

# City of West Covina



## 2021-2029 Housing Element

Draft | November 2021



# City of West Covina

2021-2029 Housing Element

**Adopted** \_\_\_\_\_  
**Resolution** \_\_\_\_\_

# Acknowledgements

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## **City Council**

Letty Lopez-Viado, Mayor  
Dario Castellanos, Mayor Pro Tem  
Rosario Diaz, Councilmember  
Brian Tabatabai, Councilmember  
Tony Wu, Councilmember

## **Planning Commission**

Livier Becerra, Chair  
Nickolas Lewis, Vice Chair  
Brian Gutierrez, Commissioner  
Shelby Williams, Commissioner  
Sheena Heng, Commissioner

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## Section 1

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# Introduction

### 1.1 Housing Element Purpose

State law requires every jurisdiction in California to adopt a General Plan, including a Housing Element. The Housing Element 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.

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 City commitments 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.

### 1.2 General Plan Consistency

The Housing Element is one of the required seven elements of the West Covina General Plan. 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. Through 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 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.

The Housing Element utilizes the recent data published by the U.S. Census Bureau, particularly American Community Survey estimates.

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 Housing Element Update is described in Appendix C.

### 1.4 Housing Element Organization

This Housing Element is an update to the City's 2013-2021 Housing Element and has been revised to address current housing needs, conditions, and changes in State law. To address the State requirements, the Housing Element has been divided into the following sections:

1. **Housing Plan** to address West Covina's identified housing needs, including housing goals, policies, programs and objectives.
2. **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;
3. **Housing Constraints** examining governmental and non-governmental constraints on the production, maintenance, and affordability of housing;
4. **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

## Section 2

# Housing Plan

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 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.

## 2.1 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% 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 solicit applications.

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

**Time Frame:** Ongoing, 2021-2029

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

**Objectives:**

- Investigate new funding sources, annually evaluate opportunities, and administer funds as they become available.
- Promote energy efficiency improvements to households participating in the Housing Preservation Program.
- Continue to provide informational materials about the HPP at City Hall, on the City's website and in other public places to increase awareness.
- When funding is available, advertise the HPP and other programs in the City's newsletter (Discover West Covina).

## **Program 1.2 – Monitor and Preserve Affordable Housing**

West Covina currently has one deed-restricted affordable multi-family housing complex with 84 units with affordability covenants that could expire during the next 10 years. The City will work cooperatively with the property owner and other entities to facilitate the preservation of these affordable units to the extent feasible.

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

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Sources:** General Fund

**Objectives:**

- Preserve existing affordable units.

## **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.

**Responsible Agency:** West Covina Community Development Department, Planning Division

**Time Frame:** Ongoing, 2021-2029. The City will continue to monitor technology advances and new materials and equipment and review new ordinances when appropriate.

**Potential Funding Sources:** General Fund

**Objectives:**

- Maintain and distribute literature on energy conservation, including solar power, additional insulation, and subsidies available from utility companies, and encourage homeowners and landlords to incorporate these features into construction and remodeling projects.
- Encourage energy conservation devices, including but not limited to lighting, water heater treatments, and solar energy systems for all residential projects.
- Encourage maximum utilization of Federal, State, and local government programs, such as the County of Los Angeles Home Weatherization Program, that assist homeowners in providing energy conservation measures.
- Continue to provide information on home loan programs available through the City and encourage residents to use the programs to implement energy efficient design.

- Continue to partner with Southern California Edison to offer homeowners opportunities to reduce energy usage and in turn the City's carbon footprint.

## 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.

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

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Source:** Departmental Budget, CDBG funds

**Objectives:**

- Continue to implement the Community Enhancement program to bring substandard housing units into compliance with City building and property maintenance codes.
- Enforce and expand where necessary, the property maintenance provisions embodied in the California Green Building Code and the Zoning Ordinance to conserve and improve the quality of the housing units in the City.

**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 of West Covina'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.

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

**Time Frame:** Ongoing; 2021-2029

**Funding Sources:** New funding sources needed

**Objectives:**

- Investigate new funding sources, annually evaluate opportunities, and administer funds as they become available. If, and when, a permanent funding source is identified, the City will provide information at City Hall, on the City's website and in other public places to increase awareness.
- Continue to provide financial and regulatory incentives to increase the supply of affordable housing.
- Assist developers in the assemblage of property and, as appropriate and necessary; provide land write-downs for affordable housing developments.

## Program 2.2 – Affordable Housing Financing

The California Housing Finance Agency (CalHFA) provides financing programs that create safe, decent and affordable housing opportunities for low- and moderate-income Californians. Established in 1975, CalHFA was chartered as the State's affordable housing bank to make low-interest loans through the sale of tax-exempt bonds. CalHFA offers a variety of programs for multi-family developers to first time home buyers. As the City of West Covina has little control over how CalHFA's programs are administered, the City will be responsible for providing program information on the City's website, in the City's newsletter (Discover West Covina) and at City Hall.

**Responsible Agency:** West Covina Community Development Department

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Source:** General Fund

**Objectives:**

- Provide informational materials about the 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.
- On an annual basis solicit qualified developers and financial institutions that are interested in participating.

## Program 2.3 – Alternative Housing Models

The City recognizes that seniors and persons with disabilities may require alternative forms of housing. To meet the needs of these groups, the City will encourage the provision of innovative 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. Such facilities bridge the gap between independent living and nursing homes, and offer residents help with daily activities such as eating bathing, dressing, laundry, housekeeping, and assistance with medications. Assisted living can help to meet the housing and supportive services needs of West Covina's seniors and those with disabilities.

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

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Sources:** Departmental Budgets

**Objectives:**

- Facilitate the development of alternative housing models suited to the housing needs of seniors and persons with disabilities through flexible zoning regulations.
- Promote alternative housing models during discussions with developers.
- Actively promote outside funding opportunities and regulatory incentives such as density bonuses to offset the costs of providing affordable units.

## Program 2.4 – Los Angeles County Partnerships

As a means of further leveraging housing assistance, the City will cooperate with the Los Angeles County Development Authority (LACDA) to promote resident awareness and application for County-run housing assistance 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 offers a variety of housing assistance programs that can supplement the City's current housing programs. As the City has little control over how the County's programs are administered the City will be responsible for providing program information on the City's website, in the City's new letter (Discover West Covina) and at City Hall.

**Responsible Agency:** Community Development Department and Public Services Department

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Source:** General Fund

**Objectives:**

- Increase resident awareness about housing programs offered by LACDA by advertising them on the City's website, periodically in the City's newsletter (Discover West Covina) and by offering Staff assistance at City Hall.

### 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.

**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 – Reduce Development Constraints

As part of the comprehensive Development Code update the City will review residential and mixed-use regulations to identify development standards or procedures that may constrain the development of affordable housing and housing for persons with special needs. Specific Code amendments will include:

- Supportive housing - AB 2162 (2018) amended State law to require that supportive housing be a use by-right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed housing development meets specified criteria.
- Low barrier navigation centers - AB 101 (2019) added the requirement that low barrier navigation centers meeting specified standards be allowed by-right in areas zoned for mixed use and in non-residential zones permitting multi-family uses pursuant to Government Code §65660 et seq.

**Responsible Agency:** West Covina Community Development Department, Planning Division

**Time Frame:** Development Code update in 2021-23

**Potential Funding Source:** Grant funds

**Objectives:**

- Process amendments to the Development Code to update City regulations for supportive housing and low barrier navigation centers consistent with current law.

### Program 3.2 – Density Bonus

State law requires cities to allow an increase in residential density and other incentives when developments provide affordable or senior housing. Recent State legislation has amended density bonus requirements. West Covina Municipal Code Section 26-676 et seq. (Low and Moderate Income and Senior Citizen Housing) establishes City standards and procedures to implement State density bonus law. As part of the comprehensive Development Code update, the City will amend density bonus regulations in conformance with current State law. In addition,

the City will promote the use of density bonuses to facilitate production of affordable and senior housing.

**Responsible Agency:** West Covina Community Development Department, Planning Division

**Time Frame:** Development Code amendment in 2021-2022

**Potential Funding Source:** General Fund

**Objectives:**

- Amend City density bonus regulations consistent with State law (Government Code §65915 et seq.).
- Continue to promote the City's density bonus ordinance by providing informational materials at City Hall, on the City's website and in other public places to increase awareness.

### **Program 3.3 –Priority Processing for Affordable and Special Needs Housing**

Affordable housing developers often face constraints in developing affordable housing projects. One way the City can assist such developers is by providing fast-track/priority processing for low-income and special needs housing projects. This service can encourage affordable housing development by allowing developers to go through the approval and permitting process quicker keeping costs down and units affordable. It is important that following the construction of the project that units are monitored to ensure that subsequent tenants are households with special needs and/or lower income.

**Responsible Agency:** Community Development Department

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Source:** General Fund

**Objectives:**

- The City will assign senior staff to handle the projects, and staff assistance may be provided to prepare the necessary documents.
- Provide informational materials about fast-track processing at City Hall, on the City's website and in other public places to increase awareness.

### **Program 3.4 – 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, care-givers, or young adults. ADUs can also provide property owners with an additional source of income. Recent changes to State law encourage ADU production, and the City amended local ADU regulations in 2020 in conformance with State law. 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 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

**Responsible Agency:** West Covina Community Development Department, Planning Division

**Time Frame:** Ongoing throughout the planning period.

**Potential Funding Sources:** Departmental Budget

**Objectives:**

- Monitor legislation and amend City regulations as necessary to ensure consistency with State ADU law.
- Promote additional ADU development.

### **Program 3.5 – Manufactured Housing and Mobile Home Rent Control**

Manufactured housing and mobile home parks represent affordable housing resources for the City's low-income and elderly households. Manufactured housing units in West Covina are found in two mobile home parks. The City has adopted the Mobile Home Rent Control Ordinance and restricts conversion of mobile home parks to other uses. State law requires local jurisdictions to permit manufactured housing and mobile homes in all residential zones. The City will continue to permit new mobile home parks in multi-family zones and manufactured homes on permanent foundations on individual lots or in new manufactured home subdivisions. Manufactured homes on single-family lots must comply with development standards applicable to the zones in which they are located.

**Responsible Agency:** West Covina Community Development Department

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Source:** General Fund

**Objectives:**

- Encourage the provision of manufactured housing (including mobile homes) in single-family residential zones, subject to the conditions consistent with State law.
- Maintain the Mobile Home Rent Control Ordinance of 1984 to limit rent increases for mobile home spaces to retain mobile home parks as a continued source of affordable housing in the City.

### **Program 3.6 – Priority Water and Sewer Service for Affordable Housing**

In accordance with Government Code Section 65589.7, immediately following City Council adoption, the City will deliver a copy of the Housing Element to all public agencies or private entities that provide water or sewer services to properties within West Covina, including reference to the State requirement that water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households.

**Responsible Agency:** West Covina Community Development Department, Planning Division

**Time Frame:** Immediately following Housing Element adoption

**Potential Funding Source:** General Fund

**Objectives:**

- Immediately following the adoption of the Housing Element, Staff will deliver copies to all providers of sewer and water service within the City of West Covina.

## 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 to 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 SGVFHC 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.

**Responsible Agency:** West Covina Public Services Department

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Source:** Departmental Budget; Community Development Block Grants

#### Objectives:

- Continue to assist households, and refer fair housing complaints to the Housing Rights Center.
- Continue to comply with all State and federal fair housing requirements when implementing housing programs or delivering housing-related services.
- Continue to promote fair housing practices, including advertisement on the City's website, and provide educational information on fair housing to the public.
- Increase education to residents and landlords regarding fair housing laws.

### Program 4.2 – Reasonable Accommodation for Persons with Disabilities

The Fair Housing Act requires that cities and counties provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to

afford individuals with disabilities equal housing opportunities. 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, even a waiver of certain restrictions or requirements from the local government to ensure equal access to housing opportunities. Cities and counties are required to consider requests for accommodations related to housing for people with disabilities and provide the accommodation when it is determined to be “reasonable” based on fair housing laws and case law interpreting the statutes. The City of West Covina encourages and promotes accessible housing for persons with disabilities and through Municipal Code Sec. 26-298.02, which establishes procedures to consider requests for reasonable accommodation. This includes the retrofitting of existing dwelling units and enforcement of the State accessibility standards for new residential construction. Removal of architectural barriers is also an eligible improvement under the City's Home Improvement Loan Program.

**Responsible Agency:** West Covina Community Development Department, Planning Division

**Time Frame:** Ongoing 2021-2029

**Potential Funding Source:** Departmental Budget

**Objectives:**

- Continue to provide information to residents on reasonable accommodation procedures at public counters and on the City website.
- Promote the Home Improvement Loan Program as a potential funding source for persons with disabilities or the elderly to make accessibility improvements to their homes.

### **Program 4.3 – Senior Center Shared Housing**

The Senior Citizens' Center at Cortez Avenue offers a variety of services aimed at senior residents, including: help in finding home care/home chore workers; transportation; services to help those who would like help in maintaining independence in their homes, including case management; assistance with Social Security and Medicare forms/questions; volunteer opportunities; and support groups. These services are intended to allow senior residents to be independent in their own homes as an alternative to group care facilities. The City currently advertises the program on its website and will continue to administer funds as they become available.

**Responsible Agency:** West Covina Public Services Department

**Time Frame:** Ongoing, 2021-2029, subject to the availability of funds

**Potential Funding Source:** General Fund and Community Development Block Grants

**Objectives:**

- Continue to operate the housing match program through the Senior Citizens' Center at Cortez Avenue with the goal of making 10 matches a year.

### **Program 4.4 – Homeless Assistance**

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.

**Responsible Agency:** West Covina Public Services Department

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Source:** General Fund and Community Development Block Grants

**Objectives:**

- Provide in CDBG funding to care providers and associated facilities.
- Provide referrals to the local organizations that serve the homeless. Also provide informational materials about tenant and landlord housing rights at City Hall, in the City's newsletter (Discover West Covina), on the City's website and in other public places to increase awareness.

### **Program 4.5 – Housing for Persons with Disabilities**

The housing needs of persons with disabilities, including persons with developmental disabilities are typically not addressed by Title 24 Regulations. The housing needs of persons with disabilities, in addition to basic affordability, range from slightly modifying existing units to requiring a varying range of supportive housing facilities. To accommodate residents with developmental disabilities the City will seek State and Federal monies, as funding becomes available, in support of housing construction and rehabilitation targeted for persons with disabilities, including developmental disabilities. West Covina will also provide regulatory incentives, such as expedited permit processing and fee waivers and deferrals, to projects targeted for persons with disabilities, including persons with developmental disabilities. To further facilitate the development of units to accommodate persons with developmental disabilities, the City shall reach out annually to developers of supportive housing to encourage development of projects targeted for special needs groups. Finally, as housing is developed or identified, West Covina will work with the San Gabriel/Pomona Regional Center to implement an outreach program informing families within the City of housing and services available for persons with developmental disabilities. Information will be made available on the City's website.

**Responsible Agency:** West Covina Community Development Department and Public Services Department

**Time Frame:** Ongoing, 2021-2029

**Potential Funding Source:** General Fund

**Objectives:**

- Offer specific regulatory incentives throughout the planning period, when funding is available, apply for funding at least twice during the planning period to encourage development of unit specifically for persons with disabilities, will reach out annually to developers.
- Work cooperatively with the San Gabriel/Pomona Regional Center to publicize available services.

## 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. That 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.

**Responsible Agency:** West Covina Planning Division  
**Time Frame:** 2021-2029; completion of the Development Code update by 2024  
**Potential Funding Source:** General Fund

**Objectives:**

- Facilitate housing development commensurate with the RHNA allocation
- Make the vacant and underutilized residential sites inventory available to housing developers on the City's website.
- Monitor development to ensure that adequate sites are available throughout the planning period.

### **Program 5.2 – Encourage Lot Consolidation**

Parcels identified as housing opportunity sites within the Downtown range in size from approximately 0.5 acres to 7 acres 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, on its website and will evaluate requests for funding on a case by case basis.

**Responsible Agency:** West Covina Planning Division  
**Time Frame:** Ongoing, 2021-2029  
**Potential Funding Source:** General Fund

**Objectives:**

- Encourage lot consolidation of smaller parcels to accommodate projects including a minimum of 16 units at a density of at least 30 dwelling units per acre or higher.

### **Program 5.3 – Local Agency Surplus Land for Affordable Housing**

During the disposal of surplus land, the City or the Successor Agency shall negotiate in good faith with entities that respond to the local agency's offer to sell or rent surplus property, pursuant to Government Code Section 54222. Land sold for affordable housing shall be required to provide 25 percent of the units at affordable housing cost to lower-income households and to maintain the affordable housing units within the development at a cost to lower-income households for a period of at least 55 years.

**Responsible Agency:** Successor Agency of the West Covina Redevelopment Agency  
**Timeframe:** Ongoing, 2021-2029  
**Potential Funding Source:** Sale or rent of City or Successor Agency surplus properties  
**Objectives:**

- Prioritize use of surplus property sites to increase the supply of housing affordable to lower-income households.

## 2.2 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 reflect the planning period from October 5, 2021 to October 15, 2029.

It is important to note that while the City must identify quantified objectives, the City of West Covina cannot guarantee that these objectives will be met given the limitations on financial and other resources, both at the City level and for other governmental resources. Achievement of the City's assigned regional housing needs will heavily depend on a variety of factors beyond the City's control, including private decisions of property owners and developers and resources provided by State, Federal and County programs to support the needs of the extremely low-, very-low-, low-, and moderate-income households. Additionally, broad economic forces heavily influence the housing market. Accordingly, State law recognizes that cities may not achieve their assigned shares of regional housing need.

**Table 2-1 2021-2029 Quantified Objectives**

|  | Extremely Low | Very Low | Low | Moderate | Above Moderate | Total |
|--|---------------|----------|-----|----------|----------------|-------|
| Construction <sup>(a)</sup>              | 827           | 826      | 850 | 865      | 1,798          | 5,346 |
| Rehabilitation <sup>(b)</sup>            | 0             | 10       | 10  | 10       | 0              | 30    |
| Conservation/Preservation <sup>(c)</sup> | 84            |          |     |          |                | 84    |

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) At-risk units.

## Section 3

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# 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 shaping the development of the City, shifting the City 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 more 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 improvements 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 20<sup>th</sup> century it was relatively easy for the average household to find a reasonably priced home in the City. This changed, however, 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 21<sup>st</sup> 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 considerable 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

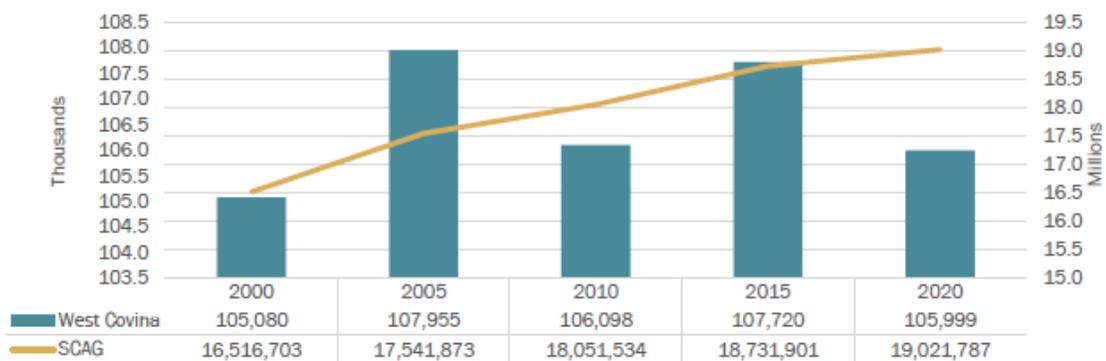
The primary data sources used for the Needs Assessment include the U.S. Census and American Community Survey (ACS), the federal Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), California Department of Finance, and the Southern California Association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



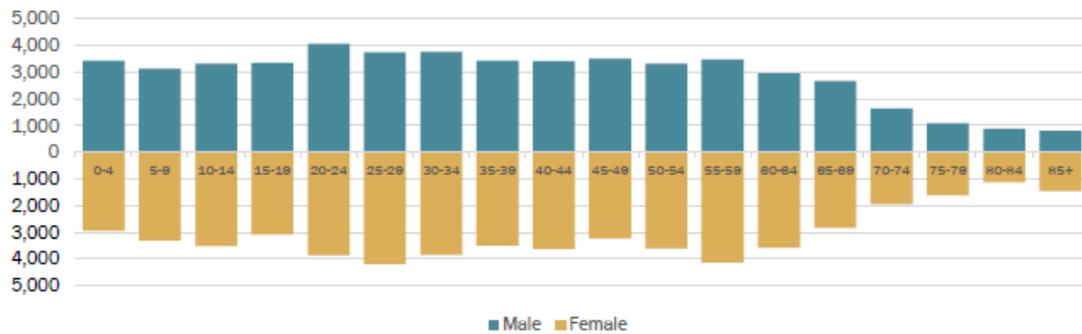
CA DOF E-5 Population and Housing Unit Estimates

### 3.3.2 Age 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 tend to generate demand for low- to moderate-cost apartments and condominiums, community residential settings, and mobile homes.

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

**Figure 3-2 Population by Age and Gender – West Covina**

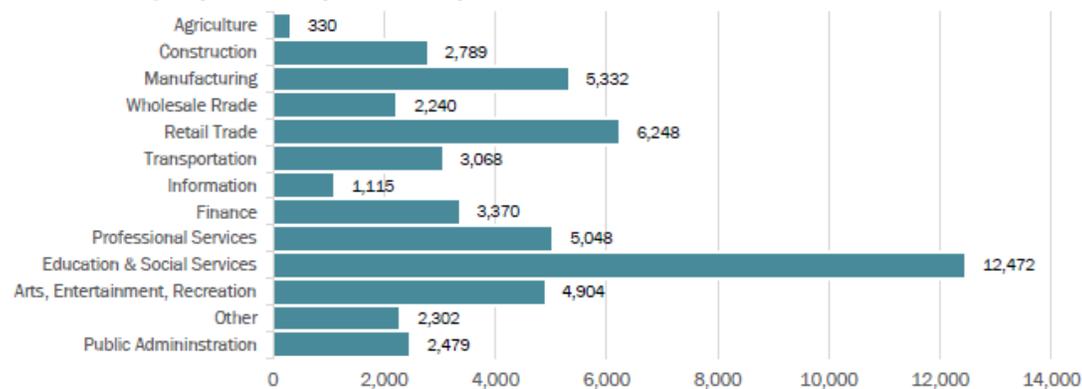


American Community Survey 2014-2018 5-year estimates

### 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 percent of the population employed in the education and social services sector (**Figure 3-3**).

