



**CITY OF WEST COVINA**

**PLANNING COMMISSION**

**OCTOBER 11, 2022, 7:00 PM  
REGULAR MEETING**

**CITY HALL COUNCIL CHAMBERS  
1444 W. GARVEY AVENUE SOUTH  
WEST COVINA, CALIFORNIA 91790**

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

*Please turn off all cell phones and other electronic devices prior to entering the Council Chambers*

***AMERICANS WITH DISABILITIES ACT***

The City complies with the Americans with Disabilities Act (ADA). If you need special assistance at Planning Commission meetings, please call (626) 939-8433 (voice) or (626) 960-4422 (TTY) from 8 to 5 Monday through Thursday. Please call at least one day prior to the meeting date to inform us of your particular needs and to determine if accommodation is possible. For sign language interpreter services at Planning Commission meetings, please request no less than four working days prior to the meeting.

***PUBLIC COMMENTS/ADDRESSING THE COMMISSION***

Any person wishing to address the Planning Commission on any matter listed on the agenda or on any other matter within their jurisdiction is asked to complete a speaker card that is provided on the speaker podium and submit the card to a Planning Division staff member.

***Please identify on the speaker card whether you are speaking on an agenda item or non-agenda item.*** Requests to speak on non-agenda items will be heard during Oral Communications before the Public Hearing section of the agenda. Generally, comments are limited to five minutes per speaker unless further time is granted by the Chairperson. ***The Chairperson may also, at his or her discretion, further limit the time of each speaker in order to accommodate a large number of speakers and/or to ensure that the business of the Planning Commission is effectively conducted.***

Any testimony or comments regarding a matter set for Public Hearing will be heard during the public hearing for that item.

**MOMENT OF SILENT PRAYER/MEDITATION**

**PLEDGE OF ALLEGIANCE**

**ROLL CALL**

**APPROVAL OF MINUTES**

1. Regular meeting, September 13, 2022

## ORAL COMMUNICATIONS

This is the time when any member of the public may speak to the Commission on any matter within the scope of duties assigned to the Commission relating to non-agendized or consent calendar items. Other matters included on this agenda may be addressed when that item is under consideration. For all oral communications, the chairperson may impose reasonable limitations on public comments to assure an orderly and timely meeting. The Ralph M. Brown Act limits the Planning Commission and staff's ability to respond to public comments at this meeting. Thus, your comments may be agendized for a future meeting or referred to staff. The Commission may ask questions for clarification, if desired, at this time.

By policy of the Commission, Oral Communications at this time on the agenda is limited to a total of 15 minutes.

## CONSENT CALENDAR

*All matters listed under CONSENT CALENDAR are considered to be routine and can be acted on by one roll call vote. There will be no separate discussion of these items unless members of the Planning Commission request specific items to be removed from the Consent Calendar for separate discussion or action.*

## PUBLIC HEARINGS

2. **CONDITIONAL USE PERMIT NO. 22-02  
CATEGORICAL EXEMPTION**  
**APPLICANT:** Joseph Maltese for T-Mobile  
**LOCATION:** 625 E. Merced Avenue (Walmerado Park)  
**REQUEST:** The applicant is requesting to modify an existing unmanned 60-foot tall wireless telecommunications facility currently designed as a flag pole. The proposal includes the expansion of an existing canister to accommodate new antennas and remote radio units. The ground footprint will not increase in size. The project is located in Walmerado Park.
3. **PUBLIC HEARING TO CONSIDER CITY-WIDE GENERAL PLAN AMENDMENT NO. 22-02  
(2021-2029 HOUSING ELEMENT UPDATE)**
4. **CODE AMENDMENT NO. 22-04  
GENERAL EXEMPTION**  
**LOCATION:** City Wide  
**REQUEST:** The proposed code amendment consists of certain amendments to the Zoning section of the West Covina Municipal Code related to development standards and requirements for cart containment.

## NON-HEARING ITEMS

**TEN-DAY APPEAL PERIOD:** *Actions taken by the Planning Commission that are not recommendations to the City Council will become final after ten (10) calendar days unless a written appeal with the appropriate fee is lodged with the City Clerk's Office before close of business on the tenth day.*

## COMMISSION REPORTS/COMMENTS AND MISCELLANEOUS ITEMS

This is the time when any member of the Commission may bring a matter to the attention of the full Commission that is within the scope of duties assigned to the Commission. Any item that was considered during the Agenda is not appropriate for discussion in this section of the agenda. **NO COMMISSION DISCUSSION OR ACTION CAN BE CONSIDERED AT THIS TIME.** If the Commission desires to discuss an issue raised by a speaker or take an action, the Commission may vote to agendize the matter for a future meeting.

5. **COMMUNITY DEVELOPMENT DIRECTOR'S REPORT:**

6. **CITY COUNCIL ACTION:**

This is an oral presentation of City Council matters and actions, which are in the Commission's area of interest

**ADJOURNMENT**

**ITEM NO. 1.**

**DATE: October 11, 2022**

**TO:** Planning Commission  
**FROM:** Planning Division  
**SUBJECT:** Regular meeting, September 13, 2022

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**Attachments**

Minutes 9/13/22



# DRAFT

## MINUTES REGULAR MEETING OF THE PLANNING COMMISSION CITY OF WEST COVINA Tuesday, September 13, 2022

The regular meeting of the Planning Commission was called to order at 7:00 p.m. in the West Covina City Council Chambers, 1444 West Garvey Avenue, West Covina, California.

### MOMENT OF SILENT PRAYER/MEDITATION

The Commission observed a moment of silence.

### PLEDGE OF ALLEGIANCE

Commissioner Becerra led the Pledge of Allegiance

### ROLL CALL

Present: Lewis, Gutierrez, Williams, Heng, Becerra

City Staff Present: Bettenhausen, Morales, Burns, Machado

### APPROVAL OF MINUTES

1. Regular meeting, August 9, 2022 - The minutes were adopted as submitted.

### ORAL COMMUNICATIONS

This is the time when any member of the public may speak to the Commission on any matter within the scope of duties assigned to the Commission relating to non-agendized or consent calendar items. Other matters included on this agenda may be addressed when that item is under consideration. For all oral communications, the chairperson may impose reasonable limitations on public comments to assure an orderly and timely meeting. The Ralph M. Brown Act limits the Planning Commission and staff's ability to respond to public comments at this meeting. Thus, your comments may be agendized for a future meeting or referred to staff. The Commission may ask questions for clarification, if desired, at this time.

By policy of the Commission, Oral Communications at this time on the agenda is limited to a total of 15 minutes.

None

## **PUBLIC HEARINGS**

2. **TENTATIVE PARCEL MAP NO. 22-01 (83850)**  
**ADMINISTRATIVE USE PERMIT NO. 22-10**  
**SUBCOMMITTEE DESIGN REVIEW NO. 22-65**  
**CATEGORICAL EXEMPTION**

**APPLICANT:** Davie Sy

**LOCATION:** 2825 E. Cortez Street

**REQUEST:** The project consists of a subdivision of one 43,526 square foot property into two lots; Parcel 1 will be 24,941 square feet, and Parcel 2 will be 18,584 square feet. Parcel 1 has an existing 2,262 square foot single-story single-family residence, and Parcel 2 is proposing a new 3,148 square foot two-story single-family residence. The new proposed single-family residence requires an Administrative Use Permit and Subcommittee Design Review.

Associate Planner Miriam Machado presented the staff report.

There was a discussion by the Commission.

Chairman Lewis opened the public hearing.

### **PROPONENTS:**

None

### **OPPONENTS:**

Angie Gillingham spoke regarding privacy concerns.

### **REBUTTAL:**

Peter Wang, applicant, spoke in rebuttal to the opponent's testimony and answered questions by the Commission.

Chairman Lewis closed the public hearing.

