 indicates that more than two-thirds of the city’s housing stock was built before 1980.

Figure 3-10 Year Structure Built – West Covina vs. SCAG Region



Source: American Community Survey 2014-2018 5-year estimates.

3.5.5 Housing Conditions

Housing is considered substandard when physical conditions are below the minimum standards of living defined by Section 1001 of the Uniform Housing Code. Residents living in substandard conditions are considered to be in need of housing assistance even if they are not actively seeking alternative housing arrangements.

In general, housing units range in the types of features they offer. Depending on the year they were built and the quality of construction, they can lack basic amenities including, but not limited to a complete kitchen, heating and plumbing facilities. Because roughly 80 percent of the city's housing stock is more than 40 years old, it is likely that a large number of homes are in need of rehabilitation. A general reconnaissance of older neighborhoods in the city suggests that between 2 percent and 3 percent of the city's housing stock is in need of repair, while fewer than a dozen homes may be in need of replacement.

3.6 Housing Costs

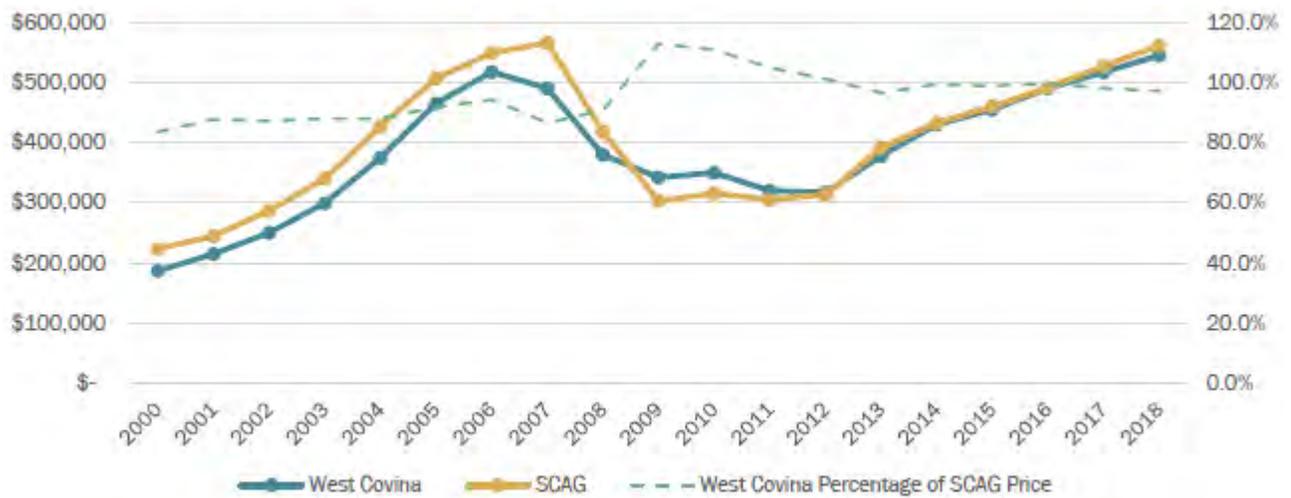
The following section discusses recent data regarding owner and rental housing cost in West Covina.

3.6.1 Owner-occupied Housing

Housing costs in West Covina can vary substantially by neighborhood. In general, western and northern portions of the city that border Baldwin Park and Covina contain neighborhoods with housing that is older and substantially lower in cost than neighborhoods in eastern and southern portions of the community bordering the City of Walnut. The latter parts of West Covina include hillside areas that have developed from former ranches and large estates. Consequently larger, more expensive homes on larger lots are common. In general, housing in eastern and southern West Covina is newer than in the western and northern parts of the city, although there are exceptions where redevelopment of residential areas has occurred.

Figure 3-11 shows housing sale price trends in West Covina compared to the SCAG region as a whole during 2000 to 2018. During this period, median home sales prices in West Covina increased 192 percent while prices in the SCAG region as a whole increased 151 percent. 2018 median home sales prices in West Covina were \$545,000 and the highest experienced since 2000 was \$545,000 in 2018. Prices in West Covina have ranged from a low of 83.6 percent of the SCAG region median in 2000 and a high of 112.9 percent in 2009.

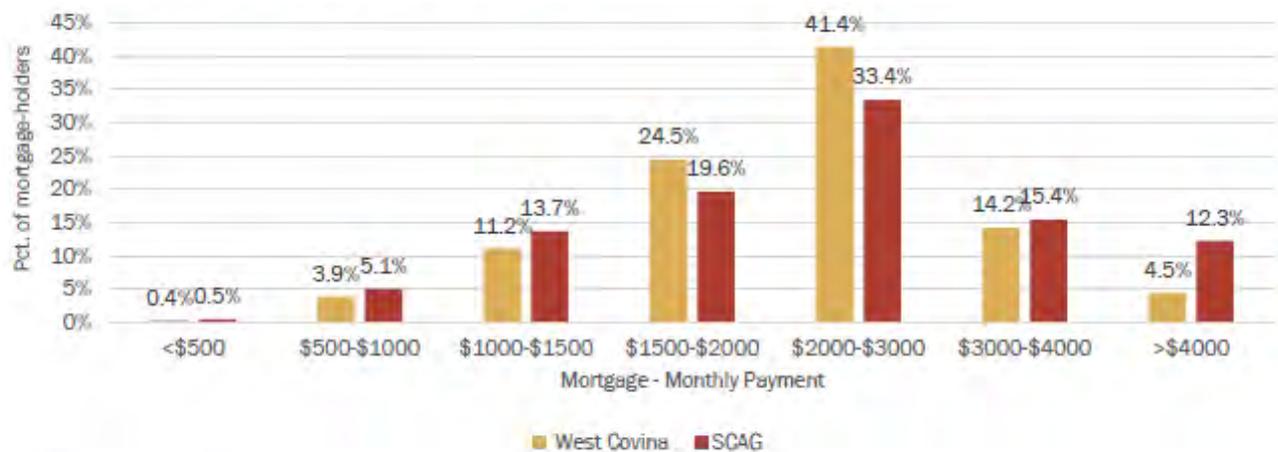
Figure 3-11 Median Home Sales Prices for Existing Homes 2000-2018 – West Covina vs. SCAG Region



Source: SCAB Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians.

As shown in Figure 3-12, the most common monthly cost for homeowners with a mortgage in both West Covina and the region as a whole is \$2,000-3,000.

Figure 3-12 Monthly Owner Costs for Mortgage Holders – West Covina vs. SCAG Region



Source: American Community Survey 2014-2018 5-year estimates.

As housing demand continues to surpass supply, the cost of housing in Southern California is expected to remain high in comparison to the nation as a whole. This is of great concern not only for lower-income families who often cannot afford a large down payment but is increasingly impacting middle class and workforce families (e.g., teachers, firefighters) who have difficulty affording a decent home.

3.6.2 Rental Rates

Figure 3-13 shows recent Census estimates of rental costs as a percentage of income in West Covina. The most common monthly rental expense is more than 50 percent of income, which is considered by State and federal standards to be overpayment. As seen in Figure 3-14, the percentage of household income spent on rent is typically higher for households at the lower end of the income spectrum. According to Zillow’s market summary tool, the median rental price listed in West Covina is \$2,691 for August 2023, similarly, the city’s median rental price in August 2022 was \$2,700. The current rental conditions in West Covina are slightly lower than Los Angeles County with an average rent of \$2,700 per month. Although market summary tools offer a snapshot of current rental conditions comparing the current prices within the region to previous census data, rent has continued to increase within both the city and the county. According to ACS estimates, the median rent in West Covina was approximately \$1,872 per month during 2017-2021 compared to \$1,653 for Los Angeles County (Table 3-1). This represented an increase of 29 percent from the median rent in the City from 2012-2016 and an increase of 31 percent during the same period for the County.

Figure 3-13 Percentage of Income Spent on Rent - West Covina

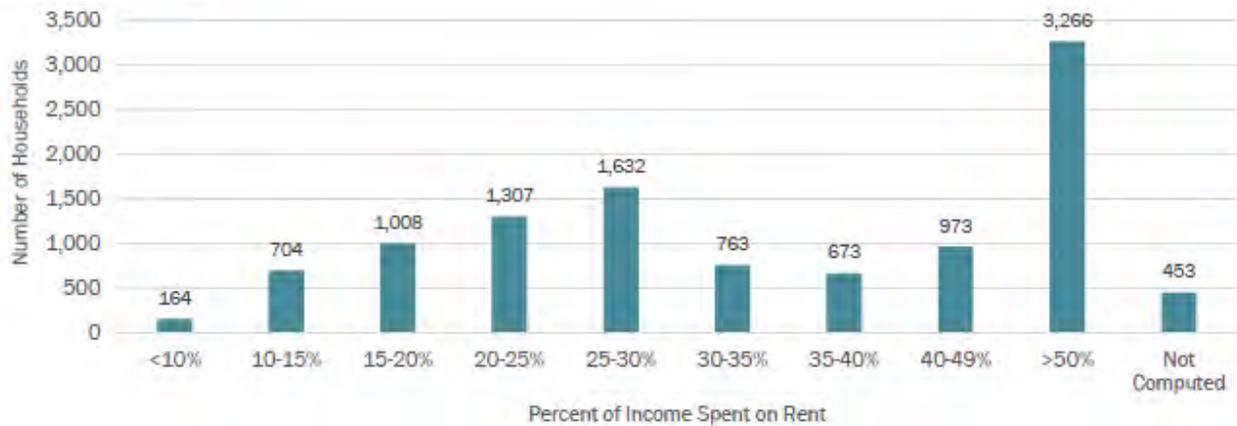


Figure 3-14 Rental Cost by Income Category - West Covina



Source: American Community Survey 2014-2018 5-year estimates.

Table 3-1 Median Gross Rent

	5 Years (2011-2016 5-year Estimates)	Current (2016-2021 5-year Estimates)
Los Angeles County	1,264	1,653
West Covina	1,449	1,872

American Community Survey, 2011-2016 and 2016-2021 5-year estimates, Table B2503.

3.6.3 Overcrowding

In response to higher home prices, lower-income households must often accept smaller housing units. This can result in overcrowding, which places a strain on physical facilities, does not provide a satisfying living environment, and can have negative impact on the surrounding neighborhood. The US Census defines overcrowding as 1.01 or more persons per room, and extreme overcrowding as more than 1.5 persons per room. Overcrowding typically results when:

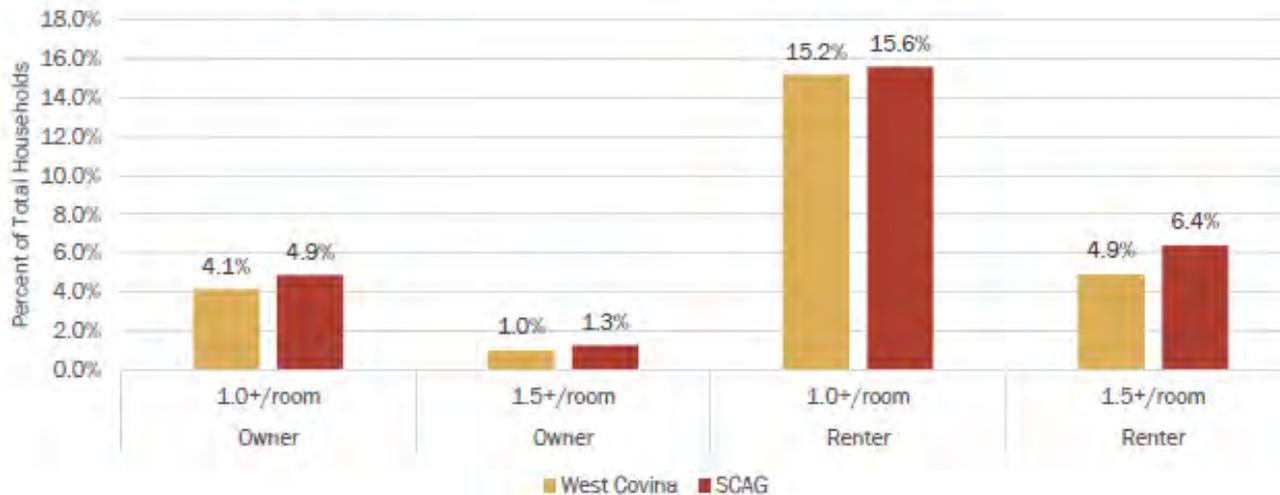
- A family or household is living in too small of a dwelling;
- Familial household includes extended family members; and/or
- A family is renting living space to non-family members.

Overcrowding is often symptomatic of greater affordability issues. Some scenarios of how a lack of affordability promotes overcrowded conditions include:

- Large households unable to afford larger dwellings that must then move into smaller than acceptable units;
- Older children wishing to leave home who are prohibited from doing so because they cannot qualify for a home loan and/or are unable to make rental payments; or
- Grandparents or elders on fixed incomes who are unable to afford housing suitable for their physical handicaps and must often move in with their grown children or other family members.

Figure 3-15 summarizes the status of overcrowding in West Covina compared to the SCAG region as a whole. In West Covina, 4.1 percent of owner-occupied households and 15.1 percent of renter-occupied households had more than 1.0 occupants per room, while an additional 1.0 percent of owner-occupied households and 4.9 percent of renter-occupied households had more than 1.5 occupants per room. The rate of overcrowding in West Covina was slightly lower than the regional average.

Figure 3-15 Overcrowding by Tenure – West Covina vs. SCAG Region



Source: American Community Survey 2014-2018 5-year estimates.

3.6.4 Overpayment

State and Federal standards specify that households spending more than 30 percent of gross annual income on housing are experiencing overpayment. Overpayment may cause a series of related financial problems and can result in a deterioration of housing stock. Funds that would be allocated for maintenance are instead sacrificed for more immediate expenses (e.g., food, clothing, medical care, and utilities). Overpayment also leads to overcrowding, which contributes to a variety of problems, from accelerating the rate of deterioration, to children’s decreased performance in school, to code enforcement issues. Higher-income households are generally more able to secure housing within their budgets and are more capable of paying a larger proportion of their income for housing. Therefore, housing overpayment estimates usually focus on lower income groups. Table 3-2 summarizes recent estimates of overpayment in West Covina by income category. As may be expected, households in the lowest income categories had the highest rates of overpayment.

Table 3-2 Overpayment by Income Category – West Covina

Income	Households by Share of Income Spent on Housing Cost		
	< 30%	30-50%	> 50%
< 30% HAMFI	485	504	2,960
30-50% HAMFI	1,020	1,449	1,705
50-80% HAMFI	2,595	2,320	867
80-100% HAMFI	2,505	1,095	149
> 100% HAMFI	11,240	1,320	153
Total Households	17,845	6,688	5,834

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

3.7 Special Needs Groups

Government Code Section 65583(a)(7) identifies several categories of persons as having special needs that must be addressed in the Housing Element. These include the elderly, persons with disabilities, including developmental disabilities, large families with 5 or more persons, female heads of household, people experiencing homelessness, and farmworkers. This section contains a discussion of the housing needs each of these groups might face. Most of these groups have overlap with one or multiple special needs that further impacts the ability to find affordable housing that also fits those specific needs.

3.7.1 Elderly

Federal housing data define a household type as 'elderly family' if it consists of two persons with either or both age 62 or over. The special housing needs of the elderly are an important concern in West Covina, particularly as the number of elderly persons in the city increases. The elderly population is a crucial group as retired persons are more likely to be on fixed low incomes, have certain disabilities, and/or experience housing overpayment. The special housing needs of the elderly also extend to the construction and location of units which can further limit affordability. Elderly individuals often require ramps, handrails, lower than standard cupboards and counters and other housing features to allow for access and function. Additionally, the elderly often find it more difficult to access public facilities (i.e., medical and shopping) due to limited mobility. Finding reliable means of transportation to medical appointments, senior centers, meal sites and shopping remains a serious problem for many seniors. This can be alleviated by locating housing units close to the amenities commonly used by the elderly but can influence the total cost of housing development. Table 3-3 shows that about 23.8 percent of elderly households in West Covina earn less than 30 percent of the surrounding area income, (compared to 24.2 percent in the SCAG region), 44.5 percent earn less than 50 percent of the surrounding area income (compared to 30.9 percent in the SCAG region).

Table 3-3 Elderly Households by Income and Tenure

Income Category Relative to Surrounding Area	Owner	Renter	Total	Percent of Total Elderly Households
< 30% HAMFI	800	795	1,595	23.8%
30-50% HAMFI	990	395	1,385	20.7%
50-80% HAMFI	935	260	1,195	17.8%
80-100% HAMFI	595	120	715	10.7%
> 100% HAMFI	1,575	230	1,805	27.0%
Total Households	4,895	1,800	6,695	

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

3.7.2 Large Families

Large families are defined as those with five or more persons. Large families require special consideration, because they generally require larger dwellings with sufficient bedrooms to meet their housing needs without overcrowding. According to recent Census estimates, large families represented about 3,856 (20 percent) owner-occupied households and about

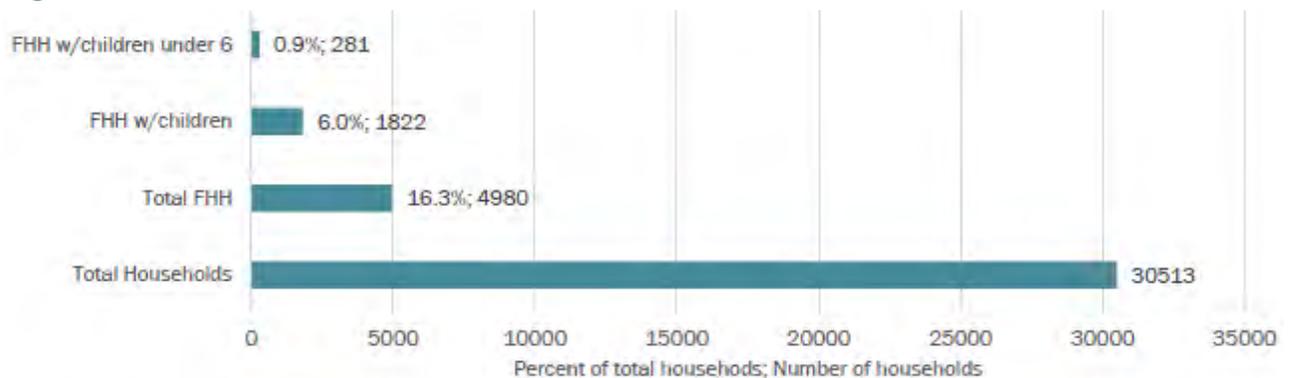
3,856 (21 percent) renter-occupied households in West Covina. Securing housing large enough to accommodate all members of a household is more challenging for renters because multi-family rental units are typically smaller than single-family ownership units. While apartment complexes in the city offering three bedrooms are common, apartments with four or more-bedroom units are rare. It is more likely that a large family will experience overcrowding in comparison to smaller families.

3.7.3 Female-Headed Households

Female-headed households are considered a special needs group because women leading families have proportionally lower rates of homeownership, lower incomes and higher poverty rates than other family compositions. Figure 3-16 indicates characteristics of the female-headed households in the City of West Covina. According to recent Census estimates, about 16.3 percent of West Covina households are female-headed (compared to 14.3 percent in the SCAG region), 6 percent are female-headed and with children (compared to 6.6 percent in the SCAG region), and 0.9 percent are female-headed and with children under 6 (compared to 1.0 percent in the SCAG region).

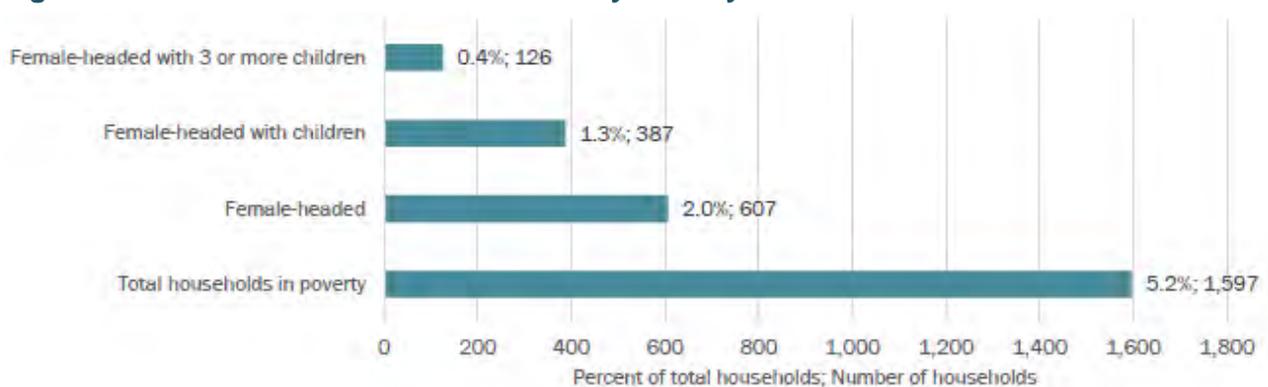
About 5.2 percent of West Covina's female-headed households are experiencing poverty, compared to 7.9 percent of households in the SCAG region. Figure 3-17 shows estimated poverty rates for female-headed households in West Covina.

Figure 3-16 Female-Headed Households – West Covina



Source: American Community Survey 2014-2018 5-year estimates.

Figure 3-17 Female-Headed Households by Poverty Status – West Covina

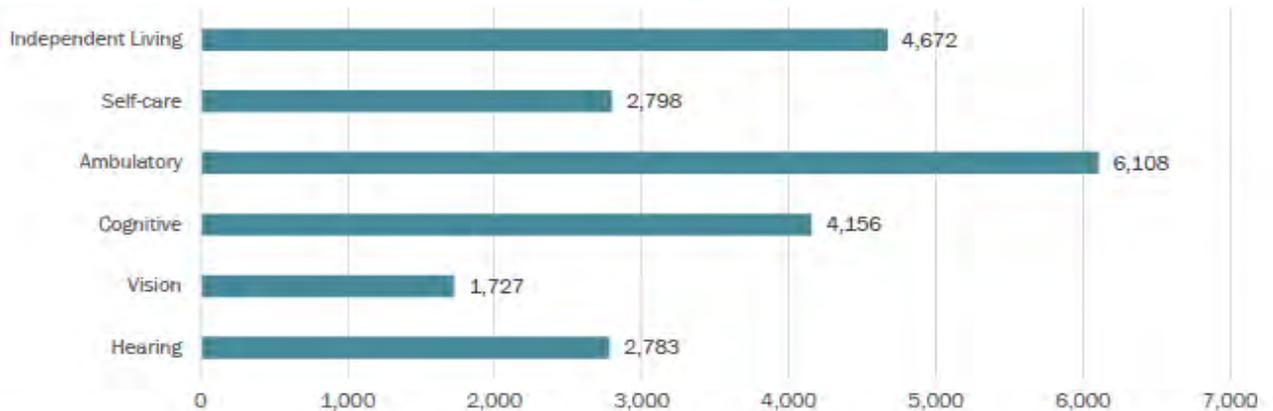


Source: American Community Survey 2014-2018 5-year estimates.

3.7.4 Persons with Disabilities

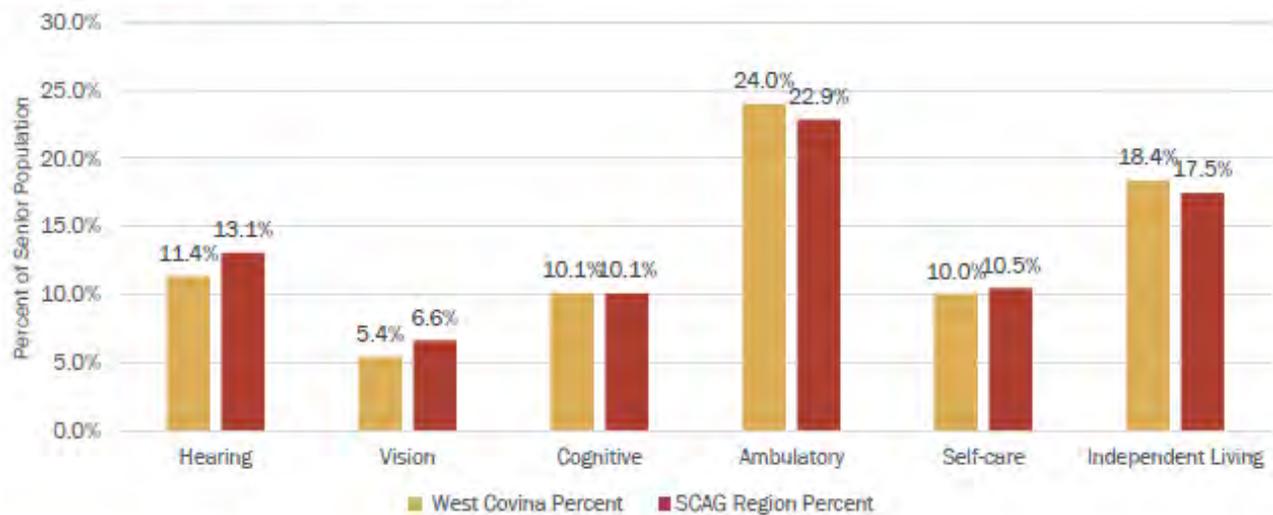
Access and affordability are the two major housing needs of persons with disabilities. Disabilities often require special features in dwelling units to allow mobility. California Administrative Code Title 24 sets forth some access and adaptability requirements to address mobility issues. Figure 3-18 shows recent Census estimates of the types of disabilities affecting West Covina residents while Figure 3-19 shows disabilities among senior citizens. Approximately 39 percent of West Covina residents with a disability are in the labor force. Table 3-4 shows number of individuals with disabilities by employment status.

Figure 3-18 Disability by Type – West Covina



Source: American Community Survey 2014-2018 5-year estimates.

Figure 3-19 Disability by Type for Seniors – West Covina vs. SCAG Region



Source: American Community Survey 2014-2018 5-year estimates.

Table 3-4 Disability by Employment Status – West Covina

	With a Disability	Percent of Total	No Disability	Percent of Total
Employed	1,695	35%	47,582	76%
Unemployed	205	4%	3,375	5%
Not in Labor Force	2,894	60%	11,948	19%
Total	4,794	-	62,905	-

American Community Survey 2014-2018 5-year estimates.

According to the Department of Social Services there are approximately 22 residential care facilities in West Covina to serve the needs of those with disabilities. Both the federal Fair Housing Act and the California Fair Employment and the Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The City Zoning Code establishes a formal procedure to consider applications for reasonable accommodation.

3.7.5 Developmental Disabilities

According to Section 4512 of the Welfare and Institutions Code, a “Developmental disability” means a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual which includes mental disability, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to mental disability or to require treatment similar to that required for individuals with mental disabilities but shall not include other handicapping conditions that are solely physical in nature.

Many persons with developmental disabilities can live and work independently within a conventional housing environment. More severely affected individuals may require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, a major issue in supportive housing for persons with a developmental disability is the transition from the person’s childhood living situation to an appropriate level of independence as an adult.

The State Department of Developmental Services (DDS) provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. The San Gabriel/Pomona Regional Center is one of 21 regional centers in the State of California that provides point of entry to services for people with developmental disabilities. The center is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families. Table 3-5 shows recent data regarding persons with a developmental disability in the City of West Covina.

Table 3-5 Developmental Disabilities – West Covina

By Residence	
Home of Parent/Family/Guardian	981
Independent/Supported Living	79
Community Care Facility	182
Intermediate Care Facility	49
Foster/Family Home	26
Other	5
By Age	
0-17 years	1,322
18+ years	558
Total	3,202

CA DDS consumer count by CA ZIP as reported by SCAG, June 2019.

To address the housing needs for persons with developmental disabilities, the Housing Plan includes Program 4.2 – Housing for Persons with Special Needs. The City will continue to coordinate with the San Gabriel/Pomona Regional Center and encourage housing providers to designate a portion of new affordable housing developments for persons with disabilities, especially persons with developmental disabilities, and pursue funding sources designated for persons with special needs and disabilities.

3.7.6 Extremely-Low-Income Households

Extremely-low-income is defined as households earning 30 percent or less of the area’s median income, or a maximum of \$35,750 for a household of four in Los Angeles County in 2022/2023. For purposes of meeting the Regional Housing Needs Assessment (RHNA) inventory, 50 percent of the very-low-income need is assumed to be extremely-low-income, which represents 827 additional housing units during the 2021-2029 planning period, as shown in Table 3-8. Households with extremely low incomes have a variety of housing situations and needs. For example, most families and individuals receiving public assistance, such as social security insurance (SSI) or disability insurance are considered extremely low-income households. Some extremely low-income households overlap with other particular housing needs, such as disability, large families, or female-headed households with children.

Extremely low-income households make up 21 percent of renters in the city, but only 36 percent of households in West Covina are renters. Therefore, extremely low-income households are more likely to rent their homes. Extremely low-income households that rent were more likely to experience housing cost burden or face overpayment than owner households, making extremely low-income households in greater need of affordable housing.

Most rentals in the city are financially out of reach for many extremely-low-income households. Large subsidies are needed to make housing affordable for extremely-low-income households. Due to the high cost of housing relative to their incomes and the overlap with other housing needs that may further limit housing options, extremely-low-income households are particularly vulnerable to a range of problems including overpayment, overcrowding, displacement, and homelessness. HUD’s CHAS dataset

provides information on extremely-low-income households in West Covina. Table 3-6 provides a breakdown of households by income category, tenure, and degree of overpayment. This table shows that households in the lowest income categories, especially renters, experience a very high level of cost burden.

Race and ethnicity differences are also apparent with extremely low-income household characteristics. According to SCAG tabulations, the race/ethnicity with the highest share of extremely-low-income households in West Covina is Black, non-Hispanic (16.9 percent compared to 13.7 percent of total population). In the SCAG region, the highest share of extremely-low-income households is Black, non-Hispanic (27.1 percent compared to 17.7 percent of total households).

Table 3-6 Extremely-Low-Income Households by Tenure – West Covina

	Cost Burden >30%	Cost Burden >50%	Total
Income by Cost Burden (Renters Only)			
Household Income less-than or = 30% HAMFI	1,970	1,760	2,300
Household Income >30% or less-than or = 50% HAMFI	1,810	1,175	2,045
Household Income>50% to less-than or= 80% HAMFI	1,355	255	2,150
Household Income >80% to less-than or= 100% HAMFI	255	15	1,275
Household Income >1--% HAMFI	115		3,175
Total	5,505	3,205	10,945
Income by Cost Burden (Owners Only)			
Household Income less-than or = 30% HAMFI	965	805	1,305
Household Income >30% or less-than or = 50% HAMFI	1,100	760	1,690
Household Income>50% to less-than or= 80% HAMFI	1,850	755	3,180
Household Income >80% to less-than or= 100% HAMFI	955	140	2,145
Household Income >1--% HAMFI	1,345	175	11,245
Total	6,215	2,635	19,570

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

It can be difficult to address the diverse housing needs of extremely low-income households in West Covina. However, the specialized needs of extremely low-income households are taken into consideration and are addressed through the City’s affordable housing programs in the 2021-2029 Housing Element, specifically with Program 4.2 – Housing for Persons with Special Needs. The City will continue to employ programs to support affordable housing, pursue funding opportunities that prioritize extremely low-income groups, as well as encourage and incentivize development and preservation of affordable housing to address the wide range of needs of extremely low-income households for future years.

3.7.7 Homelessness

Homelessness continues to be a local and national issue. Enumerating the total number of persons experiencing homelessness within the city is difficult due to the transient nature of the population, and what can be referred to as the ‘hidden homeless’. ‘Hidden homeless’ refers to individuals that are not necessarily located in public spaces and are often not counted in homeless surveys. These individuals typically reside in temporary housing situations such as living with another household or residing in hotels or motels.

To better address and serve the homeless population, the Los Angeles Homeless Services Authority (LAHSA) was established in 1993 as an independent agency by the County and the City of Los Angeles. LAHSA periodically conducts a point-in-time survey to count the number of homeless individuals, sheltered or unsheltered, living throughout Los Angeles County. West Covina is within LAHSA's Service Planning Area (SPA) 3. The most recent LAHSA data available for the City of West Covina (February 2022) estimated that there were approximately 4,661 persons experiencing homelessness in SPA-3 and 112 of those persons within the city itself.

There are numerous factors that might contribute to homelessness in West Covina; difficulties in obtaining employment, insufficient education, mental illness, and substance abuse are a few factors. Rising housing costs and limited availability of affordable housing has undoubtedly contributed to homelessness. Due to the increase of individuals experiencing homelessness or at-risk of becoming homeless, there is disproportionate need for affordable housing and housing services.

Services and facilities available for the individuals experiencing homelessness in West Covina are primarily coordinated through the Los Angeles County Continuum of Care initiative. The comprehensive homeless service system assesses the needs of the homeless individual or family, provides referrals to permanent or transitional housing, and provides services to facilitate independent living. Local emergency shelters, low barrier navigation centers, and transitional or supportive housing also help to address the needs of the homeless. The following agencies offer homeless assistance in West Covina and surrounding areas of LA County:

- Citrus Valley Health Foundation provides a drop-in center where homeless persons can access a wide variety of services. The Foundation also serves the terminally ill and those in need of short-term acute care.
- The Institute for Urban Research and Development provides emergency shelter, breakfast and dinner, access to showers and toilets, limited case management services, and referrals to more comprehensive services to homeless families. IURD is housing participants at the Valley Inn in La Puente and the American Inn & Suites in Pomona.
- Catholic Charities Brother Miguel Center in Pomona provides vouchers/assistance referrals for those seeking shelter. They also provide utility disconnection and eviction prevention services, along with other counseling, training, and emergency/food assistance.
- YMCA-Wings Shelter for Battered Women located in West Covina provides shelter, counseling, and other needs of battered women and their children.
- The House of Ruth in Claremont provides services to women and their dependent children.
- Community Food Bank of West Covina provides assistance and emergency help for West Covina residents in need of food.

- The Salvation Army offers temporary shelter and food vouchers and referrals for West Covina and San Gabriel residents. Adult rehabilitation centers are among the most widely known of all Salvation Army services and comprise the largest resident rehabilitation program in the United States. Individuals with identifiable and treatable needs are able to check-in to facilities that assist them in becoming healthy. At the center they receive adequate housing, nourishing meals and necessary medical care, and they engage in work therapy. They also benefit from group therapy, spiritual guidance and skilled addictions counseling in clean and wholesome surroundings.
- Inland Valley Council of Churches serves homeless families through their emergency shelter and transitional housing programs. Those in need of shelter are able to stay a maximum of 30 days while those using the transitional housing are able to stay between 12 and 24 months.
- The Santa Anita Family Services Senior Center serves low-income elderly with temporary personal care, in-home care during illness, respite for family caregivers, employment assistance, housekeeping, and assistance in filling out forms or with other legal matters. They also offer minor home renovation for low-income seniors with physical limitations.
- The East San Gabriel Valley Coalition for the Homeless is a nonprofit organization, helping the homeless find shelter. They offer referral services for medical appointments, hotel and motel and taxi vouchers, emergency food, sack lunches, showers and hygiene kits. They also offer referral assistance for paying rent and utilities. The Coalition also offers a Cold Weather Shelter that runs from mid-November until the end of March.

The City's zoning regulations related to facilities serving the homeless, including emergency shelters, low barrier navigation centers, transitional housing and supportive housing, are discussed in Section 4.

3.7.8 Farmworkers

The City of West Covina's economy was at one time largely linked to agriculture. Changes in the local and regional economy to more production and service-oriented sectors have drastically reduced agricultural production within city limits. The Census of Agriculture from the US Department of Agriculture (USDA) documented that out of California's approximate 377,500 agricultural workers, 3,266 workers (less than 1 percent) were located within Los Angeles County as of 2017. While Los Angeles County still has areas with agricultural activity, farmland in West Covina has been almost entirely converted. Consequently, recent Census estimates reported 224 total jobs in the farming, fishing and forestry occupations held by West Covina residents, of which 164 were full-time year-round jobs (Table 3-7). It can be difficult to estimate the true number of agriculture workers as many are seasonal, migrant, or undocumented. Although farmworkers represent a small percentage of residents in the city, many are subject to low wages and can be classified as low- or extremely-low-income, or work seasonal jobs, which can lead to overcrowding or substandard living conditions

putting them at disproportionate need for affordable housing. City regulations regarding farmworker housing are discussed in Chapter 4.

Table 3-7 Agricultural Employment – West Covina

West Covina	Percent of Total West Covina Workers	SCAG Total	
Farmworkers by Occupation			
224	0.43%	57,741	Total jobs: Farming, fishing, and forestry occupations
164	0.45%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations
Employment in the Agricultural Industry			
293	0.57%	73,778	Total in agriculture, forestry, fishing, and hunting
267	0.74%	44,979	Full-time, year-round in agriculture, forestry, fishing, and hunting

Source: American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.

3.8 Housing At-Risk of Conversion to Market Rate

Under State housing law government-assisted low-income rental units that are eligible for conversion to market rate housing during the 2021 to 2029 period are considered “at-risk.” Reasons for this conversion may include expiration of subsidies, mortgage pre-payments or pay-offs, and concurrent expiration of affordability restrictions. Table 3-8 shows assisted low-income rental units in West Covina. Of the 1,013 affordable units, 431 are targeted for seniors, two of these projects are at-risk of conversion to market rate as the affordability end year falls within the 2021-2029 housing element cycle.

Table 3-8 Affordable Housing Projects – West Covina

Project	Project Type	Total Affordable Units	Funding Source	Expiration Date	At Risk?
Brookhollow Apartments 2600 S. Azusa Ave.	Non-targeted	85	LIHTC	2053	No
Heritage Park Senior Community 1800 W. Badillo St.	Senior	14	Local	In Perpetuity	No
Mauna Loa Apartments 2000 W. Pacific Ave.	Non-targeted	12	Local	2029	Yes
Mountain Shadow Apartments 2775 E. Valley Blvd.	Non-targeted	84	HUD	2022	Yes
Lark Ellen Village 1350 E San Bernardino Rd.	Large family	122	LIHTC; HUD; CalHFA	2037	No
The Promenade 1333 W Garvey Ave N.	Non-targeted	123	LIHTC	2070	No
Vintage Gardens 1950 Badillo St.	Senior	186	LIHTC	2054	No
West Covina Senior Villas I 1842 E. Workman Ave.	Senior	85	CalHFA	2035	No
West Covina Senior Villas II 1838 E. Workman Ave.	Senior	64	CalHFA	2102	No
Cameron Park 929 W. Cameron Ave.	Non-targeted	156	LIHTC; HUD	2073	No
Olive Tree Terrace 721 N. Azusa Ave.	Senior	82	HUD	2040	No

Source: California Housing Partnership Corporation; City of West Covina, 2023.

At-Risk Status

Two Developments are affordable housing projects that are considered at risk: Mountain Shadows – with 84 lower-income units is at risk of converting to market rate during the 2021 to 2029 period and Mauna Loa – with 12 units at risk of converting to market rate during the 2021 to 2029 period.

Preservation and Replacement Alternatives

Options for preserving or replacing at-risk units are described below. The cost to preserve affordable multiple-family housing depends on market rents, availability of funding sources, and the administrative capacity of housing organizations.

Project Acquisition

The estimated market value of 96 at-risk units is approximately \$23 to \$29 million. The actual property values will depend on market conditions, property conditions, and other factors.

Purchase of Affordability Covenants

As an alternative to project acquisition, the affordability of at-risk projects could be extended through the purchase of affordability covenants. Based on current market conditions, the estimated cost of purchasing affordability covenants ranges from \$400,000 to \$725,000 per unit, or a total cost of approximately \$38 to \$70 million.

Rental Subsidies

The third option for preserving affordable units is to provide rental assistance. Rent subsidies could be structured similar to the Section 8 program, where HUD pays the difference between what tenants can afford (defined as 30 percent of household income) and HUD's estimates of the fair market rent. The feasibility of this alternative is highly dependent upon the availability of reliable funding sources necessary to make rent subsidies and the willingness of property owners to participate in the program. The cost of subsidizing rents for 96 at-risk units is estimated to be approximately \$4.5 million per year.

Construction of Replacement Units

The construction of new low-income housing units is a costly means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends upon a variety of factors, including density, unit size, location, land costs, and type of construction. Assuming an average construction cost of \$400,000 per unit (including the cost of land), the total cost of developing 96 new low-income units is estimated to be approximately \$38 million.

Resources for Preserving At-Risk Units

A variety of federal, state, and local programs are available to maintain affordability of at-risk units (see also the Resources chapter of this Housing Element). After the State’s elimination of redevelopment agencies, the City has no financial resources available for this purpose. Entities with the ability to acquire or manage affordable housing in the San Gabriel Valley include National CORE, the East Los Angeles Community Union (TELACU) and Thomas Safran & Associates.

3.9 Future Housing Needs 2021-2029

The Regional Housing Needs Assessment (RHNA) is a key tool for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for the 2021 to 2029 period, also referred to as the “6th cycle” in reference to the six RHNA cycles that have occurred since the comprehensive revision of State Housing Element law in 1980. Communities then determine how they will address this need through the process of updating the Housing Elements of their General Plans.

The 2021-2029 RHNA Plan was adopted by the Southern California Association of Governments (SCAG) in March 2021. The need for housing is determined by the forecasted growth in households in a community as well as existing needs such as overpayment and overcrowding. The housing need for new households is adjusted to maintain a desirable level of vacancy to promote housing choice and mobility. An adjustment is also made to account for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. Total housing need is then distributed among four income categories on the basis of the county’s income distribution, with adjustments to avoid an over-concentration of lower-income households in any community. Additional detail regarding SCAG’s methodology used to prepare the RHNA can be reviewed on SCAG’s website at <https://scag.ca.gov/rhna>.

The City of West Covina’s RHNA allocation is 5,346 additional housing units during the 2021-2029 planning period, with those units distributed among the four income categories as shown in Table 3-9. The City must demonstrate that its land inventory is sufficient to accommodate the amount of additional housing assigned in the RHNA for each income group (see Chapter 5 and Appendix B).

Table 3-9 Regional Housing Needs Assessment (RHNA) 2021-2029

Income Group	Number	Percentage
Very Low*	1,653	25%
Low	850	16%
Moderate	865	17%
Above Moderate	1,978	42%
Total	5,346	100%

Source: Southern California Association of Governments, 2021.

*It is assumed that 50% (827 units) of the City’s very-low-income RHNA will address the needs of extremely-low-income households, earning less than 30% of the AMI.

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Section 4

Housing Constraints

Constraints to the development of adequate and affordable housing include market, governmental, infrastructure, and environmental factors. These constraints may result in housing that is not affordable to low- and moderate-income households and may render residential construction economically infeasible for developers. Constraints to housing production significantly impact households with low and moderate incomes and special needs.

While the City may adopt programs and policies to provide adequate and affordable housing, there are a variety of constraints outside of the City's control that could inhibit development. Pursuant to Government Code 65583, a Housing Element shall provide an analysis of existing and potential governmental and non-governmental constraints on the improvement, maintenance, and development of the housing stock. This section provides an analysis of local housing constraints for all income levels and special needs of the population, including extremely low-income households, the homeless, disabled, and elderly. Where barriers to adequate housing production are identified, local governments must adopt goals and policies to mitigate these constraints. This analysis of considers the following potential constraints:

- Governmental Constraints, or regulations, ordinances, and/or controls that may impede the development of new housing or otherwise increase the cost of residential development.
- Market Constraints are economic and market factors, such as construction and materials costs, that may affect the cost of new housing development.
- Environmental Constraints, or aspects of the environment (e.g., vacant land, utilities, natural hazards) that may affect the cost and/or feasibility of development.

The constraints identified in this chapter were used to develop specific policies and actions included in the Housing Plan to remove barriers to housing and to incentivize housing production, specifically targeting housing production for all income levels and housing for persons with special needs.

4.1 Summary of Local Housing Constraints

- The cost of developing housing, including land costs and construction costs, are rising rapidly. There is a lack of federal, state, and local funding and the funding that is available is increasingly competitive. The time and effort needed to identify, compete for, and layer affordable housing funds is a major constraint to development of affordable housing.
- The City's Reasonable Accommodation procedures include subjective findings which may make it difficult to provide accommodations for people with disabilities.
- West Covina's development regulations allow for a variety of densities development standards are sufficiently flexible to not pose a constraint to development. However, the majority of the city is zoned for single-family use, which could pose a constraint to the development of multi-family housing.
- West Covina's development review and impact fees are in line with the region. While any fee poses a constraint to development, fees used to review, approve, and inspect new development projects and impact fees used to construct and upgrade roadways, bicycle, and pedestrian facilities, to upgrade and install utility infrastructure, and to build, expand, and maintain parks, schools and affordable housing are essential to provide safe, equitable, and livable places.
- Black mortgage applicants are denied at a rate more than seven percentage points higher than white applicants, and Hispanic applicants are denied at a rate more than five percentage points higher than non-Hispanic applicants. This indicates a financial constraint to purchasing a home for certain races, which puts higher pressure on the rental markets.
- The costs of developing housing, including land costs and construction costs, are rising rapidly. There is a lack of federal, state, and local funding and the funding that is available is increasingly competitive. The time and effort needed to identify, compete for, and layer affordable housing funds is a major constraint to development of affordable housing.

4.2 Governmental Constraints

Local governments have little influence on federal monetary policies or national economic forces, yet these factors carry substantial weight on the overall cost of housing. Local policies and regulations can affect the availability and affordability of housing. Land use controls, site improvement requirements, environmental review, permit processing procedures and fees, and state and federal regulations, can affect the maintenance, development, and improvement of housing. Part of the Housing Element's purpose is to require local governments to evaluate their past performance in this regard. By reviewing local conditions and regulations that may impact the housing market, the local government can prepare for future growth through actions that address housing needs for its diverse population, address public health and safety, and facilitate reducing the cost of housing production.

The City of West Covina’s regulations are designed to balance community standards and quality and development needed to meet housing needs. The City’s primary policies and regulations that affect residential development and housing affordability include land use controls, development processing procedures and fees, impact fees, on- and off-site improvement requirements, building and housing codes, and code enforcement. This section discusses these policies and regulations and assesses whether any serve as a governmental constraint to the production of housing. This section also analyzes the potential and actual constraints upon the development, maintenance, and improvement of housing for persons with disabilities.

4.2.1 Land Use Controls

Land use controls are policies, regulations, plans, and other methods of regulating the possible uses and development of property. Land use designation including zoning, subdivision regulations, parking and open space requirements could all be considered constraints. The two primary regulatory documents in West Covina are the General Plan and Zoning Code (Title 26 of the Municipal Code).

General Plan

The General Plan, required by Government Code §65000 et seq., is a comprehensive, long-range policy document that guides physical development in West Covina. The Land Use Element of the General Plan provides the long-term vision and direction for land uses and development through a series of goals, policies, and implementation measures. The Land Use Element has a direct relationship with allowable uses of property and development standards and determines the distribution, density, and location of development in the city.

In 2016, the City adopted a comprehensive update to the General Plan, known as *Plan WC*. The City also adopted of the Downtown Specific Plan that includes a Transect Zone land use system, which identifies natural-to-urban transect zones or “human habitats.” These transect categories reflect how intensely land is used, how buildings relate to streets and open space, and how neighborhoods are laid out.

There are seven General Plan designations within the West Covina General Plan. These land use categories define a broad range of allowable uses and some building densities throughout the city. The various types of housing units allowed in the city include single-family dwellings, multi-family dwellings, condominiums, mobile homes, and accessory dwelling units (ADUs). Residential land use designations express densities as dwelling units per acre (du/ac). Residential densities in West Covina cover a wide spectrum that promote the development of various housing types, as demonstrated by the General Plan designation density ranges shown in Table 4-1.

Table 4-1 General Plan Designations and Corresponding Transect Zones

Designation	Description	Density (du/ac)
Neighborhood Low	Emphasizes detached houses with some attached units in a small mix of building types. Predominantly residential, with opportunity for limited home occupation and neighborhood services sensitively located along corridors and at intersections.	0 - 8
Neighborhood Medium	Anticipates a mixture of detached and attached dwellings and higher building types. Predominantly residential with small scale commercial at key locations, primarily at intersections and adjacent to corridors.	9 – 20
Neighborhood High	Accommodates a broader mix of building types, primarily attached. A mix of residential, commercial, office, and entertainment that includes mixed-use buildings.	21 - 54
Commerce	Encourages a wide range of building types of anywhere from two to six stories (depending on neighborhood characteristics) that house a mix of functions, including commercial, entertainment, office and housing.	21 -54 (Downtown Plan) 9 – 20 (Outside Downtown)

Source: General Plan, Land Use Element, 2016.

West Covina’s land use designations allow for a range of 1 to 54 dwelling units per acre. According to the State, a density of at least 30 dwelling units per acre is the thresholds for densities to encourage the development of lower-income units in metropolitan jurisdictions such as West Covina.¹ Density ranges in Neighborhood High and Commerce districts accommodate this threshold. However, the majority of the city is designated as Neighborhood Low. Areas that are designated Neighborhood High and Commerce, which permit the highest density housing, are clustered primarily along areas adjacent to I-10.

Zoning Code

The City regulates the type, location, density, and scale of residential development primarily through the Zoning Code, as well as different specific plans. State law (Government Code §65454) requires that a City’s General Plan and Zoning Code be consistent. This is critical because zoning regulations serve as a key General Plan implementation tool. The West Covina Zoning Code accommodates a diversity of residential housing types. The Code allows for innovation in design, provided that the development meets the development standards by zone. The West Covina Zoning Code allows residential in the following zones:

- **Residential Agricultural (R-A):** The purpose of the residential agricultural zoning district is to provide residential areas within the city that allow varying densities of single-family homes and other compatible uses where limited numbers of livestock may be raised, crops may be grown, and where regulations promote and encourage a suitable environment for family life on large parcels of land.

¹ HCD. Default Density Standard Option – 2020 Census Update. <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/defaultdensity2020censusupdate.pdf>, accessed September, 2023.

- **Single Family Residential (R-1):** The purpose of the single-family residential zoning district is to provide residential areas within the city that allow varying densities of single-family homes and other compatible uses. The district shall promote a suitable living environment by maintaining orderly flow of traffic and restricting traffic from other sources, providing space for community facilities that are complementary to residential areas and minimizing noise and disturbances in residential neighborhoods. There are six sub-zones within the R-1 district, which correspond to the minimum lot areas:
 - R-1-6,000
 - R-1-7,500
 - R-1-9,450
 - R-1-14,400
 - R-1-20,000
 - R-1-40,000

- **Multi-Family Residential (MF):** The purpose of the multi-family residential zoning districts is to provide residential areas within the city that allow varying densities of multi-family homes where development is permitted with a relatively high concentration of dwelling units with amenities that promote a safe and healthy environment for existing and future residents. There are four sub-zones within the MF district, which correspond to the maximum dwelling units per net acre:
 - Low Density Multi-Family, Condominium Zone (MF-8)
 - Low-Medium Density Residential (MF-15)
 - Medium Density Residential (MF-20)
 - High Density Residential (MF-45)

- **Office Professional Mixed Use (O-PMU):** The purpose of the office-professional mixed-use zone is to classify and set standards for those business, office, administrative or professional land uses which by their nature are of relative low intensity and therefore, when properly located and designed are compatible with adjacent residential zoning and the development therein. This Mixed-Use zone also allows for residential uses up to 20 units per gross acre.

- **Neighborhood-Commercial Mixed-Use (N-CMU):** The purpose of the neighborhood-commercial mixed-use zone is to classify and set standards for those retail and service commercial uses which by their nature are of moderate intensity; are necessary in order to provide convenient daily shopping facilities to residential home and apartment dwellers; and are generally adjacent to or within close proximity to residential zoning or development and, therefore, require extraordinary physical treatment in order to guarantee compatibility with and protection to surrounding properties and their values. This Mixed-Use zone also allows for residential uses up to 20 units per gross acre.

- **Regional-Commercial Mixed-Use (R-CMU):** The purpose of the regional-commercial mixed-use zone is to classify and set standards for a regional business center which provides a complete line of shop and store types, eating and entertainment facilities, business and financial services and multi-family residential uses. The dominant establishments are one or more department stores flanked by specialty shops. This Mixed-Use zone also allows for residential uses up to 20 units per gross acre.
- **Service-Commercial Mixed-Use (S-CMU):** The purpose of the service-commercial mixed-use zone is to classify and set standards for those retail and service commercial, recreational, business office and multi-family residential land uses which by their nature are of a relative high intensity; are unique in that their success depends upon direct motorist exposure and excellent access; require special traffic circulation patterns that will not unduly restrict rapid traffic flow and extraordinary physical treatments in order to create compatibility with adjacent zoning and the development thereon. This Mixed-Use zone also allows for residential uses up to 20 units per gross acre.

Zoning regulations establish standards for the density, lot area, floor area ratio, lot coverage, yard setbacks, structure height, minimum open space and minimum parking spaces. The allowable densities of the zones range from one unit per acre to 54 units per acre and have a direct effect on the amount of housing units that can be developed on a parcel. Development standards may be considered a constraint to the development of housing units if they are too restrictive or reduce the development potential on a specific parcel.

The City's Zoning Code allows for a variety of housing types. The Residential Agriculture and Single-Family Residential zones only permit by-right single-family homes, while Multi-Family Residential permits multifamily homes, but not single-family homes. Zones that permit multifamily homes are located primarily along busy roadways, including I-10, Azusa Avenue, Glendora Avenue, and Sunset Avenue. However, the majority of the city is zoned for Single-Family Residential.

West Covina Development Code Update

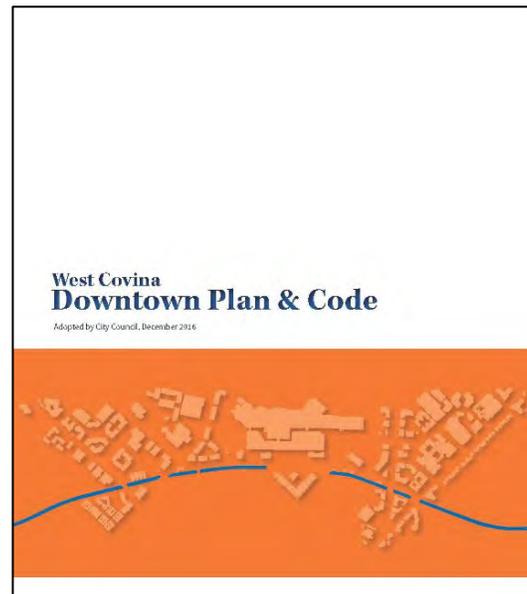
The West Covina Development Code Update, anticipated to be adopted in January 2024, will update two sections of the City's Municipal Code, the Subdivision Code (Title 20) and the Zoning Code (Title 26). These sections of the Municipal Code regulate how construction projects are processed and what requirements they must adhere to. These projects can range from small additions onto single-family homes to new shopping centers. The goal of this effort was to create a streamlined development code that establishes clear and concise regulations for property owners, architects, and developers. The new code will eliminate outdated rules and regulations, will provide regulations for new uses, and update the Code for consistency with the City's Housing Element and recent State legislation. More specifically, the Zoning Code Update will make the following actions:

- Eliminate Area Districts and incorporate those development standards into the underlying zone.
- Reassign zones not widely used in the code (e.g., Planned Industrial zone [I-P]).

- Reduce the reviewing authority of parcel maps (subdivisions of four parcels or less) from the Planning Commission to the Community Development Director.
- Incorporate the recently adopted Mixed-Use Overlay requirements into the existing commercial zoning regulations.
- Increase parking lot landscape requirements for multi-family residential, commercial and industrial zones from one tree per 10 parking spaces and eight percent of parking lot to either: a) one tree per six parking spaces and eight percent of the parking lot, OR b) one tree per 10 spaces and 12 percent of parking lot.
- Require the use of recycled water for irrigation purposes, provided there is adequate capacity to serve the site.
- Update standards for garden and retaining walls.
- Update the Density Bonus Ordinance for consistency with State Law and define concessions and waivers.
- Eliminate the Large Home and Large Addition processes for single-family residential units.
- Update Large Family Daycare facilities to be permitted by-right, consistent with State Law.
- Incorporate minimum parking stall and aisle dimensions.
- Increase multi-family guest parking requirement from 10 percent of the required spaces (for apartments) or one space per five units (condominiums) to spaces per four units.

Downtown Plan and Code

A primary focus of the General Plan to encourage the redevelopment and improvement of the City's Downtown, which includes the Plaza West Covina shopping mall, located south of Interstate 10. In 2016 the City adopted the *Downtown Plan & Code*, which presents a community-led vision and development standards for revitalization of the Downtown area. The development standards in the Downtown Plan encourage and facilitate the development of higher-density residential infill and mixed-use projects by allowing reduced parking requirements and deviations from the standards typically required in multi-family residential zones. Table 4-3 presents the development standards in the Downtown Plan & Code. Because the Downtown Plan utilizes form-based standards, no maximum densities or floor area ratios are established although the General Plan identifies residential densities up to 54 units/acre for the Downtown.



4.2.2 Development Standards

The City regulates the location, density, and scale of development through development standards in the City's Zoning Code. Table 4-2 outlines the development standards in residential districts in the City's Zoning Code that allow residential development as a primary or supported use. Table 1-3 compares residential development standards between the cities of West Covina, Baldwin Park, and Pomona.

Table 4-2 Development Standards for Single-Family Residential by Area District

Zone	du/ac	Minimum Lot Size			Lot Coverage	Maximum Height	Minimum Yard Setbacks (ft)		
		Width (ft)	Depth (ft)	Area			Front	Side	Rear
R-A	5.8	-	-	6,000 sqft	2,500 sqft plus 30 percent of lot area	25 ft/two stories	25	5	15
R-1-6,000	7.25	50	95	6,000 sqft	2,500 sqft plus 30 percent of lot area	25 ft/two stories	25	5	15
R-1-7,500	5.8	60	105	7,500 sqft	2,800 sqft plus 20 percent of lot area	25 ft/two stories	20	5	25
R-1-9,450	4.6	70	110	9,450 sqft	3,100 sqft plus 20 percent of lot area	25 ft/two stories	25	5	25
R-1-14,400	3	90	125	14,400 sqft	3,600 sqft plus 20 percent of lot area	25 ft/two stories	25	7	25
R-1-20,000	2.2	110	-	20,000 sqft	3,600 sqft plus 20 percent of lot area	25 ft/two stories	25	7	25
R-1-40,000	1	130	-	40,000 sqft	3,600 sqft plus 20 percent of lot area	25 ft/two stories	25	10	25
MF-8	8	150	-	2 acres	45 percent	30 ft 25 ft w/in 100 ft of R-A and R-1 zones	15	10	20
MF-15	15	150	-	1 acre	55 percent	45 ft 25 ft w/in 100 ft of R-A and R-1 zones	15	10	20
MF-20	20	150	-	1 acre	55 percent	45 ft 35 ft w/in 100 ft of R-A and R-1 zones	15	10	20
MF-45	45	100	150	20,000 sqft	70 percent	55 ft 40 ft w/in 100 ft of R-A and R-1 zones	15	5 ft: two story 10 ft: 3 or more stories	15
O-PMU	20	70	140	15,000 sqft	50 percent	45 ft ¹	15	10 (interior)/15 (street) ²	15 ²
N-CMU	20	70	140	15,000 sqft	50 percent	45 ft ¹	15	10 (interior)/15 (street) ₂	15 ²
R-CMU	20	-	-	30 acres	50 percent	45 ft ¹	15	10 (interior)/15 (street) ₂	15 ²
S-CMU	20	100	140	15,000 sqft	50 percent	45 ft ¹	15	10 (interior)/15 (street) ₂	15 ²

Source: City of West Covina, 2023.

Notes:

1. Applies to all residential buildings, except within the area bounded by Citrus Street to the west, Workman Street to the north, Barranca Avenue to the east, and the Interstate 10 to the south (also known as Eastland Center) shall have a maximum building height of seven (7) stories or eighty-five (85) feet.
2. When abutting R-A, R-1, or single-family residential use, side and rear setbacks are as follows: 1-story – 15 ft, 2-story – 25 ft, 3-story – 40 ft.

Table 4-3 Downtown Plan Development Standards

Transect Zone	T-5 Urban Center	T-4 General Urban	T-4 Urban Neighborhood
Allowed Building Types	Flex building Hybrid court Liner Live-work	Flex building Hybrid court Liner Live-work	Court Live-work Row-house Rosewalk court Bungalow court Duplex/Multiplex
Setbacks from Property Line			
Primary Street	0'-10'	0'-10'	15'-35'
Side street	0'-10'	0'-10'	10'-15'
Side Yard	0'	0'	5'
Rear Yard (no alley – with alley)	5'-15'	5'-15'	20'
Building Height			
Minimum	1 story/24'	1 story/24'	1 story/18'
Maximum	5 stories/70'	3 stories/40'	3 stories/40'
Site Width/Depth			
Minimum	25' /100'	25' /75'	50' /95'
Maximum	200' /200'	150' /150'	200' /150'
Parking			
Residential Uses: 0-1 bedroom	1.5 space/unit	1.5 space/unit	1.5 space/unit
Residential Uses: 2+ bedrooms	2 spaces/unit	2 spaces/unit	2 spaces/unit
Non-residential uses	65% of Municipal Code parking requirements		

Height

West Covina’s Zoning Code establishes maximum height requirements for each zone. As shown in Table 4-2, the city’s Single-Family Residential zones have a maximum height limit of 25 feet and are limited to two stories. Multi-Family Residential zones have a maximum height ranging from 30 feet in to 55 feet in areas not within 100 feet of Single-Family Residential zones, and between 25 and 40 feet in areas within 100 feet of Single Family Residential zones. However, in the case where there is a difference in site elevation and the abutting property zoned single-family is of such elevation that its view will not be impeded, at the discretion of the planning commission, the maximum building height limit may be waived. In O-PMU, N-CMU, R-CMU, and S-CMU zones residential building heights are limited to 45 feet, except in the Eastland Center, where building heights can go up to seven stories or 85 feet.

The height limits in the City of West Covina are lower than nearby jurisdictions of Baldwin Park and Pomona in Single-Family Residential zones, but similar in Multi-Family Residential zones, as shown in Table 4-4. The City of West Covina City has slightly lower height limits in both higher and lower density Multi-Family zones compared to the City of Pomona, but higher height limits than the City of Baldwin Park. As a result, height requirements do not pose a constraint to development.

Table 4-4 Residential Development Standards Comparison

Residential District*	Development Standard	City of West Covina	City of Baldwin Park	City of Pomona
Single-Family Residential	Maximum Density	1-7.8 du/ac	1-8.7 du/ac	2-7.8 du/ac
	Front Setback	25 feet	20 feet	25-30 feet
	Maximum Height	25 feet	27 feet	35 feet
Lower-Density Multi-Family Residential	Maximum Density	8-15 du/ac	12 du/ac	7-15 du/ac
	Front Setback	15 feet	15 feet	25 feet
	Maximum Height	25 - 45 feet	27 feet	35 feet
Higher-Density Multi-Family	Maximum Density	20-40 du/ac	20 du/ac	30-70 du/ac
	Front Setback	15 feet	15 feet	25 feet
	Maximum Height	35 – 55 feet	35 feet	35-65 feet

Source: City of West Covina Zoning Code; City of Baldwin Park Zoning Ordinance; City of Pomona Zoning Ordinance.
 Note: The City of Baldwin Park and the City of Pomona were selected as a comparison due to their similar size and location.

Density

West Covina’s Zoning Code provides for a range of residential densities. As shown in Table 4-2, the R-A zones permit 5.8 dwelling units per acre. The R-1 zones allow for one to 7.25 units per acre. In Multi-Family Residential zones, densities range from eight dwelling units per acre in MF-8 zones, 15 units per acre in MF-15 zones, 20 units per acre in MF-20 zones, and 45 units per acre in MF-45 zones. Within Mixed-Use zones, the maximum density is 20 units per gross acre along with a commercial requirement. The majority of the city is comprised of Single-Family Residential, which does not permit multi-family units. However, with implementation of SB 9, residential zones will also allow two units per lot and lot splits. Because two units are allowed on each lot, a total of four units could be permitted. One ADU would also be permitted on each of the two lots. As a result, the Low and Medium Density districts do not overly constrain housing development.

As shown in Table 4-4, density ranges are similar to the City of Baldwin Park and the City of Pomona in Single-Family and lower density Multi Family Residential zones. The City of West Covina has a lower density range in higher density Multi Family Residential compared to the City of Pomona, but a higher density range than the City of Baldwin Park.

Parking Requirements

City parking standards for residential developments are tailored to the vehicle ownership patterns associated with different residential uses. Parking is very expensive and can consume valuable space that could be used for additional housing or amenities such as common or private open space.

The Zoning Code requires parking based on the number of dwellings on the property. As shown in Table 4-5, the City has established the following minimum parking requirements:

Table 4-5 West Covina Parking Requirements by Residential Use

Housing Type	Parking Requirements
Single-family dwelling	Four or fewer bedrooms: 4 spaces, 2 of which shall be enclosed within a garage; Greater than four bedrooms: one additional garage space shall be required for every two additional bedrooms exceeding the fourth bedroom.
Multi-family dwelling- (non-condominium)	2 spaces for each unit, plus 1 guest space for each 4 units.
Multi-family, mixed-use	1 covered parking space per studio unit; 1.5 covered spaces per 1-bedroom unit; 2 spaces covered per 2-bedroom or larger unit; and 1 guest space for each 4 units.
Live/Work units	2 spaces, plus 1 guest space for each 2 units.
Condominiums	2 spaces for each unit, plus 1 guest space for each 4 units or as required by CUP.
Group home / facilities, and other special group residences	Six or fewer residents: See single-family dwelling parking. Seven or more residents: 1 space for each 2 residential units and an additional 1 space for guests and employees.
Senior Housing	(A) 0 to 1 bedroom: 1 onsite parking space. (B) 2 to 3 bedrooms: 1.5 parking spaces. (C) 4 bedrooms or more: 2.5 parking spaces. (D) or as required by CUP.
All residential uses within the Downtown Plan area	1.5 spaces per studio or one bedroom unit 2 spaces per 2+ bedroom unit

The City’s parking requirements are typical of suburban communities; however, the required number of resident parking is higher than what is typically seen in similar size cities. The City requires a greater amount of guest and off-street parking in new developments to ensure that public streets remain open and free of an overabundance of parked vehicles.

While the City’s multi-family parking requirements may appear to make it more difficult to accommodate affordable housing, the standards have not prevented the development of high-density multi-family projects in recent years. Generally, the precise impact on the number of units and affordability will depend on project location, whether the project is restricted to seniors only, and the unit mix (studios, one-bedrooms, two-bedrooms, etc.). To better facilitate the development of affordable housing, the City has reduced parking standards for senior projects and projects with affordability components on a case-by-case basis when located in proximity to transportation routes and public services. In recent years the City has approved two multi-family housing projects at 65 and 75 units per acre that were granted modified parking standards as well as a number of other modified development standards. The City has also established flexible parking standards for the Downtown, to encourage and facilitate higher-density residential projects within a walkable environment. Residential uses within the Downtown are subject to lower parking requirements.

State Density Bonus Law allows for significant reductions in parking requirements for affordable housing projects meeting the requirements of the Density Bonus Law. No parking requirements may be imposed for 100 percent affordable housing projects near major transit stops. Other projects containing a percentage of affordable units near transit are

subject to no more than one-half space per unit. For all projects meeting the minimum Density Bonus Law standards, no more than 1.5 spaces per two- and three-bedroom units.

As such, the City’s parking requirements do not overly constrain the development of housing.

Open Space Requirements

To improve the character of the city and overall quality of residential neighborhoods, localities typically require dwelling units to maintain a certain percentage of open space that may include yard area, common space and landscaping. In West Covina, open space for single-family homes is regulated through lot coverage, yard coverage and setbacks. Lot coverage and yard regulations that apply to open space in single-family zones are identified in Table 4-2 In multi-family zones, a minimum of 200 square feet per dwelling unit of recreational/leisure space in the form of common and private open space is required.

The recent Zoning Code Update reduced the open space minimums to make open spaces more flexible. The recreational/leisure space must have a minimum dimension of 15 feet width by 15 feet depth for common open space and five feet in depth for private open space. Recreational/leisure space shall be distributed throughout the development and readily accessible from all dwelling units. Communal facilities such as swimming pools, putting greens, court game facilities, recreational buildings, gymnasiums, and other similar facilities may be included areas common open space. Open space requirements could constrain the development of housing the city is largely built out and available land is limited. However, the City’s open space requirements are considered standard for most cities in southern California and do not act as a considerable constraint to housing development. In recent years, several affordable housing projects, including a senior residential facility of 65 units on a 1.05-acre parcel, have been developed that included the required open space minimums and these requirements were not considered to be a constraint to development.

Minimum Floor Area Requirements

The City of West Covina also requires a minimum square footage for multi-family units. As shown in Table 4-6, the minimum floor areas required depend on the unit location and zoning.

Table 4-6 Minimum Floor Area for Multi-family Units by Area District

Minimum Floor Area	Number of Bedrooms					
	Studio	1	2	3	4	More
MF-8	600	900	1,050	1,250	1,650	+200
MF-15	600	800	1,000	1,200	1,350	+150
MF-20	600	725	900	1,100	1,250	+150
MF-45	500	600	800	990	1,125	+125

Source: City of West Covina, 2023

While the minimum floor areas may be greater than the area that is typical for affordable and senior housing, regulating square footage ensures that minimum health and safety requirements are met and that units are able to adequately accommodate families. The ranges allowed are also broad enough to allow for significant variation of unit size and have not constrained the development of affordable housing in the city. Further, the minimum multi-family floor area standards may be modified through the City's density bonus regulations (Municipal Code §26-676, et seq.) for qualifying developments that include affordable housing.

Density Bonus

California law requires jurisdictions to provide density bonuses and development incentives to developers who proposed to construct housing units that are affordable to lower- and moderate-income households. The City adopted a Density Bonus Ordinance in compliance with Government Code Sections 65915 through 65918 to provide a density bonus to projects providing moderate, low, very-low income housing, and senior housing developments pursuant to the Government Code Section 65915. The density bonus ordinance assists in achieving the goals and implementing the policies of the Housing Element and Comprehensive Housing Assistance Strategy. The density bonus allows a developer to increase the density of a residential development above the maximum allowable residential density if the project provides deed-restricted affordable or senior housing.

The West Covina Zoning Code allows a density bonus between 5 percent and 80 percent above the otherwise allowable density at the City's discretion for the following developments:

- More than 50 percent of the total dwelling units are reserved for senior citizens.
- Any combination of dwelling units, meeting or exceeding the minimum percentages specified by the State Density Bonus Law, are affordable to very low- and low-income households and senior citizens.

Developments that are comprised of 100 affordable housing within one-half mile of a high-quality transit stop are allowed an unlimited density bonus.

4.2.3 Zoning for a Variety of Housing Types

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all economic segments of the population. Persons and households of different ages, types, incomes, and lifestyles have a variety of housing needs and preferences that evolve over time and in response to changing life circumstances. This includes single-family homes, multi-family housing, second units, mobile homes, agricultural employee housing, homeless shelters, and transitional housing, among others. Table 4-8 summarizes the various housing types permitted within the City's zoning districts. The housing types allowed within each zoning district are described below.

Mobile Homes/Manufactured Housing

Mobile homes can be an affordable housing option for low- and moderate-income households as the cost of transporting the structure is much lower than a newly constructed home. As shown in Table 4-8, mobile home parks are permitted by right in all multi-family zones as well as OPMU, NMU, RMU, and SMU zones. Government Code §65852.3 requires that mobile homes, or manufactured housing on a permanent foundation be permitted and subject to the same development standards as single-family housing in the same zone. As a result, there are no constraints to the development of mobile homes/manufactured housing.