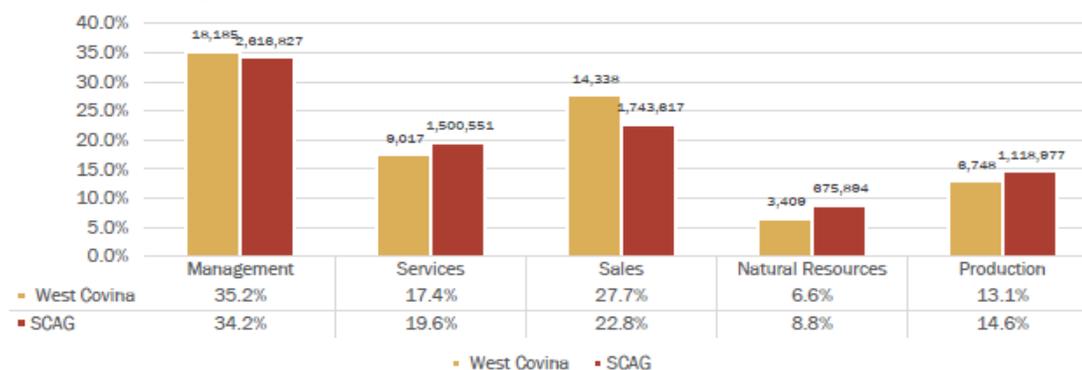
**Figure 3-3 Employment by Industry – West Covina**



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**



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

## 3.4 Household Characteristics

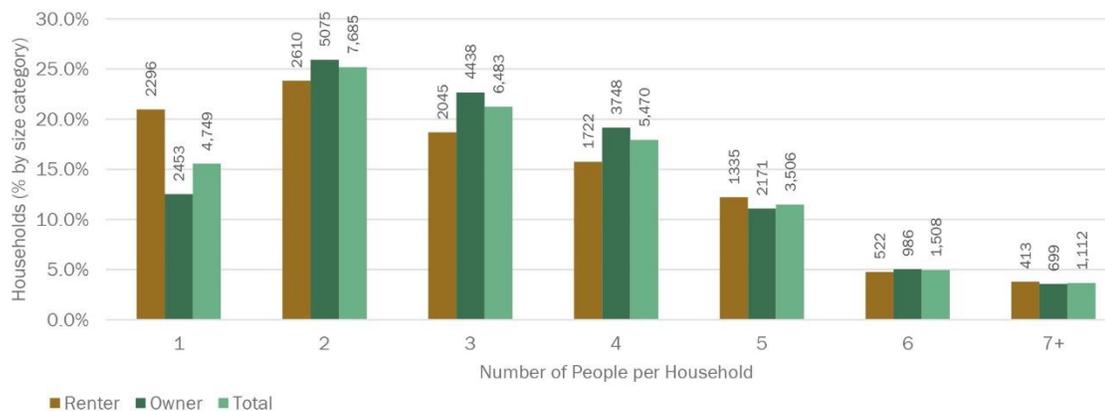
Before current housing problems can be understood and future needs anticipated, housing occupancy characteristics need to be identified in the City. The following is an analysis of household types and sizes, and other household characteristics that may affect housing needs.

### 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%) and the second-most commonly occurring household size is three people (21.2%). West Covina has a lower share of single-person households than the SCAG region overall (15.6% vs. 23.4%) and a higher share of 7+ person households than the SCAG region overall (3.6% vs. 3.1%).

**Figure 3-5 Household Size by Tenure – West Covina**



American Community Survey 2014-2018 5-year estimates.

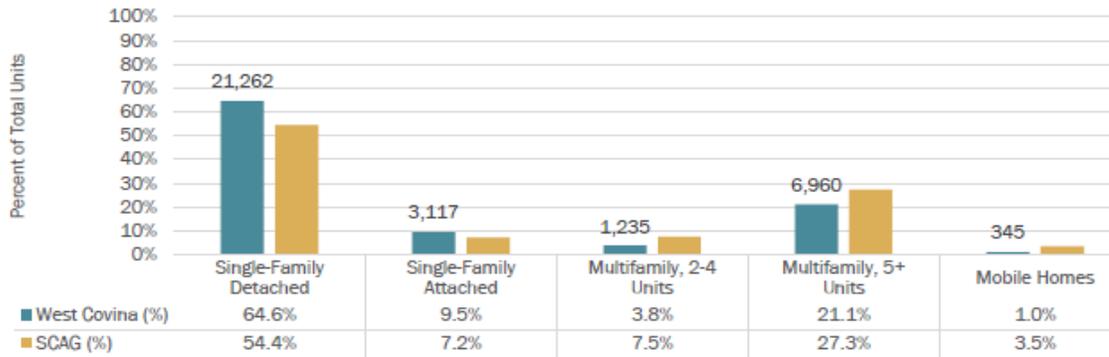
## 3.5 Housing Inventory and Market Conditions

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%, which is higher than the 61.7% share in the SCAG region as a whole. The overall vacancy rate is about 4.5% 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**

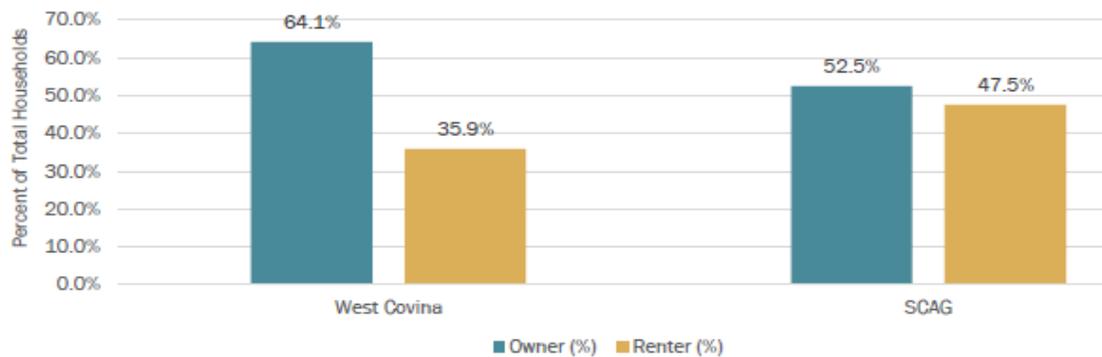


CA DOF E-5 Population and Housing Unit Estimates

### 3.5.2 Tenure

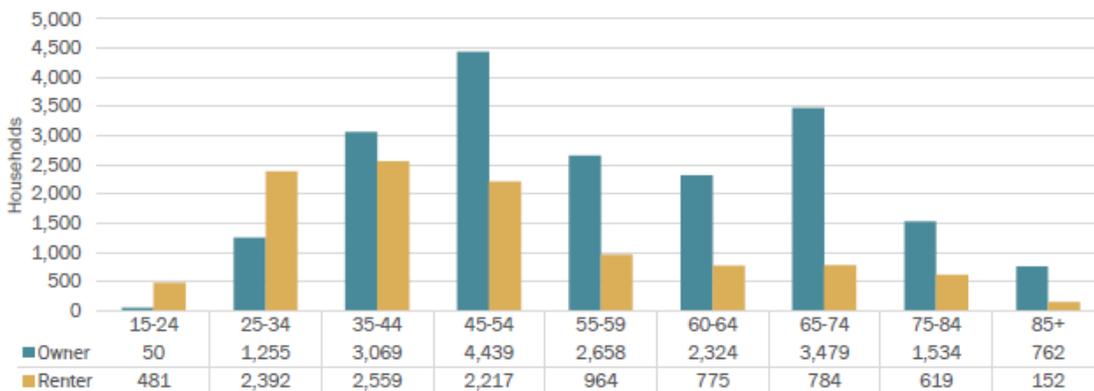
Housing tenure refers to whether a given unit is owned or rented. According to recent Census estimates, nearly two-thirds of housing units in West Covina were owner-occupied compared to only about 53% for the region as a whole (**Figure 3-7**). **Figure 3-8** shows the relationship between tenure and 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**



American Community Survey 2014-2018 5-year estimates.

**Figure 3-8 Housing Tenure by Age – West Covina**

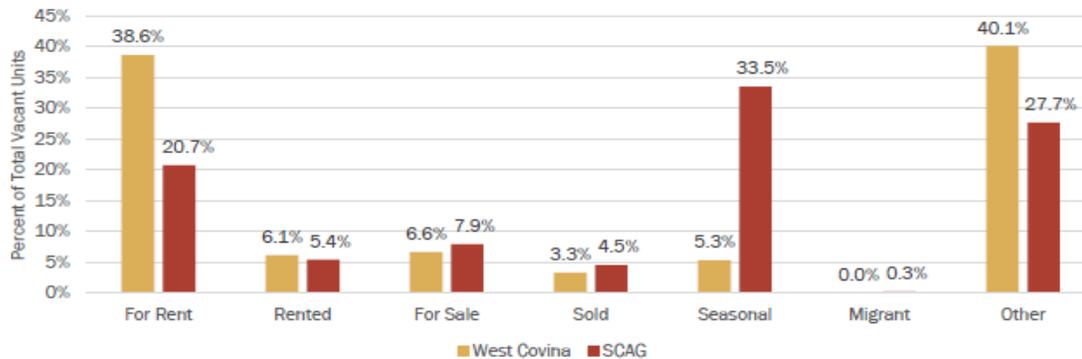


American Community Survey 2014-2018 5-year estimates.

### 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**



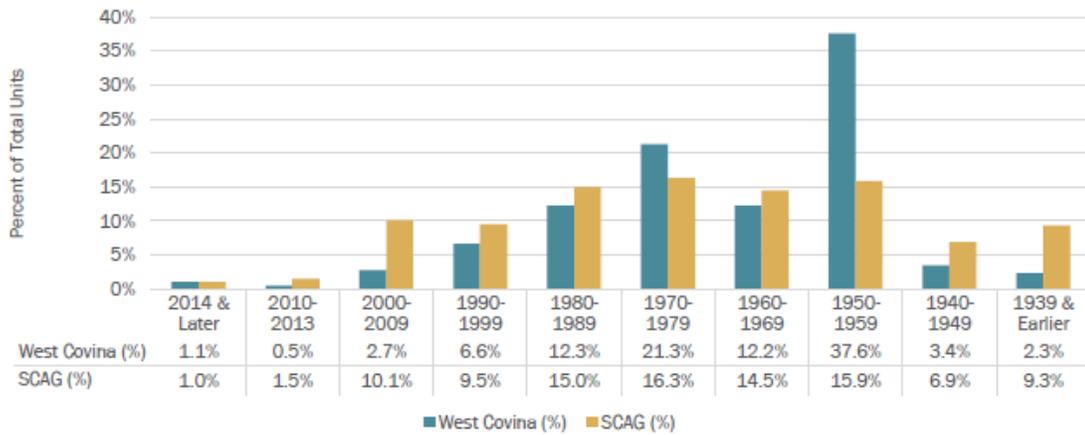
*American Community Survey 2014-2018 5-year estimates.*

### 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**



American Community Survey 2014-2018 5-year estimates.

### 3.5.5 Housing Conditions

Housing is considered to be 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 and depending on the year they were built and the quality of construction they can lack basic amenities such as a complete kitchen, and/or plumbing facilities.

Since 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 two and three 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.

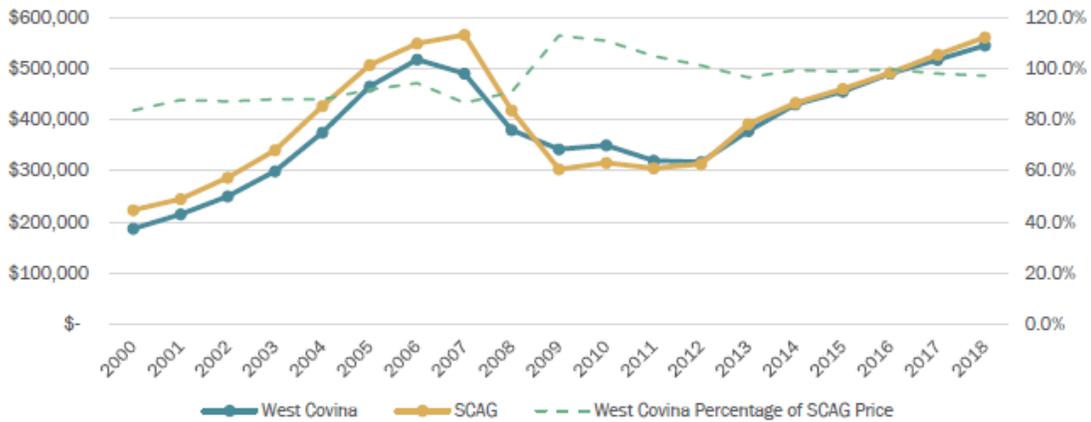
### 3.6.1 Owner-occupied Housing

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% while prices in the SCAG region as a whole increased 151%. 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% of the SCAG region median in 2000 and a high of 112.9% in 2009.

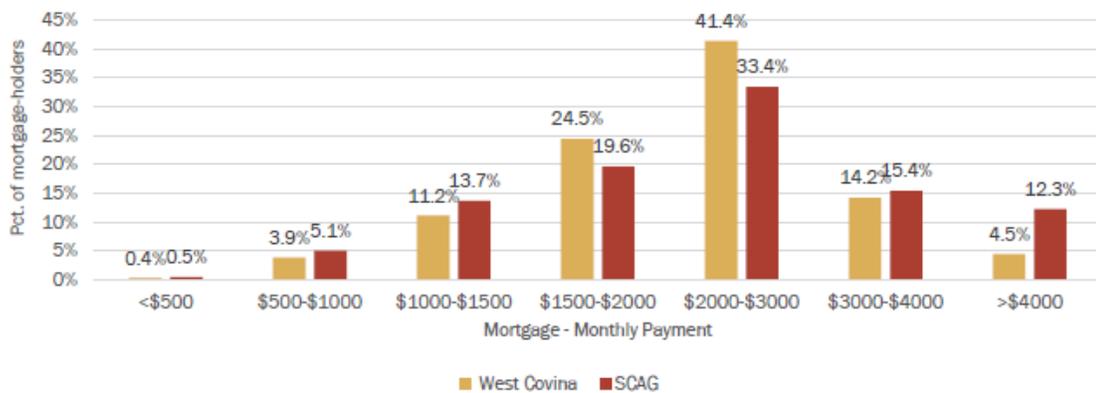
**Figure 3-11 Median Home Sales Prices for Existing Homes 2000-2018 – West Covina vs. SCAG Region**



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**



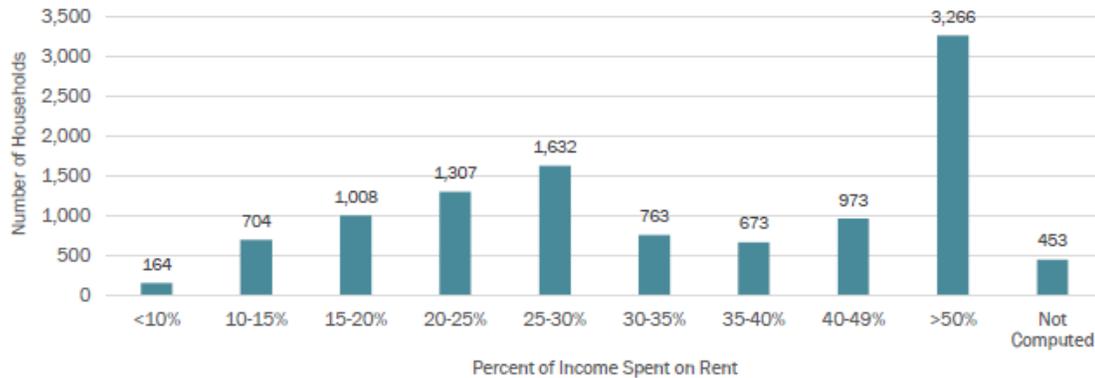
American Community Survey 2014-2018 5-year estimates.

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% 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.

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



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



American Community Survey 2014-2018 5-year estimates.

### 3.6.3 Overcrowding

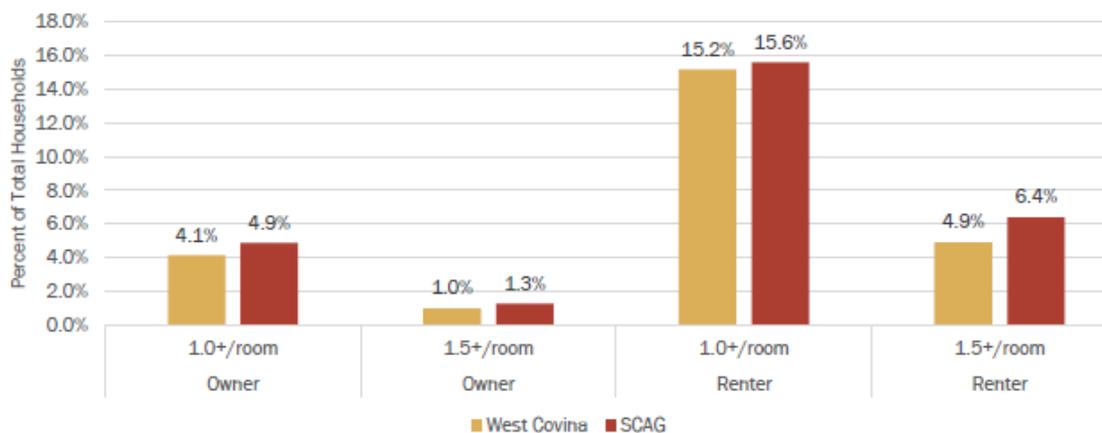
In response to higher home prices, lower-income households must often accept smaller housing units. This can result in overcrowding, which places a strain on physical facilities, does not provide a satisfying living environment, and can have an effect on local neighborhoods. The US Census defines overcrowding 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 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 Overcrowding by Tenure – West Covina vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

**Figure 3-15** summarizes the status of overcrowding in West Covina compared to the SCAG region as a whole. In West Covina, 4.1% of owner-occupied households and 15.1% of renter-occupied households had more than 1.0 occupants per room, while an additional 1.0% of owner-occupied households and 4.9% 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.

### 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 3-1** 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 3-1 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

State law 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, the homeless, and farmworkers.

#### 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 disabilities, and/or experience housing overpayment. The special housing needs of the elderly also extend to the construction and location of units. The elderly often require housing features such as ramps, handrails, lower cupboards and counters to allow access and function. Similarly, 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 also remains a serious problem for many seniors. This can be alleviated by locating units close to the amenities commonly used by the elderly.

**Table 3-2** shows that about 23.8% of elderly households in West Covina earn less than 30% of the surrounding area income, (compared to 24.2% in the SCAG region), 44.5% earn less than 50% of the surrounding area income (compared to 30.9% in the SCAG region).

**Table 3-2 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 20% of owner-occupied households and about 21% of renter-occupied households in West Covina.

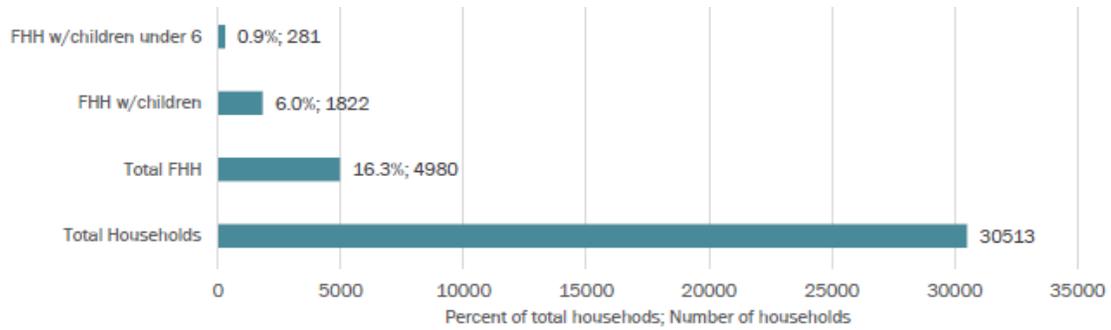
Difficulties in securing housing large enough to accommodate all members of a household is more challenging for renters, because multi-family rental units are typically smaller than single-family ownership units. While apartment complexes in the City offering three bedrooms are common, apartments with 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% of West Covina households are female-headed (compared to 14.3% in the SCAG region), 6% are female-headed and with children (compared to 6.6% in the SCAG region), and 0.9% are female-headed and with children under 6 (compared to 1.0% in the SCAG region).

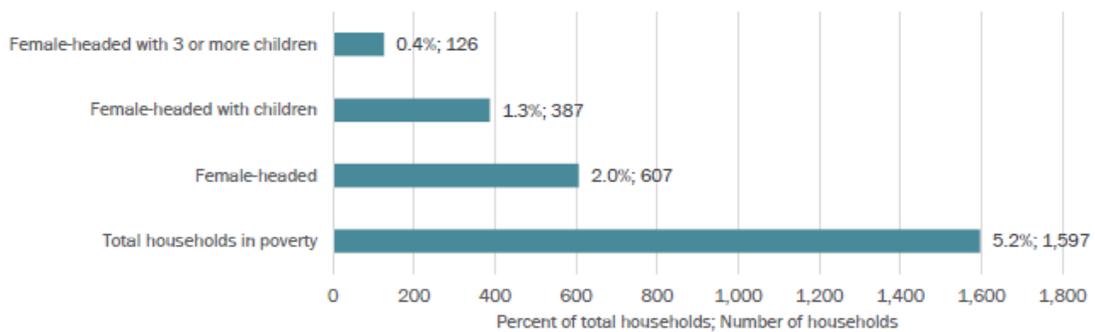
About 5.2 percent of West Covina's households are experiencing poverty, compared to 7.9 percent of households in the SCAG region. **Figure 3-17** shows estimated poverty rates for female-headed households in West Covina.