Discussion by the Commission.

Motion by Gutierrez, seconded by Becerra, to waive further reading and adopt Resolution No. 22-6111, approving Tentative Parcel Map No. 22-01 (83850) as amended. Motion carried 4-1, Lewis opposed.

Motion by Gutierrez, seconded by Becerra, to waive further reading and adopt Resolution No. 22-6112, approving Administrative Use Permit No. 22-10. Motion carried 4-1, Lewis opposed.

Chairman Lewis stated this action is final unless appealed to the City Council within ten days.

3. **CODE AMENDMENT NO. 22-03**  
**ZONE CHANGE NO. 22-02**  
**GENERAL EXEMPTION**

**REQUEST:**The proposed code amendment consists of potential amendments to Chapter 26 (Zoning), Article X (Nonresidential Zones), Article XIII (Overlay Zone), and Section 26-597 of the West Covina Municipal Code pertaining to the creation of a Mixed-Use Overlay Zone consisting of underutilized properties with a Commerce & General Plan land-use designation and applicable development and objective design standards. The City's General Plan allows for residential development within the Commerce land-use designation. The proposed code amendment would provide a means to create the mixed-use residential and commercial development within the same parcel intended by the General Plan.

Planning Manager Jo-Anne Burns presented the staff report.

Discussion by the Commission.

Chairman Lewis opened the public hearing.

John Moreland, representing KTGy, spoke regarding Code Amendment No. 22-03 and Zone Change No. 22-02.

**PROPONENTS:**

Angie Gillingham spoke regarding this matter.

**OPPONENTS:**

No one spoke in opposition.

Chairman Lewis closed the public hearing.

There was a discussion by the Commission.

Motion by Gutierrez, to bring this matter back to the Commission at the next scheduled meeting.

Motion died for lack of a second.

Further discussion by the Commission.

Motion by Lewis, seconded by Williams, to waive further reading and adopt Resolution No. 22-6114, recommending to the City Council approval of Code Amendment No. 22-03, Code Amendment related to the Mixed-Use Overlay Zone standards. Motion carried 4-1 (Gutierrez abstained).

Motion by Lewis, seconded by Williams, seconded by Williams, to waive further reading and adopt Resolution No. 22-6115, adopting the Multi-Family Objective Design Standards. Motion carried 4-1 (Gutierrez abstained.)

Chairman Lewis said final action on this matter will be taken by the City Council at a public hearing on a date to be determined.

**NON-HEARING ITEMS - None**

**TEN-DAY APPEAL PERIOD:** *Actions taken by the Planning Commission that are not recommendations to the City Council will become final after ten (10) calendar days unless a written appeal with the appropriate fee is lodged with the City Clerk's Office before close of business on the tenth day.*

## **COMMISSION REPORTS/COMMENTS AND MISCELLANEOUS ITEMS**

This is the time when any member of the Commission may bring a matter to the attention of the full Commission that is within the scope of duties assigned to the Commission. Any item that was considered during the Agenda is not appropriate for discussion in this section of the agenda. **NO COMMISSION DISCUSSION OR ACTION CAN BE CONSIDERED AT THIS TIME.** If the Commission desires to discuss an issue raised by a speaker or take an action, the Commission may vote to agendize the matter for a future meeting.

None

### **4. COMMUNITY DEVELOPMENT DIRECTOR'S REPORT:**

- a. Forthcoming - September 13, 2022
- b. State of the City Address, September 15, 2022. Tickets are available at [westcovina.org](http://westcovina.org).
- c. Housing Element - Scheduled for public hearing, Planning Commission meeting October 11, 2022

### **5. CITY COUNCIL ACTION:**

This is an oral presentation of City Council matters and actions, which are in the Commission's area of interest

## **ADJOURNMENT**

Chairman Lewis adjourned the meeting at 9:12 p.m.

Respectfully submitted:

Lydia de Zara  
Senior Administrative Assistant

**PLANNING DEPARTMENT STAFF REPORT**

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**SUBJECT**

**CONDITIONAL USE PERMIT NO. 22-02**

**CATEGORICAL EXEMPTION**

**APPLICANT:** Joseph Maltese for T-Mobile

**LOCATION:** 625 E. Merced Avenue (Walmerado Park)

**REQUEST:** The applicant is requesting to modify an existing unmanned 60-foot tall wireless telecommunications facility currently designed as a flag pole. The proposal includes the expansion of an existing canister to accommodate new antennas and remote radio units. The ground footprint will not increase in size. The project is located in Walmerado Park.

**BACKGROUND**

The applicant is requesting approval of a Conditional Use Permit (CUP) for the modification of an existing wireless telecommunications facility. The subject property is in the Open Space Zone, and is located along E. Merced Avenue, northeast of its intersection with S. Walnut Avenue, in Walmerado Park.

On September 12, 2006, the Planning Commission approved CUP No. 06-16 and Variance No. 06-19, allowing the installation of an unmanned 60-foot tall wireless telecommunications facility to be designed as a flag pole located in Walmerado Park.

ITEM	DESCRIPTION
ZONING & GENERAL PLAN	Zoning: Open Space (O-S) General Plan: Parks and Open Space
SURROUNDING LAND USES	<b>North:</b> Residential Single Family (R-1), Civic: Schools <b>South:</b> Residential Single Family (R-1), Residential Agriculture (R-A) <b>East:</b> Residential Single Family (R-1) <b>West:</b> Residential Single Family (R-1), Residential Agriculture (R-A)
CURRENT DEVELOPMENT	Open Space (O-S), Walmerado Park
LEGAL NOTICE	Public Hearing Notices were mailed out to 93 owners and/or occupants of properties within a 300-foot radius of the subject site. In addition, the Public Hearing Notice was published in the San Gabriel Valley Tribune at least 10 days prior to tonight's meeting.

**DISCUSSION**

The proposal consists of a CUP to allow for the modification of the existing wireless telecommunication facility (flag pole) that services one carrier (T-Mobile). A CUP is required due to the proposed change in the means of concealment of the existing flag pole. The modifications will include the expansion of the existing canister from 1 foot 6 inches, to 4 feet in width to accommodate 3 new antennas and 6 remote radio units. The dimensions of the new antennas and remote radio units have increased in size, resulting in the need for a wider canister. The flag pole will remain 60 feet in height. All existing and proposed equipment cabinets will remain in the same screened enclosure on site.

An additional carrier would not be able to co-locate at this facility due to the limited spacing on the flag pole.

#### Wireless Facility Location

The Zoning Code requires that freestanding wireless telecommunications facilities be located a minimum of one-half mile (2,640 feet) away from any other freestanding wireless telecommunication facility. The nearest existing wireless telecommunications facility is located within the same subject site (Walmerado Park) and is approximately 145 feet away from the existing flag pole. Both wireless telecommunication facilities do not comply with the current Zoning Code, as they were permitted through a Variance to deviate from the one-half mile distance required between facilities approved on September 12, 2006.

#### Separation from Residential Uses

The subject site is surrounded by residential properties on three sides with a school (Walnut Grove Intermediate School) to the north. The park is 5.53 acres and is on the northeast corner of E. Merced Avenue and S. Walnut Avenue. The subject site can be accessed off of E. Merced Avenue and S. Walnut Avenue. The existing wireless telecommunications facility is located approximately 120 feet from the southerly property line (E. Merced Avenue), 300 feet from the westerly property line (S. Walnut Avenue) and 315 feet from the easterly property line (single-family housing). The Zoning Code requires that wireless telecommunication facilities be at least 100 feet away from residential uses. Therefore, the wireless telecommunications facility is in compliance with the current Municipal Code separation requirement.

#### Wireless Facility Design

Staff has notified the applicant in writing that the proposed increase in canister width defeats the means of concealment and would no longer provide the required stealthing. Therefore, should be redesigned. The applicant has chosen to proceed with the Planning Commission hearing with the design as originally proposed.