Accessory Dwelling Unit Requirements

An Accessory Dwelling Unit (ADU) is an attached, detached, or internal residential dwelling unit which provides complete independent living facilities for one or more persons. It includes permanent provisions for living, sleeping, eating, cooking, and sanitation and is located on the same parcel an existing single-family dwelling is situated or will be situated with the proposed development of single-family dwelling(s).

In response to State requirements and local needs, the City allows the development of both attached and detached accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) in all zones that allow single-family and multifamily residential uses, as shown in Table 4-8. ADUs and JADUs can provide an important part of the City's overall strategy for meeting affordable housing needs. In recent years the State Legislature has amended ADU law numerous times to encourage production. The City's regulations are consistent with current State law. Program 3.2 in the Housing Plan describes actions the City will take to encourage and facilitate production of ADUs.

Emergency Shelters

Emergency shelters provide temporary housing for persons experiencing homelessness for a limited period of time. Section 50801 of the Health and Safety Code defines emergency shelters as "housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency due to an inability to pay.

The most recent data available from the February 2022 homeless count estimated approximately 112 individuals experiencing homelessness in the city. The Zoning Code allows emergency shelters with 30 beds or less by-right (i.e., without a conditional use permit or other discretionary action) in the Mixed-Use zones (O-PMU, N-CMU, R-CMU, and S-CMU). Standards for emergency shelters are established in Municipal Code §26-685.7500 and include the following:

- Maximum capacity of 30 occupants. An emergency shelter with a capacity greater than 30 occupants may be permitted subject to the approval of a conditional use permit.
- Maximum stay of 120 days in a 365-day period.

- Minimum distance of 300 feet shall be maintained from any other emergency shelter.
- Bike rack parking included on site.
- Outdoor storage shall be screened from public view by a minimum 6-foot decorative wall or fence.
- Off-street parking at the ratio of 1 space per 4 beds, and/or 0.5 per bedroom designated as a family unit with children, plus 1 space per staff member.

AB 139, which went into effect on January 1, 2020, mandates that emergency shelters may only be subject to those standards which apply to residential and commercial development within the same zone, except that a city can apply standards regulating the number of beds, parking for staff provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, length of stay, and other minor standards.

AB 2339 was passed in 2022 to go into effect January 1, 2023. AB 2339 requires that jurisdictions identify zoning designations where emergency shelters are allowed to include sites that meet at least one of the following:

- Vacant and zoned for residential use
- Vacant and zoned for nonresidential use and located near amenities and services for homeless individuals
- Nonvacant and is suitable for use as a shelter in the current planning period

Additionally, AB 2339 requires jurisdictions to identify adequate sites that can accommodate at least 10 individuals with a minimum of 200 square feet per person on at least a 2,000 square foot vacant parcel. The parcel must also allow residential uses, such as mixed-use zones that permit residential. There are several identified vacant sites in mixed-use zone that can accommodate emergency shelters. As shown in Table 4-7, Mixed Use zones have potential capacity for more than 1,271 individuals in emergency shelters, significantly more than the required 112 individuals. As a result, the City complies with AB 2339 and does not constrain the development of emergency shelters.

Table 4-7 Emergency Shelter Capacity Analysis

APN	Acreage	Realistic Capacity (beds)
8735-004-008	3.32	723
8735-004-012	0.16	34
8735-004-013	0.29	63
8735-004-014	1.52	331
8735-004-015	0.55	120
Total	5.84	1,271

Low Barrier Navigation Centers

AB 101 (2019) establishes requirements related to local regulation of *low barrier navigation centers*, which are defined as “Housing First, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits,

health services, shelter, and housing.” *Low Barrier* means best practices to reduce barriers to entry, and may include, but is not limited to:

- The presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth.
- Accommodation of residents’ pets.
- The storage of possessions.
- Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.

Low barrier navigation centers are allowed by-right in areas zoned for mixed-use and in nonresidential zones permitting multi-family residential uses.

Transitional and Supportive Housing

Transitional housing provides longer-term shelter, typically up to two years, while supportive housing may have no occupancy time limit. Entities that operate transitional and supportive housing generally require that residents participate in a structured program to work toward established goals so that they can move on to permanent housing and may include supportive services such as counseling.

State law also requires that transitional and supportive housing be regulated as a residential use that is subject only to the same requirements and procedures as other residential uses of the same type in the same zone. AB 2162 (Government Code §65583(c)(3)) further requires that supportive housing development projects meeting specific criteria must be allowed by-right in all zones allowing multi-family development, including mixed-use and nonresidential zones. As shown in Table 4-8, the City currently allows transitional and supportive housing in all residential zones. The city complies with AB 2126 to allow supportive housing “by right,” and if the supportive housing development is located within one-half mile of a major transit stop, no parking spaces are required, per Government Code Section 65654. As a result, there are no constraints to the development of supportive and transitional housing.

Micro-Units/Efficiency Units

Micro-units, or efficiency units are typically between 200 and 350 square feet and include full bathroom and kitchen facilities inside the units. Micro-units provide an affordable housing option for individuals or couples, as they can be built more cheaply than typical unit sizes due to economies of scale. As shown in Table 4-8, the City’s zoning permits micro-units in all multi-family zones and mixed-use zones. As a result, there is no constraint to development of micro-units.

Group Homes/Special Group Homes

West Covina defines “group homes” as any residential care facility for six (6) or fewer persons who are mentally disordered or otherwise handicapped or supervised. The City defines “special group residence” as including, but not limited to, fraternity and sorority houses, college dormitories, residential care facilities (for seven or more persons), convalescent hospitals, housing for persons with disabilities, halfway houses, communal housing, and military barracks. Special group residence does not include group homes.

The City permits group homes and special group residences by-right in RA, R-1, MF-8, MF-15, MF-20, and MF-45 zones. The City does not impose additional zoning or development code requirements or additional permitting procedures on small care facilities beyond what applies to the underlying use requirement. As group homes and special group residential facilities are not subject to more restrictive development standards, there would not be a constraint to the development of such facilities.

Other larger residential care facilities are defined in the City’s Zoning Ordinance as skilled nursing facilities, assisted living facilities, and similar facilities and are allowed and subject to approval of a conditional use permit in all zones. This is typical of larger residential care facilities due to the unique parking requirements and functionality of a large facility.

Agricultural Employee Housing

The Employee Housing Act (Health and Safety Code §17021.5 and §17021.6) requires agricultural employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone and requires employee housing consisting of no more than 12 units or 36 beds in group quarters to be permitted in the same manner as other agricultural uses in the same zone.

The West Covina Zoning Code defines farmworker (agricultural) housing as a residential use of one or more single or multi-family dwelling units and accessory dwellings of the same type and in the same zone, and/or group quarters structures with common dining area. Housing for employees, including farmworker (agriculture) housing, is permitted by-right in all zoning districts that permit residential, and are subject to permitting in the same manner as other dwellings of the same zone. As a result, there are no constraints to the development of employee/farmworker housing.

Table 4-8 Zoning Use Matrix for Residential and Commercial Districts

Housing Type	R-A	R-1	MF-8	MF-15	MF-20	MF-45	O-PMU	N-CMU	R-CMU	S-CMU
Accessory Dwelling Unit	X	x	x	x	x	x	x	x	x	X
Duplexes										
Mobile Home Park			X	X	X	X	X	X	X	X
Micro-units, Efficiency Units			x	x	x	x	x	x	x	x
Multi-Family Residences			x	x	x	x	x	x	x	x
Single-Family Residence	x	x	x							
Short-Term Rentals										
Supportive Housing	x	x	x	x	x	x	x	x	x	x
Transitional Housing	x	x	x	x	x	x	x	x	x	x
Rooming House	CUP	CUP	CUP	CUP	CUP	CUP				
Senior Citizen Housing	CUP	CUP	CUP	CUP	CUP	CUP				
Emergency shelters (up to 30 occupants)							x	x	x	x
Group Home (1-6 persons)	x	x	x	x	x	x				
Special Group Residences	x	x	x	x	x	x				
Skilled nursing facilities/assisted living facilities	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP

x- Allowed by right

CUP – Conditional Use Permit

Blank - Use Not Permitted

Source: City of West Covina Zoning Code, 2023.

4.2.4 Building Codes and Enforcement

The City adopted the 2019 California Building Code (CBC) with Los Angeles County Amendments and further amended Chapter 9, Fire Sprinkler Requirements to be in coordination with Fire Code Amendments. Like many other jurisdictions, property and building maintenance standards are included in the Municipal Code to protect the appearance and character of residential neighborhoods. The established standards require property owners to maintain landscaped areas for aesthetic, health, and fire safety reasons. Building maintenance regulations address abandoned buildings, deteriorating paint, deteriorating roofs, or broken windows. Analysis of the City's landscape maintenance standards for buildings and residential properties reveals that the standards imposed are minimal routine maintenance requirements and do not pose a significant impediment or act as a constraint to existing residential housing units or to the development and maintenance of affordable housing. These codes are typical of other cities and do not act as a constraint on the cost and supply of housing.

4.2.5 On-Site and Off-Site Improvements

Site improvements and property dedications are important components of new development and are necessary to provide vital infrastructure and decent living situations. Depending on size and location of residential development, the required site improvements may include, but are not limited to, connections to sewer and wastewater infrastructure, distribution lines to domestic water supply, street improvements, traffic signals, curbs and sidewalks.

The City maintains a high engineering standard for curbs, gutters, sidewalks, and streets, and these standards regulate construction and such items as width and grade. On and off-site improvements, particularly infrastructure improvements, are standard and typical of surrounding cities. In the past, the City has approved residential subdivisions with private streets where the standards have been modified to reduce housing costs.

To reduce the impact of infrastructure requirements on the development of affordable units, sites identified in the Sites Inventory to accommodate very low- and low-income housing are located along major roadways with existing infrastructure so projects would not require further upgrades. If improvements are necessary, the City shall use CDBG or other available funding sources, when available, to offset the cost of on- and off-site improvements and enhance the feasibility of affordable housing development. Additionally, through the density bonus ordinance, the City will continue to provide incentives and assistance with on- and off-site improvements whenever feasible.

4.2.6 Fees and Exactions

Planning and permitting fees are charged on an at-cost basis to cover staff services and administrative expenses for processing development applications. Development impact fees are required to provide essential public services and infrastructure to serve new

residents. In addition, developer fees and exactions imposed on new development can help to minimize impacts on existing infrastructure and enable required upgrades of infrastructure consistent with demands of the new development. State law requires that these fees be reasonably related to the mitigation of the identified impact, and that they be proportionate to the extent of impact associated with any given development project. These development fees are typically passed on to renters and homeowners in the price/rent of housing, and thus affect housing affordability.

The City’s Planning and Development Fee Schedules are outlined in Table 4-9. In 2023 the City performed an analysis and updated the fee schedule for Planning application fees. The development fees for the City of West Covina are comparable to other local jurisdictions and are not considered to be a major constraint to the development of affordable or market rate housing.

Table 4-9 City of West Covina Fee Schedule

Fee Type	Fee Amount
Planning Commission – Public Hearing Items	
Conditional Use Permit (CUP) Development Agreement(DA) General Plan Amendment (GPA) Precise Plan of Design (PP) Tentative Parcel or Tract Map (TPM-TTM) Variance (VAR) Zone Change (ZC)	\$87 per hour of staff time against deposit as determined by Planning Director Actual cost of City Attorney \$5,555 for Commercial CUP and \$4,750 for Residential CUP; \$3,175 for DA; \$13,215 for GPA; \$21,430 for PP \$; \$6,315 for TPM and \$12,150 and TTM; \$12,315 for Variance; \$9,835 for ZC
Miscellaneous Permits/Requests	
Administrative Use Permit Includes: Alcohol/ABC License Large Family Daycares Single Family Dwelling Large Expansion Maximum Unit Size Exception Retaining Walls/Elevated Structures Second Story Addition Small Wireless Telecommunication Facility	\$87 per hour of staff time \$640 for Residential - No Construction \$1,290 for Residential – Construction \$1,375 for Commercial \$3,065 additional fee if public hearing is required/ requested by Planning Director
Administrative Review	\$565
Adult Oriented Businesses	\$87 per hour of staff time Actual cost of Attorney fees and consultant fees
Amendment to Conditions of Approval	\$87 per hour of staff time Actual cost of Attorney fees and consultant fees
Annexation/Deannexation Processing	\$87 per hour of staff time Actual cost of Attorney fees and consultant fees
Appeal to Planning Commission (Hearing Items)	\$87 per hour of staff time \$3,065 filing fee Actual cost of Attorney fees
Appeal to Planning Commission (Non-Hearing Items)	\$87 per hour of staff time \$2,565 filing fee Actual cost of Attorney fees
Appeal of Revocation Hearing	\$4,205 filing fee Actual cost of Attorney
Art in Public Places	\$1,260
Code Amendment	\$7,720 Actual cost of Attorney fees

Fee Type	Fee Amount
Code, Covenants & Restrictions Review	\$130 Actual cost of City Attorney
Covenant Preparation Fee	\$210
Design Review	\$580 for addition of floor area \$85 for non-floor area revisions
Film Permit	\$87 per hour of staff time \$950 application fee \$3,065 additional fee if hearing is required by Planning Director
Historic Property Certificate of Appropriateness	\$87 per hour of staff time Actual cost Attorney fees and consultant fees
Commercial/Residential Landscape/ Irrigation Plan Check & Inspection	\$87 per hour of staff time Actual cost Attorney fees and consultant fees
Massage Technician Review	\$87 per hour of staff time Actual cost Attorney fees and consultant fees
Model Home Marketing Complex	\$1,805
Precise Plan of Design - Administrative Review	\$87 per hour of staff time \$11,245 for 10 units or less \$14,010 for 11-20 units *15,855 for more than 20 units Actual cost of Attorney fees and/or City Architect
Preliminary Review Meeting	\$3,305
Prospective Homeowners Awareness Package Review	\$790
Public Right-of-Way Banner	\$280
Reasonable Accommodation Processing	\$960
Second Unit Review	\$960 for new construction \$615 existing structure
Sign Permit Clearance	\$65 per sign
Sign Review - Administrative	\$555 per sign
Sign Criteria Review	\$1,375
Site Plan Review - Minor	\$1545
Site Plan Review - Fence/Wall/Color	\$515
Slight Modification	\$1,660 Actual cost of Attorney fees
Minor Modification	\$460
Special Event Review	\$495 \$135 for banners
Special Exemption Review (Downtown Plan)	\$610
Time Extension	\$1,050 for public hearing items \$780 for misc. permit types
Tree Removal	\$255 \$20 per additional tree
Zoning Verification Letter	\$475

Source: City of West Covina Master Fee Schedule, 2023.

The City also charges a limited number of impact fees to ensure that services and infrastructure are in place to serve the planned developments (see Table 4-10). West Covina’s impact fees include a dwelling unit fee, park fees, and school fees. Los Angeles County provides sewer service to the City, and charges a related sewer connection fee. The dwelling unit fees are applied to pay a portion of the costs identified for public facilities used for transportation services, storm drain facilities, and police and fire services. Although impact fees and requirements for offsite improvements add to the cost of housing, these fees and requirements are necessary to maintain public health and safety within a community.

In an effort to promote accessory dwelling units, affordable housing, and senior housing, the City provides parkland fee exemptions or reductions for these uses. New ADUs on a property with one existing single-family house pay only half of the required in-lieu parkland fees. Residential development restricted to low- and moderate-income households and/or senior citizens are exempt from parkland fees.

Development impact fees are required to provide essential services and infrastructure to serve new residents. Impact fees are required by State law to be based on a demonstrated nexus between development and potential impacts. State law also requires the proportionality test to ensure the pro-rata share of costs to provide services and infrastructure by individual developments is reasonable. Local governments have little control over this issue due to the statewide property tax limitations imposed by the voters in 1978 through Proposition 13. As a result, new development typically bears a larger share of the cost of public services and facilities than existing property owners. Based on the voters’ rejection of Proposition 15 in 2020 it appears that property tax limitations will continue to act as constraint to the financing of public facilities in the foreseeable future.

Table 4-10 Development Impact Fee Summary

Impact Fee Category	Fee Amount
Traffic Congestion Relief Fees	A mitigation fee might be charged if project is creating traffic impacts.
Park & Recreation Land Dedication	The Park/Recreation Impact Fee or In-Lieu fee is based on the amount of land to be dedicated that provides 3.2 acres of park area for 1,000 residents. Park area is based on the number of dwelling units to be constructed and the density factor of 3.35 persons per dwelling unit and 2.35 for senior or affordable housing complexes.
Sewer Connection Fee	\$400 per connection
Plumbing Fee	\$8.80 per fixture + \$22.10 for permit issuance
Electrical Fee	1.5x County fee
Construction Tax	\$505 per 1,000 square feet
Art in Public Places Program*	One-Half Percent (0.5%) of the Total Building Valuation
School Fees	
Covina-Valley Unified	\$2.24 per square foot
Baldwin Park Unified	\$1.93 per square foot
Rowland Unified	\$2.05 per square foot
Walnut Valley Unified	\$1.84 per square foot
West Covina Unified	\$2.05 per square foot

Impact Fee Category	Fee Amount
Building Department Fees	1.5x County fee
\$1-10,000 value	\$57.00-\$216.00
\$10,001-40,000 value	\$233.00-\$420.00
\$40,001-70,000 value	\$423.00-\$550.00
\$70,001-100,000 value	\$555.00-\$682.00
\$100,001-500,000 value	\$682 for the first \$100,000.00 valuation, plus \$4.50 for each additional \$1,000.00 or fraction thereof, to \$500,000

Source: City of West Covina, 2021

*Art in Public Places Fee only applies to residential development projects with more than 10 dwelling units and is based on 0.5% of the total building valuation excluding land.

The City’s development impact fees for residential developments vary by project scope. Table 4-11 estimates total development fees for a typical project. The fees are approximately \$24,441 for a typical single-family unit and \$15,011 for a typical multi-family unit, which represents approximately seven percent of total development cost for a typical single-family unit and six percent for a typical multi-family unit, which is minimal compared to overall development costs. These fees were established based upon applicable State laws, are comparable to those of surrounding communities in Los Angeles County and are not considered to be an unreasonable constraint to the development of housing.

Table 4-11 Development Fee Summary

Fee	Single-Family Detached (with subdivision) based on 2,500 sq. ft. house	Single-Family Detached (w/out subdivision) based on 4,000 sq. ft. house	Single-Family Attached based on 2,500 sq. ft. per unit duplex	Multi-Family based on a 1,200 sq. ft. per unit
Permit Fees (includes plan check)	\$15,620	\$19,900	\$15,845	\$8,040
Impact Fees	\$1,821	\$4,023	\$1,298	\$2,871
Total Fees	\$24,441	\$23,923	\$23,741	\$15,011

Source: City of West Covina, 2022

Based upon typical developments

4.2.7 Permit Processing and Procedures

Builders and developers frequently cite the cost of holding land during the evaluation and review process as a significant factor in the cost of housing. Processing times vary with the complexity of the project or the need for additional entitlements. Approval for single-family homes, multi-family development projects with less than five units, and other minor tenant improvements can usually be processed within 30 days of submission to the City. Multi-family development projects with five or more dwelling units are subject to review and approval by the Planning Commission, which can add another four to six weeks for review. Projects requiring a Conditional Use Permit, Zoning Amendment, or other discretionary action require more extensive review, resulting in a longer processing timeline; usually 60 to 90 days unless an EIR is required by CEQA. The City has adopted CEQA Guidelines that identifies the Community Development Director as the person responsible for the CEQA review determination. In practice, all projects are reviewed and provided with either comments/incomplete letter, or approval within 30 days. The incomplete letter indicates

the CEQA review process (technical analysis needed and need to hire a CEQA consultant). The City's process is more streamlined than the timeframes provided by State Law. If a project is exempt, the City automatically approves it with conditions. The City is committed to maintaining clarity and consistency in review processes and procedures to not discourage developers or lengthen processing timelines. The City's housing development approval process is led by the Planning Division which leads agency in coordinating with other departments or agencies and facilitating development. The time required to process a permit application can have implications on the cost of affordable housing, as housing projects are often accompanied by zoning changes or additional entitlements. Table 4-12 provides a summary of typical processing times for various application and planning review items. The Planning Division is the lead agency responsible for processing residential development applications and coordinating submittals with other City departments and agencies. The time required to process a development entitlement application can have cost implications for affordable housing. Changes in zoning designations or standards are typical of entitlement requests accompanying proposals for affordable housing.

The City is committed to monitoring processes and timelines for housing development and setting clear and standard processes in the development code update. The City aims to further reduce constraints for developers of affordable housing projects by prioritizing project review for low-income housing units through Program 3.1.

Table 4-12 Local Development Processing Time Limits

Item	Approximate Length of Time from Submittal to Public Hearing
Conditional Use Permit	2 -3 months
Site Plan Review	30 days
Tentative Tract Map/Parcel Map/Subdivision	3-4 months
Variance	2 -3 months
Zoning Amendments or Zone Change	3-5 months
General Plan Amendment	3-5 months
Environmental Impact Report	90+ days
Initial Study	60-90 days
Mitigated Negative Declaration	60-90 days

Source: City of West Covina Planning Division

Permit Processing for Single-Story Single-Family Construction

The permitting approval process for a residential project depends on the intensity and number of units requested by the applicant. Permits to construct a single-story single-family home are submitted to the Planning Division for initial review to ensure the application is complete. The more information an applicant provides, and the quicker they correct any revisions on their plans, the shorter the permit processing time. Upon completion of the initial review the Planning Division schedules the application for review by the Planning Commission Subcommittee for Design Review (Subcommittee). The Subcommittee typically reviews the plans for architectural and design compatibility with the surrounding neighborhood and the character of the City. The Subcommittee has the authority to approve or deny the plans or to suggest modifications. Once the plans have been approved by the Subcommittee, the City notifies the applicant and permits can be issued. This review process typically takes between 2 to 4 weeks. The processing time is often

dependent on how quickly the applicant revises and resubmits plans if corrections are required.

Permit Processing for Multi-Story Single-Family Construction

Permits applications for multi-story single-family homes are reviewed and approved through the Administrative Use Permit process. Once the applicant submits their application and plans, an appointment is scheduled with the Planning Commission Subcommittee for Design Review (Subcommittee), which is composed of City Staff and two appointed Planning Commissioners. The Subcommittee evaluates the plans for completeness, as well as assessing comments made by the various other City departments including, fire, public works and building. The Subcommittee also typically reviews the plans for architectural and design compatibility with the surrounding neighborhood and consistency with the character of the city.

In addition to review by the Subcommittee, an Administrative Use Permit also requires that notices be sent to property owners living within 300 feet of the proposed project. The notice is intended to inform residents of the applicant's plans and to allow them to request a public hearing before the Planning Commission to discuss the application and any express concerns. Notices are sent out prior to Subcommittee review. If no public hearing is requested, the Subcommittee is responsible for project approval and the review process can take as little as 2-4 weeks. If a public hearing by the Planning Commission is requested, the process can extend up to 8 weeks and the Planning Commission becomes the decision-making entity.

Permit Processing for Multi-Family Construction

For a multi-family residential project, the permitting procedure can be more complex can result in longer and more variable processing times. The City currently has different submittal requirements for multi-family developments; one for projects with rental units and another for projects with ownership units. For multi-family rental units a Precise Plan is required while for ownership units a Precise Plan as well as a Tentative Tract Map is required. Generally, the application process is similar for both types of units.

Once the applicant submits the application and plans, an initial meeting is scheduled with the developer to discuss design and phasing of the project. Following this meeting, an appointment with the Development Review Committee is scheduled and the plans are routed to the various City departments including Fire, Public Works and Building for review. The Development Review Committee evaluates the plans for completeness as well as assessing comments made by the various City departments. The Committee also typically reviews the plans for architectural and design compatibility with the surrounding neighborhood and consistency with the character of the city. The Committee may also determine if any conditions of approval, such as capital improvements, are necessary to complete the project. Conditions of approval typically protect the health, safety and welfare of the public and ensure a project's consistency with established architectural design guidelines.

Upon completing its review, the Committee's conditions of approval are sent to the applicant. At the applicant's request a meeting can be scheduled to discuss the conditions of approval. If the applicant accepts the findings and conditions, the project is scheduled for a public hearing before the Planning Commission. Findings and conditions do not exceed the limits and requirements of State law. Any finding or conditions are provided primarily to ensure that the project is consistent with the City's General Plan, the Zoning Code and Health and Safety codes, Typical findings for a multi-family housing project include compliance with required street improvements, fire suppression, and water quality standards. In most cases, a project would then be approved by the Planning Commission and permits would be issued soon after. The processing time for a multi-family development typically takes between 10 and 12 weeks. Similar to the process for single-family projects, the processing time is often dependent on how quickly the applicant revises and resubmits plans if corrections are required.

State law requires the Housing Element to describe whether housing developers request densities less than what is allowed under zoning regulations, and also the typical length of time between project approval and submittal of a building permit application. Based on recent project examples, proposed densities vary from the lower end of the allowable density range to near the maximum. Desired densities are based on the developer's analysis of market conditions to maximize profit margins.

The time from project approval to submittal of building permit applications varies depending on the complexity of the project. Recent project examples have ranged from approximately four months to nine months depending on project size and complexity.

4.2.8 Housing for Persons with Disabilities

State law requires jurisdictions to analyze potential constraints on housing for persons with disabilities, demonstrate efforts to remove governmental constraints, and include programs to accommodate housing designed for people with disabilities. The City has no special zoning or land use restrictions that regulate the development of housing for persons with disabilities.

Reasonable Accommodation for Persons with Disabilities

Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to allow reasonable accommodation (i.e., modifications or exceptions) in their zoning laws and other land use regulations when necessary to afford persons with disabled an equal opportunity to use and enjoy a dwelling. The building codes adopted by the City incorporate accessibility standards contained in Title 24 of the California Administrative Code.

City procedures for ensuring that reasonable accommodation is available for persons with disabilities are established in Municipal Code §26-200 through §26-209. Applications for reasonable accommodation are reviewed administratively by the Community Development Director unless the application is part of a larger project subject to a higher

level of review, in which case the decision on the reasonable accommodation is made as part of the larger package of applications.

The following factors are considered in determining the reasonableness of any request for reasonable accommodation:

- The need for the requested modification, including alternatives that may provide an equivalent level of benefit.
- The physical attributes of and any proposed changes to the subject property and structures.
- Whether the requested modification would impose an undue financial or administrative burden on the city.
- Whether the requested modification would constitute a fundamental alteration of the city's General Plan, applicable specific plan, zoning or subdivision program.
- Whether the requested modification would result in a concentration of uses otherwise not allowed in a residential neighborhood to the substantial detriment of the residential character of that neighborhood.
- Whether the requested modification is being provided primarily to benefit one or more persons with a disability.
- Whether the requested modification is necessary for therapeutic benefit to the person(s) with a disability.
- Whether the requested modification would result in a substantial increase in traffic or insufficient parking.
- Whether the requested modification would significantly deprive any neighboring property owners of the use and enjoyment of their own properties.
- Whether there are preferable and/or feasible alternatives to the requested accommodation that may provide an equivalent level of benefit.
- Whether proposed changes to property or structures are compatible with surrounding development or create potential impact(s) on surrounding uses.
- Whether the findings of section 26-298.12(b) exist.
- Any other factor that may have a bearing on the request.

Based upon these factors, the reasonable accommodation request may be approved based upon the following findings:

- That the dwelling, which is the subject of the request for reasonable accommodation, will be used by an individual with a disability protected under the Acts.
- That the requested modification is necessary to make the dwelling available to an individual with a disability protected under the Acts.
- That the requested modification would not impose an undue financial burden on the city.
- That the requested accommodation would not require a fundamental alteration in the nature of the city's overall land use and zoning.

- That the accommodation will not result in a direct threat to the health and safety of other persons or physical damage to the property of others.

Findings that refer to “potential impact on surrounding uses,” are subjective and can be a constraint to providing reasonable accommodations. The City will review the City’s reasonable accommodation policy and grievance procedure, update as needed, as described in Program 4.2.

Definition of Family

Local governments define “family” in terms of housing and households in order to regulate the size and situation of groups of people living within a city. As persons with disabilities might utilize a communal living situation, or group home, to better access resources and maintain independence. A restrictive definition of “family” could constrain housing options for persons with disabilities. The City’s Municipal Code defines family as “one or more persons, related or unrelated, living together as a single household in a dwelling unit.” This is not considered a constraint.

4.3 Non-Governmental Constraints

In addition to the governmental constraints addressed above, non-governmental issues such as real estate market conditions, environmental issues, and infrastructure constraints can also affect housing cost and supply.

4.3.1 Market Constraints

Market constraints can play a large role in driving up the cost of housing production leading to an overall lower number of affordable units. Potential constraints include land prices, construction costs, and the cost and availability of financing.

Land Prices

The cost of land directly influences the cost of housing. Land prices are determined by several factors, most importantly is land availability and permitted development density. As land becomes scarcer, the price of land increases. Land prices are also positively correlated with the number of units permitted on each lot. A higher density lot may command a higher price than one designated for lower densities, but upon completion the developer may realize a higher profit margin based on a greater number of units sold.

West Covina is typical of the suburban communities surrounding the City of Los Angeles in that it is largely built out. The cost of land varies depending on many factors but can exceed \$2 million per acre and can be a constraint to the development of housing, especially affordable housing. There is little that municipalities can do to mitigate the high cost of land.

Construction Costs

The cost of construction depends primarily on the cost of materials and labor, but it is also influenced by market demand and market-based changes in the cost of materials. The cost of construction also depends on the type of unit being built and the quality of the product being produced. Typically, as the number of units constructed increases, overall costs generally decrease as builders can benefit from economies of scale. There is wide variation in price for both single-family and multi-family construction, depending on the size of the unit, the number and quality of amenities provided, quality of construction, and the types and quality of materials used.

In recent years total construction costs per square foot, excluding land costs, can range from \$150 to \$200 per square foot or more depending on the quality and amenities of the home. A reduction in construction costs can be brought about in several ways. One such method involves a reduction in amenities and quality of building materials in new homes (still above the minimum acceptability for health, safety and adequate performance), which may result in lower costs. State law provides that local building departments can authorize the use of materials and construction methods if the proposed design is found to be satisfactory and the materials or methods are at least equivalent to that prescribed by the applicable State building codes.

In addition, pre-fabricated factory built housing may provide cost savings by reducing labor and materials costs. As the number of units built in scale increases, savings in construction costs over the entire development can be realized, particularly when combined with density bonus provisions. The City may implement a variety of programs to write down land costs or provide other developer incentives such as modifications in development standards or processing fees in order to increase affordability, subject to the developer providing a percentage of units with affordability restrictions.

Availability of Financing

Affordable housing developments are typically financed with a range of often layered grants and low-cost financing from federal, state, and local sources. The following programs were available to affordable projects in the City of West Covina in 2021:

- The HOME Investment Partnerships Program (HOME) is a HUD program that assists cities, counties, and non-profit community housing development organizations (CHDOs) to create and retain affordable housing for lower-income renters or owners. HOME funds are available as loans for housing rehabilitation, new construction, and acquisition and rehabilitation of single- and multi-family projects and as grants for tenant-based rental assistance.
- The Low-Income Housing Tax Credit (LIHTC) program awards tax credits to developers of affordable housing projects, which are sold to investors to fund the project development. The California Tax Credit Allocation Committee (TCAC) develops scoring methodology and makes awards through a competitive process.

- Housing and Community Development (HCD)'s Multi-Family Housing Program (MHP) makes low-interest, long-term deferred-payment permanent loans for new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower-income households.
- HCD's Predevelopment Loan Program (PDLP) makes short-term loans for activities and expenses necessary for the continued preservation, construction, rehabilitation, or conversion of assisted housing primarily for low-income households.
- Project Homekey is an HCD program designed to allow state, regional, tribal, and local public entities to develop a broad range of housing types for people at risk of or currently experiencing homelessness, including but not limited to hotels, motels, hostels, single-family homes and multi-family apartments, adult residential facilities, and manufactured housing, and to convert commercial properties and other existing buildings to permanent or interim housing for individuals at risk of or currently experiencing homelessness.
- HCD's Infill Infrastructure Grant (IIG) program promotes infill development by providing financial assistance for Capital Improvement Projects that enable development of infill projects or in infill areas, as defined by the program guidelines.
- No Place Like Home Program (NPLH) funds the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or at risk of chronic homelessness. The program is administered by HCD.
- The Transit-Oriented Development (TOD) Housing Program administered by HCD provides low-interest loans as gap financing for rental housing developments near transit that include affordable units. In addition, grants are available to local governments and transit agencies for infrastructure improvements necessary for the development of specified housing developments, or to facilitate connections between these developments and the transit station.
- The Affordable Housing and Sustainable Communities (AHSC) program is administered by the Strategic Growth Council and implemented by HCD and provides funding to housing development that connects residents with jobs, amenities, and low-carbon transportation.

While these funding sources can help finance affordable housing development, receipt of funds add additional costs to comply with additional requirements. Many funding sources (e.g., tax credits, bonds, federal funds) trigger other regulations. For example, the Davis-Bacon Wage Act, requires the use of prevailing wage, and projects must have increased accessibility and sustainability measures. These requirements raise development costs significantly, resulting in a greater need for project subsidies.

In addition, programs available to finance affordable housing projects are extremely competitive and not all eligible projects receive funding. Some funding sources require local matching funds, which puts a greater strain on limited local funding. A lack of funding statewide and locally is a constraint to developing affordable housing sufficient to meet the needs of the community. Mortgage interest rates have a large influence over the affordability of housing. Increases in interest rates also increase the monthly mortgage

payment and decrease the number of persons able to afford a home purchase. Decreases in interest rates result in more potential homebuyers introduced into the market.

Financing for Homeowners

National policies and economic conditions determine interest rates, and there is little that local governments can do to affect these rates. Government – typically at the state and federal level – can, however, “leverage” funds by offering interest rate write-downs to extend home purchase opportunities to lower-income households. In addition, government insured loan programs may be available to reduce mortgage down payment requirements.

The ability to secure financing can be influenced by several factors, including creditworthiness, debt-to-income ratio, and the restrictiveness of mortgage lending standards. Data compiled under the Home Mortgage Disclosure Act (HMDA) provides an indication how lending practices affect a community’s home sales. While the availability of mortgage financing in West Covina is similar to other areas of the Los Angeles metropolitan area, the most recent Los Angeles County Analysis of Impediments² reported that fair housing public input and HMDA data indicate that racial and ethnic minorities, as well as other protected classes, face discrimination in private rental and homeowner markets. HMDA data shows that some racial and ethnic minorities are more likely to be denied a mortgage. In addition, HUD Fair Housing Complaint Data for the Los Angeles Urban County area, which includes West Covina, showed over 2,600 complaints between 2008 and 2016. The basis of these complaints was most likely to be disability, race, or familial status. In addition, the Fair Housing survey found that 9.3 percent of respondents indicated that their home loan application was denied in the past five years. According to HMDA data, between 2008 and 2015, black mortgage applicants are denied at a rate more than seven percentage points higher than white applicants, and Hispanic applicants are denied at a rate more than five percentage points higher than non-Hispanic applicants.

While the primary responsibility for addressing such discrimination lies with federal and state regulatory agencies, cities can assist local residents who feel they have been affected by discrimination by publicizing fair housing referral information (see Program 4.1).

4.4 Environmental Constraints

4.4.1 Seismic Ground Shaking

The potential for seismic activity and ground shaking is determined by the city’s proximity to the affected fault and the intensity of the seismic event along the fault. Damage associated with earthquakes is dependent on a number of variable factors including: the strength or magnitude of the earthquake, the length (time) of the shaking, the distance from the

² 2018 Analysis of Impediments of Fair Housing Choice for the Community Development Commission and Housing Authority of Los Angeles County

earthquake, the substrate that is being affected by the quake, and the construction of the structure.

There are traces of two known faults within the borders of the city, the Walnut Creek fault and the San Jose Hills fault. These two faults are not well defined or studied. The Walnut Creek tracing is located under basin sediment that has for years been deposited from the San Gabriel and surrounding mountains. The City has implemented the Uniform Building Code seismic safety standards for structural construction. The City will continue to enact these and other seismic safety programs to minimize hazards from earthquakes and other seismic hazards. As a result, seismic ground shaking is not considered a constraint to development.

4.4.2 Liquefaction

A secondary effect from earthquakes includes liquefaction. Liquefaction occurs when ground shaking causes wet granular soils to change from a solid state to a liquid state. This results in the loss of soil strength and the soil's ability to support weight. Buildings and their occupants are at risk when the ground can no longer support these buildings and structures. Many communities in Southern California are built on ancient river bottoms and have sandy soil. In some cases, this ground may be subject to liquefaction, depending on the depth of the water table. Data provided by water service providers around the city indicate that a depth to groundwater is more than 50 feet, and therefore liquefaction hazards are generally low. Liquefaction hazards, where present, can generally be remedied by standard engineering practices. Liquefaction is not seen as a constraint to the development of affordable or market rate housing.

4.4.3 Infrastructure Constraints

In planning for future residential development, it is important to evaluate current service levels provided to existing residents, deficiencies in the levels of services provided, and the need for additional public services and facilities to support new development. This section addresses the ability of water and wastewater utilities to serve an increase in population. Generally, infrastructure development is not seen as a constraint to the development of affordable or market rate housing.

Water

Potable water is provided by eight water companies depending on the location of the residence in the city. Suburban Water Systems (SWS) provides water to the majority of the City serving a population of approximately 300,000 persons. SWS receives wholesale water supplies from the Upper San Gabriel Valley Municipal Water District (USGVMWD). The USGVMWD is in turn a member of the Metropolitan Water District of Southern California, which provides the USGVMWD with approximately 20 percent of its water supply. The remaining water supply is supplied locally through groundwater supplies. Based on verbal communication with SWS it is anticipated that there is adequate water supply to accommodate the City's RHNA allocation. Project-specific analysis may be required when a project is proposed to determine if the existing infrastructure and proposed demand need

to be addressed. Generally, water supply is not seen as a constraint to the development of housing .in West Covina.

Wastewater

West Covina is located within the service area of Los Angeles County Sanitation District No. 15. Wastewater generated within the city is discharged to local sewer lines, maintained by the City, for conveyance to the County Sanitation District of Los Angeles County truck sewer network. Wastewater is treated at the San Jose Creek Water Reclamation Plant (SJCWRP) near the City of Whittier, where it is cleaned and reused as groundwater recharge and for the irrigation of parks, schools, and greenbelts. Some of the wastewater not used, or flows which exceed capacity of the SJCWRP, is diverted to the Joint Water Pollution Control Plan in Carson. The sewer line system is considered adequate to handle foreseeable future development accommodating the City's RHNA allocation.

Dry Utilities

Residential utilities such as electricity, telephone, cable, and internet service are provided by private entities as development occurs and are available in all residential areas of the city.

Section 5

Housing Resources

This section documents the City of West Covina’s ability to satisfy its share of the region’s future housing needs and summarizes the physical, financial, and administrative resources available for the development and preservation of housing in the city. The analysis examines how the City can meet its future housing needs by assessing the land and infrastructure resources available for future development, the financial resources available to support housing projects, and the administrative resources to facilitate the implementation of the City’s housing programs and policies.

5.1 Availability of Sites for Housing

State law requires that a community identify sufficient sites to accommodate the amount of new housing assigned through the Regional Housing Needs Assessment (RHNA) process based on projected growth. The 6th cycle Housing Element update includes an assessment of the City’s land inventory available to meet housing needs. Adequate sites are those with appropriate zoning and development standards with services and facilities needed to facilitate and encourage the development of a variety of housing for all income levels.

The inventory and analysis of sites for potential housing development is presented in Appendix B.

5.2 Financial and Administrative Resources

5.2.1 Financial Resources

A variety of federal, state, and local programs are available to create and maintain affordable rental units and purchase affordability for lower-income households and for persons with special housing needs. These programs are also available to other jurisdictions for potential acquisition, subsidy, or replacement of units at-risk of becoming market rate. After the State’s elimination of redevelopment agencies, the primary sources of funding for local housing programs are from federal and state grants.

5.2.2 Administrative Resources

The primary responsibility of the City’s Planning Division is managing the physical environment of the city to promote quality of life by planning and implementing standards and regulations for physical improvements. The Planning Division coordinates with other Departments to ensure the city’s livability and economic vitality through enforcement of

land use, construction, health, safety, and environmental regulations. It is also responsible for the administration of the General Plan and Zoning Code. Development must adhere to land use and development standards, Building, Engineering and Fire department codes, and to the General Plan's comprehensive goals and policies.

5.3 Energy Conservation Opportunities

As residential energy costs rise, the subsequent increasing utility costs reduce the affordability of housing. The State of California established the Building Energy Efficiency Standards for Residential and Nonresidential Buildings in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are codified in Title 24 of the California Code of Regulations and are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. California's building efficiency standards (along with those for energy efficient appliances) have saved billions of dollars in electricity and natural gas costs.¹

Title 24 sets forth mandatory energy standards and requires the adoption of an "energy budget" for all new residential buildings and additions to residential buildings. The standards specify energy saving design for lighting, walls, ceilings and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards and the use of non-depleting energy sources, such as solar energy. Residential builders must comply with these standards and local jurisdictions are responsible for enforcing the energy conservation regulations through the plan check and building inspection processes.

Energy conservation programs available locally include:

- **Free Energy Assessment Screening for Your Home (EASY)** - EASY provides a whole house energy assessment to help homeowners identify opportunities that reduce energy usage and energy costs. Participating homes will receive a customized home report with project recommendations, information about incentive and rebate programs through local utility companies such as Southern California Edison and SoCalGas, and suggestions for immediate home improvement projects. EASY is a program of the San Gabriel Valley Council of Governments, and home assessments are conducted by members trained in building science.
- **HERO Financing Program for Home Retrofits** - The Home Energy Retrofit Opportunity (HERO) Financing Program will assist in funding energy efficiency projects for Covina homeowners. Through the HERO program, homeowners will work alongside contractors to identify home energy projects and products that are eligible for low-interest financing. The low interest loans are paid back as an additional line item on the home's property tax. There are no up-front costs.

¹ California Energy Commission (<http://www.energy.ca.gov/title24>)

- **Savings by Design** - This program is designed for non-residential new construction, renovation, and remodel projects. Savings by Design provides energy-efficient design ideas to primary decision-makers such as building owners, developers, architects, engineers, designers, contractors, and builders. A Savings by Design analysis provides detailed technical and financial assistance data that allows owners and design teams to make informed decisions regarding energy efficiency features. This approach offers the non-residential building industry a multi-faceted program designed to consistently serve the needs of the building community throughout California. Savings by Design encourages energy-efficient building design and construction practices, promoting the efficient use of energy by offering up-front design assistance supported by financial incentives based on project performance.
- **PACE Financing Program for Commercial Properties** - Upgrading or retrofitting buildings to use less energy and water or produce clean energy can lower operating costs while increasing property value. In an effort to make these energy improvements more attainable for property owners, Renovate America offers the Property Assessed Clean Energy (PACE) financing program. Unlike a traditional loan, PACE financing is paid back via an assessment on the property tax bill. PACE financing allows owners of commercial properties to finance up to 100% of the cost of installing energy-efficient, renewable energy and water-saving improvements and immediately enjoy the benefits of lower utility bills. PACE offers low fixed rates and extended terms of 5 to 20 years to help keep payments affordable.
- **Electric Lawn Mower Rebate Program** - A rebate is available to residents that purchase a qualifying electric lawn mower. Residents that purchase a new, cordless electric lawn mower and scrap their old gas mower are eligible for a rebate based on the purchase price of the new mower. The on-line application is available at www.aqmd.gov/lawnmower. Rebates range from \$150 to \$250, depending on the purchase price of the new electric lawn mower. Over 20 electric lawn mower models qualify.

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Appendix A

Review of the Prior Housing Element

The Progress Report, as follows, reviews the programs, objectives, and actions that were to be implemented with the 5th Housing cycle Housing Element in order to inform the development of appropriate programs with the 6th cycle Housing Element. The City of West Covina's previous Housing Element identified five goals that the City anticipated to implement during that planning period. Each goal has specific policies that were to be achieved in order to facilitate the construction of affordable housing and to maintain the existing affordable housing stock. The City also established a set of objectives with corresponding goals to further improve housing opportunities throughout the city. Each of the objectives lists an expected timeframe for completion and the responsible agency designated to monitor the program.

For each program, the City's accomplishments and status of implementation is described, with quantitative results whenever possible, along with how the program should continue to be implemented, modified, or removed. Section 65588 of the State Housing law requires that all local governments initiate a timely review of the housing element to evaluate all of the following:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal;
- The effectiveness of the housing element in attainment of the community's housing goals and objectives; and
- The progress of the city, or county in the implementation of the housing element.

A.1 Cumulative Effectiveness in Meeting the Housing Needs of Persons with Special Needs

According to the Department of Social Services there are approximately 22 residential care facilities in West Covina to serve the needs of those with disabilities. In recent years the City has approved two large assisted living projects - 1400 W. Covina Parkway, a 5-story facility with 131 beds and 111 units and memory care (2017) and 1415 W. Garvey Avenue North, a 5-story facility with 107 beds and 92 units and memory care (2019).

The City of West Covina currently has six affordable multifamily housing complexes and four additional housing communities with housing specifically reserved for seniors. In total the city has 1,013 affordable units, 431 of which are targeted for seniors.

To evaluate the effectiveness of the City's housing programs in the development and maintenance of affordable housing, the City will monitor these affordable units regularly to ensure that the rents charged are consistent with levels appropriate for the identified income category the units were counted towards. The City has posted the AB 987 Affordable Housing database on its website and will continue to track affordable housing units citywide through the annual certification process. Furthermore, any new affordable or deed-restricted units that are developed will be added to the database and will be monitored annually to ensure they meet affordability requirements.

Table A-1 2013-2021 Housing Element Progress Report

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation & Responsible Agency
Housing Preservation Program	Assist 10 households annually and advertise the program on the City's website and periodically in the City's newsletter.	Ongoing	Administering loans from previously implemented HPP program. Implemented revised HPP program in 2017. Funding came from CDBG and Low/Moderate Housing Funds. In 2019 and 2020 staff provided five loans to West Covina homeowners. The City provides program application and information online.
Home Improvement Loan Program	Assist 50 households annually and advertise the program on the City's website and periodically in the City's newsletter.	Ongoing	Administering existing loans. No funding available for new loans at this time.
Monitor and Preserve Affordable Housing	Maintain a list of affordable units throughout the City including affordability information to ensure landlords are compliant with deed restrictions and to preserve affordable units.	Ongoing	Monitoring compliance of six affordable housing projects in the city, including Heritage Park, Lark Ellen Village, Mauna Loa Apartments, The Promenade, Senior Villas I and Senior Villas II. The City continues to monitor the status of existing affordable units within the city. There are 687 affordable units within the city.
Energy Efficient Design	Educate and encourage the use of energy conservation measures in the development of residential units. Provide information on funding programs.	Ongoing	The City encourages energy conservation and compliance with State laws as it relates to energy conservation for residential developments.
Code Enforcement	Address code enforcement violations as necessary.	Ongoing	The City provides a Code Enforcement program to bring substandard housing units into compliance with City building and property maintenance codes.
Acquisition and Rehabilitation	Provide technical and financial (when available) assistance for the development of 20 new affordable housing units and the rehabilitation of 50 units during the 2008-2014 planning period using a combination of federal, state, and local funds.	Ongoing	The City continues to inform multi-family housing developers of available sites and State and Federal programs. No developers have submitted projects. The Community Development Commission as the Housing Authority approved the loan refinancing of the Promenade Apartments that allows the property owner access to funds to rehabilitate all 124 affordable units.
Affordable Housing Financing	Maintain a list of mortgage lenders participating in the California Housing Finance Agency (CHFA) program.	Ongoing	Lenders participating in the CHFA program are available on request to the City.
Alternative Housing Models	Facilitate the development of alternative housing models (i.e., senior housing) suited to the community housing needs through the provision of flexible zoning regulations.	Ongoing	No developers have expressed interest or submitted projects to the City at this time.
Los Angeles County Partnership	Increase resident awareness about housing programs offered by the County by advertising them at City Hall and online.	Ongoing	The City provides Information on resources and programs offered by the County as well as other nonprofit organizations providing housing resources/programs. City staff provides information to residents seeking housing assistance as well as on the City's website.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation & Responsible Agency
Remove Development Constraints	On an annual basis, review development standards, to ensure that the development of lower income housing can occur. Revise the development code to address all constraints identified in Section 6 of the Housing Element.	Ongoing	The City processed Code Amendment No. 14-05 to address processing standards (including single-family additions and new houses) (effective 5/17/18), Code Amendment No. 17-03 to address accessory dwelling units standards (effective 7/19/18), Downtown Plan revision to address development and building-type standards (including for multi-family residential) (effective 9/20/18), Code Amendment No. 19-06 to address accessory dwelling units standards in compliance with State Law (effective 1/1/2020)
Flexible Development Standards	Continue to use flexible development standards to facilitate the development of affordable housing through promotion of maximum development densities in the multi-family zone and the new mixed-use overlay.	Ongoing	No developers have expressed interest or submitted projects at this time.
Density Bonus Ordinance	Promote the City's density bonus ordinance that offers bonuses for the provision of affordable housing, depending on the amount and type provided, consistent with revised Government Code §65915.	Ongoing	The City has standards in the Municipal Code for density bonuses in compliance with state law. No applications submitted in 2020.
Fast-track/Priority Application Processing	The City will assign senior staff to handle the projects, and staff assistance may be provided to prepare the necessary documents in half the typical processing time.	Ongoing	No applications were submitted to the City at this time.
Second-Unit Ordinance	Amend the Zoning Code to require only ministerial consideration of second-unit applications to encourage the creation of second units.	Ongoing	The City processed Code Amendment No. 19-06 to address accessory dwelling units standards (effective 1/1/2020) and has been continually working with HCD to ensure the City's Ordinance complies with current State Laws.
Manufactured Housing Mobile Home Rent Control	Encourage the provision of affordable housing by allowing manufactured housing (including mobile homes) in single family residential zones, subject to the conditions consistent with State law.	Ongoing	No permits issued for manufactured housing by the City at this time. No new mobile home parks proposed as of 2020.
Water and Sewer Service Providers	Immediately following the adoption and certification of the Housing Element, Staff will deliver copies to all providers of sewer and water service within the City of West Covina.	Ongoing	Letters mailed following adoption of Housing Element.
Flood Management	Ensure that flood risks are considered when making land use decisions.	Ongoing	The City continues to comprehensively review projects, specially projects located within moderate and minimal risk areas as identified by FEMA.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation & Responsible Agency
Fair Housing Program	Continue to assist households through the Housing Rights Center, and continue to refer fair housing complaints to the Housing Rights Center.	Ongoing	The City continues to promote fair housing practices and refer fair housing complaints to the Housing Rights Center. The City provided \$10,000 in CDBG funding to the Housing Rights Center.
Reasonable Accommodation	Create a process to make reasonable accommodation requests for land use and zoning decisions and procedures regulating the location, funding, development, and use of housing for people with disabilities.	Ongoing	The City has standards in the Municipal Code for reasonable accommodation. No reasonable accommodation requests were submitted in 2020.
Senior Center Shared Housing Program	Continue to operate the housing match program through the Senior Citizens' Center at Cortez Avenue with the goal of making 10 matches a year.	Ongoing	The City contributes to the funding of a social worker through the YWCA to assist seniors with housing placement.
Homeless Assistance Program	Provide \$200,000 in CDBG funding to care providers and associated facilities through 2014.	Ongoing	City provided \$81,396 to the four agencies mentioned in FY 19-20. As part of a collaborative grant proposal with the Cities of Azusa, Covina, Duarte, and Glendora to the County of Los Angeles, \$343,250 was awarded to the five Cities to fund Housing Navigators to perform outreach and case management to homeless persons in the five cities. West Covina was also awarded \$100,000 in Measure H funds to increase the availability of temporary beds through motel vouchers for those who are homeless in West Covina while they work through a housing plan with a Navigator. Both grant activities are being carried out through Union Station Homeless Services in Pasadena.
Foreclosures	Direct residents in need of foreclosure counseling to foreclosure help lines provided by the County of Los Angeles Department of Consumer Affairs and HUD.	Ongoing	The City will continue to provide information to residents seeking counseling regarding foreclosures. Residents with questions are directed to the County and HUD.
Housing for Developmentally Disabled Persons Program	Offer specific regulatory incentives when funding is available, apply for funding at least twice during the planning period.	Ongoing	The City continues to monitor for potential developers and funding programs. No applications have been submitted.
Ensure Adequate Sites to Accommodate the RHNA	Ensure sufficient residential capacity to accommodate the identified regional need for lower-income households.	Ongoing	The City has adopted a Downtown Plan and Code that allows mixed use and mid to high density residential development.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation & Responsible Agency
Lot Consolidation Program	Encourage lot consolidation of smaller parcels within the Mixed Use Overlay or for Affordable/Senior Housing with density bonus to accommodate projects including a minimum of 16 units at a density of at least 30 dwelling units per acre or higher.	Ongoing	The City continues to inform multi-family housing developers of development opportunities in the Mixed Use Overlay. No developers have submitted projects.
Provide Emergency and Transitional Housing	Ensure that the housing need of all residents is met by providing opportunities for transitional housing, emergency shelters and SRO units to be accommodated within the city.	Ongoing	The City's Municipal Code allows for the development of emergency shelters and efficiency units. No applications have been received at this time.

Appendix B

Site Inventory

This chapter documents the methodology and results of the Housing Site Inventory analysis conducted to demonstrate the City of West Covina’s ability to satisfy its share of the region’s future housing needs.¹ The Site Inventory was developed through the analysis of development trends, the identification of vacant and nonvacant land with residential development potential, and community input.

B.1 Future Housing Needs

State law requires every community to undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate regional housing needs. A jurisdiction must demonstrate in the Housing Element that it has an adequate supply of suitable land to accommodate its share of the region’s projected growth, including housing at all income levels. This section assesses the adequacy of West Covina’s land inventory in meeting future housing needs.

B.1.1 Regional Housing Needs Allocation

This update of the City of West Covina’s Housing Element covers the planning period of October 2021 through October 2029 (called the 6th cycle Housing Element update). Each jurisdiction’s share of the regional housing need is called the Regional Housing Needs Allocation (RHNA). The Southern California Association of Governments (SCAG) is responsible for developing a methodology for allocating the regional determination for each city and county in its region. This methodology must align with State objectives, including but not limited to:

- Promoting infill, equity, and environmental protection
- Ensuring jobs-housing balance
- Affirmatively furthering fair housing

The 6th cycle RHNA is based on population projections, income distribution, and access to employment opportunities. SCAG adopted its 6th Cycle Final RHNA Allocation Plan² in March 2021 and amended the RHNA allocation plan in July 2021 after considering appeals from jurisdictions.

¹ Government Code section 65100 – 65763, Article 10.6. Housing Elements

² SCAG 2021. 6th Cycle Final RHNA Allocation Plan. <https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-proposed-final-allocation-plan.pdf?1614911196>

West Covina must identify adequate land with appropriate zoning and development standards to accommodate its RHNA, which is 5,346 housing units for the 6th cycle. According to the U.S Census Bureau, a housing unit can be defined as a house, an apartment, a group of rooms, or a single room occupied or intended for occupancy as separate living quarters. Residential construction that cannot be counted toward the City's RHNA allocation includes dormitories, quarters in predominantly transient hotels and motels (except those occupied by persons who consider the hotel their usual place of residence), quarters in institutions, general hospitals, and military installations (except those occupied by staff members or resident employees who have separate living quarters).³

The RHNA methodology considers indicators such as opportunity accessibility and job proximity by auto and transit to allocate housing units to different income categories within a region in order to reduce over-concentration of lower income households in historically lower-income communities in the region as mandated by the State. The RHNA for each jurisdiction is distributed into the following four income categories based on the area median income (AMI):⁴

- Very low-income (less than 50 percent of AMI)
- Low-income (50-80 percent of AMI)
- Moderate-income (80-120 percent of AMI)
- Above-moderate income (more than 120 percent of the AMI)

The RHNA does not allocate for extremely low-income units, but State law AB 2643 requires cities to either project extremely low-income housing needs based on Census income distribution data or to assume 50 percent of the very low-income units required by the RHNA as extremely low-income units. According to the Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD, 29.7 percent of households in West Covina earn less than 50 percent of the Los Angeles County AMI. Among these households, 53.8 percent earn incomes below 30 percent of the AMI (extremely low-income). The City's very low-income requirement is 1,653, therefore, the City's RHNA allocation of very low-income units was assumed 890 extremely low (53.8 percent of the 1,653 very low-income units required by the RHNA) and 763 very low-income units, however, for the purposes of identifying adequate sites for the RHNA allocation, State law does not mandate the separate accounting for the extremely low-income category.

As shown in Table B-1, 37 percent of West Covina's RHNA is allocated to housing units affordable to above-moderate income households, 16.2 percent for moderate-income households, 15.9 percent for low-income households, and 30.8 percent for very low-income households (including 16.6 percent for extremely low-income households).

³ HCD. Housing Element Site Inventory Guidebook Government Code Section 65583.2. June 2020. https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf

⁴ The Area Median Income of The County of Los Angeles is \$91,000 for a household of four people.

Table B-1 West Covina Regional Housing Needs Requirement Allocation

Income Category (% of Los Angeles County Area Median Income [AMI])	Number of Units	Percent of Total Units
Extremely Low (< 30% of AMI)*	890	16.6
Very Low (30 to 50% of AMI)	763	14.3
Low (51 to 80% of AMI)	850	15.9
Moderate (81% to 120% of AMI)	865	16.2
Above Moderate (> 120% of AMI)	1,978	37.0
Total	5,346	100.0%

Source: SCAG Pre-Certified Local Housing Data for the City of West Covina, August 2020.

B.2 Meeting the RHNA

All jurisdictions must identify adequate land with appropriate zoning and development standards to fulfill their required RHNA. Jurisdictions may utilize planned, approved, and/or entitled projects (pipeline projects), estimated accessory dwelling unit (ADU) production, and vacant or nonvacant sites to accommodate the RHNA. Each of these topics are addressed in this section.

Once the City demonstrates that it has the development capacity to accommodate the RHNA, it has two implementation-related obligations during the planning period:

1. Maintain a “no net loss” policy of its residential development capacity over the housing element planning period, meaning that sites listed in the adopted Housing Element land inventory may not be down-zoned to a lower-density residential zone or rezoned to a nonresidential zone, unless the City upzones or rezones alternative sites prior to the density reduction or rezone on the inventoried site.
2. Continue to allocate available funding resources to and facilitate the development of affordable housing.

B.2.1 RHNA Credits

The city may use units in pipeline projects which will be completed within the 2021 – 2029 planning period and anticipated ADU production towards fulfillment of its RHNA.

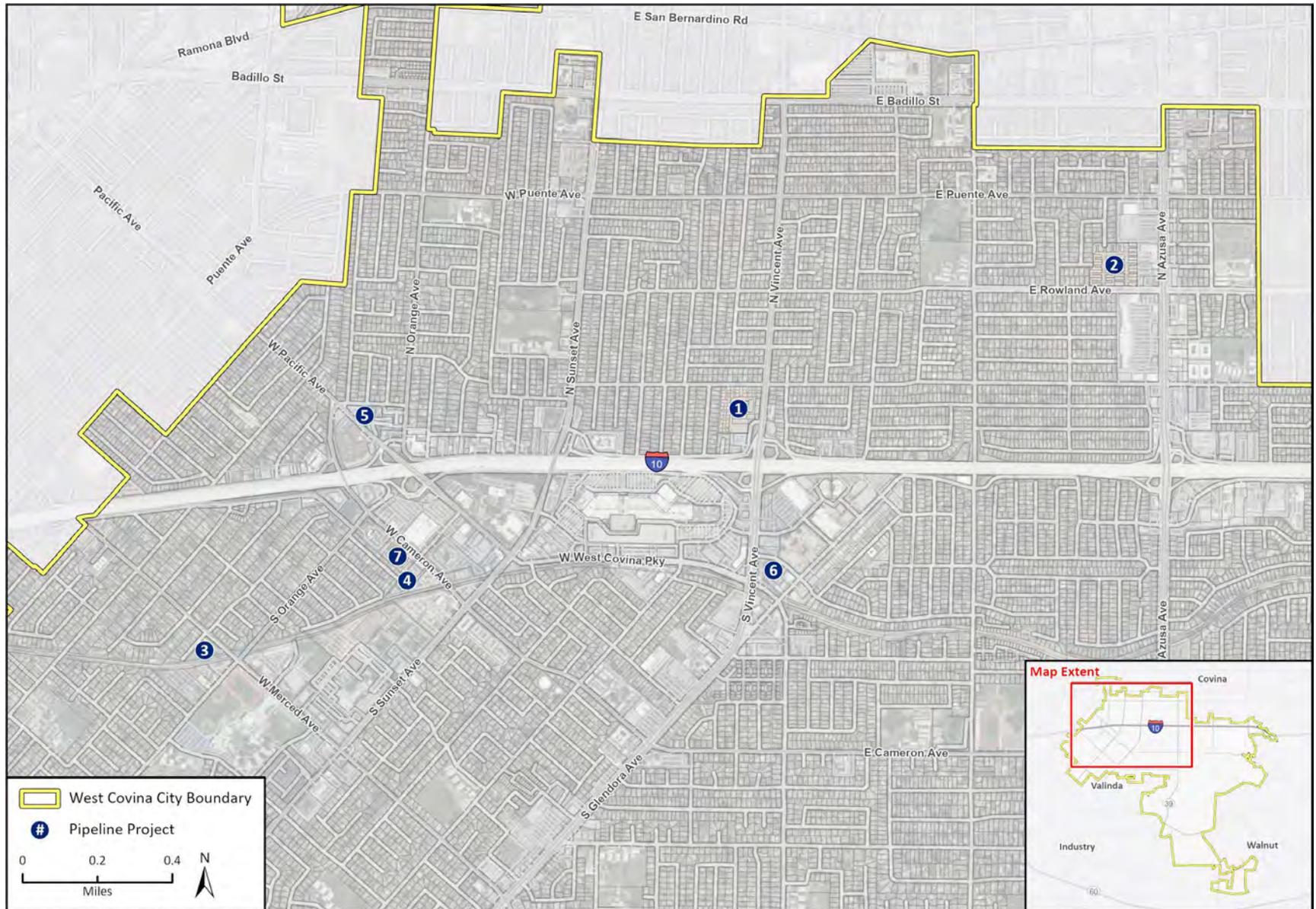
Pipeline Projects

Housing units that have received planning entitlements or that have secured building permits can be used in the Site Inventory toward meeting the City’s share of the RHNA for the 6th cycle Housing Element. These units can count toward the RHNA based on their estimated affordability levels when they were approved or permitted. Pipeline projects can be credited toward the City’s RHNA goals only if the City can demonstrate that the units will be completed (i.e., received building permit or a Certificate of Occupancy) during the planning period. Affordability (the income category in which the units are counted) is based on the actual or projected sale prices or rent levels, based on each project’s Inclusionary Housing Plan, which is reviewed during the entitlement stage. As shown on Table B-2, majority of the units in the pipeline are market rate allocated to the above moderate-income category. The average achieved density of these projects is approximately 83 percent of the maximum density allowed in each zone. Figure B-1 shows the location of the pipeline projects.

Table B-2 Pipeline Projects

Map ID	Project/ Type	Address	General Plan/Zoning	Parcel Size (acres)	Very Low-Income Units	Low-Income Units	Moderate -Income Units	Above Moderate-Income Units	Units	Prior Use on the Site	Allowable Density (du/ac)	Project Density (% of max)	Approval Date
1	Vincent Place SP/ Townhouse (2 & 3-story)	1024 W. Workman Ave	Neighborhood Medium/ Specific Plan	8.05	0	0	10	109	119	Public School	9 – 20	14.8 (74%)	2021
2	Walnut Grove SP/ Townhouse (2 & 3-story)	1651 E. Rowland Ave	Neighborhood Medium/ Specific Plan	9.14	0	0	12	146	158	Public School	9 – 20	17.3 (87%)	2021
3	The Grove at Merced SP (2 story townhouse)	1912 W. Merced Ave	Specific Plan	2.26	0	0	5	34	39	Public School	9 - 20	17.3 (87%)	2022
4	Cameron 56/ Townhouse (3-story)	1530 W. Cameron Ave	Neighborhood Medium/ Downtown/T-4 General Urban	2.82	0	0	0	56	56	Office Building	9 – 20	19.8 (99%)	2018
5	Pacific Lane Condo (2-story)	1920 W. Pacific Lane	Neighborhood Medium/ MF-20	0.62	0	0	0	7	7	Single-Family Residential	9 – 20	11.3 (57%)	2018
6	Walnut Creek	Walnut Creek Parkway and Vincent Avenue	Neighborhood High / General Urban	0.96	0	0	0	51	51	Parking Lot	21 – 54	53.1 (98%)	2023
7	West Cameron II	1600-1616 W. Cameron Avenue	Neighborhood High / General Urban	3.25	0	0	10	74	84	Commercial	21 – 54	25.8 (47%)	2021
	Total				0	0	27	403	430			Avg = 83%	

Figure B-1 Pipeline Projects



Basemap provided by Esri and its licensors © 2023.
 Additional data provided by LA County, 2023.

23-14758 HE_AFFH
 Fig X Pipeline Projects

Accessory Dwelling Units

ADUs anticipated to be constructed during the 6th cycle Housing Element can also be credited toward the City's RHNA. An ADU is a secondary dwelling unit located on residentially zoned property that has an existing single-family or multi-family residence. Due to its small square footage, an ADU could provide affordable housing options for family members or friends of the primary residence, students, elderly persons, in-home health care providers, persons with disabilities, and others.

According to the City's Housing Element Annual Progress Report (APR), permits were issued for zero ADUs in 2018, seven ADUs in 2019, 11 ADUs in 2020, 49 ADUs in 2021, and 139 ADUs in 2022. which is an average of 41 ADUs per year from 2018 to 2022. The number of ADU permits issued so far during the 6th cycle significantly exceeded the average number of ADUs permitted in the last 5 years. The increase in ADU permits from 2021 to 2022 is likely attributed to State legislation reducing regulatory barriers to ADU construction and the adoption of the City's ADU Ordinance in 2021.⁵ Table B-3 summarizes the total number of ADU permits issued between 2018 and 2022.

Table B-3 Accessory Dwelling Unit Production, City of West Covina

Reporting Year	ADU Building Permits Issued
2018	0
2019	7
2020	11
2021	49
2022	139
Total	328
Annual Average	41

Based on the City's ADU permit trends and SCAG's ADU affordability analysis,⁶ it is assumed that an average of 41 ADUs per year (a total of 328 total ADUs during planning period) will be produced in the following income categories during the 2021-2029 projection period:

- 24 percent very low-income households (80 units)
- 45 percent low-income households (149 units)
- 2 percent moderate-income households (7 units)
- 29 percent above-moderate households (92 units)

B.2.2 Summary of RHNA Credits

After counting anticipated units from pipeline projects and ADUs, the City must demonstrate its ability to meet its remaining housing needs through the identification of sites suitable for housing development. Table B-4 shows the remaining RHNA after accounting for RHNA credits.

⁵ City of West Covina. Ordinance No.2480. 2021.

<https://www.westcovina.org/home/showpublisheddocument/19863/637625643903100000>

⁶ ADU Affordability Analysis, Southern California Association of Governments, 2021

Table B-4 Remaining Share of RHNA

Income Category	RHNA Allocation	Units Pending or Approved or Under Construction	Estimated ADUs	Remaining RHNA
Very Low	1,653	0	80	1,573
Low	850	0	149	701
Moderate	865	27	7	831
Above Moderate	1,978	403	92	1,483
Total	5,346	430	328	4,588

B.3 Regional Development Trends

After considering pipeline projects and permitted ADUs, the City must identify sites that have a realistic likelihood of developing with residential uses during the 6th cycle planning period. To determine likelihood of development, recent regional development analyzed to determine conditions prior to development such as previous use, improvement-to-land value ratio (ILV), floor area ratio (FAR), and structure age. This analysis was used to identify similar sites that share these characteristics.

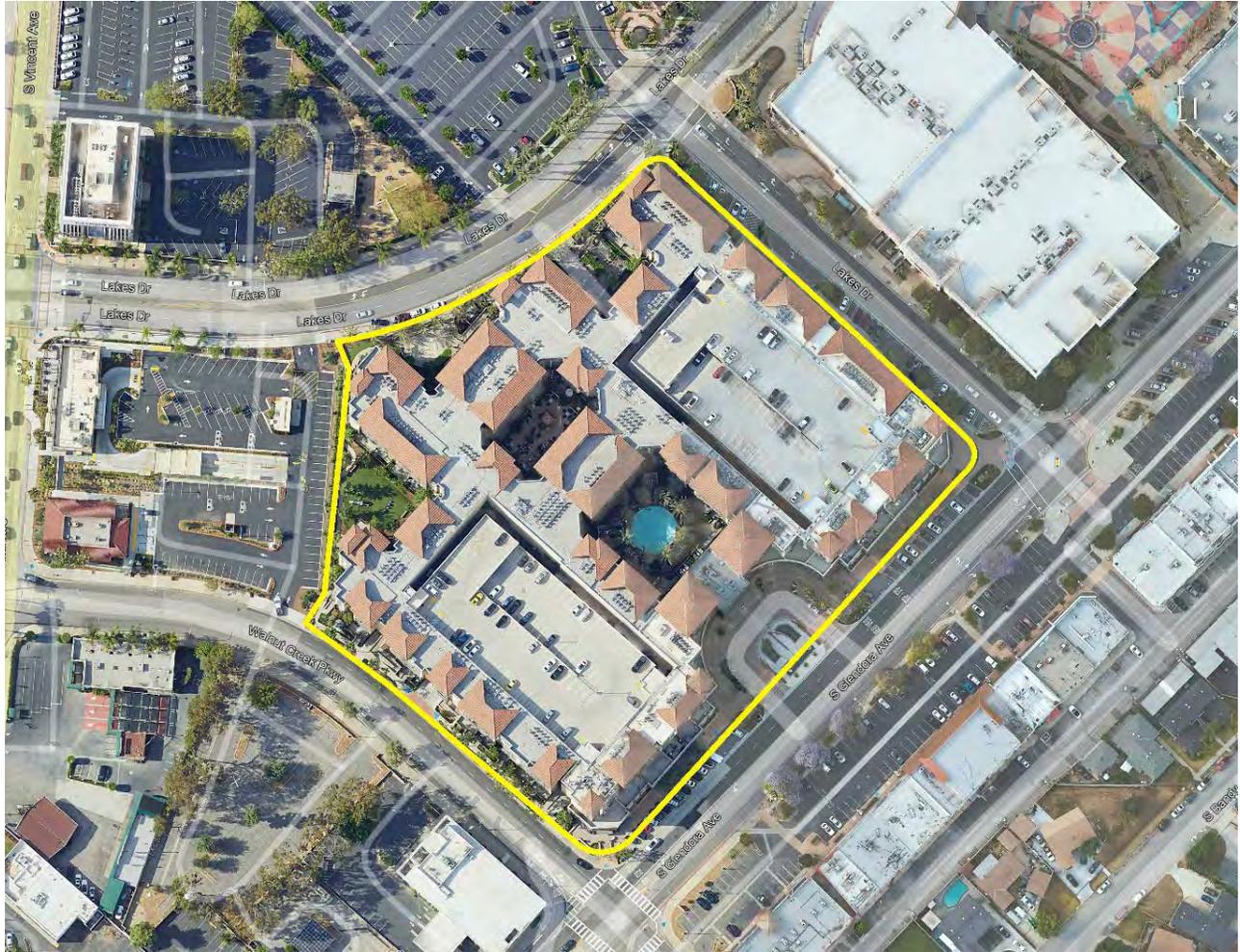
Recent real estate development trends in the San Gabriel Valley have been highly favorable for multi-family development and the City has seen significant interest in residential redevelopment on nonvacant properties. Development trends illustrate the strong interest in multi-family and mixed-use redevelopment in West Covina in recent years. These examples demonstrate that existing uses on nonvacant commercial properties do not constitute a significant impediment to redevelopment. While the assessed ILV ratio is often used as an indicator of economic underutilization, it should be noted that limitations on these sites do exist. For example, assessments under Proposition 13 can distort ILV ratios when a property has not sold and/or been reassessed at market value in many years.