**Figure 3-16 Female-Headed Households – West Covina**



American Community Survey 2014-2018 5-year estimates.

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



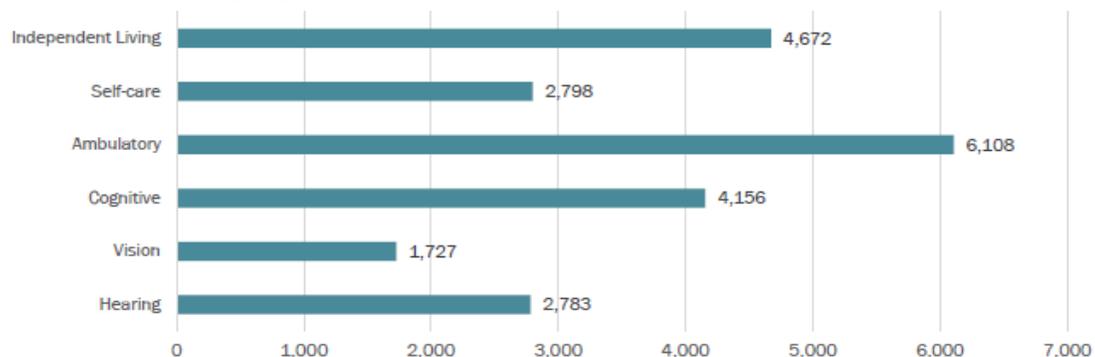
American Community Survey 2014-2018 5-year estimates.

### 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.

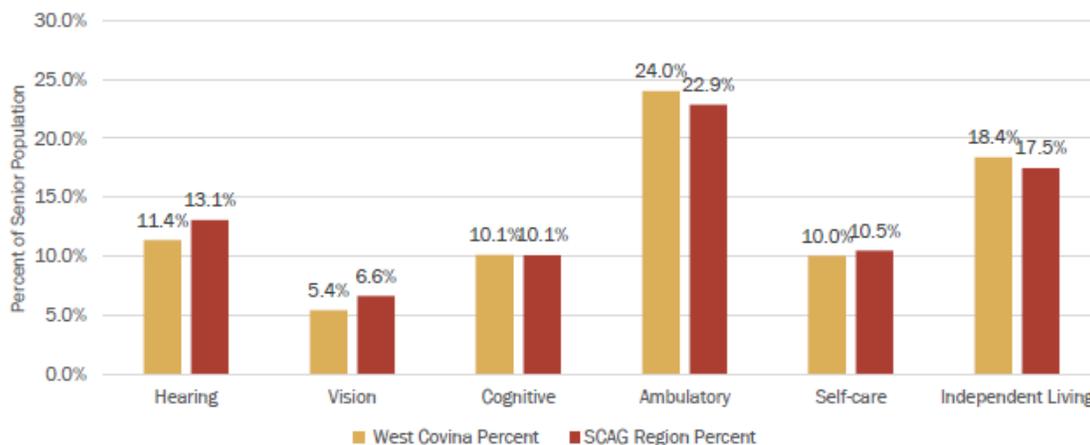
**Figure 3-18** shows recent Census estimates of the types of disabilities affecting West Covina residents while **Figure 3-19** shows disabilities among senior citizens. Approximately 39% of West Covina residents with a disability are in the labor force.

**Figure 3-18 Disability by Type – West Covina**



American Community Survey 2014-2018 5-year estimates.

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



American Community Survey 2014-2018 5-year estimates.

**Table 3-3 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.

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 retardation, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to mental retardation or to require treatment similar to that required for individuals with mental retardation, 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 3-4** shows recent data regarding persons with a developmental disability in the City of West Covina.

**Table 3-4 Developmental Disabilities – West Covina**

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

- CA DDS consumer count by CA ZIP, age group and residence type for the end of June 2019. Data available in 161/197 SCAG jurisdictions.

To address the housing needs for persons with developmental disabilities, the Housing Plan includes Program 2.3 – Alternative Housing Models and Program 3.1 – Reduce Governmental Constraints. 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

Housing the extremely-low-income population (below 30% of area median income) can be especially challenging. HUD's CHAS dataset provides information on such households in West Covina. **Table 3-5** provides a breakdown of extremely-low-income households by race and ethnicity. The race/ethnicity with the highest share of extremely-low-income households in West Covina is Black, non-Hispanic (16.9% compared to 13.7% of total population). In the SCAG region, the highest share of extremely-low-income households is Black, non-Hispanic (27.1% compared to 17.7% of total households).

**Table 3-5 Extremely-Low-Income Households – West Covina**

|                               | Total Households | Households below 30% HAMFI | Share below 30% HAMFI |
|-------------------------------|------------------|----------------------------|-----------------------|
| White, non-Hispanic           | 5,625            | 735                        | 13.1%                 |
| Black, non-Hispanic           | 1,594            | 269                        | 16.9%                 |
| Asian and other, non-Hispanic | 9,127            | 1,115                      | 12.2%                 |
| Hispanic                      | 14,275           | 2,070                      | 14.5%                 |
| Total                         | 30,621           | 4,189                      | 13.7%                 |
| Renter-occupied               | 10,905           | 2,580                      | 23.7%                 |
| Owner-occupied                | 19,735           | 1,620                      | 8.2%                  |
| Total                         | 30,640           | 4,200                      | 13.7%                 |

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

There are limited opportunities to address the housing needs of extremely-low-income households in West Covina. However, the needs of this special needs group are taken into consideration and are generally addressed through the City's overall programs for housing affordability. The City also provides a number of deed-restricted units that offer housing opportunities for ELI households.

### 3.7.7 Homelessness

Homelessness continues to be a regional as well as a national issue. Enumerating the total number of homeless is difficult due to the transient nature of the population, as well as the existence of the hidden homeless. The term *hidden homeless* refers to individuals that are not necessarily on the street and are often not counted in homeless surveys. These individuals typically reside in temporary housing situations (e.g., doubling up with another household or in 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 data available for the City of West Covina (January 2020) estimated that there were approximately 124 homeless persons individuals in the city and 5,082 homeless persons in SPA 3.

There are numerous factors that contribute to homelessness in West Covina and Los Angeles County. Difficulties in obtaining employment, insufficient education, mental illness, and substance abuse are a few of the more traditional factors. The rapid increase in housing costs during the last few years has also contributed to 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'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 4.1.6 Other Housing-Related Regulations.

### 3.7.8 Farmworkers

Like many other cities in Southern California, West Covina's economy was at one time linked to agriculture. Changes in the local economy to production and service-oriented sectors have virtually eliminated significant agricultural production within City limits. While Los Angeles County still has areas with agricultural activity, farmland in West Covina has been almost entirely converted as the City reaches buildout. Consequently, many of the remaining agricultural uses are specialty nurseries or stables, which do not employ migrant farmworkers. 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 3-6**). City regulations regarding farmworker housing are discussed in Chapter 4.

**Table 3-6 Agricultural Employment – West Covina**

*Farmworkers by Occupation:*

| West Covina | Percent of total West Covina workers: | SCAG Total |  |
|-------------|---------------------------------------|------------|--|
| 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:*

| West Covina | Percent of total West Covina workers: | SCAG Total |  |
|-------------|---------------------------------------|------------|--|
| 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 |

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 2031 period are considered to be “at-risk.” Reasons for this conversion may include expiration of subsidies, mortgage pre-payments or pay-offs, and concurrent expiration of affordability restrictions. **Table 3-7** shows assisted low-income rental units in West Covina. None of these projects is at-risk of conversion to market rate during 2021-2031.

**Table 3-7 Affordable Housing At-Risk of Conversion to Market Rate**

| <b>Project</b>                                       | <b>Total Affordable Units</b> | <b>Expiration Date</b> | <b>At Risk?</b> |
|--|-------------------------------|------------------------|-----------------|
| Mountain Shadows Apts.<br>2775 E. Valley Blvd.       | 84                            | 2022                   | Yes             |
| Brookhollow Apartments<br>2600 S. Azusa Ave.         | 85                            | 2053                   | No              |
| Lark Ellen Village<br>1350 E San Bernardino Rd.      | 121                           | 2037                   | No              |
| The Promenade<br>1333 W Garvey Ave N.                | 123                           | 2070                   | No              |
| Heritage Park<br>1800 W. Badillo St.                 | 14                            | No Expiration          | No              |
| Vintage Gardens<br>1950 Badillo St.                  | 186                           | 2054                   | No              |
| West Covina Senior Villas<br>1842 E. Workman Ave.    | 17                            | 2035                   | No              |
| West Covina Senior Villas II<br>1838 E. Workman Ave. | 64                            | 2102                   | No              |
| Cameron Park<br>929 W. Cameron Ave.                  | 156                           | 2073                   | No              |
| Olive Tree Terrace<br>721 N. Azusa Ave.              | 82                            | 2040                   | No              |
| <b>TOTAL</b>   | <b>687</b>                    |                        |                 |

Source: California Housing Partnership Corporation; City of West Covina, 2021.

### **At-Risk Status**

One development – Mountain Shadows – with 84 lower-income units is at risk of converting to market rate during the 2021 to 2031 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 84 at-risk units is approximately \$20-\$25 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 \$33 to \$60 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% 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 84 at-risk units is estimated to be approximately \$4 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 84 new low-income units is estimated to be approximately \$33.6 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 purposes. 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 "6<sup>th</sup> 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 3-8**. 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 3-8 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%         |
| <b>Total</b>   | <b>5,346</b> | <b>100%</b> |

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 AML.

## 3.10 Fair Housing Assessment

Under State law, "affirmatively furthering fair housing" means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

There are three parts to this requirement:

1. Include a Program that Affirmatively Furthers Fair Housing and Promotes Housing Opportunities throughout the Community for Protected Classes (applies to housing elements beginning January 1, 2019).
2. Conduct an Assessment of Fair Housing that includes summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify, and an assessment of the contributing factors for the fair housing issues.
3. Prepare the Housing Element Land Inventory and Identification of Sites through the Lens of Affirmatively Furthering Fair Housing.

In compliance with AB 686, the City has completed the following outreach and analysis.

### 3.10.1 Outreach

As discussed in Appendix C, the City held a series of public meetings during the Housing Element update in an effort to include all segments of the community. Each meeting was publicized on the City's website and meeting notices were also sent to persons and organizations with expertise in affordable housing and supportive services. Interested parties had the opportunity to interact with City staff throughout the Housing Element update process and provide direct feedback regarding fair housing issues.

The City also created a dedicated web page for the Housing Element update (<https://www.westcovina.org/departments/community-development/planning-division/general-plan/housing-element-update>) and provided opportunities for interested persons to participate in public meetings remotely, which made it possible for those with disabilities limiting their travel to participate in the Housing Element update process regardless of their ability to physically attend the meetings.

### 3.10.2 Assessment of Fair Housing

The following analysis examines geographic data regarding racial segregation, poverty, persons with disabilities, and areas of opportunity as identified by the TCAC/HCD Opportunity Areas map.

Racial segregation. As seen in **Figure 3-20**, the percentage of non-white population in the city is similar to the adjacent areas. This map does not indicate any patterns of substantial racial/ethnic concentration in the city.

Poverty. Recent Census estimates regarding poverty status of households in West Covina are shown in **Figure 3-21**. As seen in this map, the poverty rate in the city ranges from less than 10% in some areas of the city and between 10% and 20% in other areas, which is similar to the surrounding cities.

Persons with disabilities. The incidence of disabilities in West Covina is similar to the surrounding areas. As shown in **Figure 3-22**, the percentage of residents reporting a disability ranges from less than 10% in some areas of the city and between 10% and 20% in other areas. This map does not indicate a substantial concentration of persons with disabilities.

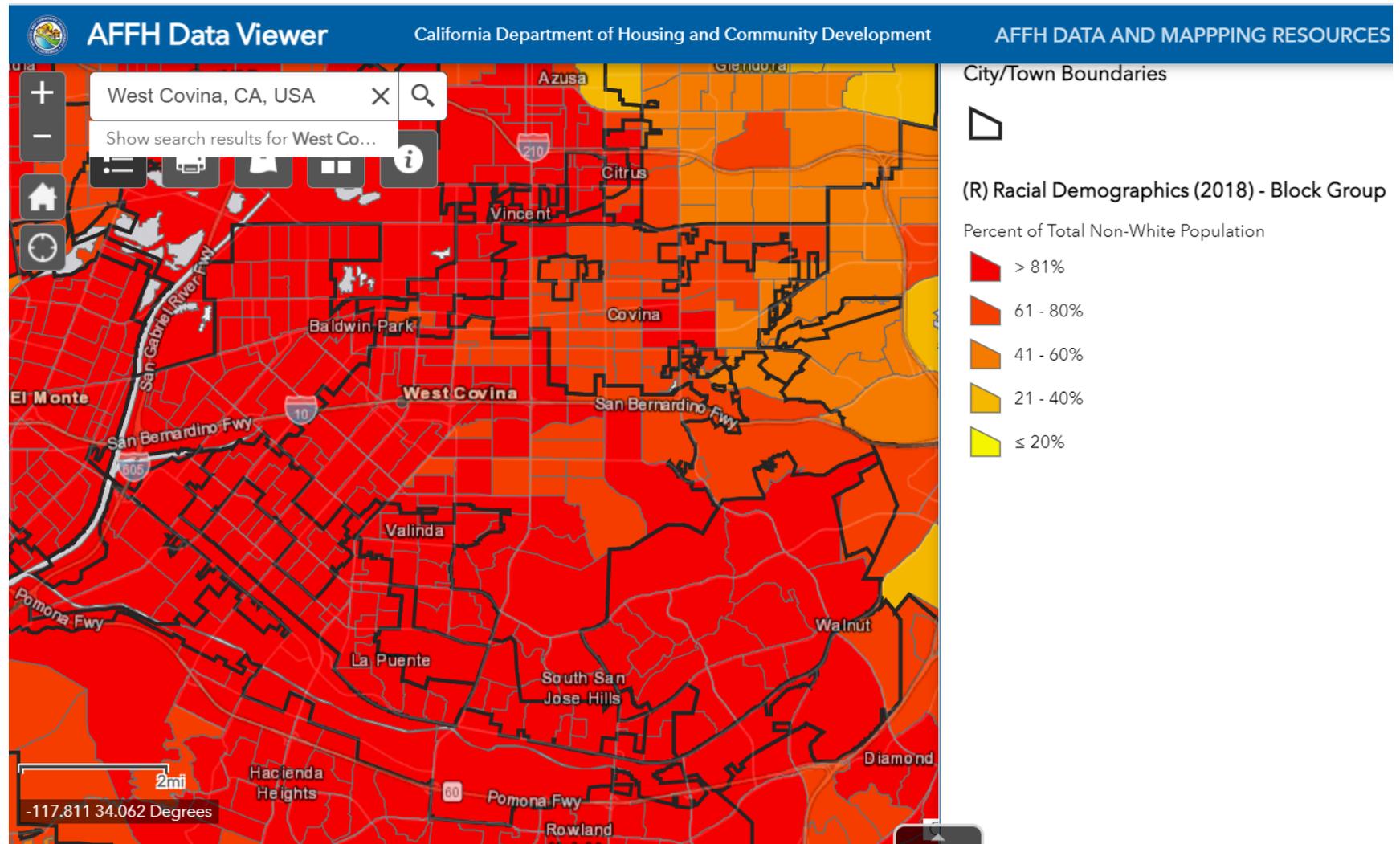
Access to opportunity. According to the 2020 California Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) Opportunity Area Map (**Figure 3-23**), West Covina is within the “Moderate Resource” and “High Resource” designations. These designations are determined by index scores for a variety of educational, environmental, and economic indicators, such as employment and proximity to jobs, access to effective educational opportunities for children and adults, concentration of poverty, and levels of environmental pollutants, among others.

## Conclusion

This analysis shows that West Covina does not appear to indicate patterns of racial segregation or concentrations of poverty or persons with disabilities, and is characterized by TCAC as having moderate to high opportunity.

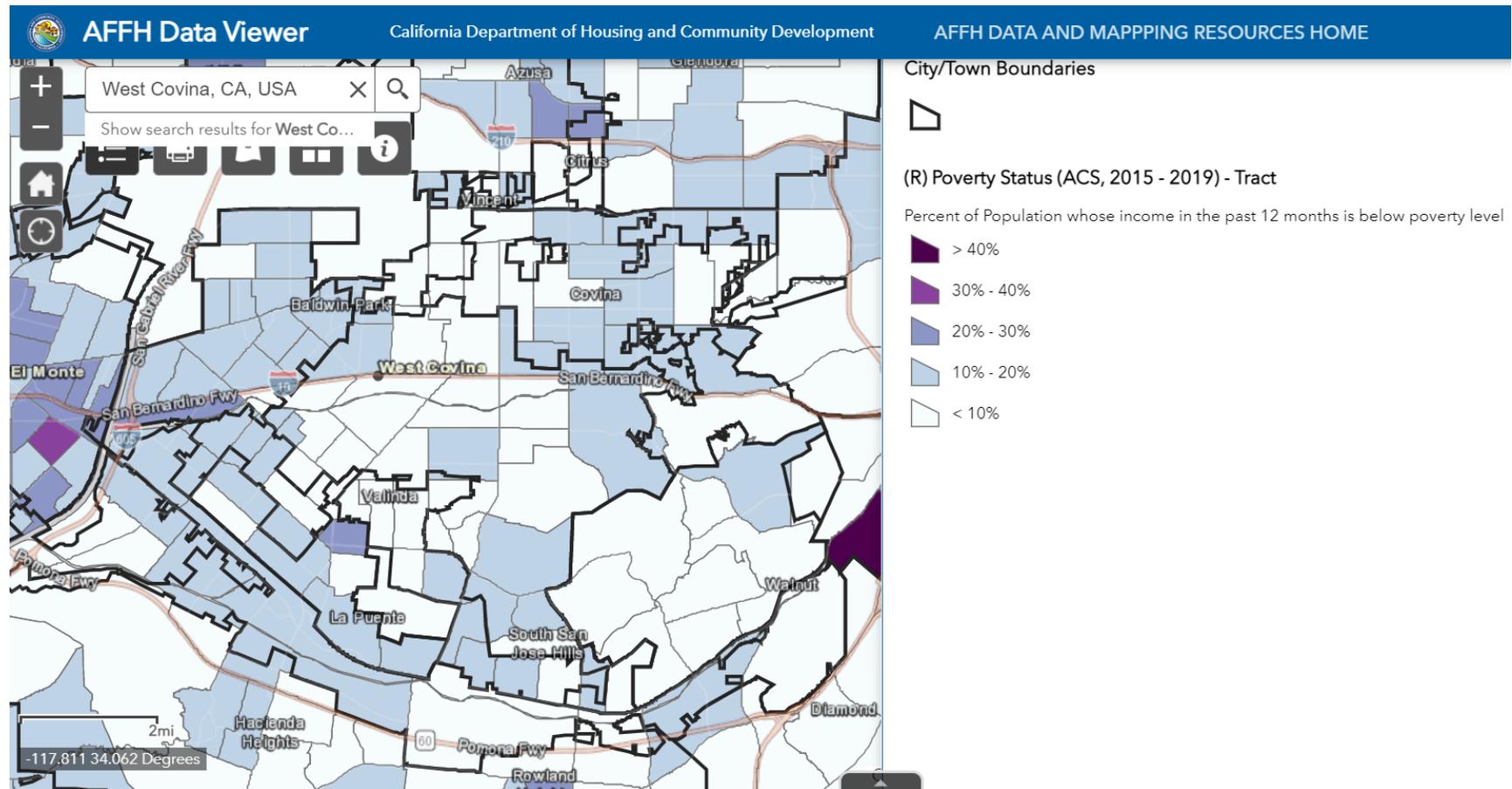
The Housing Plan includes several programs to encourage and facilitate affordable housing development, as well as the provision of accessory dwelling units, which can expand affordable housing opportunities for lower-income persons such as caregivers, household employees, and others working in service occupations. Program 4.1 describes actions the City will take to affirmatively further fair housing while many other programs facilitate expanded housing opportunities for lower-income households and persons with special needs.