The primary focus on any flag pole should be the flag that is being displayed. The increase in width defeats the means of concealment and is no longer considered stealth because the width of the shroud detracts from the visual display of the American flag. The flag appears out of scale and diminished in size due to the proposed 4-foot wide shroud. In addition, the presence of another flag pole on the same park that is markedly dissimilar and significantly narrower than the proposed flag pole design would make the telecommunication antenna appear to be more prominent.

In staff's opinion, an alternative design such as a faux tree to blend with other trees on the park, a small clock-tower, or a unique public art design will provide the necessary stealthing and will serve the park better. As the property owner, the City has not approved the proposed flag pole design.

### **REQUIRED FINDINGS**

Before an application for a conditional use permit can be made, the following findings shall be made:

- a. That such use will not, under the circumstances of the particular case, be detrimental to the health, safety, peace or general welfare or persons residing or working in the vicinity or injurious to property or improvements in the vicinity.
- b. That the site for the proposed use is adequate in size and is so shaped as to accommodate said use, as well as, all yards, spaces, walls, fences, parking, loading, landscaping, and any other features necessary to adjust such use with the land and uses in the neighborhood and make it compatible thereto.
- c. That the site abuts streets and highways adequate in width and improvements to carry traffic generations typical of the proposed uses and the street patterns of such a nature exist as to guarantee that such generation will not be channeled through residential areas on local residential streets.

d. That the granting of such conditional use permit will not adversely affect the General Plan of the City, or any other adopted plan of the City.

e. The facility structures and equipment are located, designed and screened to blend with the existing natural environment or built surroundings to reduce visual impacts to the extent feasible considering the technological requirements of the proposed telecommunications service and the need to be compatible with neighboring residents and the character of the community.

f. The facility is designed to blend with any existing supporting structures and does not substantially alter the character of the structure or local area.

As proposed, staff is not able to make the Findings and because the increase in width of the shroud detracts from the visual display of the American flag and the proposed flag pole design would not blend in with the environment and other structures on the site. The project was not designed to reduce visual impacts.

### **ENVIRONMENTAL DETERMINATION**

Pursuant to the California Environmental Quality Act (CEQA), the proposed project is considered to be categorically exempt, pursuant to Section 15303 (Class 1, Existing Facilities) in that it consists of minor alterations of the existing structure in order to operate the requested use.

### **STAFF RECOMMENDATIONS**

Staff recommends that the Planning Commission continue the item with direction to the applicant to redesign the proposed wireless telecommunications facility as a faux tree, or other structure to fit the existing landscaping of Walmerado Park.

### **LARGE ATTACHMENTS**

Plans may be viewed at the West Covina City Hall Planning Division Counter at 1444 W. Garvey Avenue South, 2nd Floor - Room 208, West Covina CA 91790.

**Submitted by:** Miriam Machado, Associate Planner

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**PLANNING DEPARTMENT STAFF REPORT**

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**SUBJECT**

**PUBLIC HEARING TO CONSIDER CITY-WIDE GENERAL PLAN AMENDMENT NO. 22-02  
(2021-2029 HOUSING ELEMENT UPDATE)**

**DESCRIPTION OF APPLICATION**

The proposed General Plan Amendment consists of a comprehensive update of the Housing Element of the West Covina General Plan for the 2021-2029 planning period. The Housing Element includes analysis of the community's housing needs, opportunities and constraints, as well as policies and programs to facilitate the construction, rehabilitation, and preservation of housing for all economic segments of the community.

**BACKGROUND**

The [International City/County Management Association](#) defines development planning as the process by which citizens and local government officials identify and seek to achieve a desirable future for their community. The development planning process has two principal outcomes: the first is public understanding of - and consensus on pursuing - the community's vision for future growth; the second is a land use plan that 1) translates the vision into a physical pattern of neighborhoods, commercial and industrial areas, roads, and public facilities, and 2) includes the policies and regulation necessary for plan implementation. Common elements of community development planning include an orientation toward the future, the deliberate management of change, a broadly collaborative process, and a balancing of competing interests.

California State law requires that all cities in the Southern California Association of Governments ([SCAG](#)) region prepare an update to the Housing Element of the City General Plan for the 2021-2029 planning period. The City of West Covina commenced preparation of the Housing Element update in 2020 and previous public meetings were held on May 20, 2021, October 27, 2021, February 8, 2022 and March 1, 2022 regarding the Housing Element. City staff reports and related materials from these previous meetings are available on the City's Housing Element website at: [Housing Element](#)

California State requirements for Housing Elements are much more detailed than for any other element of the General Plan. One of those requirements is that cities must submit Housing Elements to the California Department of Housing and Community Development ( [HCD](#) ) for review, and HCD's comments must be considered when adopting a Housing Element update. The City's draft Housing Element incorporating public comments was prepared and submitted to HCD in November 2021. On January 14, 2022 HCD issued a letter (Attachment 2) stating that the draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law.

**DISCUSSION**

**Overview**

California State law sets forth extensive requirements for Housing Elements and land use regulations related to housing, and many new housing laws have been adopted by the State Legislature in recent years. Over the past several months the City has been working to prepare a revised Housing Element that fully addresses HCD's comments. The purpose of this meeting is to provide an opportunity for the Planning Commission and interested parties to review the revised draft Housing Element and consider



recommending its adoption by the City Council. The draft Housing Element for the 2021-2029 planning cycle includes the following sections:

- An Introduction providing background information and context for the Housing Element (Section 1)
- The Housing Plan describing policies and programs for the 2021-2029 planning period (Section 2)
- An analysis of the city's demographic and housing characteristics and trends (Section 3)
- A review of potential constraints to meeting housing needs (Section 4)
- An evaluation of resources and opportunities available to address housing issues (Section 5)
- A review of accomplishments during the previous planning period (Appendix A)
- An inventory of the potential sites for housing development (Appendix B)
- A summary of public participation during the preparation of this Housing Element (Appendix C)
- An assessment of fair housing issues (Appendix D)

### **Housing Element Requirements**

Two of the most important issues that must be addressed in the Housing Element update are:

- 1) how City land use regulations address the special housing needs of those with disabilities or other housing difficulties
- 2) how City policies, plans and regulations create sufficient opportunities for housing development to accommodate the City's assigned share of the region's need for additional housing at all income levels as determined through the Regional Housing Needs Assessment (RHNA) process.

### ***Housing for Persons with Special Needs***

Under State law cities must ensure that their plans and regulations facilitate the provision of housing for persons with special needs such as disabilities or homelessness. There are many specific requirements set forth in State law relating to City housing regulations, and the Constraints chapter of the Housing Element includes a detailed analysis of those requirements. Changes to City regulations needed to ensure conformance with current State law are discussed below.

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

Under State law all cities are required to plan for additional housing to accommodate population growth and address existing housing problems such as overcrowding and housing cost burden. State law recognizes that cities generally do not build housing, since that is typically the role of the private sector. However, cities are required to adopt policies, development regulations and standards to encourage a variety of housing types to accommodate households at all income levels. The RHNA is the process by which each jurisdiction's share of new housing needs is determined.

In late 2019 HCD issued a RHNA determination of 1,341,827 additional housing units for the SCAG region during the 2021-2029 period. Following HCD's RHNA determination, SCAG prepared a methodology for allocating a portion of the total RHNA to each jurisdiction in the region consistent with criteria established in State law, and after a series of public hearings SCAG adopted the final RHNA Plan on March 4, 2021. West Covina's assigned RHNA allocation for the 2021-2029 period is 5,346 units distributed among income categories as follows:

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

The Housing Element must demonstrate through a parcel-specific analysis that the City's land use plans and regulations provide sufficient opportunities for additional housing to fully accommodate the housing needs allocated in the RHNA. Appendix B of the Housing Element contains a detailed analysis of the potential for additional housing development. The analysis shows that there is adequate capacity for additional housing to fully accommodate the City's RHNA allocation. Most of the capacity for additional housing is provided in the Downtown Plan area and in the new Mixed Use Overlay Zone that was reviewed by the Planning Commission on September 13th. If adopted by the City Council, the Mixed Use Overlay will update zoning regulations to ensure consistency with the General Plan by allowing a blend of residential and non-residential development in several

zones where housing is not currently permitted. The MUO area provides significant new opportunities for residential development to help address RHNA requirements.