The majority of projects listed below consist of the redevelopment of nonvacant uses to market-rate residential uses, available to either moderate- or above moderate-income households. The achieved densities of these projects range from 14.78 to 73.89 dwelling units per acre. The average density of these projects is 22.97 dwelling units per acre. Projects located in medium-density residential zones averaged 75 percent density achieved, and projects in high-density residential zones achieved 70 percent of allowable density. In the Downtown General Urban Zone (T-4), projects averaged 38 dwelling units per acre and achieved an average of 80 percent of the allowable density. Table B-5 summarizes the allowable density and achieved density for each project. Details of each project are discussed below.

Table B-5 Development Trends for Recent Projects

Project Name	Total Units	Site Acreage	Achieved Density (du/ac)	Zoning District	Allowable Density (du/ac)	Number of units allowed	ILV (average)	Percent Density Achieved
Colony at The Lakes	450	6.57	68.49	T-4	75	493	N/A	91%
Asteria	158	9.14	17.29	R-1	20	183	0	86%
56 Cameron	56	2.82	19.86	T-4	20	56	0.62	100%
West Cameron II	84	3.25	25.85	T-4	54	176	1.24	48%
Seville at Vincent Place	119	8.05	14.78	SP	20	161	0	74%
Pacific Lane	7	0.62	11.29	MF-20	20	12	0.21	56%
Holt Avenue	48	5.35	8.97	SP	20	107	1.25	45%
The Grove at Merced	39	2.26	17.26	SP	20	45	0.43	86%
Average	120	4.76	22.97		29	137	0.82	78%

Colony at The Lakes



APN	8474-010-010	Developer	Lennar
Location	301 South Glendora Avenue	Year Built	2016
Development Type	Mixed-use	Previous Use	Commercial
Parcel Size	6.57 ac	FAR / Density	0.46 / 68.5 dwelling units per acre

Colony at the Lakes is a mixed-use development located in the western portion of West Covina at the intersection of Glendora Avenue and Walnut Creek Parkway. This project was developed in 2016 and features 450 multi-family units. This project is in the General Urban Zone which allows a maximum density of 75 units per acre and a maximum unit capacity of 493 units. This project was developed with 450 units and achieved 91 percent of allowable density.

Asteria



APN	8442-018-900 & 8442-021-900	Developer	Lennar
Location	1651 E Rowland Ave	Year Built	Under Construction
Development Type	Medium Density Residential	Previous Use	School
Parcel Size	9.14 ac	FAR / Density	0.10 / 17.3 dwelling units per acre

Asteria is a medium density residential neighborhood located in the northern portion of West Covina at the intersection of East Rowland Avenue and Azusa Avenue. The community currently being developed will feature 158 dwelling units. This project is in the Specific Plan zone which relies on the General Plan Land Use designation to determine density. The General Plan Land Use for this project is Neighborhood Medium, which allows a maximum density of 20 units per acre and a maximum unit capacity of 183 units. This project will develop with 158 units and will achieve 86 percent of allowable density.

56 Cameron



APN	8468-016-008	Developer	Meritage Homes
Location	1630 W Cameron Avenue	Year Built	2020
Development Type	Medium Density Residential	Previous Use	Office/Commercial
Parcel Size	2.82 ac	FAR / Density	0.13 / 19.9 dwelling units per acre

56 Cameron is a medium density residential development located in the western portion of West Covina at the intersection of Cameron Avenue and Sunset Avenue. This community was developed in 2020 and features 56 dwelling units. This project is in the General Urban Zone with a General Plan Land Use of Neighborhood Medium, which allows a maximum density of 20 units per acre and a maximum unit capacity of 56 units. This project was developed with 56 units and achieved 100 percent of allowable density.

West Cameron II



APN	8468-015-010 & 8468-015-024	Developer	Meritage Homes
Location	1600 & 1616 West Cameron Avenue	Year Built	Under Construction
Development Type	Medium Density Residential	Previous Use	Commercial
Parcel Size	3.25 ac	FAR / Density	0.16 / 25.8 dwelling units per acre

West Cameron II is a medium density residential development located in the western portion of West Covina at the intersection of Cameron Avenue and Sunset Avenue. This project is currently under construction and will feature 84 dwelling units. This project is in the General Urban Zone with a General Plan Land Use of Neighborhood High, which allows a maximum density of 54 units per acre and a maximum unit capacity of 176 units. This project will develop with 84 units and will achieve 48 percent of allowable density.

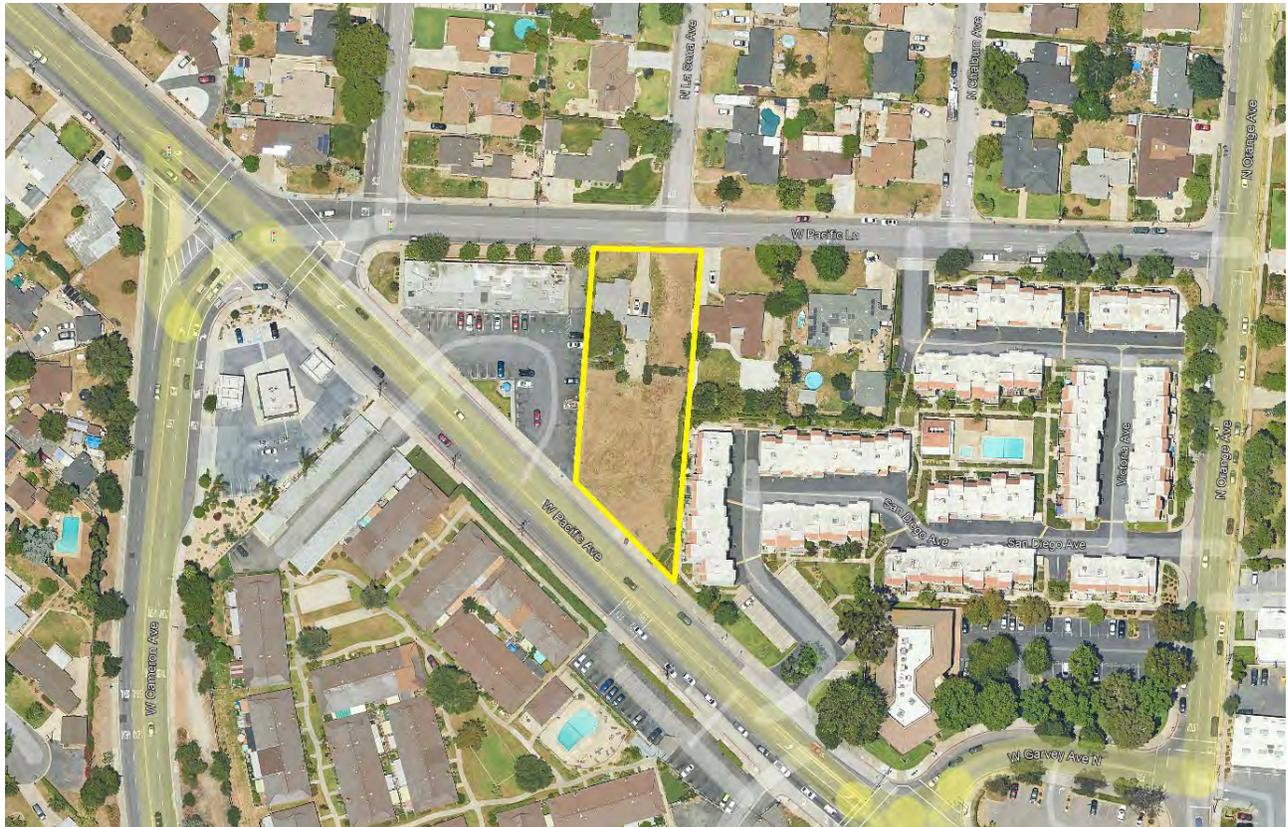
Seville at Vincent Place



APN	8457-029-906	Developer	Meritage Homes
Location	225 N Vincent Ave	Year Built	Under Construction
Development Type	Medium Density Residential	Previous Use	School
Parcel Size	8.05 ac	FAR / Density	0.12 / 14.8 dwelling units per acre

Seville at Vincent Place is a medium density residential neighborhood located in the northern portion of West Covina at the intersection of Vincent Avenue and West Workman Avenue. This community is currently being developed and will feature 119 dwelling units. This project is in the Specific Plan zone which relies on the General Plan Land Use designation to determine density. The General Plan Land Use for this project is Neighborhood Medium, which allows a maximum density of 20 units per acre and a maximum unit capacity of 161 units. This project will develop with 119 units and will achieve 74 percent of allowable density.

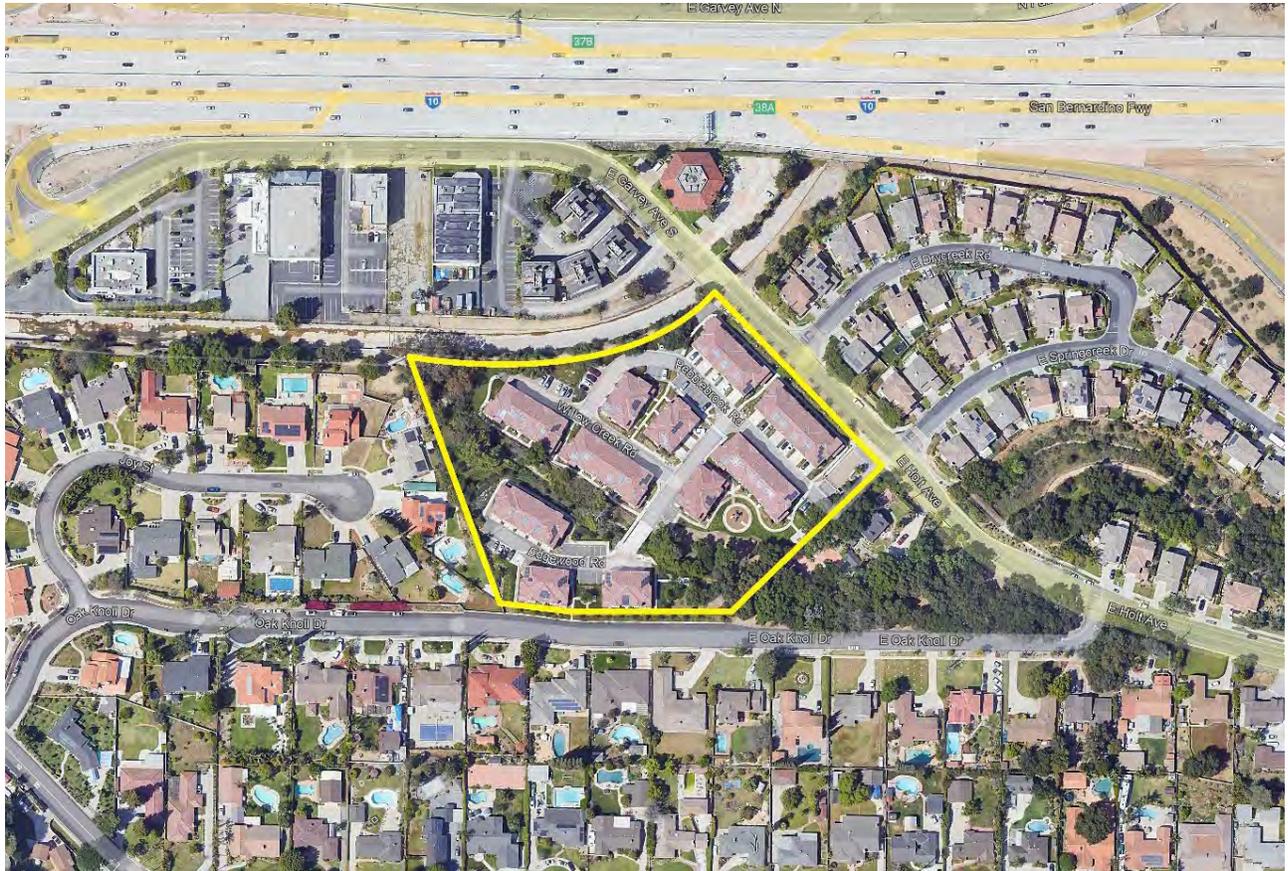
Pacific Lane



APN	8459-026-002 & 8459-026-003	Developer	SP Homes
Location	1920 W. Pacific Lane	Year Built	Under Construction
Development Type	Medium Density Residential	Previous Use	Single-Family Residential
Parcel Size	0.62 ac	FAR / Density	0.06 / 11.3 dwelling units per acre

Pacific Lane is a medium density residential development located in the northwestern portion of West Covina at the intersection of Pacific Lane and Pacific Avenue. This development is currently under construction and will feature seven dwelling units. This project is in the multi-family residential zone which allows a maximum density of 20 units per acre and a maximum unit capacity of 12 units. This project will develop with seven units and will achieve 56 percent of allowable density.

Holt Avenue



APN	Varies	Developer	-
Location	3228/3238/3244 Holt Avenue	Year Built	2016
Development Type	Medium Density Residential	Previous Use	Vacant/ Single Family Residential
Parcel Size	5.35 ac	FAR / Density	0.03 / 9.0 dwelling units per acre

Holt Avenue is a medium density residential development located in the eastern portion of West Covina at the intersection of Holt Avenue and Oak Knoll Drive. This project was developed in 2016 and features 48 dwelling units. This project is in the Specific Plan zone with a General Plan Land Use of Neighborhood Medium, which allows a maximum density of 20 units per acre and a maximum unit capacity of 107 units. This project was developed with 48 units and achieved 45 percent of allowable density.

The Grove at Merced



APN	8467-016-020	Developer	-RC Homes
Location	1912 W Merced Ave	Year Built	Approved Specific Plan
Development Type	Medium Density Residential	Previous Use	School
Parcel Size	2.26 ac	FAR / Density	0.08 / 17.3 dwelling units per acre

The Grove at Merced is a medium density residential development located in the western portion of West Covina at the intersection of Merced Avenue and Orange Avenue. This development is currently an approved specific plan and will feature 39 dwelling units. This project is in the Specific Plan zone with a General Plan Land Use of Neighborhood Medium, which allows a maximum density of 20 units per acre and a maximum unit capacity of 45 units. This project will develop with 39 units and will achieve 86 percent of allowable density.

B.4 Realistic Development Capacity

In creating a realistic development assumption, the City assumes that the development capacity on each site will be less than the full development capacity allowed by the parcel's zoning or land use designation. Sites do not always develop to their full capacity due to factors including site-specific conditions and development standards such as open space and parking requirements. To determine a realistic development achievement on the sites in the inventory, the City reviewed the development achievement of pipeline and recently developed projects in the region. On average, the pipeline projects in West Covina (Table B-2) achieved an average density of 80 percent of the maximum density allowed on the site based on the site's zoning and development standards. Based on the development

trends within the city, the average achieved density for projects collectively is 78 percent. Based on the pipeline projects and development trends, the City conservatively assumes the realistic capacity of each site would be 75 percent of the maximum allowable density in each zone.

The Site Inventory includes parcels in nine zoning districts with varying allowable densities and development standards. The City's Zoning Code classifies each site into the following zones:

- T-4 General Urban Zone (GU): This zone allows for ground floor commercial, retail, and office activity. Upper floors and the floor area behind shopfronts is flexible for a wide variety of office, civic, lodging, housing, or additional commercial uses. It allows for mixed-use residential with a variety of densities allowed, but typically have a maximum of either 20 units per acre or 54 units per acre.
- T-4 Urban Neighborhood Zone (UN): This zone allows for residential uses, limited live/work uses and home occupation activity. This zone is applied to areas at the edge of Downtown District. The zone is comprised primarily of single family, and single-family compatible multi-family residential uses including live/work, with a maximum density of 20 units per acre.
- T-5 Urban Center Zone (UC): This zone allows for ground floor commercial, retail, and office activity. Upper floors and the floor area behind shopfronts is flexible for a wide variety of office, civic, lodging, housing, or additional commercial uses. It allows for mixed-use residential with a variety of densities allowed, but typically have a maximum of either 20 units per acre or 54 units per acre.
- Multi-Family Residential (MF-20): This zone allows for multi-family residential uses with a maximum density of 20 dwelling units per acre.
- Neighborhood-Commercial Mixed-Use (NMU): This zone allows for retail and service commercial uses as well as residential uses with a maximum residential density of 20 dwelling units per acre.
- Office-Professional Mixed-Use (OPMU): This zone allows for business, office, administrative or professional uses and residential uses with a maximum residential density of 20 units per acre.
- Regional-Commercial Mixed-Use (RMU): This zone allows shops, eating and entertainment facilities, business and financial services and multi-family residential uses with a maximum density is 20 units per acre.
- Service-Commercial Mixed-Use (SMU): This zone allows for retail and service commercial, recreational, business office and multi-family residential uses with a maximum density is 20 units per acre.
- Planned Community Development (PCD-1): This zone allows for a variety of housing types and all densities shall conform to the approved community master plan.
- Single-Family Residential (R-1): This zone allows for single-family residential uses with a maximum residential density of 7.3 dwelling units per acre.

The distribution of income levels among sites was determined by zone, RHNA income level allocation, and acreage. It is typical for units in single-family zones to be allocated to the above moderate-income category. Within multi-family zones that have a higher density, lower-income units can be accommodated, however, units in multi-family zones can also be distributed amongst all income categories if allowable densities are sufficient. Distribution

is also determined by the total RHNA income level allocation. In some cases, there are a higher number of units needed within an income category, so there will be a heavier distribution of those units across all zones. Table B-6 details the realistic capacity of available sites by zoning district.

Table B-6 Realistic Capacity of Sites by Zoning District

Zoning District	Total Acreage	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
General Urban (T-4)	58.29	Varies	Varies	776	239	436	1,451
Urban Neighborhood (T-4)	1.40	20	15	0	6	15	21
T-5	59.27	54	40.50	1,779	597	25	2,400
MF-20	1.43	20	15	0	6	15	21
NMU	32.75	20	15	0	75	416	491
OPMU	11.09	20	15	0	50	116	166
RMU	6.79	20	15	0	31	71	102
SMU	62.85	20	15	0	249	694	943
PCD-1	6.59	20	15	0	28	71	99
R-1	1.00	7.3	5.48	0	0	5	5
Total	182.19			2,555	1,280	1,865	5,700

B.4.1 Likelihood of 100 percent Nonresidential Uses on Sites

The City identifies units in zones that allow for 100 percent nonresidential uses. In accordance with State law, the housing element must consider the likelihood of nonresidential development on sites that allow for nonresidential uses. To determine likelihood, the City reviewed development that has occurred in nonresidential zones within the last five years.

In the last five years, the City has had five developments in the Downtown Plan area in the General Urban and Urban Center zones. Of these projects, four have been approved for development with housing, while one developed with a nonresidential use. This represents an 80 percent rate of residential development in nonresidential zones.

The Site Inventory accounts for this percentage by providing an adequate buffer of units in all income categories. If 20 percent of the Downtown Plan sites in the T-4 zone were developed with 100 percent nonresidential uses, the Site Inventory would still maintain a 30 percent buffer of moderate-income units and a 18 percent buffer of above moderate-income units, however it would be deficient by 9 percent in the lower-income units. This should not become an issue since the Housing Element and the Downtown Plan have programs in place to increase residential development in the area. A vast majority of the projects in this area will have a residential component. Additionally, with the Site Inventory as it stands, the lower income units have a buffer of 14 percent. Furthermore, the inventory conservatively assumes a realistic allowable density of 15 dwelling units per acre when the underlying land use is commercial or medium density residential in the General Urban zone, and a realistic allowable density of 40 dwelling units per acre in the Urban Center zone or when the underlying land use in high density residential in the General Urban zone, which allows for a maximum of 20 and 54 units per acre respectively. The City will implement Program 5.1 to evaluate all development in the mixed-use to better determine how often

development has a residential component and make adjustments, as necessary, to maintain adequate sites throughout the planning period.

B.5 Site Inventory Overview and Analytical Approach

As with many mature communities in the highly urbanized areas of Los Angeles County, West Covina has almost no vacant land suitable for residential development. Pursuant to Government Code §65583.2(g)(2) when a city is relying on underutilized non-vacant sites to accommodate 50 percent or more of its lower-income housing need, the methodology used to determine additional development potential shall demonstrate that the existing use does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period. The following analysis has been prepared in conformance with these provisions of State law.

Most new residential development in West Covina is expected to occur in two general areas: the Downtown Plan Area and Mixed Use Zones. Analysis of the land use characteristics of these areas and potential development is provided below.

B.5.1 Downtown Plan Area

A primary focus of the City's General Plan is encouraging the redevelopment and improvement of the City's Downtown, which includes the Plaza West Covina shopping mall, located south of Interstate 10. In 2016 the City adopted the Downtown Plan & Code,⁷ which includes development standards to encourage and facilitate the development of higher-density residential infill and mixed-use projects by allowing reduced parking requirements and deviations from the standards typically required in multi-family residential zones. Residential densities up to 54 units per acre are allowed in the Downtown Plan area.

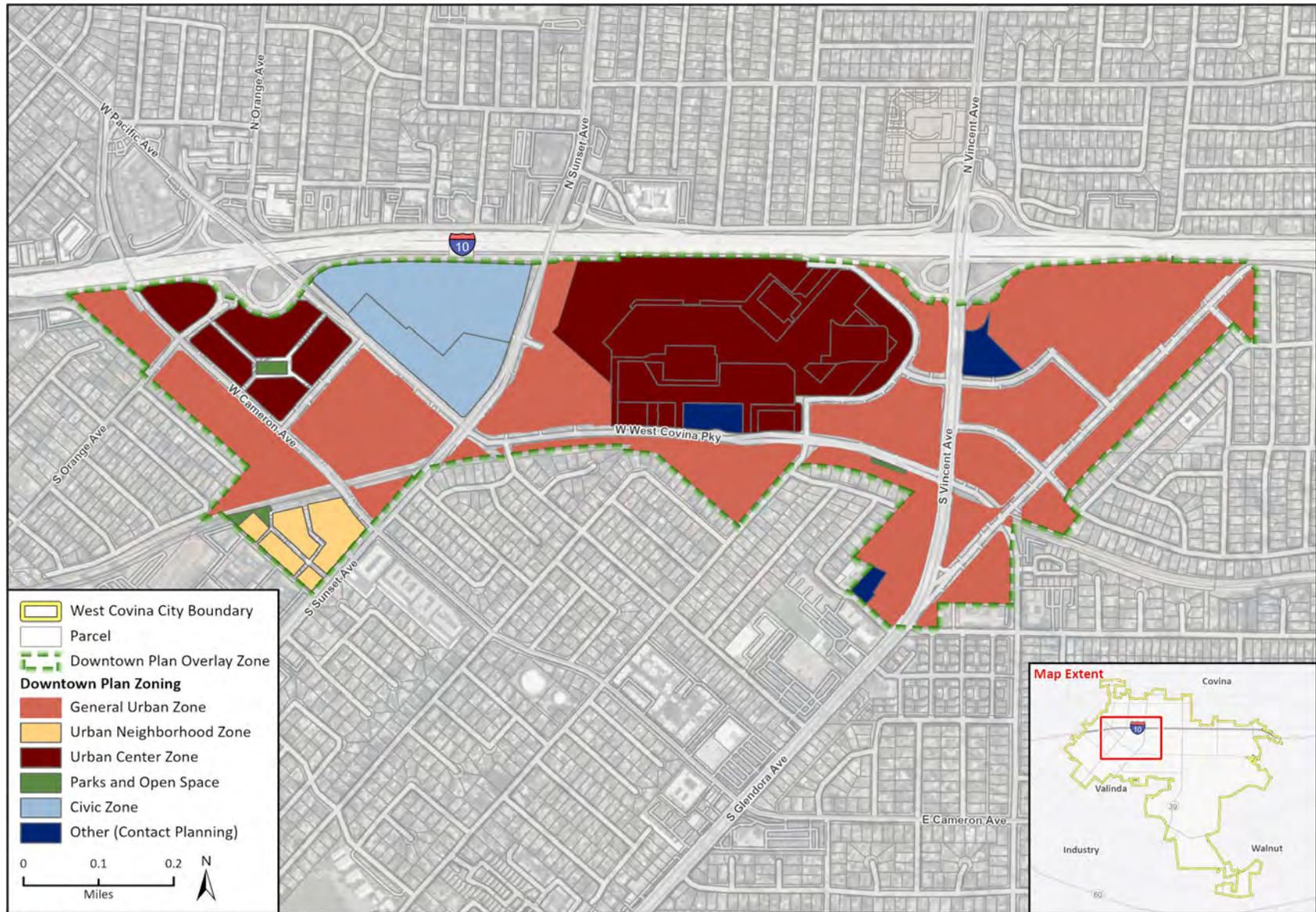
As stated in the Downtown Plan, the Plaza West Covina mall was selected for redevelopment because much of the retail space in the City and the Downtown area is aging, sales tax revenues per square foot are lower than comparable cities with super-regional shopping centers, and residents are spending as much as \$45 million on food and beverage in other communities. To remain competitive, underutilized retail space may need to be renovated or repositioned into more productive retail or other uses. The other uses are likely to be housing, as it is allowed in all zones in the Downtown Plan (T-4 and T-5), and advocated for in Goal 7: provide high-quality, urban housing for a diverse range of income levels. This is showcased in the nine private projects within the Downtown Plan. These projects included in the Site Inventory range from mixed-use campuses to multi-family housing. There are three projects used to establish development trends and discussed earlier in this section, developed or under construction in the Downtown Plan Area: Colony at The Lakes, 56 Cameron, and West Cameron II. These sites are in the T-4 zone and have an average achieved density of 80 percent.

⁷ City of West Covina. 2016. Downtown Plan & Code.
<https://www.westcovina.org/home/showpublisheddocument/16159/636825569882870000>

B.5.2 Mixed Use Zones

The General Plan encourages a wide range of building types within the Commerce land-use designation, including a mix of functions such as commercial, entertainment, office, and housing at densities up to 54 units per acre in the Downtown Plan area and up to 20 units per acre outside the Downtown Plan area. The various Mixed-Use zones (OPMU, NMU, RMU, and SMU) establish development standards for housing and mixed-use at densities up to 20 units per acre in non-residential zones outside the Downtown Plan area consistent with the intent of the General Plan. Allowable residential uses in these zones include single-family detached or attached units, home occupations and low barrier navigation centers. SB 35 projects and developments providing at least 25% low-income units are eligible for ministerial review and approval by the Community Development Director subject to the Multifamily Objective Design Standards. A minimum leasable commercial gross FAR of 0.15 is required for mixed-use projects to serve residential uses with a 45-foot height limit. There are no residential development projects currently proposed in other mixed-use zones (Manufacturing [M-1] zone) because residential uses are not currently allowed. Zoning changes are part of a Development Code update, which is anticipated to be adopted in January 2024. The City currently has a mixed-use overlay, established in 2022. While there has been interest, the City has not received any residential or mixed-use development proposals for the overlay area.

Figure B-2 Downtown Plan Overlay Zone



B.6 Nonvacant Site Selection Criteria

To select potential sites for additional residential development, geospatial data was used to identify vacant and nonvacant underutilized properties within the city. The selection of nonvacant parcels was based on a number of factors, including those discussed below. Table B-7 provides an assessment of each site based on these factors.

Sites meeting Criteria 1, 2, 3 or 4 are included in the Site Inventory:

1. Vacant

Sites that are vacant offer the most feasibility for redevelopment.

2. Developer Interest

Sites with developer interest present the best probability for near-term redevelopment.

The City has listed six sites with developer interest, four of which are included in the Site Inventory (these include sites 2, 4, 5, 12, 135, and 189). These developers are all interested in developing multi-family housing.

3. Surface Parking

Large surface parking lots have potential for redevelopment as these properties have limited existing structures to impede redevelopment in the near term. As shown in Table B-2, several pipeline projects are being proposed on properties with large surface parking areas such as schools and office buildings.

4. Vacant Buildings

Some properties are included in the Site Inventory because the existing conditions or design of the buildings are not meeting the needs of current trends, resulting in high vacancies or vacated buildings. Substantial improvements may be needed to turn around the profitability of the existing uses. Redevelopment into higher and better use may be a more feasible option.

For sites not meeting Criteria 1, 2, 3, or 4, they must meet at least two of the following five criteria (#5 through #8) to be included in the Site Inventory. It should be noted that not all factors are applicable to all sites. For example, FAR is more relevant for nonresidential uses.

5. Single-Story Buildings

Parcels with existing single-story buildings offer significant potential for redevelopment and maximizing the utilization of the sites. The Site Inventory focuses on identifying sites in commercial and multi-family zones, where height limits range from 25 feet to 45 feet stories. As shown in Table B-2, one of the five pipeline projects are redevelopment on properties with single-story buildings.

6. Improvement-To-Land Value Ratio

A parcel's improvement-to-land value (ILV) ratio can help quickly identify properties that are potentially underutilized. A ratio of less than 1.0 indicates that the real estate market values the land itself more highly than what is currently built on that land. These underutilized parcels

represent opportunities for property owners and developers to invest in further improvements that increase the overall value of the property. It should be noted that the ILV ratio of a property does not necessarily consider development standards or environmental constraints that may impact the feasibility of redevelopment on the site. Approximately 94 percent of the total units are located on sites with an ILV ratio of less than 1.0. Additionally, the development trend averages an ILV of 0.82 with two projects, West Cameron II (1.24) and the Grove at Merced (1.25), with ILV ratios over 1.0, indicating that redevelopment is feasible on parcels with high ILV ratios.

It should be noted that the Assessor's records do not contain data for some properties, especially older properties that have not undergone a reassessment (due to a change in ownership or significant improvements). For parcels identified as vacant or surface parking but do not have information on assessed land and improvement values, it would be reasonable to assume the ILV to be zero or very close to zero.

7. Age of structure

The age of a structure is useful in demonstrating that a site has a higher likelihood of redevelopment. New construction on the site indicates that a property owner is unlikely to invest in additional improvements or redevelopment on the site within the housing cycle. Approximately 85 percent of structures on opportunity sites are over 30 years old, with the average structure age on nonvacant sites being nearly 60 years old.

As shown on Table B-7, the City has a trend of redevelopment on parcels with existing structures as new as 30 years. Structure age of non-vacant sites is included on the Site Inventory. Therefore, this analysis uses 30 years (or constructed before 1993) as the threshold. For parcels with no structures (vacant or surface parking) are noted as meeting this factor.

8. Floor area ratio (FAR)

FAR values lower than what is permitted by the Zoning Ordinance indicate underutilization, especially in the downtown area or along high-density corridors. Developed sites with higher FAR are less likely to be redeveloped as the land and demolition costs would be high. The majority of the opportunity sites and the recent redevelopment projects, profiled in the Development Trends section below, are typically replaced one-story commercial uses, with FAR values of less than 1.0 and less than what is permitted by the respective zoning district. For this analysis we have established a FAR threshold of 0.90. This was determined through the City's desire of further development in the Downtown area as set forth in the Downtown Plan. The FAR values are included on the Site Inventory. The average FAR for the opportunity sites is 0.24.

Table B-7 Nonvacant Sites Analysis

Site Address	APN	Meet Sites Requirements (1, 2, or 3), or 2 criteria (4-7)	Vacant (1)	Surface Parking (2)	Vacant Buildings (3)	Single-Story Building (4)	ILR of <1.0 (5)	Year Built of >30 Years old (6)	FAR (7) <0.9
CALIFORNIA AVE	8474007940	YES	NO	YES	NO	YES	0	N/A	N/A
636 S SUNSET AVE	8474003057	YES	NO	NO	NO	YES	0.9	1978	0.01
584 S SUNSET AVENUE	8474003062	YES	NO	NO	NO	NO	0.78	2019	0.24
CALIFORNIA AVE	8474007939		NO	NO	NO	NO	0	N/A	N/A
PLAZA DRIVE	8474003073	YES	NO	NO	NO	NO	0.16	N/A	N/A
934 WEST COVINA PKWY	8475006053	YES	NO	NO	NO	YES	0.72	1959	0.04
666 SUNSET AVE	8474003008	YES	NO	NO	NO	YES	0.84	1958	0.43
WEST COVINA PKWY	8475002035	YES	NO	NO	YES	YES	0.24121	1991	0.90
950 LAKES DR	8474011050	YES	NO	NO	NO	YES	0.89465		0.65
110 CALIFORNIA AVE	8474007043	YES	YES	NO	YES	NO	0	N/A	N/A
656 SUNSET AVE	8474003009	YES	NO	NO	NO	YES	0.68	1958	0.10
610 SUNSET AVE	8474003064	YES	NO	NO	YES	YES	0.93	2000	0.28
WEST COVINA PKWY	8475002032	YES	NO	YES	NO	YES	0.02	1975	0.45
195 GLENDORA AVE	8474011051	YES	NO	NO	NO	YES		N/A	0.69
265 GLENDORA AVE	8474011040	YES	NO	NO	NO	YES	5	1996	0.52
421 GLENDORA AVE	8474009003	YES	NO	NO	NO	YES	0.84	1963	0.51
811 WEST COVINA PKWY	8474009005	YES	NO	NO	NO	YES	2.04	1973	0.25
401 GLENDORA AVE	8474009010	YES	NO	NO	NO	YES	0.39	1964	0.27
330 VINCENT AVE	8474009008	YES	NO	NO	NO	YES	0.47	1969	0.59
CAMERON AVE	8474002015	YES	NO	NO	NO	NO	1.1	1982	0.50
VINCENT AVE	8474009001	YES	NO	NO	NO	YES	0.49	1961	0.01
WEST COVINA PKWY	8474002013	YES	NO	NO	NO	YES	0.66	1960	0.19
WEST COVINA PKWY	8474002016	YES	NO	NO	NO	NO	4.33	1962	0.55
LAKES DR	8474011043	YES	NO	NO	NO	YES	1.12	2000	0.38
LAKES DR	8474011047	YES	NO	NO	NO	YES	2.89	2005	0.65
WEST COVINA PKWY	8474002005	YES	NO	NO	NO	YES	2.81	1995	0.64
WEST COVINA PKWY	8474002019	YES	NO	NO	NO	NO	0.76	1963	0.38
LAKES DR	8474011943	YES	NO	YES	NO	YES		1990	0.55
GLENDORA AVE	8476024013	YES	NO	NO	NO	YES	0.62	1963	0.14
GLENDORA AVE	8476024003	YES	NO	NO	NO	YES	1	1962	0.26
ORANGE AVE	8468007040	YES	NO	YES	NO	YES	0.04	1971	0.76
CAMERON AVE	8468016009	YES	NO	NO	NO	YES	0.63	1974	0.49
W CAMERON AVE	8468015032	YES	NO	NO	NO	YES	0	2011	0.02
VINCENT AVE	8475007030	YES	NO	NO	NO	YES	0.11	1970	0.13
GLENDORA AVE	8475007042	YES	NO	NO	NO	YES	0.35	1991	0.09
SUNSET AVE	8474002010	YES	NO	NO	NO	YES	0.61	1967	0.22
GLENDORA AVE	8475007028	YES	NO	NO	NO	YES	0.19	1963	0.05
GLENDORA AVE	8476008011	YES	NO	NO	NO	YES	0.59	1974	0.27
GLENDORA AVE	8476009036	YES	NO	NO	NO	YES	0.54	1956	0.23
GLENDORA AVE	8476012023	YES	NO	NO	NO	YES	1.11167		0.41
GLENDORA AVE	8476011040	YES	NO	NO	NO	NO	0.83	1965	N/A
GLENDORA AVE	8476012022	YES	NO	NO	NO	NO	0.7	1956	N/A
GLENDORA AVE	8476011044	YES	NO	NO	NO	YES	0.7	1956	0.62

Site Address	APN	Meet Sites Requirements (1, 2, or 3), or 2 criteria (4-7)	Vacant (1)	Surface Parking (2)	Vacant Buildings (3)	Single-Story Building (4)	ILR of <1.0 (5)	Year Built of >30 Years old (6)	FAR (7) <0.9
GLENDORA AVE	8476011043	YES	NO	NO	NO	NO	0	N/A	N/A
GLENDORA AVE	8476011039	YES	NO	NO	NO	NO	0.77	1961	N/A
GLENDORA AVE	8476022019	YES	NO	NO	NO	YES	0.86	1968	0.04
WEST COVINA PKWY	8474007037	YES	NO	NO	NO	NO	8.84	1974	N/A
PLAZA DRIVE	8474003084	YES	NO	NO	NO	YES		N/A	0.29
WEST COVINA PKWY	8474003018	YES	NO	NO	NO	YES	3.05	1975	0.24
GARVEY AVE S	8474007036	YES	NO	NO	NO	NO	0.16	1975	N/A
WEST COVINA PKWY	8474003061	YES	NO	NO	NO	YES	0.95	2000	0.42
ORANGE AVE	8474001022	YES	NO	NO	NO	YES			0.24
WEST COVINA PKWY	8474007041	YES	NO	NO	NO	NO	0.99	1993	N/A
WEST COVINA PKWY	8474003060	YES	NO	NO	NO	YES	0.96	1974	0.26
FASHION PLAZA	8474003085	YES	NO	NO	NO	YES	0.2454		0.22
WEST COVINA PKWY	8474001020	YES	NO	NO	NO	NO	0.13	1963	N/A
WEST COVINA PKWY	8474001016	YES	NO	NO	NO	NO	0.13	1963	0.38
W CAMERON AVE	8474001018	YES	NO	NO	NO	YES	0.13	1963	0.36
SUNSET AVE	8468016904	YES	NO	NO	NO	NO	0	N/A	N/A
MERCED AVE	8463002010	YES	NO	NO	NO	YES	0.72	1959	0.15
GARVEY AVE N	8453023018	YES	NO	NO	NO	YES	0.97	1998	0.31
ROWLAND AVE	8454014009	YES	NO	NO	NO	YES	0.88	1963	0.05
AZUSA AVE	8454014011	YES	NO	NO	NO	YES	0.45	1964	0.16
AZUSA AVE	8454016001	YES	NO	NO	NO	YES	0.2	1958	0.00
AZUSA AVE	8454016022	YES	NO	NO	NO	YES	0.57	1980	0.19
AZUSA AVE	8454016019	YES	NO	NO	NO	YES	0.88	1963	0.21
AZUSA AVE	8454016021	YES	NO	NO	NO	YES	0.75	1957	0.13
AZUSA AVE	8455014014	YES	NO	NO	NO	YES	0.11	1984	0.01
GARVEY AVE N	8458023020	YES	NO	NO	NO	YES	0.33	1956	0.24
GARVEY AVE N	8458025026	YES	NO	NO	NO	YES	0.36	1953	0.37
GARVEY AVE N	8458025022	YES	NO	NO	NO	YES	0.69	1990	0.11
HARBERT ST	8458025015	YES	NO	NO	NO	YES	0.35	1955	0.12
LANG AVE	8458025028	YES	NO	NO	NO	NO	0	N/A	N/A
PACIFIC AVE	8459027001	YES	NO	NO	NO	YES	0.84	2011	0.06
GLENDORA AVE	8469019018	YES	NO	NO	NO	NO	0.72	1974	N/A
AMAR RD	8743006046	YES	NO	NO	NO	YES	0.67	2007	0.30
GLENDORA AVE	8475010013	YES	NO	NO	NO	YES	0.15	1955	0.15
SERVICE AVE	8475010024	YES	NO	NO	NO	YES	0.47	1956	0.25
AZUSA AVE	8477001020	YES	NO	NO	NO	NO	0	2018	0.14
AZUSA AVE	8477001021	YES	NO	NO	NO	NO	0	N/A	N/A
AZUSA AVE	8490022038	YES	NO	NO	NO	YES	0.86	1967	0.17
AZUSA AVE	8490022035	YES	NO	NO	NO	NO	0.9	1992	N/A
AZUSA AVE	8490022034	YES	NO	NO	NO	NO	0.81	1992	N/A
GARVEY AVE S	8479001009	YES	NO	NO	NO	YES	0.13	1959	0.24
GARVEY AVE S	8480002049	YES	NO	NO	NO	NO	0	N/A	N/A
GARVEY AVE S	8480002026	YES	NO	YES	NO	YES	0.02	1991	0.05
GARVEY AVE S	8480002046	YES	NO	NO	NO	NO	0.93	1963	N/A
FRANCISQUITO AVE	8465001003	YES	NO	NO	NO	YES	0.18	1964	0.18
FRANCISQUITO AVE	8467001015	YES	NO	NO	NO	YES	0	1958	0.06
FRANCISQUITO AVE	8467001012	YES	NO	NO	NO	YES	0.23	1960	0.13
AZUSA AVE	8493040180	YES	NO	NO	NO	YES	0.68	1992	0.11

Site Address	APN	Meet Sites Requirements (1, 2, or 3), or 2 criteria (4-7)	Vacant (1)	Surface Parking (2)	Vacant Buildings (3)	Single-Story Building (4)	ILR of <1.0 (5)	Year Built of >30 Years old (6)	FAR (7) <0.9
VALLEY BLVD	8725017013	YES	NO	NO	NO	YES	0.68	1992	0.26
BADILLO ST	8437024011	YES	NO	NO	NO	YES	0.46	1979	0.28
SUNSET AVE	8470005004	YES	NO	NO	NO	NO	0.42	1979	N/A
GARVEY AVE S	8480002058	YES	NO	NO	NO	NO	0.65	1986	0.16
AZUSA AVE	8443003022	YES	NO	NO	NO	YES	0.8	1999	0.27
VINCENT AVE	8456019027	YES	NO	NO	NO	YES	0.33	1963	0.16
SUNSET AVE	8458003011	YES	NO	NO	NO	NO	0.67	1971	N/A
PUENTE AVE	8458003009	YES	NO	NO	NO	YES	0.29	1966	0.19
SUNSET AVE	8458003010	YES	NO	NO	NO	YES	0.07	1956	0.06
SUNSET AVE	8458018003	YES	NO	NO	NO	YES	0.18	1956	0.07
AZUSA AVE	8442018020	YES	NO	NO	NO	YES	0.65	1962	0.25
GARVEY AVE S	8468007043	YES	NO	NO	NO	NO	0.67	1990	N/A
MERCED AVE	8469005001	YES	NO	NO	NO	YES	0.59	1966	0.20
GLENDORA AVE	8469020014	YES	NO	NO	NO	NO	0.91	1975	N/A
GLENDORA AVE	8469020018	YES	NO	NO	NO	NO	0.53	2008	N/A
VINE AVE	8487017041	YES	NO	NO	NO	YES	0.48	1969	0.06
MERCED AVE	8488001008	YES	NO	NO	NO	NO	0.53	1980	N/A
VINE AVE	8488002001	YES	NO	NO	NO	YES	0.62	1980	0.24
MERCED AVE	8488001007	YES	NO	NO	NO	YES	0.39	1972	0.26
GLENDORA AVE	8488002004	YES	NO	NO	NO	YES	0.56	1951	0.18
GLENDORA AVE	8488002003	YES	NO	NO	NO	YES	0.33	1950	0.25
GLENDORA AVE	8488019030	YES	NO	NO	NO	YES	0.3	2016	0.12
GLENDORA AVE	8487017043	YES	NO	NO	NO	NO	0.9	2014	N/A
WORKMAN AVE	8454016006	YES	NO	NO	NO	YES	0.31	1957	0.26
AZUSA AVE	8454016013	YES	NO	NO	NO	NO	0.65	1956	0.20
GARVEY AVE N	8458023017	YES	NO	NO	NO	YES	0.59	1948	0.03
ROSEWAY ST	8469003010	YES	NO	NO	NO	NO	0	N/A	N/A
SUNSET AVE	8469003009	YES	NO	NO	NO	NO	0.85	1986	N/A
ROSEWAY ST	8469003011	YES	NO	NO	NO	NO	0	N/A	N/A
SUNSET AVE	8470005022	YES	NO	NO	NO	YES	0.66	1974	0.24
AZUSA AVE	8477002013	YES	NO	NO	NO	NO	0.64	2001	N/A
GLENDORA AVE	8469015002	YES	NO	NO	NO	NO	0.44	1959	N/A
GLENDORA AVE	8469015024	YES	NO	NO	NO	YES	0.12	1967	0.07
GLENDORA AVE	8469015028	YES	NO	NO	NO	YES	0.26	1971	0.11
MERCED AVE	8470032017	YES	NO	NO	NO	NO	0.98	1971	N/A
MERCED AVE	8470032016	YES	NO	NO	NO	NO	0.78	1964	N/A
GLENDORA AVE	8488002005	YES	NO	NO	NO	YES	0.43	1948	0.18
MERCED AVE	8488019022	YES	NO	NO	NO	YES	0.44	1979	0.15
GLENDORA AVE	8488019031	YES	NO	NO	NO	NO	0.86	1979	N/A
NOGALES ST	8733012030	YES	NO	NO	NO	NO	0.76	1986	N/A
NOGALES ST	8733012033	YES	NO	YES	NO	NO	0.13	1988	N/A
NOGALES ST	8734001048	YES	NO	NO	NO	NO	0	0	N/A
AMAR RD	8735004001	YES	NO	NO	NO	NO	0.27	1974	N/A
AMAR RD	8735004012	YES	NO	NO	NO	NO	0.82	1974	N/A
AZUSA AVE	8735004011	YES	NO	NO	NO	YES	0.9	2002	0.08
AMAR RD	8735004010	YES	NO	NO	NO	NO	0.76	1974	N/A
LARK ELLEN AVE	8434015033	YES	NO	NO	NO	NO	0.52	1960	N/A
EASTLAND CTR DR	8451012028	YES	NO	NO	NO	NO	1	1979	N/A
CITRUS ST	8451012016	YES	NO	NO	NO	YES	0.94	2008	0.11
GARVEY AVE N	8451016104	YES	NO	NO	NO	YES	0.98	1976	0.13
GARVEY AVE N	8451016105	YES	NO	NO	NO	YES	0.85	1977	0.12
GARVEY AVE N	8451016100	YES	NO	NO	NO	YES	0.41	1967	0.14
WORKMAN AVE	8453001010	YES	NO	NO	NO	NO	0.63	1959	N/A
WORKMAN AVE	8453001051	YES	NO	NO	NO	NO	0.81	1959	N/A
CITRUS ST	8453001047	YES	NO	NO	NO	NO	0.35	2002	N/A
CITRUS ST	8453015006	YES	NO	NO	NO	NO	0.53	1974	N/A
CITRUS ST	8453015034	YES	NO	NO	NO	NO	0.53	1978	N/A
GARVEY AVE N	8453015020	YES	NO	NO	NO	NO	0.05	N/A	N/A

Site Address	APN	Meet Sites Requirements (1, 2, or 3), or 2 criteria (4-7)	Vacant (1)	Surface Parking (2)	Vacant Buildings (3)	Single-Story Building (4)	ILR of <1.0 (5)	Year Built of >30 Years old (6)	FAR (7) <0.9
AZUSA AVE	8454018012	YES	NO	YES	NO	NO	0.01	N/A	N/A
GRAND AVE	8451015046	YES	NO	NO	NO	YES	0.22	1972	0.07
THELBORN ST	8454014010	YES	NO	NO	NO	YES	0.45	1963	0.05
AZUSA AVE	8454018013	YES	NO	NO	NO	YES	0.17	1969	0.02
AZUSA AVE	8455014018	YES	NO	NO	NO	NO	0.65	1981	N/A
AZUSA AVE	8455022023	YES	NO	NO	NO	NO	0.89	1979	N/A
GARVEY AVE N	8458025030	YES	NO	NO	NO	NO	0.67	1986	N/A
AZUSA AVE	8442018011	YES	NO	NO	NO	NO	0.89	1970	N/A
ROWLAND AVE	8442018012	YES	NO	NO	NO	NO	0.9	1986	N/A
AZUSA AVE	8442018014	YES	NO	NO	NO	NO	0.51	1973	N/A
AZUSA AVE	8442018024	YES	NO	NO	NO	NO	0.49	1973	N/A
GLENDORA AVE	8475010023	YES	NO	NO	NO	NO	0.78	1973	N/A
AZUSA AVE	8730004026	YES	NO	NO	NO	NO	0.83	1995	N/A
AZUSA AVE	8730004029	YES	NO	NO	NO	NO	0.3	1967	N/A
GARVEY AVE S	8480002047	YES	NO	NO	NO	NO	0.6	1973	N/A
AZUSA AVE	8735001024	YES	NO	NO	NO	YES	0.71	2007	0.09
AZUSA AVE	8735001027	YES	NO	NO	NO	YES	0.4	2008	0.09
AZUSA AVE	8735001028	YES	NO	NO	NO	YES	0.4	2008	0.09
AZUSA AVE	8735001031	YES	NO	NO	NO	YES	0.96	2007	0.05
AZUSA AVE	8735001025	YES	NO	NO	NO	NO	0.59	2008	N/A
AZUSA AVE	8735001026	YES	NO	NO	NO	NO	0.72	2008	N/A
CITRUS ST	8480016001	YES	NO	NO	NO	NO	0.15	1981	N/A
CITRUS ST	8480016002	YES	NO	NO	NO	NO	0.92	1965	N/A
GARVEY AVE S	8480001022	YES	NO	NO	NO	NO	0.83	1975	N/A
GARVEY AVE S	8480001030	YES	NO	NO	NO	NO	0.64	1964	N/A
GARVEY AVE S	8480001017	YES	NO	NO	NO	NO	0.67	1961	N/A
GARVEY AVE S	8480016021	YES	NO	NO	NO	YES	0.51	1986	0.03
VALLEY BLVD	8725001017	YES	NO	NO	NO	NO	0	N/A	N/A
SUNSET AVE	8458023026	YES	NO	NO	NO	NO	0.99	1985	N/A
AZUSA AVE	8442018016	YES	NO	NO	NO	NO	0.89	1974	N/A
AZUSA AVE	8443018020	YES	NO	NO	NO	NO	0	N/A	N/A
ECKERMAN AVE	8443020033	YES	NO	NO	NO	NO	0.7	1972	N/A
AZUSA AVE	8443020034	YES	NO	NO	NO	NO	0.85	1963	N/A
GLENDORA AVE	8469015029	YES	NO	NO	NO	NO	0.92	1981	N/A
GLENDORA AVE	8469015035	YES	NO	NO	NO	NO	0.93	1974	N/A
GLENDORA AVE	8469015034	YES	NO	NO	NO	NO	0.93	1974	N/A
CHRISTOPHER ST	8475007038	YES	NO	NO	NO	NO	0	2020	N/A
GLENDORA AVE	8475009018	YES	NO	NO	NO	NO	0.25	1977	N/A
GLENDORA AVE	8487017038	YES	NO	NO	NO	NO	0.83	1983	N/A
GLENDORA AVE	8488002024	YES	NO	NO	NO	NO	0.27	1965	N/A
AZUSA AVE	8443003018	YES	NO	NO	NO	NO	0.72	1999	N/A

B.6.1 Existing Uses

A comparison of a site's current use to the use for which it is zoned can also help identify underutilized properties. For example, a parcel currently occupied by a school or single-family home, yet zoned for high-density housing or high intensity mixed-use development, represents an opportunity for the property owner to convert the property to a higher value use. As shown in Section B.1.3, trends indicate a high likelihood of redevelopment on commercial uses and school sites. Out of the eight projects utilized to establish development trends, three were previously developed with commercial uses, three were previously developed with schools, and two were previously developed with single-family homes. All properties were zoned for higher intensity uses. The City identified sites with uses that align with these development trends in areas that are likely to experience development.

B.6.2 Site Inventory Affordability Assumptions

Based on the “default density” provisions of State law,⁸ sites of at least one-half acre zoned to allow multi-family or mixed-use development at 30 or more units per acre are deemed suitable for very low- and low-income housing, while sites allowing multi-family development at a density of 12 to 29 units per acre are considered suitable for moderate-income housing. Sites allowing residential development at less than 12 units per acre are assigned to the above-moderate income category. Small sites less than one-half acre in size are assigned to either the moderate or the above-moderate category pursuant to Government Code §65583.2(c)(2)(A).

At least 50 percent of the very low and low-income housing need shall be accommodated on sites designated for residential use and for which nonresidential uses or mixed uses are not permitted, except that a city or county may accommodate all of the very low and low-income housing need on sites designated for mixed use if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

B.7 Site Inventory

Each site listing includes the following items in the column heading order from left to right:

- Unique map identification number
- Assessor’s Parcel Number (APN)
- Address or nearest cross street
- Size in acres
- General Plan land use designation
- Zoning designation
- Description of existing uses
- Maximum Density
- Total number of units realistically assumed on the site by income category
- Total unit capacity on the site

Sites within the Downtown Plan area are listed on Table B-8 through Table B-10 and shown geographically on Figure B-3 through Figure B-12.

⁸ California Government Code §65583.2(c)(3)(B)(iv)

Table B-8 Opportunity Sites – Downtown

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Capacity	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
1	8474007940	CALIFORNIA AVE	2.97	C	GU	Parking Lot	20	15.00	0	13	31	45
2	8474003057	SUNSET AVE	2.10	C	GU	Stores	20	15.00	0	9	22	32
3	8474003062	GARVEY AVE S	2.38	C	GU	Restaurants, Cocktail Lounges	20	15.00	0	11	25	36
4	8474007939	CALIFORNIA AVE	3.43	C	GU	Shopping Centers (Regional)	20	15.00	0	15	36	51
5	8474003073	PLAZA DRIVE	0.54	C	GU	Commercial	20	15.00	0	0	8	8
6	8475006053	WEST COVINA PKWY	0.34	C	GU	Restaurants, Cocktail Lounges	20	15.00	0	0	5	5
7	8474003008	SUNSET AVE	0.42	C	GU	Stores	20	15.00	0	0	6	6
8	8475002035	WEST COVINA PKWY	0.57	C	GU	Shopping Centers (Neighborhood, community)	20	15.00	0	0	8	8
9	8474011050	LAKES DR	6.55	C	GU	Commercial	20	15.00	0	29	69	98
10	8474007043	CALIFORNIA AVE	0.15	C	GU	Commercial	20	15.00	0	1	2	2
11	8474003009	SUNSET AVE	0.64	C	GU	Stores	20	15.00	0	3	7	10
12	8474003064	SUNSET AVE	0.95	C	GU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	4	10	14
13	8475002032	WEST COVINA PKWY	0.26	C	GU	Parking Lots (Commercial Use Properties)	20	15.00	0	0	4	4
14	8474011051	GLENDORA AVE	2.33	NH	GU	Shopping Center	54	40.50	85	9	0	94
15	8474011040	GLENDORA AVE	4.10	NH	GU	Theaters	54	40.50	149	17	0	166
16	8474009003	GLENDORA AVE	0.47	NH	GU	Office Buildings	54	40.50	0	6	13	19
17	8474009005	WEST COVINA PKWY	0.14	NH	GU	Stores	54	40.50	0	0	6	6
18	8474009010	GLENDORA AVE	0.68	NH	GU	Banks Savings & Loan	54	40.50	25	3	0	28
19	8474009008	VINCENT AVE	0.33	NH	GU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	54	40.50	0	4	9	13

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Capacity	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
20	8474002014	CAMERON AVE	1.17	NH	GU	Homes For Aged & Others	54	40.50	43	5	0	47
21	8474002015	CAMERON AVE	5.57	NH	GU	Office Buildings	54	40.50	203	23	0	226
22	8474009001	VINCENT AVE	1.01	NH	GU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	54	40.50	37	4	0	41
23	8474002013	WEST COVINA PKWY	0.87	NH	GU	Professional Buildings	54	40.50	32	4	0	35
24	8474002016	WEST COVINA PKWY	1.56	NH	GU	Athletic & Amusement Facilities	54	40.50	57	6	0	63
25	8474011043	LAKES DR	0.39	NH	GU	Restaurants, Cocktail Lounges	54	40.50	0	5	11	16
26	8474011047	LAKES DR	0.72	NH	GU	Restaurants, Cocktail Lounges	54	40.50	26	3	0	29
27	8474002005	WEST COVINA PKWY	0.80	NH	GU	Professional Buildings	54	40.50	29	3	0	32
28	8474002019	WEST COVINA PKWY	1.53	NH	GU	Office Buildings	54	40.50	56	6	0	62
29	8474011943	LAKES DR	0.95	NH	GU	Parking Lots (Commercial Use Properties)	54	40.50	35	4	0	38
30	8476024013	GLENDORA AVE	2.25	NM	GU	Shopping Centers (Neighborhood, community)	20	15.00	0	10	24	34
31	8476024003	GLENDORA AVE	1.27	NM	GU	Stores	20	15.00	0	6	13	19
32	8468007040	ORANGE AVE	1.69	NM	GU	Parking Lots (Commercial Use Properties)	20	15.00	0	8	18	25
33	8468016009	CAMERON AVE	1.62	NM	GU	Office Buildings	20	15.00	0	7	17	24
34	8468015032	W CAMERON AVE	2.03	NM	GU	Office Buildings	20	15.00	0	9	21	30
35	8475007030	VINCENT AVE	0.21	NM	GU	Restaurants, Cocktail Lounges	20	15.00	0	0	3	3
36	8475007042	GLENDORA AVE	0.62	NM	GU	Restaurants, Cocktail Lounges	20	15.00	0	0	9	9
37	8474002010	SUNSET AVE	1.28	NM	GU	Professional Buildings	20	15.00	0	6	13	19

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Capacity	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
38	8475007028	GLENDORA AVE	0.33	NM	GU	Restaurants, Cocktail Lounges	20	15.00	0	0	5	5
39	8476008011	GLENDORA AVE	0.87	NM	GU	Professional Buildings	20	15.00	0	4	9	13
40	8476009036	GLENDORA AVE	0.35	NM	GU	Stores	20	15.00	0	0	5	5
41	8476011040	GLENDORA AVE	0.12	NM	GU	Office Buildings	20	15.00	0	0	2	2
42	8476012022	GLENDORA AVE	0.24	NM	GU	Store Combination	20	15.00	0	0	4	4
43	8476011044	GLENDORA AVE	0.26	NM	GU	Stores	20	15.00	0	0	4	4
44	8476011043	GLENDORA AVE	0.20	NM	GU	Commercial	20	15.00	0	0	3	3
45	8476011039	GLENDORA AVE	0.13	NM	GU	Professional Buildings	20	15.00	0	0	2	2
46	8476022019	GLENDORA AVE	0.61	NM	GU	Restaurants, Cocktail Lounges	20	15.00	0	3	6	9
47	8476012023	GLENDORA AVE	0.29	NM	GU	Commercial	20	15.00	0	0	4	4
General Urban Zone Total			58.29						777	240	434	1,448
48	8474007037	WEST COVINA PKWY	16.81	C	UC	Shopping Centers (Regional)	54	40.50	405	276	0	681
49	8474003084	PLAZA DRIVE	2.56	C	UC	Shopping Centers (Regional)	54	40.50	93	10	0	104
50	8474003018	WEST COVINA PKY	2.90	C	UC	Shopping Centers (Regional)	54	40.50	106	12	0	117
51	8474001020	WEST COVINA PKY	6.43	C	UC	Shopping Centers (Neighborhood, community)	54	40.50	234	26	0	260
52	8474001022	ORANGE AVE	2.90	C	UC	Hospitals	54	40.50	106	12	0	117
53	8474007036	GARVEY AVE S	0.55	C	UC	Shopping Centers (Regional)	54	40.50	20	2	0	22
54	8474003061	WEST COVINA PKWY	0.47	C	UC	Shopping Centers (Regional)	54	40.50	0	6	13	19
55	8474007041	WEST COVINA PKWY	2.43	C	UC	Shopping Centers (Regional)	54	40.50	89	10	0	98
56	8474003060	WEST COVINA PKWY	0.28	C	UC	Shopping Centers (Regional)	54	40.50	0	0	11	11

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Capacity	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
57	8474003085	FASHION PLAZA	15.13	C	UC	Shopping Center	54	40.50	405	208	0	613
58	8474001016	WEST COVINA PKWY	0.59	C	UC	Shopping Centers (Neighborhood, community)	54	40.50	22	2	0	24
59	8474001018	W CAMERON AVE	8.22	C	UC	Shopping Centers (Neighborhood, community)	54	40.50	300	33	0	333
Urban Center Zone Total			59.27						1,779	597	25	2,400
60	8468016904	SUNSET AVE	1.40	NM	UN	Government Parcel	20	15.00	0	6	15	21
Urban Neighborhood Total			1.40						0	6	15	21
Downtown Total			118.96						2,556	843	474	3,869

Table B-9 Opportunity Sites – Mixed Use Zones

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
62	8453023018	GARVEY AVE N	5.32	C	NMU	Shopping Centers (Neighborhood, community)	20	15.00	0	24	56	80
63	8454014009	ROWLAND AVE	0.30	C	NMU	Store Combination	20	15.00	0	0	5	5
64	8454014011	AZUSA AVE	2.60	C	NMU	Stores	20	15.00	0	12	27	39
65	8454016001	AZUSA AVE	0.45	C	NMU	Service Stations	20	15.00	0	2	5	7
66	8454016022	AZUSA AVE	0.29	C	NMU	Office Buildings	20	15.00	0	0	4	4
67	8454016019	AZUSA AVE	0.57	C	NMU	Stores	20	15.00	0	0	9	9
68	8454016021	AZUSA AVE	0.33	C	NMU	Restaurants, Cocktail Lounges	20	15.00	0	0	5	5
69	8455014014	AZUSA AVE	0.51	C	NMU	Service Stations	20	15.00	0	0	8	8
70	8458023020	GARVEY AVE N	0.77	C	NMU	Professional Buildings	20	15.00	0	3	8	12
71	8458025026	GARVEY AVE N	0.15	C	NMU	Office Buildings	20	15.00	0	0	2	2
72	8458025022	GARVEY AVE N	0.25	C	NMU	Stores	20	15.00	0	0	4	4
73	8458025015	HARBERT ST	0.44	C	NMU	Stores	20	15.00	0	0	7	7
74	8458025028	LANG AVE	0.39	C	NMU	Commercial	20	15.00	0	0	6	6
75	8459027001	PACIFIC AVE	0.56	C	NMU	Service Stations	20	15.00	0	0	8	8
76	8469019018	GLENDORA AVE	0.19	C	NMU	Office Buildings	20	15.00	0	0	3	3
77	8743006046	AMAR RD	0.49	C	NMU	Stores	20	15.00	0	0	7	7
78	8475010013	GLENDORA AVE	0.26	C	NMU	Professional Buildings	20	15.00	0	0	4	4
79	8475010024	SERVICE AVE	0.19	C	NMU	Government Parcel	20	15.00	0	0	3	3
80	8477001020	AZUSA AVE	0.71	C	NMU	Restaurants, Cocktail Lounges	20	15.00	0	0	11	11
81	8477001021	AZUSA AVE	0.68	C	NMU	Service Stations	20	15.00	0	0	10	10
82	8490022038	AZUSA AVE	0.32	C	NMU	Store Combination	20	15.00	0	0	5	5
83	8490022035	AZUSA AVE	0.37	C	NMU	Stores	20	15.00	0	0	6	6
84	8490022034	AZUSA AVE	0.13	C	NMU	Stores	20	15.00	0	0	2	2
85	8479001009	GARVEY AVE S	1.31	C	NMU	Restaurants, Cocktail Lounges	20	15.00	0	6	14	20
86	8480002049	GARVEY AVE S	0.37	C	NMU	Commercial	20	15.00	0	0	6	6
87	8480002026	GARVEY AVE S	0.37	C	NMU	Parking Lots (Commercial Use Properties)	20	15.00	0	0	6	6
88	8480002046	GARVEY AVE S	0.33	C	NMU	Office Buildings	20	15.00	0	0	5	5

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
89	8465001003	FRANCISQUITO AVE	0.12	C	NMU	Office Buildings	20	15.00	0	0	2	2
90	8467001015	FRANCISQUITO AVE	0.51	C	NMU	Stores	20	15.00	0	0	8	8
91	8467001012	FRANCISQUITO AVE	0.20	C	NMU	Restaurants, Cocktail Lounges	20	15.00	0	0	3	3
92	8493040180	AZUSA AVE	0.40	C	NMU	Shopping Centers (Neighborhood, community)	20	15.00	0	0	6	6
93	8725017013	VALLEY BLVD	0.22	C	NMU	Supermarkets	20	15.00	0	0	3	3
94	8437024011	BADILLO ST	1.59	C	NMU	Shopping Centers (Neighborhood, community)	20	15.00	0	7	17	24
95	8470005004	SUNSET AVE	0.47	C	NMU	Stores	20	15.00	0	0	7	7
96	8480002058	GARVEY AVE S	0.72	C	NMU	Office Buildings	20	15.00	0	0	11	11
97	8443003022	AZUSA AVE	1.40	C	NMU	Stores	20	15.00	0	6	15	21
98	8456019027	VINCENT AVE	0.65	NM	NMU	Service Stations	20	15.00	0	0	10	10
99	8458003011	SUNSET AVE	0.22	NM	NMU	Office Buildings	20	15.00	0	0	3	3
100	8458003009	PUENTE AVE	0.28	NM	NMU	Supermarkets	20	15.00	0	0	4	4
101	8458003010	SUNSET AVE	0.40	NM	NMU	Service Stations	20	15.00	0	0	6	6
102	8458018003	SUNSET AVE	0.38	NM	NMU	Service Stations	20	15.00	0	0	6	6
103	8442018020	AZUSA AVE	2.43	NM	NMU	Supermarkets	20	15.00	0	11	26	36
104	8468007043	GARVEY AVE S	0.79	NM	NMU	Office Buildings	20	15.00	0	4	8	12
105	8469005001	MERCED AVE	0.28	NM	NMU	Supermarkets	20	15.00	0	0	4	4
106	8469020014	GLENDORA AVE	0.21	NM	NMU	Office Buildings	20	15.00	0	0	3	3
107	8469020018	GLENDORA AVE	0.49	NM	NMU	Stores	20	15.00	0	0	7	7
108	8487017041	VINE AVE	0.33	NM	NMU	Stores	20	15.00	0	0	5	5
109	8488001008	MERCED AVE	0.21	NM	NMU	Professional Buildings	20	15.00	0	0	3	3
110	8488002001	VINE AVE	0.56	NM	NMU	Stores	20	15.00	0	0	8	8
111	8488001007	MERCED AVE	0.28	NM	NMU	Professional Buildings	20	15.00	0	0	4	4
112	8488002004	GLENDORA AVE	0.17	NM	NMU	Professional Buildings	20	15.00	0	0	3	3
113	8488002003	GLENDORA AVE	0.19	NM	NMU	Stores	20	15.00	0	0	3	3
114	8488019030	GLENDORA AVE	0.43	NM	NMU	Service Stations	20	15.00	0	0	6	6

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
115	8487017043	GLENDORA AVE	0.17	NM	NMU	Restaurants, Cocktail Lounges	20	15.00	0	0	3	3
NMU Total			32.75						0	75	416	491
116	8454016006	WORKMAN AVE	0.46	C	OPMU	Professional Buildings	20	15.00	0	2	5	7
117	8454016013	AZUSA AVE	0.85	C	OPMU	Clubs., Lodge Halls, Fraternal Organizations	20	15.00	0	4	9	13
118	8458023017	GARVEY AVE N	0.76	C	OPMU	Wholesale & Manufacturing Outlets	20	15.00	0	3	8	11
119	8469003010	ROSEWAY ST	0.21	C	OPMU	Commercial	20	15.00	0	1	2	3
120	8469003009	SUNSET AVE	0.22	C	OPMU	Professional Buildings	20	15.00	0	1	2	3
121	8469003011	ROSEWAY ST	0.21	C	OPMU	Commercial	20	15.00	0	1	2	3
122	8470005022	SUNSET AVE	2.08	C	OPMU	Professional Buildings	20	15.00	0	9	22	31
123	8477002013	AZUSA AVE	0.96	C	OPMU	Schools (Private)	20	15.00	0	4	10	14
124	8469015002	GLENDORA AVE	0.20	NM	OPMU	Office Buildings	20	15.00	0	1	2	3
125	8469015024	GLENDORA AVE	0.40	NM	OPMU	Restaurants, Cocktail Lounges	20	15.00	0	2	4	6
126	8469015028	GLENDORA AVE	1.94	NM	OPMU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	9	20	29
127	8470032017	MERCED AVE	0.80	NM	OPMU	Schools (Private)	20	15.00	0	4	8	12
128	8470032016	MERCED AVE	0.30	NM	OPMU	Professional Buildings	20	15.00	0	1	3	5
129	8488002005	GLENDORA AVE	0.17	NM	OPMU	Office Buildings	20	15.00	0	1	2	3
130	8488019022	MERCED AVE	0.56	NM	OPMU	Professional Buildings	20	15.00	0	3	6	8
131	8488019031	GLENDORA AVE	0.97	NM	OPMU	Office Buildings	20	15.00	0	4	10	15
OPMU Total			11.09						0	15.00	116	166
140	8451012028	EASTLAND CTR DR	1.12	C	RMU	Shopping Centers (Regional)	20	15.00	0	5	12	17
141	8451012016	CITRUS ST	0.59	C	RMU	Service Stations	20	15.00	0	3	6	9

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
142	8451016104	GARVEY AVE N	1.65	C	RMU	Restaurants, Cocktail Lounges	20	15.00	0	7	17	25
143	8451016105	GARVEY AVE N	1.78	C	RMU	Restaurants, Cocktail Lounges	20	15.00	0	8	19	27
144	8451016100	GARVEY AVE N	1.65	C	RMU	Restaurants, Cocktail Lounges	20	15.00	0	7	17	25
RMU Total			6.79						0	31	71	102
145	8453001010	WORKMAN AVE	0.64	C	SMU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	3	7	10
146	8453001051	WORKMAN AVE	0.13	C	SMU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	0	2	2
147	8453001047	CITRUS ST	0.37	C	SMU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	0	6	6
148	8453015006	CITRUS ST	0.39	C	SMU	Stores	20	15.00	0	0	6	6
149	8453015034	CITRUS ST	0.45	C	SMU	Restaurants, Cocktail Lounges	20	15.00	0	0	7	7
150	8453015020	GARVEY AVE N	3.02	C	SMU	Commercial	20	15.00	0	14	32	45
151	8454018012	AZUSA AVE	2.02	C	SMU	Parking Lots (Commercial Use Properties)	20	15.00	0	9	21	30
152	8451015046	GRAND AVE	0.66	C	SMU	Service Stations	20	15.00	0	3	7	10
153	8454014010	THELBORN ST	0.87	C	SMU	Professional Buildings	20	15.00	0	4	9	13
154	8454018013	AZUSA AVE	3.69	C	SMU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	17	39	55
155	8455014018	AZUSA AVE	0.18	C	SMU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	0	3	3
156	8455022023	AZUSA AVE	1.09	C	SMU	Stores	20	15.00	0	5	11	16
157	8458025030	GARVEY AVE N	0.94	C	SMU	Hotel & Motels	20	15.00	0	4	10	14
158	8442018011	AZUSA AVE	0.75	C	SMU	Restaurants, Cocktail Lounges	20	15.00	0	3	8	11