Figure 3-20 Racial Characteristics – West Covina



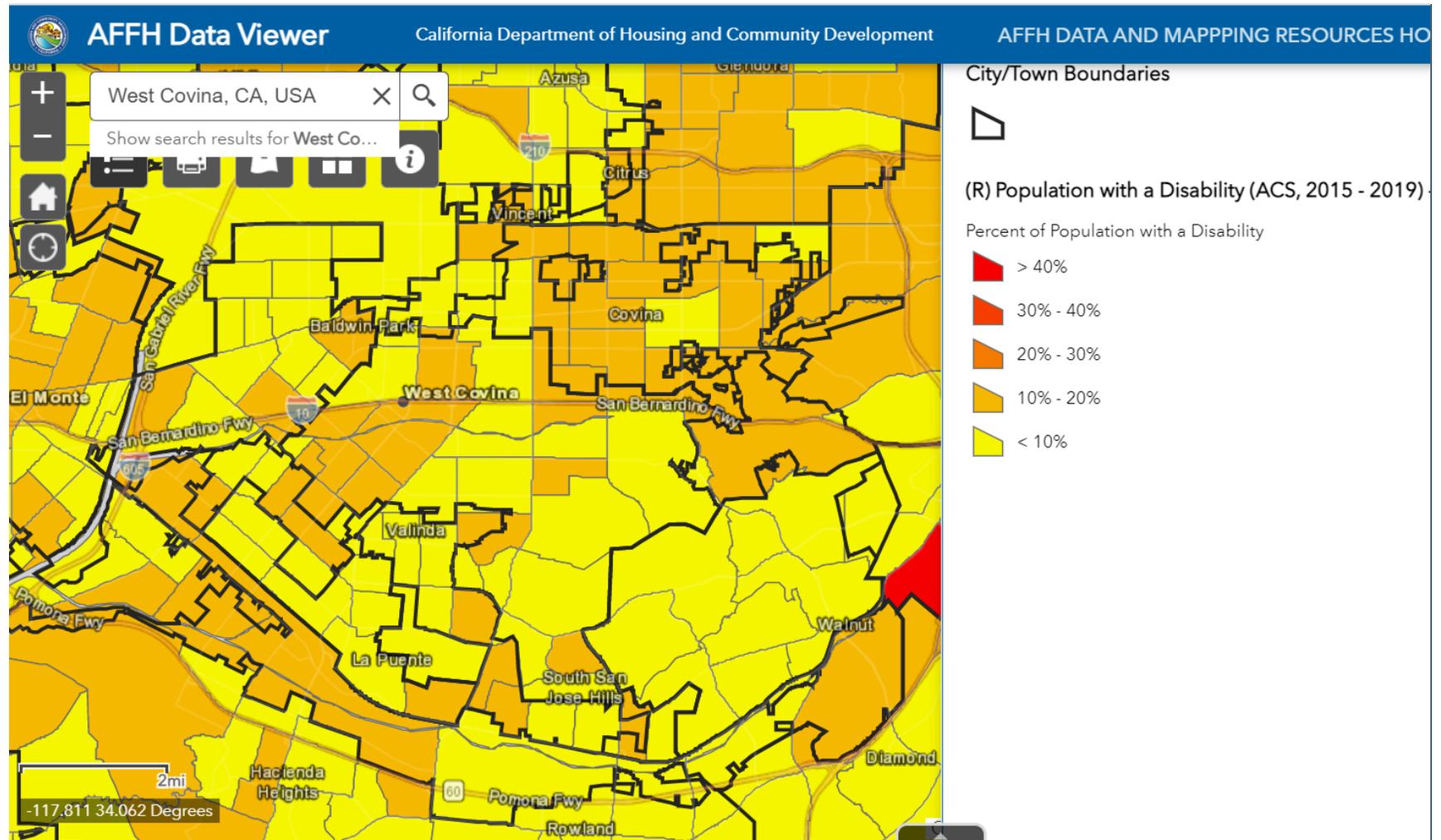
Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021  
 Note: For purposes of this analysis, the Hispanic category is included within the Total Non-White Population

Figure 3-21 Poverty Status – West Covina



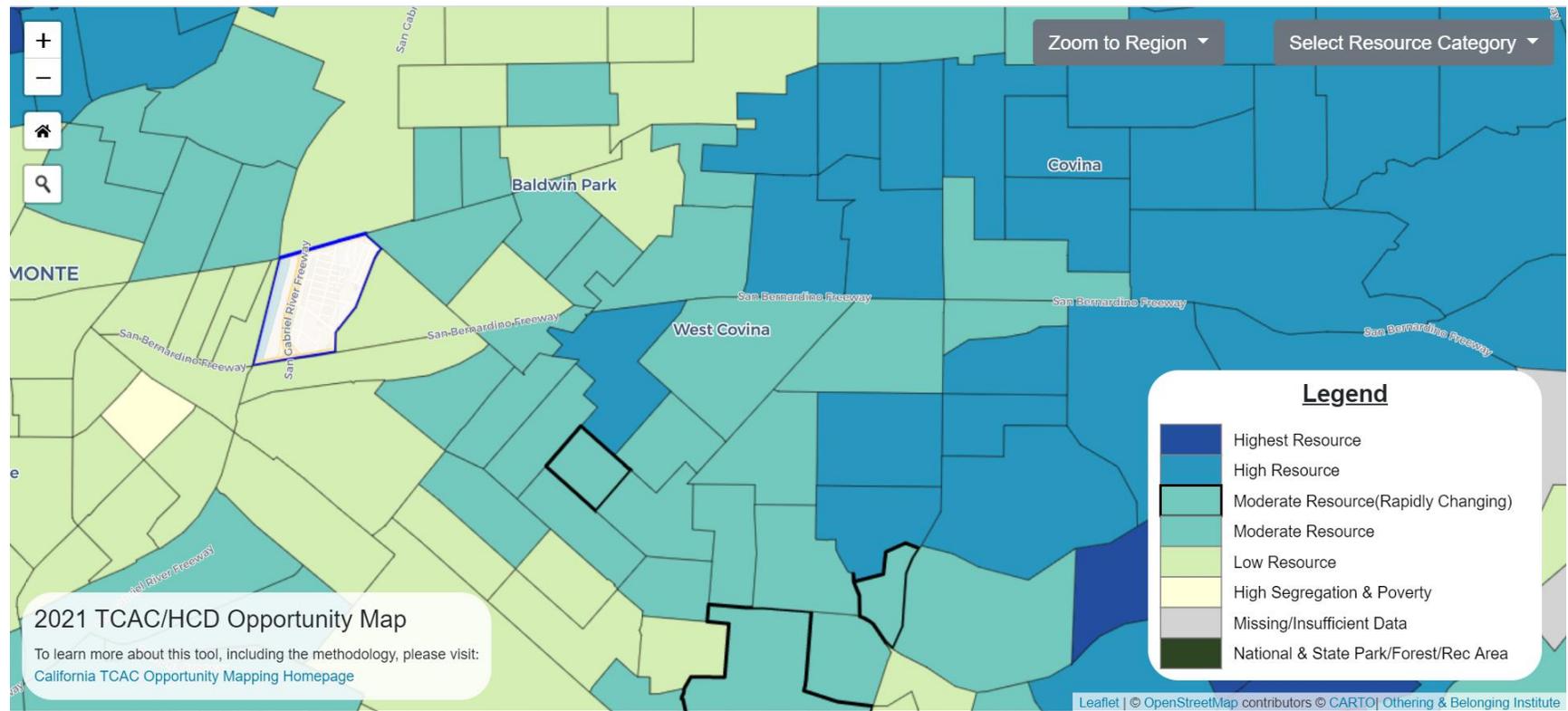
Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021

Figure 3-22 Population with a Disability – West Covina



Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021

**Figure 3-23 TCAC/HCD Opportunity Map – Covina**



## Section 4

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# Housing Constraints

Pursuant to State law, 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 analysis must include housing for all segments of the population including all income levels and persons with special needs (such as the homeless, disabled, and elderly). This analysis of potential housing constraints considers the following:

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

### 4.1 Governmental Constraints

Local policies and regulations can affect the availability of housing and in particular, the provision of affordable housing. Land use controls, site improvement requirements, fees and exactions, permit processing procedures, and other factors can affect the maintenance, development, and improvement of housing. State, federal and regional regulations, which the City has no control over, also affect the availability of land for housing and the cost of producing housing. Regulations related to environmental protection, building codes, and other topics have significant, often adverse impacts on housing cost and availability. While constraints exist at other levels of government, this section focuses on policies and regulations that are under the control of the City.

It is important to note that the City of West Covina's intent is to find a balance between implementing community standards and quality for new residential development, and maintaining a development review process and appropriate regulations that do not unreasonably constrain new residential construction. The City has been successful in achieving that balance as evidenced by the construction of approximately 860 new residential units during the 2000-2020 period despite being "built-out" and experiencing the negative economic effects on the housing market during the Great Recession.

### 4.1.1 Land Use Controls

Land use controls are policies, regulations, plans, and other methods of regulating the possible uses and development of property, including such things as zoning, subdivision regulations, and floodplain regulation. 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. State law requires seven elements or chapters in the General Plan, including the Housing Element. Each of the elements provides policy guidance for the built environment; however, the Land Use Element has a direct relationship with allowable uses of property and development standards. The Land Use Element 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 also includes a map with land use designations that describe the distribution, density, and location of land uses in the City. Consequently, there is a significant relationship between the Land Use Element and housing development in a City.

In 2016, the City adopted a comprehensive update to the General Plan (also known as *Plan WC*). Plan WC implements the Transect system, which is system of natural-to-urban transect zones or “human habitats.” For each transect zone there is an equivalent land use designation.

Through implementation of the General Plan, the City utilizes a number of planning tools including specific plans, zoning regulations, and a subdivision ordinance. With these documents, the City establishes more specific development standards, allowable uses, and limitations. The West Covina General Plan provides for seven planning designations with corresponding transect zones. General Plan residential land use designations express densities as dwelling units per acre (du/ac). **Table 4-1** describes the General Plan land use designations that permit residential uses.

**Table 4-1 General Plan Designations and Corresponding Transect Zones**

| Designation         | Transect  | Description   |
|---------------------|---|---|
| Neighborhood Low    | T3 Sub-Urban and T4 General Urban   | Emphasizes detached houses with some attached units in a small mix of building types from 0 up to 8 dwelling units per acre. Predominantly residential, with opportunity for limited home occupation and neighborhood services sensitively located along corridors and at intersections.  |
| Neighborhood Medium | T3 Sub-Urban, T4 General Urban, and T5 Urban Center                           | Anticipates a mixture of detached and attached dwellings and higher building types at approximately 9 to 20 dwelling units per acre. Predominantly residential with small scale commercial at key locations, primarily at intersections and adjacent to corridors.  |
| Neighborhood High   | T3 Sub-Urban through T6 Urban Core  | Accommodates a broader mix of building types, primarily attached, from 21 to 54 dwelling units per acre; A mix of residential, commercial, office, and entertainment that includes mixed-use buildings.   |
| Commerce            | T4 General Urban through T6 regional center, urban core, neighborhood center) | 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. Intended housing densities are 21 to 54 units per acre in the Downtown Plan area and 9 to 20 units per acre outside the Downtown. |

| Designation          | Transect                          | Description  |
|----------------------|-----------------------------------|--|
| Industry             | T4 to T6 Urban Core               | Encourages intensive manufacturing, processing, warehousing and similar uses, as well as light, clean industries and support offices; also encourages workplace-serving retail functions and work-live residences where such secondary functions would complement and be compatible with industrial uses. Primarily large-scale buildings. |
| Civic                | T1 Preserve through T6 Urban Core | Accommodates civic functions such as government offices, libraries, schools, community center, and places of religious worship.  |
| Parks and Open Space | T1 Preserve through T6 Urban Core | Designate lands to public recreation and leisure and visual resources, and can range from neighborhood tot lots and pocket parks to urban squares and plazas and playgrounds to large regional parks and natural preserves.  |

- Source: General Plan, Land Use Element, 2016.

## Zoning Code

State law (Government Code §65454) requires that a City's General Plan and zoning regulations be consistent. This is critical as zoning regulations serve as a key General Plan implementation tool. The West Covina Zoning Ordinance accommodates a diversity of residential housing types. The Code allows for innovation in design, provided that the development does not exceed the overall density and dwelling unit capacity shown in **Table 4-2**. The West Covina Zoning Code presently provides for seven residential land use categories. Each of the categories is listed below:

- Agricultural Residential (R-A)
- Single Family Residential (R-1)
- Low Density Multi-Family, Condominium Zone (MF-8)
- Low-Medium Density Residential (MF-15)
- Medium Density Residential (MF-20)
- High Density Residential (MF-45)
- Planned Community Development (PCD)

The densities of the zones range from one unit per acre to 54 units per acre. Zoning regulations establish standards for density, lot area, floor area ratio, lot coverage, yard setbacks, structure height, minimum open space and minimum parking spaces.

Development and design standards may increase the costs of housing and hinder the creation of affordable housing for low-income and senior residents. To minimize constraints and maintain incentives for affordable housing developers, the City encourages the use of density bonuses consistent with State law.

**Table 4-2, Table 4-3** and **Table 4-4** display the City's zoning requirements for single-family and multi-family residential zones, while also presenting any standards specific to the City's area districts. The City is currently updating the Zoning Ordinance to revise allowable uses and development standards consistent with the General Plan update adopted in 2016.

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

| Area District                                | I   | IA  | II  | IIA   | III   | IV  |
|--|---|---|---|---|---|---|
| Maximum Density Allowed (per acre)           | 5.8   | 7.25  | 4.6   | 4.6   | 3   | 2.2   |
| Minimum Lot Width (ft.)                      | 60  | 50  | 70  | 74  | 90  | 110   |
| Minimum Lot Depth (ft.)                      | 105   | 95  | 110   | 110   | 125   | --  |
| Minimum Lot Area (sq. ft.)                   | 7,500   | 6,000   | 9,450   | 9,450   | 14,400  | 20,000  |
| Minimum Dwelling Area (sq. ft.)              | 950   | 900   | 1,100   | 1,200   | 1,500   | 1,600   |
| Maximum size of units in developmental areas | .35 FAR or 3,999 SF, whichever is less  | 0.50 FAR for first 5,000 SF<br>0.35 FAR for remaining lot area over 5,000 SF        | 4,000   | 5,000   | 6,000   | 7,000   |
| Parking                                      | 2 covered and 2 uncovered   |
| Single-Family Building Height                | 2 stories, no more than 25 ft. above finished grade                                 | 2 stories, no more than 25 ft. above finished grade                                 | 2 stories, no more than 25 ft. above finished grade                                 | 2 stories, no more than 25 ft. above finished grade                                 | 2 stories, no more than 25 ft. above finished grade                                 | 2 stories, no more than 25 ft. above finished grade                                 |
| Front Yard                                   | No less than 25 ft. from property line  | No less than 20 ft. from property line  | No less than 25 ft. from property line  | No less than 25 ft. from property line  | No less than 25 ft. from property line  | No less than 25 ft. from property line  |
| Side Yard                                    | Minimum 5 ft.   | Minimum 5 ft.   | Minimum 5 ft.   | Minimum 5 ft.   | Minimum 7 ft.   | Minimum 10 ft.  |
| Coverage of required yards (Yard Coverage)   | 60% of required rear yard to remain open; 40% may be covered by a 1 story structure | 60% of required rear yard to remain open; 40% may be covered by a 1 story structure | 60% of required rear yard to remain open; 40% may be covered by a 1 story structure | 60% of required rear yard to remain open; 40% may be covered by a 1 story structure | 60% of required rear yard to remain open; 40% may be covered by a 1 story structure | 60% of required rear yard to remain open; 40% may be covered by a 1 story structure |
| Lot Coverage                                 | Not to exceed 35% of the total lot or parcel area                                   | Not to exceed 35% of the total lot or parcel area                                   | Not to exceed 35% of the total lot or parcel area                                   | Not to exceed 35% of the total lot or parcel area                                   | Not to exceed 35% of the total lot or parcel area                                   | Not to exceed 35% of the total lot or parcel area                                   |

Source: City of West Covina, 2021.

**Table 4-3 Development Standards for Multiple Family Residential Zones**

| Development Standards   | MF-8   | MF-15  | MF-20  | MF-45  |
|---|--|--|--|--|
| Maximum Density Allowed (units per acre)                      | 8  | 15   | 20   | 45   |
| Minimum Site Size   | 2 acres  | 1 acre   | 1 acre   | 20,000 sq. ft.   |
| Minimum Width (feet)  | 150 ft.  | 150 ft.  | 150 ft.  | 100 ft. (At the street line)   |
| Minimum Average Depth   | --   | --   | --   | 150 ft.  |
| Area District I   | 8 units per acre                                     | 15 units per acre  | 20 units per acre  | 45 units per acre  |
| Area District II & IIA  | 7 units per acre                                     |  |  |  |
| Area District III   | 6 units per acre                                     |  |  |  |
| Area District IV  | 5 units per acre                                     |  |  |  |
| Area District V   | 4 units per acre                                     |  |  |  |
| Parking Requirements  | Condo: 2 enclosed per unit, plus 1 guest per 4 units | Condo: 2 enclosed per unit, plus 1 guest per 4 units<br>Non-Condo: 2 (1 covered) plus 10% addition for guest parking | Condo: 2 enclosed per unit, plus 1 guest per 4 units<br>Non-Condo: 2 (1 covered) plus 10% addition for guest parking | Condo: 2 enclosed per unit, plus 1 guest per 4 units<br>Non-Condo: 2 (1 covered) plus 10% addition for guest parking |
| Building setbacks from property lines                         | Minimum: 15 ft.<br>Average: 20 ft.                   | Minimum: 15 ft.<br>Average: 20 ft.   | Minimum: 15 ft.<br>Average: 20 ft.   | Minimum: 15 ft.<br>Average: --   |
| Side setbacks from property line                              |  |  |  |  |
| Interior:   |  |  |  |  |
| 1 <sup>st</sup> Story   | 10 ft.   | 10 ft.   | 10 ft.   | 10 ft.   |
| 2 <sup>nd</sup> Story   |  |  | 5 ft.  | 5 ft.  |
| 3 <sup>rd</sup> Story or higher                               |  |  | 10 ft.   | 10 ft.*  |
| Interior Abutting R-A/R-1:                                    |  |  |  |  |
| 1 <sup>st</sup> Story   | 10 ft.   | 10 ft.   | 10 ft.   | 10 ft.   |
| 2 <sup>nd</sup> Story   | 20 ft.   | 20 ft.   | 20 ft.   | 20 ft.   |
| 3 <sup>rd</sup> Story or higher                               |  |  |  | 15 ft.   |
| Adjacent to Street (Min/Average)                              | 15ft. / 20 ft.                                       | 15ft. / 20 ft.   | 15ft. / 20 ft.   | Minimum is 15 ft.  |
| Rear setbacks from the property line                          | Minimum: 20 ft.<br>Abutting R-A or R-1: 20 ft.       | Minimum: 20 ft.<br>Abutting R-A or R-1: 20 ft.<br>1 story-20 ft.<br>2 story-20 ft.                                   | Minimum: 20 ft.<br>Abutting R-A or R-1: 20 ft.<br>1 story-20 ft.<br>2 story-20 ft.<br>3 story-30 ft.                 | Minimum: 15 ft.<br>Abutting R-A or R-1: 15 ft.   |
| Recreational-leisure space                                    | 200 sq. ft. per unit                                 | 200 sq. ft. per unit   | 200 sq. ft. per unit   | 200 sq. ft. per unit   |
| Maximum building height within 100 ft. of single-family zones | 25 ft.   | 25 ft.   | 35 ft.   | 40 ft.   |

Source: City of West Covina, 2021.

\*An additional 5 feet setback is required for each additional story

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

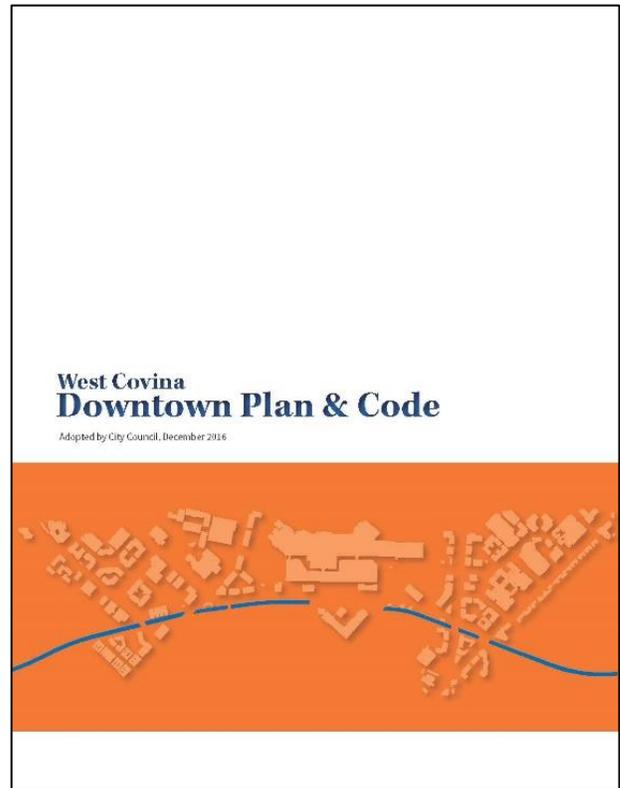
| Minimum Floor Area | Studio Units | Single Units | Number of Bedrooms |       |       |       |      |
|--------------------|--------------|--------------|--------------------|-------|-------|-------|------|
|                    |              |              | 1                  | 2     | 3     | 4     | More |
| Area District I    | --           | --           | 800                | 1,000 | 1,200 | 1,350 | +150 |
| Area District II   | --           | --           | 950                | 1,150 | 1,350 | 1,500 | +150 |
| Area District IIA  | --           | --           | 1,050              | 1,250 | 1,450 | 1,600 | +150 |
| Area District III  | --           | --           | 1,350              | 1,550 | 1,750 | 1,900 | +200 |
| Area District IV&V | --           | --           | 1,450              | 1,650 | 1,850 | 2,000 | +200 |
| MF-15              | 600          | 600          | 800                | 1,000 | 1,200 | 1,350 | +150 |
| MF-20              | 600          | 600          | 725                | 900   | 1,100 | 1,250 | +150 |
| MF-45              | 500          | 500          | 600                | 800   | 990   | 1,125 | +125 |

Source: City of West Covina, 2013

The minimum multi-family floor area standards shown in **Table 4-4** may be modified through the City's density bonus regulations (Municipal Code §26-676, et seq.) discussed later in this chapter.

### Downtown Plan and Code

A primary focus of the 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*, 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 4-5** 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.