In addition to traditional housing development, future accessory dwelling units (ADUs) also satisfy a portion of the RHNA requirements. The City has recently seen a significant increase in ADU construction, and according to recent SCAG analysis, approximately 70% of ADUs recently built in Los Angeles County qualified as affordable housing.

It is important to note that the RHNA allocation is a planning requirement based upon housing need, not a construction quota or mandate, nor a prediction of how much additional housing is expected to be built during the next 8 years. The significance of the RHNA is that jurisdictions must adopt land use plans and development regulations that could accommodate different types of housing commensurate with the RHNA allocation. Under current law, cities are not penalized if actual housing production does not achieve the RHNA allocation, but some provisions of State law require cities to streamline the review and approval process for qualifying housing developments that meet specific standards (such as affordability and prevailing wage labor requirements) if housing production falls short of the RHNA allocation.

### **HCD Review**

The State legislature has delegated authority to HCD to review Housing Elements and issue opinions regarding their compliance with State law. A finding of substantial compliance by HCD is referred to as Housing Element certification and is important to enhance cities eligibility for grant funds and to support the validity of the General Plan in the event of a legal challenge.

After reviewing the City's draft Housing Element, HCD issued a letter on January 14, 2022 (Attachment 2) describing changes to the draft Housing Element that will be required in order to fully comply with State law. Attachment 3 provides a summary of HCD's comments and how the Housing Element has been revised to address those comments.

While many of HCD's comments have been addressed by providing additional technical data and analysis in the Housing Element, some comments require substantive changes to housing policies, programs or regulations as discussed below.

### ***Proposed changes to current City policies and regulations to ensure conformance with State law***

The following programs are included in the draft Housing Element to address recent changes to State law and HCD comments.

- Program 3.1 (Reduce Development Constraints) includes a commitment to amend the Development Code to address State requirements regarding the following special housing needs:
  - Emergency shelters & AB 139 (2019) limited the allowable parking standards for emergency shelters to the number of spaces required for staff.
  - 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.
  - Residential care facilities & As part of the Development Code update a definition and regulations will be established for residential care facilities for seven or more people consistent with State law and fair housing requirements, including replacing or modifying the CUP requirement to provide greater objectivity and certainty to expand housing opportunities for persons with disabilities.
  - Agricultural employee housing - The Employee Housing Act (Health and Safety Code,

§17021.5 and §17021.6) requires agricultural employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone, and requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone.

- Affirmatively furthering fair housing. AFFH is a new requirement for the 6th Housing Element cycle, and extensive additional analysis of fair housing issues is provided in Appendix D. To address HCD comments, Program 5.1 has also been expanded to describe additional actions the City will take to affirmatively further fair housing.

### **Conclusion**

The revised draft Housing Element is provided as Exhibit A to the Planning Commission Resolution (Attachment 1). Proposed revisions to the Housing Element made in response to HCD comments are shown in strike out/underline and is posted on the City website. It is staff's opinion that with the proposed revisions, the draft Housing Element fully addresses HCD's comments and substantially complies with the requirements of State law. Programs calling for revisions to current regulations will require subsequent review and public hearings by the Planning Commission and City Council prior to approval.

### **ENVIRONMENTAL DETERMINATION**

The Housing Element is exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3) of the CEQA Guidelines in that it would not approve any development project or other physical change; therefore, the Housing Element does not have the potential for causing a significant effect on the environment. Subsequent housing development projects will be reviewed for compliance with CEQA.

### **STAFF RECOMMENDATIONS**

Staff recommends that the Planning Commission adopt Resolution No. 22-6115, recommending that the City Council adopt a resolution adopting General Plan Amendment No. 22-02 for the 2021-2029 Housing Element update.

**Submitted by:** Jo-Anne Burns, Planning Manager

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### **Attachments**

Attachment No. 1 - Resolution Recommending Adoption of General Plan Amendment No. 22-02

Attachment No. 2 - HCD Letter

Attachment No. 3 - HCD Comments and Responses

**P L A N N I N G   C O M M I S S I O N**

**R E S O L U T I O N   N O . 22-6115**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST COVINA, CALIFORNIA, RECOMMENDING THAT THE CITY COUNCIL OF THE CITY OF WEST COVINA APPROVE GENERAL PLAN AMENDMENT (GPA) NO. 22-02 FOR THE 2021-2029 HOUSING ELEMENT UPDATE**

**WHEREAS**, local governments are authorized by Government Code section 65350 et seq. to prepare, adopt and amend general plans; and

**WHEREAS**, Government Code Section 65580 et seq. requires cities to update their Housing Elements on a regular basis; and

**WHEREAS**, an update to the Housing Element of the West Covina General Plan for the 2021-2029 planning period has been initiated and prepared by the City of West Covina; and

**WHEREAS**, the staff report and supporting materials accompanying this resolution are found to be true, are adopted as Facts and Findings, and are incorporated by reference in this resolution; and

**WHEREAS**, pursuant to State Law, the draft 2021-2029 Housing Element Update was submitted to the California Department of Housing and Community Development (“HCD”); and

**WHEREAS**, on January 14, 2022 HCD issued a letter finding that the draft 2021-2029 Housing Element addressed many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law; and

**WHEREAS**, revisions to the draft 2021-2029 Housing Element have been made to address the issues raised in HCD’s January 14, 2022 review letter, as summarized in the Planning Commission staff report; and

**WHEREAS**, based on the factors and substantial evidence described in Appendix B of the Housing Element, incorporated herein by reference, the existing uses on sites identified to accommodate the lower-income RHNA allocation are likely to be discontinued during the planning period and therefore do not constitute an impediment to additional residential development during the period covered by the Housing Element; and

**WHEREAS**, the 2021-2029 Housing Element Update was reviewed and found to be exempt from further review under the California Environmental Quality Act (“CEQA”), as more fully described below; and

**WHEREAS**, on October 11, 2022 the Planning Commission of the City of West Covina held a duly noticed public hearing at which time all persons wishing to testify in connection with the application were heard and the application was fully examined; and

**WHEREAS**, all legal prerequisites prior to adoption of this Resolution have occurred.

**NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF WEST COVINA DOES HEREBY RESOLVE AS FOLLOWS:**

**SECTION 1.** The Planning Commission finds that the proposed General Plan Amendment, as set forth in Exhibit “A” to this Resolution, is exempt from the requirements of CEQA pursuant to CEQA Guidelines (14 Cal. Code Regs. § 15000 *et seq.*) Section 15061(b)(3) because no development project or other physical change to the environment would be approved by the adoption of the Housing Element. The Planning Commission has reviewed the City staff determination of exemption, and based on its own independent judgment, concurs in staff’s determination that the proposed General Plan Amendment is exempt from CEQA.

**SECTION 2.** Based on the entire record before the Planning Commission of the City of West Covina, all written and oral evidence presented has been considered and reviewed, and the Planning Commission finds that the 2021-2029 Housing Element Amendment, as revised as shown in Exhibit “A” to this Resolution, incorporates changes that fully address the January 14, 2022 comments from HCD in compliance with State law. The Planning Commission further finds that the 2021-2029 Housing Element will promote the public health, safety and welfare, and will leave the General Plan an integrated and internally consistent statement of policies.