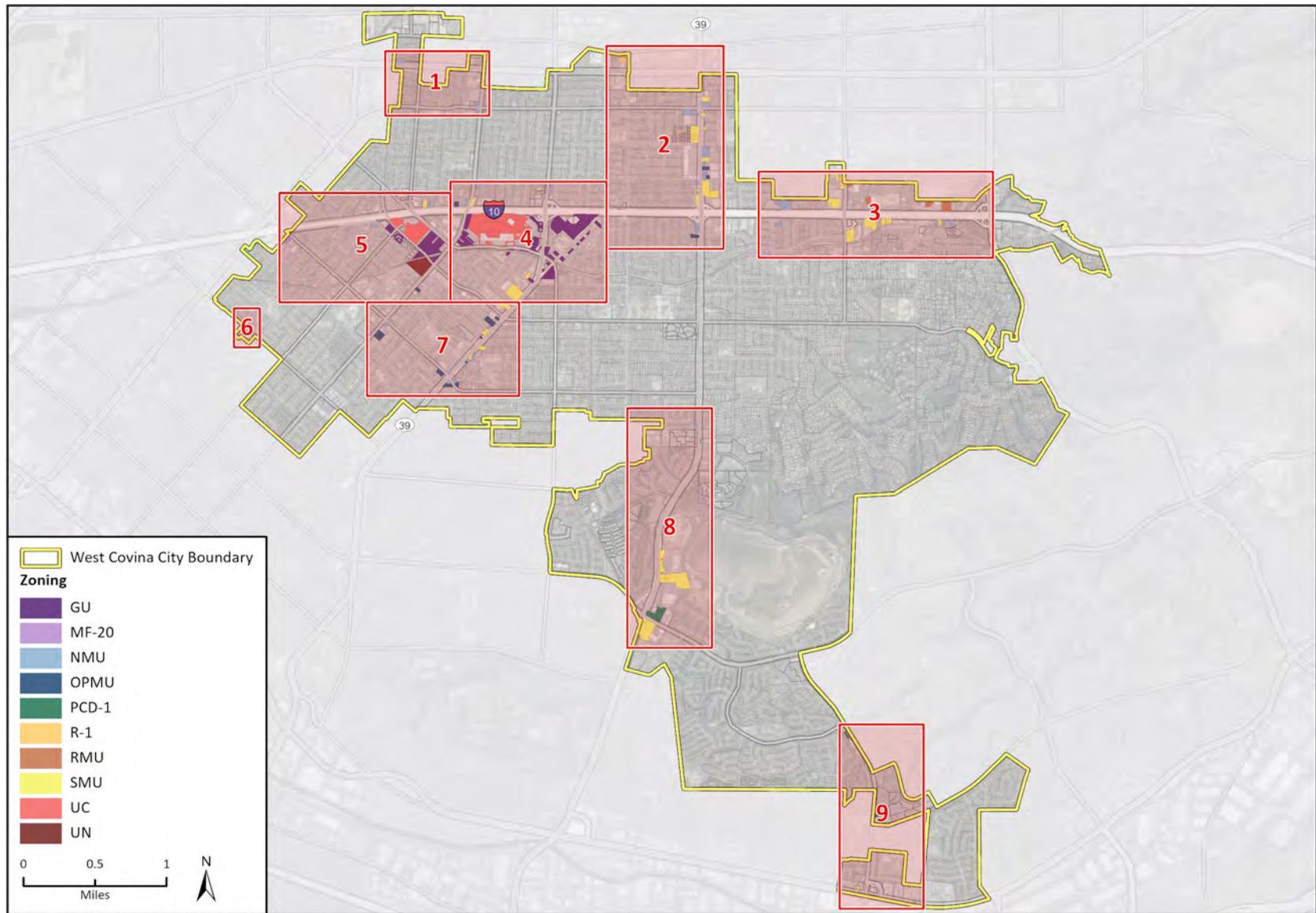
Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
159	8442018012	ROWLAND AVE	0.27	C	SMU	Office Buildings	20	15.00	0	1	3	4
160	8442018014	AZUSA AVE	0.59	C	SMU	Stores	20	15.00	0	3	6	9
161	8442018024	AZUSA AVE	0.73	C	SMU	Stores	20	15.00	0	3	8	11
162	8475010023	GLENDORA AVE	2.25	C	SMU	Stores	20	15.00	0	10	24	34
163	8730004026	AZUSA AVE	0.45	C	SMU	Stores	20	15.00	0	0	7	7
164	8730004029	AZUSA AVE	7.27	C	SMU	Shopping Centers (Regional)	20	15.00	0	33	76	109
165	8480002047	GARVEY AVE S	0.57	C	SMU	Warehousing, Distribution, Storage	20	15.00	0	0	9	9
166	8735001024	AZUSA AVE	0.46	C	SMU	Shopping Centers (Neighborhood, community)	20	15.00	0	0	7	7
167	8735001027	AZUSA AVE	1.43	C	SMU	Shopping Centers (Neighborhood, community)	20	15.00	0	6	15	21
168	8735001028	AZUSA AVE	1.48	C	SMU	Shopping Centers (Neighborhood, community)	20	15.00	0	7	16	22
169	8735001031	AZUSA AVE	8.93	C	SMU	Shopping Centers (Neighborhood, community)	20	15.00	0	40	94	134
170	8735001025	AZUSA AVE	0.79	C	SMU	Shopping Centers (Neighborhood, community)	20	15.00	0	4	8	12
171	8735001026	AZUSA AVE	0.79	C	SMU	Shopping Centers (Neighborhood, community)	20	15.00	0	4	8	12
172	8480016001	CITRUS ST	0.40	C	SMU	Service Stations	20	15.00	0	0	6	6
173	8480016002	CITRUS ST	2.61	C	SMU	Stores	20	15.00	0	12	27	39
174	8480001022	GARVEY AVE S	0.93	C	SMU	Hotel & Motels	20	15.00	0	4	10	14
175	8480001030	GARVEY AVE S	0.52	C	SMU	Stores	20	15.00	0	0	8	8
176	8480001017	GARVEY AVE S	0.37	C	SMU	Office Buildings	20	15.00	0	0	6	6
177	8480016021	GARVEY AVE S	3.94	C	SMU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	18	41	59
178	8725001017	VALLEY BLVD	0.38	C	SMU	Commercial	20	15.00	0	2	4	6

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
179	8458023026	SUNSET AVE	0.64	C	SMU	Stores	20	15.00	0	3	7	10
180	8442018016	AZUSA AVE	2.13	NM	SMU	Stores	20	15.00	0	10	22	32
181	8443018020	AZUSA AVE	0.21	NM	SMU	Commercial	20	15.00	0	0	3	3
182	8443020033	ECKERMAN AVE	0.22	NM	SMU	Office Buildings	20	15.00	0	0	3	3
183	8443020034	AZUSA AVE	0.24	NM	SMU	Store Combination	20	15.00	0	0	4	4
184	8469015029	GLENDORA AVE	0.47	NM	SMU	Stores	20	15.00	0	0	7	7
185	8469015035	GLENDORA AVE	0.17	NM	SMU	Stores	20	15.00	0	0	3	3
186	8469015034	GLENDORA AVE	0.17	NM	SMU	Stores	20	15.00	0	0	3	3
187	8475007038	CHRISTOPHER ST	0.72	NM	SMU	Office Buildings	20	15.00	0	0	11	11
188	8475009018	GLENDORA AVE	5.22	NM	SMU	Bowling Alleys	20	15.00	0	23	55	78
189	8487017038	GLENDORA AVE	0.83	NM	SMU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	0	12	12
190	8488002024	GLENDORA AVE	0.29	NM	SMU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	20	15.00	0	0	4	4
191	8443003018	AZUSA AVE	1.18	NM	SMU	Stores	20	15.00	0	5	12	18
SMU Total			62.85						0	15.00	694	943
Mixed-Use Total			113.48						0	405	1,297	1,702

Table B-10 Opportunity Sites – Other Uses

Map ID	APN	Street Address	Acres	General Plan	Zoning	Existing Use	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
61	8463002010	MERCED AVE	1.43	C	MF-20	Clubs., Lodge Halls, Fraternal Organizations	20	15.00	0	6	15	21
MF-20 TOTAL			1.43						0	6	15	21
132	8733012030	NOGALES ST	0.61	C	PCD-1	Schools (Private)	20	15.00	0	3	6	9
133	8733012033	NOGALES ST	0.19	C	PCD-1	Parking Lots (Commercial Use Properties)	20	15.00	0	1	2	3
134	8734001048	NOGALES ST	0.41	C	PCD-1	Shopping Centers (Neighborhood, community)	20	15.00	0	0	6	6
135	8735004001	AMAR RD	1.93	C	PCD-1	Shopping Centers (Neighborhood, community)	20	15.00	0	9	20	29
136	8735004012	AMAR RD	0.60	C	PCD-1	Shopping Centers (Regional)	20	15.00	0	3	6	9
137	8735004011	AZUSA AVE	0.86	C	PCD-1	Service Stations	20	15.00	0	4	9	13
138	8735004010	AMAR RD	1.99	C	PCD-1	Shopping Centers (Regional)	20	15.00	0	9	21	30
PCP-1 TOTAL			6.59						0	28	71	99
139	8434015033	LARK ELLEN AVE	1.00	C	R-1	Professional Buildings	7.3	5.48	0	0	5	5
R-1 TOTAL			1.00						0	0	5	5
Other Uses Total			9.02						0	34	91	125

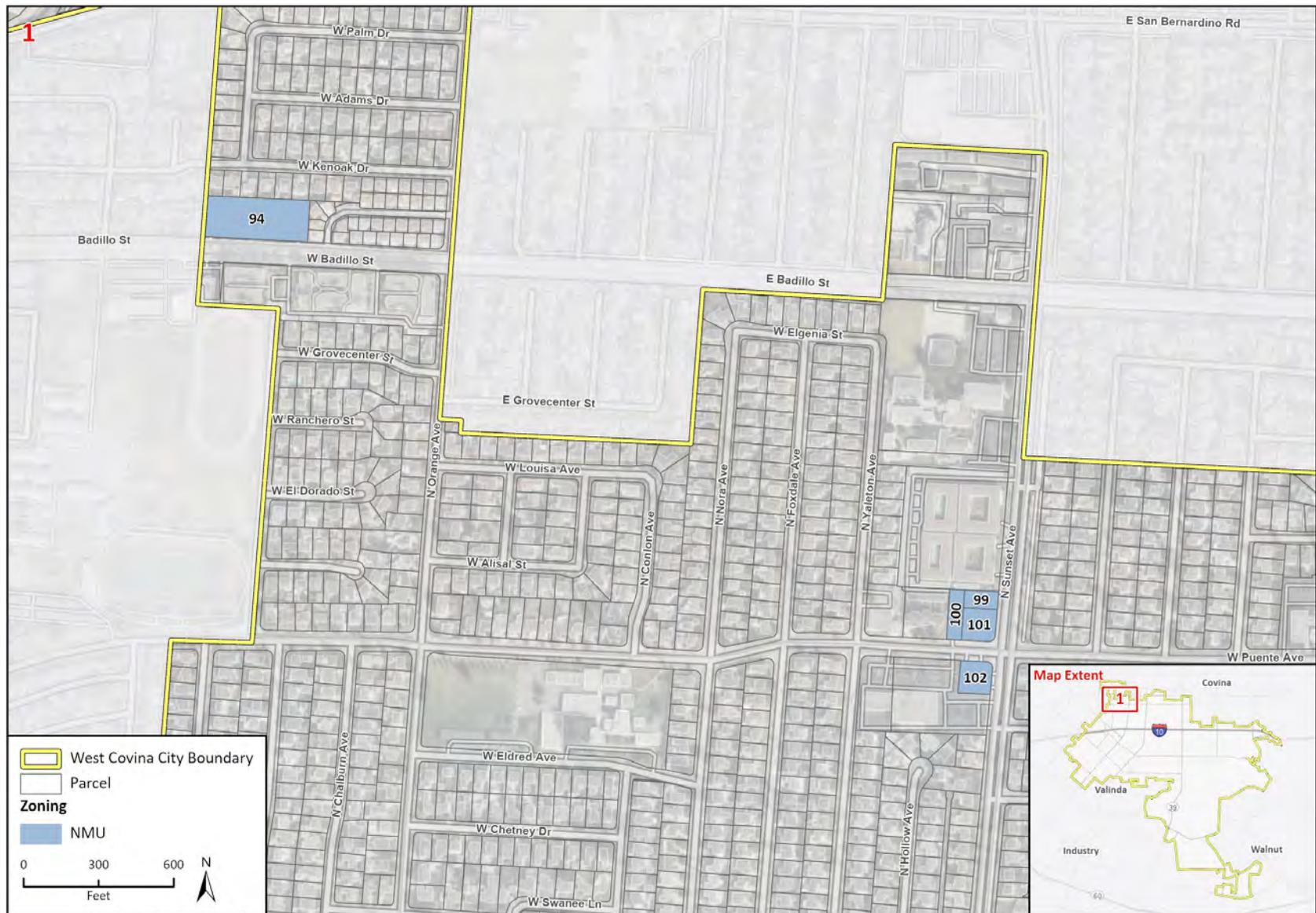
Figure B-3 Site Inventory Overview



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23-14758 HE_AFFH
Fig X Sites Inventory - Areas Overview

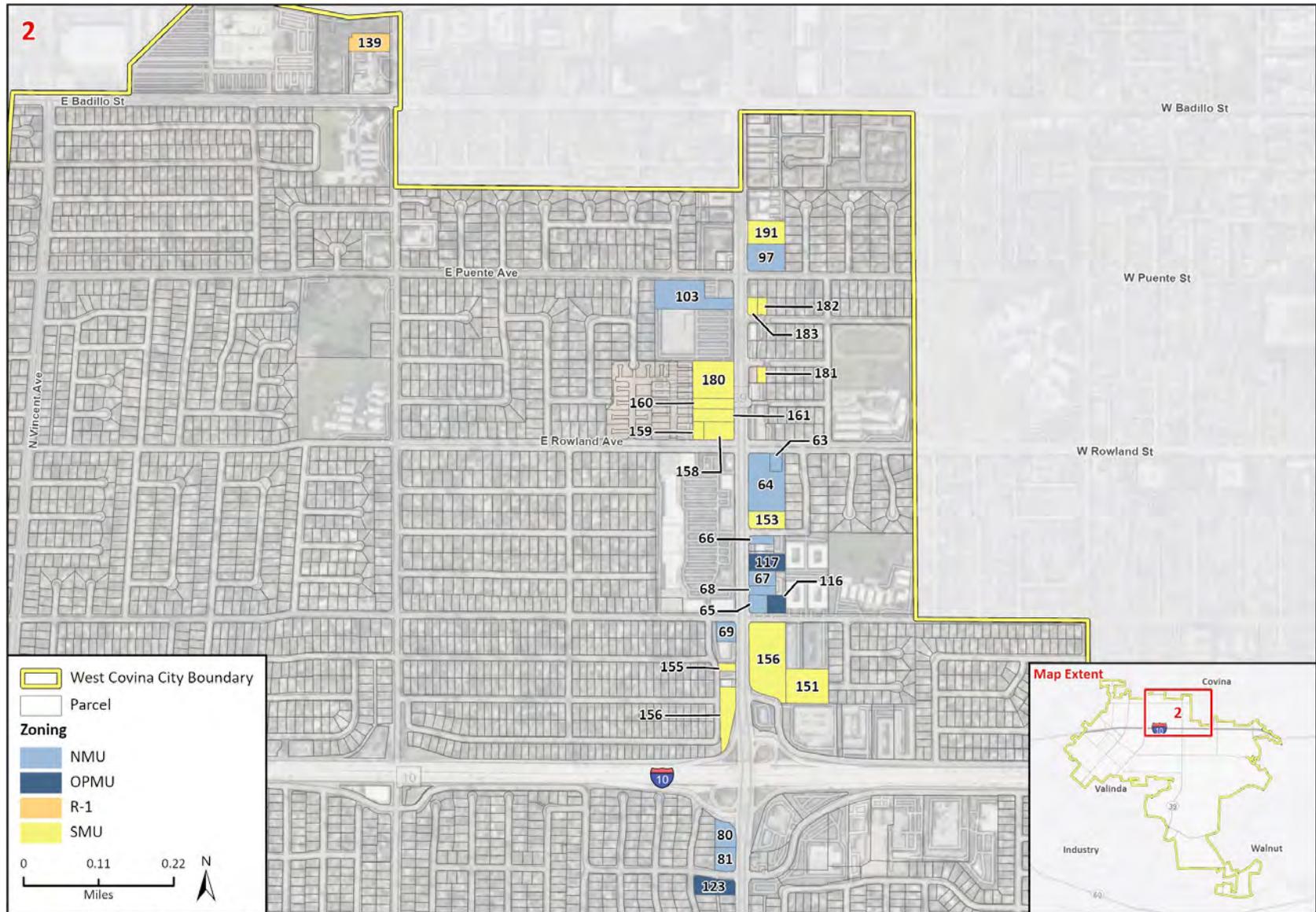
Figure B-4 Site Inventory – Area 1



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23-14755 HE_Affix
 Fig K Sites Inventory - Area 1

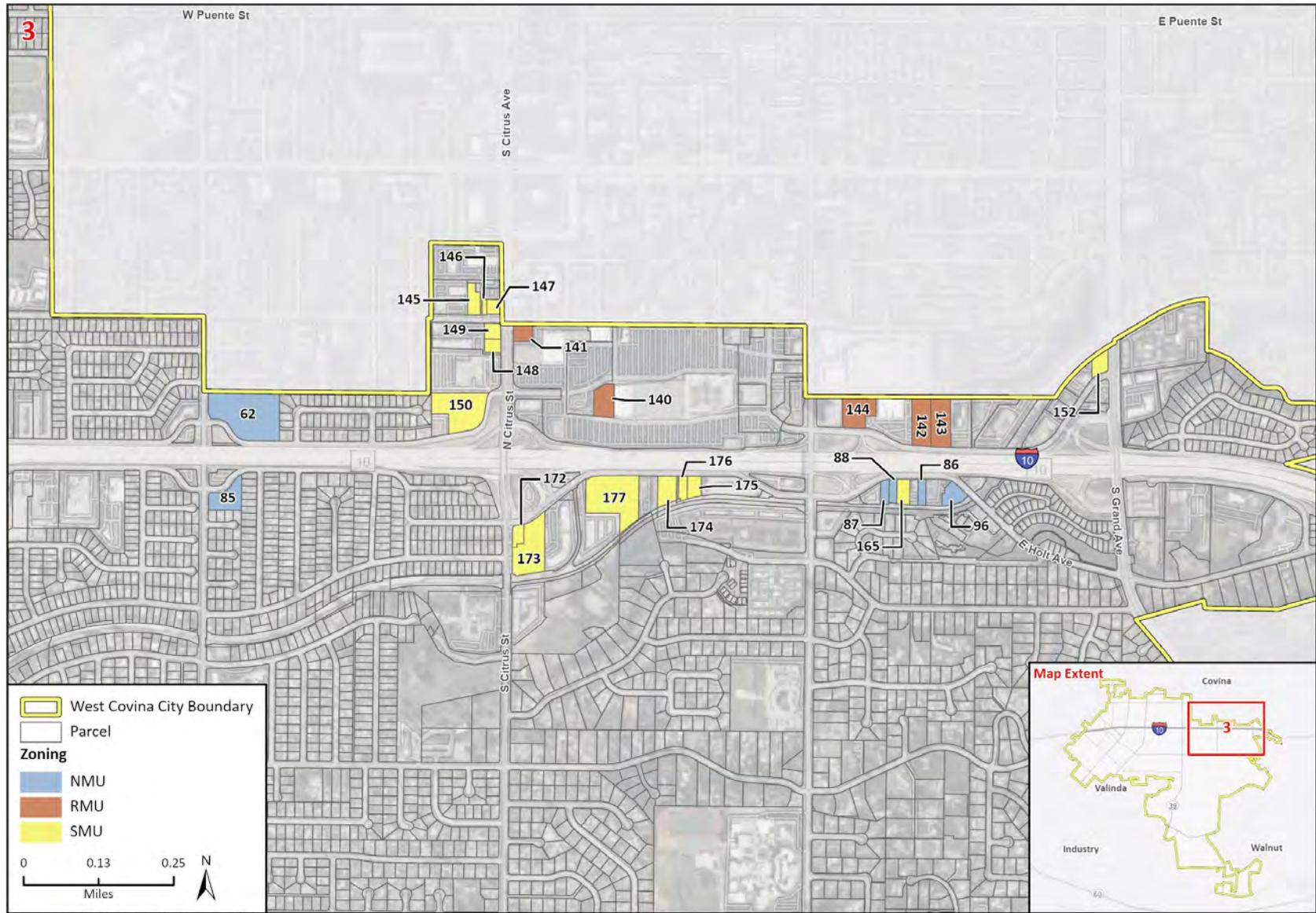
Figure B-5 Site Inventory – Area 2



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23-14755 HE_AFFH
 Fig X Sites Inventory - Area 2

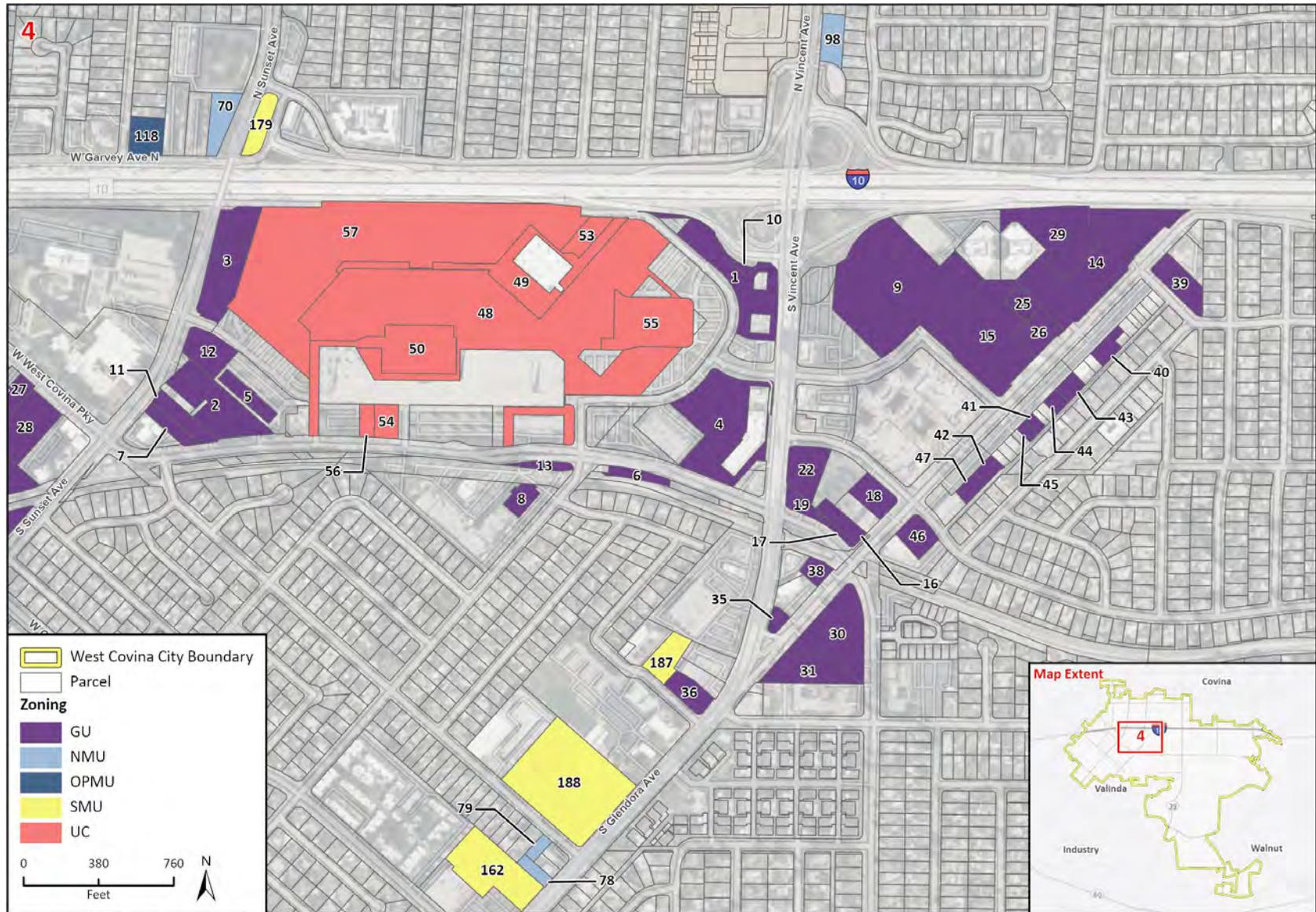
Figure B-6 Site Inventory – Area 3



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23-14755 HE_A111
 Fig X Sites Inventory - Area 3

Figure B-7 Site Inventory – Area 4



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23-14755 HE_A111
 Fig X Sites Inventory - Area 4

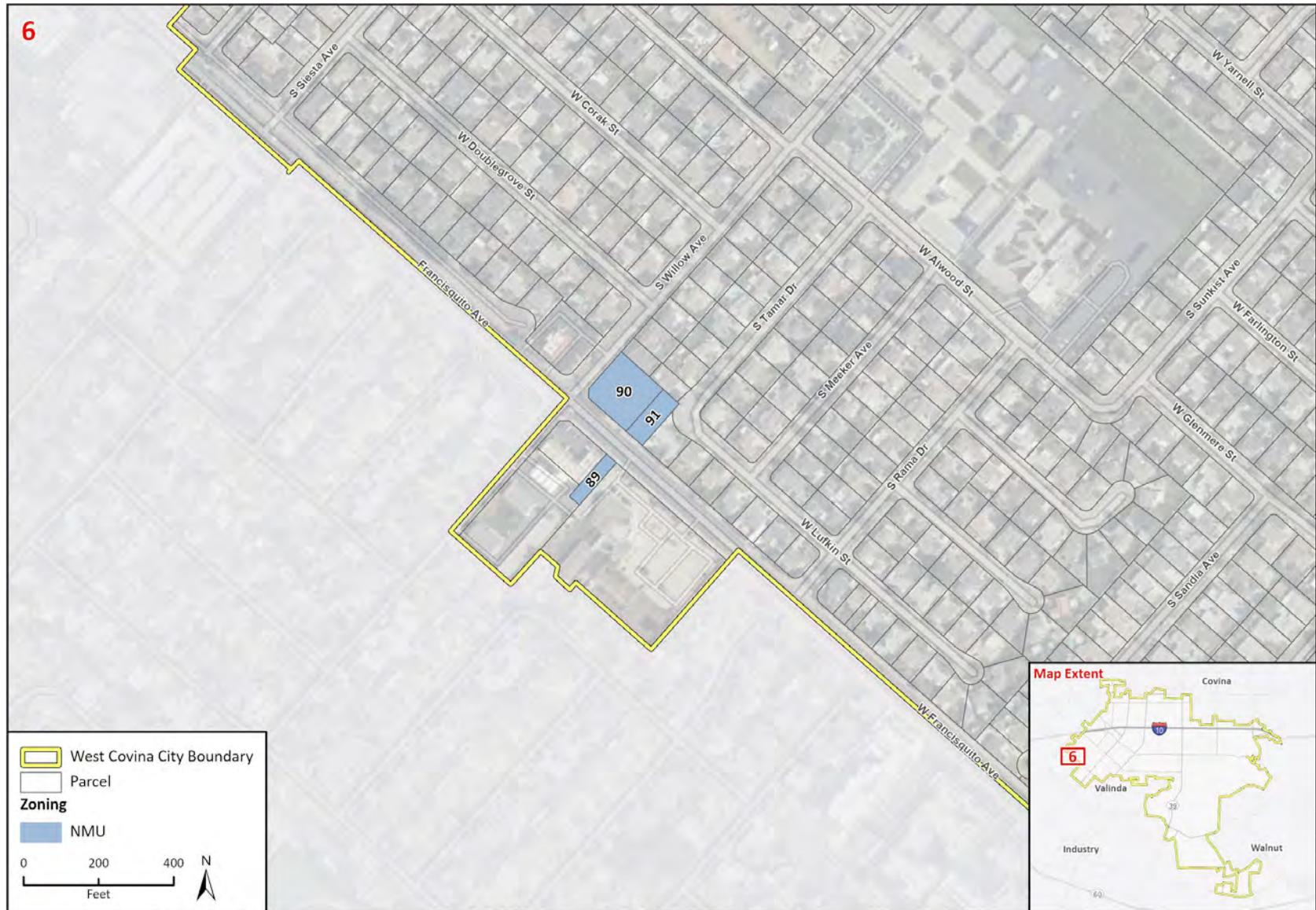
Figure B-8 Site Inventory – Area 5



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23-14755-FE_APP
 Fig B Sites Inventory - Area 5

Figure B-9 Site Inventory – Area 6



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23-14755 HE_A111
 Fig X Sites Inventory - Area 6

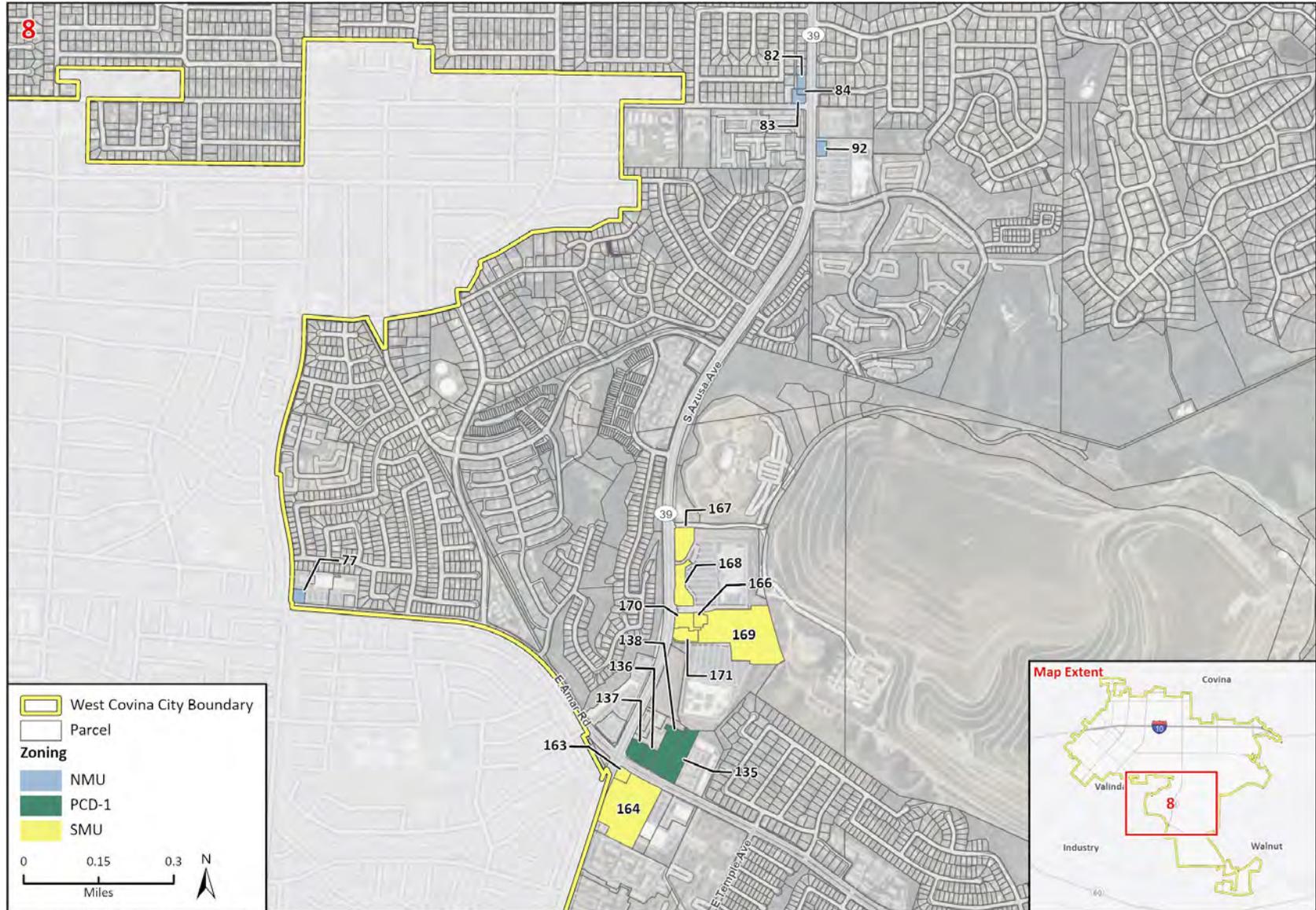
Figure B-10 Site Inventory – Area 7



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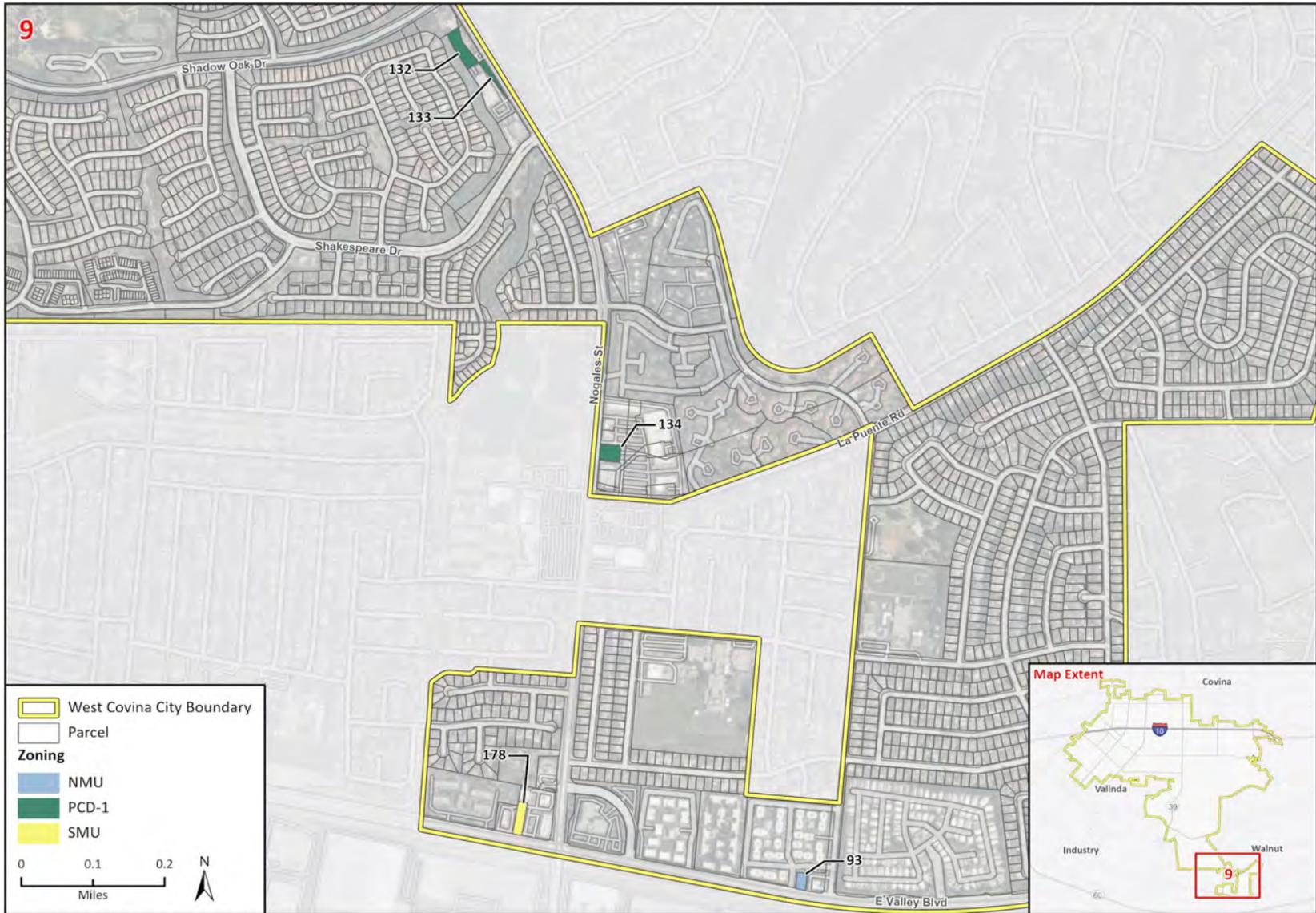
23-04750-PL-0111
Fig. B Site Inventory - Area 7

Figure B-11 Site Inventory – Area 8



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Figure B-12 Site Inventory – Area 9



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23-14756 HE_APP11
 Fig X Sites Inventory - Area 9

Table B-11 Sites Used in Previous Planning Periods

Address	APN	Acres	Land Use	Zoning	Existing Use	Total units
GLENDORA AVE	8474009010	0.68	NH	GU	Banks Savings & Loan	28
CAMERON AVE	8474002014	1.17	NH	GU	Homes For Aged & Others	47
CAMERON AVE	8474002015	5.57	NH	GU	Office Buildings	226
VINCENT AVE	8474009001	1.01	NH	GU	Auto, Recreation EQPT, Construction EQPT, Sales & Service	41
WEST COVINA PKWY	8474002013	0.87	NH	GU	Professional Buildings	35
WEST COVINA PKWY	8474002016	1.56	NH	GU	Athletic & Amusement Facilities	63
LAKES DR	8474011047	0.72	NH	GU	Restaurants, Cocktail Lounges	29
WEST COVINA PKWY	8474002005	0.80	NH	GU	Professional Buildings	32
WEST COVINA PKWY	8474002019	1.53	NH	GU	Office Buildings	62
LAKES DR	8474011943	0.95	NH	GU	Parking Lots (Commercial Use Properties)	38
Total		15.84				601

City-Owned Sites

While the vast majority of identified opportunity sites are privately owned, four sites owned by the City have been identified as having high redevelopment potential and have been included on the Site Inventory. These sites are currently utilized by parking and commercial uses, are considered highly developable, and are currently zoned to support high-density and mixed-use development, specifically in the General Urban Zone in the Downtown.

The City will follow all requirements of the Surplus Land Act, Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5, including holding a public hearing designating the properties as “surplus properties” under California Law. Table B-12 lists the City-owned sites identified for redevelopment. In the event that these sites do not develop in this time frame, the City will identify alternative sites to accommodate the RHNA.

Table B-12 City-Owned Sites

Address	APN	Acres	Land Use	Zoning	Existing Use	Total units
CALIFORNIA AVE	8474007940	2.97	C	GU	Parking Lot	45
CALIFORNIA AVE	8474007939	3.43	C	GU	Shopping Centers (Regional)	51
LAKES DR	8474011943	0.95	NH	GU	Parking Lots (Commercial Use Properties)	38
SUNSET AVE	8468016904	1.40	NM	UN	Government Parcel	21

Large Sites for Lower-Income Units

Government Code Section 65583.2 establishes that sites between 0.5 and 10 acres in size which are zoned for residential development at greater than 30 units per acre are suitable for lower-income projects. Very small parcels, even when zoned for high densities, may not facilitate the scale of development required to access competitive funding resources. No standalone parcels smaller than 0.5 acres include lower-income units. Conversely, typically lower-resource affordable housing developers may be unable to finance the scale of

project necessitated by very large parcels. The Site Inventory includes two instances of lots greater than 10-acres. These sites only assume low income up to 10 acres of the site, because of the assumption that these sites will be parceled out.

There are two sites in the site inventory that are above 10-acres. These sites are located in the Plaza West Covina shopping mall which was selected as priority redevelopment in the Downtown Plan. These sites can accommodate 810 lower-income units and 484 moderate-income units, with only 10 out of the total acres being allocated for lower-income.

Adequacy of Residential Site Inventory in Meeting RHNA

The Site Inventory identifies 2,590 lower-income units, 1,284 moderate-income units, and 1,865 above moderate-income units on 192 sites.

Of the identified sites, majority are located on sites currently used as commercial/office space. The Site Inventory includes a surplus of 316 lower-income units, allowing a 14 percent buffer for this income category above the RHNA requirement as well as a surplus of 426 moderate-income for a 50 percent buffer, and a surplus of 358 above moderate-income for a 24 percent buffer. The summary of the residential Site Inventory is presented in Table B-13.

Table B-13 Adequacy of Residential Site Inventory

	Lower Income	Moderate Income	Above Moderate Income	Total
City’s Share of RHNA	2,503	865	1,978	5,346
Planned and Approved Units	0	27	403	430
ADUs Anticipated	299	7	92	328
Remaining RHNA	2,274	831	1,483	4,588
General Urban Zone	776	239	436	1,451
Urban Center Zone	1,779	597	25	2,400
Urban Neighborhood Zone	0	6	15	21
MF-20	0	6	15	21
NMU	0	75	416	491
OPMU	0	50	116	166
PCP-1	0	28	71	99
R-1	0	0	5	5
RMU	0	31	71	102
SMU	0	249	694	943
Total Units on Sites	2,555	1,280	1,865	5,700
Total Unit Surplus	281	449	382	1,112
Percent Buffer over Remaining RHNA	12%	54%	26%	24%

B.7.1 Availability of Infrastructure

Adequate water, wastewater and dry utilities are available to serve the sites identified for potential development during the planning period.

B.7.2 Environmental Constraints

Although there are a variety of environmental issues (e.g., geological conditions, flood hazards) that affect development, these issues are not expected to preclude development of identified sites during the planning period.

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Appendix C

Public Participation

Public participation is an important component of the Housing Element update. Government Code §65583(c)(8) states that “The local government shall make diligent effort to achieve public participation of all the economic segments of the community in the development of the housing element, and the program shall describe this effort.” Public participation played an important role in the formulation and refinement of the City’s housing goals and policies and in the development of a Land Use Plan that determines the extent and density of future residential development in the community.

To ensure that the interests of lower-income households and persons with special needs were represented, upon initiation of the Housing Element update process the City prepared an updated list of stakeholders that included affordable housing developers, housing advocates, organizations serving the needs of low-income households and persons with special needs (see Table C-1). In addition, to ensure access for non-English speakers, the City has bilingual staff (Spanish and English) and can provide translation services upon request. The City website also includes a feature that enables viewers to translate the content into many different languages.

City residents and other interested parties were given many opportunities to identify housing issues of concern, recommend strategies, review the draft Housing Element, and provide recommendations to decision-makers. A specific Housing Element web page on the City’s Planning Division website was established to provide interested persons with update information including meeting notices, agendas, staff reports, Frequently Asked Questions (provided below) and other reference materials. A housing survey was also conducted online(see results below).

The following public meetings were conducted regarding the Housing Element update:

May 20, 2021	Public Workshop
October 27, 2021	Town Hall meeting
February 8, 2022	Planning Commission meeting
March 1, 2022	City Council meeting
May 24, 2022	Town Hall meeting
October 11, 2022	Planning Commission public hearing
November 15, 2022	City Council public hearing

Prior to each public meeting, notices were posted on the City’s website and also sent directly to each organization and person on the stakeholder list either by email or U.S. mail, or both. Notification was also published in the local newspaper in advance of the public hearings. Copies of the draft Housing Element were made available for review at City Hall and were posted on the City’s website, and notices were sent directly to housing interest groups and organizations that serve the City’s special needs populations (see Table C-1).

Table C-1 Housing Element Stakeholder Groups

Organization	Address	City
Housing Authority of Los Angeles County	700 West Main Street	Alhambra
Baldwin Park Housing Authority	14403 Pacific Avenue	Baldwin Park
San Gabriel/Pomona Regional Center	761 Corporate Center Dr	Pomona
Southern California Housing Rights Center	520 S. Virgil Avenue, Suite 400	Los Angeles
Human Services Association	6800 Florence Ave.	Bell Gardens
L.A. County Public Social Services	12860 Crossroads Parkway South	Industry
Lamp Community Homeless Drop In Ctr	627 San Julian Street	Los Angeles
Los Angeles Mission	303 East 5 th Street	Los Angeles
TELACU Development Corporation	5400 E Olympic Blvd,	Commerce
Habitat for Humanity	2111 Bonita Avenue	La Verne
Mercy Housing California	1500 S. Grand Avenue, Suite 100	Los Angeles
BRIDGE Housing Corporation	19200 Von Karmen Avenue	Irvine
LINC Housing	110 Pine Avenue, Suite 500	Long Beach
So. Calif. Association of Nonprofit Housing	501 Shatto Place, Suite 403	Los Angeles
Abode Communities	701 East 3 rd Street, Suite 400	Los Angeles
California Housing Partnership Corporation	800 S. Figueroa Street, Suite 760	Los Angeles
Shelter Partnership	523 W. 6 th Street #616	Los Angeles
San Gabriel Valley YMCA – WINGS Shelter	943 N. Grand Avenue	Covina
American Red Cross/San Gabriel Valley	1838 E. Workman Avenue	West Covina
Salvation Army	180 East Ocean Blvd., Suite 500	Long Beach
Assistance League/Pomona Valley	655 N. Palomares Street	Pomona
Catholic Charities/Brother Miguel Center	315 N. Park Avenue	Pomona
Catholic Charities/West Covina	415 Glendora Avenue, Suite F	West Covina
Chinatown Service Center	767 N. Hill Street, Suite 400	Los Angeles
Cold Weather Shelter	P.O. Box 76	San Gabriel
Covina Area Emergency Aid	534 N. Barranca Avenue	Covina
Dellhaven Community Center	15135 Fairgrove Avenue	La Puente
East San Gabriel Valley Coalition for the Homeless	1345 Turnbull Canyon Road	Hacienda Heights
Elizabeth House	P.O. Box 94077	Pasadena
Filipino American Service Group	135 N. Park View Street	Los Angeles
Food Finders	3434 Atlantic Avenue	Long Beach
Information Line/Los Angeles	P.O. Box 726	San Gabriel
WIC Program	12781 Schabarum Avenue	Irwindale
Love, Inc/World Vision	P.O. Box 3505	Covina
Volunteers of America	1760 W Cameron Ave	West Covina
Assistance League of Covina Valley	636 E San Bernardino Road	Covina
Action Food Pantry	2110 W Francisquito Avenue	West Covina
Shepherd’s Pantry	1418 Arrow Hwy	Irwindale
Inland Valley Hope Partners	1553 N. Park Avenue	Pomona
Citrus Valley Health Foundation	1115 S. Sunset Avenue	West Covina
Low Income Investment Fund	800 S. Figueroa Street, Suite 1800	Los Angeles
Santa Anita Family Services	206 E. Las Tunas, Suite 12	San Gabriel
A Community of Friends	3701 Wilshire Blvd, Suite 700	Los Angeles
Beyond Shelter	340 North Madison Avenue	Los Angeles
House of Ruth	P.O. Box 459	Claremont
Brookhollow Apartments	2600 S. Azusa Avenue	West Covina

Organization	Address	City
The Promenade	1333 W. Garvey Avenue	West Covina
Lark Ellen Village Apartments	1350 E. San Bernardino Road	West Covina
Mauna Loa Apartments	2000 W. Pacific Avenue	West Covina
Heritage Park Senior Apartments	1800 W. Badillo Street	West Covina
Vintage Gardens	1950 Badillo Street	West Covina
West Covina Senior Villas	1842 E. Workman Avenue	West Covina
West Covina Senior Villas II	1838 E. Workman Avenue	West Covina

The comments from community members and representative groups from this broad effort to involve all segments of the community were considered by City decision-makers in preparing this Housing Element update. Summary of the common themes or comments raised throughout the element update process and responses to those comments can be found in Table C-2 below.

Table C-2 Summary of Public Comments

Comment	How this Comment was Addressed in the Housing Element
There is not sufficient housing in West Covina to meet the need.	This is unfortunately the case in nearly all areas, and while cities have an important role in facilitating additional housing development, there are many other factors that restrict development or contribute to high housing cost. The Housing Element identifies many strategies the City of West Covina is implementing to encourage housing production and affordability.
Environmental issues such as water supply limit the amount of new housing	The Housing Element includes analysis of environmental and infrastructure constraints on potential housing development.
Housing assistance for seniors is needed	The Housing Element identifies programs to address the housing needs of seniors and other groups with special housing needs.
The City should publicize housing programs and public meetings on its website	In addition to the City website, information on housing programs and meetings is made available in City Hall, in other public offices, and in social media.
The Housing Element seems to equate areas with older housing as being lower income, but that's not always the case.	This is certainly true, and the City's efforts focus on maintaining and improving older neighborhoods.
The shortage of affordable housing is in part due to the abolishment of Redevelopment Agencies.	The State's dissolution of redevelopment agencies resulted in a loss of about \$1 billion per year in funds for affordable housing statewide.
Cities should encourage homes that are compatible with seniors.	The City encourages housing accessibility through building codes and also through reasonable accommodation for persons with disabilities.
Requirements for more housing need to consider the impact of additional vehicles and traffic on existing neighborhoods.	State housing mandates through the Regional Housing Needs Assessment do not consider impacts such as increased traffic.
Cities should require affordable housing in some of the more expensive developments.	Mandatory requirements for affordable housing (referred to as "inclusionary housing") have been adopted in some cities; however, other strategies such as density bonus incentives can also facilitate production of affordable housing.
If a site is listed in the inventory, is it required to be developed for affordable housing?	No, the sites inventory only describes where additional housing could be built based on zoning regulations. Property owners will decide if and when development occurs. The City or the State cannot force property owners to develop their property for housing.
The sites inventory should include the HCD-recommended buffer of at least 15-30 percent extra capacity in order to avoid violating the No Net Loss requirement	As noted in Appendix B, the sites inventory includes conservative assumptions regarding the number of potential housing units to ensure a buffer above the RHNA.

Comment	How this Comment was Addressed in the Housing Element
Lower-income sites should be located in high opportunity areas to affirmatively further fair housing.	As noted in the sites inventory and the AFFH analysis, all of the sites are located in areas identified by TCAC as high or moderate resource.
Housing element updates should use an HCD-recommended "safe harbor" methodology for forecasting future ADU production.	The ADU estimate in the sites inventory is based on HCD methodology.
The Southwest Regional Council of Carpenters recommends that the City require housing projects to require local hire and use of a skilled and trained workforce to build such projects.	The City appreciates SRCC's comments and the potential air quality benefits of local hire policies. However, because construction labor affects both residential and non-residential construction, local hire and prevailing wage policies go beyond the scope of the Housing Element and may be more appropriately considered in a different format, such as consideration of a general City policy regarding construction labor agreements in West Covina.
Development should not permanently displace current residents. Housing replacement programs, temporary housing vouchers, right of return, and demolition controls will create stability for renters while allowing new homes to be built for new households and to accommodate the growth associated with RHNA. In your sites inventory and rezoning programs, you should prioritize development on sites with owner-occupied housing & commercial uses over those with existing rent-controlled apartments or other rental housing with lower income residents.	As noted in Appendix B (Sites Inventory) very few of the sites identified for potential future housing development are occupied by residential uses; therefore, minimal displacement of existing residents would occur. In rare instances where existing housing units could be displaced, appropriate provisions will be required consistent with State law.
The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.	The Housing Element supports home ownership through increased homeownership education and outreach programs for minority and/or low- and moderate-income residents, as well as through the expansion of housing and mixed-use development opportunities.
Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity. This density should be emphasized around jobs and transit and should go beyond the Mullin density in those areas.	As described in the Constraints analysis and Appendix B (Sites Inventory), development standards such as height and FAR are appropriate to facilitate development at the densities assumed in the sites inventory.
Allow residential to be built in areas that are zoned for commercial use.	As described in Appendix B (Sites Inventory) the Mixed Use Overlay zone allows higher-density residential development in areas currently zoned only for non-residential use.



Frequently Asked Questions 2021 Housing Element Update

1. What is a Housing Element?

State law¹ requires each city to adopt a comprehensive, long-term General Plan for its physical development. General Plans include several “elements” that address various topics. The West Covina General Plan² - referred to as *PlanWC* - is organized under the following themes:

- Our Natural Community (Conservation, Open Space)
- Our Prosperous Community (Economic Development)
- Our Well-Planned Community (Land Use/Design, Housing, Parks/Recreation)
- Our Accessible Community (Circulation)
- Our Resilient Community (Land Use)
- Our Healthy & Safe Community (Public Health, Safety, Noise, and Land Use)
- Our Active Community (Land Use, Open Space, Parks/Recreation)
- Our Creative Community (Culture)

PlanWC was adopted in 2016 and has a time horizon of about 20 years. However, State law requires that the Housing Element be updated every 8 years. Housing Element planning periods are sometimes referred to as “cycles”. The City’s current Housing Element covers the planning period extending from 2013 to 2021, which is referred to as the “5th Housing Element cycle” in reference to the five required updates that have occurred since the comprehensive revision to State Housing Element law in 1980. Every city in the Southern California Association of Governments (“SCAG”) region³ is required to prepare a Housing Element update for the 6th planning cycle, which spans the 2021-2029 period, regardless of when the other elements of the General Plan were adopted.

State law⁴ establishes detailed requirements for Housing Elements, which are summarized in California Government Code Section 65583:

The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

¹ California Government Code Sec. 65300 *et seq.*

² <https://www.westcovina.org/departments/community-development/planning-division/general-plan>

³ The SCAG region includes Los Angeles, Orange, Riverside, San Bernardino, Ventura and Imperial counties.

⁴ California Government Code Sec. 65580 *et seq.*

2. What are the most important issues that must be addressed in the Housing Element?

The major issues that must be addressed in the Housing Element are: 1) how City policies, plans and regulations help to meet the region's housing needs for households of all income levels; and 2) how City land use regulations accommodate the special housing needs of persons with disabilities or other difficulties.

- **Accommodating Regional Housing Needs.** Every community is dependent on a variety of low- and moderate-income workers in jobs such as child and elder care, medical support, business and personal services, retail trade, construction and maintenance. Governmental programs provide funding assistance for affordable housing, but city plans and regulations determine the type and location of new housing. Therefore, a sufficient supply of affordable housing is dependent on both city regulations and housing subsidies. Under State law⁶ all cities are required to plan for additional housing to accommodate population growth and existing housing problems such as overcrowding and high housing cost. State law recognizes that most housing is built by private developers and builders, not cities. However, cities are required to adopt policies, plans, development regulations and standards to encourage a variety of housing types that are affordable for persons of all income levels, including multi-family rental housing and accessory dwelling units ("ADUs"). The Regional Housing Needs Assessment ("RHNA") is the method by which each jurisdiction's share of new housing needs is determined (see #4 below).
- **Housing for Persons with Special Needs.** Under State law⁶ cities must also ensure that their plans and regulations encourage the provision of housing for persons with special needs including:
 - ✓ Reasonable accommodation for persons with disabilities
 - ✓ Transitional housing
 - ✓ Supportive housing
 - ✓ Residential care facilities
 - ✓ Emergency shelters and "navigation centers"
 - ✓ Large (5+) families

3. What is "affordable" housing?

By definition, housing is usually considered "affordable" when total housing cost, including utilities, is no more than 30% of a family's gross income. State law describes five income categories, which are based on county median income as shown in Table 1.

Table 1. Household Income Categories

Income Category	% of county median income
Extremely low	Up to 30%
Very low	31-50%
Low	51-80%
Moderate	81-120%
Above moderate	Over 120%

Source: California Government Code Sec. 65584(f)

³ California Government Code Sec. 65583

⁶ California Government Code Sec. 65583(a)(5)

Affordable housing costs for all jurisdictions in Los Angeles County that correspond to these income categories are shown in the following table. Affordability figures are adjusted each year and are based on family size. Table 2 provides figures for a 4-person family in Los Angeles County in 2020/21.

Table 2. Income Categories and Affordable Housing Costs - Los Angeles County

Income Category	Maximum Income	Maximum Affordable Rent	Maximum Affordable Price (est.)
Extremely low	\$33,800	\$845	*
Very low	\$56,300	\$1,407	*
Low	\$90,100	\$2,252	*
Moderate	\$92,750	\$2,319	\$375,000
Above moderate	Over \$92,750	Over \$2,319	Over \$375,000

Assumptions:

- Based on a family of 4 and 2020 State income limits
- 30% of gross income for rent or principal, interest, taxes & insurance plus utility allowance
- 10% down payment, 3.75% interest, 1.25% taxes & insurance, \$300 HOA dues

* For-sale affordable housing is typically at the moderate-income level

Source: Cal. HCD; JHD Planning LLC

4. What is the RHNA why is it important?

Each California city is required to plan for new housing to accommodate a share of regional needs. The Regional Housing Needs Assessment (“RHNA”) is the process established in State law⁷ by which each city’s housing needs are assigned.

Prior to each Housing Element planning cycle the region’s total housing need is determined by HCD based upon economic and demographic trends, existing housing problems such as overcrowding and overpayment, and additional housing needed to ensure reasonable vacancy rates and replace units lost due to demolition or natural disasters. The total housing need for the region is then distributed to cities and counties by SCAG based upon criteria established in State law.⁸

In 2019 HCD determined that the total new housing need for the entire SCAG region in the 6th Housing Element cycle is 1,341,827 units. SCAG then prepared a RHNA plan that fully allocates the total RHNA to jurisdictions in the SCAG region.⁹ SCAG adopted the final RHNA plan in March 2021.

Table 3 shows the RHNA allocations for West Covina, Los Angeles County, and the entire SCAG region.

Table 3. 6th Cycle RHNA - West Covina, Los Angeles County and SCAG Region

	West Covina	Los Angeles County	SCAG Region
RHNA allocation 2021-2029 (housing units)	5,346	812,060	1,341,827

Source: SCAG, 3/4/2021

The RHNA distributes each jurisdiction’s total housing need by the income categories shown in Tables 1 and 2 above (the extremely-low and very-low categories are combined

⁷ California Government Code Sec. 65584 et seq.

⁸ California Government Code Sec. 65584(d)

⁹ <http://www.scag.ca.gov/programs/pages/housing.aspx>

for RHNA purposes). For West Covina the 6th cycle RHNA allocation by income category is shown in Table 4.

Table 4. 6th RHNA by Income Category - West Covina

Very Low	Low	Moderate	Above Moderate	Total
1,653	850	865	1,978	5,346

Source: SCAG, 3/4/2021

5. Is the RHNA a construction quota or mandate?

The RHNA allocation identifies the amount of additional housing a jurisdiction would require in order to have enough housing at all price levels to fully meet the needs of its existing population plus its assigned share projected growth over the next 8 years while avoiding problems like overcrowding and overpayment. The RHNA is a planning requirement that determines housing need, *not a construction quota or mandate*. Jurisdictions are not required to build housing or issue permits to achieve their RHNA allocations, but some provisions of State law establish specific requirements when housing production falls short of RHNA allocations. One such requirement is streamlined review and approval of housing development applications that meet specific standards.¹⁰ Other than requirements for streamlined permit processing, there are currently no legal or financial penalties imposed on cities that do not achieve their RHNA allocations.

6. What must cities do to comply with the RHNA?

Each Housing Element update must analyze the city's capacity for additional housing based on an evaluation of land use patterns, development regulations, development constraints (such as infrastructure availability and environmental conditions) and real estate market trends. The analysis must be prepared at a parcel-specific level of detail and identify properties (or "sites") where additional housing could be built consistent with current regulations. This evaluation is referred to as the "sites analysis" and State law requires the analysis to demonstrate that the city has adequate capacity to fully accommodate its RHNA allocation in each income category. If the sites analysis does not demonstrate that adequate capacity exists to fully accommodate the RHNA, the Housing Element must describe what steps will be taken to increase capacity commensurate with the RHNA – typically through amendments to land use and zoning regulations that could facilitate additional housing development. Such amendments typically include increasing the allowable residential density or allowing housing to be built in areas that are currently restricted to only non-residential land uses.

7. West Covina is fully developed. Why is the RHNA allocation so high?

SCAG's total RHNA allocation for the 6th cycle is 1,341,827 units compared to 412,137 units in the 5th cycle. There are two main reasons why the region-wide 6th RHNA allocation is so much higher than the 5th cycle.

¹⁰ California Government Code Sec. 65913.4 (SB 35 of 2017)

First, the 5th RHNA allocation was established in 2012 while the severe economic effects of the “Great Recession” were still adversely affecting growth and the foreclosure crisis led to high vacancy rates. As a result, the 5th RHNA was uncharacteristically low. For comparison, SCAG’s 4th cycle (2006-2013) RHNA allocation was approximately 700,000 units.

Second, for the 6th cycle the State made a major modification to the process for determining RHNA allocations due to the “housing crisis.” In prior RHNA cycles, total housing need was based only on projected population growth. However, for the 6th RHNA cycle the State added *existing need* to the total RHNA calculation. Existing need includes households that are currently overcrowded (defined as more than one person per room) or are overpaying for housing (defined as more than 30% of gross income). The total 6th cycle RHNA allocation for the SCAG region is comprised of the sum of existing need and projected need, as follows:

Existing need:	836,857 units
<u>Projected need:</u>	<u>504,970 units</u>
Total need:	1,341,827 units

Source: SCAG, 5/3/2021 letter to the State Legislature

As seen from this breakdown, if existing need were not included (as in prior RHNA cycles) the total need for the SCAG region would be similar to prior RHNA allocations.

With regard to jurisdictional RHNA allocations, the methodology adopted by SCAG for the 6th cycle places greater emphasis on the proximity of jobs and transportation rather than vacant developable land. As a result, the urbanized areas of Los Angeles and Orange counties are assigned a higher proportion of the region’s housing need as compared to prior cycles even though they generally have much less vacant land than inland areas.

8. How can West Covina accommodate its RHNA allocation and remain in compliance with State housing law?

The RHNA is a planning target and cities are not required to achieve their RHNA allocations but must demonstrate that their land use plans and regulations allow housing development commensurate with the RHNA. Because there is very little vacant land in West Covina that is suitable for housing development, the most significant opportunities for new housing are in areas zoned for non-residential or mixed use. Under State law, areas that are zoned to allow residential development at a density of 30 units/acre are considered appropriate to facilitate production of affordable housing. As part of the Housing Element update, the City will evaluate the potential for new housing development and determine whether any changes to land use plans and zoning are necessary in order to accommodate the amount of new housing assigned to the City in the RHNA.

9. Housing development is very expensive in the urban areas of Southern California. How can cities achieve their assigned affordable housing needs?

Housing development is very expensive in Southern California, and housing that is affordable to low- and moderate-income families typically requires large subsidies. While State housing law is based on the premise that every city has an obligation to use its governmental powers to encourage housing development at all income levels, it is

recognized that available financial resources are not sufficient to produce all of the affordable housing needed. Therefore, if a city has adopted appropriate plans and regulations to encourage housing development commensurate with its RHNA allocation, it will not be penalized if actual production does not achieve assigned needs.

10. What is “certification” of the Housing Element and why is it important?

The State Legislature has delegated to the California Department of Housing and Community Development (“HCD”) the authority to review Housing Elements and issue findings regarding the elements’ compliance with the law.¹¹ When HCD issues a letter finding that the Housing Element is in substantial compliance with State law it is referred to as “certification” of the Housing Element. In 2014 HCD determined that West Covina’s current Housing Element was in full compliance with State law. The City is now preparing a Housing Element update for the 2021-2029 period.

Housing Element certification is important for several reasons:

- **Local control.** The General Plan and its various elements provide the foundation for the City’s land use plans and zoning regulations, and the Housing Element is part of the General Plan. If the City were challenged in court on a planning or zoning matter and the Housing Element were found by the court to be invalid, the court could order changes to City land use plans or regulations and assume control over City land use decisions. HCD certification establishes a “rebuttable presumption of validity”¹² that the Housing Element is adequate under State law, which would support the City’s legal defense. Recent laws also allow for courts to impose fines if a jurisdiction fails to adopt a compliant Housing Element.¹³
- **Eligibility for grant funds.** Some State grant funds are contingent upon Housing Element certification.

¹¹ California Government Code Sec. 65585

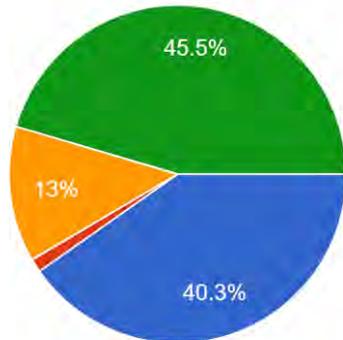
¹² California Government Code Sec. 65589.3.

¹³ AB 101 of 2019

C.1 Online Housing Survey Results

Do you currently live and/or work in West Covina?

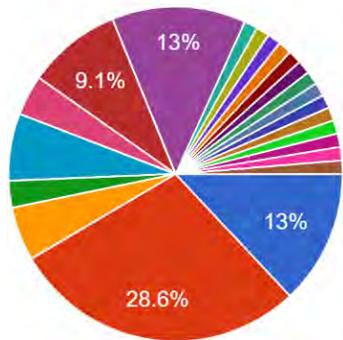
77 responses



- I live in West Covina but work somewhere else
- I work in West Covina but live somewhere else
- I live and work in West Covina
- I live in West Covina and do not currently work or I'm retired

What do you consider to be the most pressing housing problems in West Covina?

77 responses

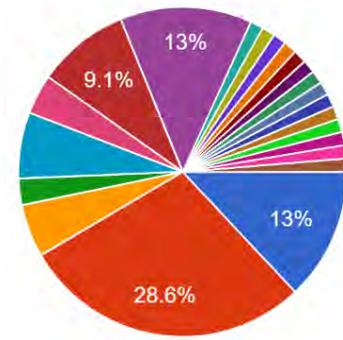


- I'm not aware of any significant housing problems
- Too many people can't find suitable housing
- More housing options are needed for...
- More houses and apartments with 4+ bedrooms
- More housing options with supportive services
- Fair housing
- Risk of foreclosure for homeowners
- Risk of eviction for renters

▲ 1/4 ▼

What do you consider to be the most pressing housing problems in West Covina?

77 responses

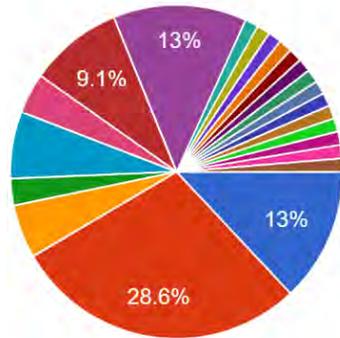


- Financial assistance with home repairs
- More small apartments or condos are needed
- More temporary housing is needed for...
- More housing is needed close to schools
- We don't need more housing. Financial issues are the problem
- Lack of leadership
- Homeless
- Homelessness due to vocational, substance dependence, mental health issues

▲ 2/4 ▼

What do you consider to be the most pressing housing problems in West Covina?

77 responses

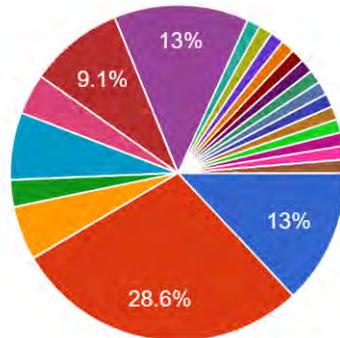


- Too many homeless people on streets
- Homeless people at parks and public...
- State legislation not allowing the City t...
- High Density Housing is destroying th...
- Stop all these illegal garage conversio...
- Safety/ homelessness issues need to...
- vocational , health and resource for di...
- Less new projects of high density / sm...

▲ 3/4 ▼

What do you consider to be the most pressing housing problems in West Covina?

77 responses

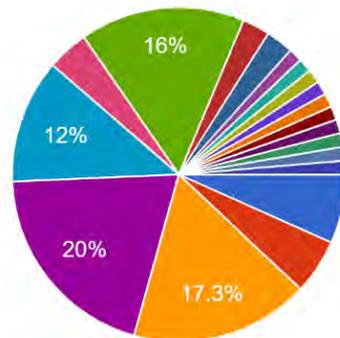


- Two: low & middle income housing is unavailable/unattainable; homeless need homes-public health concern

▲ 4/4 ▼

If you live in West Covina, what were the main reasons you chose to live here?

75 responses

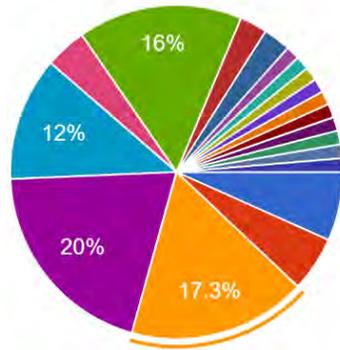


- Close to my workplace
- Housing quality
- Attractive neighborhoods
- Local recreational amenities
- Close to family and/or friends
- Good housing value
- Quality of local schools
- Neighborhood safety

▲ 1/3 ▼

If you live in West Covina, what were the main reasons you chose to live here?

75 responses

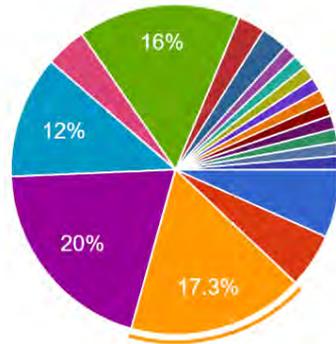


- City services, facilities and programs
- Proximity to shopping and services
- I came here to claim my piece of subu...
- Grew up here
- Long time resident when a great com...
- no choice
- I was raised in West Covina and later...
- I've lived here my entire life (45yrs)

▲ 2/3 ▼

If you live in West Covina, what were the main reasons you chose to live here?

75 responses



- Because I bought my house 20 years ago. It's gone to hell since then and I can't wait to leave.
- been here all my life
- In 2007, was better than where we were at the time. Seemed nice.
- I grew up here

▲ 3/3 ▼

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Appendix D

Fair Housing Assessment

Assembly Bill 686, signed in 2018, establishes a statewide framework to affirmatively further fair housing (AFFH) with the goal of achieving better economic and health outcomes for all Californians through equitable housing policies. AB 686 requires cities and counties to take deliberate actions to foster inclusive communities, advance fair and equal housing choice, and address racial and economic disparities through local policies and programs. Housing elements are now required to address the following five components:

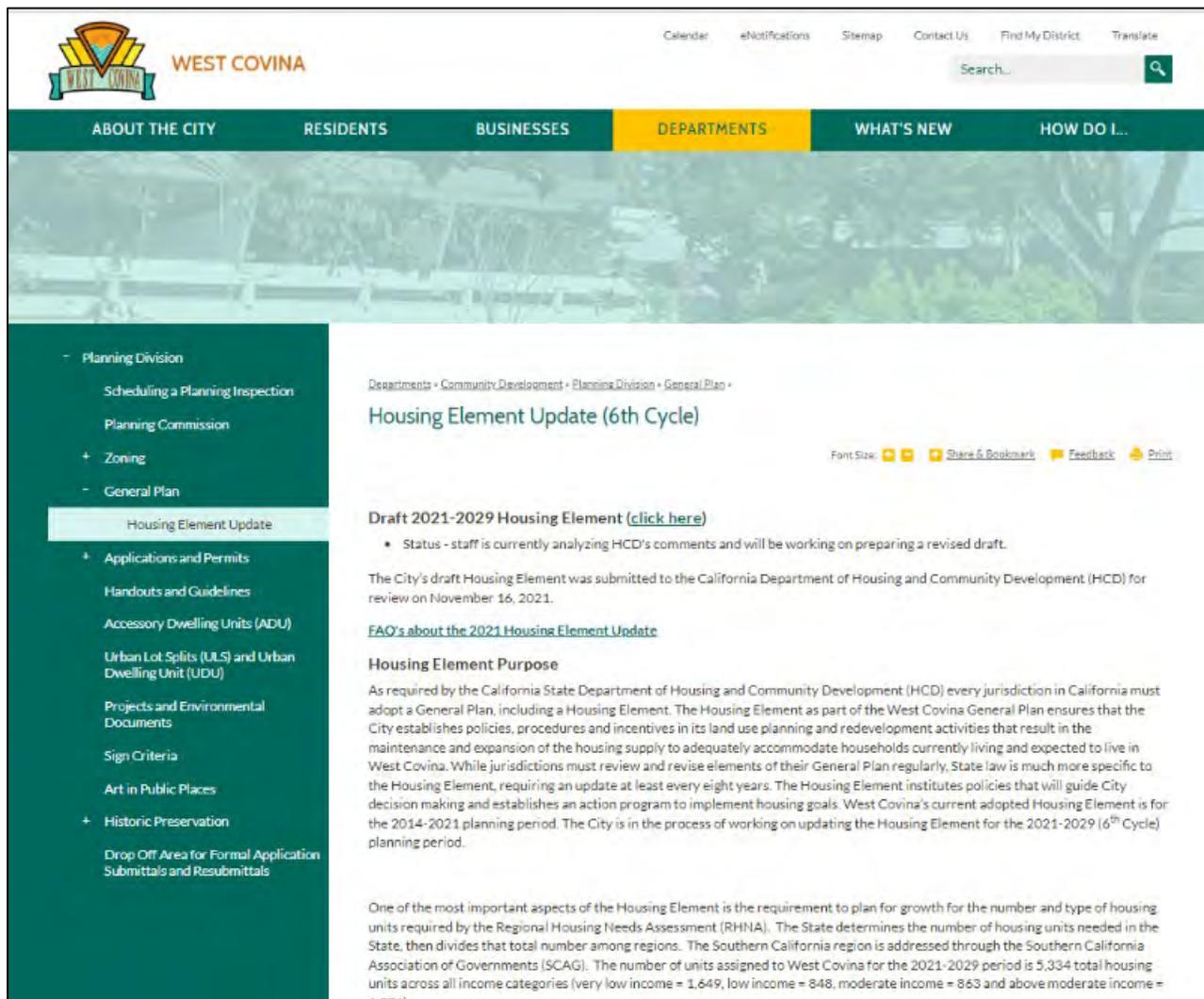
- **Inclusive and Equitable Outreach:** A summary of fair housing outreach and capacity that includes all economic segments of the community.
- **Assessment of Fair Housing:** An assessment of fair housing issues, including integration and segregation patterns, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs.
- **Analysis of Sites Inventory:** An evaluation of whether the sites inventory improve or exacerbate conditions for fair housing.
- **Identification of Contributing Factors:** The identification and prioritization of contributing factors related to fair housing issue.
- **Priorities, Goals, and Actions to AFFH:** The identification of fair housing goals and actions that directly address the contributing factors outlined above. The housing element should include metrics and milestones for evaluating progress and fair housing results.