**Table 4-5 Downtown Plan Development Standards**

| Transect Zone                     | T-5<br>Urban Center                                 | T-4<br>General Urban                                | T-4<br>Urban Neighborhood   |
|-----------------------------------|---|---|---|
| Allowed Building Types            | Flex building<br>Hybrid court<br>Liner<br>Live-work | Flex building<br>Hybrid court<br>Liner<br>Live-work | Court<br>Live-work<br>Row-house<br>Rosewalk court<br>Bungalow court<br>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          |   |   |

## 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 4-2** and **Table 4-3** above, the City of West Covina has established the following minimum parking requirements:

1. Single-family residences: 2 covered spaces and 2 non-enclosed spaces. Single-family homes that are greater than 4,500 square feet or with 5 or more bedrooms, 3 covered parking spaces and 2 non-enclosed spaces.
2. Multi-family condominiums: two enclosed spaces plus 1 guest space per 4 every four units

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. The City also calls for two enclosed resident spaces per dwelling unit regardless of the number of bedrooms.

While the City of West Covina'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 for seniors only, and the unit mix (studios, one-bedrooms, two-bedrooms, etc.). To better facilitate the development of affordable housing the City has established reduced parking standards for senior projects and projects with affordability components when located in close 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.

The City is committed to working with developers to modify parking requirements as necessary to encourage and facilitate the development of affordable housing. The City's parking requirements are not considered to be a constraint to 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. Regulations that apply to open space in single-family zones are identified in **Table 4-2**, Development Standards for Single Family Residential and Agricultural Residential by Area District. In multi-family zones, open space is regulated by setbacks and the provision of leisure space. For each dwelling unit, 200 square feet of leisure space must be provided. The recreational/leisure space must have a minimum dimension of 50 feet if the project is one- or two-story and a minimum dimension of 75 feet if the project is three-story. Required side and rear yards may be included in the recreational/leisure calculation. Communal facilities such as swimming pools or community rooms may also be included in the area. The specific regulations are provided in **Table 4-3**, Development Standards for Multiple Family Residential Zones.

Open space requirements could constrain the development of housing as land is already at a premium in West Covina, and the city is largely built out. 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. The City is committed to working with developers to modify this requirement as necessary to encourage and facilitate the development of affordable housing. In recent years, several affordable housing projects, including a senior residential facility of 65 units on a 1.05-acre parcel, have been developed and these requirements were not considered to be a constraint to development. The City's open space requirements are not considered to be a constraint to the development of housing.

## **Minimum Floor Area Requirements**

In addition to regulating open space, the City of West Covina also requires a minimum square footage for multi-family units. The specific regulations are shown in **Table 4-4**.

The minimum floor areas required depend on the unit location and zoning. For some units the minimum floor areas may be greater than the area that is typically required by private development standards 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. The City is committed to working with developers to ensure that this standard does not constrain the development of housing and allows modifications to minimum unit sizes as shown in **Table 4-6** as part of the density bonus regulations for qualifying developments.

**Table 4-6 Special Incentives: Modified Unit Size**

| Unit Type   | Minimum Square Footage |
|-------------|------------------------|
| Studio      | 500 square feet        |
| One Bedroom | 575 square feet        |
| Two Bedroom | 650 square feet        |

Source: West Covina Municipal Code §26-678.5(c).

## Code Enforcement

West Covina, like many other jurisdictions, includes property and building maintenance standards in its 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.

### 4.1.2 On-Site and Off-Site Improvements

Site improvements and property dedications are important components of new development and contribute to the creation of decent and affordable housing. For residential development the required site improvements will typically vary by size and location of the proposed development. Required improvements may include, but are not limited to:

- Street improvements (minor neighborhood streets in the City are a minimum 32 feet between exterior curbs)
- Adequate distribution lines for domestic water supply
- Sewage collecting system where main lines of an adequate disposal system are available
- Roadway paving to the street center line
- Street lighting
- Concrete curbs and gutters
- Full width concrete sidewalks (4-5 feet width)
- Street trees and appropriate irrigation systems
- Adequate grading and surfacing of streets, highways, and alleys
- Fire hydrants at locations recommended by the City Engineer and Fire Department
- Traffic control devices

- Necessary barricades and safety devices
- Fees for, or dedication of, parks and recreation facilities

The City of West Covina maintains a high engineering standard for curbs, gutters, sidewalks, and streets, and these standards regulate construction and such items as width and grade. In the past, the City has approved residential subdivisions with private streets where the standards have been modified to reduce housing costs. The City will continue to review the general development standards such as street width, parking lanes, and sidewalks, not only to result in lower costs, but also in a more pleasing appearance for the subdivision.

Site improvements, particularly infrastructure, such as upgrades to major and local streets; curbs, gutters, and sidewalks; water and sewer lines; storm drains; and street lighting can be viewed as a constraint to the development of affordable housing. In most cases, these improvements are dedicated to the City, which is then responsible for their maintenance. The cost of these facilities is borne by developers, is added to the cost of new housing units, and eventually is passed on to the homebuyer or property owner. West Covina, like many jurisdictions in Los Angeles County is almost entirely built out and already has existing infrastructure and roadways throughout the City. 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 that will not require further upgrades if a project is proposed. If improvements are necessary, the City may 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, such as assistance with on- and off-site improvements whenever feasible.

### 4.1.3 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 4-7**. In 2019 the City performed an analysis and updated the fee schedule. 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 4-7 City of West Covina Fee Schedule**

| Fee Type  | Fee Amount   |
|---|--|
| <b>Planning Commission – Public Hearing Items</b>   |  |
| Conditional Use Permit (CUP)<br>Development Plan (DP)<br>General Plan Amendment (GPA)<br>Precise Plan (PP)<br>Tentative Parcel or Tract Map (TPM-TTM)<br>Variance (VAR)<br>Zone Change (ZC)<br>Adult Oriented Businesses  | \$90 per hour of staff time<br>Actual cost of City Attorney<br>\$3,000 deposit required for CUP and Variance, \$2500 deposit for DP and Adult Oriented Business; \$8000 deposit for GPA, ZC, TTM; \$4000 deposit for PP and TPM, \$7000 deposit for PP at Downtown |
| <b>Miscellaneous Permits/Requests</b>   |  |
| Administrative Use Permit Includes:<br>Large Family Daycares<br>Outdoor Dining/Uses in O-U Zone<br>Single Family Dwelling Large Expansion<br>Maximum Unit Size Exception<br>Sign Exception Review<br>Retaining Walls/Elevated Structures<br>Mounted Wireless Telecommunication Facility | \$90 per hour of staff time<br>\$770 deposit required  |
| Administrative Review   | \$90 per hour of staff time<br>\$440 deposit required  |
| AIPP Review   | \$90 per hour of staff time<br>\$1,000 deposit required  |
| Appeal to Planning Commission   | \$750 non-refundable filing fee<br>\$90 per hour of staff time   |
| Appeal to Planning Commission (Non-Hearing Items)   | \$348 non-refundable filing fee<br>\$90 per hour of staff time   |
| Code, Covenants & Restrictions Review   | \$1,094 Flat Fee<br>Actual cost of City Attorney   |
| Conceptual Plan Review  | \$90 per hour of staff time<br>\$4,000 deposit required for all cases  |
| Covenant Preparation Fee  | \$559 Flat Fee   |
| Extension Time for TTM, TPM, PP, VAR, ZC  | \$948 Flat Fee   |
| Extension of Time for AUP   | \$175 Flat Fee   |
| Historic Property Certificate of Appropriateness  | \$3,040 Flat Fee   |
| Landscaping Plan Review & Inspection  | Actual cost of Consultant Review<br>\$2,500 deposit required   |
| Planning Directors Modification Review (includes Massage Technician Review and Model Home Marketing Complex)  | \$90 per hour of staff time<br>\$1,300 deposit required  |
| Preliminary Review Meeting  | \$3,000 Flat Fee   |
| Prospective Homeowners Awareness Package Review   | \$1,094 Flat Fee<br>Actual cost of City Attorney   |
| Slight Modification   | \$90 per hour of staff time<br>\$1,300 deposit required  |

Source: West Covina Fee Schedule, 2021.

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 4-8**). 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. 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.

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.

Fees charged in West Covina are comparable to those of surrounding communities in Los Angeles County and are not considered to be a constraint to the development of housing.

**Table 4-8 Development Impact Fee Summary**

| Impact Fees                       | Single Family   | Condo | Multi-Family | Mobile Home |
|-----------------------------------|---|-------|--------------|-------------|
| 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 three (3) 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  |       |              |             |
| 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.

#### 4.1.4 Processing and Permit Procedures

Builders and developers frequently cite the cost of holding land during the evaluation and review process as a significant factor to the cost of housing. Processing times vary with the complexity of the project. 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 of West Covina's development approval process is designed to facilitate appropriate development. **Table 4-9** provides a summary of typical processing times for various procedures from application to final approval. 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 may be typical of entitlement requests accompanying proposals for affordable housing.

**Table 4-9 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; however, 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 and consequently 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 schedule 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 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.

#### 4.1.5 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. However, one of the purposes of the City's Senior Housing Overlay Zone (SHO) is to ensure that federally regulated requirements related to the Americans Disabilities Act (ADA) and Universal Design principles are incorporated within senior housing developments. The City also has established procedures to ensure that reasonable accommodations are made for persons with disabilities.

In accordance with State law the City requires no discretionary review of small group homes for six or fewer residents. West Covina does not impose additional zoning, building code, or permitting procedures on small care facilities other than those allowed by State law. West Covina ensures that new housing developments including accessibility requirements comply with Tier 1 of the California Green Building Code and has not adopted any local amendments to the building standards. The City provides information to applicants or those inquiring of City regulations regarding accommodations in zoning, permit processes, and application of building codes for persons with disabilities. Additionally, the West Covina Zoning Code also allows for residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with ADA requirements.

City zoning laws, policies, and practices are compliant with fair housing law allowing for the construction of units that can accommodate the needs of residents with disabilities. Examples of ways in which the City facilitates housing for persons with disabilities through its regulatory and permitting processes include:

- Reasonable accommodation procedures have been established offering a formal clear process to apply for development standard modifications;
- Community care facilities of six or fewer persons are permitted as-of-right on the same basis as other single-family uses;
- Larger community care facilities may be permitted under the City's conditional use permit process, which seeks to ensure the suitability and adequacy of the site for the proposed use; adequate utilities and infrastructure is available on-site, and compatibility of design with adjacent uses within the district and its surroundings;
- Reduced parking requirements for special needs housing.

Additionally, the Land Use Element in the City's General Plan does not require, nor regulate the siting of special needs housing in relationship to one another. Based on its zoning, land use policies, and building code practices, as described above, there is no evidence that West Covina has created significant constraints to the location, construction, or cost of special needs housing for persons with disabilities.

#### 4.1.6 Other Housing-Related Regulations

In an effort to provide flexibility within the development standards in the West Covina Municipal Code there are a number of ordinances aimed at providing additional affordable housing in the City. These ordinances allow for density bonuses, accessory dwelling unit (ADU) development, homeless and transitional shelters, supportive housing, and two overlay districts. West Covina has implemented these ordinances to assist developers in providing quality and affordable housing throughout the City.

##### **Density Bonus**

In response to State-mandated requirements and local needs, the City has adopted regulations to permit higher densities than generally permitted. The West Covina Zoning Code provides housing incentives to assist in the provision of sound affordable housing for low- and moderate-income households and senior citizen households. In accordance with Sections 65915 et seq. of the California Government Code, the density bonus ordinance assists in achieving the goals and implementing the policies of the Housing Element and Comprehensive Housing Assistance Strategy.

Known as a “density bonus,” State law 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 Municipal Code also includes a section titled “Low and Moderate Income and Senior Citizen Housing.” This section specifically allows for density bonuses between 25% and 160% to offset land and construction costs. In addition, this section of the Code allows the modification of development standards to render the development economically feasible. This section of the Code is intended to facilitate the development of housing for low and very-low-income households that is restricted for a period of no less than 45 years for owners and 55 years for renters. The City promotes the use of the density bonus ordinance for senior housing, and in conjunction with mixed use projects and within Specific Plans.

Development projects that qualify for a mandatory density bonus will in addition to the density increase be granted incentives or concessions based on the affordability level and number of units. State density bonus law has been recently amended; therefore, Program 3.2 is included in the Housing Plan to monitor legislation and update the City’s density bonus regulations consistent with State law.

##### **Accessory Dwelling Unit Requirements**

In response to State requirements and local needs, the City of West Covina allows the development of both attached and detached accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs). Traditionally intended for elderly or other members of owner-occupant families, 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 current ADU regulations were adopted in April 2021 and are incorporated as Sec. 26-685.30 of the Municipal Code. These regulations are consistent with current State law. Program xx in the Housing Plan describes actions the City will take to encourage and facilitate production of ADUs.

## Emergency Shelters and Low Barrier Navigation Centers

**Emergency shelters** provide temporary housing for homeless persons 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 Zoning Code allows emergency shelters by-right (i.e., without a conditional use permit or other discretionary action) in the Light Manufacturing (M-1) zone. The M-1 zone is appropriate to accommodate emergency shelters as these areas are typically located along major roadways with access to employment centers and near stores and other services. The M-1 zone includes approximately 45 parcels totaling 60 acres. Of these sites approximately 11 parcels are between 0.5 and 5 acres in size, are underutilized and can accommodate a shelter of approximately 20 beds. Standards for emergency shelters are established in Municipal Code Sec. 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
- The facility shall operate on a first-come, first serve basis with clients only permitted on-site and admitted to the facility between 6:00 p.m. and 7:00 a.m. during Pacific Daylight Time, and 5:00 p.m. and 7:00 a.m. during Pacific Standard Time. Clients must vacate the facility by 8:00 a.m. and have no guaranteed bed for the next night. A curfew of 10:00 p.m. (or earlier) shall be established and strictly enforced and clients shall not be admitted after the curfew.
- Maximum stay of 120 days in a 365-day period
- Minimum distance of 300 feet shall be maintained from any other emergency shelter
- Minimum of 1 staff member per 15 beds shall be awake and on duty when the facility is open. Facility staff shall be trained in operating procedures, safety plans, and assisting clients. The facility shall not employ staff who have been convicted of a felony or who are required to register as a sex registrant under Penal Code 290.
- Bike rack parking
- Exterior lighting
- A waiting area with a minimum of 10 square feet per bed in a location not adjacent to the public right-of-way, and visually separated from public view by a minimum 6-foot tall visually screening decorative wall or fence
- Outdoor storage shall be screened from public view by a minimum 6-foot decorative wall or fence
- A minimum of 1 toilet and 1 shower per 8 beds per gender, and a private shower and toilet facility for each area designated for use by families
- An operational plan shall be provided for the review and approval of the planning director and police chief
- 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.

**Low barrier navigation centers.** AB 101 (2019) established 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:

- (1) 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
- (2) Accommodation of residents' pets
- (3) The storage of possessions
- (4) 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 meeting specified standards must be allowed by-right in areas zoned for mixed use and in nonresidential zones permitting multi-family uses. Program 3.1 is included in the Housing Plan to update City regulations consistent with AB 101.

## **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 of 2018 (Government Code Section 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. Program 3.1 is included in the Housing Plan to review and update City regulations regarding transitional and supportive housing as necessary to ensure consistent with current State law.

## **4.2 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.

### **4.2.1 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 a number of factors, most important of which are land availability and permitted development density. As land becomes scarcer, the price for land increases. Land prices are also positively correlated with the number of units permitted on each lot. Thus, 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.

## **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 on 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. For both single-family and multi-family construction there is wide variation in price, 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 Housing 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.

## **Financing**

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.

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.

#### **4.2.2 Environmental Constraints**

##### **Seismic Ground Shaking**

The potential for seismic activity and ground shaking in West Covina 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 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 West Covina, these are 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.

##### **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 West Covina 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.

#### **4.2.3 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 in West Covina 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

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# Housing Resources

This section summarizes the land, financial, and administrative resources available for the development and preservation of housing in West Covina. The analysis includes an evaluation of the availability of land resources for future housing development; the City's ability to satisfy its share of the region's future housing needs, the financial resources available to support housing activities, and the administrative resources available to assist in implementing 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. 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.

An analysis and inventory of potential sites for 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/or maintain rental units and purchase affordability for lower-income households and for persons with special needs. These programs are also available to other jurisdictions for potential acquisition, subsidy, or replacement of units at-risk. 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 Planning Division is managing the physical development of the City to promote health, safety and sustainability. The department ensures the City's viability through enforcement of land use, construction, health, safety, and environmental regulations. This involves land use and development standards, building codes, economic vitality, and adherence to the General Plan. It is also responsible for the administration of the General Plan and implementation of the Zoning Ordinance and Specific Plans.

## 5.3 Energy Conservation Opportunities

As residential energy costs rise, the subsequent increasing utility costs reduce the affordability of housing. State of California Energy Efficiency Standards for Residential and Nonresidential Buildings were established 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.<sup>1</sup>

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 while localities are responsible for enforcing the energy conservation regulations through the plan check and building inspection processes.

Local energy conservation programs 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 like So Cal Edison and So Cal Gas, 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.
- 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

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

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](http://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.

# Appendix A – Review of the Prior Housing Element

The Progress Report reviews the previous Housing Element's programs, objectives, and actions that were to be implemented during the previous planning period. The City of West Covina's Housing Element identified five goals that the City anticipated to implement during the previous 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 actions and objectives had a timeframe for completion along with a responsible agency to monitor the program.

The action is listed on the right column of the table and displays the quantified or qualified objective and the result of the program. Lastly, the action is evaluated on its effectiveness, and whether or not 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 their 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's housing goal;
- The effectiveness of the Housing Element in attainment of the community's housing goals and objectives; and,
- The progress of the City in the implementation of the Housing Element.

**Table 5-1 2013-2021 Housing Element Progress Report**

| Name of Program                         | Objective  | Timeframe in H.E. | Status of Program Implementation   |
|---|--|-------------------|--|
| 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 5 loans to West Covina homeowners.  |
| 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.  |
| 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                        | Utilize CDBG funds to continue the Code Enforcement program. 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 in order 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.  |
| 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.   |

| Name of Program                               | Objective  | Timeframe in H.E. | Status of Program Implementation   |
|---|--|-------------------|--|
| 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 website.   |
| 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.   |
| 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 in 2018.  |
| 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. No new mobile home parks proposed in 2020.   |
| Water and Sewer Service Providers             | Immediately following the adoption and certification of the Housing Element, Staff will  | Ongoing           | Letters mailed following adoption of Housing Element.  |

| Name of Program                                      | Objective  | Timeframe in H.E. | Status of Program Implementation  |
|--|--|-------------------|---|
|  | deliver copies to all providers of sewer and water service within the City of West Covina.   |                   |   |
| 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.   |
| 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 Disables 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.   |

| Name of Program                               | Objective  | Timeframe in H.E. | Status of Program Implementation   |
|---|--|-------------------|--|
| 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.                                       |
| 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 Municipal Code allows for the development of emergency shelters and efficiency units. No applications have been received.                              |

# Appendix B – Sites Inventory

This appendix describes the methodology and analysis for determining the City's residential land inventory for the 2021-2029 planning period.

## **Regional Housing Needs Assessment (RHNA)**

The City's RHNA allocation for the 2021-2029 period is as follows:

- Very-low-income – 1,653 units
- Low-income – 850 units
- Moderate-income – 865 units
- Above-moderate – 1,978 units
- Total – 5,346 units

## **Potential Sites to Accommodate the (RHNA)**

The inventory of sites for potential housing development is summarized in Table B-1. As seen in this table, the sites inventory is sufficient to accommodate the RHNA in all income categories.

**Table B-1  
Sites Inventory Summary**

|                                 | Income Category |       |       |           |        |
|---------------------------------|-----------------|-------|-------|-----------|--------|
|                                 | VL              | Low   | Mod   | Above Mod | Total  |
| Approved Projects (Table B-2)   | -               | -     | 867   | 55        | 922    |
| Underutilized Sites (Table B-3) | 2,000           | 1,390 | 1,000 | 5,762     | 10,152 |
| Total Sites Inventory           | 2,000           | 1,390 | 1,867 | 5,817     | 11,074 |
| RHNA 2021 - 2029                | 1,653           | 850   | 865   | 1,978     | 5,346  |
| Adequate Sites?                 | Yes             | Yes   | Yes   | Yes       | Yes    |

Source: City of West Covina, 2021

### Approved Projects

Proposed housing developments that have received approval are listed in Table B-2. These projects are assigned to affordability categories based on the expected sales price or rent.

### Underutilized Sites

As with many mature communities in the highly urban areas of Los Angeles County, West Covina has almost no vacant land suitable for residential development. Based on the “default density”

provisions of State law<sup>2</sup>, sites of at least one-half acre zoned to allow multi-family or mixed-use development at 30+ units/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.

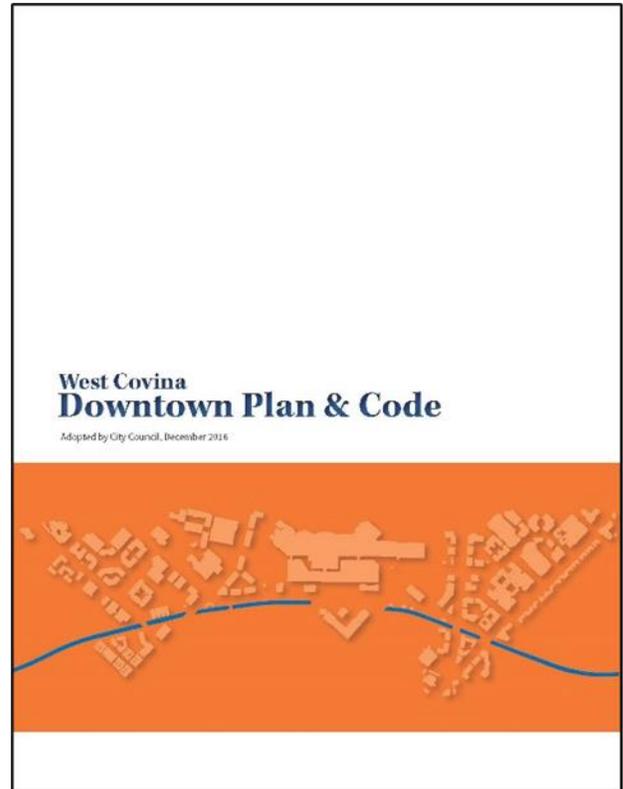
Pursuant to Government Code Sec. 65583.2(g)(2) when a city is relying on underutilized non-vacant sites to accommodate 50 percent or more of its lower-income housing need, the methodology used to determine additional development potential shall demonstrate that the existing use does not constitute an 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.