**SECTION 3.** After giving full consideration to all evidence presented at the public hearing, and in consideration of the findings stated above, the Planning Commission of the City of West Covina does hereby recommend that the City Council approve the 2021-2029 Housing Element update as set forth in Exhibit “A” attached hereto.

**SECTION 4:** The Secretary is instructed to forward a copy of this Resolution to the City Council for their attention in the manner as prescribed by law and this Resolution shall go into force and effect upon its adoption.

I HEREBY CERTIFY, that the foregoing Resolution was adopted by the Planning Commission of the City of West Covina, at a regular meeting held on the 11th day of October, 2022, by the following vote.

AYES:

NOES:

ABSTAIN:

ABSENT:

DATE:

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Nickolas Lewis, Chairman  
Planning Commission

---

Paulina Morales, Secretary  
Planning Commission

**Exhibit “A”**

**West Covina 2021-2029 Housing Element**

# City of West Covina



## 2021-2029 Housing Element

Revised Draft | October 2022





# City of West Covina

2021-2029 Housing Element

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

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

# Acknowledgements

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## **City Council**

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

## **Planning Commission**

Nickolas Lewis, Chair  
Brian Gutierrez, Vice Chair  
Livier Becerra, Commissioner  
Sheena Heng, Commissioner  
Shelby Williams, 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. Specific actions the City will take to facilitate the preservation of these at-risk units include:

- Monitor the Risk Assessment report published by the California Housing Partnership Corporation annually.
- Maintain regular contact at least once each year with the local HUD office regarding early warnings of possible opt-outs.
- Maintain contact with the owners and managers of existing affordable housing at least once each year to determine if there are plans to opt out in the future, and offer assistance in locating eligible buyers.
- Develop and maintain a list of potential purchasers of at-risk units and act as a liaison between owners and eligible purchasers.
- Ensure that all owners and managers of affordable housing are provided with applicable state and federal laws regarding notice to tenants of the owner's desire to opt out or prepay.

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

**Time Frame:** Annual outreach; Ongoing, 2021-2029

**Potential Funding Sources:** General Fund

**Objectives:**

- Preserve all 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. The City will proactively explore and pursue funding opportunities from all sources annually in partnership with nonprofit developers and service providers.

**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 proactively explore and pursue funding opportunities from all sources in partnership with nonprofit developers and service providers.

### **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 proactively cooperate with the Los Angeles County Development Authority (LACDA) each year 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:

- Emergency shelters – AB 139 (2019) limited the allowable parking standards for emergency shelters to the number of spaces required for staff.
- 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.
- Residential care facilities – As part of the Development Code update a definition and regulations will be established for residential care facilities for seven or more people consistent with State law and fair housing requirements, including replacing or modifying the CUP requirement to provide greater objectivity and certainty to expand housing opportunities for persons with disabilities.
- Agricultural employee housing - The Employee Housing Act (Health and Safety Code, §17021.5 and §17021.6) requires agricultural employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone, and requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone.



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

**Time Frame:** Development Code amendment by December 2022

**Potential Funding Source:** Grant funds

**Objectives:**

- Process amendments to the Development Code to update City regulations for emergency shelters, supportive housing, low barrier navigation centers, residential care facilities for seven or more persons, and agricultural employee housing 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 2022/23

**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.

The City will proactively reach out to affordable and special needs housing developers annually to encourage and facilitate housing development in West Covina.



Under some circumstances development applications may be eligible for “streamlined ministerial review” such as pursuant to SB 35 (Government Code §65913.4). Qualifying projects are subject to specified procedures and development standards intended to simplify and expedite the development process. As part of the comprehensive Development Code update the City will establish written guidelines to assist applicants and City staff in complying with these requirements.

In compliance with transparency requirements, all zoning, development standards and fees will be posted on the City website and other public places.

**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.
- Reach out to affordable and special needs housing developers annually
- Provide informational materials about development regulations, fees and fast-track processing, including SB 35 streamlined review, 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, caregivers, or young adults. ADUs can also provide property owners with an additional source of income. Recent changes to State law encourage ADU production. The City amended local ADU regulations in October 2020 and July 2022 in conformance with State law. The City has addressed the Department of Housing and Community Development's February 2022 ADU Ordinance comment letter and has made applicable revisions to the ADU regulations. The City will continue to monitor legislation and update City ADU regulations as necessary to ensure consistency with State law.

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

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

- Responsible Agency:** West Covina Community Development Department, Planning Division
- Time Frame:** Review and update ADU regulations annually as necessary to incorporate changes to State law; Encourage ADU production 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 §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 affirmatively further fair housing through the following meaningful actions: contract with the Housing Rights Center to provide residents with fair housing services using Community Development Block Grant (CDBG) funds. Fair housing services provided by the Housing Rights Center include counseling and mediation between tenants and landlords. The Housing Rights Center also conducts seminars and information activities throughout the region. The City will refer fair housing complaints to the Housing Rights Center 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.

- Continue directing fair housing inquiries to the Housing Rights Center.
- Continue to support the provision of housing for persons with disabilities through reasonable accommodation and zoning regulations that encourage and facilitate housing for persons with special needs.
- Post information at the Senior Center regarding fair housing and conduct a presentation every two years at the Center about services available through the County CDC, Housing Rights Center and the City.
- In cooperation with the Housing Rights Center, contact low-income apartment complexes to provide education and materials about the Section 8 program including multi-lingual materials.
- Publish links to fair housing information via social media.
- Conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

**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 §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. As part of the comprehensive Development Code update, the City's reasonable accommodation procedures will be revised as necessary to ensure compliance with fair housing law.

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

**Time Frame:** Code amendment by December 2022; 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 special needs housing 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.

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

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

**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.
- Require replacement of lower-income units displaced due to redevelopment

## **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 §54222. Land sold for affordable housing shall be required to provide 25% 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

# 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

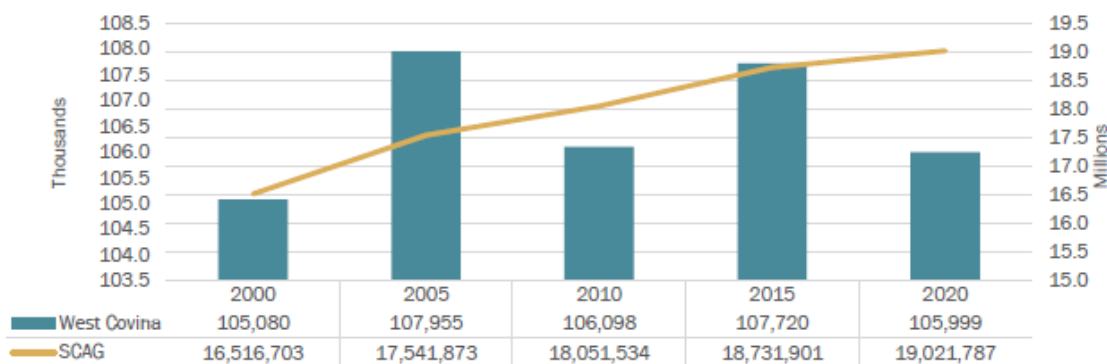
The primary data sources used for the Needs Assessment include the U.S. Census and American Community Survey (ACS), the federal Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), California Department of Finance, and the Southern California Association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