D.1 Outreach

As discussed in Appendix C: Public Participation, early in the Housing Element update process the City developed a list of stakeholders with local expertise in housing issues, including fair housing. The stakeholder list included local service providers, affordable housing developers, and fair housing organizations in an effort to include the interests of lower-income residents and persons with special needs in the community.

Over the course of the Housing Element update process the City conducted a series of public meetings. Public notice of each meeting was posted on the City's dedicated Housing Element website and was also sent directly to persons and organizations on the stakeholder list. Public meetings were held both online and in person to encourage those with mobility difficulties to participate. Agendas and other information for each meeting was posted on the City website to allow interested stakeholders to access to this information throughout the process. Interested persons were also encouraged to provide input or ask

questions via telephone or email. Please refer to Appendix C for additional information regarding the outreach efforts and how public input was incorporated into the Housing Element. All notices and other information posted on the website was available in multiple languages.



In addition to public workshops and hearings, the City also directly contacted housing advocates, housing service providers, and community organizations who serve the interests of lower-income households and special needs groups to solicit comments on housing needs, barriers to fair and affordable housing, and opportunities for development.

To encourage continued stakeholder involvement in local housing issues throughout the planning period, Program 4.1 includes a commitment to conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

D.1.1 Fair Housing Assessment

This section provides an assessment of fair housing issues in West Covina including fair housing enforcement and outreach capacity, patterns of integration and segregation, racial or ethnic patterns of concentration, disparities in access to opportunities, and disproportionate housing needs, including displacement risk.

D.1.2 Fair Housing Enforcement and Outreach Capacity

Fair housing complaints can be an indicator of housing discrimination. Fair housing issues can arise through discrimination against an individual based on disability, race, national origin, familial status, disability, religion, or sex when renting or selling a dwelling unit.

The U.S. Department of Housing and Urban Development's (HUD) Office of Fair Housing and Equal Opportunity (FHEO) is the federal agency responsible for eliminating housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. FHEO services and activities include investigating fair housing complaints, conducting compliance reviews, ensuring civil rights in HUD programs, and managing fair housing grants.

Locally, the City of West Covina partners with the Housing Rights Center (HRC) to investigate and address fair housing complaints. HRC is a non-profit organization approved by HUD that works with local government offices to ensure fair housing laws are upheld. HRC provides various services to Los Angeles County stakeholders, including tenant/landlord mediation, credit counseling, and fair housing training and workshops.

During the most recent reporting period for the 2020-2021 fiscal year, the HRC provided assistance to 66 West Covina residents, 11 of which were related to housing discrimination and 55 were for other housing issues. HRC noted that of the 11 discrimination inquiries, nine were related to physical disability and two were related to national origin. HRC opened investigations for three of these matters, one of which was successfully conciliated, with the other two closed when the clients withdrew their complaints. Of the 55 residents with general housing questions, the greatest number addressed notices/evictions (2.6 percent), seeking housing (2.2 percent), and rent increases (1.3 percent). Most of those residents served (97 percent) were of low to extremely-low income and 5.2 percent reported their ethnicity as Hispanic/Latino.

The City does not have any pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights.

The City provides residents with fair housing information by posting links to fair housing organizations on the City's website.

The HCD AFFH Data Viewer reported an FHEO case rate of 0.11 per 1,000 persons for the 2013-2021 period in West Covina. During this time period, a total of 12 fair housing inquiries were reported in West Covina. Six of these cases were filed on the basis of disability, two on national origin, one on race, one on sex, and five on retaliation. The City continues to work

cooperatively with the HRC to implement the regional Fair Housing Plan (AI) and to offer fair housing services and tenant/landlord counseling to residents.

D.2 Patterns of Integration and Segregation

D.2.1 Race and Ethnicity

As seen in Figure D-1, the percentage of non-White population is more than 60% throughout West Covina, similar to the adjacent cities in southern Los Angeles County. The non-White percentage is slightly lower (61 to 80 percent) in the eastern and northern portions of the city, which is similar to the adjacent unincorporated County area, compared to the western and southern portions of the city (81 to 100 percent).

Racial characteristics for Los Angeles County are illustrated in Figure D-2. Non-white residents are concentrated in the more urban southern portion of the county, including Central Los Angeles, the Gateway Cities, and the San Gabriel Valley, as well as the cities of Lancaster and Palmdale.

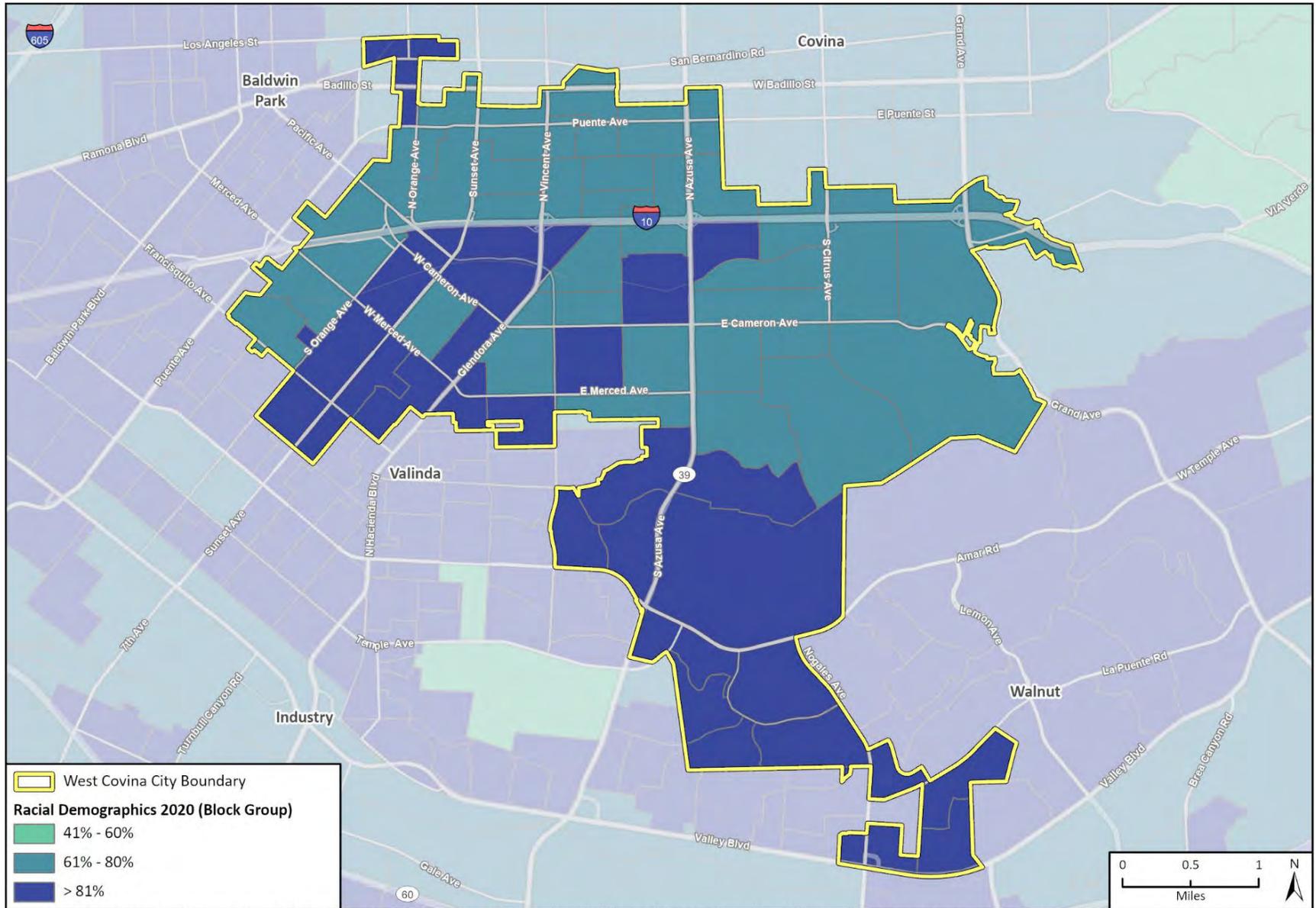
Over the past decade, racial/ethnic diversity increased slightly. The percent of non-White residents increased by 5 percent (Table D-1). The percent of Asian/Pacific Islander residents increased by 5 percent and other/multiple race residents increased by one percent. Hispanic/Latino residents decreased by one percent, and Black/African American residents and Native American/Native Alaskan residents remained the same.

Table D-1 Population by Race – West Covina (2011 and 2021)

Race	2011	2021
Hispanic/Latino	53.6%	52.6%
Not Hispanic/Latino	46.4%	47.4%
Asian/Pacific Islander	24.6%	29.6%
White	15.6%	10.6%
Black/African American	4.7%	4.5%
Other or Multiple Races	1.4%	2.3%
Native American/Native Alaskan	0.1%	0.3%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2007-2011, 2017-2021), Table DP05.

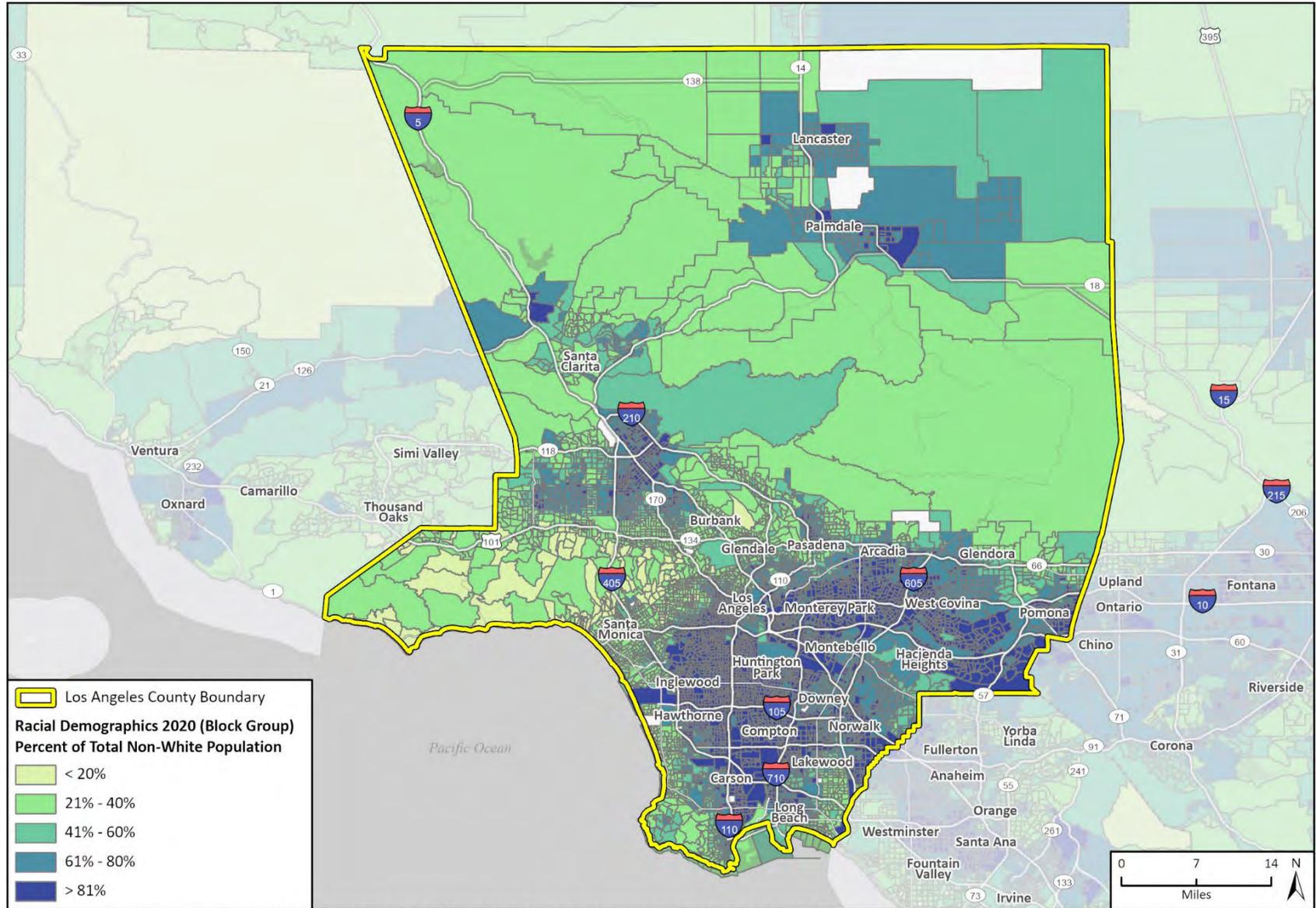
Figure D-1 Racial Demographics – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-2 Racial Demographics – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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D.2.2 Persons with Disabilities

Approximately 11 percent of the population has a disability in West Covina. As shown on Figure D-4, estimated disability rates in West Covina is generally less than 20 percent, Areas with the lowest percent of residents with a disability, below 10 percent, are in southern and western portions of the city. The highest disability rate is in the northern portion of the city, north of SR 10 and east of Azusa Avenue where more than 20 percent of the population has a disability. The northern part of the city contains numerous senior living facilities, which may contribute to the high percentage of residents with a disability in this area.

Disability data for Los Angeles County is shown in Figure D-5. This map shows that disability rates in West Covina are generally similar to the region as a whole.

Additional information regarding persons with disabilities by disability type in West Covina is provided in the Housing Needs Assessment chapter. The most common disability in the city is ambulatory difficulty, defined as having serious difficulty walking or climbing stairs, followed by independent living difficulty (Figure D-3). Disabilities are most prevalent among senior residents. Approximately 36 percent of residents aged 65 and over have a disability. In contrast, among adults aged 18 to 34 years old, only 6 percent have a disability, and among adults aged 35 to 65, 9 percent have a disability.

Figure D-3 Disability by Type – West Covina

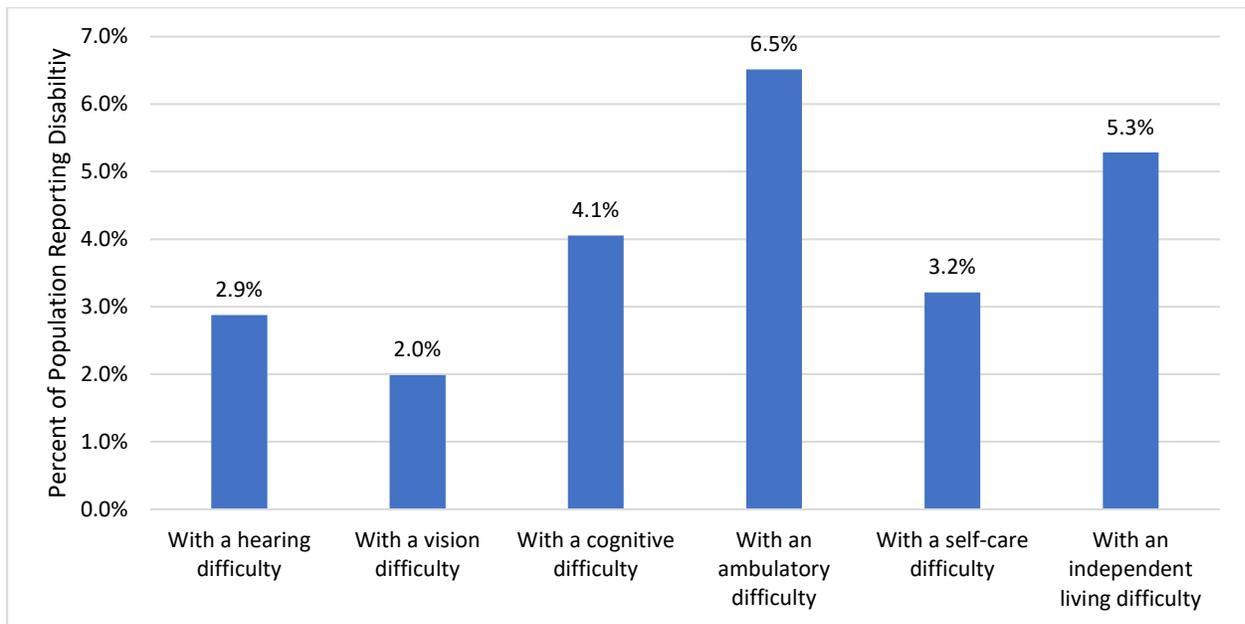
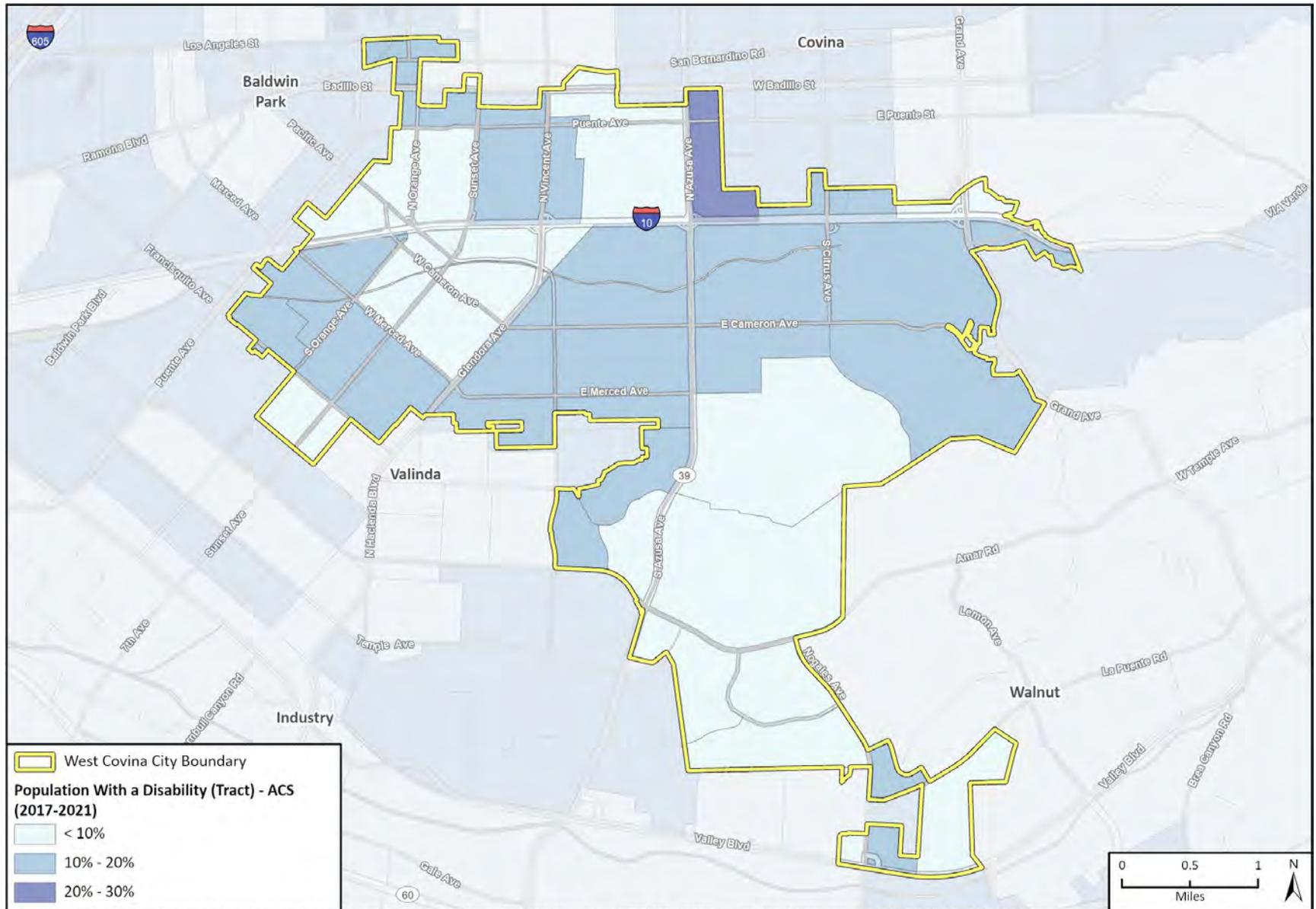


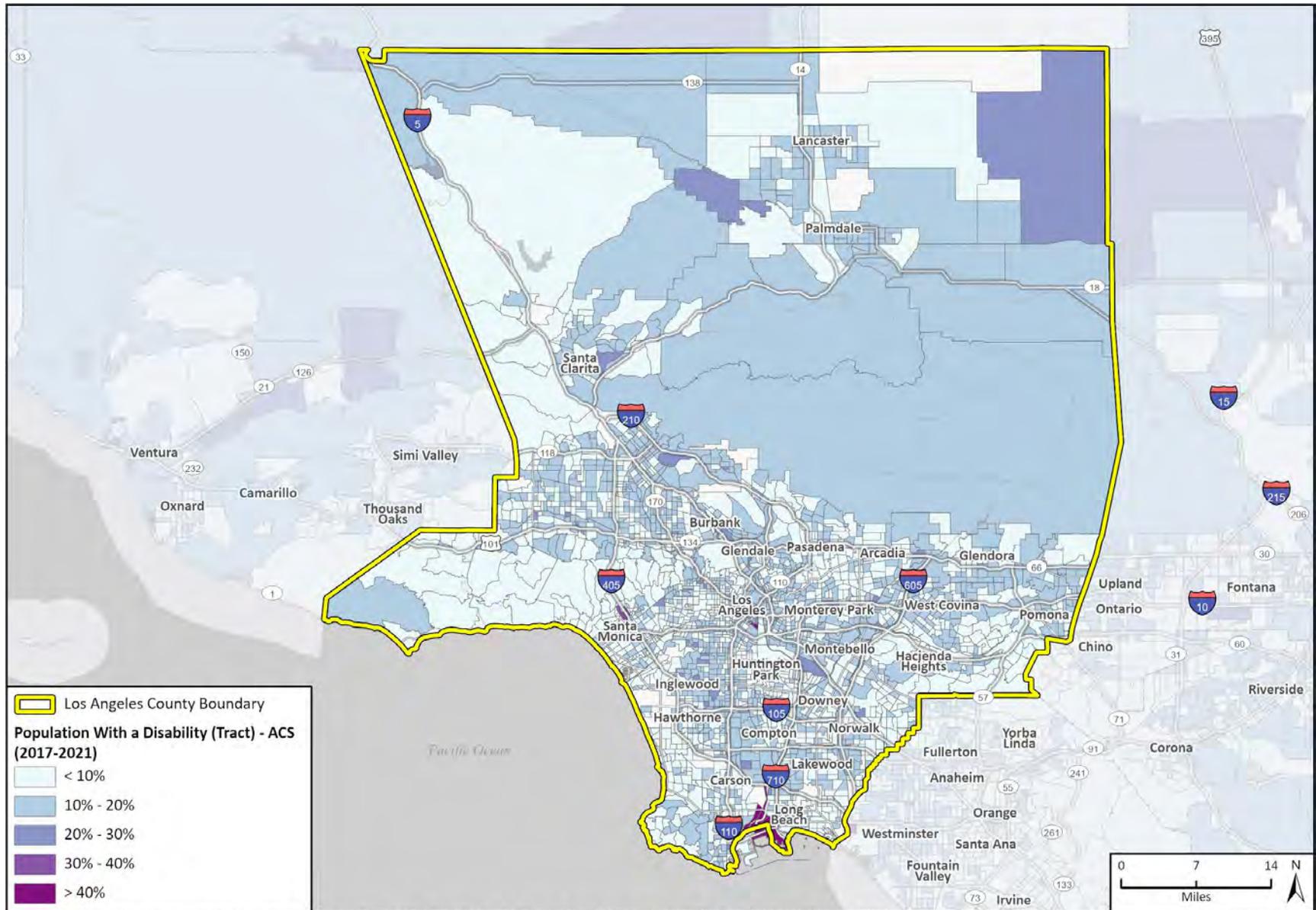
Figure D-4 Population with a Disability – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-5 Population with a Disability – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Native American/Native Alaskan and non-Hispanic/Latino white residents report the highest rates of disability by racial/ethnic group, at 20 percent and 22 percent, respectively. Other racial/ethnic groups have a significantly lower percentage of residents with a disability.

The housing needs of persons with disabilities vary, but generally include accessible and affordable housing, and access to supportive services. More severely disabled individuals may require a group living environment where supervision is provided, and the most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. As discussed in detail in Chapter 4 – Housing Constraints, the City of West Covina facilitates housing for persons with disabilities through its Reasonable Accommodation procedures and regulations to encourage production of supportive housing and residential care facilities.

D.2.3 Familial Status

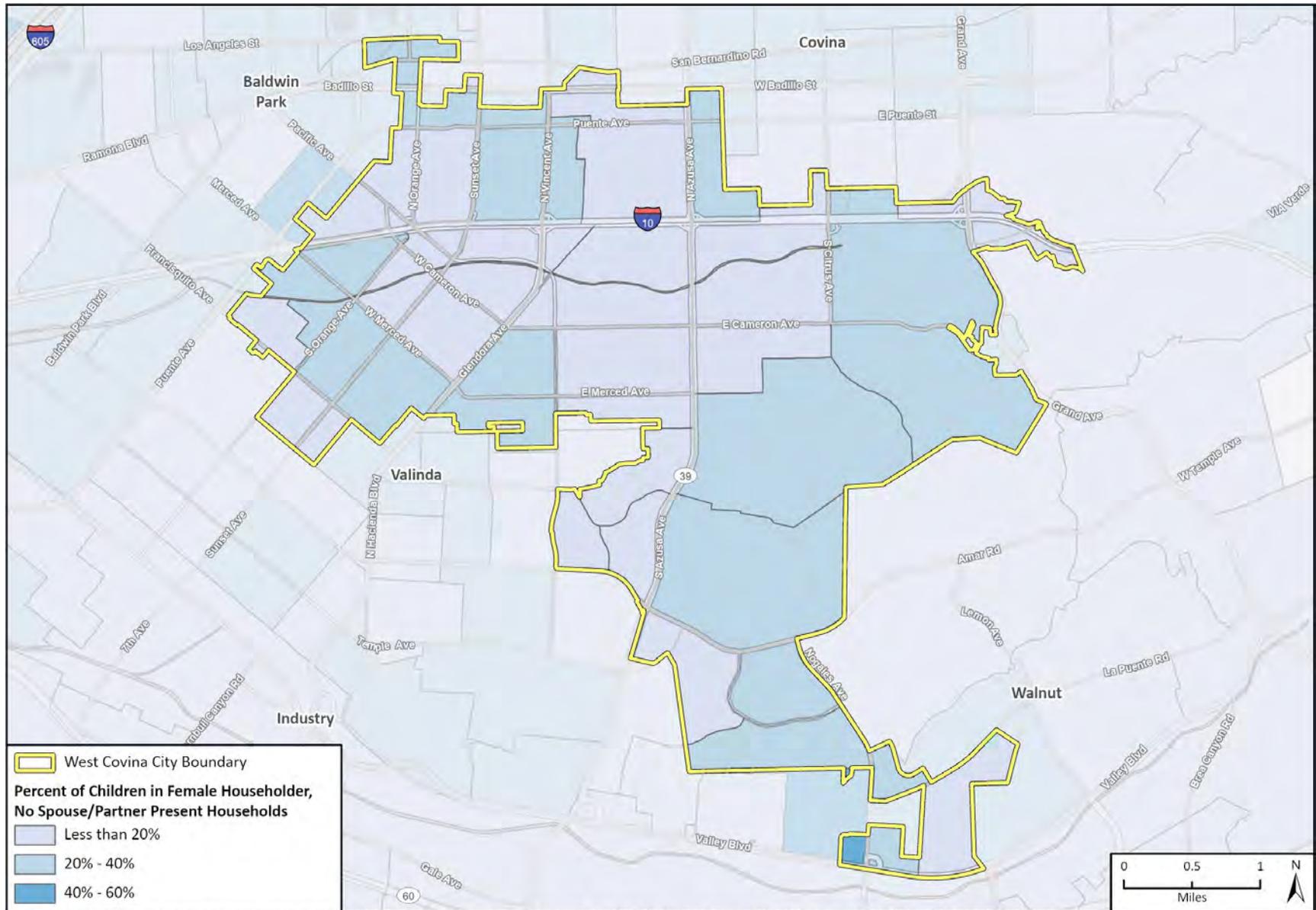
Familial status refers to the presence of children under the age of 18 (whether or not the child is biologically related to the head of household) and the marital status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns.

Single-parent households are also protected by fair housing law. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. As discussed in Section 3.7.3 of the Housing Needs Assessment, about 16 percent of West Covina households are female-headed (compared to 14 percent in the SCAG region), 6 percent are female-headed and with children (compared to 7 percent in the SCAG region), and about one percent are female-headed and with children under 6 (compared to one percent in the SCAG region).

The percent of children living in female-headed, single-parent households are higher in census tracts in eastern, southern, and western parts of the county, where between 20 and 40 percent of children live in female-headed, single-parent households (Figure D-6).

In Los Angeles County, children living in female-headed, single-parent households are concentrated in the centralized urban areas, including Central Los Angeles, the northwestern Gateway Cities, the northeastern South Bay, and the southwestern part of the San Gabriel Valley, as well as the cities of Lancaster and Palmdale (Figure D-7).

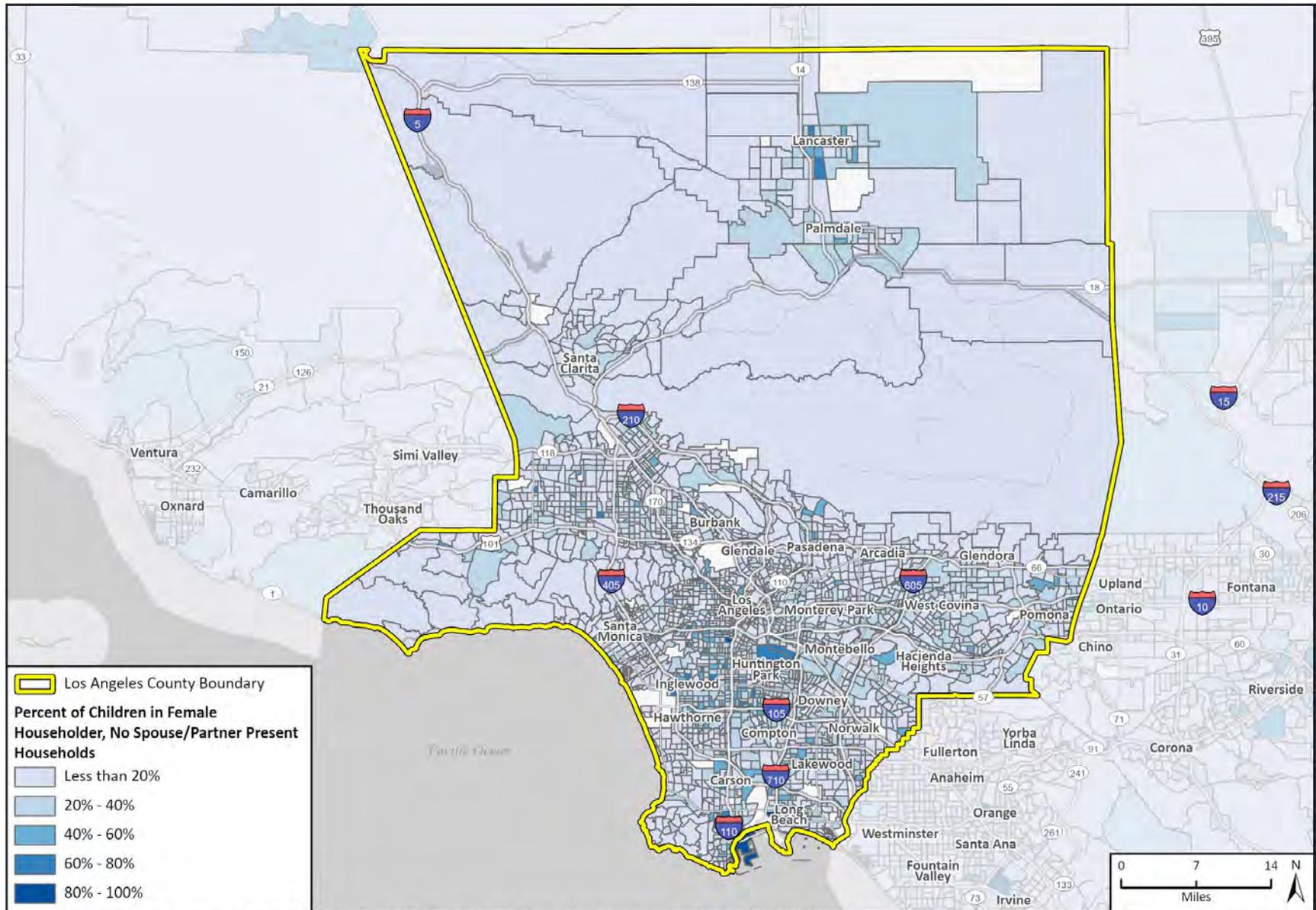
Figure D-6 Percentage of Children in Female-Headed Households, No Spouse or Partner Present – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-7 Percentage of Children in Female-Headed Households, No Spouse or Partner Present – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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D.2.4 Income

According to 2017-2021 ACS estimates, West Covina has a median household income of \$89,834, approximately 20 percent lower than Los Angeles County's median household income of \$109,430 and 7 percent higher than the State median income of \$84,097. Geographically, areas with the lowest median household incomes are concentrated in the northern and southern areas of the city, where median household income ranges from \$68,603 to \$90,000 (Figure D-8). Areas with the highest median household incomes are generally concentrated in eastern and western areas of the city, ranging from \$91,556 to \$119,175. However, the census tract with the highest median household income consists of the Shadow Oak Planned Community Development in the southern part of the city, with a median household income of \$125,129. The census tract with the lowest median household income is in the northern part of the city, west of the North Azusa Avenue Corridor. Here, median household income is \$38,182. Areas with lower median household incomes correspond to areas with a higher percentage of non-white residents (Figure D-1), residents with a disability (Figure D-4), residents below the poverty line (Figure D-13), and female-headed, single-parent households (Figure D-6). The area with the lowest median household income also has the highest percentage of residents with a disability (23 percent) and residents below the poverty line (26 percent). The southern area of the city, which has lower median household incomes, also has high segregation of non-white residents according to the Othering & Belonging Institute.

Los Angeles County area has a wide range of incomes from below \$55,000 to greater than \$175,000 (Figure D-9). The highest median household incomes in the county are generally concentrated in western areas, particularly in proximity to the cities of Malibu, Rancho Palos Verdes, and La Canada Flintridge, where median household incomes reach above \$200,000 a year. The lowest median household incomes are concentrated in the central parts of the county, which are also the most densely populated. In these areas, median household incomes reach well below \$50,000 and overlap with areas with high percentages of non-white residents (Figure D-2) and high segregation of non-white residents. Areas with lower median household income also correspond to areas with a higher percentage of residents with a disability (Figure D-5), and female-headed, single-parent households.

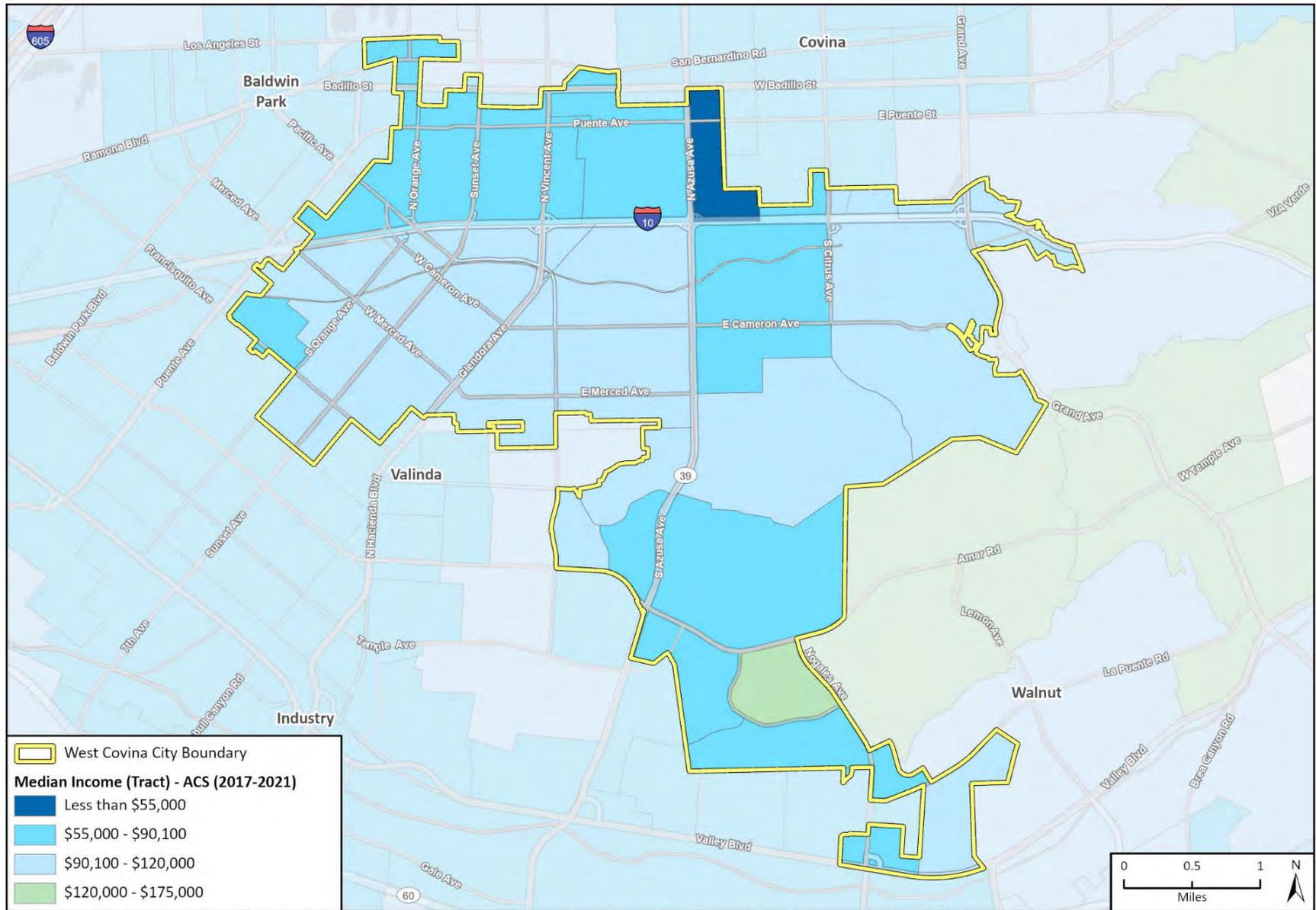
Identifying low/moderate-income (LMI) areas is an important aspect in understanding patterns of segregation. HUD defines an LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). Data for this analysis are from the HUD Low and Moderate Income Summary Data based on the 2011-2015 American Community Survey (most recent available data).¹ Figure D-10 shows that the percentage of LMI households in most areas West Covina range from 25 to 75 percent, although a few tracts in the east-central portion of the city show LMI percentages less than 25 percent. LMI populations are concentrated in

¹ HUD Exchange 2021: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

western and northern portions of the city. There are no tracts in West Covina with an LMI percentage higher than 75 percent.

For Los Angeles County, higher LMI concentrations are generally located in the northwestern and central parts of the county, including Lancaster and Palmdale, Central Los Angeles, the northwestern Gateway Cities and the southwestern part of the San Gabriel Valley (Figure D-11). In these areas, up to 75 percent to 100 percent of residents are LMI. Areas with the lowest percentage of LMI residents are concentrated in the western San Fernando Valley and Westside Cities, where the LMI population is less than 25 percent of residents.

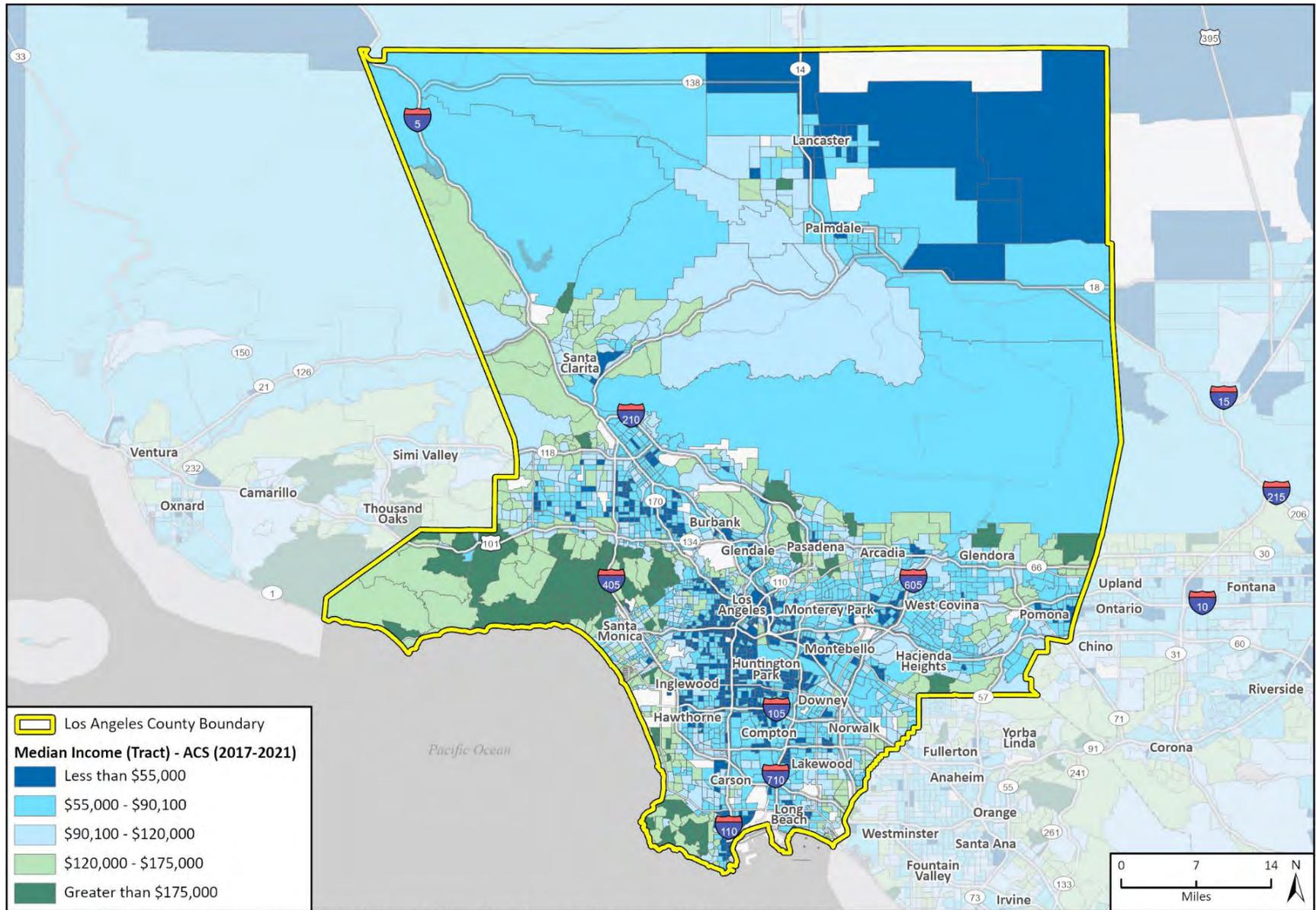
Figure D-8 Median Household Income – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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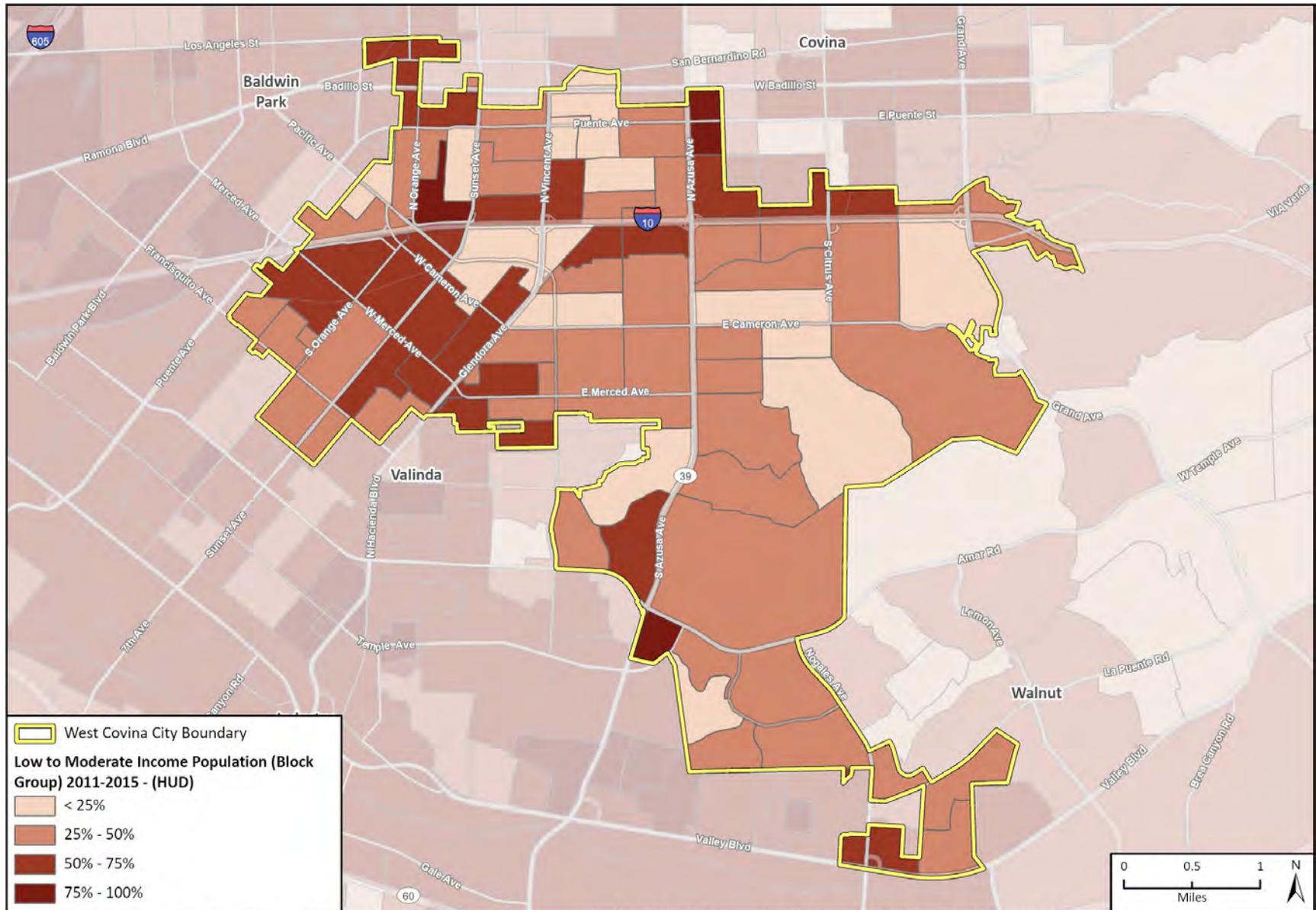
Figure D-9 Median Household Income – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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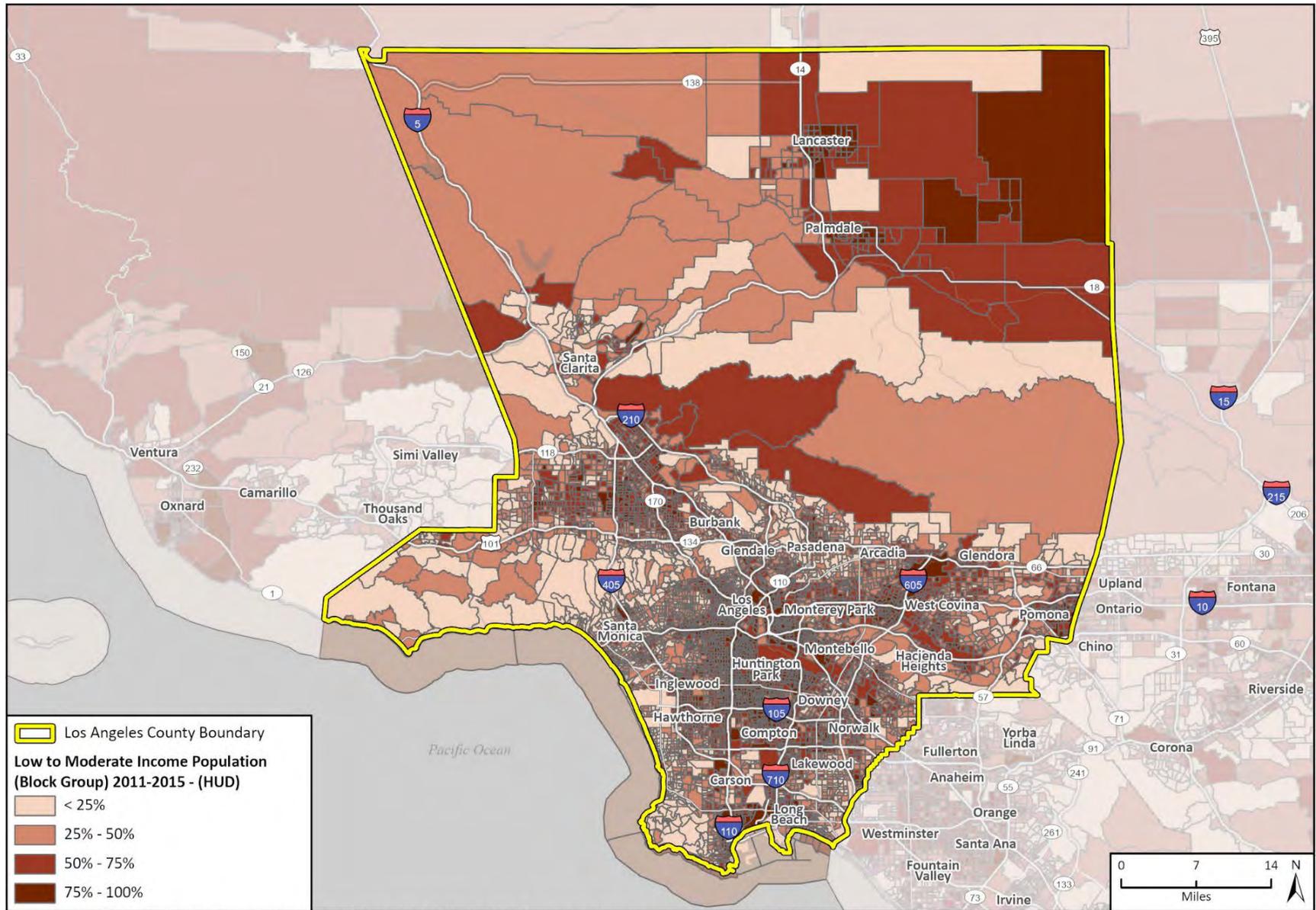
Figure D-10 Low/Moderate Income Population – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-11 Low/Moderate Income Population – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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D.2.5 Racially/Ethnically Concentrated Areas of Poverty

To identify racially and ethnically concentrated areas of poverty (known as R/ECAPs), TCAC includes a poverty concentration and racial segregation filter that aligns with HUD's R/ECAP methodology. HUD developed thresholds based on racial and ethnic concentration and income level. The threshold for racial and ethnic concentration is a non-white population of 50 percent or more in metropolitan or micropolitan areas. The income threshold is based on areas of "extreme poverty," where 40 percent or more of households earn incomes at or below the federal poverty line, or where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. An area that meets both thresholds for racial or ethnic concentration and "extreme poverty" is considered a R/ECAP.

TCAC categorizes census tracts that have both a poverty rate of over 30 percent and that are designated as being racially segregated (overrepresentation of people of color relative to the county) as areas of high segregation and poverty. There are no areas of high segregation and poverty in West Covina. The nearest areas of high segregation and poverty are located in El Monte to the west and Pomona to the east (Figure D-12).

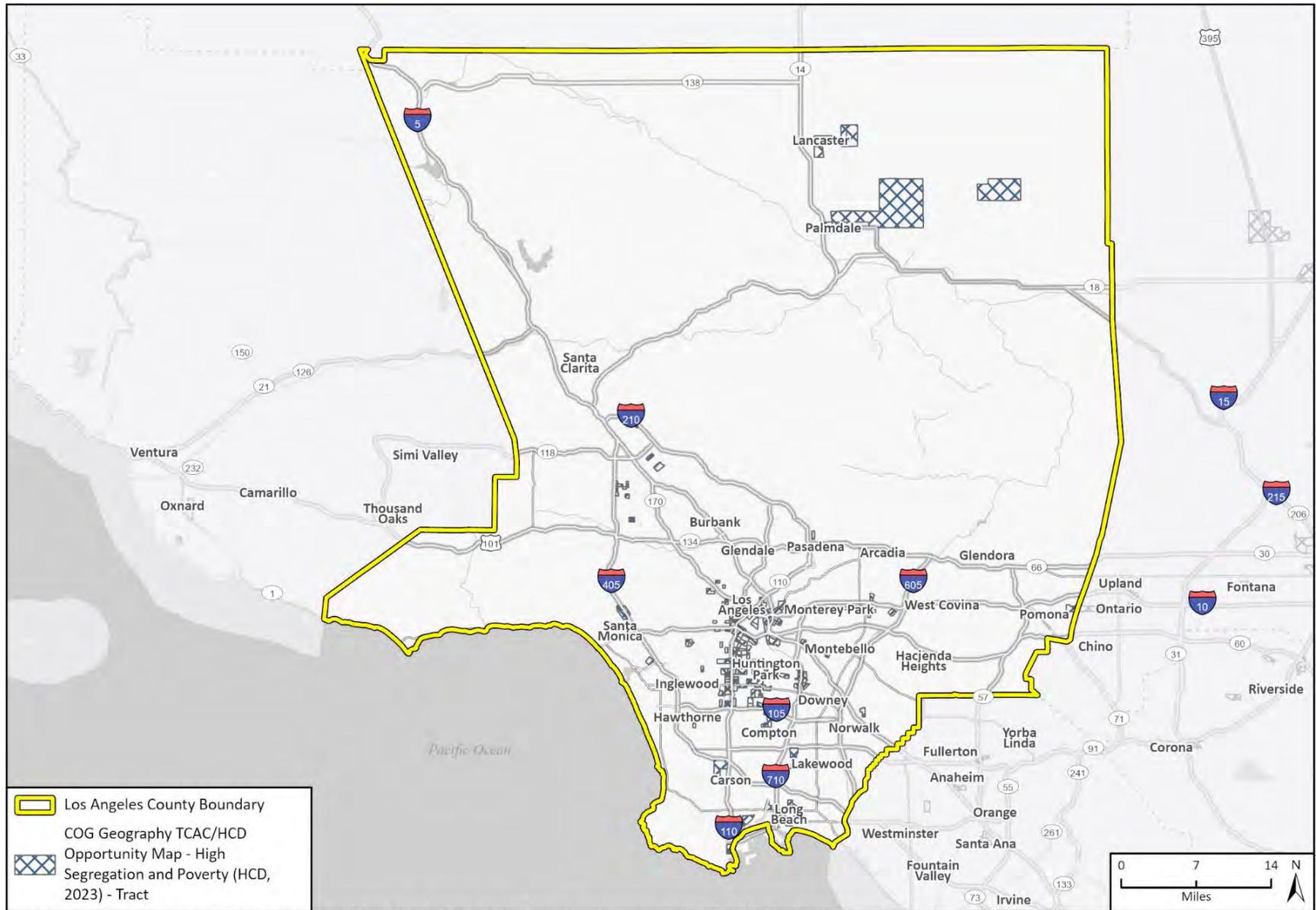
Areas of high segregation and poverty in Los Angeles County are concentrated in the center of the county, in Central Los Angeles, the northeastern part of the South Bay, and the Northwestern Gateway Cities (Figure D-12).

D.2.6 Poverty

Approximately nine percent of residents in West Covina are living below the poverty line. Census Tract 4062.01 has the highest poverty rate in the city (26 percent), followed by southern parts of the city (between 10 and 20 percent) (Figure D-13). Throughout the rest of the city poverty rates are below 10 percent. Census Tract 4062.01, which has the highest poverty rate in the city, also has the highest percentage of persons with a disability (Figure D-4) and the lowest median household income (Figure D-8). This census tract also has a higher percentage of renters compared to nearby areas within the city. Approximately 71 percent of households are renters in this census tract, compared to 20 to 40 percent throughout most of the city.

Los Angeles County has a higher poverty rate compared to West Covina, 14 percent. In Los Angeles County, the highest poverty rates are in the central part of the county and the city of Lancaster (Figure D-14). In parts of the cities of Los Angeles, Wilmington, and Long Beach more than 75 percent of residents are living below the poverty line. The western part of the San Fernando Valley, Westside Cities, and western and southern parts of the South Bay have low poverty rates compared to the rest of the county, below 10 percent.

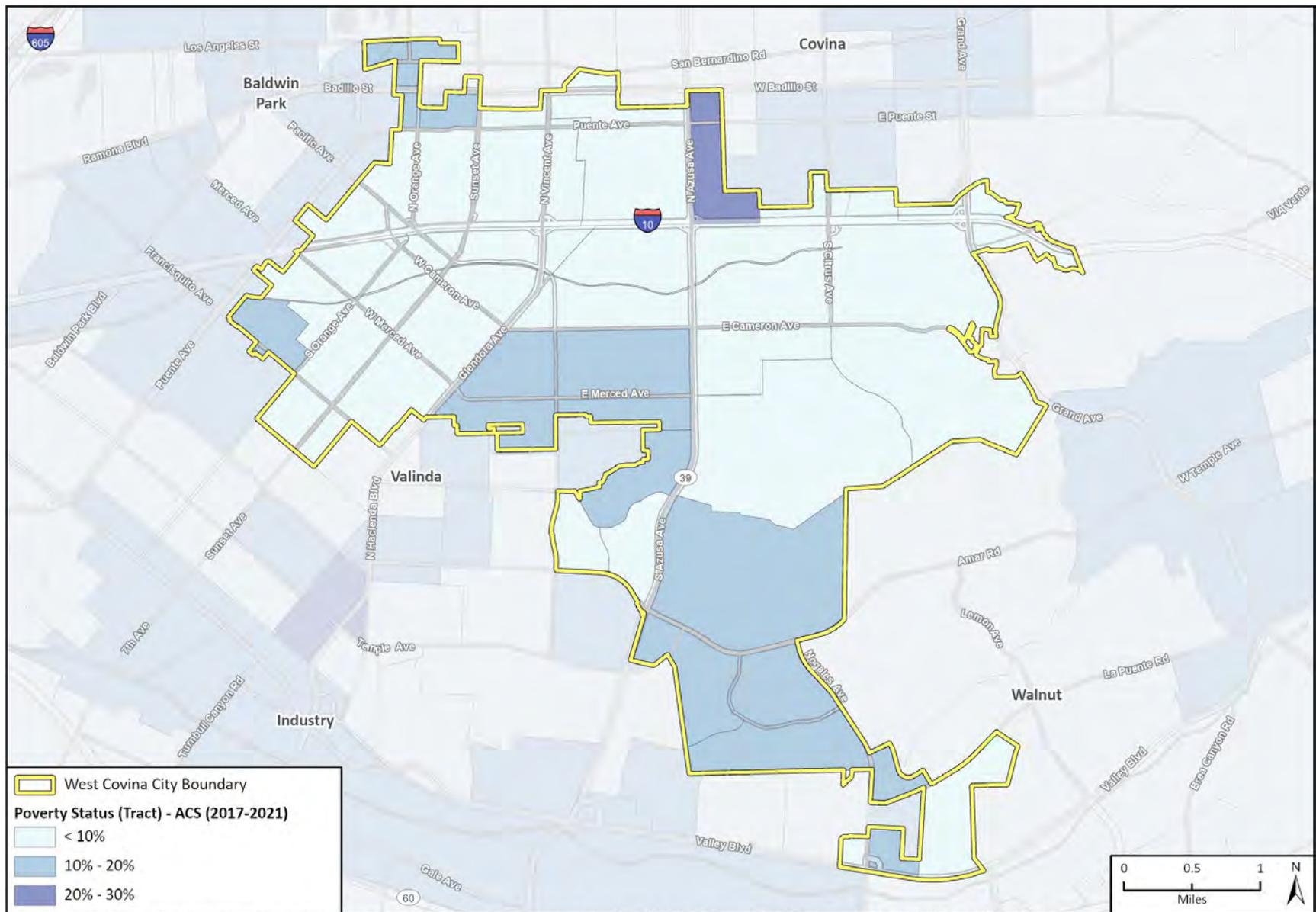
Figure D-12 Racially/Ethnically Concentrated Areas of Poverty – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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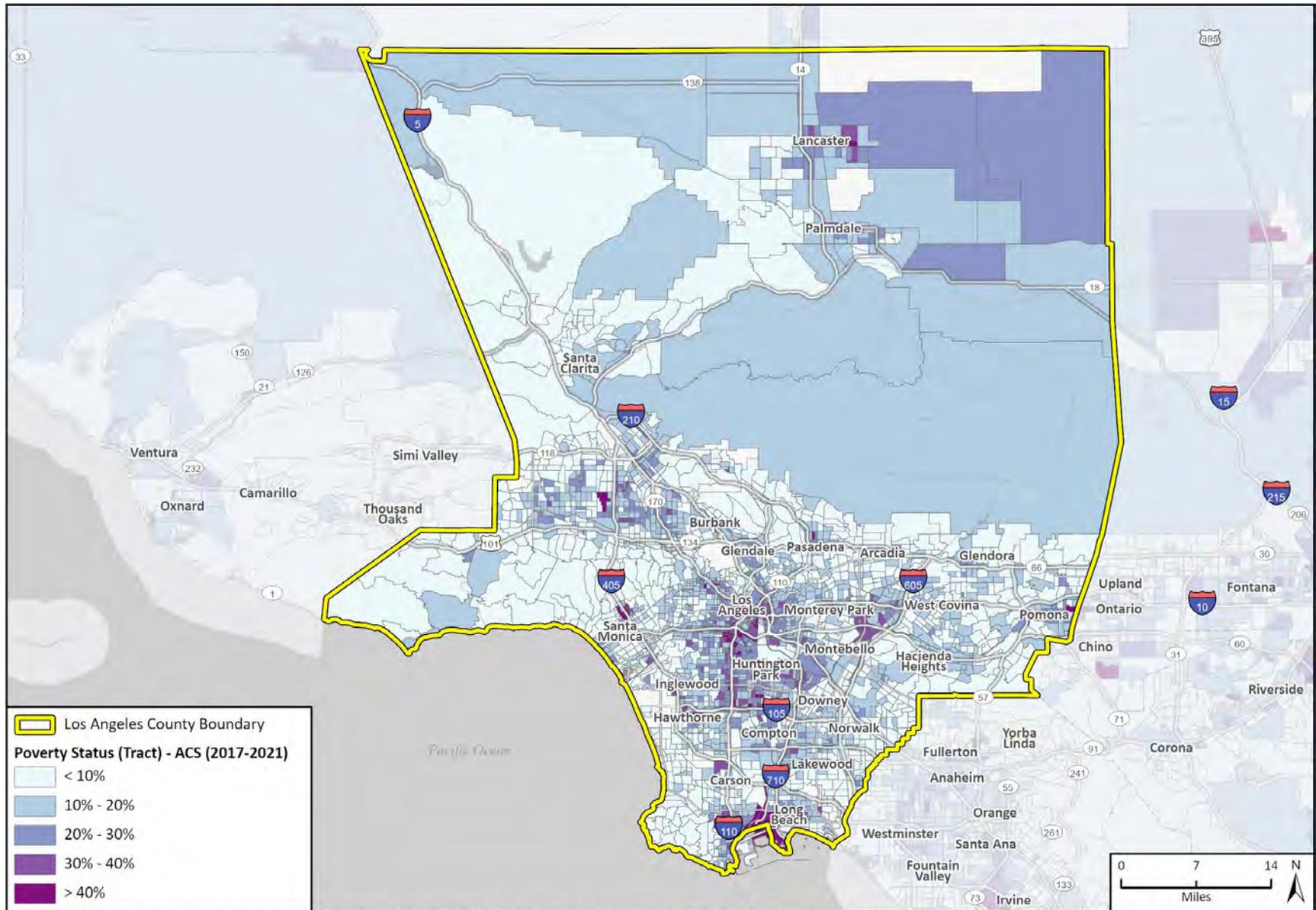
Figure D-13 Poverty Status – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-14 Poverty Status – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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D.2.7 Racially/Concentrated Areas of Affluence

According to the Housing and Community Development AFFH Guidance Memo, “segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices.” Therefore, both sides of the continuum must be examined. Racially Concentrated Areas of Affluence (RCAs) are defined as affluent, white communities.² According to a policy paper published by HUD, white residents are the most racially segregated group in the United States typically more affluent than majority non-white communities. In addition to having a higher median income, areas of affluence experience less overcrowding, less housing cost burden on renters, and are generally less susceptible to displacement compared to LMI areas.

HCD’s AFFH Data Viewer identifies RCAs as census tracts that have a white population that is 1.25 times higher than the Council of Governments (COG) region and a household median income 1.5 times higher than the AMI. There are no RCAs in West Covina, but the southern part of the city has a high concentration of non-White residents and low median household income.

In Los Angeles County RCAs are concentrated in the western half of the county, particularly in the Westside Cities, as well as cities in the southwestern part of the county.

Table D-2 compares the median household incomes of residents by race/ethnicity in West Covina and Los Angeles County. This table shows that in West Covina, Asian and Hispanic/Latino households have the highest median income (\$91,362 and \$85,330, respectively). Native American/Alaskan Native have the lowest median household income (\$57,000). These patterns indicate that there is not a significant correlation between race/ethnicity and median household income in West Covina, except perhaps for Native American/Alaskan Native households. In contrast, Los Angeles County as a whole appears to have a greater correlation between race/ethnicity and median household income. White and Asian households have the highest median household incomes (\$91,323 and \$83,252, respectively), while Native American/Alaskan Native, Hispanic/Latino, and Black/African American households have the lowest median household incomes (\$62,427, \$59,837, and \$51,259, respectively).