Underutilized sites suitable for housing development are listed in Table B-3. This table demonstrates that there is potential capacity for over 10,000 new housing units on these sites. All of the sites assigned to the lower-income categories are located within the area regulated by the Downtown Plan & Code. The General Plan establishes allowable densities of up to 54 units/acre in the Downtown.

A recent example of new mixed-use development in the Downtown is The Colony, a 5-story 450-unit project at a density of 68 units/acre. This project includes ground floor commercial with 4 residential levels above.

Each of the sites identified as suitable for lower-income housing has one or more of the following factors that enhance its potential for redevelopment during the planning period:

- Location near high-quality transit
- Vacant buildings or lower-value uses such as storage
- Low value of site improvements compared to land value (I/L ratio)
- Structures more than 40 years old



<sup>2</sup> California Government Code §65583.2(c)(3)(B)(iv)

- Low development intensity/density compared to the allowable intensity under current zoning
- Existing buildings are nonconforming
- Other nearby sites within the Downtown Plan area have recently been approved for housing development (see Table B-2 and photo above)

For all of these reasons, the sites listed in Table B-3 are considered suitable for development during the planning period. Potential capacity is estimated as 80% of the allowable density.

#### Availability of Infrastructure

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

#### 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.

**Table B-2  
Approved Projects**

| Project/Type                              | Address                     | General Plan           | Zoning                        | Parcel Size (acres) | Units   | Income Category   | Project Density | Approval Date |
|---|-----------------------------|------------------------|-------------------------------|---------------------|---|-------------------|-----------------|---------------|
| West Cameron II/<br>Townhouse             | 1600-1616 W. Cameron Avenue | Neighborhood High      | Downtown/T-4<br>General Urban | 3.25                | 84  | Moderate          | 25.8            | 2021          |
| Vincent Place Specific Plan/<br>Townhouse | 1024 W. Workman Avenue      | Neighborhood<br>Medium | Specific Plan                 | 8.05                | 119   | Moderate          | 14.8            | 2021          |
| Walnut Grove Specific Plan/<br>Townhouse  | 1651 E. Rowland Avenue      | Neighborhood<br>Medium | Specific Plan                 | 9.14                | 158   | Moderate          | 17.3            | 2021          |
| Cameron 56/<br>Townhouse                  | 1530 W. Cameron Avenue      | Neighborhood<br>Medium | Downtown/T-4<br>General Urban | 2.82                | 56  | Moderate          | 19.8            | 2018          |
| Pacific Lane/<br>Condo                    | 1920 W. Pacific Lane        | Neighborhood<br>Medium | MF-20                         | 0.62                | 7   | Above<br>moderate | 11.3            | 2018          |
| Holt Avenue/<br>Townhouse                 | 3228/3238/3244 Holt Avenue  | Neighborhood<br>Medium | Specific Plan                 | 5.35                | 48  | Above<br>moderate | 8.9             | 2014          |
| The Colony/<br>MU (5-story)               | 301 S. Glendora Avenue      | Neighborhood High      | Downtown/T-4<br>General Urban | 6.57                | 450   | Moderate          | 68.5            | 2013          |
| <b>TOTALS</b>                             |                             |                        |                               |                     | <b>867 Moderate</b><br><b>55 Above moderate</b> |                   |                 |               |

**Table B-3  
Underutilized Sites**

| APN        | Street Address   | Acres | General Plan | Zoning             | Downtown | Density | Lower | Mod | Above Mod | Total Units |
|------------|------------------|-------|--------------|--------------------|----------|---------|-------|-----|-----------|-------------|
| 8474007929 |                  | 2.97  | C            | General Urban Zone | Downtown | 20      |       | 47  |           | 47          |
| 8474007037 | WEST COVINA PKWY | 16.81 | C            | Urban Center Zone  | Downtown | 54      | 726   |     |           | 726         |
| 8474003051 | WEST COVINA PKY  | 3.09  | C            | Urban Center Zone  | Downtown | 54      | 133   |     |           | 133         |
| 8474007033 | FASHION PLAZA    | 0.22  | C            | General Urban Zone | Downtown | 20      |       | 3   |           | 3           |
| 8474003018 | WEST COVINA PKY  | 2.90  | C            | Urban Center Zone  | Downtown | 54      | 125   |     |           | 125         |
| 8474003057 | SUNSET AVE       | 2.10  | C            | General Urban Zone | Downtown | 20      |       | 33  |           | 33          |
| 8474007020 | VINCENT AVE      | 0.34  | C            | General Urban Zone | Downtown | 20      |       | 5   |           | 5           |
| 8474011026 | LAKES DR         | 0.99  | C            | General Urban Zone | Downtown | 20      |       | 15  |           | 15          |
| 8474001020 |                  | 4.02  | C            | Urban Center Zone  | Downtown | 54      | 173   |     |           | 173         |
| 8474003062 | GARVEY AVE S     | 2.38  | C            | General Urban Zone | Downtown | 20      |       | 38  |           | 38          |
| 8474007930 |                  | 3.43  | C            | General Urban Zone | Downtown | 20      |       | 54  |           | 54          |
| 8474003058 | SUNSET AVE       | 0.05  | C            | General Urban Zone | Downtown | 20      |       | 0   |           | 0           |
| 8474001012 | ORANGE AVE       | 2.09  | C            | Urban Center Zone  | Downtown | 54      | 90    |     |           | 90          |
| 8474007039 | FASHION PLAZA    | 0.10  | C            | Urban Center Zone  | Downtown | 54      |       | 4   |           | 4           |
| 8474003073 |                  | 0.54  | C            | General Urban Zone | Downtown | 20      |       | 8   |           | 8           |
| 8474007030 | CALIFORNIA AVE   | 0.26  | C            | General Urban Zone | Downtown | 20      |       | 4   |           | 4           |
| 8474007036 |                  | 0.55  | C            | Urban Center Zone  | Downtown | 54      | 23    |     |           | 23          |
| 8474007032 | FASHION PLAZA    | 0.14  | C            | General Urban Zone | Downtown | 20      |       | 2   |           | 2           |
| 8474003061 | WEST COVINA PKWY | 0.47  | C            | Urban Center Zone  | Downtown | 54      |       | 20  |           | 20          |
| 8475006053 | WEST COVINA PKWY | 0.34  | C            | General Urban Zone | Downtown | 20      |       | 5   |           | 5           |
| 8474007040 | FASHION PLAZA    | 0.16  | C            | General Urban Zone | Downtown | 20      |       | 2   |           | 2           |
| 8474001010 | ORANGE AVE       | 0.81  | C            | Urban Center Zone  | Downtown | 54      | 35    |     |           | 35          |
| 8474007041 | WEST COVINA PKWY | 2.43  | C            | Urban Center Zone  | Downtown | 54      | 105   |     |           | 105         |
| 8474003008 | SUNSET AVE       | 0.42  | C            | General Urban Zone | Downtown | 20      |       | 6   |           | 6           |
| 8475002034 | WEST COVINA PKWY | 5.25  | C            | General Urban Zone | Downtown | 20      |       | 84  |           | 84          |
| 8474011028 | LAKES DR         | 6.55  | C            | General Urban Zone | Downtown | 20      |       | 104 |           | 104         |
| 8474007031 | CALIFORNIA AVE   | 0.15  | C            | General Urban Zone | Downtown | 20      |       | 2   |           | 2           |
| 8474003060 | WEST COVINA PKWY | 0.28  | C            | Urban Center Zone  | Downtown | 54      |       | 12  |           | 12          |
| 8474011027 | LAKES DR         | 0.99  | C            | General Urban Zone | Downtown | 20      |       | 15  |           | 15          |
| 8474003009 | SUNSET AVE       | 0.64  | C            | General Urban Zone | Downtown | 20      |       | 10  |           | 10          |
| 8474007038 | FASHION PLAZA    | 0.63  | C            | General Urban Zone | Downtown | 20      |       | 10  |           | 10          |
| 8474003063 | WEST COVINA PKWY | 0.35  | C            | General Urban Zone | Downtown | 20      |       | 5   |           | 5           |
| 8474003021 | WEST COVINA PKWY | 0.85  | C            | Urban Center Zone  | Downtown | 54      | 36    |     |           | 36          |
| 8474003079 | FASHION PLAZA    | 15.13 | C            | Urban Center Zone  | Downtown | 54      | 653   |     |           | 653         |

| APN        | Street Address   | Acres | General Plan | Zoning             | Downtown | Density | Lower | Mod | Above Mod | Total Units |
|------------|------------------|-------|--------------|--------------------|----------|---------|-------|-----|-----------|-------------|
| 8474003064 | SUNSET AVE       | 0.95  | C            | General Urban Zone | Downtown | 20      |       | 15  |           | 15          |
| 8474007034 | FASHION PLAZA    | 1.07  | C            | General Urban Zone | Downtown | 20      |       | 17  |           | 17          |
| 8474003007 | SUNSET AVE       | 0.70  | C            | General Urban Zone | Downtown | 20      |       | 11  |           | 11          |
| 8474007019 | VINCENT AVE      | 0.08  | C            | General Urban Zone | Downtown | 20      |       | 1   |           | 1           |
| 8475002032 | WEST COVINA PKWY | 0.26  | C            | General Urban Zone | Downtown | 20      |       | 4   |           | 4           |
| 8474001020 |                  | 2.04  | C            | Urban Center Zone  | Downtown | 54      | 88    |     |           | 88          |
| 8474001020 |                  | 1.87  | C            | Urban Center Zone  | Downtown | 54      | 80    |     |           | 80          |
| 8474001020 |                  | 2.54  | C            | Urban Center Zone  | Downtown | 54      | 109   |     |           | 109         |
| 8474003010 | SUNSET AVE       | 0.19  | C            | General Urban Zone | Downtown | 20      |       | 2   |           | 2           |
| 8451012027 | WORKMAN AVE      | 0.72  | C            | R-C                |          | 20      |       | 11  |           | 11          |
| 8451012028 | EASTLAND CTR DR  | 1.12  | C            | R-C                |          | 20      |       | 17  |           | 17          |
| 8451012052 | BARRANCA ST      | 0.94  | C            | R-C                |          | 20      |       | 15  |           | 15          |
| 8451012036 | EASTLAND CTR DR  | 0.91  | C            | R-C                |          | 20      |       | 14  |           | 14          |
| 8451012044 | WORKMAN AVE      | 0.30  | C            | R-C                |          | 20      |       | 4   |           | 4           |
| 8451012037 | BARRANCA STREET  | 1.04  | C            | R-C                |          | 20      |       | 16  |           | 16          |
| 8451012054 | BARRANCA ST      | 1.16  | C            | R-C                |          | 20      |       | 18  |           | 18          |
| 8451012043 | EASTLAND CTR DR  | 1.04  | C            | R-C                |          | 20      |       | 16  |           | 16          |
| 8451012053 | BARRANCA ST      | 0.75  | C            | R-C                |          | 20      |       | 12  |           | 12          |
| 8451012016 | CITRUS ST        | 0.59  | C            | R-C                |          | 20      |       | 9   |           | 9           |
| 8451016104 | GARVEY AVE N     | 1.65  | C            | R-C                |          | 20      |       | 26  |           | 26          |
| 8453001021 | WORKMAN AVE      | 2.25  | C            | S-C                |          | 20      |       | 36  |           | 36          |
| 8453001010 | WORKMAN AVE      | 0.64  | C            | S-C                |          | 20      |       | 10  |           | 10          |
| 8453001051 | WORKMAN AVE      | 0.13  | C            | S-C                |          | 20      |       | 2   |           | 2           |
| 8453001047 | CITRUS ST        | 0.37  | C            | S-C                |          | 20      |       | 5   |           | 5           |
| 8453015030 | GARVEY AVE N     | 0.66  | C            | C-2                |          | 20      |       | 10  |           | 10          |
| 8453015006 | CITRUS ST        | 0.39  | C            | C-2                |          | 20      |       | 6   |           | 6           |
| 8453015034 | CITRUS ST        | 0.45  | C            | C-2                |          | 20      |       | 7   |           | 7           |
| 8453015020 | GARVEY AVE N     | 3.02  | C            | C-2                |          | 20      |       | 48  |           | 48          |
| 8453015031 | WORKMAN AVE      | 2.46  | C            | S-C                |          | 20      |       | 39  |           | 39          |
| 8453023018 | GARVEY AVE N     | 5.32  | C            | N-C                |          | 20      |       | 85  |           | 85          |
| 8454012023 | GARVEY AVE N     | 1.36  | C            | N-C                |          | 20      |       | 21  |           | 21          |
| 8454014009 | ROWLAND AVE      | 0.30  | C            | N-C                |          | 20      |       | 4   |           | 4           |
| 8454014011 | AZUSA AVE        | 2.60  | C            | N-C                |          | 20      |       | 41  |           | 41          |
| 8454018012 | AZUSA AVE        | 2.02  | C            | S-C                |          | 20      |       | 32  |           | 32          |
| 8454018024 | AZUSA AVE        | 0.84  | C            | S-C                |          | 20      |       | 13  |           | 13          |
| 8451015046 | GRAND AVE        | 0.66  | C            | C-2                |          | 20      |       | 10  |           | 10          |
| 8454016014 | AZUSA AVE        | 0.25  | C            | N-C                |          | 20      |       | 4   |           | 4           |

| APN        | Street Address | Acres | General Plan | Zoning | Downtown | Density | Lower | Mod | Above Mod | Total Units |
|------------|----------------|-------|--------------|--------|----------|---------|-------|-----|-----------|-------------|
| 8454016001 | AZUSA AVE      | 0.45  | C            | N-C    |          | 20      |       | 7   |           | 7           |
| 8454014010 | THELBORN ST    | 0.87  | C            | S-C    |          | 20      |       | 13  |           | 13          |
| 8454016022 | AZUSA AVE      | 0.29  | C            | N-C    |          | 20      |       | 4   |           | 4           |
| 8454016019 | AZUSA AVE      | 0.57  | C            | N-C    |          | 20      |       | 9   |           | 9           |
| 8454016006 | WORKMAN AVE    | 0.46  | C            | O-P    |          | 20      |       | 7   |           | 7           |
| 8454016013 | AZUSA AVE      | 0.85  | C            | O-P    |          | 20      |       | 13  |           | 13          |
| 8454016021 | AZUSA AVE      | 0.33  | C            | N-C    |          | 20      |       | 5   |           | 5           |
| 8454018013 | AZUSA AVE      | 3.69  | C            | S-C    |          | 20      |       | 58  |           | 58          |
| 8454016015 | AZUSA AVE      | 0.08  | C            | O-P    |          | 20      |       | 1   |           | 1           |
| 8455001023 | AZUSA AVE      | 13.39 | C            | S-C    |          | 20      |       | 214 |           | 214         |
| 8455014013 | AZUSA AVE      | 0.79  | C            | N-C    |          | 20      |       | 12  |           | 12          |
| 8455014014 | AZUSA AVE      | 0.51  | C            | N-C    |          | 20      |       | 8   |           | 8           |
| 8455014020 | AZUSA AVE      | 0.17  | C            | S-C    |          | 20      |       | 2   |           | 2           |
| 8455014018 | AZUSA AVE      | 0.18  | C            | S-C    |          | 20      |       | 2   |           | 2           |
| 8455014019 | AZUSA AVE      | 0.17  | C            | S-C    |          | 20      |       | 2   |           | 2           |
| 8455022023 | AZUSA AVE      | 1.09  | C            | S-C    |          | 20      |       | 17  |           | 17          |
| 8457019003 | GARVEY AVE N   | 0.81  | C            | C-2    |          | 20      |       | 13  |           | 13          |
| 8458020006 | SUNSET AVE     | 0.49  | C            | O-P    |          | 20      |       | 7   |           | 7           |
| 8458020007 | SUNSET AVE     | 0.25  | C            | O-P    |          | 20      |       | 4   |           | 4           |
| 8458023017 | GARVEY AVE N   | 0.76  | C            | O-P    |          | 20      |       | 12  |           | 12          |
| 8458023020 | GARVEY AVE N   | 0.77  | C            | N-C    |          | 20      |       | 12  |           | 12          |
| 8458023027 | SUNSET AVE     | 0.96  | C            | O-P    |          | 20      |       | 15  |           | 15          |
| 8458025005 | HARBERT ST     | 0.21  | C            | N-C    |          | 20      |       | 3   |           | 3           |
| 8458025007 | GARVEY AVE N   | 0.43  | C            | N-C    |          | 20      |       | 6   |           | 6           |
| 8458025029 | GARVEY AVE N   | 0.32  | C            | N-C    |          | 20      |       | 5   |           | 5           |
| 8458025026 | GARVEY AVE N   | 0.15  | C            | N-C    |          | 20      |       | 2   |           | 2           |
| 8458025022 | GARVEY AVE N   | 0.25  | C            | N-C    |          | 20      |       | 4   |           | 4           |
| 8458025025 | HARBERT ST     | 0.27  | C            | MF-20  |          | 20      |       | 4   |           | 4           |
| 8458025015 | HARBERT ST     | 0.44  | C            | N-C    |          | 20      |       | 7   |           | 7           |
| 8458025028 | LANG AVE       | 0.39  | C            | N-C    |          | 20      |       | 6   |           | 6           |
| 8458025030 | GARVEY AVE N   | 0.94  | C            | S-C    |          | 20      |       | 15  |           | 15          |
| 8458027024 | ORANGE AVE     | 0.66  | C            | N-C    |          | 20      |       | 10  |           | 10          |
| 8458027046 | GARVEY AVE N   | 1.71  | C            | S-C    |          | 20      |       | 27  |           | 27          |
| 8458027030 | LANG AVE       | 0.18  | C            | O-P    |          | 20      |       | 2   |           | 2           |
| 8459026028 | ORANGE AVE     | 0.47  | C            | N-C    |          | 20      |       | 7   |           | 7           |
| 8459026001 | PACIFIC AVE    | 0.64  | C            | N-C    |          | 20      |       | 10  |           | 10          |
| 8459026097 | PACIFIC AVE    | 0.87  | C            | O-P    |          | 20      |       | 13  |           | 13          |

| APN        | Street Address   | Acres | General Plan | Zoning | Downtown | Density | Lower | Mod | Above Mod | Total Units |
|------------|------------------|-------|--------------|--------|----------|---------|-------|-----|-----------|-------------|
| 8459027001 | PACIFIC AVE      | 0.56  | C            | N-C    |          | 20      |       | 8   |           | 8           |
| 8434015034 | LARK ELLEN AVE   | 2.39  | C            | R-1    |          | 20      |       | 38  |           | 38          |
| 8434015033 | LARK ELLEN AVE   | 1.00  | C            | R-1    |          | 20      |       | 16  |           | 16          |
| 8442018011 | AZUSA AVE        | 0.75  | C            | S-C    |          | 20      |       | 11  |           | 11          |
| 8442018012 | ROWLAND AVE      | 0.27  | C            | S-C    |          | 20      |       | 4   |           | 4           |
| 8442018014 | AZUSA AVE        | 0.59  | C            | S-C    |          | 20      |       | 9   |           | 9           |
| 8442018024 | AZUSA AVE        | 0.73  | C            | S-C    |          | 20      |       | 11  |           | 11          |
| 8443019019 | AZUSA AVE        | 0.90  | C            | N-C    |          | 20      |       | 14  |           | 14          |
| 8733012030 | NOGALES ST       | 0.61  | C            | PCD-1  |          | 20      |       | 9   |           | 9           |
| 8733012032 | NOGALES ST       | 1.38  | C            | PCD-1  |          | 20      |       | 22  |           | 22          |
| 8733012033 | NOGALES ST       | 0.19  | C            | PCD-1  |          | 20      |       | 3   |           | 3           |
| 8468001045 | MERCED AVE       | 0.45  | C            | N-C    |          | 20      |       | 7   |           | 7           |
| 8468001051 | MERCED AVE       | 0.56  | C            | N-C    |          | 20      |       | 9   |           | 9           |
| 8469003010 | ROSEWAY ST       | 0.21  | C            | O-P    |          | 20      |       | 3   |           | 3           |
| 8469003009 | SUNSET AVE       | 0.22  | C            | O-P    |          | 20      |       | 3   |           | 3           |
| 8469003011 | ROSEWAY ST       | 0.21  | C            | O-P    |          | 20      |       | 3   |           | 3           |
| 8469019018 | GLENDORA AVE     | 0.19  | C            | N-C    |          | 20      |       | 3   |           | 3           |
| 8469019016 | GLENDORA AVE     | 0.19  | C            | N-C    |          | 20      |       | 3   |           | 3           |
| 8469019015 | GLENDORA AVE     | 0.15  | C            | N-C    |          | 20      |       | 2   |           | 2           |
| 8470005021 | SUNSET AVE       | 0.82  | C            | O-P    |          | 20      |       | 13  |           | 13          |
| 8470005022 | SUNSET AVE       | 2.08  | C            | O-P    |          | 20      |       | 33  |           | 33          |
| 8471001011 | FRANCISQUITO AVE | 0.53  | C            | N-C    |          | 20      |       | 8   |           | 8           |
| 8471001012 | FRANCISQUITO AVE | 0.30  | C            | N-C    |          | 20      |       | 4   |           | 4           |
| 8471001013 | FRANCISQUITO AVE | 3.16  | C            | N-C    |          | 20      |       | 50  |           | 50          |
| 8471001015 | FRANCISQUITO AVE | 0.30  | C            | N-C    |          | 20      |       | 4   |           | 4           |
| 8471001016 | FRANCISQUITO AVE | 8.46  | C            | N-C    |          | 20      |       | 135 |           | 135         |
| 8743006041 | AMAR RD          | 0.92  | C            | N-C    |          | 20      |       | 14  |           | 14          |
| 8743006042 | AMAR RD          | 1.95  | C            | N-C    |          | 20      |       | 31  |           | 31          |
| 8743006043 | AMAR RD          | 1.97  | C            | N-C    |          | 20      |       | 31  |           | 31          |
| 8743006044 | AMAR RD          | 0.33  | C            | N-C    |          | 20      |       | 5   |           | 5           |
| 8743006046 | AMAR RD          | 0.49  | C            | N-C    |          | 20      |       | 7   |           | 7           |
| 8475010013 | GLENDORA AVE     | 0.26  | C            | N-C    |          | 20      |       | 4   |           | 4           |
| 8475010014 | GLENDORA AVE     | 0.18  | C            | N-C    |          | 20      |       | 2   |           | 2           |
| 8475010015 | GLENDORA AVE     | 0.23  | C            | N-C    |          | 20      |       | 3   |           | 3           |
| 8475010023 | GLENDORA AVE     | 2.25  | C            | S-C    |          | 20      |       | 36  |           | 36          |
| 8475010021 | SERVICE AVE      | 0.35  | C            | R-1    |          | 20      |       | 5   |           | 5           |
| 8475010022 | GLENDORA AVE     | 2.28  | C            | S-C    |          | 20      |       | 36  |           | 36          |