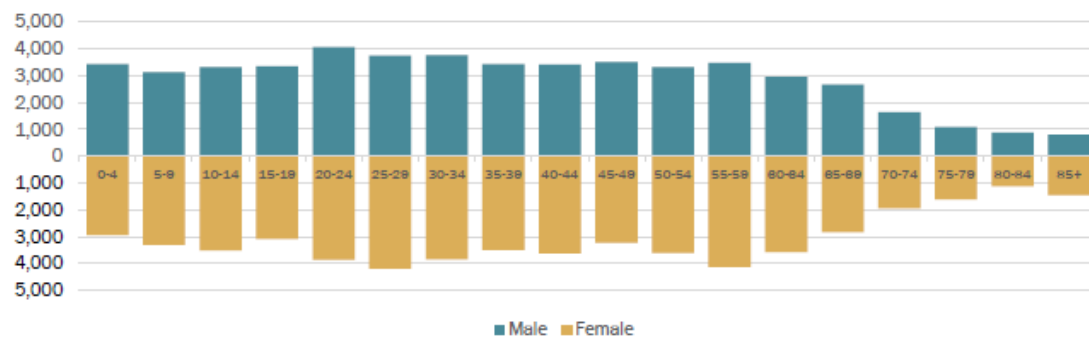
### 3.3.2 Age Composition

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**

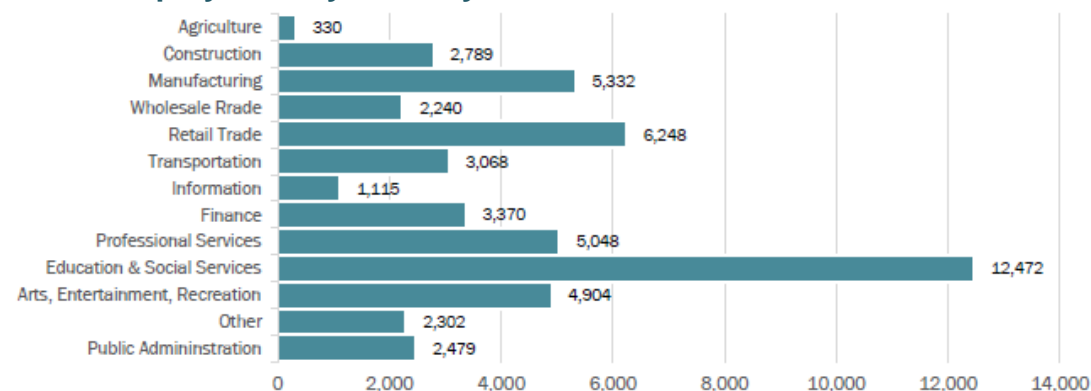


American Community Survey 2014-2018 5-year estimates

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

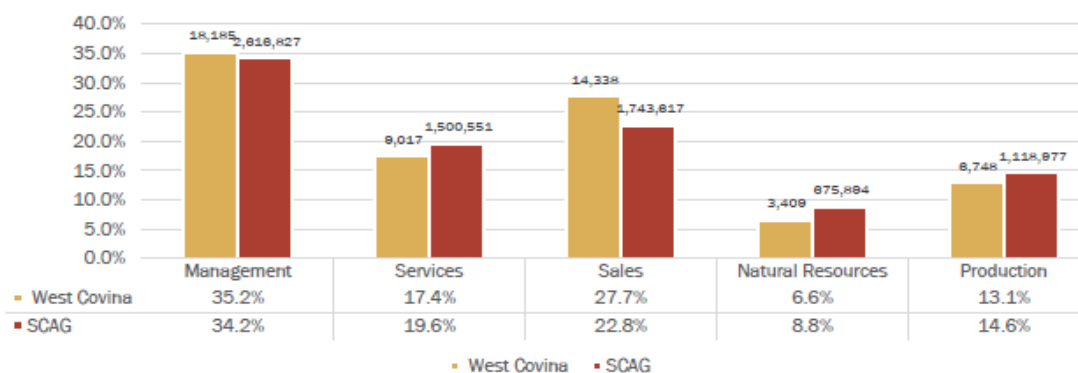
**Figure 3-3 Employment by Industry – West Covina**



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

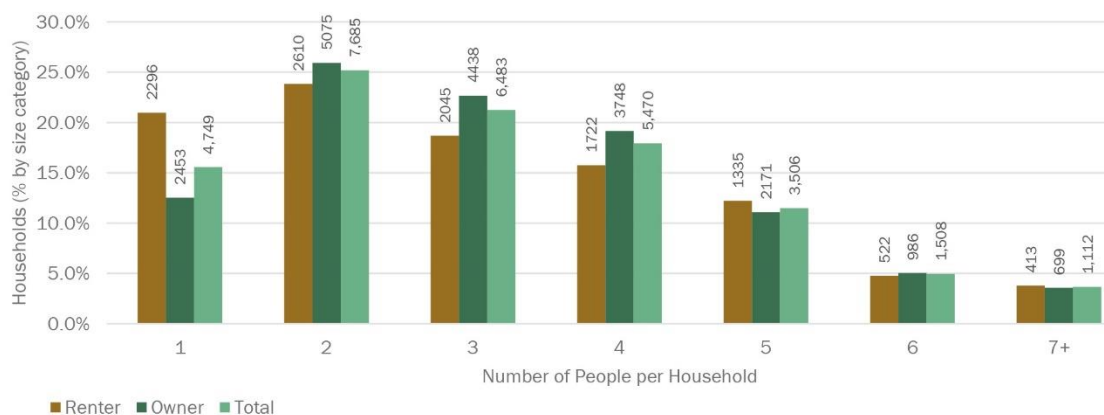
Before current housing problems can be understood and future needs anticipated, housing occupancy characteristics need to be identified in the City. The following is an analysis of household types and sizes, and other household characteristics that may affect housing needs.

### 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.

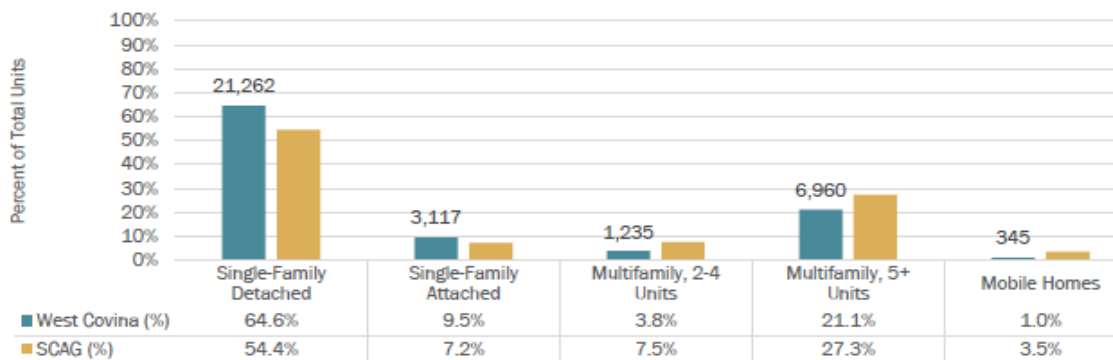
## 3.5 Housing Inventory and Market Conditions