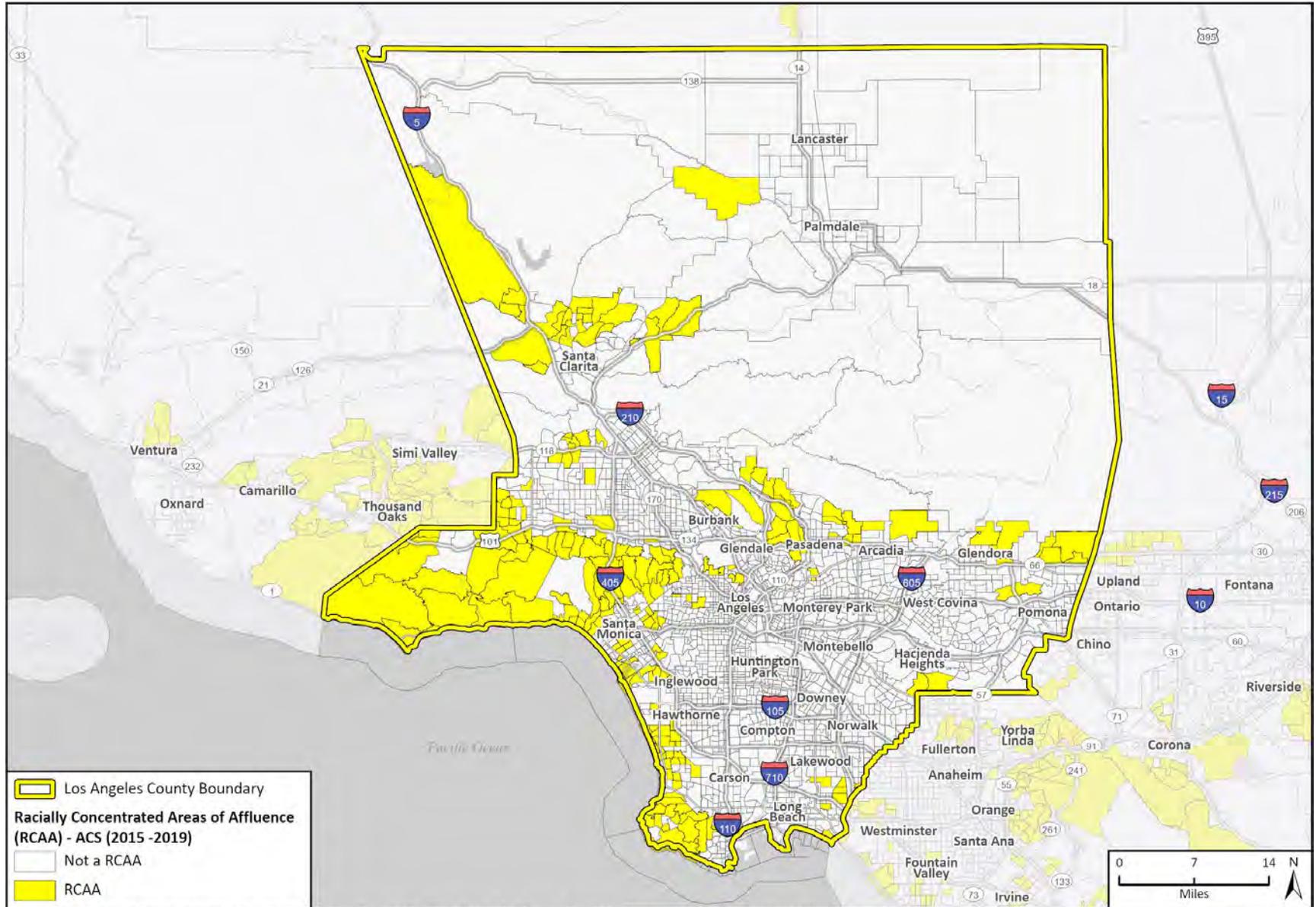
Table D-2 Median Household Income by Race – West Covina and Los Angeles County

Median Household Income	West Covina	Los Angeles County
Asian	\$91,362	\$83,252
Hispanic/Latino (of any race)	\$85,330	\$59,837
White Alone (not Hispanic)	\$79,909	\$91,323
Black/African American	\$75,131	\$51,259
Native Hawaiian/Pacific Islander	\$71,111	\$78,831
Native American/Alaskan Native	\$57,000	\$62,427
All Households	\$85,626	\$71,358

Source: U.S. Census ACS 2016-2020, Table B19013, B19013H

² Goatz, Damiano and Williams, 2019.
<https://www.huduser.gov/portal/periodicals/cityscpe/vol21num1/ch4.pdf>

Figure D-15 Racially Concentrated Areas of Affluence – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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D.3 Disparities in Access to Opportunity

D.3.1 Overview

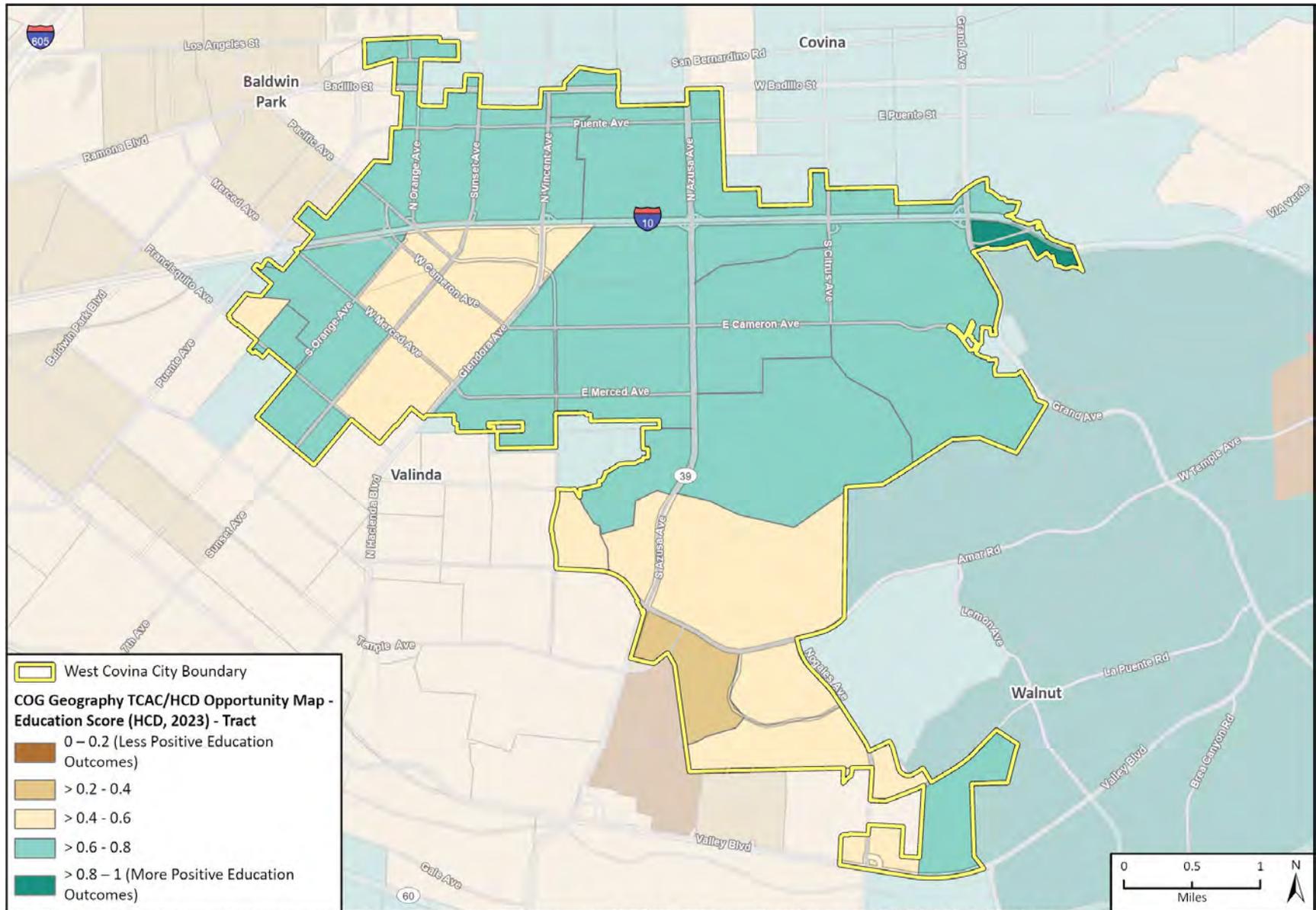
California housing law requires cities to analyze disparities in access to opportunity as part of the fair housing assessment. The California Tax Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) have developed maps showing access to various types of opportunities such as education, economic, transportation, and environmental indicators.

D.3.2 Educational Opportunity

The West Covina Unified School District (WCUSD) serves the majority of West Covina, while Covina-Valley Unified School District also serves portions of the city. As shown in Figure D-16, TCAC educational opportunity scores are mostly positive throughout the city. The lowest scores were reported in the southern part of the city and western part of the city.

Los Angeles County has a mix of education outcome scores (Figure D-17). More positive education outcomes are concentrated in western and eastern parts of the county, overlapping with areas with a higher percentage of White residents and higher median household incomes. Areas in the central and northeastern parts of the county have less positive education outcomes. The County AI describes overall school proficiency in the Urban County Area in relation to race and ethnicity. White and Asian residents generally have greater access to proficient schools, particularly in Santa Monica and Glendora, while Black and Hispanic residents living in Palmdale, Inglewood, and Montebello lived among schools with the lowest levels of proficiency within the County.

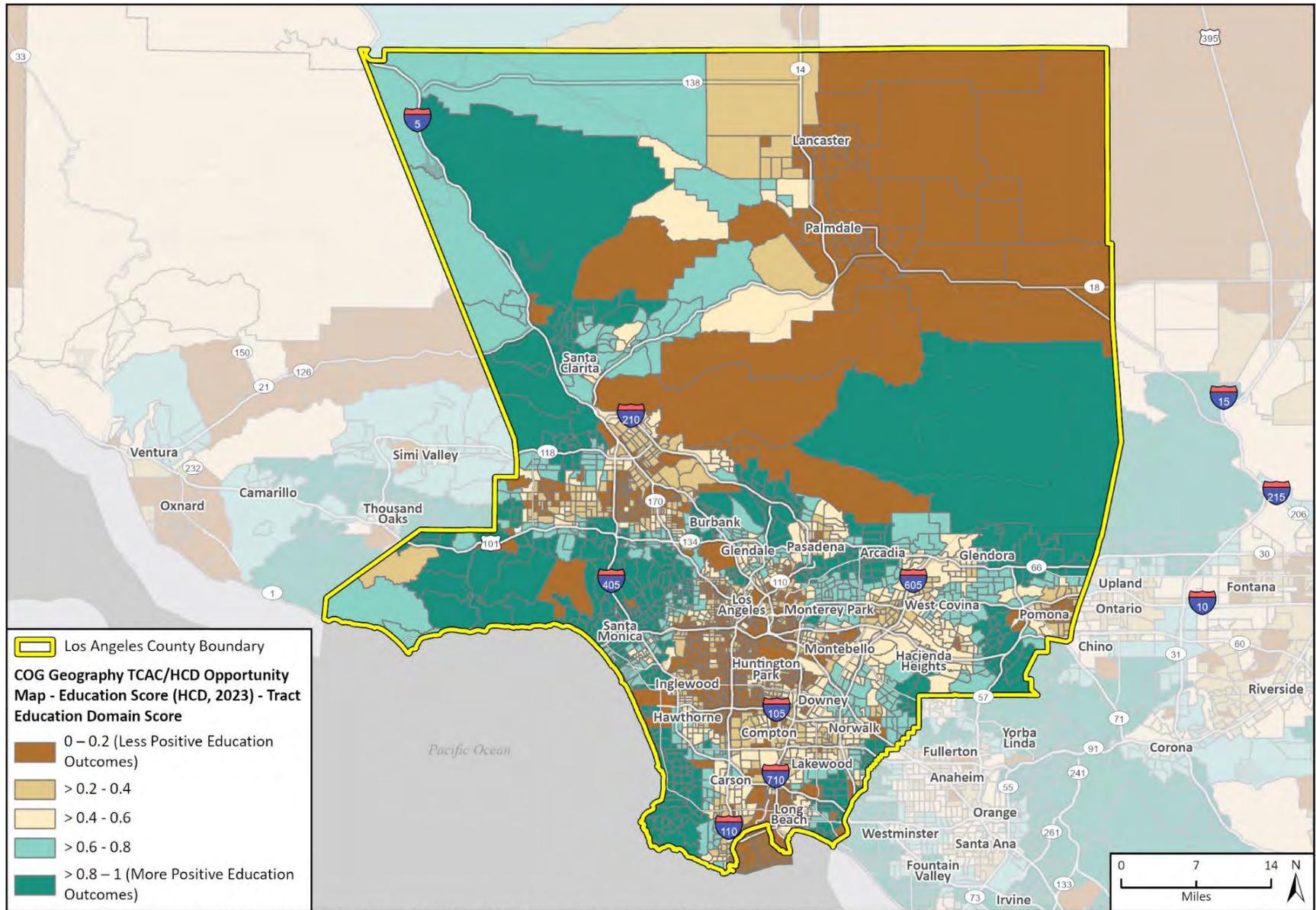
Figure D-16 TCAC Educational Opportunity Areas – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-17 TCAC Educational Opportunity Areas – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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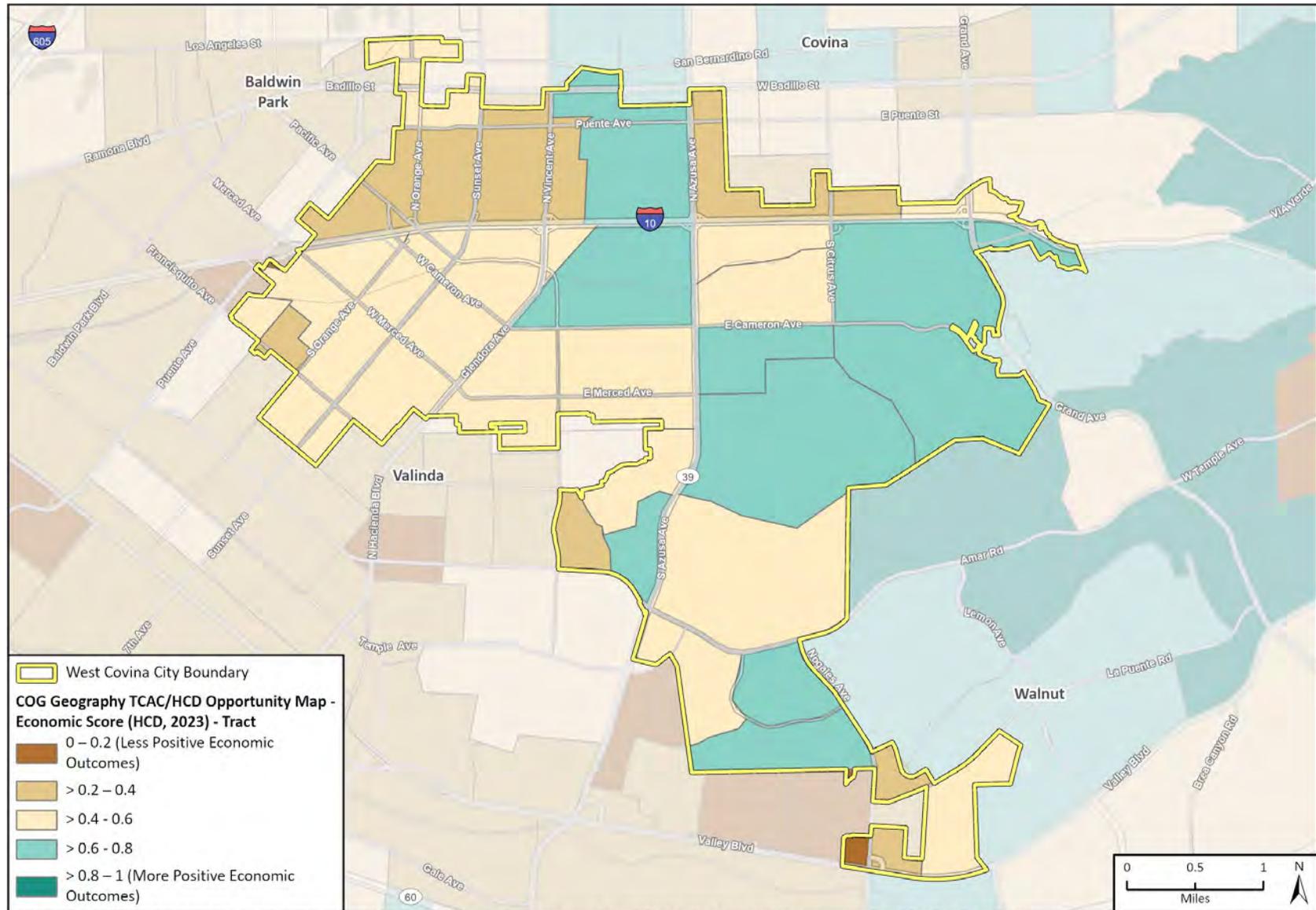
D.3.3 Economic Opportunity

TCAC economic opportunities are measured by census tract and compared to other census tracts within the same COG. They consider poverty, adult education, employment, job proximity, and median home values. A higher economic index score reflects more positive economic outcomes.

In West Covina, the eastern part of the city has the highest economic opportunity scores and the western part of the city has the lowest economic opportunity scores (Figure D-18).

In Los Angeles County, western and southeastern parts of the county, including in cities along in the coast in Westside and the South Bay, have the highest economic outcomes (Figure D-19). The northeastern part of the county, Santa Clarita Valley, San Fernando Valley, Central Los Angeles, Gateway Cities, and San Gabriel Valley have the least positive economic outcomes in the county. The County AI reported that economic opportunity scores for the Urban County area were similar for Whites, Black, and Asian/Pacific Islander while the score for Hispanics was slightly lower. However, labor market engagement index values were significantly higher for Whites and Asian/Pacific Islanders compared to African Americans and Hispanics.

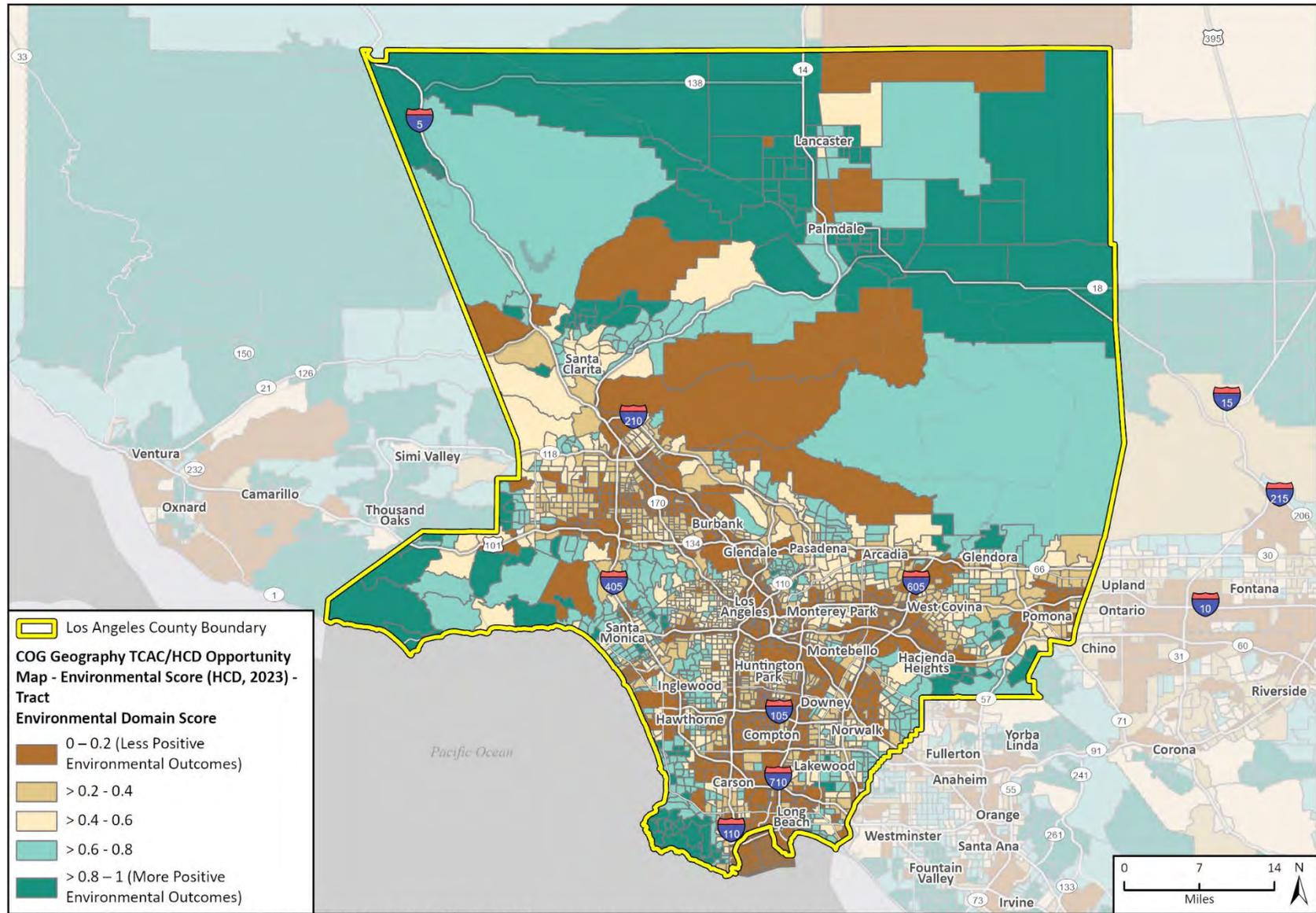
Figure D-18 TCAC Economic Opportunity – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-19 TCAC Economic Opportunity – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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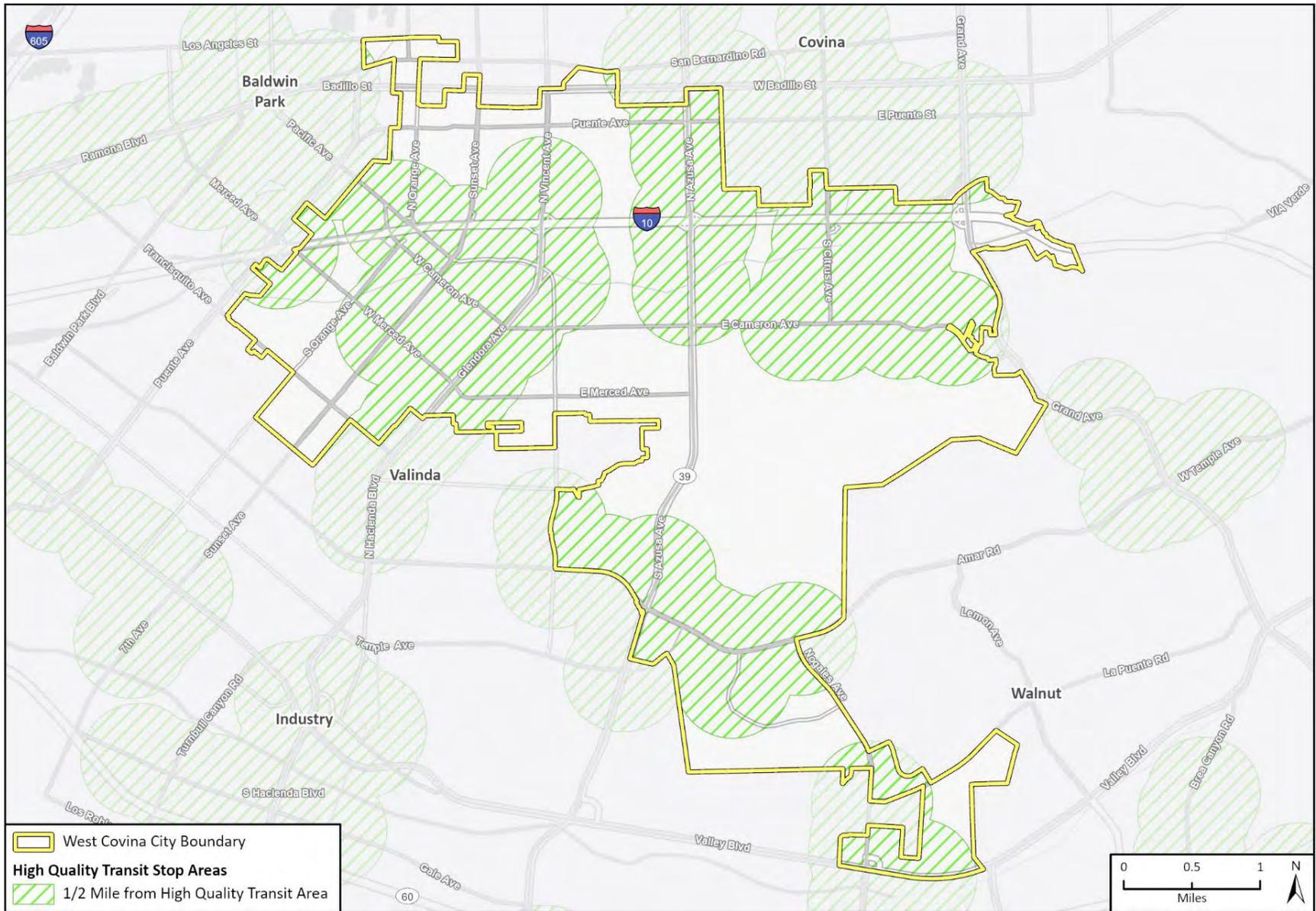
D.3.4 Transportation Opportunity

The City of West Covina is served by Foothill Transit and the Go West Shuttle and Dial-A-Services. Foothill Transit offers 14 fixed bus routes that pass through West Covina operating seven days a week between 4:10 am and 12:00 am. These routes connect West Covina to adjacent cities and cities throughout the region, including Los Angeles, El Monte, Montclair, and the City of Industry. The Go West Shuttle consists of three fixed bus routes throughout the city operating from 6:30 am to 7:00 pm Monday through Friday. The Go West Shuttle does not operate on the weekend. Dial-A-Ride service through Go West Shuttle offer curb-to-curb transportation for seniors (aged 55 and older) and Americans with Disabilities Act-certified patrons within the city limits and up to three miles outside city limits for medical appointments.

Residents in West Covina have moderate access to public transportation and similar rates of transit ridership compared to other nearby cities. West Covina received an average AllTransit performance score of 6.3 which is based on a moderate combination of trips per week and number of jobs accessible by transit. According to ACS estimates, 84 percent of workers in West Covina drive alone to work, 11 percent carpool, one percent use public transportation, and less than one percent commute through other means, such as walking or biking.

As shown in Figure D-20, areas of the city within half a mile of a high-quality transit stop, (transit stop with an existing rail or bus rapid transit station, ferry terminal serviced by bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods) are concentrated in northern, western, and southern portions of the city. According to the County AI, the transit trip index for the Urban County area shows little disparity among the racial or ethnic classes.

Figure D-20 West Covina Transit Service Map



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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D.3.5 Environmental Opportunity

Environmental opportunity scores are related to potential exposure to harmful toxins and are based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins. A higher score means less exposure to toxins.

In West Covina, the highest environmental opportunity scores (0.5 – 0.75) are found in the northern portion of the city (Figure D-21) while most areas show lower scores (less than 0.5). Overall, most of the city has less positive environmental outcomes. The CalEnviroScreen map for the city of West Covina identifies the degree to which communities are considered burdened by pollution. The lowest environmental scores are in the western and northern parts of the city (Figure D-22). These areas have a high level of pollution burden due to traffic impacts, cleanup sites, and children’s lead risk from housing. The entire city has high levels of pollution burden from particulate matter less than 2.5 micrometers in diameter, diesel particulate matter, and drinking water contaminants.

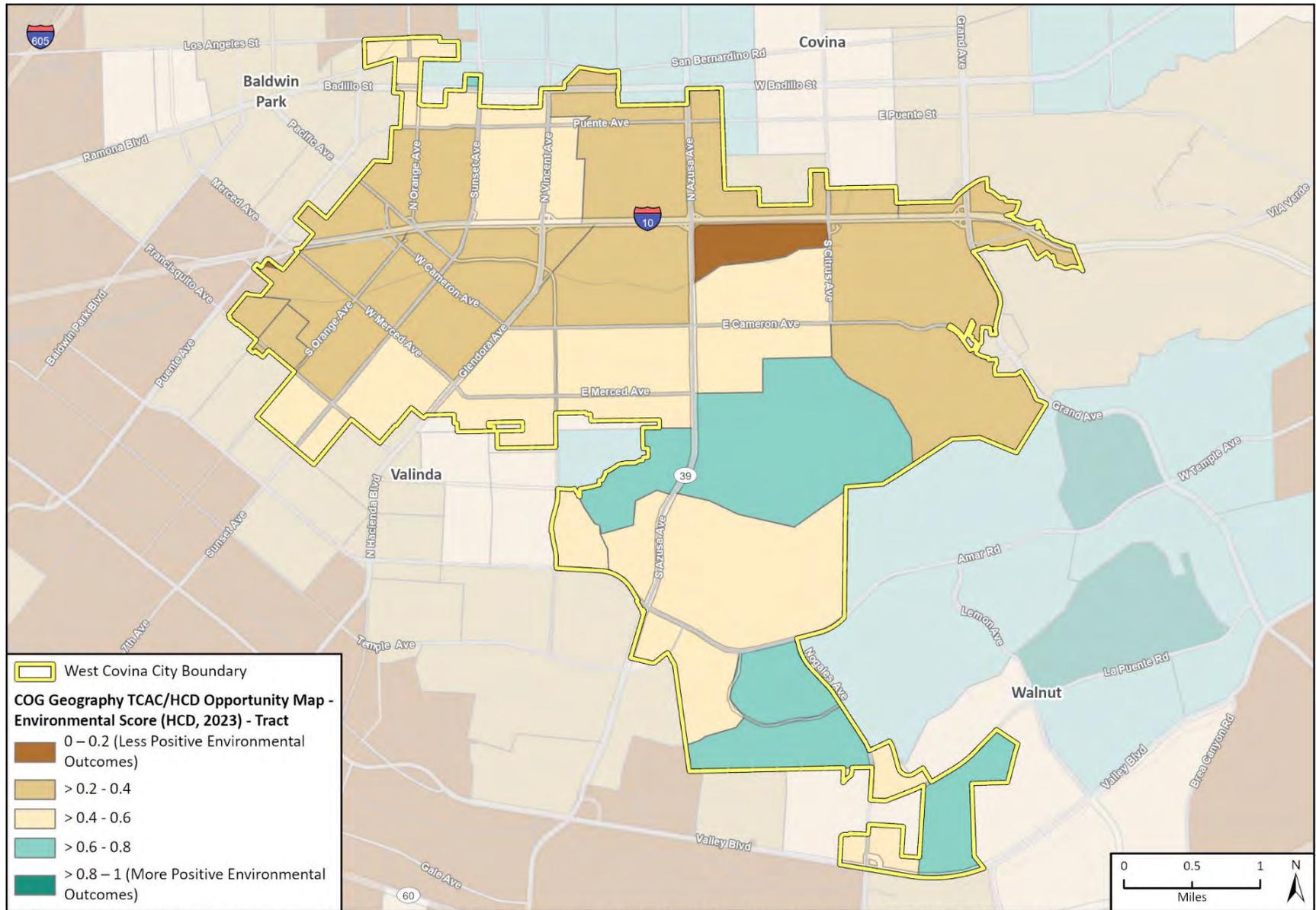
In the context of the larger Los Angeles County, environmental opportunity scores in West Covina are similar to adjacent areas to the east, west and south but lower than areas to the north (Figure D-23). Los Angeles County has a range of CalEnviroScreen percentile scores (Figure D-24). According to the CalEnviroScreen map, areas most burdened by pollution are in the northeastern part of the county and the central, urbanized areas, including the San Fernando Valley, Central Los Angeles, Gateway Cities, and San Gabriel Valley.

D.3.6 Disadvantaged Communities

Senate Bill 1000 (SB 1000) requires cities with identified disadvantaged communities (DACs) to include environmental justice goals and policies in the General Plan. Per SB 1000, the California EPA uses CalEnviroScreen, a mapping tool to identify disadvantaged communities. CalEnviroScreen examines various indicators to characterize pollution and socioeconomic factors. As seen in Figure D-25 below, portions of West Covina along the I-10 freeway are classified as disadvantaged communities.

As seen in Figure D-26, disadvantaged communities in Los Angeles County are concentrated in the San Fernando Valley, Central Los Angeles, Gateway Cities, and southern part of the San Gabriel Valley.

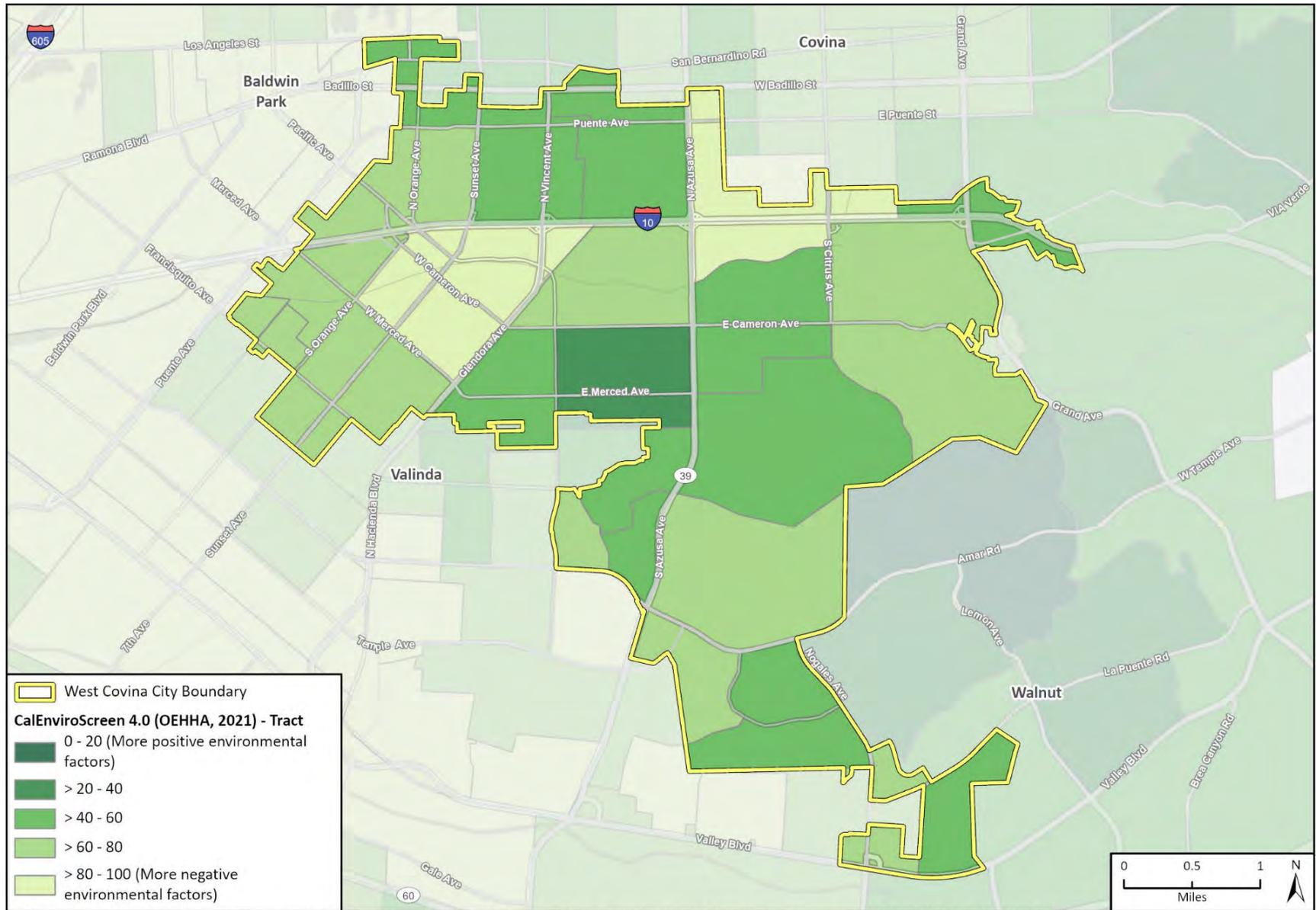
Figure D-21 TCAC Environmental Opportunity – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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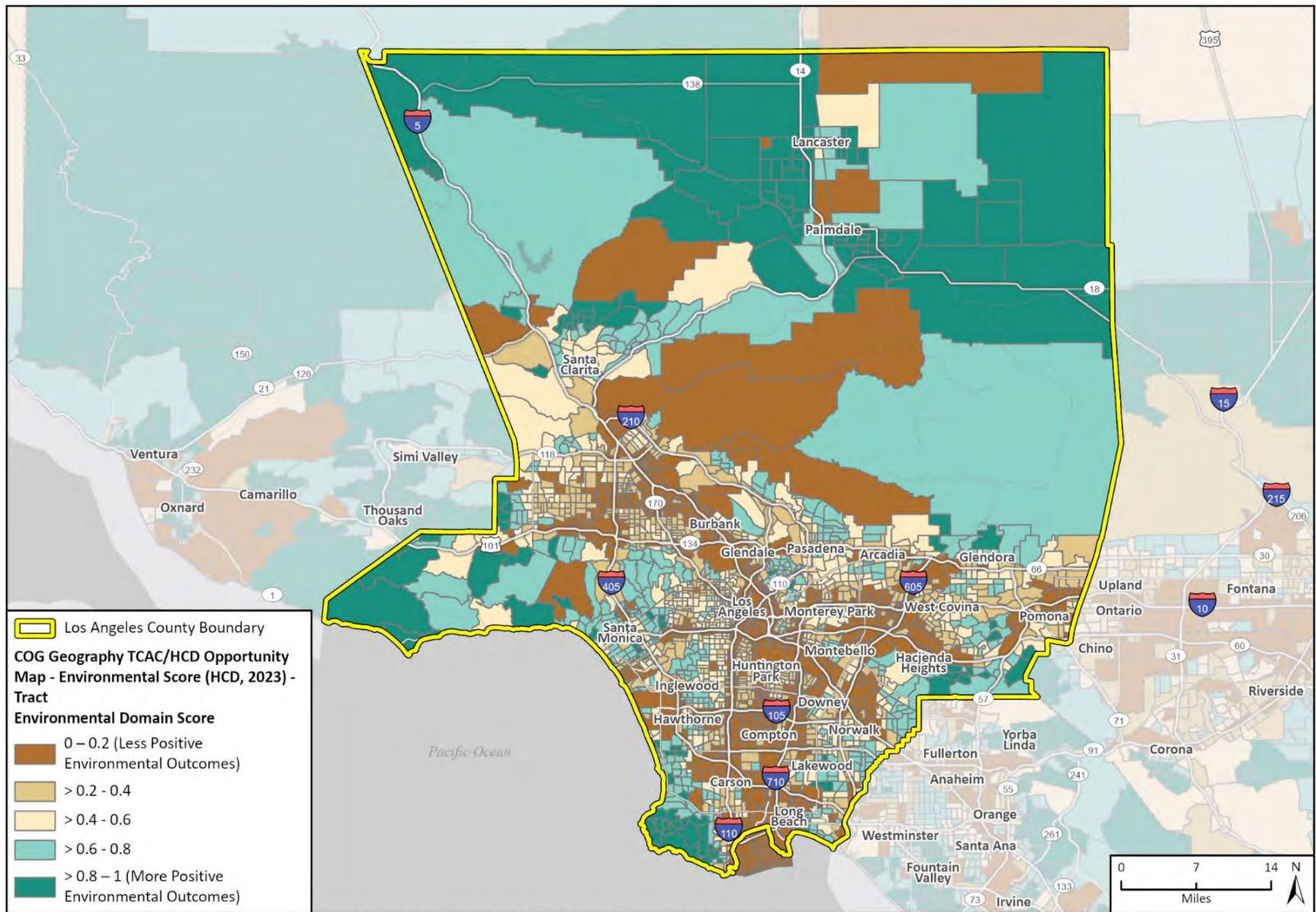
Figure D-22 CalEnviroScreen Percentile Score – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHH, FEMA

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AFFH - City Basemap 8.5 x 11

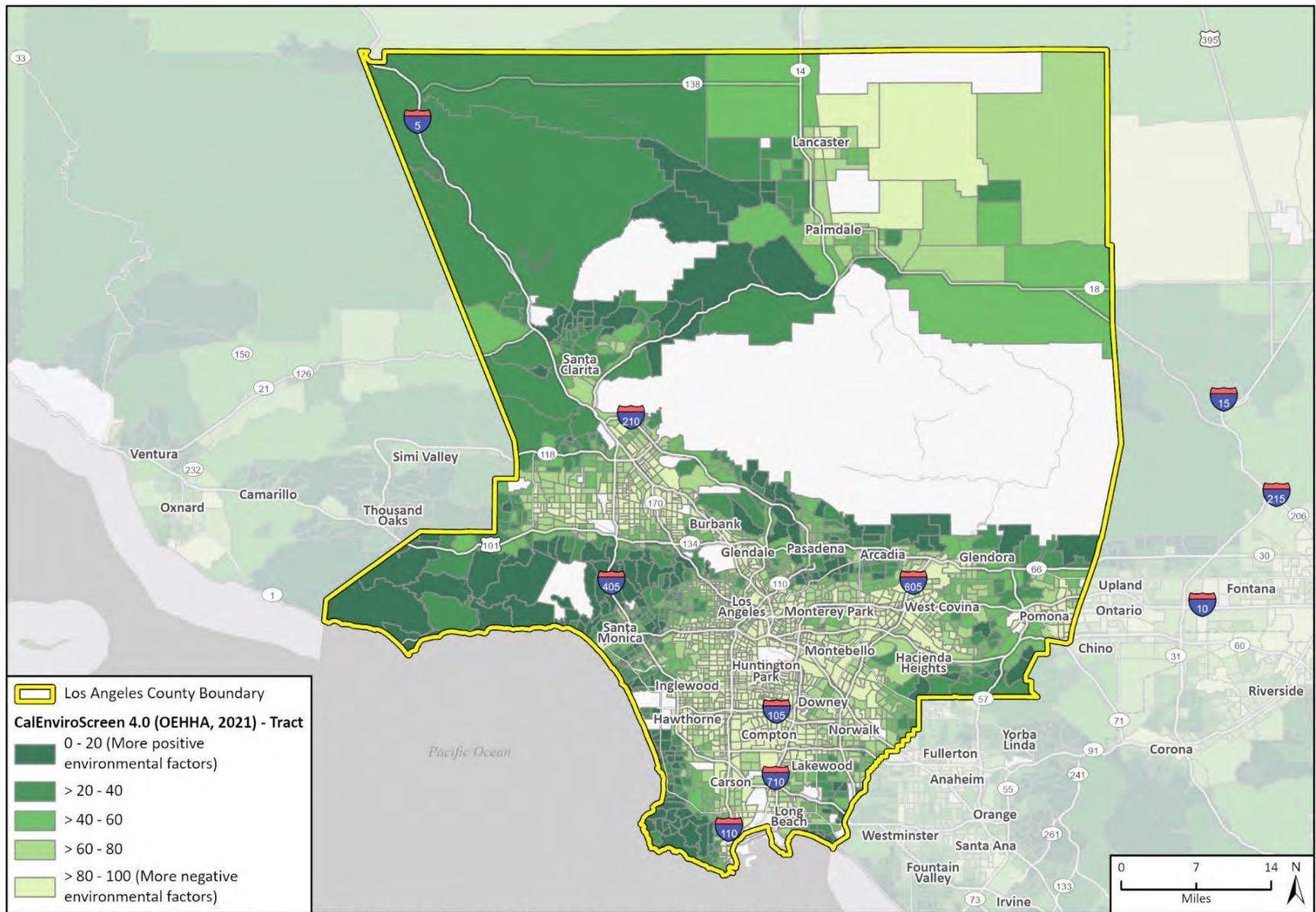
Figure D-23 TCAC Environmental Opportunity – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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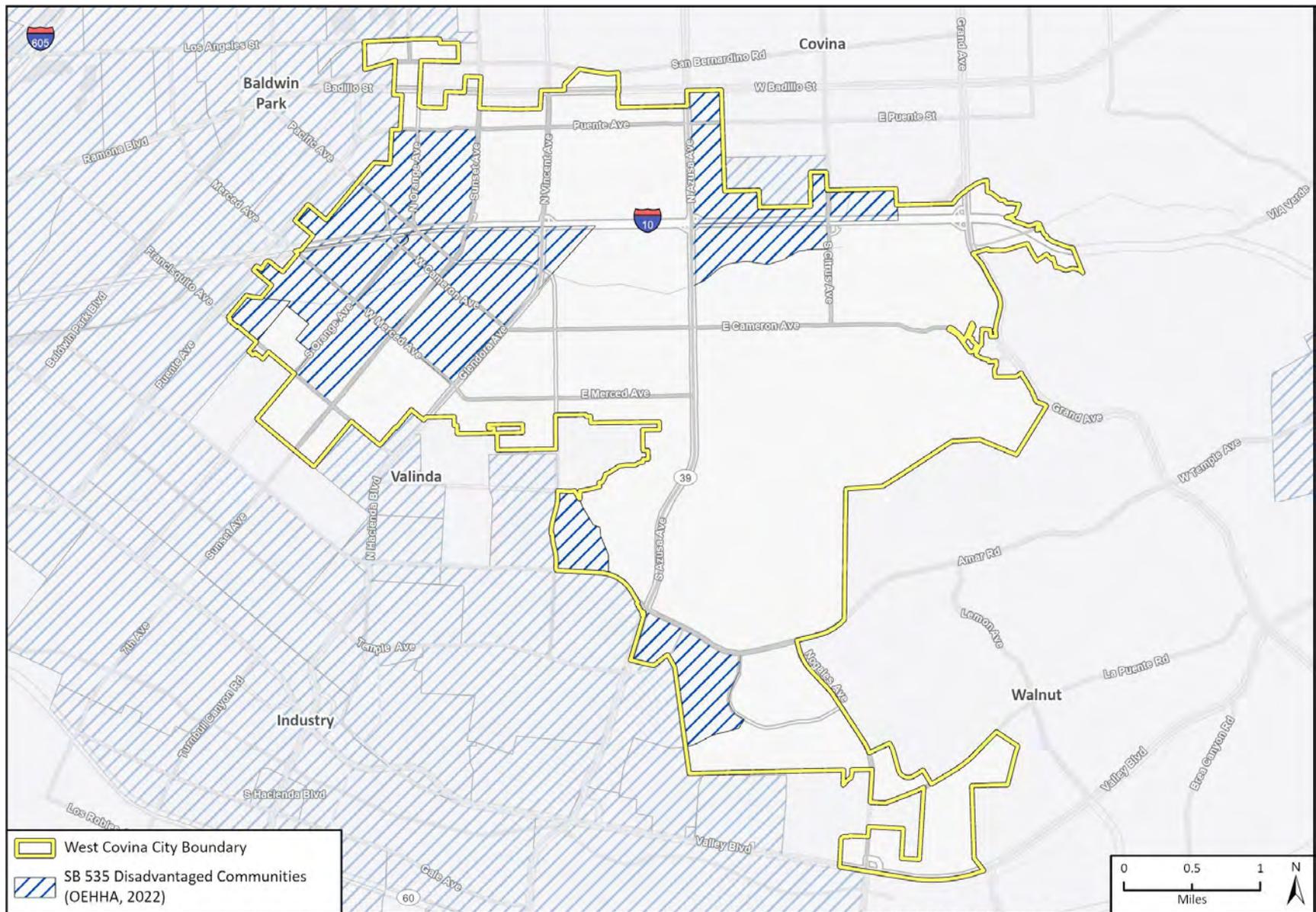
Figure D-24 CalEnviroScreen Percentile Score – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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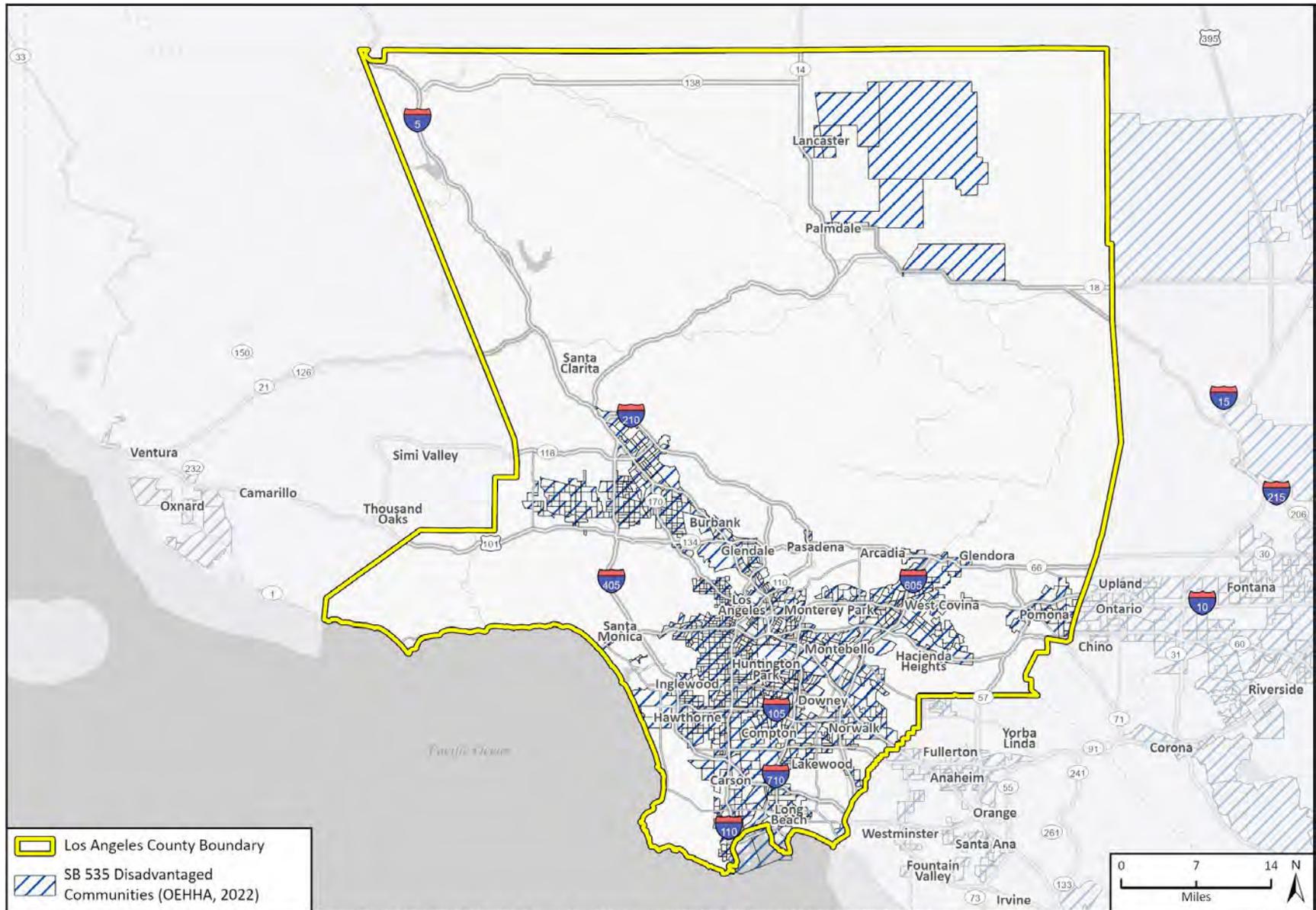
Figure D-25 Disadvantaged Communities – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-26 Disadvantaged Communities – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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D.4 Disproportionate Housing Needs and Displacement Risk

The AFFH Rule Guidebook (24 C.F.R. §5.152) defines “disproportionate housing needs” as “a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.” The analysis is completed by assessing cost burden, overcrowding, and substandard housing. In addition, this analysis examines homelessness and displacement risk.

D.4.1 Cost Burden (Overpayment)

A household is considered cost-burdened if it spends more than 30 percent of its income on housing costs, including utilities. Reducing housing cost burden can also help foster more inclusive communities and increase access to opportunities for persons of color, persons with disabilities, and other protected classes.

Overpayment is a problem for many West Covina residents, particularly lower-income households. According to recent HUD CHAS estimates, approximately 5,505 renter households (50 percent of all renters) and 6,215 owner households (32 percent of all owners) were paying more than 30 percent of income for housing (Table D-3). The highest rates of overpayment occur among very low-income and extremely low-income households. The impact of housing overpayment on lower-income households is particularly significant for special needs populations – seniors, persons with disabilities, and female-headed households with children.

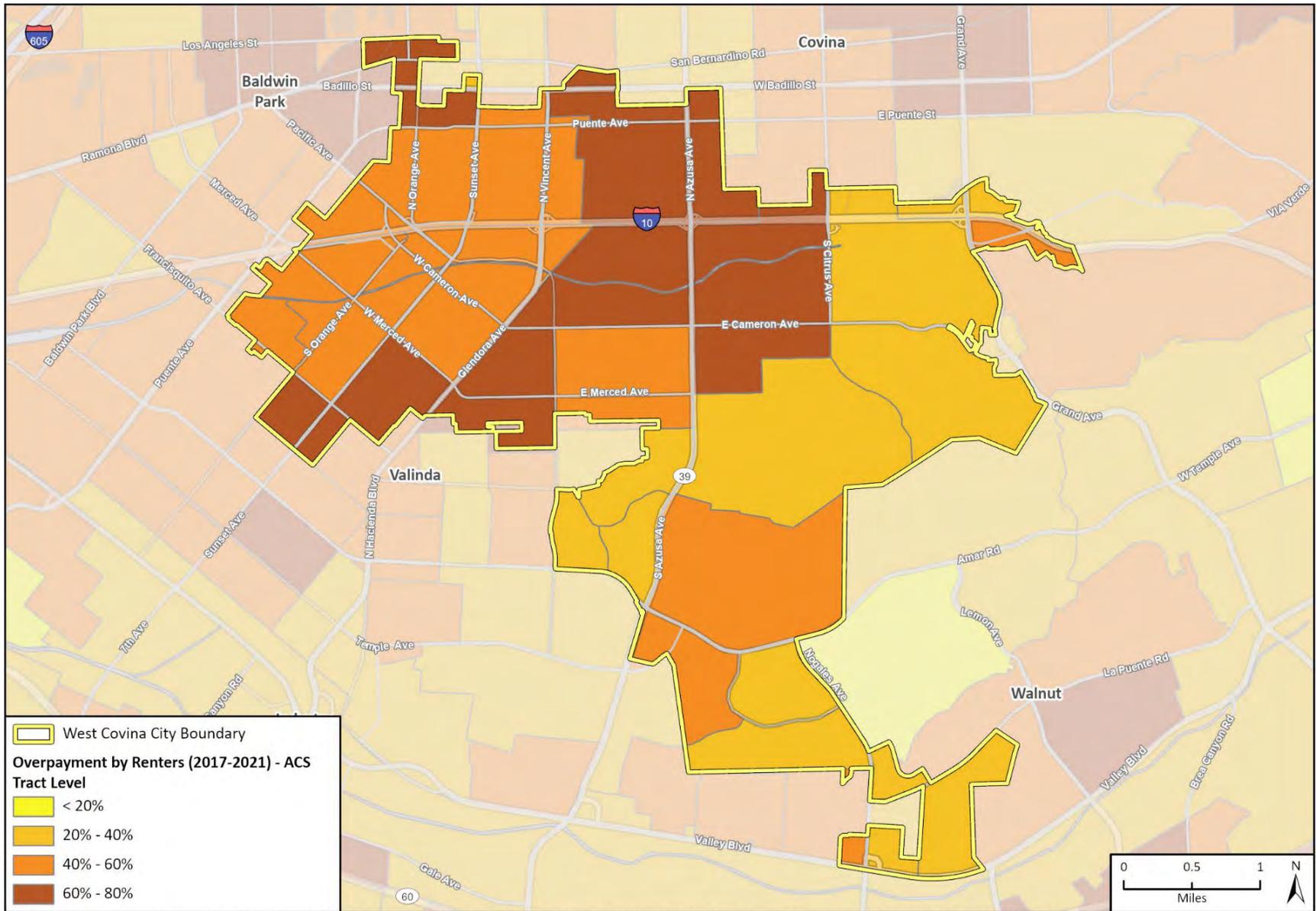
Table D-3 Cost Burden by Tenure and Income Category – West Covina

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	1,970	1,760	2,300
Household Income >30% to less-than or= 50% HAMFI	1,810	1,175	2,045
Household Income >50% to less-than or= 80% HAMFI	1,355	255	2,150
Household Income >80% to less-than or= 100% HAMFI	255	15	1,275
Household Income >100% HAMFI	115		3,175
Total	5,505	3,205	10,945
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	965	805	1,305
Household Income >30% to less-than or= 50% HAMFI	1,100	760	1,690
Household Income >50% to less-than or= 80% HAMFI	1,850	755	3,180
Household Income >80% to less-than or= 100% HAMFI	955	140	2,145
Household Income >100% HAMFI	1,345	175	11,245
Total	6,215	2,635	19,570

As shown in Figure D-27, overpayment among renters is most prevalent in the northern and western portions of the city where more than 60 percent of renters are overpaying for housing in some census tracts. When compared to conditions in other areas of Los Angeles County (Figure D-28) overpayment among West Covina renters appears to be similar to the rest of the county. Overpayment by renters is particularly high in the northwestern part of the county which overlaps with areas that are predominantly Hispanic/Latino, have a higher disability rate (Figure D-4), and a higher percentage of older housing units.

Overpayment among West Covina homeowners ranges from 20 percent to 60 percent in most portions of the city. Higher overpayment rates of 40 percent to 80 percent are seen throughout the city, and particularly prevalent in the eastern neighborhoods (Figure D-29). Eastern areas of the city are also predominantly Hispanic/Latino, have a higher disability rate (Figure D-4), higher percentage of children in female-head, single-parent households (Figure D-6). Rates of overpayment among homeowners in Los Angeles County are similar to West Covina, primarily ranging from 20 to 60 percent (Figure D-30). Areas with the highest rate of overpayment among homeowners are scattered throughout the most urban parts of the county.

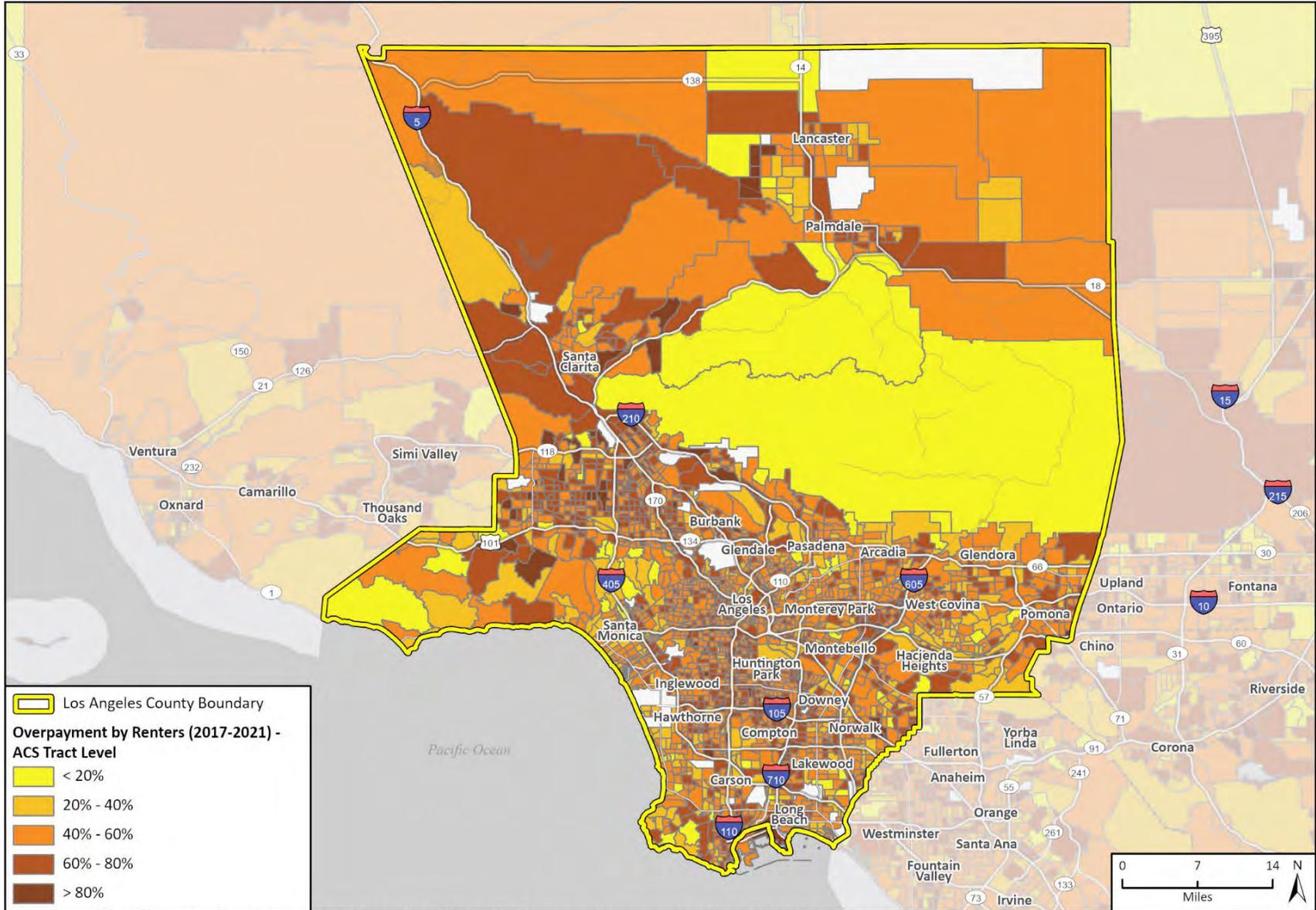
Figure D-27 Renters Overpaying for Housing – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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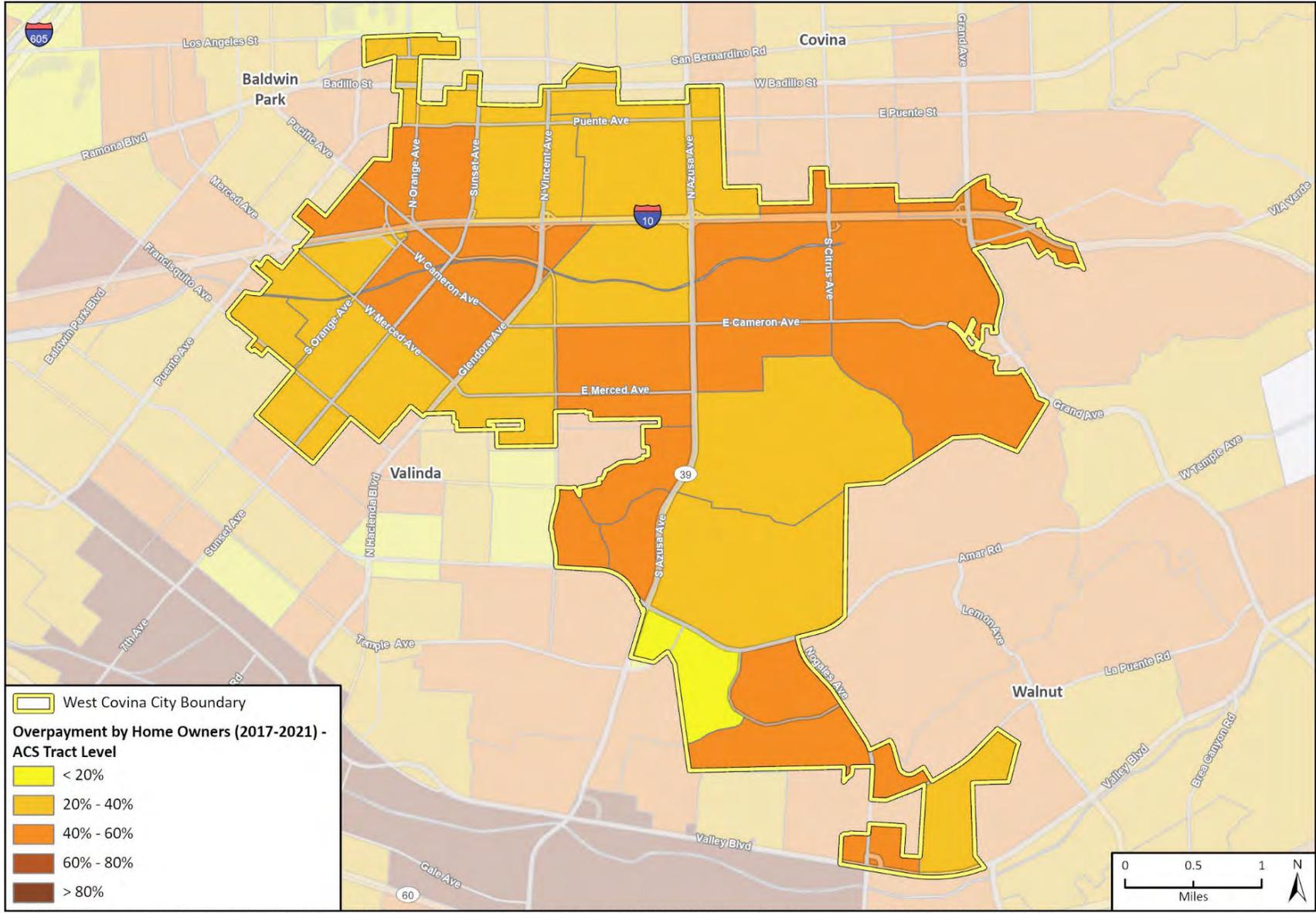
Figure D-28 Renters Overpaying for Housing – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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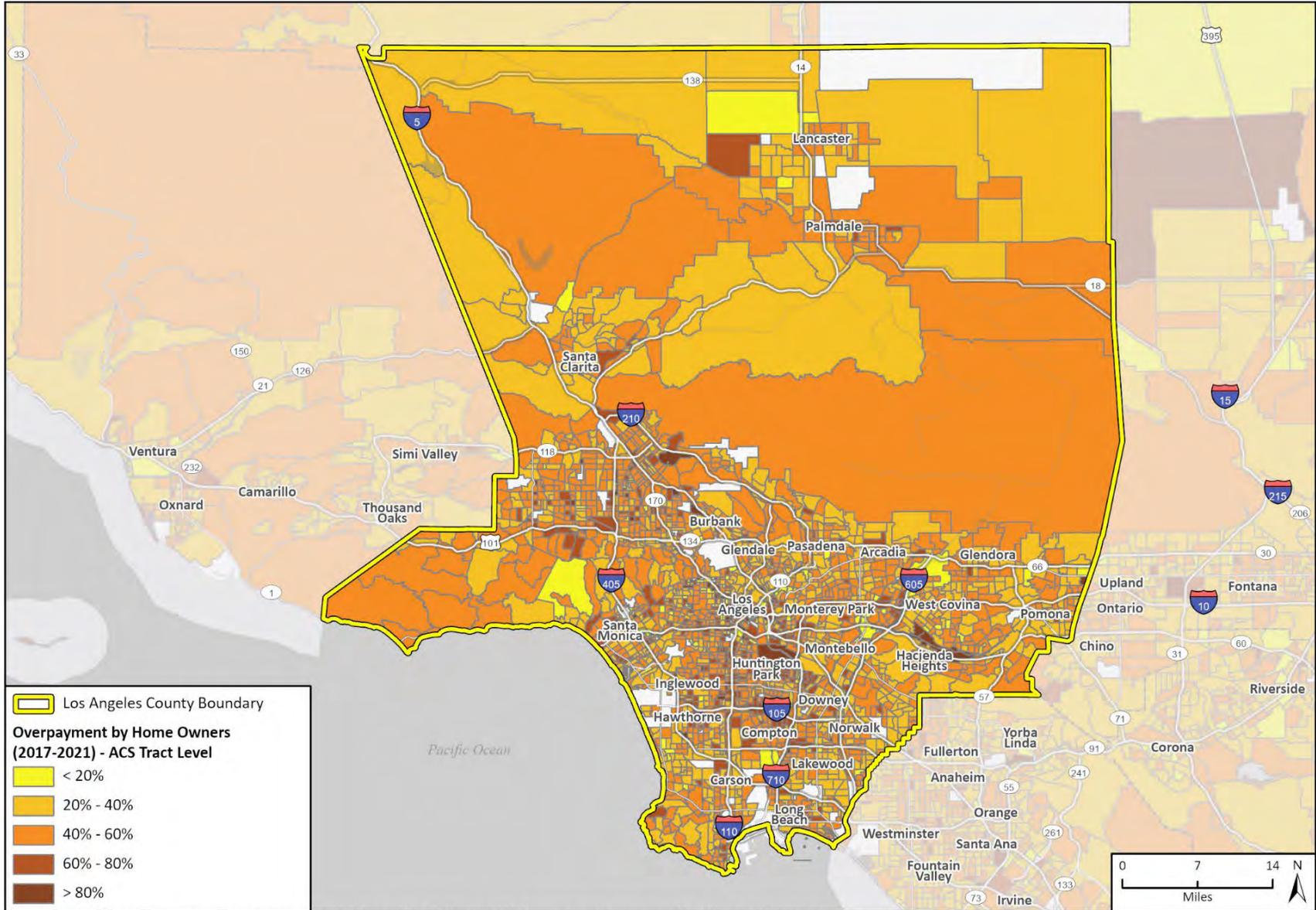
Figure D-29 Homeowners Overpaying for Housing – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-30 Homeowners Overpaying for Housing – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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The problems of overpayment are addressed through programs in the Housing Plan (Chapter 2) including 1.2 – Monitor and Preserve Affordable Housing, 2.1 – Acquisition and Rehabilitation, 2.2 – Support Production of Affordable Housing, 2.3 – Tenant Protections and Support, 3.1 – Review and Update the Development Review Process , 3.2 – Accessory Dwelling Units, 4.1 - Fair Housing, 4.2 – Housing for Persons with Special Needs, 4.3 – Homeless Assistance and Housing, 5.1 – Ensure Adequate Sites to Accommodate the RHNA, and 5.2 – Encourage Lot Consolidation and Infill.

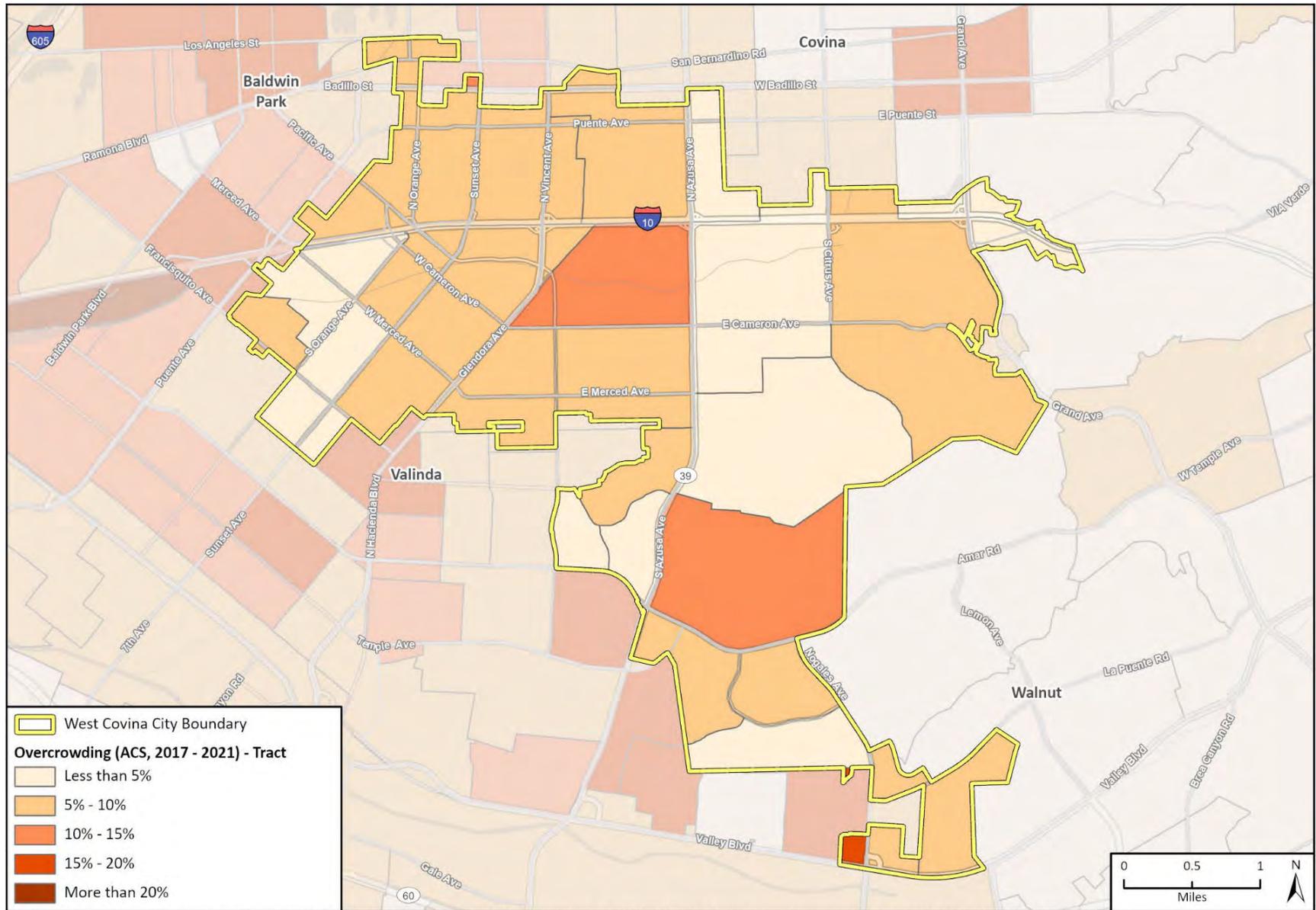
D.4.2 Overcrowding

“Overcrowding” is defined as a housing unit occupied by more than 1.01 persons per room (excluding kitchens, porches, and hallways). A unit with more than 1.51 occupants per room is considered “severely overcrowded.” The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units. Overcrowding is also related to overpayment, because households may not be able to afford a large enough home to accommodate their needs. Overcrowding can lead to a variety of other problems such as lower educational performance among children, psychological stress, and adverse health impacts.

In West Covina, some neighborhoods in the southern and western portions of the city have overcrowding rates of 12 to 20 percent while the central and eastern portions of the city have overcrowding rates less than 12 percent (Figure D-31). When viewed in the context of Los Angeles County, overcrowding in West Covina is generally similar to adjacent cities (Figure D-32). Areas with the highest rates of overcrowding are concentrated in the San Fernando Valley, the western part of the Gateway Cities, and the San Gabriel Valley.

The problems of overcrowding are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Programs 1.2 – Monitor and Preserve Affordable Housing, 2.1 – Acquisition and Rehabilitation, 2.2 – Support Production of Affordable Housing, 2.3 – Tenant Protections and Support, 3.1 – Review and Update the Development Process, 3.2– Accessory Dwelling Units, 4.1 - Fair Housing, 4.2 – Housing for Persons with Special Needs, 4.3 –Homeless Assistance and Housing, , 5.1 – Ensure Adequate Sites to Accommodate the RHNA, and 5.2 – Encourage Lot Consolidation and Infill.