| APN        | Street Address   | Acres | General Plan | Zoning | Downtown | Density | Lower | Mod | Above Mod | Total Units |
|------------|------------------|-------|--------------|--------|----------|---------|-------|-----|-----------|-------------|
| 8475010024 | SERVICE AVE      | 0.19  | C            | N-C    |          | 20      |       | 3   |           | 3           |
| 8477002013 | AZUSA AVE        | 0.96  | C            | O-P    |          | 20      |       | 15  |           | 15          |
| 8477001020 | AZUSA AVE        | 0.71  | C            | N-C    |          | 20      |       | 11  |           | 11          |
| 8477001021 | AZUSA AVE        | 0.68  | C            | N-C    |          | 20      |       | 10  |           | 10          |
| 8743023028 | AZUSA AVE        | 1.39  | C            | PCD-1  |          | 20      |       | 22  |           | 22          |
| 8743023030 | AZUSA AVE        | 4.95  | C            | PCD-1  |          | 20      |       | 79  |           | 79          |
| 8490022031 | FLEETWELL AVE    | 0.27  | C            | R-1    |          | 20      |       | 4   |           | 4           |
| 8490022038 | AZUSA AVE        | 0.32  | C            | N-C    |          | 20      |       | 5   |           | 5           |
| 8490022035 | AZUSA AVE        | 0.37  | C            | N-C    |          | 20      |       | 5   |           | 5           |
| 8490022034 | AZUSA AVE        | 0.13  | C            | N-C    |          | 20      |       | 2   |           | 2           |
| 8490022036 | FRANCISQUITO AVE | 0.37  | C            | N-C    |          | 20      |       | 5   |           | 5           |
| 8725001018 | VALLEY BLVD      | 0.68  | C            | S-C    |          | 20      |       | 10  |           | 10          |
| 8730004026 | AZUSA AVE        | 0.45  | C            | C-3    |          | 20      |       | 7   |           | 7           |
| 8730004023 | AMAR RD          | 1.67  | C            | C-3    |          | 20      |       | 26  |           | 26          |
| 8730004018 | AMAR RD          | 3.00  | C            | S-C    |          | 20      |       | 47  |           | 47          |
| 8730004017 | AMAR RD          | 1.71  | C            | S-C    |          | 20      |       | 27  |           | 27          |
| 8730004029 | AZUSA AVE        | 7.27  | C            | C-3    |          | 20      |       | 116 |           | 116         |
| 8730004028 | AZUSA AVE        | 0.33  | C            | C-3    |          | 20      |       | 5   |           | 5           |
| 8731007247 | AMAR RD          | 2.00  | C            | PCD-1  |          | 20      |       | 31  |           | 31          |
| 8463002010 | MERCED AVE       | 1.43  | C            | MF-20  |          | 20      |       | 22  |           | 22          |
| 8479001009 | GARVEY AVE S     | 1.31  | C            | N-C    |          | 20      |       | 21  |           | 21          |
| 8463026019 | FRANCISQUITO AVE | 0.50  | C            | C-2    |          | 20      |       | 8   |           | 8           |
| 8480001028 | GARVEY AVE S     | 1.10  | C            | N-C    |          | 20      |       | 17  |           | 17          |
| 8480002025 | GARVEY AVE S     | 0.56  | C            | N-C    |          | 20      |       | 8   |           | 8           |
| 8480002049 | GARVEY AVE S     | 0.37  | C            | N-C    |          | 20      |       | 5   |           | 5           |
| 8480002026 | GARVEY AVE S     | 0.37  | C            | N-C    |          | 20      |       | 5   |           | 5           |
| 8480002046 | GARVEY AVE S     | 0.33  | C            | N-C    |          | 20      |       | 5   |           | 5           |
| 8480002047 | GARVEY AVE S     | 0.57  | C            | S-C    |          | 20      |       | 9   |           | 9           |
| 8480002048 | GARVEY AVE S     | 0.37  | C            | S-C    |          | 20      |       | 5   |           | 5           |
| 8735001024 | AZUSA AVE        | 0.46  | C            | S-C    |          | 20      |       | 7   |           | 7           |
| 8735004009 | AMAR RD          | 4.68  | C            | PCD-1  |          | 20      |       | 74  |           | 74          |
| 8735004005 | AZUSA AVE        | 0.86  | C            | PCD-1  |          | 20      |       | 13  |           | 13          |
| 8735004003 | AZUSA AVE        | 1.46  | C            | PCD-1  |          | 20      |       | 23  |           | 23          |
| 8735004006 | AZUSA AVE        | 0.45  | C            | PCD-1  |          | 20      |       | 7   |           | 7           |
| 8735001029 | AZUSA AVE        | 14.89 | C            | S-C    |          | 20      |       | 238 |           | 238         |
| 8735001030 | AZUSA AVE        | 14.03 | C            | S-C    |          | 20      |       | 224 |           | 224         |
| 8735001027 | AZUSA AVE        | 1.43  | C            | S-C    |          | 20      |       | 22  |           | 22          |

| APN        | Street Address   | Acres | General Plan | Zoning | Downtown | Density | Lower | Mod | Above Mod | Total Units |
|------------|------------------|-------|--------------|--------|----------|---------|-------|-----|-----------|-------------|
| 8735001028 | AZUSA AVE        | 1.48  | C            | S-C    |          | 20      |       | 23  |           | 23          |
| 8735001031 | AZUSA AVE        | 8.93  | C            | S-C    |          | 20      |       | 142 |           | 142         |
| 8735001025 | AZUSA AVE        | 0.79  | C            | S-C    |          | 20      |       | 12  |           | 12          |
| 8735001026 | AZUSA AVE        | 0.79  | C            | S-C    |          | 20      |       | 12  |           | 12          |
| 8480016001 | CITRUS ST        | 0.40  | C            | C-2    |          | 20      |       | 6   |           | 6           |
| 8465001003 | FRANCISQUITO AVE | 0.12  | C            | N-C    |          | 20      |       | 1   |           | 1           |
| 8465001019 | FRANCISQUITO AVE | 0.38  | C            | N-C    |          | 20      |       | 6   |           | 6           |
| 8467001015 | FRANCISQUITO AVE | 0.51  | C            | N-C    |          | 20      |       | 8   |           | 8           |
| 8467001012 | FRANCISQUITO AVE | 0.20  | C            | N-C    |          | 20      |       | 3   |           | 3           |
| 8493040179 | AZUSA AVE        | 9.03  | C            | N-C    |          | 20      |       | 144 |           | 144         |
| 8493040180 | AZUSA AVE        | 0.40  | C            | N-C    |          | 20      |       | 6   |           | 6           |
| 8725017013 | VALLEY BLVD      | 0.22  | C            | C-3    |          | 20      |       | 3   |           | 3           |
| 8725017015 | VALLEY BLVD      | 0.45  | C            | C-3    |          | 20      |       | 7   |           | 7           |
| 8734001039 | NOGALES ST       | 0.46  | C            | PCD-1  |          | 20      |       | 7   |           | 7           |
| 8734001031 | NOGALES ST       | 1.00  | C            | PCD-1  |          | 20      |       | 15  |           | 15          |
| 8734001033 | NOGALES ST       | 0.86  | C            | PCD-1  |          | 20      |       | 13  |           | 13          |
| 8734001034 | NOGALES ST       | 2.41  | C            | PCD-1  |          | 20      |       | 38  |           | 38          |
| 8734001032 | NOGALES ST       | 0.37  | C            | PCD-1  |          | 20      |       | 5   |           | 5           |
| 8734001042 | NOGALES ST       | 2.45  | C            | PCD-1  |          | 20      |       | 39  |           | 39          |
| 8734001048 | NOGALES ST       | 0.41  | C            | PCD-1  |          | 20      |       | 6   |           | 6           |
| 8734001047 | NOGALES ST       | 0.33  | C            | PCD-1  |          | 20      |       | 5   |           | 5           |
| 8734001043 | NOGALES ST       | 0.07  | C            | PCD-1  |          | 20      |       | 1   |           | 1           |
| 8734001044 | NOGALES ST       | 0.38  | C            | PCD-1  |          | 20      |       | 6   |           | 6           |
| 8437024011 | BADILLO ST       | 1.59  | C            | N-C    |          | 20      |       | 25  |           | 25          |
| 8735004001 | AMAR RD          | 1.93  | C            | PCD-1  |          | 20      |       | 30  |           | 30          |
| 8469019017 | GLENDORA AVE     | 8.46  | C            | N-C    |          | 20      |       | 135 |           | 135         |
| 8451016105 | GARVEY AVE N     | 1.78  | C            | R-C    |          | 20      |       | 28  |           | 28          |
| 8451016100 | GARVEY AVE N     | 1.65  | C            | R-C    |          | 20      |       | 26  |           | 26          |
| 8735004012 | AMAR RD          | 0.60  | C            | PCD-1  |          | 20      |       | 9   |           | 9           |
| 8735004011 | AZUSA AVE        | 0.86  | C            | PCD-1  |          | 20      |       | 13  |           | 13          |
| 8735004010 | AMAR RD          | 1.99  | C            | PCD-1  |          | 20      |       | 31  |           | 31          |
| 8451016113 | GARVEY AVE N     | 2.95  | C            | R-C    |          | 20      |       | 47  |           | 47          |
| 8470005025 | SUNSET AVE       | 2.11  | C            | O-P    |          | 20      |       | 33  |           | 33          |
| 8470005004 | SUNSET AVE       | 0.47  | C            | N-C    |          | 20      |       | 7   |           | 7           |
| 8734001046 | NOGALES ST       | 0.13  | C            | PCD-1  |          | 20      |       | 2   |           | 2           |
| 8458023025 | GARVEY AVE N     | 0.85  | C            | S-C    |          | 20      |       | 13  |           | 13          |
| 8458023022 | GARVEY AVE N     | 0.95  | C            | S-C    |          | 20      |       | 15  |           | 15          |

| APN                          | Street Address   | Acres | General Plan | Zoning             | Downtown | Density | Lower        | Mod          | Above Mod | Total Units  |
|------------------------------|------------------|-------|--------------|--------------------|----------|---------|--------------|--------------|-----------|--------------|
| 8480016002                   | CITRUS ST        | 2.61  | C            | C-2                |          | 20      |              | 41           |           | 41           |
| 8480001022                   | GARVEY AVE S     | 0.93  | C            | C-2                |          | 20      |              | 14           |           | 14           |
| 8480001030                   | GARVEY AVE S     | 0.52  | C            | C-2                |          | 20      |              | 8            |           | 8            |
| 8480001029                   | GARVEY AVE S     | 1.62  | C            | C-2                |          | 20      |              | 25           |           | 25           |
| 8480001017                   | GARVEY AVE S     | 0.37  | C            | C-2                |          | 20      |              | 5            |           | 5            |
| 8480016024                   | GARVEY AVE S     | 3.22  | C            | S-C                |          | 20      |              | 51           |           | 51           |
| 8480016023                   | GARVEY AVE S     | 1.25  | C            | C-2                |          | 20      |              | 19           |           | 19           |
| 8480016021                   | GARVEY AVE S     | 3.94  | C            | C-2                |          | 20      |              | 62           |           | 62           |
| 8480002057                   | GARVEY AVE S     | 0.88  | C            | N-C                |          | 20      |              | 14           |           | 14           |
| 8725001025                   | NOGALES ST       | 0.67  | C            | O-P                |          | 20      |              | 10           |           | 10           |
| 8725001017                   | VALLEY BLVD      | 0.38  | C            | S-C                |          | 20      |              | 6            |           | 6            |
| 8458023026                   | SUNSET AVE       | 0.64  | C            | S-C                |          | 20      |              | 10           |           | 10           |
| 8451012047                   | BARRANCA ST      | 0.45  | C            | R-C                |          | 20      |              | 7            |           | 7            |
| 8480002058                   | GARVEY AVE S     | 0.72  | C            | N-C                |          | 20      |              | 11           |           | 11           |
| 8451012055                   | EASTLAND CTR DR  | 38.49 | C            | R-C                |          | 20      |              | 615          |           | 615          |
| 8442018019                   | AZUSA AVE        | 0.70  | C            | N-C                |          | 20      |              | 11           |           | 11           |
| 8443003022                   | AZUSA AVE        | 1.40  | C            | N-C                |          | 20      |              | 22           |           | 22           |
| 8455001023                   | AZUSA AVE        | 3.51  | C            | S-C                |          | 20      |              | 56           |           | 56           |
| <b>Subtotal - Commercial</b> |                  |       |              |                    |          |         | <b>2,376</b> | <b>5,278</b> | <b>0</b>  | <b>7,654</b> |
| 8474011046                   | GLENDORA AVE     | 2.33  | NH           | General Urban Zone | Downtown | 54      | 100          |              |           | 100          |
| 8474011040                   | GLENDORA AVE     | 4.10  | NH           | General Urban Zone | Downtown | 54      | 176          |              |           | 176          |
| 8474009009                   |                  | 0.98  | NH           | General Urban Zone | Downtown | 54      | 42           |              |           | 42           |
| 8474009003                   | GLENDORA AVE     | 0.47  | NH           | General Urban Zone | Downtown | 54      |              | 20           |           | 20           |
| 8474009005                   | WEST COVINA PKWY | 0.14  | NH           | General Urban Zone | Downtown | 54      |              | 5            |           | 5            |
| 8474009010                   | GLENDORA AVE     | 0.68  | NH           | General Urban Zone | Downtown | 54      | 29           |              |           | 29           |
| 8474009008                   | VINCENT AVE      | 0.33  | NH           | General Urban Zone | Downtown | 54      |              | 14           |           | 14           |
| 8474009011                   | GLENDORA AVE     | 0.48  | NH           | General Urban Zone | Downtown | 54      |              | 20           |           | 20           |
| 8474002004                   |                  | 0.49  | NH           | General Urban Zone | Downtown | 54      |              | 21           |           | 21           |
| 8474002014                   | CAMERON AVE      | 1.17  | NH           | General Urban Zone | Downtown | 54      | 50           |              |           | 50           |
| 8474002015                   | CAMERON AVE      | 5.57  | NH           | General Urban Zone | Downtown | 54      | 240          |              |           | 240          |
| 8474009001                   | VINCENT AVE      | 1.01  | NH           | General Urban Zone | Downtown | 54      | 43           |              |           | 43           |
| 8474002013                   | WEST COVINA PKWY | 0.87  | NH           | General Urban Zone | Downtown | 54      | 37           |              |           | 37           |
| 8474002016                   | WEST COVINA PKWY | 1.56  | NH           | General Urban Zone | Downtown | 54      | 67           |              |           | 67           |
| 8474011043                   | LAKES DR         | 0.39  | NH           | General Urban Zone | Downtown | 54      | 16           |              |           | 16           |
| 8474011047                   | LAKES DR         | 0.72  | NH           | General Urban Zone | Downtown | 54      | 31           |              |           | 31           |
| 8474002005                   | WEST COVINA PKWY | 0.80  | NH           | General Urban Zone | Downtown | 54      | 34           |              |           | 34           |
| 8474002019                   | WEST COVINA PKWY | 1.53  | NH           | General Urban Zone | Downtown | 54      | 66           |              |           | 66           |

| APN                                | Street Address | Acres | General Plan | Zoning             | Downtown | Density | Lower      | Mod       | Above Mod | Total Units  |
|------------------------------------|----------------|-------|--------------|--------------------|----------|---------|------------|-----------|-----------|--------------|
| 8474011943                         | LAKES DR       | 0.95  | NH           | General Urban Zone | Downtown | 54      | 40         |           |           | 40           |
| <b>Subtotal – Neighborhood HDR</b> |                |       |              |                    |          |         | <b>971</b> | <b>80</b> | <b>0</b>  | <b>1,051</b> |
| 8476024013                         | GLENDORA AVE   | 2.25  | NM           | General Urban Zone | Downtown | 20      |            | 36        |           | 36           |
| 8476024005                         | GLENDORA AVE   | 0.32  | NM           | General Urban Zone | Downtown | 20      |            | 5         |           | 5            |
| 8476024003                         | GLENDORA AVE   | 1.27  | NM           | General Urban Zone | Downtown | 20      |            | 20        |           | 20           |
| 8476024004                         | GLENDORA AVE   | 0.08  | NM           | General Urban Zone | Downtown | 20      |            | 1         |           | 1            |
| 8468007037                         | GARVEY AVE S   | 2.06  | NM           | General Urban Zone | Downtown | 20      |            | 32        |           | 32           |
| 8468015025                         | CAMERON AVE    | 0.13  | NM           | General Urban Zone | Downtown | 20      |            | 2         |           | 2            |
| 8468015027                         | CAMERON AVE    | 0.13  | NM           | General Urban Zone | Downtown | 20      |            | 2         |           | 2            |
| 8468007040                         | ORANGE AVE     | 1.69  | NM           | General Urban Zone | Downtown | 20      |            | 26        |           | 26           |
| 8468015024                         | CAMERON AVE    | 1.01  | NM           | General Urban Zone | Downtown | 54      | 43         |           |           | 43           |
| 8468015029                         | CAMERON AVE    | 0.14  | NM           | General Urban Zone | Downtown | 20      |            | 2         |           | 2            |
| 8468015031                         | CAMERON AVE    | 0.14  | NM           | General Urban Zone | Downtown | 20      |            | 2         |           | 2            |
| 8468016009                         | CAMERON AVE    | 1.62  | NM           | General Urban Zone | Downtown | 20      |            | 25        |           | 25           |
| 8468015026                         | CAMERON AVE    | 0.12  | NM           | General Urban Zone | Downtown | 20      |            | 1         |           | 1            |
| 8468015010                         | CAMERON AVE    | 2.22  | NM           | General Urban Zone | Downtown | 20      |            | 35        |           | 35           |
| 8468015030                         | CAMERON AVE    | 0.14  | NM           | General Urban Zone | Downtown | 20      |            | 2         |           | 2            |
| 8468015032                         |                | 2.03  | NM           | General Urban Zone | Downtown | 20      |            | 32        |           | 32           |
| 8468015028                         | CAMERON AVE    | 0.14  | NM           | General Urban Zone | Downtown | 20      |            | 2         |           | 2            |
| 8475007030                         | VINCENT AVE    | 0.21  | NM           | General Urban Zone | Downtown | 20      |            | 3         |           | 3            |
| 8475007042                         | GLENDORA AVE   | 0.62  | NM           | General Urban Zone | Downtown | 20      |            | 9         |           | 9            |
| 8474002010                         | SUNSET AVE     | 1.28  | NM           | General Urban Zone | Downtown | 20      |            | 20        |           | 20           |
| 8475007039                         | VINCENT AVE    | 0.41  | NM           | General Urban Zone | Downtown | 20      |            | 6         |           | 6            |
| 8475007028                         | GLENDORA AVE   | 0.33  | NM           | General Urban Zone | Downtown | 20      |            | 5         |           | 5            |
| 8475007036                         | VINCENT AVE    | 4.85  | NM           | General Urban Zone | Downtown | 20      |            | 77        |           | 77           |
| 8475007031                         | GLENDORA AVE   | 0.59  | NM           | General Urban Zone | Downtown | 20      |            | 9         |           | 9            |
| 8475007020                         | GLENDORA AVE   | 0.47  | NM           | General Urban Zone | Downtown | 20      |            | 7         |           | 7            |
| 8476009041                         | GLENDORA AVE   | 0.07  | NM           | General Urban Zone | Downtown | 20      |            | 1         |           | 1            |
| 8476009042                         | GLENDORA AVE   | 0.11  | NM           | General Urban Zone | Downtown | 20      |            | 1         |           | 1            |
| 8476009040                         | GLENDORA AVE   | 0.07  | NM           | General Urban Zone | Downtown | 20      |            | 1         |           | 1            |
| 8476008011                         | GLENDORA AVE   | 0.87  | NM           | General Urban Zone | Downtown | 20      |            | 13        |           | 13           |
| 8476009038                         | GLENDORA AVE   | 0.13  | NM           | General Urban Zone | Downtown | 20      |            | 2         |           | 2            |
| 8476009036                         | GLENDORA AVE   | 0.35  | NM           | General Urban Zone | Downtown | 20      |            | 5         |           | 5            |
| 8476009037                         |                | 0.07  | NM           | General Urban Zone | Downtown | 20      |            | 1         |           | 1            |
| 8476012019                         | GLENDORA AVE   | 0.52  | NM           | General Urban Zone | Downtown | 20      |            | 8         |           | 8            |
| 8476011036                         | GLENDORA AVE   | 0.09  | NM           | General Urban Zone | Downtown | 20      |            | 1         |           | 1            |
| 8476012021                         | GLENDORA AVE   | 0.11  | NM           | General Urban Zone | Downtown | 20      |            | 1         |           | 1            |