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**

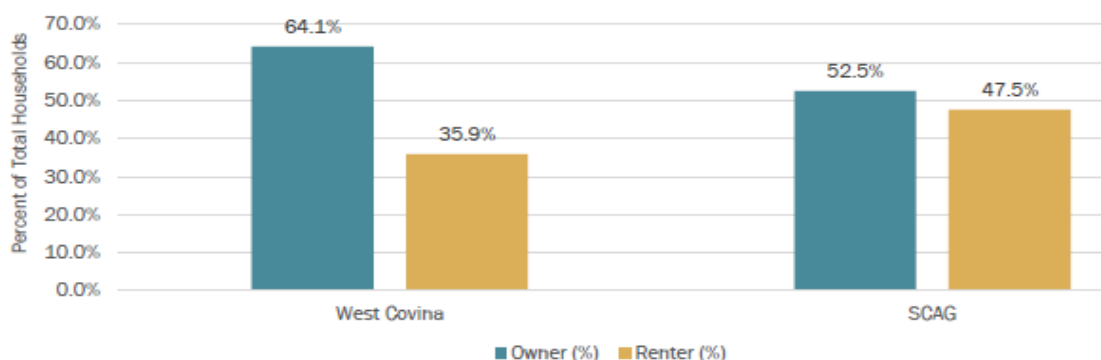


CA DOF E-5 Population and Housing Unit Estimates

### 3.5.2 Tenure

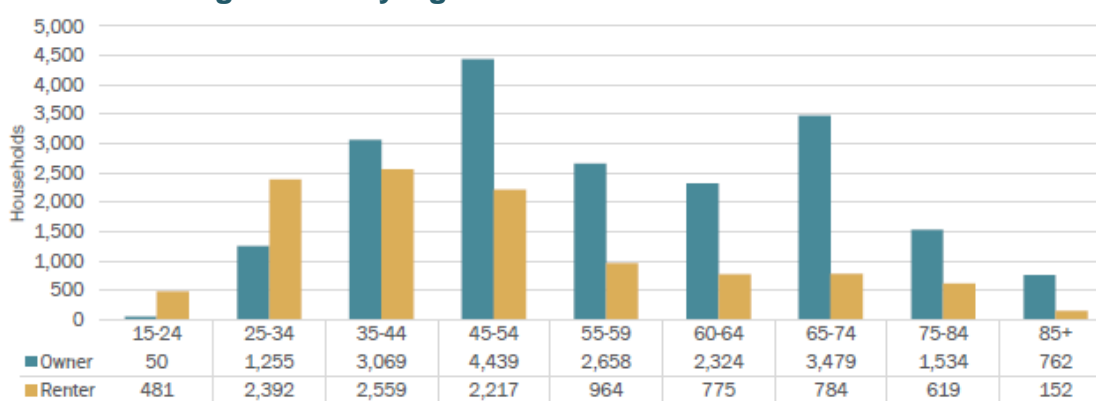
Housing tenure refers to whether a given unit is owned or rented. According to recent Census estimates, nearly two-thirds of housing units in West Covina were owner-occupied compared to only about 53% for the region as a whole (**Figure 3-7**). **Figure 3-8** shows the relationship between tenure and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



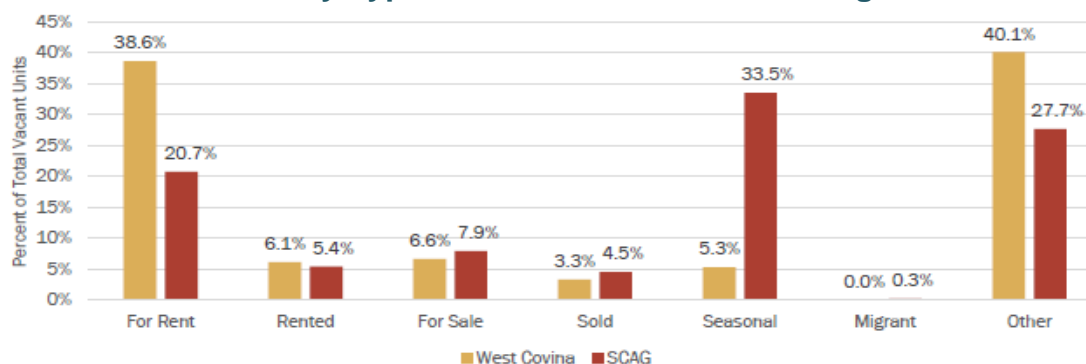
American Community Survey 2014-2018 5-year estimates.

### 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**



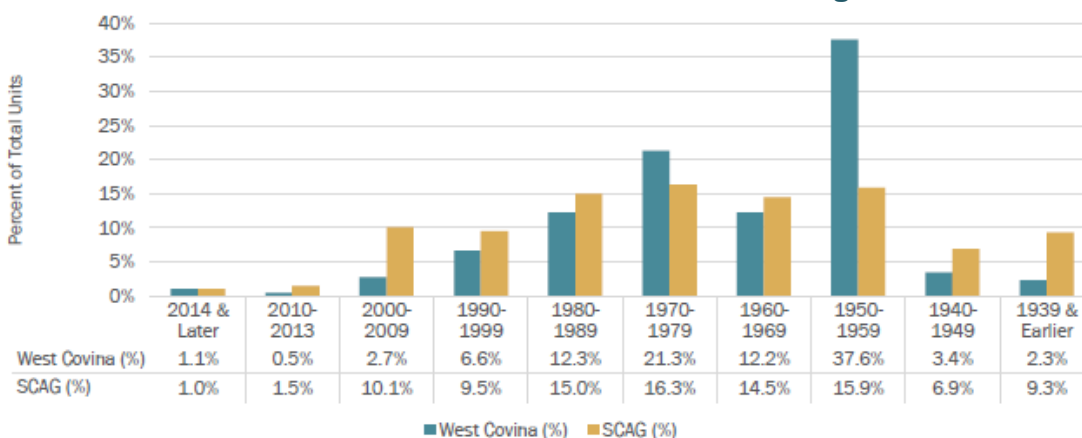
American Community Survey 2014-2018 5-year estimates.

### 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.

Because roughly 80% of the City's housing stock is more than 40 years old, it is likely that a large number of homes are in need of rehabilitation. A general reconnaissance of older neighborhoods in the City suggests that between 2% and 3% 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

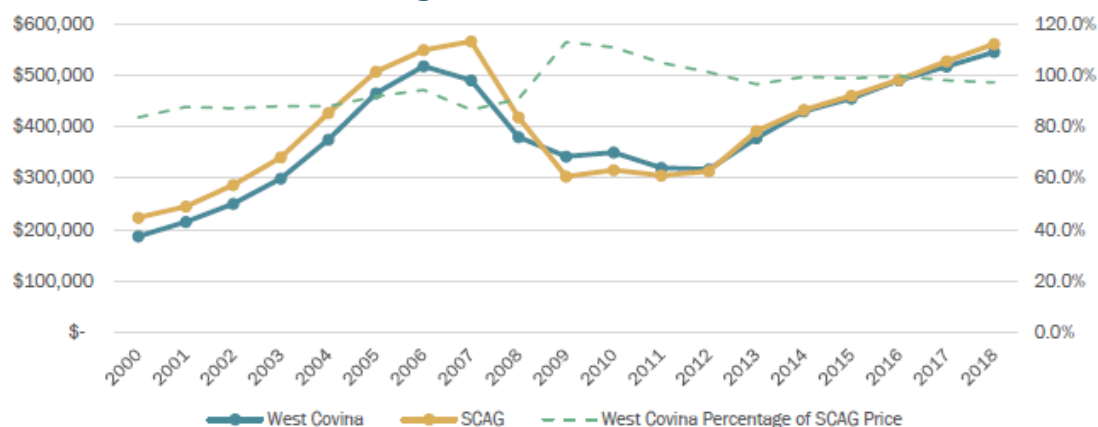
The following section discusses recent data regarding owner and rental housing cost in West Covina.

### 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.

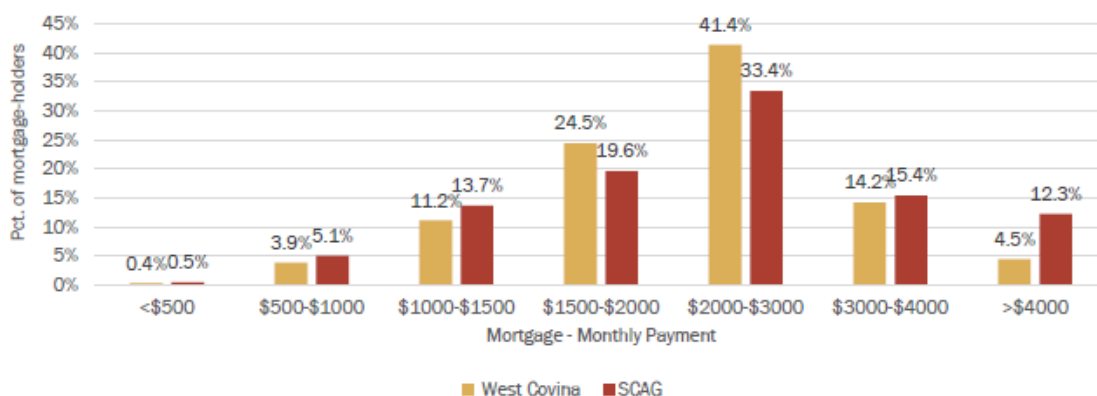
**Figure 3-11 Median Home Sales Prices for Existing Homes 2000-2018 – West Covina vs. SCAG Region**



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.