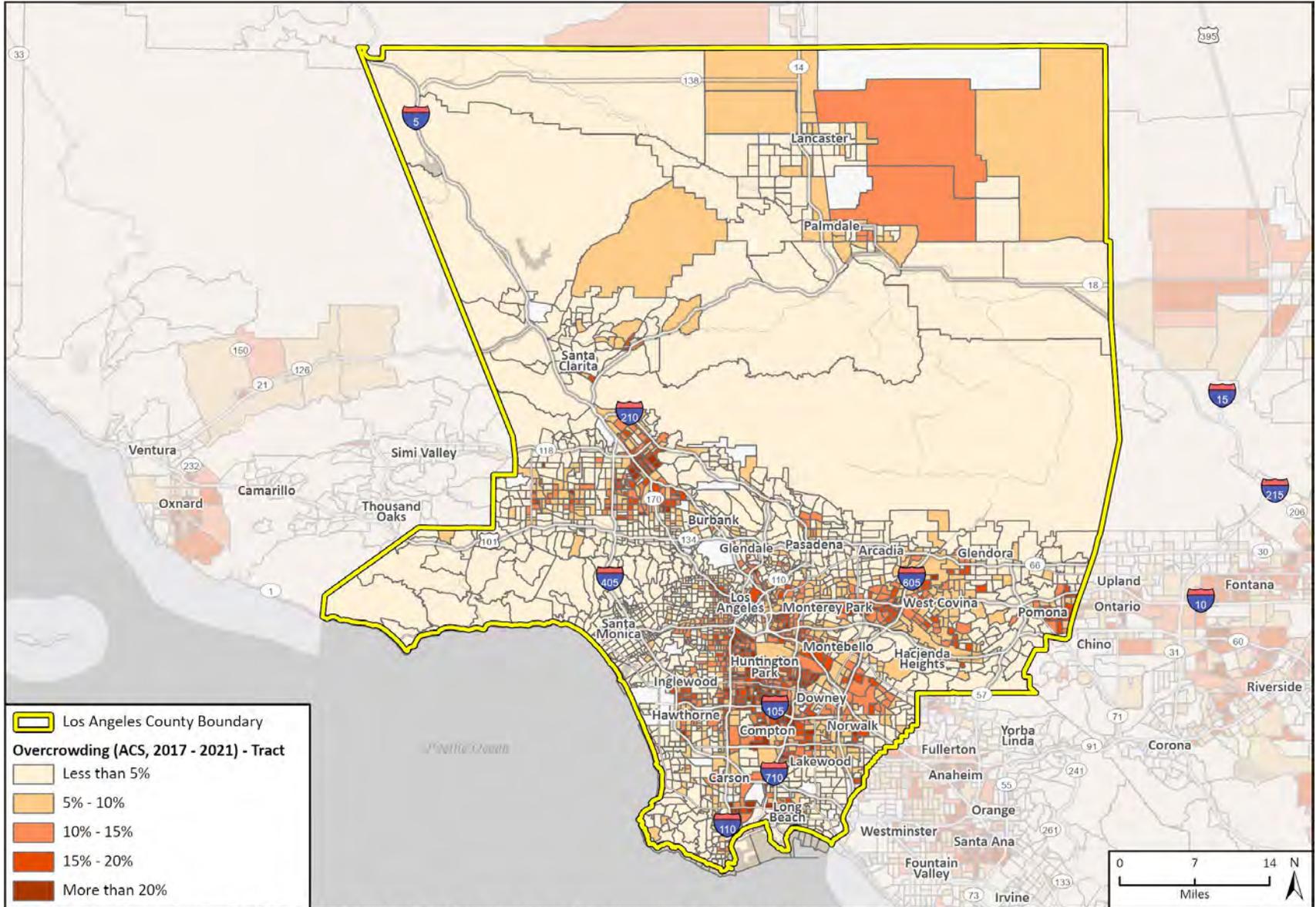
Figure D-31 Overcrowded Households – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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AFFH - City Basemap 8.5 x 11

Figure D-32 Overcrowded Households – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

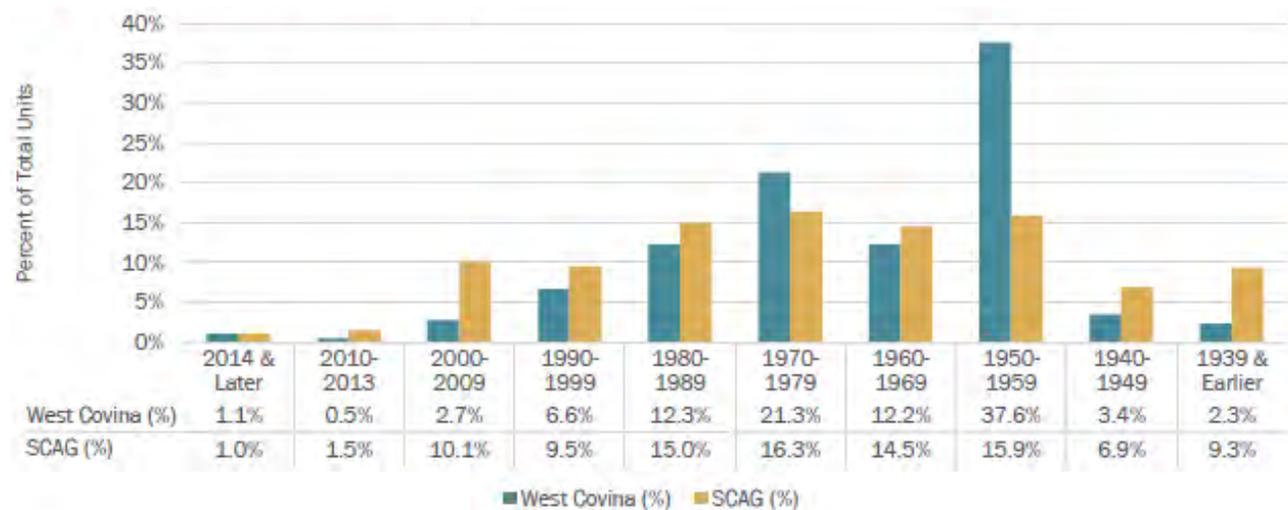
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D.4.3 Substandard Housing

The age of a housing unit is often an indicator of housing conditions. Housing units without proper maintenance can deteriorate over time. Housing units built before 1980 are the most likely to need rehabilitation and to have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children and pregnant women when it peels off walls or is pulverized by windows and doors opening and closing. Also, older units may not be built to current building standards for fire and earthquake safety.

The age of housing units in West Covina compared to the SCAG region as a whole is shown in Figure D-33. This chart indicates that about 80 percent of housing units in West Covina were constructed before 1980. This suggests that there is likely to be a need for maintenance and rehabilitation, including remediation of lead-based paint, for a substantial number of housing units in the city. A general reconnaissance of older neighborhoods in the City suggests that between 2 and 3 percent of the City’s housing stock is in need of repair, while fewer than a dozen homes may be in need of replacement. The Housing Plan includes Program 1.1 – Housing Preservation to provide funding assistance to low- and moderate-income homeowners for home repairs.

Figure D-33 Age of Housing Units – West Covina vs. SCAG Region



D.4.4 Homelessness

Homelessness is a continuing problem throughout California and urban areas nationwide. During the past two decades, an increasing number of individual persons have remained homeless year after year and have become the most visible of all homeless persons. Other persons (particularly families) have experienced shorter periods of homelessness. However, they are often replaced by other families and individuals in a seemingly endless cycle of homelessness.

The 2022 Homeless Count conducted by the Los Angeles Homeless Services Authority (LAHSA) estimated that there were approximately 69,144 homeless persons in Los Angeles

County in February of 2022.³ This is an increase of 4 percent from the number of homeless persons identified in January 2020 (66,436 persons). These include families that might be displaced through evictions, women and children displaced through abusive family life, persons with substance abuse problems, veterans, or persons with serious mental illness. Blacks/African Americans are overrepresented in the homeless population, comprising 30 percent of the homeless population but only 9 percent of the total population of Los Angeles County. No other identified racial/ethnic groups were overrepresented in the homeless population. Approximately 45 percent of homeless individuals identified as Hispanic/Latino, 30 percent as Black/African American, 21 percent as non-Hispanic/Latino White, 2.5 percent as mixed or multiple races, one percent as Asian, and one percent as American Indian/Alaska Native.⁴ Six percent of identified homeless individuals are veterans, 26 percent have a substance use disorder, and 25 percent have a serious mental illness.⁵

West Covina is located within the San Gabriel Valley Service Planning Area (SPA 3), which had a 2022 homeless estimate of 4,661 people. LAHSA estimated that there were 112 homeless persons in West Covina in 2022, a decrease of almost 10 percent from 2020 (124 persons).⁶ According to LAHSA’s homeless counts, the number of homeless persons in West Covina has steadily decreased between 2018 and 2022, as shown in Table D-4. Between 2018 and 2022, the homeless population in West Covina decreased by approximately 56 percent.

Table D-4 Homeless Population – West Covina (2018 - 2022)

	2018	2019	2020	2022
Number of Homeless Persons	254	142	124	112
Percent Change		-44.1%	-12.7%	-9.7%

Source: LAHSA. 2023, 2020, 2019, 2018 Homelessness Statistics by City. <https://www.lahsa.org/documents?q=Homelessness%20Statistics%20City&doctype=&scope=&proctype=&projtype=&sort=Newest>

According to LAHSA’s 2022 Homeless Count, the western part of the city, specifically census tracts bordering the community of Valinda, has a higher share of the city’s homeless population. Most census tracts in southern and eastern parts of the city did not have any homeless persons recorded in the 2022 homeless count.⁷ The City’s experience with the local homeless population is consistent with LAHSA’s Homeless Count. The City’s homeless population tend to congregate near shopping centers and close to the City’s borders, specifically in the following areas:

³ LAHSA. 2022. 2022 Greater Los Angeles Homeless Count. <https://www.lahsa.org/documents?id=6515-lacounty-hc22-data-summary>

⁴ LAHSA. 2022. 2022 Greater Los Angeles Homeless Count Deck. <https://www.lahsa.org/documents?id=6545-2022-greater-los-angeles-homeless-count-deck.pdf>

⁵ LAHSA. 2022. 2022 Greater Los Angeles Homeless Count. <https://www.lahsa.org/documents?id=6515-lacounty-hc22-data-summary>

⁶ LAHSA. 2023. Homelessness Statistics by City. <https://www.lahsa.org/documents?id=7029-homelessness-statistics-by-city-january-2023.pdf>

⁷ LAHSA. 2022. HC22 Data by Census Tract Split. <https://www.lahsa.org/documents?id=6543-hc22-data-by-census-tract-split>

- Azusa Avenue between Workman Avenue and Puente Avenue (near the Covina border)
- Along West Covina Parkway between Sunset Avenue and Valinda Avenue
- Along S. Glendora Avenue near the City's border
- Amar Avenue and Valinda Avenue (near the La Puente border)
- Near the Eastland shopping center (near the Covina border)
- Nogales Street and La Puente Road
- Valley Boulevard and Nogales Street

LAHSA does not breakdown homelessness data by racial/ethnic or disability categories for cities. However, it is assumed that the homeless population in West Covina has similar characteristics compared to the surrounding area. In 2022, more than half of homeless persons in SPA 3 identified as Hispanic/Latino (56 percent, 2,618 persons). Approximately 25 percent (1,155 persons) identified as non-Hispanic/Latino white, 17 percent identified as Black/African American, and one percent (45 persons) identified as mixed or multiple races. Comparing racial/ethnic characteristics between the homeless population in the SPA 3 area and racial/ethnic characteristics of the total population in West Covina indicates that Hispanic/Latino, non-Hispanic/Latino White, and Black/African American residents are overrepresented in the homeless population (Table D-5).

While LAHSA does not provide a breakdown of homelessness data by disability or substance abuse status, the City has observed a disproportionately high percentage of homeless individuals in the city have a mental health issue and/or have a substance abuse issue. These issues make providing services to homeless individuals challenging as individuals are often resistant to treatment facilities where they will have access to housing and food.

Table D-5 Homeless Population by Race SPA 3

Race	Percent of Total Population (West Covina)	Percent of Homeless Population (SPA 3)
Hispanic/Latino	52.6%	56.2%
Not Hispanic/Latino		
Asian/Pacific Islander	29.6%	0.4%
White	10.6%	24.8%
Black/African American	4.5%	17.4%
Other or Multiple Races	2.3%	1.0%
Native American/Native Alaskan	0.3%	0.1%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2017-2021), Table DP05; LAHSA. SPA 3 HC2022 Data Summary. 2022. <https://www.lahsa.org/documents?id=6508-spa-3-hc2022-data-summary>

Resources for Homeless Persons

In 1995, the San Gabriel Valley Consortium on Homelessness was created to help the region develop a strong regional response to the needs of the growing homeless population. The Consortium has a focus on facilitating partnerships, educating the community and member agencies, and advocating for appropriate services. In 2019, the Consortium reset its direction to a more concentrated effort to support and build capacity for local service

providers. The San Gabriel Valley Council of Governments (COG) is another regional agency that also addresses regional homelessness issues. As a member agency in the San Gabriel Valley COG, West Covina cooperates with its sister cities to address the issue of homelessness.

Emergency shelters, low barrier navigation centers and transitional or supportive housing help to address the needs of the homeless. Services and facilities available for the homeless in West Covina are coordinated primarily through the Los Angeles County continuum of care, which begins with assessment of the needs of the homeless individual or family. The person/family may then be referred to permanent housing or to transitional housing where supportive services are provided to prepare them for independent living. The goal of a comprehensive homeless service system is to ensure that homeless individuals and families move from homelessness to self-sufficiency, permanent housing, and independent living. The following agencies offer homeless assistance in and around West Covina:

- Citrus Valley Health Foundation provides a drop-in center where homeless persons can access a wide variety of services. The Foundation also serves the terminally ill and those in need of short-term acute care.
- The Institute for Urban Research and Development provides emergency shelter, breakfast and dinner, access to showers and toilets, limited case management services, and referrals to more comprehensive services to homeless families. IURD is housing participants at the Valley Inn in La Puente and the American Inn & Suites in Pomona.
- Catholic Charities Brother Miguel Center in Pomona provides vouchers/assistance referrals for those seeking shelter. They also provide utility disconnection and eviction prevention services, along with other counseling, training, and emergency/food assistance.
- YMCA-Wings Shelter for Battered Women located in West Covina provides shelter, counseling, and other needs of battered women and their children.
- The House of Ruth in Claremont provides services to women and their dependent children.
- Community Food Bank of West Covina provides assistance and emergency help for West Covina residents in need of food.
- The Salvation Army offers temporary shelter and food vouchers and referrals for West Covina and San Gabriel residents. Adult rehabilitation centers are among the most widely known of all Salvation Army services and comprise the largest resident rehabilitation program in the United States. Individuals with identifiable and treatable needs are able to check-in to facilities that assist them in becoming healthy. At the center they receive adequate housing, nourishing meals, and necessary medical care, and they engage in work therapy. They also benefit from group therapy, spiritual guidance, and skilled addictions counseling in clean and wholesome surroundings.
- Inland Valley Council of Churches serves homeless families through their emergency shelter and transitional housing programs. Those in need of shelter are able to stay a

maximum of 30 days while those using the transitional housing are able to stay between 12 and 24 months.

- The Santa Anita Family Services Senior Center serves low-income elderly with temporary personal care, in-home care during illness, respite for family caregivers, employment assistance, housekeeping, and assistance in filling out forms or with other legal matters. They also offer minor home renovation for low-income seniors with physical limitations.
- The East San Gabriel Valley Coalition for the Homeless is a nonprofit organization, helping the homeless find shelter. They offer referral services for medical appointment, hotel and motel and taxi vouchers, emergency food, sack lunches, showers and hygiene kits. They also offer referral assistance for paying rent and utilities. The Coalition also offers a Cold Weather Shelter that runs from mid-November until the end of March.

The City of West Covina takes a proactive approach to addressing needs of homeless residents. This effort is led by the City's Community Services Department; Police Department; and Public Works Department. West Covina partners with Los Angeles County to implement the Rapid Re-Housing Program, which connects homeless individuals and families to permanent housing through the provision of time-limited financial assistance case management and targeted supportive services, and housing identification/navigation supports. The City's website provides information and links for homeless services available to residents in West Covina. On the City's website residents can report homeless encampments, request assistance for a homeless person.

In the City's Plan to Prevent and Combat Homelessness, community stakeholders identified that some homeless residents are resistant to receiving services and shelter. In addition, public opposition is a challenge to introducing new housing and service programs. Feedback from persons experiencing homelessness identified there is a need for more housing resources, as well as employment and legal assistance and access to basic necessities such as showers and storage for personal belongings. Persons experiencing homelessness also shared that local homeless shelters are unsafe, too far away, and unaccommodating to the lesbian, gay, bisexual, and transgender community.

D.4.5 Displacement Risk

In 2016, the Urban Displacement Project⁸ developed a neighborhood change database to help stakeholders better understand where neighborhood transformations are occurring and to identify areas that are vulnerable to gentrification and displacement in Southern California. The database includes Los Angeles, Orange, and San Diego counties, with gentrification and sociodemographic indicators based on data from the Census Bureau American Community Survey and shows whether each Census tract gentrified between 1990 and 2000; gentrified between 2000 and 2015; gentrified during both of these periods;

⁸ <https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/>

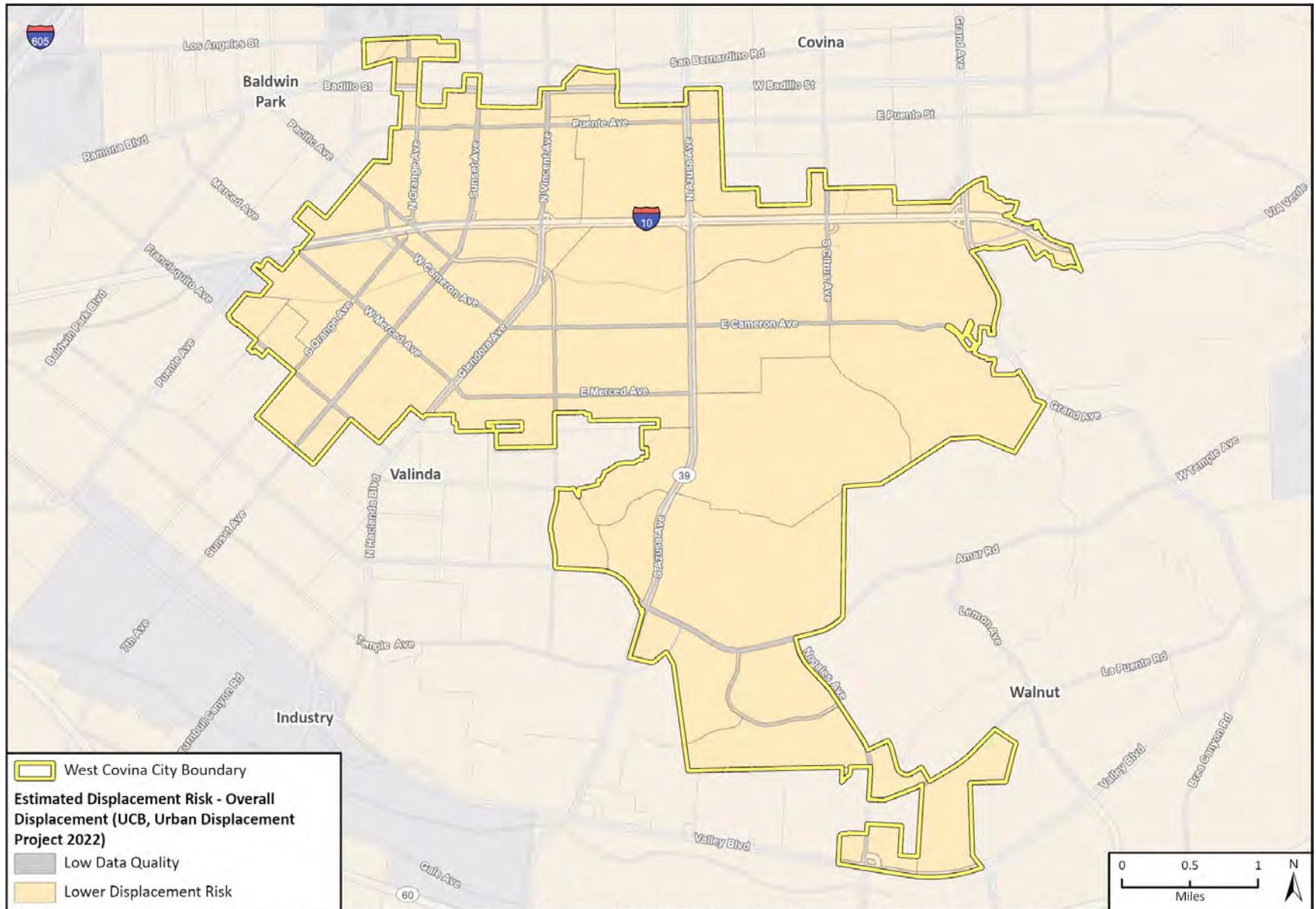
or exhibited characteristics of a “disadvantaged” tract that did not gentrify between 1990 and 2015.

According to the Urban Displacement Project, there are no areas in West Covina that are at elevated risk of displacement (Figure D-34). However, rising housing costs and high rates of overpayment renter households indicate that renter households are vulnerable to displacement throughout West Covina. ACS estimates show that median rent has increased year-over-year between 2015 to 2021, increasing by 35 percent during this period (from \$1,391 to \$1,872). The southwestern part of the city has an overlap of high overpayment by renters and high median gross rent compared to the rest of the city, indicating that displacement risk is likely highest in this part of the city.

As discussed in Section 3.8 of the Housing Needs Assessment, there are two developments – Mountain Shadows, located in the southern part of the city, – with 84 lower-income units at risk of converting to market rate during the 2021 to 2031 period. and Mauna Loa – with 12 units at risk of converting to market rate during the 2021 to 2029 period. Residents living in these developments may be at risk of displacement if units are converted to market rate.

Areas most susceptible to displacement in Los Angeles County are in portions of the cities of Los Angeles and the western part of the Gateway Cities, including Inglewood and Huntington Park (Figure D-35).

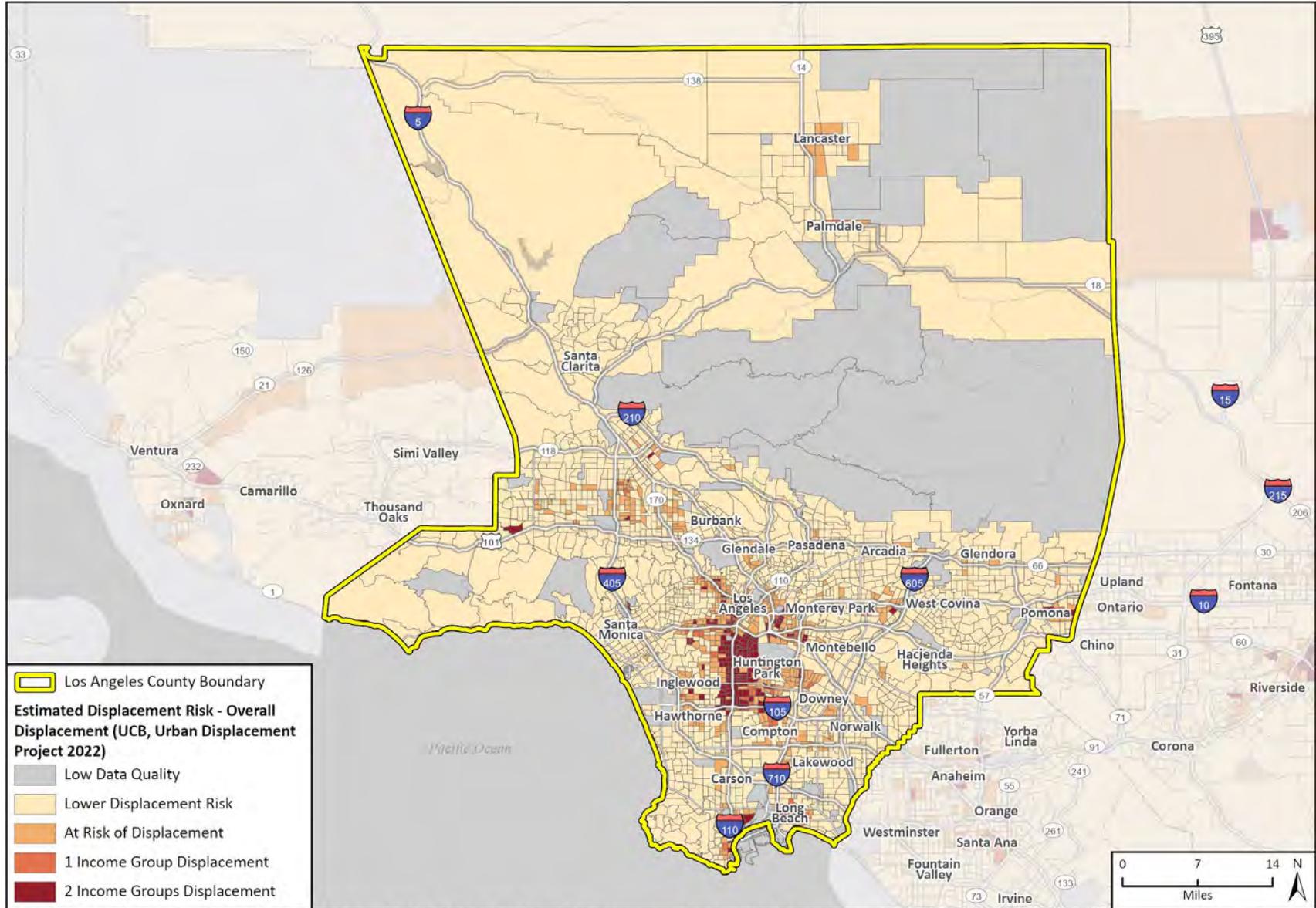
Figure D-34 Displacement Vulnerability – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-35 Displacement Vulnerability – Los Angeles County



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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D.5 Local Knowledge

D.5.1 Historic Patterns of Segregation

Patterns of racial segregation are the byproduct of local and federal policies, private housing discrimination, and community prejudice. To understand present challenges to fair housing, it is necessary to review the history of actions that have led to regional patterns of segregation.

At the beginning of the 20th century, racial/ethnic minorities were highly segregated in Los Angeles County. According to Los Angeles County's Draft Racial Equity Strategic Plan, "Mexican Americans and Mexican immigrants tended to occupy the worst slum housing in the city of Los Angeles and were clustered in particular parts of the city along with the Chinese [residents] in Chinatown and enclaves of European immigrants in "foreign" districts." Black/African American residents were actually less segregated compared to Chinese and Japanese residents. However, throughout the 20th century, segregation between Black/African American and white residents would increase as Black/African Americans, many who were immigrants leaving the south to escape Jim Crow, settled south of downtown Los Angeles, now referred to as "South Central".⁹ During the first couple decades of the 20th century, Los Angeles had one of the highest proportions of Black homeowners in the country.^{9,10} In spite of that, Black/African Americans still faced significant discrimination, particularly in employment.⁹

In 1917, the United States Supreme Court outlawed the ability of cities to designate where different racial groups could legally reside through zoning laws, leading to the widespread adoption of racially restrictive covenants. These covenants forbade the buyer of a home from subsequently selling or renting that home to Blacks, Mexicans, Mexican Americans, or the Japanese. In 1919, racially restrictive covenants were bolstered by the California Supreme Court ruling in *Los Angeles Investments Co vs. Gary* which stated that people of color had the right to buy property in neighborhoods covered by restrictive covenants, but not to live in that property. Subsequent lawsuits permitted Black/African American residents to be expelled from neighborhoods as they became covered by restrictive covenants. During and after World War II, the Black/African American population in Los Angeles nearly doubled, with new residents settling in neighborhoods with large Black/African American populations, including South Central. In response, Mexican and Asian residents who had previously resided in these neighborhoods moved to predominantly White neighborhoods. In particular, Mexican residents moved to suburban areas throughout Los Angeles, including West Covina. Restrictive covenants were ruled unconstitutional in 1948; however, this only

⁹ Los Angeles County. 2022. Los Angeles County Draft Racial Equity Strategic Plan. https://file.lacounty.gov/SDSInter/lac/1123282_DraftLosAngelesCountyRacialEquityStrategicPlan4.21.22.pdf

¹⁰ Kevin Waite. 2021. Black California: A Review of West of Jim Crow. <https://boomcalifornia.org/2021/02/12/black-california-a-review-of-west-of-jim-crow/>

caused proponents of these covenant to turn to other methods of segregation, including redlining.⁹

Starting in the 1930s, communities in the Los Angeles region were impacted by redlining, which is the practice of discriminating against loan borrowers based on the racial or socioeconomic status of the neighborhood in which a property is located. Redlining, a government-sponsored system of denying mortgage loans and services to finance the purchase of homes in specific areas, served as a tool to limit homeownership opportunities, as federally insured and long-term mortgages were routinely denied to persons seen as “undesirable,” often non-white persons. Redlining directed both public and private capital to white households and away from Black/African American, non-white, immigrant, and Jewish households. As homeownership is one of the most significant means of intergenerational wealth building in the United States, these redlining practices had long-term effects in creating wealth inequalities.¹¹

A federal agency called the Home Owners’ Loan Corporation created residential security maps in the 1930s throughout American cities to support the Federal Housing Administration and its new mortgage program. These maps designated certain neighborhoods as desirable or not worth investment based on several factors. These included housing age, condition, and value, as well as proximity to services, amenities, and transportation. “Security” levels were color-coded from green (least risk), blue, yellow, and red (highest level of risk). Problematically, the key factors in determining risk were race and ethnicity. Neighborhoods with a multicultural community, recent immigrants, or families of color were severely downgraded or redlined. Areas that saw majority populations of white residents were either left unmarked or were given a high-desirability rating. These maps documented the perceived risk of lending and determined the lending practices of banks and other mortgage lenders administering the federal loans. This led to disinvestment in cities and a loss of wealth building for generations of American families. This practice of racial exclusion from homeownership allowed white Americans to accumulate wealth through government backed homeownership while minority communities were excluded and marginalized. Over 80 years later, 74 percent of neighborhoods color coded red are low to moderate income today and nearly 64 percent are minority neighborhoods now.¹²

D.5.2 Community Feedback

The City conducted a thorough community outreach process to allow opportunities for community members to share feedback and housing related concerns. The City held a

⁷ Los Angeles County. 2022. Los Angeles County Draft Racial Equity Strategic Plan.

https://file.lacounty.gov/SDSInter/lac/1123282_DraftLosAngelesCountyRacialEquityStrategicPlan4.21.22.pdf

¹¹ Mapping Inequality: Redlining in New Deal America.

<https://dsl.richmond.edu/panorama/redlining/#loc=14/34.067/-118.143&city=los-angeles-ca&area=C127>

¹² HOLC “Redlining Maps,” The persistent Structure of Segregation and Economic Inequality, NCRC, Bruce Mitchell, PhD. Accessed: January 5, 2022, https://ncrc.org/wp-content/uploads/dlm_uploads/2018/02/NCRC-Research-HOLC-10.pdf

series of meetings including a public workshop, town hall meetings, and Planning Commission and City Council meetings.

Community feedback identified the following fair housing issues in West Covina:

- Lack of sufficient affordable housing in the city
- Lack of affordable housing for seniors
- Desire for more affordable housing in high-income and high-resource neighborhoods
- Desire for a variety of housing types
- Need resources for first-time homebuyers
- Need resources for housing rehabilitation and repair assistance
- Need transitional and supportive housing and services for homeless residents
- Need anti-displacement resources to ensure existing residents are not displaced when new housing is developed

D.5.3 Other Relevant Factors

Other factors that have not been previously discussed related to fair housing include zoning and land use patterns, the availability and access to housing choice vouchers, the location of subsidized and public housing units, and rising housing costs.

Zoning and Land Use Patterns

Most of West Covina is zoned for single-family residential uses (R-1 zone). Areas allowing multi-family residential uses are scattered throughout the city (MF-8, MF-15, MF-20, and MF-45 zones), but primarily concentrated in and adjacent to downtown West Covina (T4-GU, T4-UN, and T5-UC zones) and the area north of the BKK District. These areas have a higher percentage of renter households compared to other areas of the city. According to the HCD AFFH Data Viewer, downtown West Covina does not have a higher concentration of non-white or LMI residents. However, the area north of the BKK District has a higher percentage of female-headed, single-parent households,

Housing Choice Vouchers

The Housing Choice Voucher (HCV) Program in West Covina is administered by the Baldwin Park Housing Authority (BPHA). According to BPHA, 106 households receive HCVs and 86 households are on the waiting list in West Covina. HCV use is most prevalent in census tracts in western, northern, and southern parts of the city, where between 5 and 24 percent of households use HCVs. Areas with greater HCV use correspond to the location of subsidized affordable housing throughout the city and areas with a high percentage of non-white residents (Figure D-36).

Location of Public Housing

Public housing includes affordable rental units that are owned and operated by the government. The HATC manages public housing units in West Covina which are available

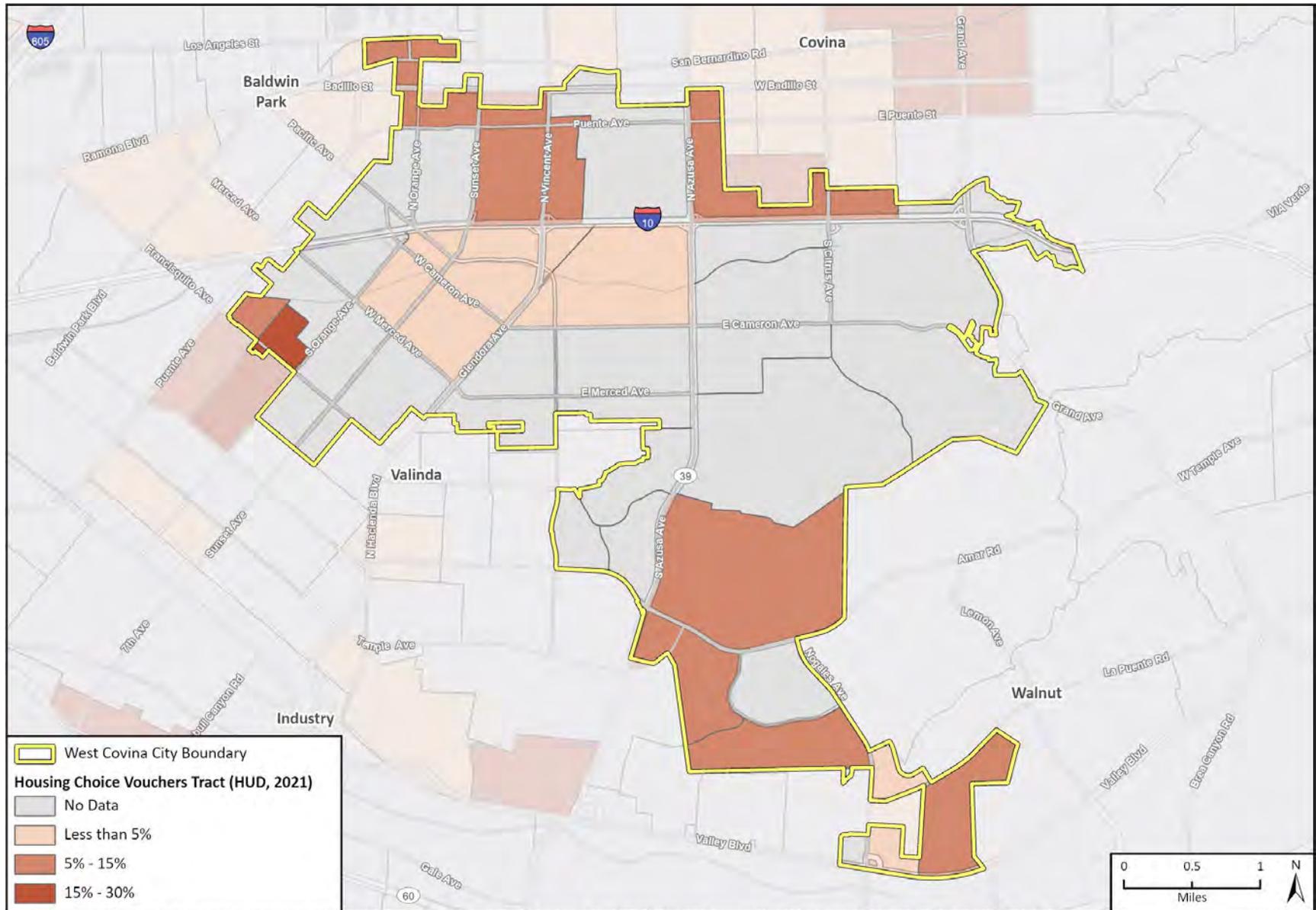
to low-income households, the elderly, and persons with disabilities. Public housing developments in West Covina are concentrated in western and northern parts of the city (Figure D-37).

Public housing units are located in areas that are predominantly Hispanic/Latino, moderate resource areas, with higher poverty rates compared to the rest of the city.

Rising Housing Costs

Home values and rent costs have steadily increased in West Covina. According to CoreLogic, home sale prices increased 51 percent between 2016 and 2021 from \$490,000 to \$741,500. In addition, ACS estimates indicate median rent costs increased 35 percent between 2015 and 2021, from \$1,391 to \$1,872 per month. However, ACS estimates show that median household income only increased by 26 percent between 2016 and 2021, from \$71,217 to \$89,834. These trends indicate that households are having to pay more for housing but their income is not keeping up with these increases. Therefore, housing affordability is becoming a more prevalent issue throughout the city.

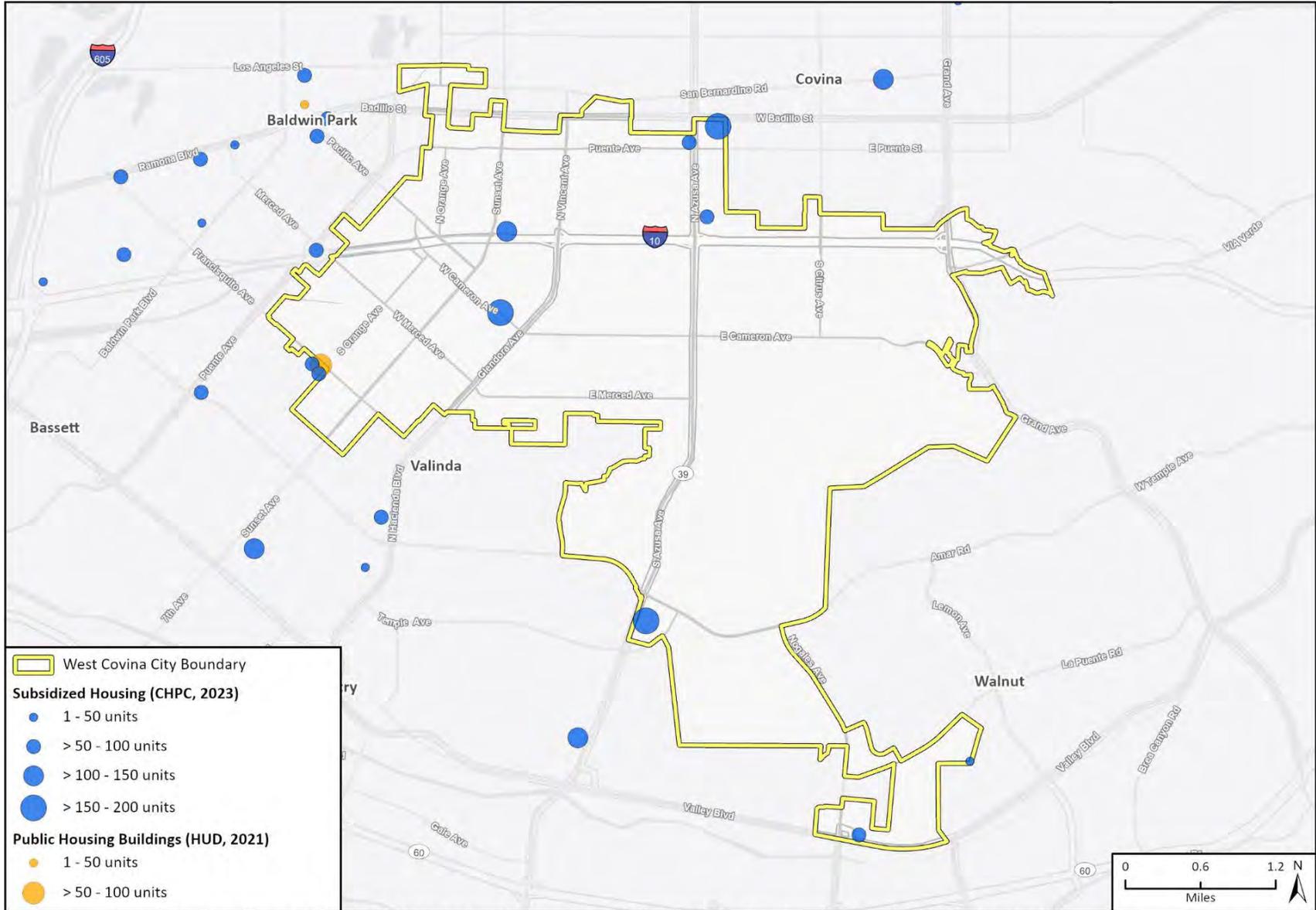
Figure D-36 Housing Choice Vouchers – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Figure D-37 Public Housing – West Covina



City of West Covina, County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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D.6 Sites Inventory Analysis

The City's inventory of sites for potential housing is presented in Appendix B. As summarized in Table B-1, the inventory is comprised of approved or pending projects, non-vacant underutilized sites and future ADUs. As with most cities in the metro areas of Southern California, vacant developable land is very rare, and underutilized sites – particularly commercially zoned land – provide the majority of future housing development capacity.

D.6.1 Housing Sites by TCAC Opportunity Area

For purposes of evaluating fair housing, resource levels designated by TCAC/HCD denote access to economic and educational opportunities such as low-cost transportation, jobs, and high-quality schools and the quality of environmental factors in the area such as proximity to hazards and air quality. TCAC has a composite opportunity score for each census tract. West Covina has a mix of moderate and high resource areas. The western part of the city primarily consists of moderate resource areas while the central and eastern areas are primarily high resource areas. A very small area of the city in the northwestern part of the city is a low resource area.

The City's Site Inventory can accommodate 5,739 housing units on 192 sites. Figure D-38 shows the housing opportunity sites by TCAC designated resource area. The housing opportunity sites are designated by income category – whether the sites could accommodate housing appropriate for low-, moderate-, or above moderate-income households. The “appropriateness” of sites for various affordability levels is dictated by State housing element law and HCD guidance and includes allowable density, size of site, realistic capacity, existing use(s), and other factors. More information about the sites and income designations is available in Appendix B, Site inventory.

Most of the housing opportunity sites are in moderate resource areas (89 percent of the proposed housing units) and high resource areas (11 percent of proposed housing units), primarily in the western part of the city, in part due to the availability of large vacant and underutilized parcels in these neighborhoods.

D.6.2 Total Units by Resource Area

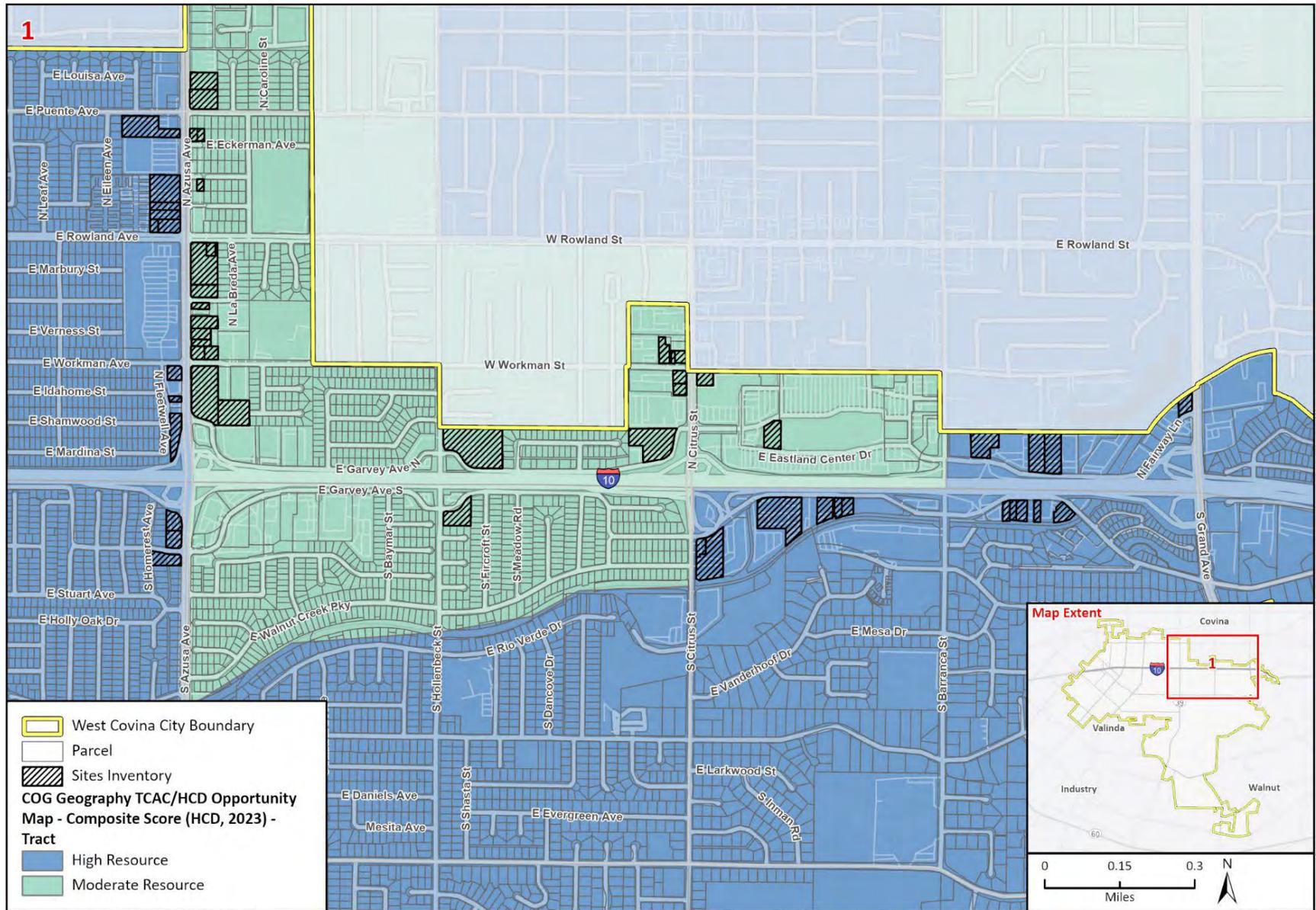
There are 6 units planned in low resource areas, less than one percent, of the total proposed units. Two of those units will be moderate-income units and 4 will be moderate-income units. In contrast, 5,094 units are planned in areas designated moderate-resource and 639 units are planned in high/highest-resource areas. Approximately 45 percent of proposed units in moderate and high/highest resource areas are lower-income units (2,590 units) will be lower-income units, 22 percent (1,283 units) will be moderate-income units, and 32 percent (1,861 units) will be above moderate-income units. Table D-6 shows the number of proposed housing units by income level in each resource area.

Table D-6 Proposed Housing Units by Resource Area (Housing Opportunity Sties)

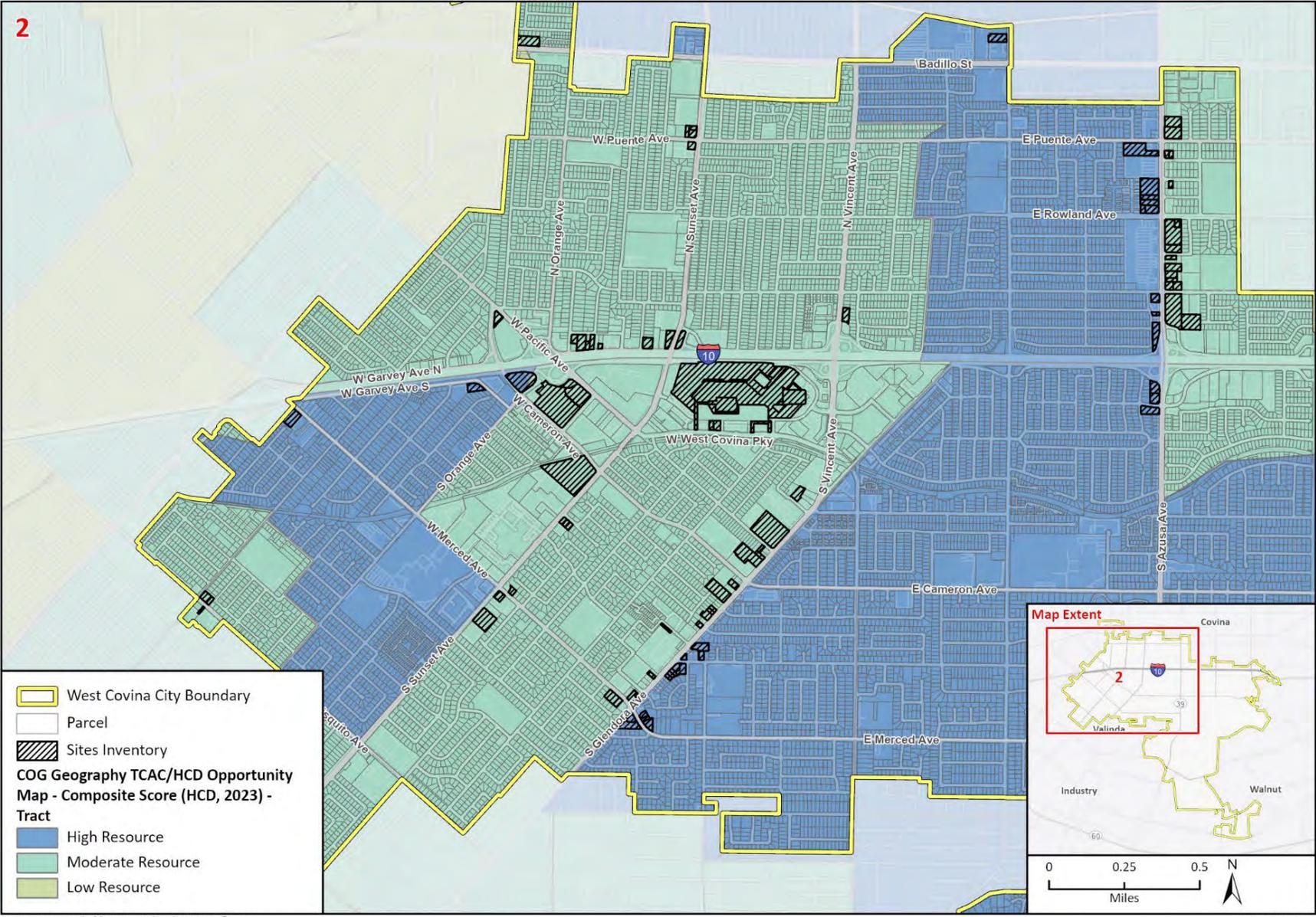
Income Level	Lower-Income	Moderate-Income	Above-Moderate Income
Areas of High Segregation and Poverty	0 units 0% of lower-income Units	0 units 0% of moderate-income Units	0 units 0% of above moderate-income Units
Low-Resource Areas	0 units 0% of lower-income Units	2 units <1% of moderate-income Units	4 units <1% of above moderate-income Units
Moderate-Resource Areas	2,485 units 96% of lower-income Units	1,154 units 90% of moderate-income Units	1,456 units 78% of above moderate-income Units
High-/Highest-Resource Areas	106 units 4% of lower-income Units	129 units 10% of moderate-income Units	405 units 22% of above moderate-income Units

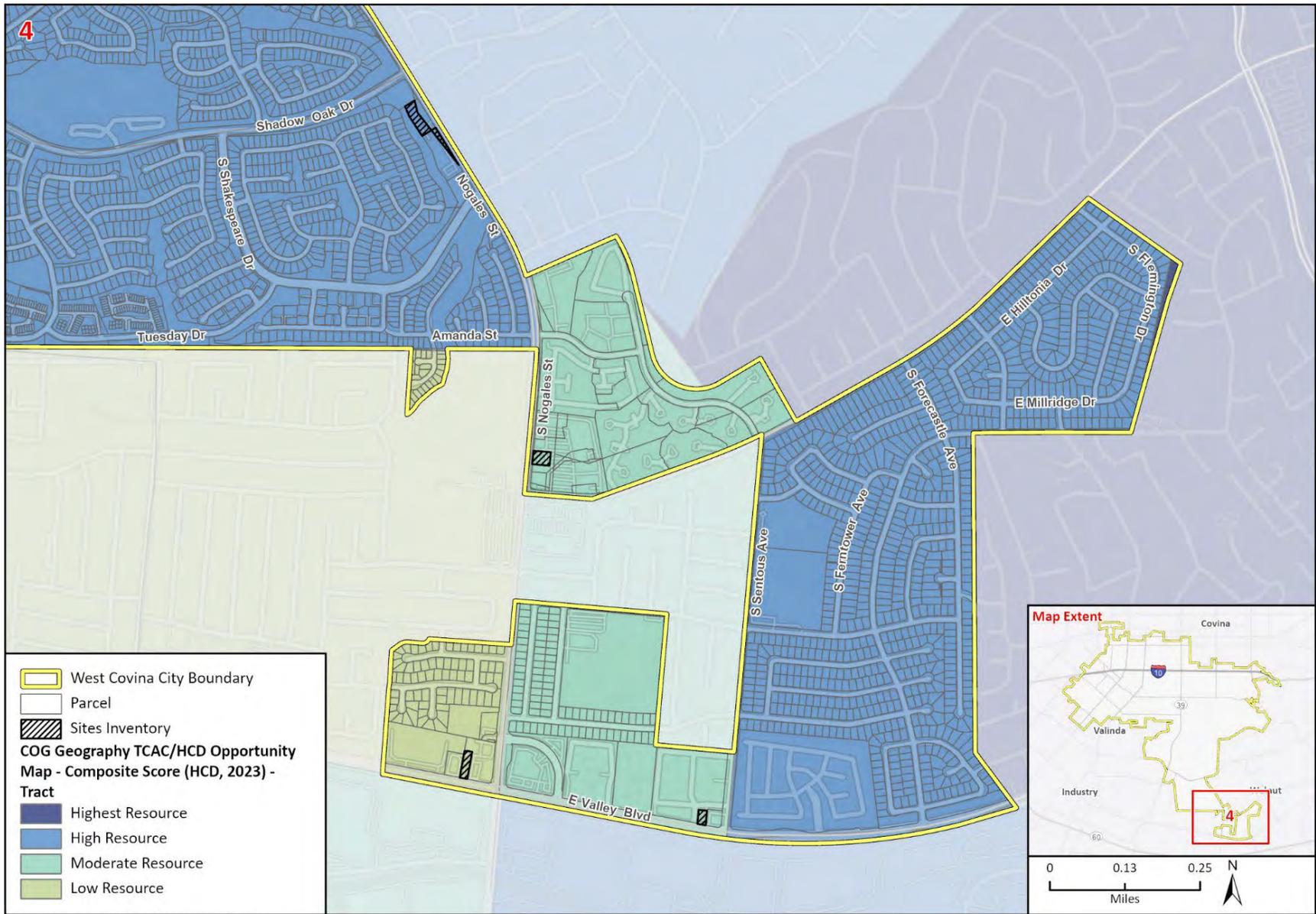
The housing opportunity sites will add all of the lower-income units in moderate- resource areas (96 percent of total lower-income units) and high-resource areas (4 percent of total lower-income units). Therefore, overall housing development during the planning period will not increase patterns of segregation and will increase integration by household income in terms of access to opportunity

Figure D-38 TCAC Opportunity Areas Composite Score – West Covina



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 Fig X AFFH Sites Inventory - Area 1





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Additional data provided by LA County, 2023; ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Fig X AFFH Sites Inventory - Area 4

D.6.3 Sites by Income Population

Census tracts with more than 50 percent low- and moderate-income (LMI) households are concentrated in western and northern parts of the city. Figure D-39 shows the housing opportunity sites by percentage of LMI populations. Approximately 86 percent of the total housing units included in the opportunity sites are located in census tracts with more than 50 percent LMI households due to the availability of underutilized sites in these areas and the potential for mixed-use, transit-oriented development. Approximately 96 percent of the total low-income units (2,485 housing units), 88 percent of the total moderate-income units (1,127 housing units), and 71 percent of the total above moderate-income units (1,332 housing units) are located in these areas. Of the opportunity sites in these areas, approximately 50 percent of proposed units are appropriate for above low-income households, 23 percent appropriate for moderate-income households, and 27 percent for above-income households. These areas of West Covina will benefit from the mix of households of differing income levels. The Site Inventory will improve the mixture of housing opportunities by income level in the city and will not exacerbate segregation by income between neighborhoods.

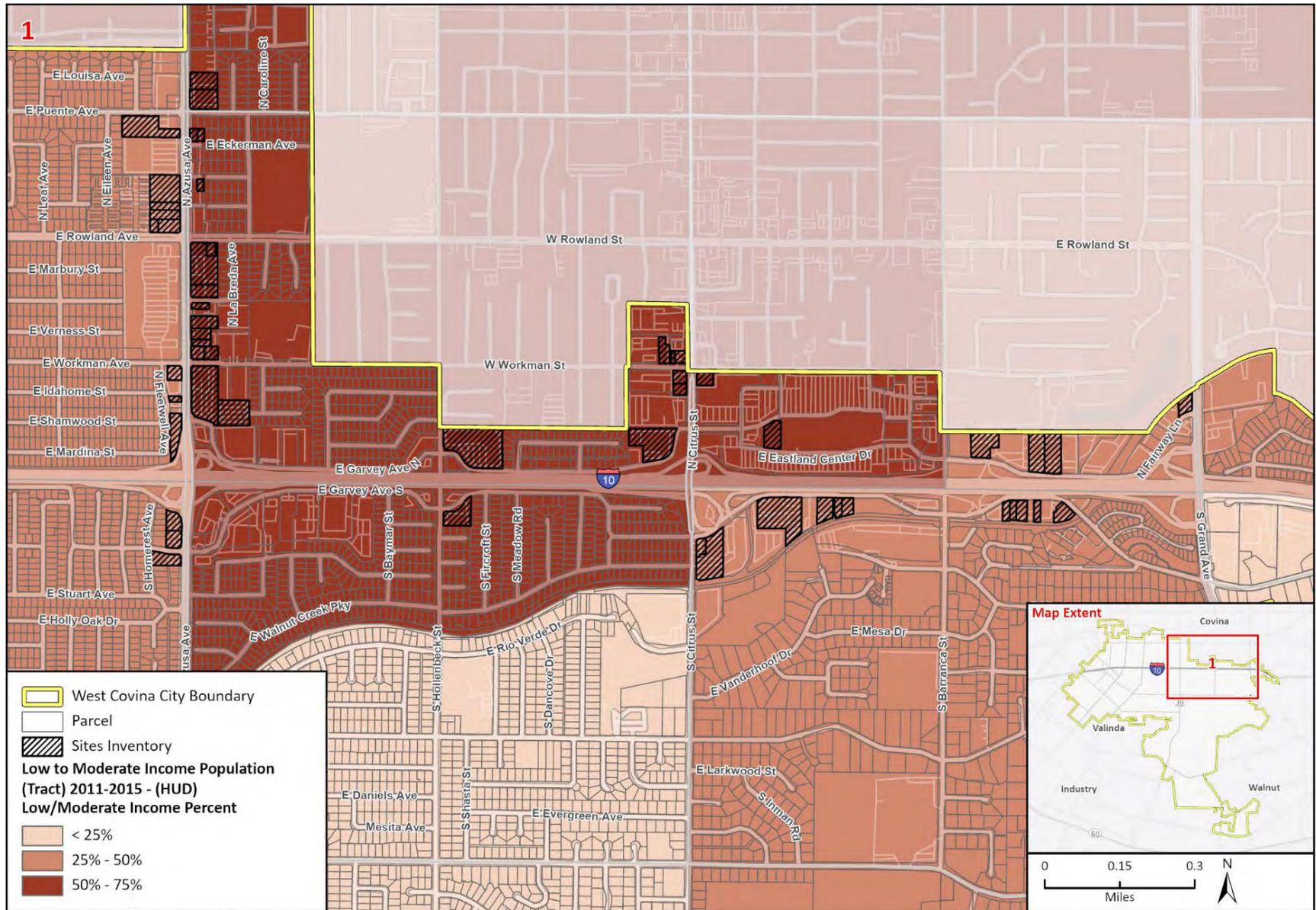
D.6.4 Sites by Overcrowded Households

Overcrowding is highest in census tracts in the middle and southern part of the city, where between 10 and 11 percent of housing is overcrowded. Figure D-40 shows the housing opportunity sites by overcrowding. The Site Inventory proposes 429 housing units in census tracts with 10 or more percent of housing units that are overcrowded, of which 113 would be moderate-income (9 percent of the total moderate-income units) and 316 would be above moderate-income (17 percent of the total above moderate-income units). The remaining housing units could be accommodated in areas which have lower levels of overcrowding. The Site Inventory will not exacerbate overcrowding conditions but will add new housing opportunities in areas that need them.

D.6.5 Sites by Cost Burden by Renters

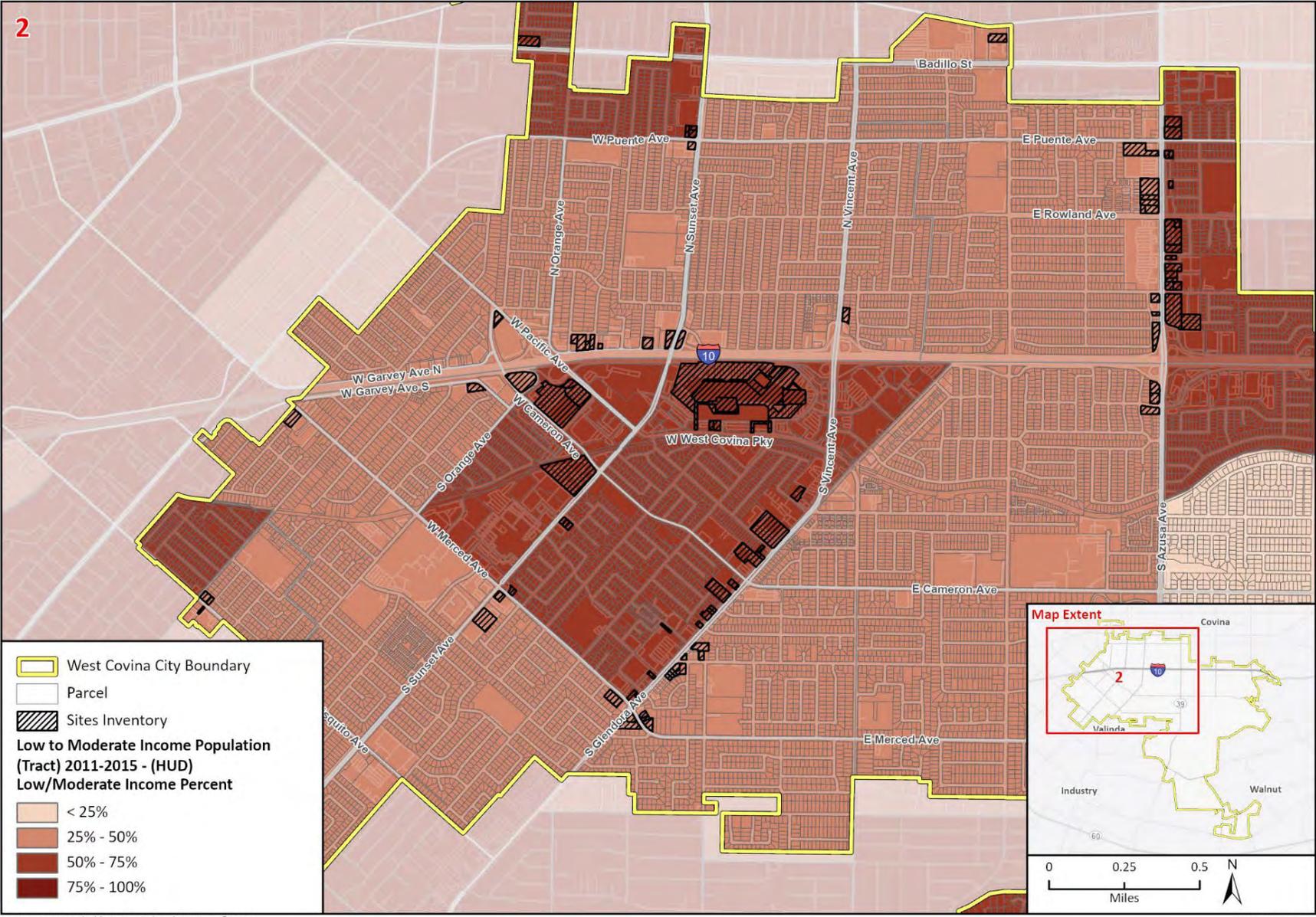
The percentage of cost burden among renters is high throughout the northern and western parts of West Covina, where between 40 to 80 percent of renters are experiencing cost burden. Figure D-41 shows the housing opportunity sites by overpayment by renters. The housing opportunity sites will provide housing opportunities for a mix of income levels in western and northern West Covina. All of the proposed lower-income units (2,590 units), 94 percent of moderate-income units (1,201 units) and 83 percent of above moderate-income units (1,547 units) are proposed in census tracts where 50 percent or more of residents are low- or moderate-income. Most of these housing units will likely be rental units, based on trends in planning entitlements and developer interest.