| APN        | Street Address | Acres | General Plan | Zoning             | Downtown | Density | Lower | Mod | Above Mod | Total Units |
|------------|----------------|-------|--------------|--------------------|----------|---------|-------|-----|-----------|-------------|
| 8476008014 | GLENDORA AVE   | 0.18  | NM           | General Urban Zone | Downtown | 20      |       | 2   |           | 2           |
| 8476009039 | GLENDORA AVE   | 0.06  | NM           | General Urban Zone | Downtown | 20      |       | 1   |           | 1           |
| 8476011040 | GLENDORA AVE   | 0.12  | NM           | General Urban Zone | Downtown | 20      |       | 1   |           | 1           |
| 8476012022 | GLENDORA AVE   | 0.24  | NM           | General Urban Zone | Downtown | 20      |       | 3   |           | 3           |
| 8476009034 | GLENDORA AVE   | 0.17  | NM           | General Urban Zone | Downtown | 20      |       | 2   |           | 2           |
| 8476011044 | GLENDORA AVE   | 0.26  | NM           | General Urban Zone | Downtown | 20      |       | 4   |           | 4           |
| 8476011042 | GLENDORA AVE   | 0.11  | NM           | General Urban Zone | Downtown | 20      |       | 1   |           | 1           |
| 8476011041 | GLENDORA AVE   | 0.07  | NM           | General Urban Zone | Downtown | 20      |       | 1   |           | 1           |
| 8476011037 | GLENDORA AVE   | 0.11  | NM           | General Urban Zone | Downtown | 20      |       | 1   |           | 1           |
| 8476011043 | GLENDORA AVE   | 0.20  | NM           | General Urban Zone | Downtown | 20      |       | 3   |           | 3           |
| 8476011039 | GLENDORA AVE   | 0.13  | NM           | General Urban Zone | Downtown | 20      |       | 2   |           | 2           |
| 8476022019 | GLENDORA AVE   | 0.61  | NM           | General Urban Zone | Downtown | 20      |       | 9   |           | 9           |
| 8476012020 | GLENDORA AVE   | 0.18  | NM           | General Urban Zone | Downtown | 20      |       | 2   |           | 2           |
| 8475007043 | GLENDORA AVE   | 0.65  | NM           | General Urban Zone | Downtown | 20      |       | 10  |           | 10          |
| 8476009043 | GLENDORA AVE   | 0.08  | NM           | General Urban Zone | Downtown | 20      |       | 1   |           | 1           |
| 8476009035 | GLENDORA AVE   | 0.11  | NM           | General Urban Zone | Downtown | 20      |       | 1   |           | 1           |
| 8476011038 | GLENDORA AVE   | 0.11  | NM           | General Urban Zone | Downtown | 20      |       | 1   |           | 1           |
| 8476022029 | GLENDORA AVE   | 0.45  | NM           | General Urban Zone | Downtown | 20      |       | 7   |           | 7           |
| 8468016904 | SUNSET AVE     | 1.00  | NM           | Urban Neighborhood | Downtown | 20      |       | 16  |           | 16          |
| 8468016904 | SUNSET AVE     | 0.40  | NM           | Urban Neighborhood | Downtown | 20      |       | 6   |           | 6           |
| 8451015045 | FAIRWAY LN     | 0.98  | NM           | S-C                |          | 20      |       | 15  |           | 15          |
| 8456019025 | VINCENT AVE    | 0.65  | NM           | N-C                |          | 20      |       | 10  |           | 10          |
| 8456019027 | VINCENT AVE    | 0.65  | NM           | N-C                |          | 20      |       | 10  |           | 10          |
| 8458003011 | SUNSET AVE     | 0.22  | NM           | N-C                |          | 20      |       | 3   |           | 3           |
| 8458003009 | PUENTE AVE     | 0.28  | NM           | N-C                |          | 20      |       | 4   |           | 4           |
| 8458003010 | SUNSET AVE     | 0.40  | NM           | N-C                |          | 20      |       | 6   |           | 6           |
| 8458018003 | SUNSET AVE     | 0.38  | NM           | N-C                |          | 20      |       | 6   |           | 6           |
| 8442018016 | AZUSA AVE      | 2.13  | NM           | S-C                |          | 20      |       | 34  |           | 34          |
| 8442018020 | AZUSA AVE      | 2.43  | NM           | N-C                |          | 20      |       | 38  |           | 38          |
| 8442018021 | AZUSA AVE      | 5.58  | NM           | N-C                |          | 20      |       | 89  |           | 89          |
| 8443017001 | AZUSA AVE      | 0.23  | NM           | S-C                |          | 20      |       | 3   |           | 3           |
| 8443017015 | DANES DR       | 0.23  | NM           | N-C                |          | 20      |       | 3   |           | 3           |
| 8443017016 | AZUSA AVE      | 0.23  | NM           | N-C                |          | 20      |       | 3   |           | 3           |
| 8443018020 | AZUSA AVE      | 0.21  | NM           | S-C                |          | 20      |       | 3   |           | 3           |
| 8443018019 | AZUSA AVE      | 0.18  | NM           | S-C                |          | 20      |       | 2   |           | 2           |
| 8443018018 | AZUSA AVE      | 0.43  | NM           | N-C                |          | 20      |       | 6   |           | 6           |
| 8443020033 | ECKERMAN AVE   | 0.22  | NM           | S-C                |          | 20      |       | 3   |           | 3           |

| APN        | Street Address | Acres | General Plan | Zoning | Downtown | Density | Lower | Mod | Above Mod | Total Units |
|------------|----------------|-------|--------------|--------|----------|---------|-------|-----|-----------|-------------|
| 8443020034 | AZUSA AVE      | 0.24  | NM           | S-C    |          | 20      |       | 3   |           | 3           |
| 8447019034 | GRAND AVE      | 3.54  | NM           | N-C    |          | 20      |       | 56  |           | 56          |
| 8468007043 | GARVEY AVE S   | 0.79  | NM           | N-C    |          | 20      |       | 12  |           | 12          |
| 8469005001 | MERCED AVE     | 0.28  | NM           | N-C    |          | 20      |       | 4   |           | 4           |
| 8469015002 | GLENDORA AVE   | 0.20  | NM           | O-P    |          | 20      |       | 3   |           | 3           |
| 8469015003 | GLENDORA AVE   | 0.20  | NM           | O-P    |          | 20      |       | 3   |           | 3           |
| 8469015001 | GLENDORA AVE   | 0.26  | NM           | O-P    |          | 20      |       | 4   |           | 4           |
| 8469015032 | GLENDORA AVE   | 0.17  | NM           | S-C    |          | 20      |       | 2   |           | 2           |
| 8469015024 | GLENDORA AVE   | 0.40  | NM           | N-C    |          | 20      |       | 6   |           | 6           |
| 8469015026 | CAMERON AVE    | 1.78  | NM           | S-C    |          | 20      |       | 28  |           | 28          |
| 8469015028 | GLENDORA AVE   | 1.94  | NM           | S-C    |          | 20      |       | 31  |           | 31          |
| 8469015027 | GLENDORA AVE   | 0.46  | NM           | N-C    |          | 20      |       | 7   |           | 7           |
| 8469015029 | GLENDORA AVE   | 0.47  | NM           | S-C    |          | 20      |       | 7   |           | 7           |
| 8469015035 | GLENDORA AVE   | 0.17  | NM           | S-C    |          | 20      |       | 2   |           | 2           |
| 8469015031 | GLENDORA AVE   | 0.17  | NM           | S-C    |          | 20      |       | 2   |           | 2           |
| 8469015034 | GLENDORA AVE   | 0.17  | NM           | S-C    |          | 20      |       | 2   |           | 2           |
| 8469015033 | GLENDORA AVE   | 0.17  | NM           | S-C    |          | 20      |       | 2   |           | 2           |
| 8469019001 | GLENDORA AVE   | 1.26  | NM           | O-P    |          | 20      |       | 20  |           | 20          |
| 8469020005 | GLENDORA AVE   | 0.35  | NM           | N-C    |          | 20      |       | 5   |           | 5           |
| 8469020001 | GLENDORA AVE   | 0.22  | NM           | N-C    |          | 20      |       | 3   |           | 3           |
| 8469020014 | GLENDORA AVE   | 0.21  | NM           | N-C    |          | 20      |       | 3   |           | 3           |
| 8469020011 | GLENDORA AVE   | 0.31  | NM           | N-C    |          | 20      |       | 4   |           | 4           |
| 8469020004 | GLENDORA AVE   | 0.26  | NM           | N-C    |          | 20      |       | 4   |           | 4           |
| 8469020019 | GLENDORA AVE   | 0.18  | NM           | N-C    |          | 20      |       | 2   |           | 2           |
| 8469020018 | GLENDORA AVE   | 0.49  | NM           | N-C    |          | 20      |       | 7   |           | 7           |
| 8469020021 | GLENDORA AVE   | 0.07  | NM           | N-C    |          | 20      |       | 1   |           | 1           |
| 8470032018 | GLENDORA AVE   | 0.51  | NM           | S-C    |          | 20      |       | 8   |           | 8           |
| 8470032017 | MERCED AVE     | 0.80  | NM           | O-P    |          | 20      |       | 12  |           | 12          |
| 8470032016 | MERCED AVE     | 0.30  | NM           | O-P    |          | 20      |       | 4   |           | 4           |
| 8475007038 | CHRISTOPHER ST | 0.72  | NM           | S-C    |          | 20      |       | 11  |           | 11          |
| 8475007041 | CHRISTOPHER ST | 0.70  | NM           | S-C    |          | 20      |       | 11  |           | 11          |
| 8475009018 | GLENDORA AVE   | 5.22  | NM           | S-C    |          | 20      |       | 83  |           | 83          |
| 8475009019 | SERVICE AVE    | 2.39  | NM           | S-C    |          | 20      |       | 38  |           | 38          |
| 8487017032 | VINE AVE       | 0.34  | NM           | N-C    |          | 20      |       | 5   |           | 5           |
| 8487017033 | VINE AVE       | 0.22  | NM           | N-C    |          | 20      |       | 3   |           | 3           |
| 8487017038 | GLENDORA AVE   | 0.83  | NM           | S-C    |          | 20      |       | 13  |           | 13          |
| 8487017040 | GLENDORA AVE   | 0.06  | NM           | S-C    |          | 20      |       | 0   |           | 0           |

| APN                              | Street Address | Acres | General Plan | Zoning | Downtown | Density | Lower        | Mod          | Above Mod | Total Units   |
|----------------------------------|----------------|-------|--------------|--------|----------|---------|--------------|--------------|-----------|---------------|
| 8487017041                       | VINE AVE       | 0.33  | NM           | N-C    |          | 20      |              | 5            |           | 5             |
| 8487017042                       | VINE AVE       | 0.31  | NM           | O-P    |          | 20      |              | 4            |           | 4             |
| 8488001008                       | MERCED AVE     | 0.21  | NM           | N-C    |          | 20      |              | 3            |           | 3             |
| 8488002007                       | GLENDORA AVE   | 0.17  | NM           | O-P    |          | 20      |              | 2            |           | 2             |
| 8488002006                       | GLENDORA AVE   | 0.16  | NM           | O-P    |          | 20      |              | 2            |           | 2             |
| 8488001002                       | WESCOVE PL     | 0.17  | NM           | O-P    |          | 20      |              | 2            |           | 2             |
| 8488001003                       | WESCOVE PL     | 0.17  | NM           | O-P    |          | 20      |              | 2            |           | 2             |
| 8488002001                       | VINE AVE       | 0.56  | NM           | N-C    |          | 20      |              | 8            |           | 8             |
| 8488001006                       | GLENDORA AVE   | 0.54  | NM           | N-C    |          | 20      |              | 8            |           | 8             |
| 8488001007                       | MERCED AVE     | 0.28  | NM           | N-C    |          | 20      |              | 4            |           | 4             |
| 8488002009                       | GLENDORA AVE   | 0.17  | NM           | O-P    |          | 20      |              | 2            |           | 2             |
| 8488002026                       | WESCOVE PL     | 0.54  | NM           | N-C    |          | 20      |              | 8            |           | 8             |
| 8488002004                       | GLENDORA AVE   | 0.17  | NM           | N-C    |          | 20      |              | 2            |           | 2             |
| 8488002024                       | GLENDORA AVE   | 0.29  | NM           | S-C    |          | 20      |              | 4            |           | 4             |
| 8488002003                       | GLENDORA AVE   | 0.19  | NM           | N-C    |          | 20      |              | 2            |           | 2             |
| 8488002005                       | GLENDORA AVE   | 0.17  | NM           | O-P    |          | 20      |              | 2            |           | 2             |
| 8488002010                       | GLENDORA AVE   | 0.16  | NM           | O-P    |          | 20      |              | 2            |           | 2             |
| 8488019022                       | MERCED AVE     | 0.56  | NM           | O-P    |          | 20      |              | 9            |           | 9             |
| 8488019030                       | GLENDORA AVE   | 0.43  | NM           | N-C    |          | 20      |              | 6            |           | 6             |
| 8488019031                       | GLENDORA AVE   | 0.97  | NM           | O-P    |          | 20      |              | 15           |           | 15            |
| 8487017043                       | GLENDORA AVE   | 0.17  | NM           | N-C    |          | 20      |              | 2            |           | 2             |
| 8476022030                       | GLENDORA AVE   | 0.79  | NM           | S-C    |          | 20      |              | 12           |           | 12            |
| 8443003018                       | AZUSA AVE      | 1.18  | NM           | S-C    |          | 20      |              | 18           |           | 18            |
| 8442018900                       |                | 8.77  | NM           | R-1    |          | 20      |              | 140          |           | 140           |
|                                  |                | 1.42  | NM           | R-1    |          | 20      |              | 22           |           | 22            |
| <b>Subtotal-Neighborhood MDR</b> |                |       |              |        |          |         | <b>43</b>    | <b>1,404</b> | <b>0</b>  | <b>1,447</b>  |
| <b>TOTALS</b>                    |                |       |              |        |          |         | <b>3,390</b> | <b>6,762</b> | <b>0</b>  | <b>10,152</b> |

# 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.

City residents and other interested parties were given several opportunities to identify housing issues of concern, recommend strategies, review the draft element, and provide recommendations to decision-makers. A Housing Element web page was established to provide interested persons with information including Frequently Asked Questions (provided below) and public meeting announcements. An online housing survey was also conducted (see results below).

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

|                  |                             |
|------------------|-----------------------------|
| May 20, 2021     | Public Workshop #1          |
| October 27, 2021 | Public Workshop #2          |
| _____            | Planning Commission hearing |
| _____            | City Council hearing        |

Meeting notices were posted on the City's website, and notification was 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 website, and notices were sent directly to housing interest groups and organizations that serve the City's special needs populations (see Table C-1). The public comments resulting from this broad effort to involve all segments of the community were considered by City decision-makers in preparing this Housing Element update.

Common themes raised during the update and how those comments are addressed in the Housing Element are summarized in Table C-2 below.

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**Table C-1 Housing Element Stakeholder Groups**

| <b>Organization</b>                                | <b>Address</b>                     | <b>City</b>      |
|--|------------------------------------|------------------|
| 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 5th 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 3rd Street, Suite 400     | Los Angeles      |
| California Housing Partnership Corporation         | 800 S. Figueroa Street, Suite 760  | Los Angeles      |
| Shelter Partnership                                | 523 W. 6th 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      |
| 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      |

**Table C-2 Summary of Public Comments**

| Comment   | Response   |
|---|--|
| 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.   |



## Frequently Asked Questions 2021 Housing Element Update

### 1. What is a Housing Element?

State law<sup>1</sup> 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 Plan<sup>2</sup> - 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 “5<sup>th</sup> 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”) region<sup>3</sup> is required to prepare a Housing Element update for the 6<sup>th</sup> planning cycle, which spans the 2021-2029 period, regardless of when the other elements of the General Plan were adopted.

State law<sup>4</sup> 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.*

<sup>1</sup> California Government Code Sec. 65300 *et seq.*

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

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

<sup>4</sup> 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 law<sup>5</sup> 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 law<sup>6</sup> 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)

<sup>5</sup> California Government Code Sec. 65583

<sup>6</sup> 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 law<sup>7</sup> 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.<sup>8</sup>

In 2019 HCD determined that the total new housing need for the entire SCAG region in the 6<sup>th</sup> 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.<sup>9</sup> 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. 6<sup>th</sup> 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

<sup>7</sup> California Government Code Sec. 65584 et seq.

<sup>8</sup> California Government Code Sec. 65584(d)

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

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

**Table 4. 6<sup>th</sup> 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.<sup>10</sup> 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 6<sup>th</sup> cycle is 1,341,827 units compared to 412,137 units in the 5<sup>th</sup> cycle. There are two main reasons why the region-wide 6<sup>th</sup> RHNA allocation is so much higher than the 5<sup>th</sup> cycle.

<sup>10</sup> California Government Code Sec. 65913.4 (SB 35 of 2017)

First, the 5<sup>th</sup> 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 5<sup>th</sup> RHNA was uncharacteristically low. For comparison, SCAG’s 4<sup>th</sup> cycle (2006-2013) RHNA allocation was approximately 700,000 units.

Second, for the 6<sup>th</sup> 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 6<sup>th</sup> 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 6<sup>th</sup> 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 6<sup>th</sup> 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.<sup>11</sup> 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”<sup>12</sup> 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.<sup>13</sup>
- **Eligibility for grant funds.** Some State grant funds are contingent upon Housing Element certification.

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<sup>11</sup> California Government Code Sec. 65585

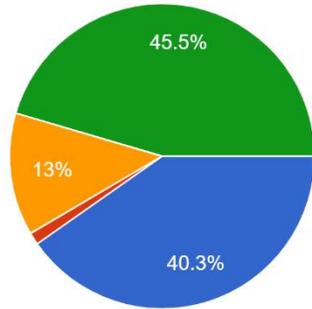
<sup>12</sup> California Government Code Sec. 65589.3.

<sup>13</sup> AB 101 of 2019

## Online Housing Survey Results

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

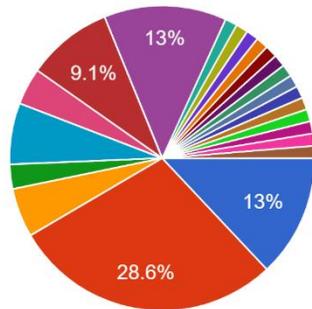
77 responses



- 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

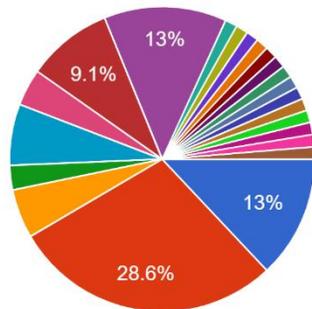


- I'm not aware of any significant housing problems
- Too many people can't find suitable housing
- More housing options are needed for...
- More houses and apartments with 4+ bedrooms
- More housing options with supportive services
- Fair housing
- Risk of foreclosure for homeowners
- Risk of eviction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

▲ 1/4 ▼

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

77 responses

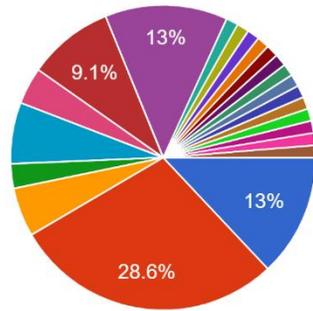


- Financial assistance with home repairs
- More small apartments or condos are needed
- More temporary housing is needed for...
- More housing is needed close to schools
- We don't need more housing. Financial issues are the problem
- Lack of leadership
- Homeless
- Homelessness, vocational, substance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

▲ 2/4 ▼

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

77 responses

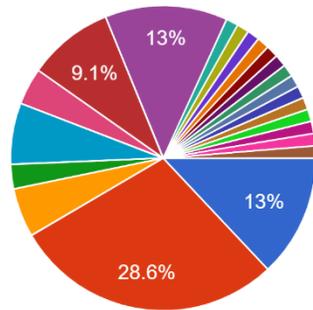


- Too many homeless people on streets
- Homeless people at parks and public...
- State legislation not allowing the City t...
- High Density Housing is destroying th...
- Stop all these illegal garage conversio...
- Safety/ homelessness issues need to...
- vocational , health and resource for di...
-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

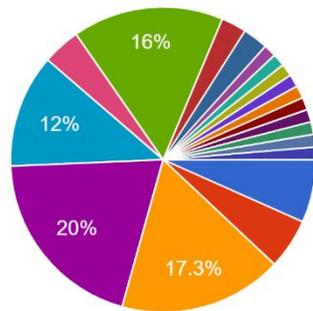


- Two: low & middle income housing is unavailable/unattainable; homeless need homes-public health concern

▲ 4/4 ▼

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

75 responses

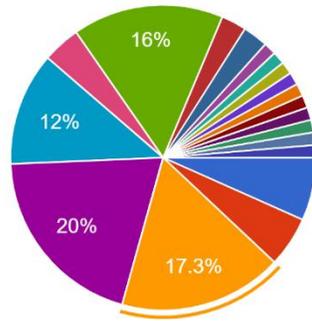


- Close to my workplace
- Housing quality
- Attractive neighborhoods
- Local recreational amenities
- Close to family and/or friends
- Good housing value
- Quality of local schools
- Neighborhood safety

▲ 1/3 ▼

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

75 responses

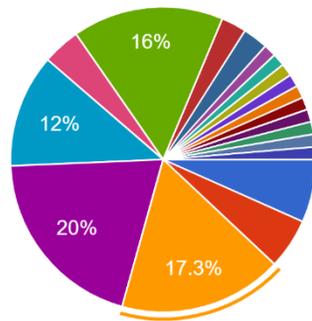


- City services, facilities and programs
- Proximity to shopping and services
- I came here to claim my piece of subu...
- Grew up here
- Long time resident when a great com...
- no choice
- I was raised in West Covina and later...
- I've lived here my entire life (45yrs)

▲ 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 ▼