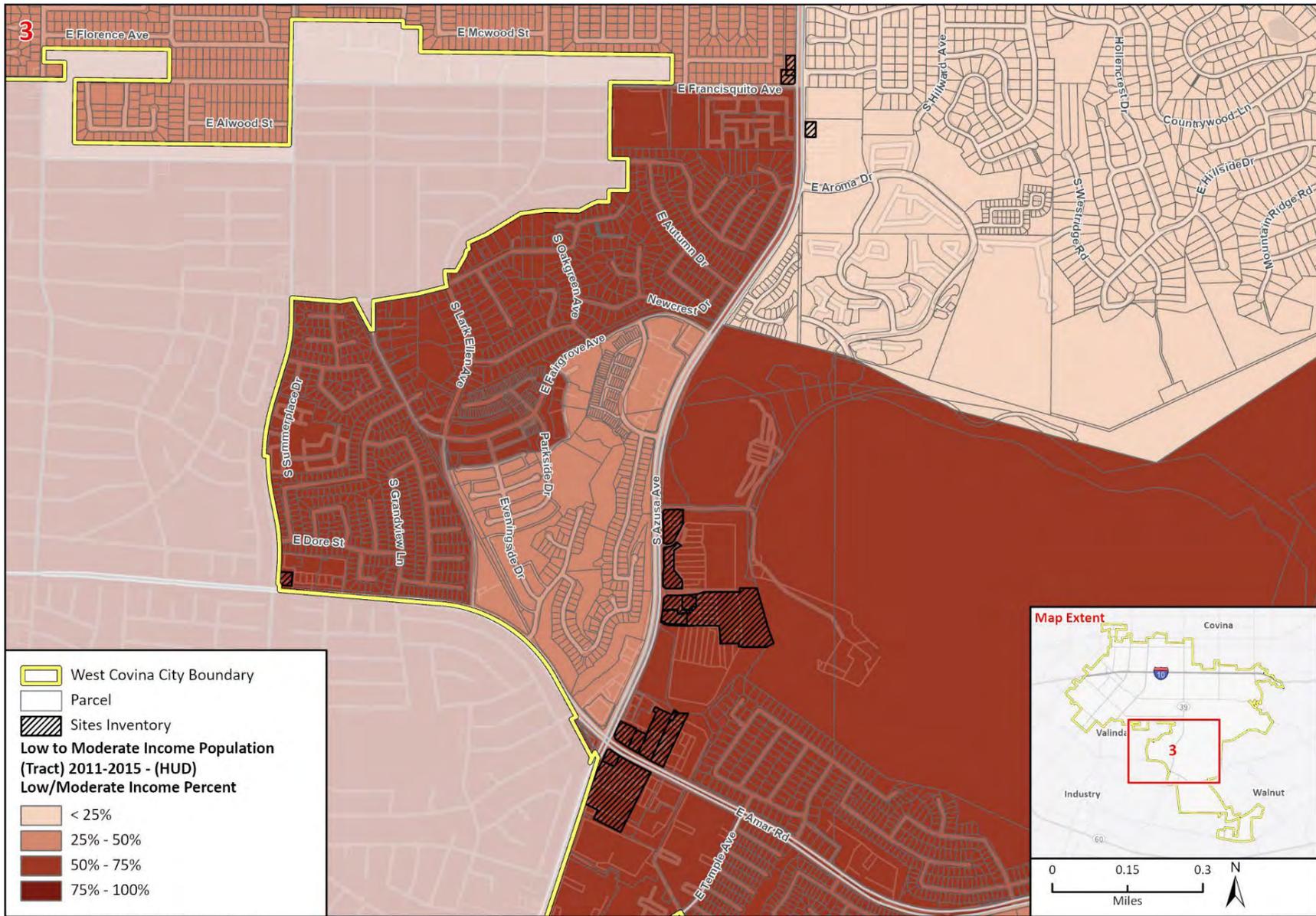
Figure D-39 Housing Opportunity Sites by Income Population – West Covina



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 Additional data provided by LA County, 2023; ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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 Fig X AFFH Sites Inventory - Area 1

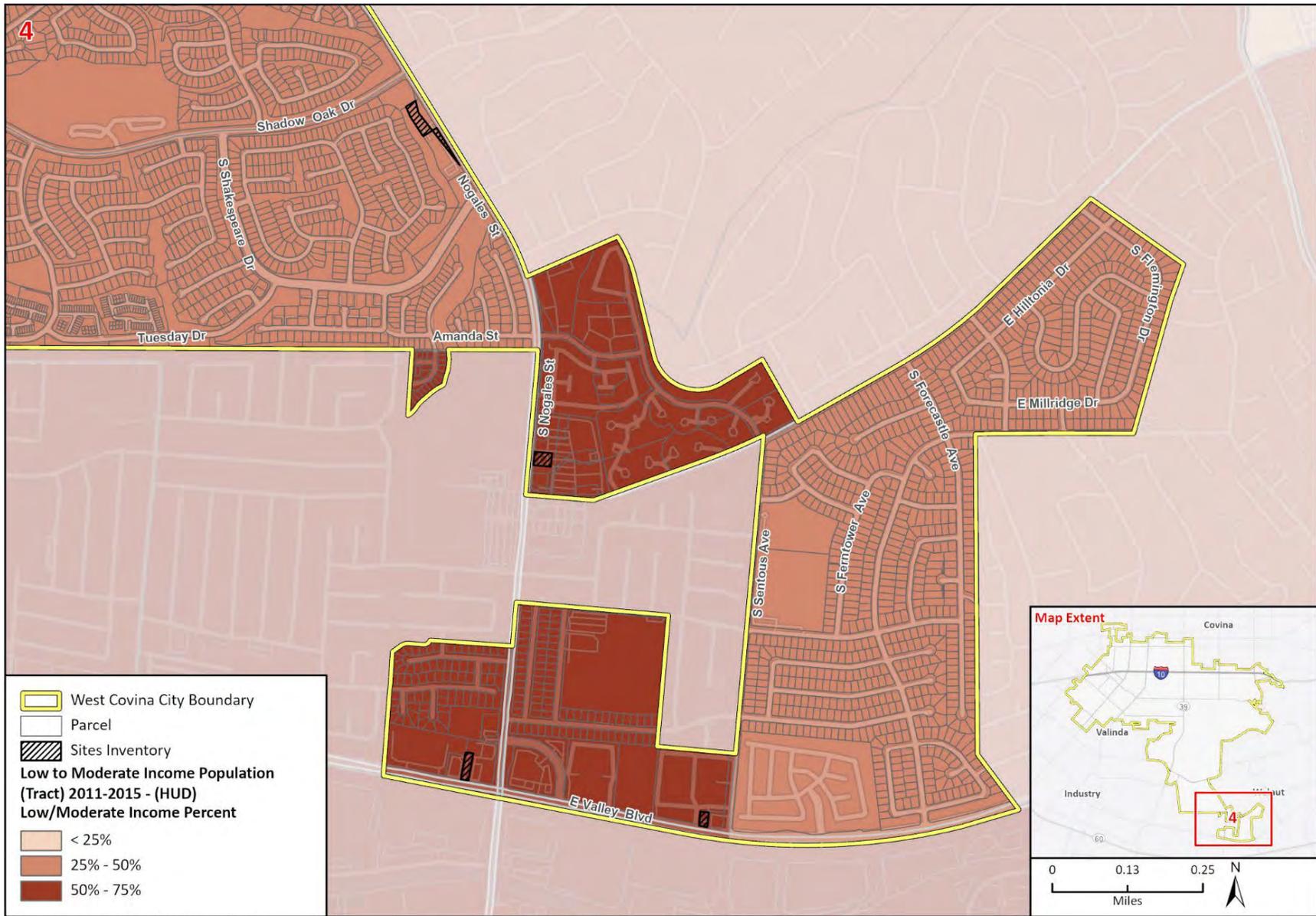




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Fig X AFFH Sites Inventory - Area 3

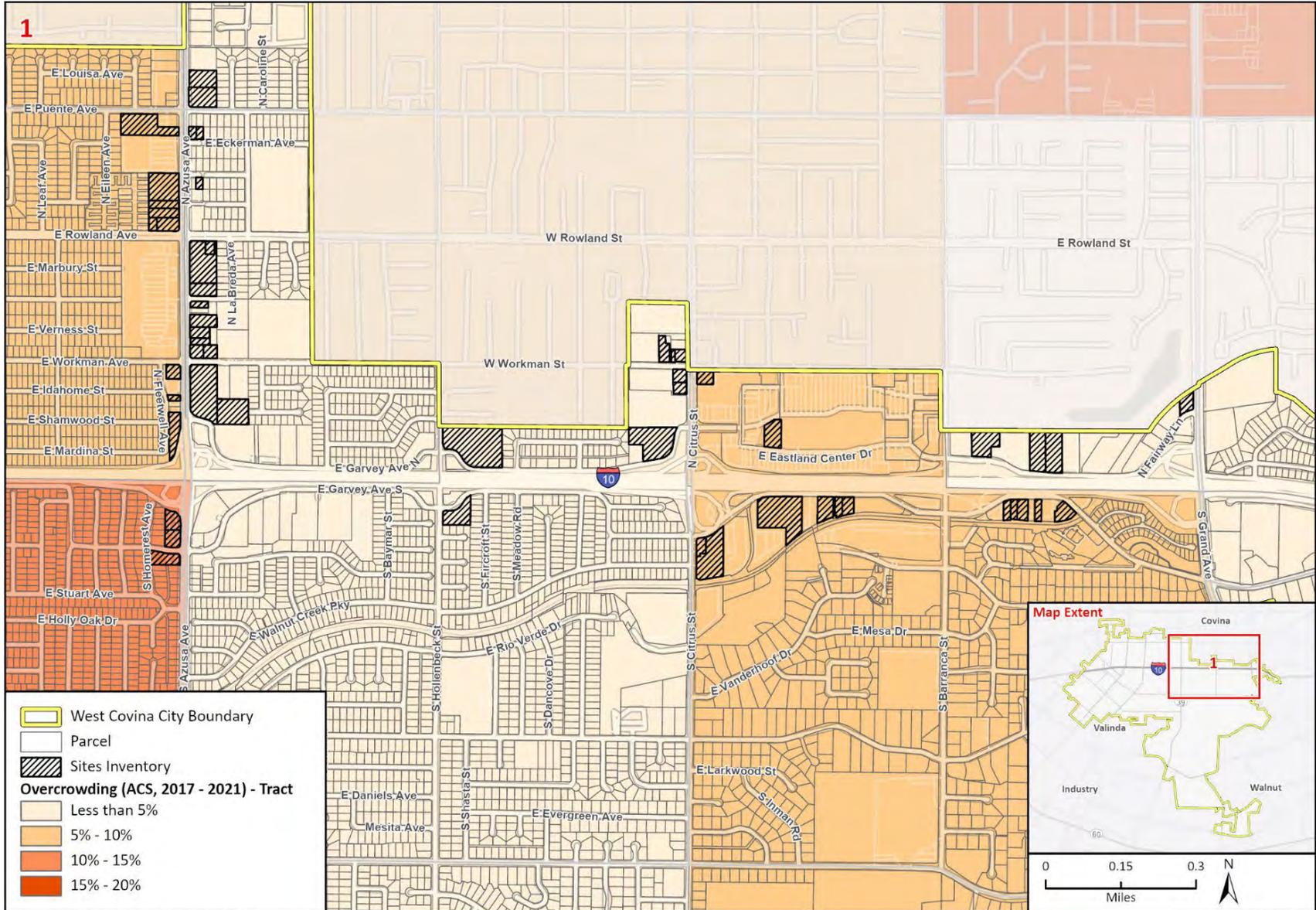


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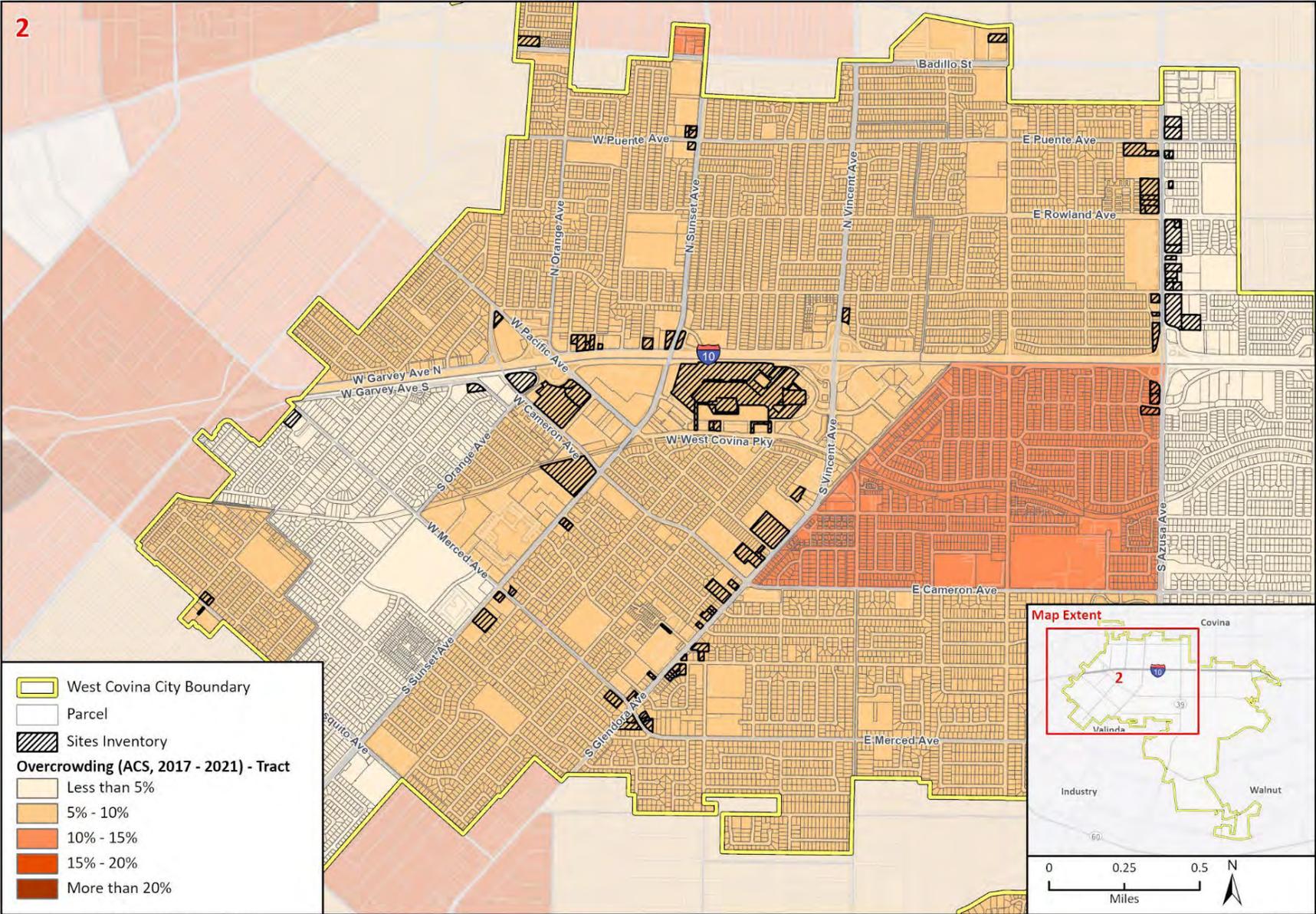
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Fig X AFFH Sites Inventory - Area 4

Figure D-40 Housing Opportunity Sites by Overcrowding – West Covina



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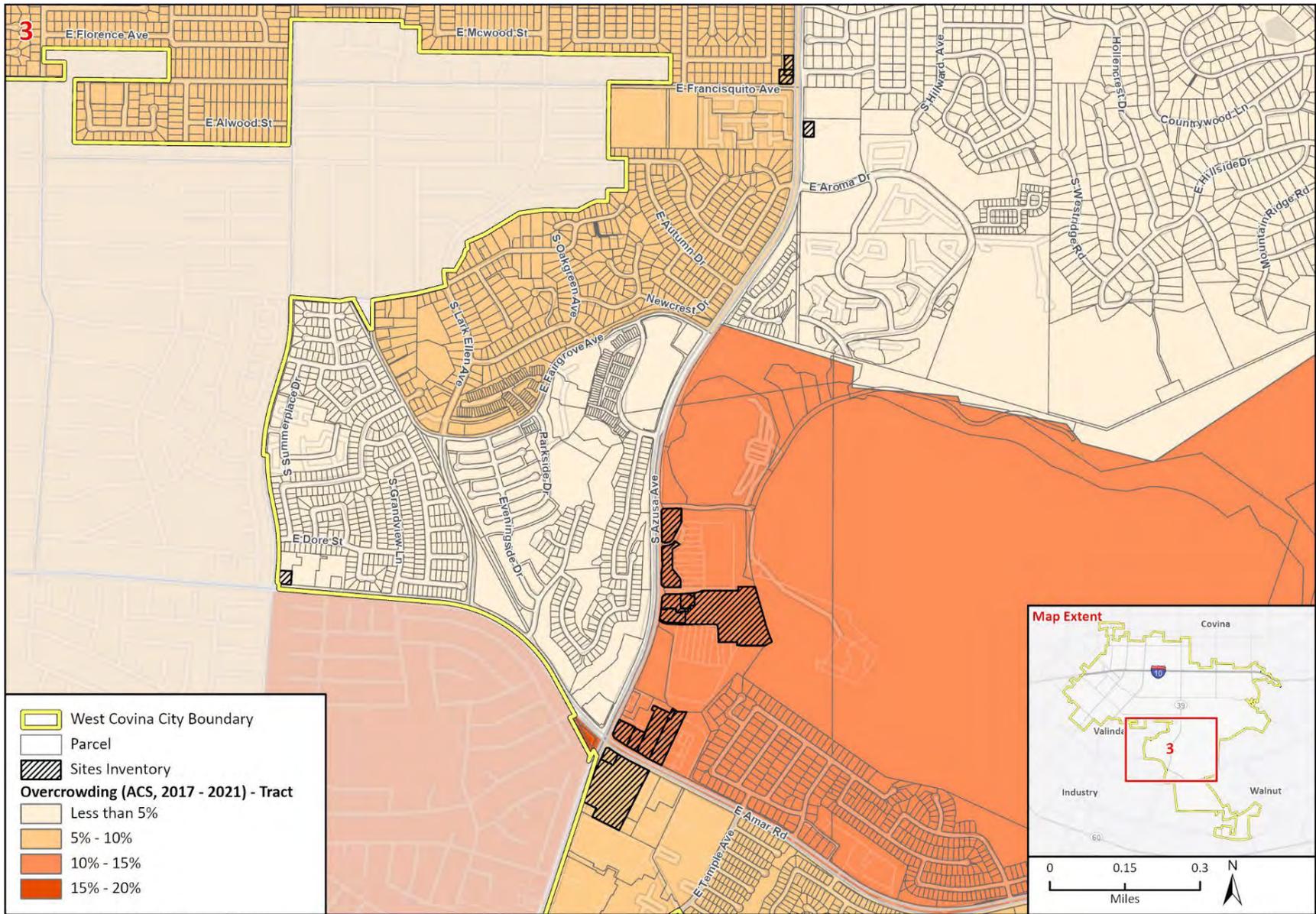
23-14758 HE_AFFH
 Fig X AFFH Sites Inventory - Area 1



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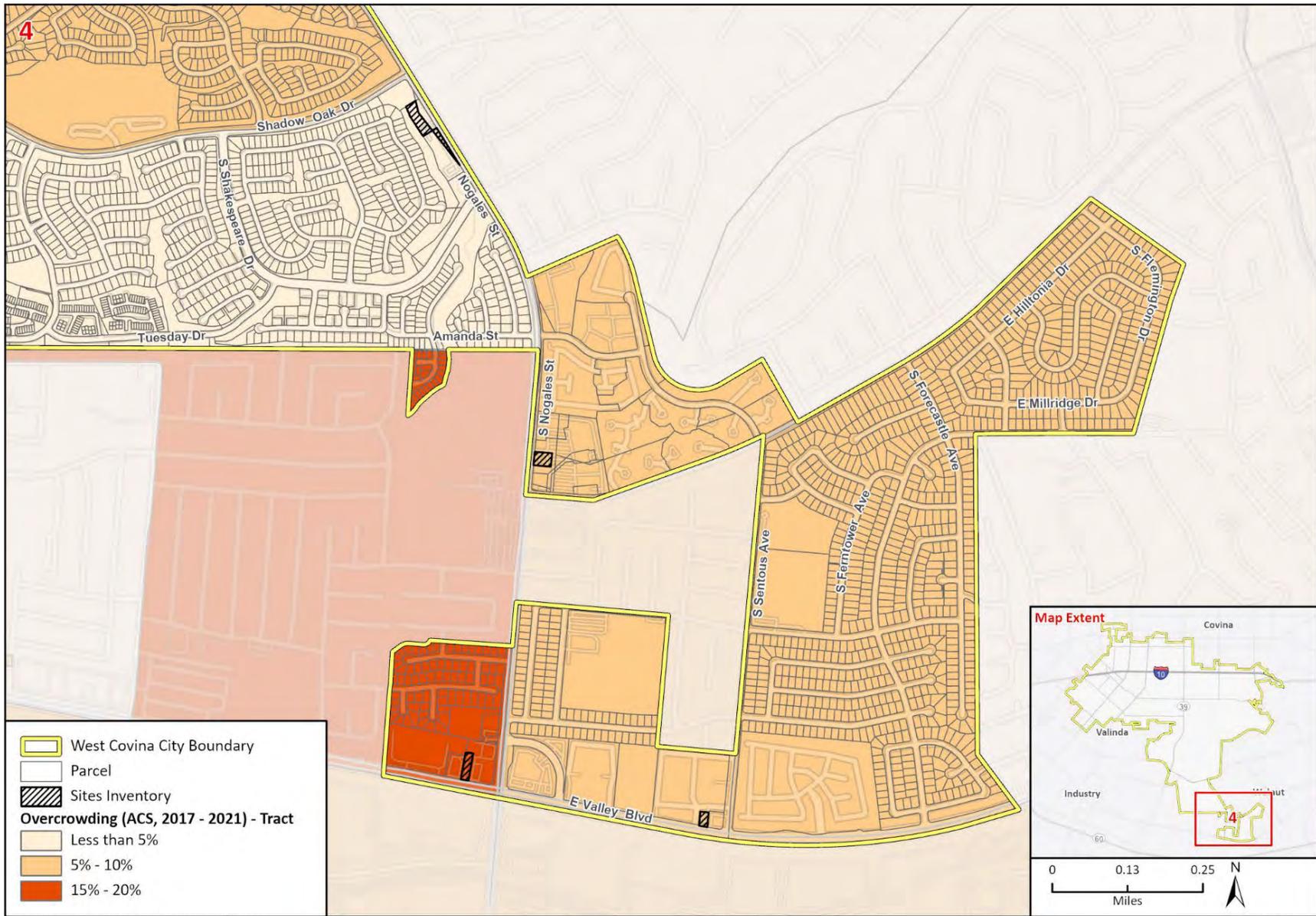
Additional data provided by LA County, 2023; ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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 Fig X AFFH Sites Inventory - Area 3

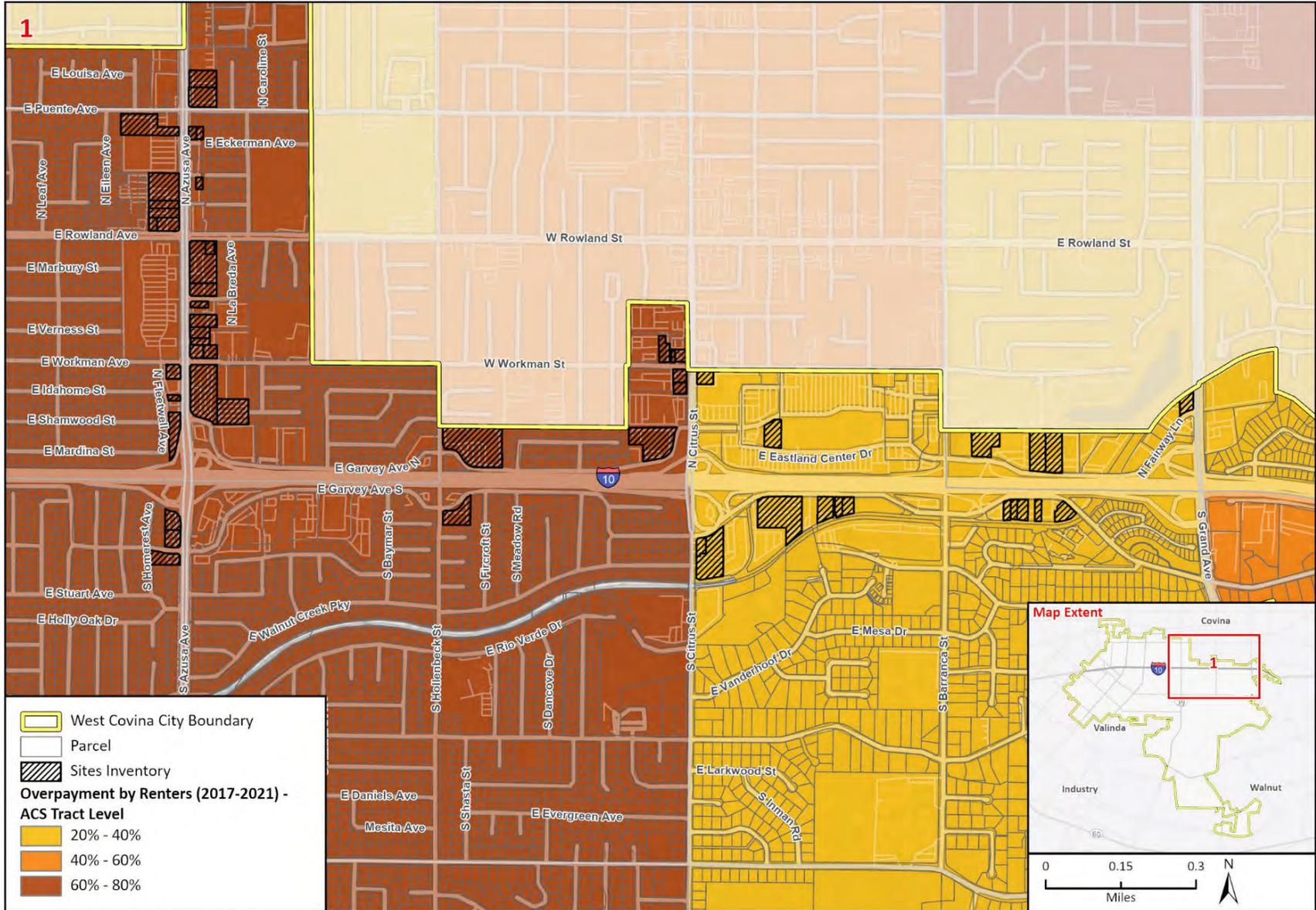


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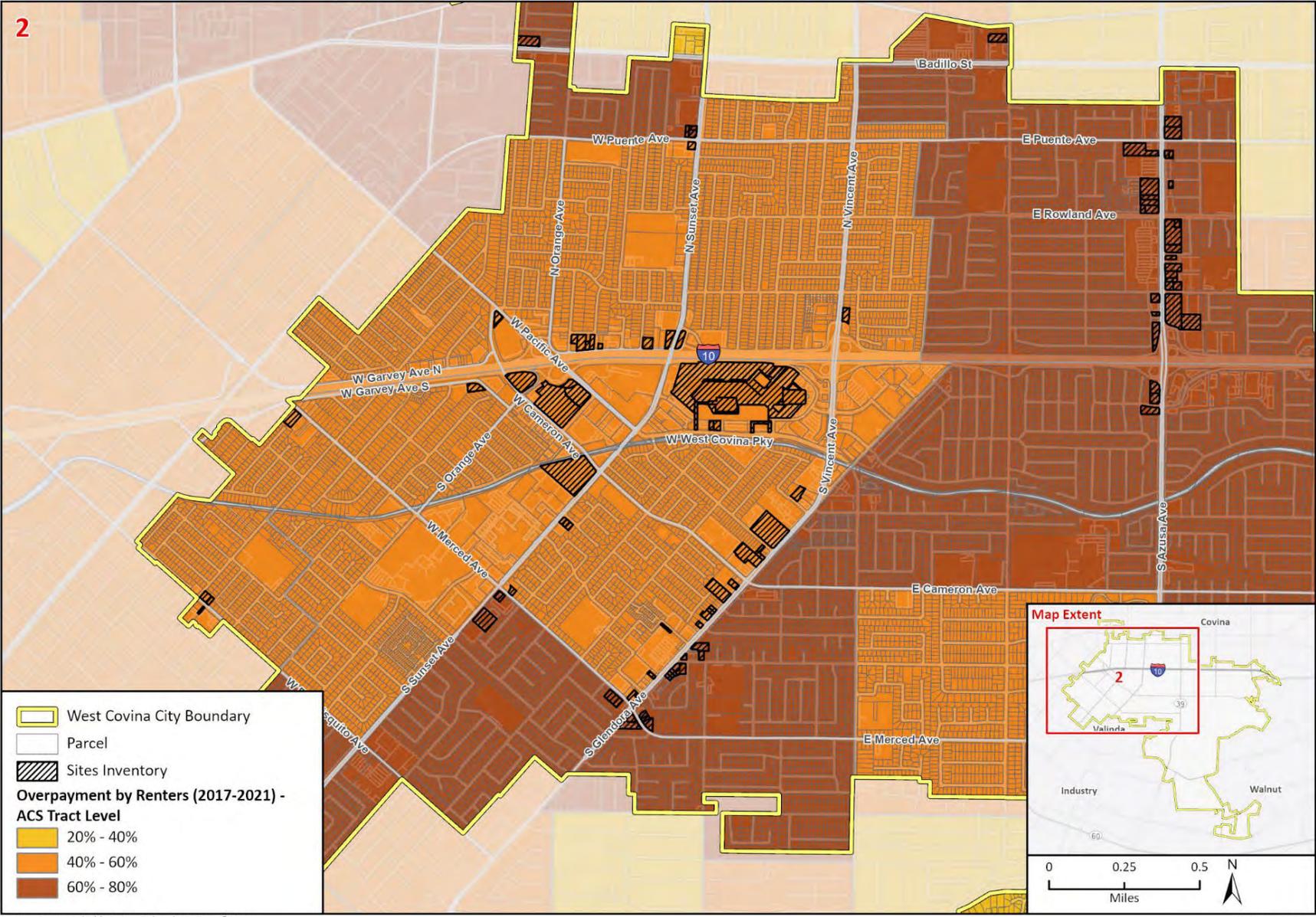
Additional data provided by LA County, 2023; ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Fig X AFFH Sites Inventory - Area 6

Figure D-41 Housing Opportunity Sites by Overpayment by Renters – West Covina

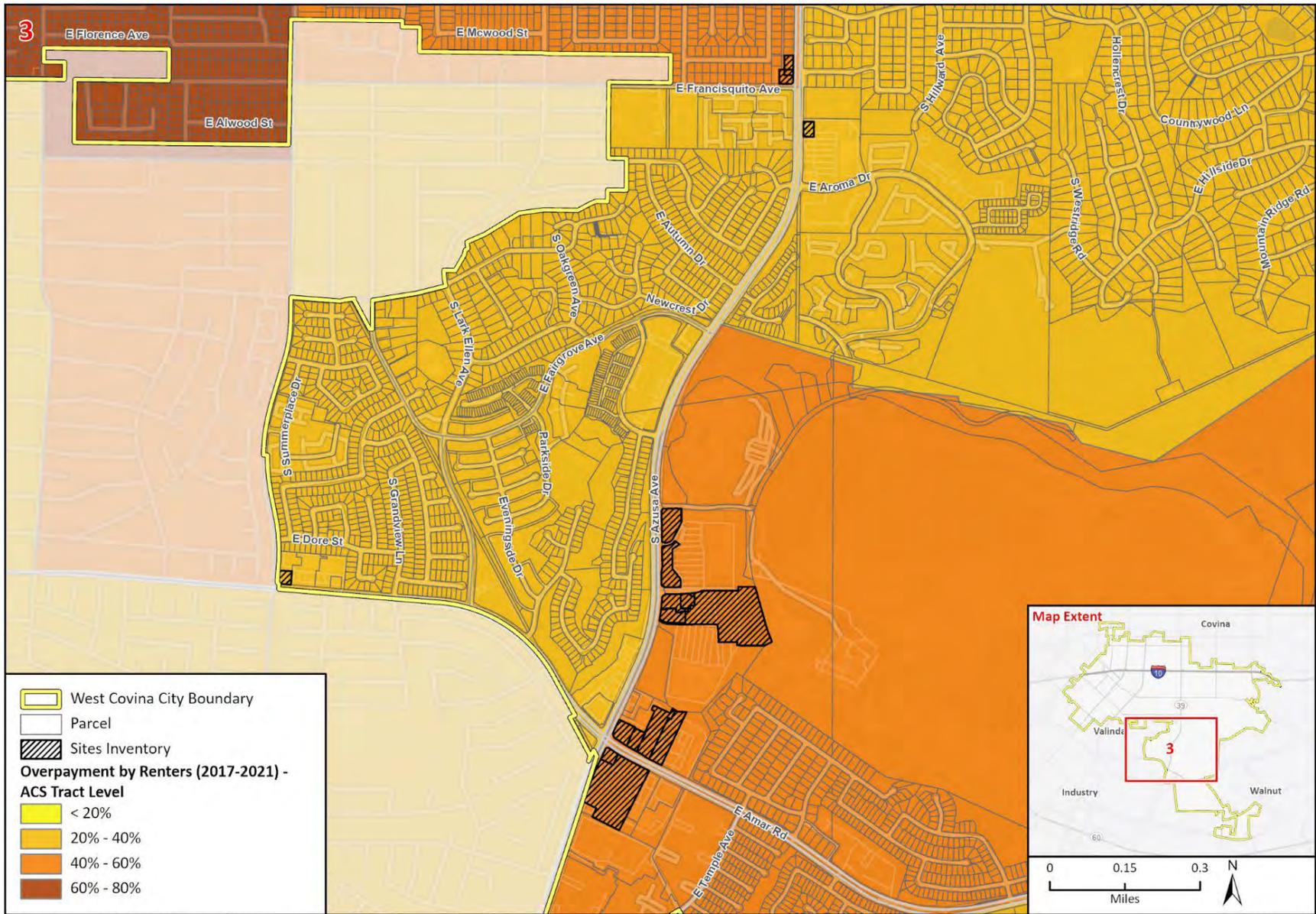


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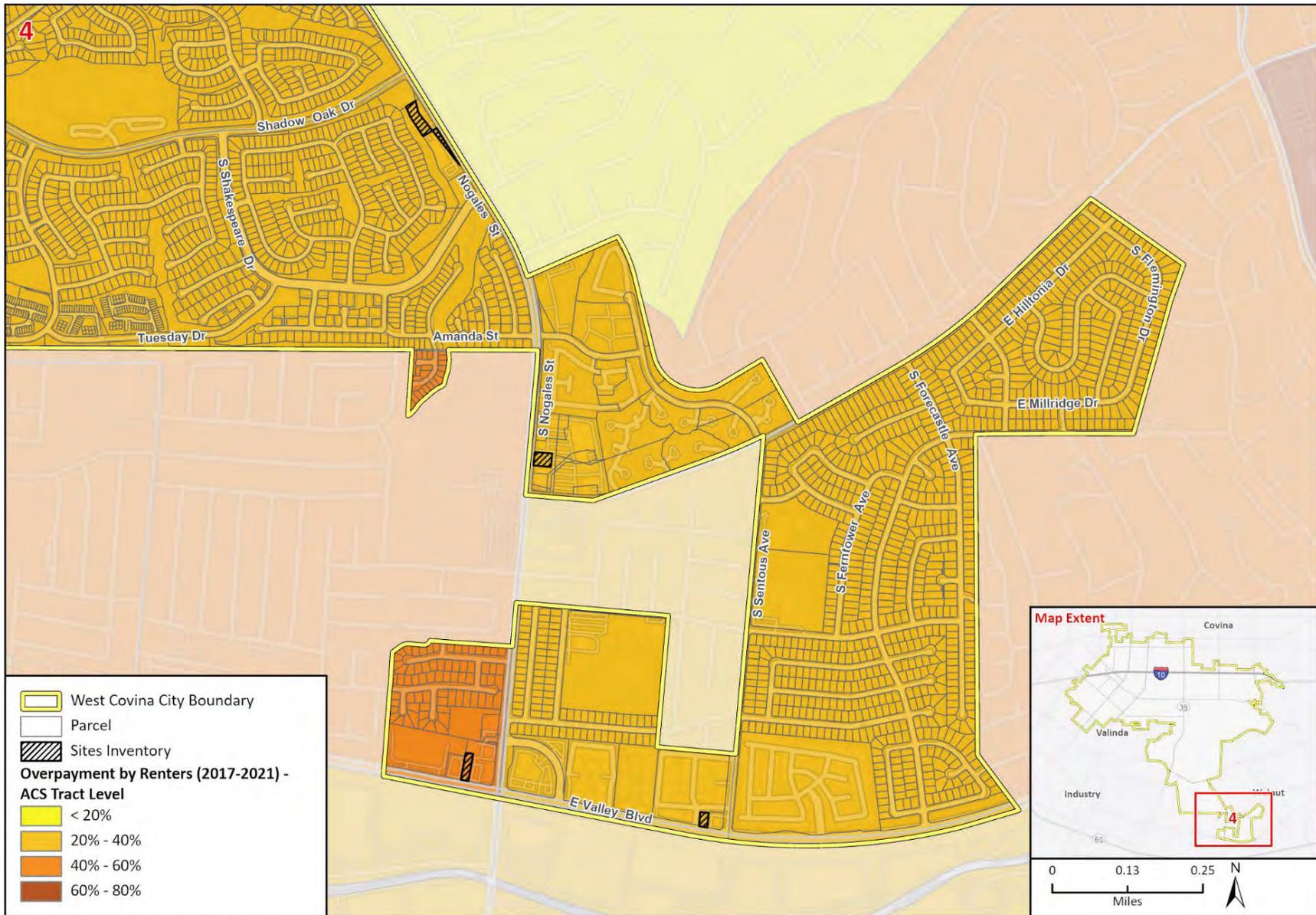
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Fig X AFFH Sites Inventory - Area 6

According to the UDP, new market-rate construction in gentrifying areas neither worsens nor eases rates of people moving out of the area. It increases rates of people moving to an area across all socio-economic groups, particularly high-socio-economic residents. The UDP recommends subsidized housing construction and housing preservation to help existing residents stay in their neighborhood. The mix of lower, moderate, and above moderate-income housing units in northern and western parts of the city will provide affordable housing options for existing lower-income residents as well as encourage higher-income households to move into the area. The Site Inventory will not exacerbate overpayment by renters but will add new housing opportunities in areas that need them.

D.6.6 Sites by Areas of Integration and Segregation

There are no areas of high segregation and poverty in West Covina and only a small portion of the city is in a low-resource area (this area is approximately 2 acres in size and is in a census tract that mostly consists of land outside of West Covina). Census Tract 4062.01 has a high percentage of non-White residents in the city (80 percent) and the lowest median household income in the city (\$38,182). A total of 61 moderate-income housing units (5 percent of total moderate-income units) and 174 above moderate-income housing units (9 percent of total above moderate-income units) are proposed in Census Tract 4062.01. Figure D-42 shows the housing opportunity sites by percent non-white residents. The Sites Inventory will not contribute to segregation based on race/ethnicity or income level.

Approximately 11 percent of the population has one or more disabilities. For persons with disabilities who live independently or with other family members, independent living can be supported with special housing features, financial support, and in-home supportive services. The location of housing is also an important factor for people with mobility restrictions who rely on public transportation for travel. Census Tract 4062.01 has the highest percentage of residents with a disability (23 percent), while most other areas of the city have a disability rate of 12 percent or below. Housing opportunity sites in Census Tract 4062.01 would add a total of 61 moderate-income housing units (5 percent of total moderate-income units) and 174 above moderate-income housing units (9 percent of total above moderate-income units) in areas in proximity to transit stops. This will allow more residents to live near transit and create housing opportunities for residents who are unable to drive.

D.6.7 Sites by Communities Vulnerable to Displacement

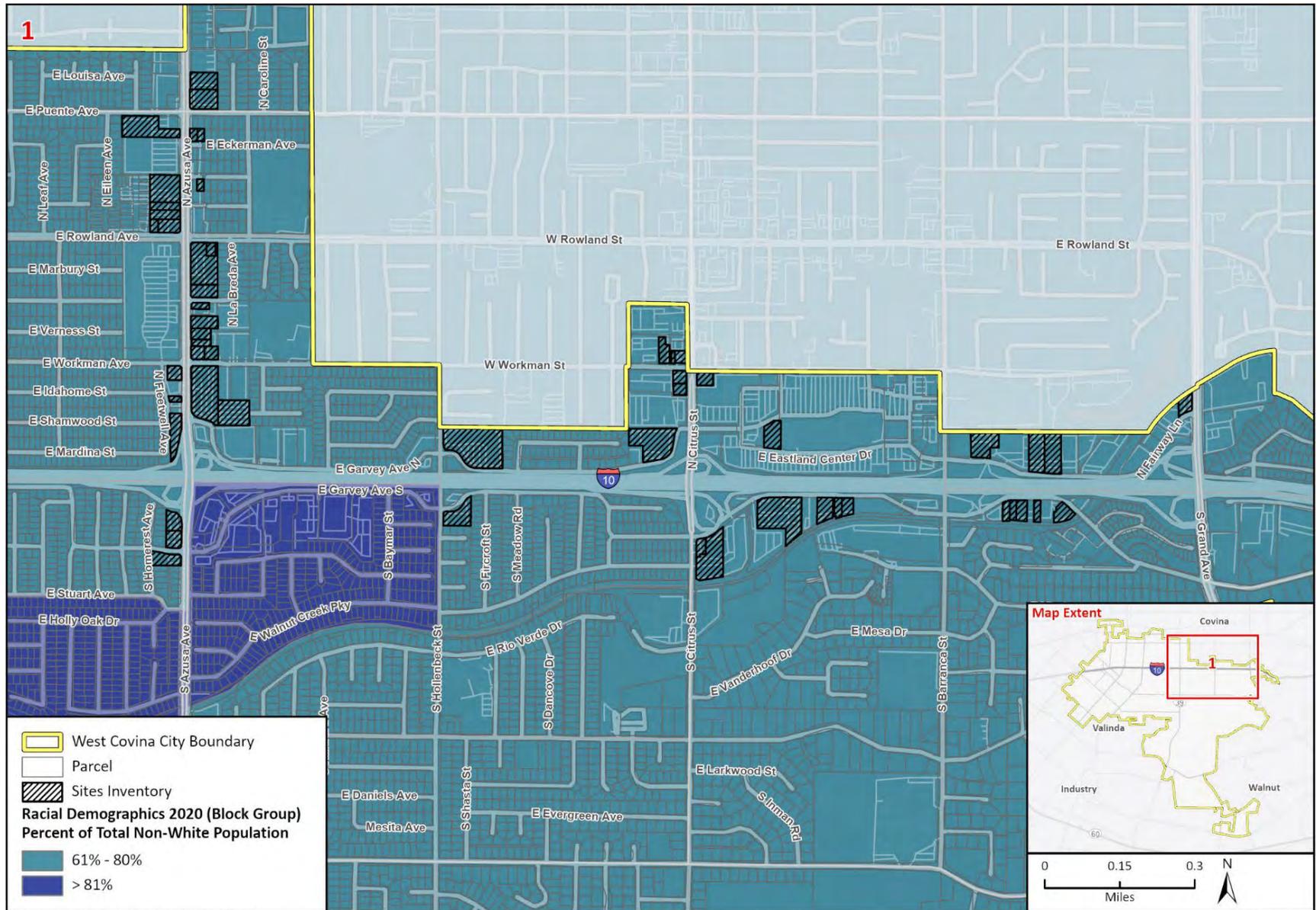
The entire city has a low risk of displacement according to the UDP. However, northern and western parts of West Covina have high rates of cost burden among renter households (40 to 80 percent). The housing opportunity sites will accommodate all of the proposed lower-income units (2,590 units), 94 percent of moderate-income units (1,201 units) and 83 percent of above moderate-income units (1,547 units) in census tracts where 50 percent or more of residents are low- or moderate-income. Units accommodating a mix of income levels will provide additional housing opportunities to households of all income levels. In particular, the lower-income units will provide affordable housing options for existing very low and low-income residents at risk of displacement.

D.6.8 Sites by CalEnviroScreen Score

Pollution burden is high throughout West Covina. Almost every census tract in the city has a CalEnviroScreen percentile score of 50 or higher. As such, 98 percent of units proposed by the site inventory are in census tracts in the 50th percentile or higher. Census tracts with a CalEnviroScreen percentile score of 75 or higher are located in the northern and western part of the city.

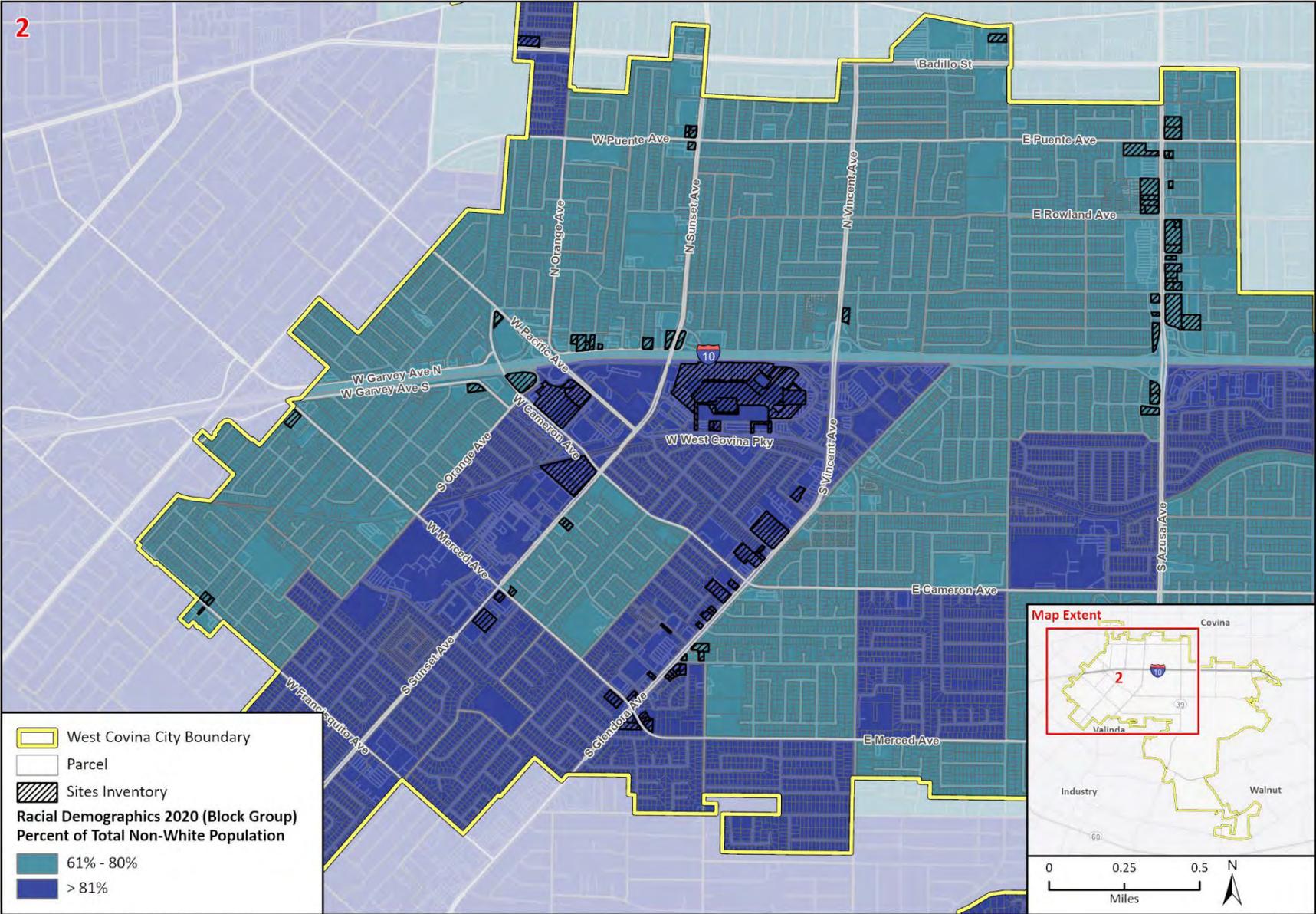
Approximately 4,549 housing units (79 percent of total proposed housing units) are located in census tracts with a CalEnviroScreen percentile score greater than 75. Figure D-43 shows the housing opportunity sites by CalEnviroScreen score. Housing opportunity sites in census tracts with CalEnviroScreen scores greater than 75 are located can accommodate 96 percent of the lower-income housing units (2,485 units), 79 percent of the moderate-income housing units (1,012 units), and 1,052 of the above moderate-income housing units (56 percent). While the site inventory proposes the majority of lower-income units in census tracts with higher CalEnviroScreen percentile scores, these units are intended to accommodate low-income households that already exist in these neighborhoods that are experiencing cost burden and overcrowding and to protect existing low-income households from displacement.

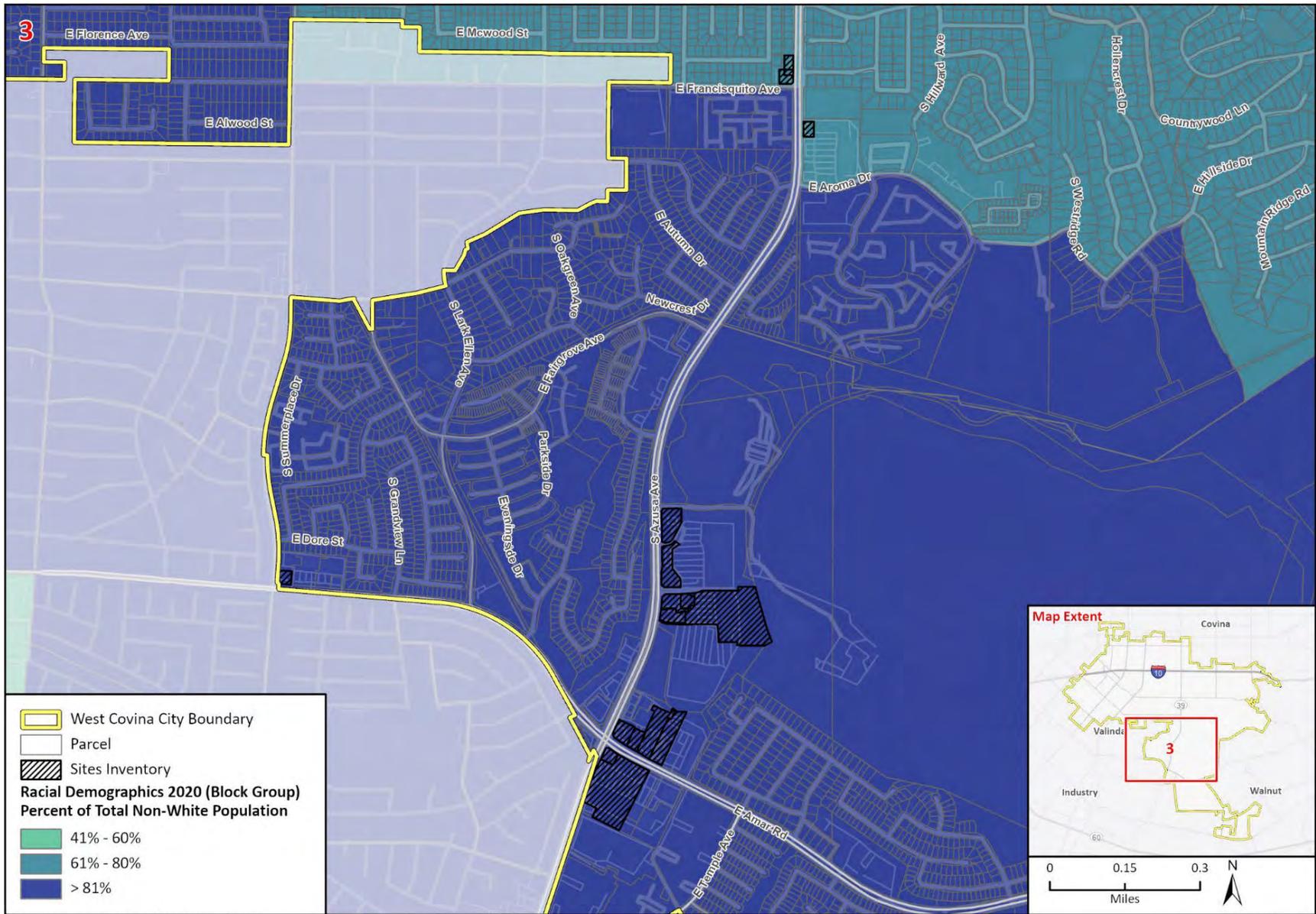
Figure D-42 Housing Opportunity Sites by Total Non-White Population – West Covina



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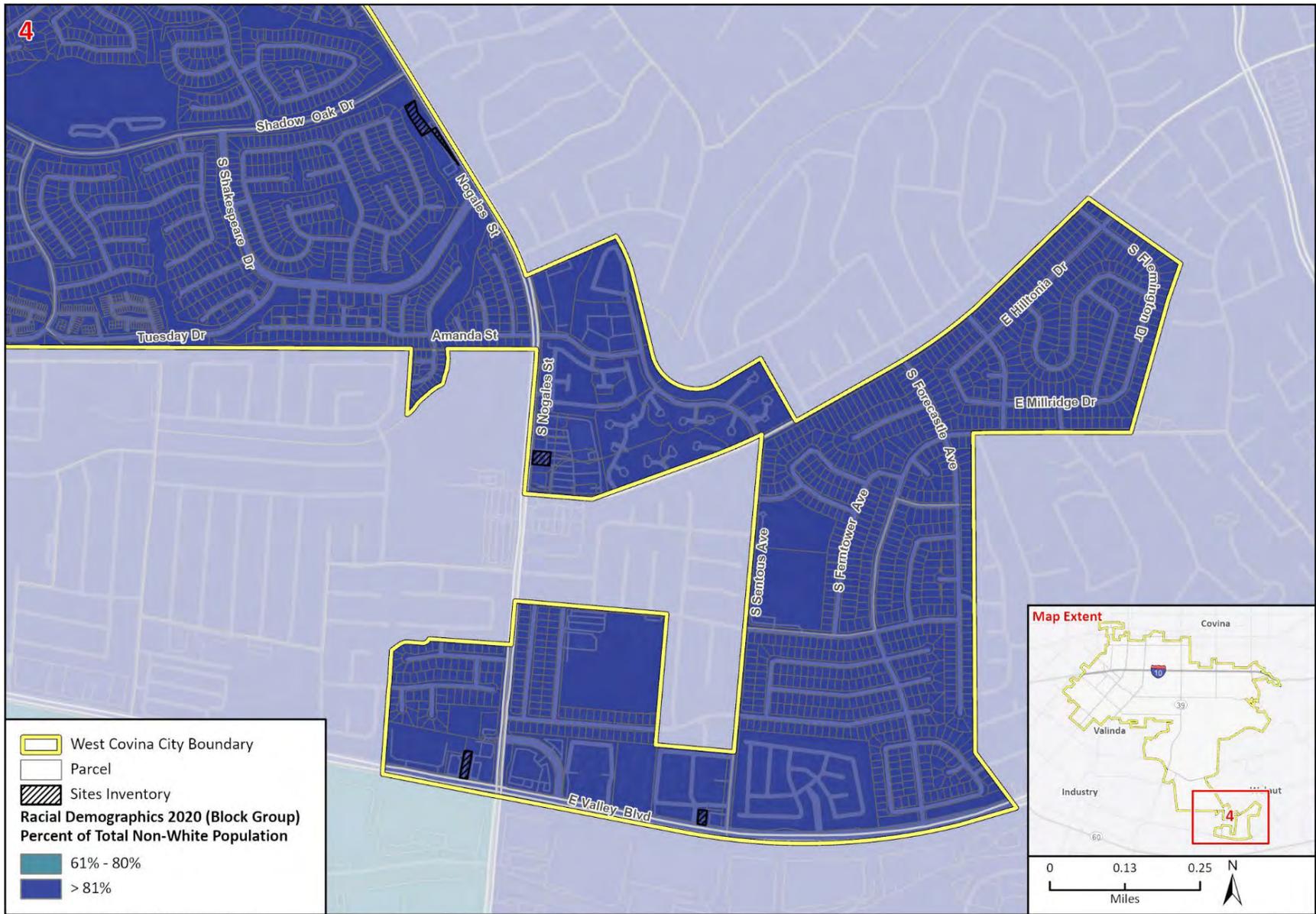




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23-14758 HE_AFFH
Fig X AFFH Sites Inventory - Area 3

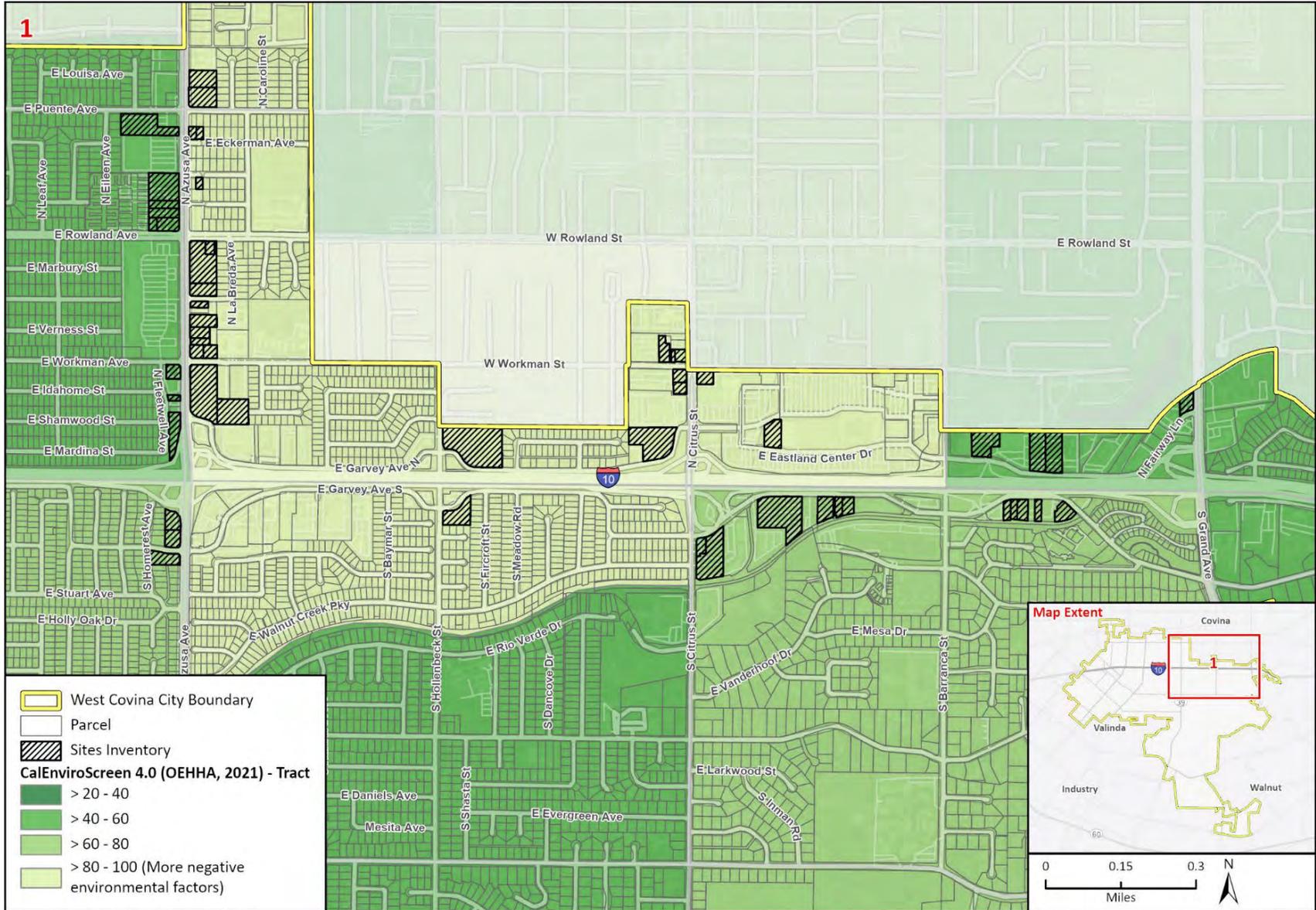


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Figure D-43 Housing Opportunity Sites by CalEnviroScreen Percentile Score – West Covina



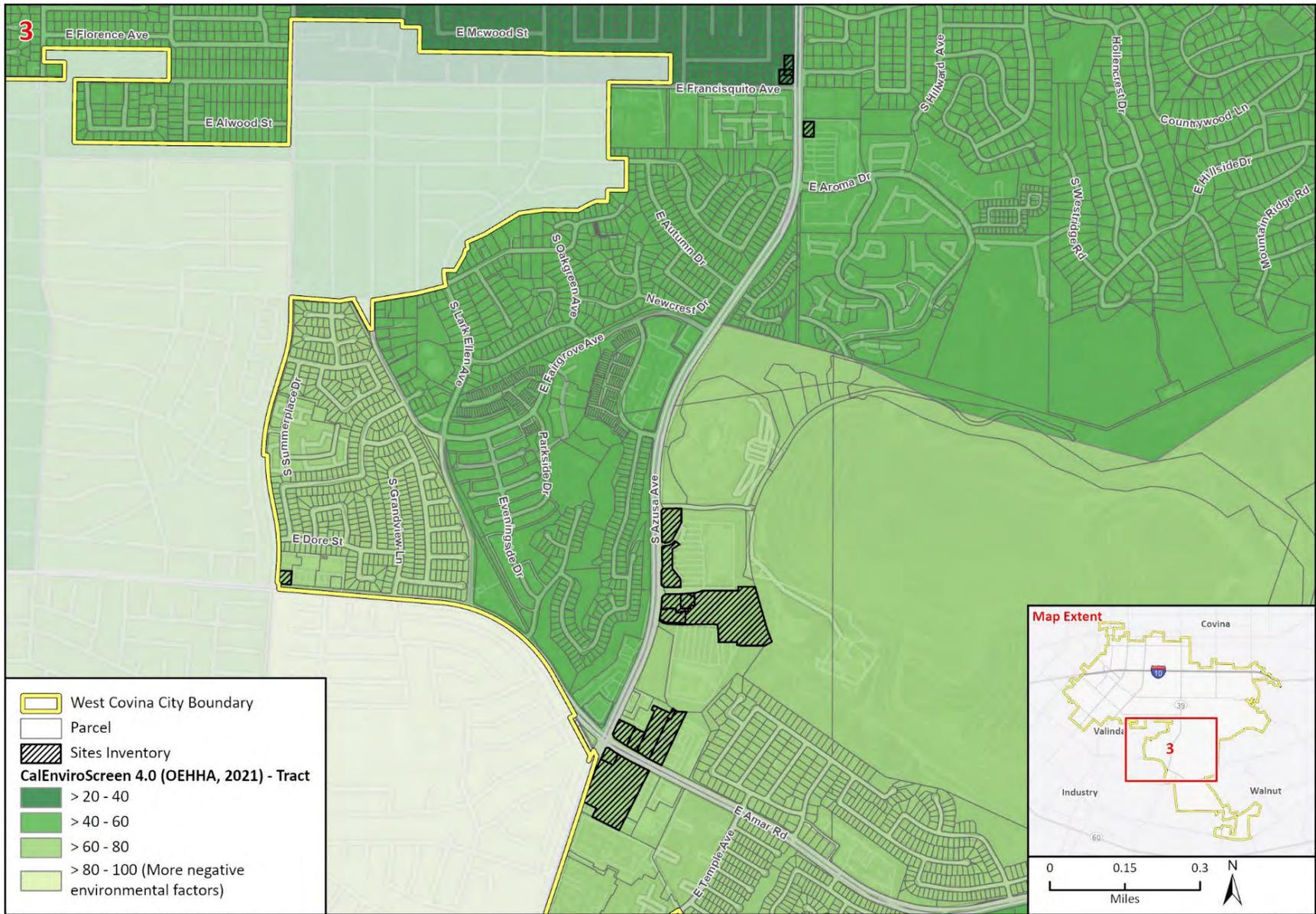
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 Fig X AFFH Sites Inventory - Area 2



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23-14758 HE_AFFH
Fig X AFFH Sites Inventory - Area 4

Census Tract Number	Number of Existing Households	Sites Inventory Capacity (Units)			AFFH Indicators										
					Segregation and Integration					Access to Opportunity			Disproportionate Housing Needs		
		Low-Income	Moderate-Income	Above Moderate-Income	Median Income	Poverty Rate	Percent LMI Households	Percent Non-White Population	Percent Disability	TCAC Resource Designation	CalEnviroScreen Percentile	Overcrowding (Percent)	Cost Burden by Renters (Percent)	Cost Burden by Homeowner (Percent)	Displacement Risk
6037403601	2194	0	26	60	\$100,128	9.3	31.38	68.18	9.7	High Resource	49.63	4.65	24.2	48.1	Lower Displacement Risk
6037405301	957	0	7	30	\$68,603	11.6	69.24	74.06	10.6	Moderate Resource	55.86	8.67	64	26.4	Lower Displacement Risk
6037405302	1,579	0	11	58	\$86,238	7.6	35.78	76.24	7.6	Moderate Resource	76.64	6.90	41	45.8	Lower Displacement Risk
6037405500	1,854	0	3	16	\$76,842	9.6	47.91	73.20	12.1	Moderate Resource	57.39	7.07	50.2	39.8	Lower Displacement Risk
6037405600	1,677	0	36	100	\$88,493	5.9	46.35	76.14	9.6	High Resource	52.82	6.38	63.6	33.3	Lower Displacement Risk
6037406201	1,258	0	61	174	\$38,182	25.7	54.32	79.87	23.1	Moderate Resource	81.22	4.37	68.6	37.7	Lower Displacement Risk
6037406300	1,845	0	41	151	\$110,541	7.6	54.32	69.00	10.8	Moderate Resource	81.22	8.73	38	48.5	Lower Displacement Risk
6037406413	2,055	0	46	128	\$88,695	5.1	54.32	79.85	12.6	Moderate Resource	81.22	2.00	77.1	42.9	Lower Displacement Risk
6037406500	1,917	0	27	107	\$98,221	5.7	44.69	77.77	13.4	High Resource	71.62	10.28	66.1	35.7	Lower Displacement Risk
6037406601	1,432	0	0	12	\$105,833	12.4	29.78	79.93	13.8	High Resource	26.89	6.15	48.5	40.9	Lower Displacement Risk
6037406602	1,274	0	8	70	\$94,728	14.1	43.49	82.13	13.8	High Resource	57.50	5.34	76.6	33.9	Lower Displacement Risk
6037406701	913	0	14	40	\$96,771	5.2	42.2	82.29	11.1	Moderate Resource	71.38	8.76	63.7	33	Lower Displacement Risk
6037406702	1,962	2,485	852	540	\$97,857	8.2	63.82	81.95	9.9	Moderate Resource	81.35	7.59	54.5	40.9	Lower Displacement Risk
6037406801	1,277	106	29	41	\$107,530	7.5	29.26	76.59	14.6	High Resource	72.15	4.23	56	34.3	Lower Displacement Risk
6037406903	2,082	0	0	12	\$83,833	14.7	44.84	79.57	10.4	Moderate Resource	63.92	7.73	56.4	32.9	Lower Displacement Risk
6037407902	524	0	0	7	\$93,111	5.1	51.33	88.19	17.6	Moderate Resource	66.23	0.95	39.5	52.5	Lower Displacement Risk
6037408005	1,673	0	0	6	\$119,175	6.6	24.3	77.87	8.5	High Resource	40.67	0.00	32.9	34.7	Lower Displacement Risk
6037408006	1,020	0	85	204	\$86,897	13.4	58.07	88.05	9.9	Moderate Resource	65.65	10.98	52.3	28.5	Lower Displacement Risk
6037408133	1,631	0	33	83	\$83,011	11.7	60.02	86.09	9	Moderate Resource	71.18	8.40	54.1	18.4	Lower Displacement Risk
6037408135	1,331	0	4	8	\$77,208	18.5	36.14	88.33	8.6	High Resource	48.34	1.50	26.2	49.7	Lower Displacement Risk
6037408137	1,396	0	0	9	\$86,329	11.6	57.63	80.24	12.1	Moderate Resource	62.30	6.38	34.4	50.4	Lower Displacement Risk
6037408141	974	0	2	4	\$89,568	3.9	63.61	83.95	7.1	Low Resource	67.30	17.25	45.9	41.5	Lower Displacement Risk

D.7 Contributing Factors, Goals, Policies and Actions

The Housing Element AFFH analysis must include an identification and prioritization of significant contributing factors to segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs. “Fair housing contributing factor” means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all the prior efforts and analyses: outreach, assessment of fair housing, and site inventory. Contributing factors must also be prioritized in terms of needed impact on fair housing choice and strongly connect to goals and actions.

Through the participation of stakeholders, fair housing advocates, and the assessment of fair housing issues described in this appendix, the City has identified fair housing issues and contributing factors as well as meaningful actions to address those issues as described in Table D-7 below. Program 4.1 in the Housing Plan incorporates specific measures to implement these actions.

Enforcement and Outreach

The following contributing factors were identified as high priorities during the fair housing analysis:

- Housing discrimination based on race/ethnicity, disability status, income status (High Priority)
- Lack of sufficient outreach and education on fair housing rights and resources (High Priority)

Segregation and Integration Patterns and Trends

- Lack of sufficient affordable housing (High Priority)
- Need for housing and supportive services for homeless individuals
- Housing discrimination based on race/ethnicity, disability status, income status (High Priority)

Racially and Ethnically Concentrated Areas of Poverty

There are no R/ECAPs/RCAAs in West Covina. Areas of the city do have an overlap of lower median household income and a higher percentage of non-White residents. However, the entire city has a high percentage of non-White residents (89 percent) and areas with lower median incomes have a similar share of non-White residents compared to the overall population.

Disproportionate Housing Needs

- Loss of existing affordable housing units as subsidy contracts expire (High Priority)
- High rent costs (High Priority)

Disparities in Access to Opportunities

- Lack of access to economic and education opportunities (High Priority)
- Lack of access to transit in northern and central parts of the city (Medium Priority)

Table D-7 Fair Housing Issues, Contributing Factors and Meaningful Actions

Fair Housing Issues	Contributing Factors	Priority	Meaningful Actions
<p>Anti-Discrimination and Fair Housing Outreach</p>	<p>Some residents who are affected by discriminatory actions, including low-income households, persons with disabilities, racial/ethnic minorities, and other protected classes are in need of fair housing resources but may be unaware of the resources that are available. Although information about fair housing services is posted on the City website and in public offices, more could be done to make this information available.</p>	<p>High</p>	<ul style="list-style-type: none"> • Partner with the Housing Rights Center to provide fair housing services and education. <ul style="list-style-type: none"> ○ Provide informational seminars to area residential real estate agents and brokers on fair housing laws and regulations. ○ Work with tenants and tenant advocates to identify violations of fair housing federal and State fair housing laws and support prospective and existing tenants who are experiencing discrimination. ○ Provide trainings for property owners/managers on the requirements of federal and state fair housing laws to prevent discrimination. (Action 4.1-a) • Facilitate the development of housing for persons with disabilities (including developmental disabilities) through incentives including streamlined processing and providing resources and assistance for affordable housing development. (Action 4.2-a) Add information on fair housing laws and resources on the City’s website regarding housing programs in several languages. Post fair housing information at the Senior Center. Publish links to fair housing information via social media. (Action 4.1-h) Collaborate with LACDA and promote the Section 8 voucher program to landlords and residents with the goal of increasing the number of vouchers used. Connect affordable housing developers to Project-Based Section 8 vouchers when they are available to their developments in West Covina. (Action 2.3-a)With the Housing Rights Center, support an annual Fair Housing Audit Report that assesses typical or timely market-based suspected areas of discrimination. (Action 4.1-e)
<p>Expanding Access to Affordable Housing and Homeless Services</p>	<p>Approximately 50 percent of renters and 32 percent of homeowners spend more than 30 percent of their income on housing. In addition, 48 percent of households in West Covina are lower-income and the city’s median household income is 20 percent lower than Los Angeles County’s. This indicates that there is a high demand for affordable housing in the city.</p>	<p>High</p>	<ul style="list-style-type: none"> • Collaborate with LACDA and promote the Section 8 voucher program to landlords and residents with the goal of increasing the number of vouchers used. Connect affordable housing developers to Project-Based Section 8 vouchers when they are available to their developments in West Covina. (Action 2.3-a)Assist and educate homeowners by posting pre-approved ADU/JADU Standard Plans in English and Spanish on the City’s website by January 2025. • Update City website by January 2024 to provide link to California Housing Finance Agency (CHFA) ADU program that provides \$40,000 in grant for predevelopment costs to income-eligible property owners. (Action 3.2a) • Annually monitor the City’s remaining housing capacity to ensure compliance with the City’s obligation to affirmatively further fair housing. Maintain a Site Inventory and make it available to developers. Actively promote available parcels appropriate for development that can accommodate low-income and/or moderate-income households to private or non-profit housing providers to support the RHNA of 1,653 very low-income units, 850 low income

Fair Housing Issues	Contributing Factors	Priority	Meaningful Actions
			<p>units, 865 moderate income units, and 1,978 above moderate-income units. (Action 5.1-b) Maximize the density potential of limited land resources by promoting residential densities that achieve the highest allowable density for specific properties, particularly within 0.25-mile of high-quality public transit stops. (Action 5.2-a)</p> <ul style="list-style-type: none"> Proactively engage private and non-profit affordable housing developers to solicit interest in acquiring and converting existing and unregulated naturally occurring housing to long-term regulated affordable housing for low- and moderate-income households. (Action 2.1-a) Pursue federal, state, and regional funds for homeless service providers that operate temporary, permanent, and emergency shelters in the city that assist persons experiencing homelessness and at risk of becoming homeless. Consult with local community-based organizations and stakeholders to inform the design and development of homeless services, programming and needs assessments. (Action 4.3-a) Provide financial and technical support to non-profit organizations to rehabilitate or develop affordable housing for extremely low-income households and persons at risk of experiencing homelessness. Expedite permit processing for the development of such units. (Action 4.3-c) Seek resources for the acquisition/rehabilitation and operations of Permanent Supportive Housing that offers appropriate services so that people experiencing chronic homelessness can maintain permanent housing, including finding opportunity sites and dedicating City affordable housing funds. Permanent Supportive Housing should include either on- or off-site case management for mental and physical health, addiction treatment, social services, and jobs skills development. (Action 4.3-e)

Fair Housing Issues	Contributing Factors	Priority	Meaningful Actions
Affordable Housing Preservation	The loss of existing affordable housing may be a significant contributing factor to fair housing and potential displacement. When subsidy contracts expire, the housing providers that often have the least economic incentive to renew their affordability restrictions are those that are located in higher opportunity areas or in areas that are gentrifying or at risk of gentrification. There is one subsidized low-income development in West Covina with affordability restrictions that could expire in the next 10 years. If affordability covenants are not extended, the loss of these affordable units could contribute to segregation and displacement.	High	Monitor the status of the 96 units at risk of conversion to market-rate units published in the Risk Assessment report published by the California Housing Partnership Corporation and seek to preserve these affordable units for extremely low-income households and very low-income households. Work with the owners of existing affordable housing with expiring affordability covenants that are scheduled for conversion to discuss the City's desire to preserve affordable housing. Inform property owners of their obligation to comply with noticing requirements stipulated under state law to ensure that qualified non-profit entities from the state's qualified entities list are informed of the opportunity to acquire the affordable property and that tenants are informed about their rights and potential resources. (Action 1.2-a)
Access to Opportunity	Lack of access to opportunity due to high housing costs is a significant contributing factor to fair housing throughout the Los Angeles County. In West Covina, while access to public transportation and other resources is generally good, some portions of the city have lower economic, educational, and environmental opportunity. Increasing housing opportunities in areas with good opportunity would make it easier for low-income households to access the types of services and amenities that further social mobility.	High	<ul style="list-style-type: none"> ▪ Encourage Developers to apply for funds to provide financial incentives for property owners to implement environmentally friendly building improvements in existing and new construction, such as solar panel installation and energy and water efficiency upgrades, induction cooking, and outdoor water conservation techniques, with priority given to units affordable to lower and moderate-income households. (Action 1.3-a) ▪ Support infrastructure for public transit and active transportation such as walking and biking in areas designated for housing opportunities, prioritizing areas designated by TCAC as low resource areas. The infrastructure project priority checklist will designate funds for public transit and active transportation projects that prioritize communities and corridors in E Imperial Highway/S Harbor Boulevard, Artesia Boulevard/ N Gilbert Street, Gilbert Park, Rancho La Paz, Woodcrest Park, and areas listed in the Site Inventory that are designated for housing opportunity sites that can accommodate at least 30 units of affordable/low-income housing. (Action 1.3-b) ▪ Increase resident participation in programs designed to reduce household energy costs, particularly home weatherization programs and utility tax exemptions or discounts geared toward lower-income households. Promote GRID alternatives, use of Energy Star®-rated appliances, and energy service provider SCE to provide energy improvements, prioritizing resources for low- and moderate-income households and explore resources that provide financing for homeowners making energy and water efficiency improvements. (Action 1.3-c)

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