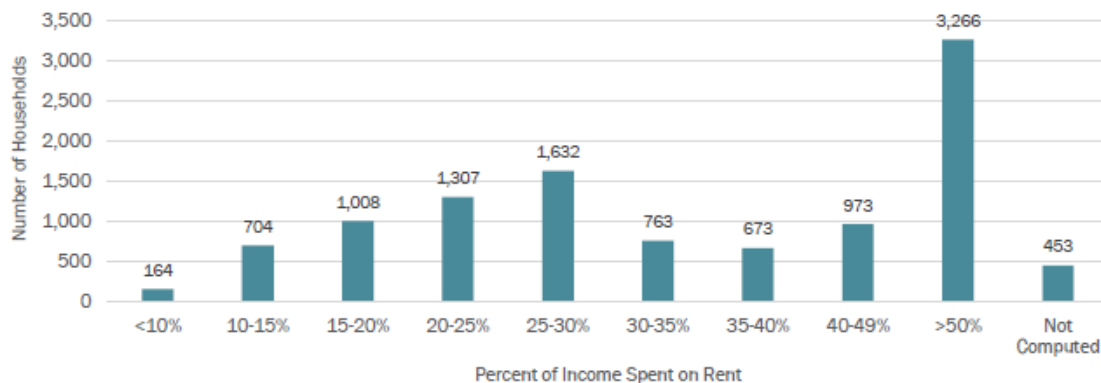
As housing demand continues to surpass supply, the cost of housing in Southern California is expected to remain high in comparison to the nation as a whole. This is of great concern not only for lower-income families who often cannot afford a large down payment but is increasingly impacting middle class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

### 3.6.2 Rental Rates

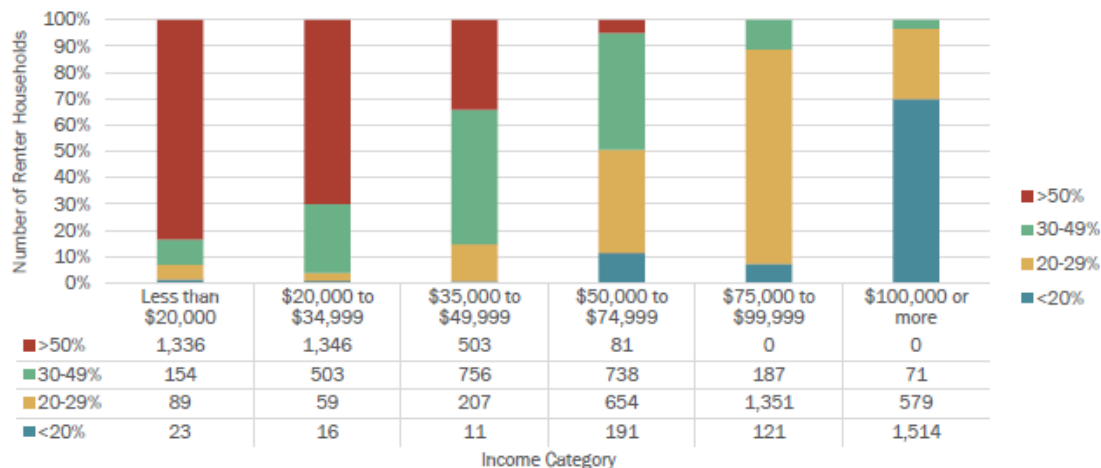
**Figure 3-13** shows recent Census estimates of rental costs as a percentage of income in West Covina. The most common monthly rental expense is more than 50% of income, which is considered by State and federal standards to be overpayment. As seen in **Figure 3-14**, the percentage of household income spent on rent is typically higher for households at the

lower end of the income spectrum. According to recent Census estimates, the median rent in West Covina is approximately \$1,674 per month.

**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

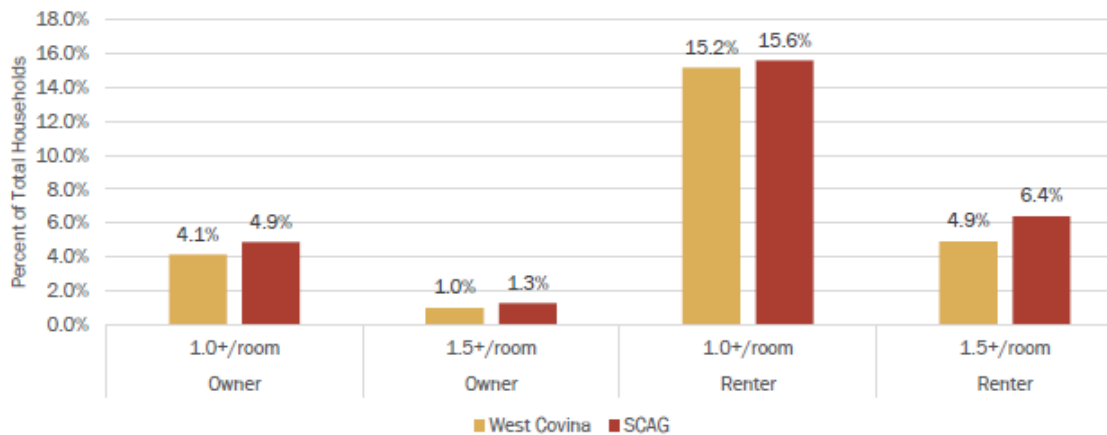
In response to higher home prices, lower-income households must often accept smaller housing units. This can result in overcrowding, which places a strain on physical facilities, does not provide a satisfying living environment, and can have an effect on local neighborhoods. The US Census defines overcrowding 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% 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 3,856 (20%) owner-occupied households and about 2,270 (21%) renter-occupied households in West Covina.

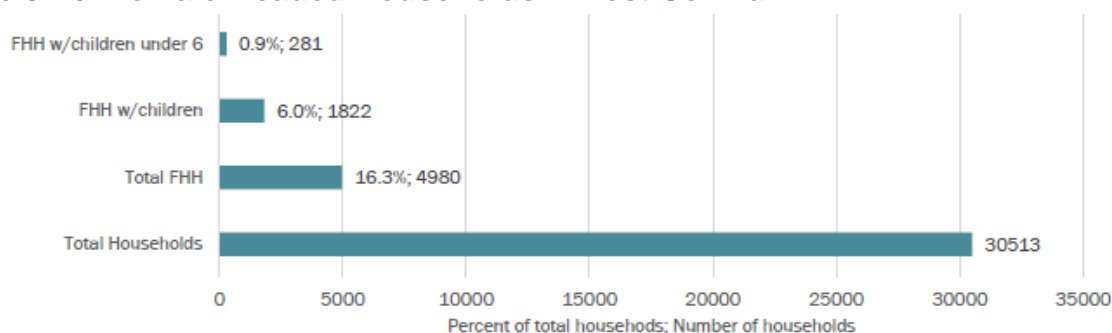
Difficulties in securing housing large enough to accommodate all members of a household is more challenging for renters, because multi-family rental units are typically smaller than single-family ownership units. While apartment complexes in the City offering three bedrooms are common, apartments with 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).

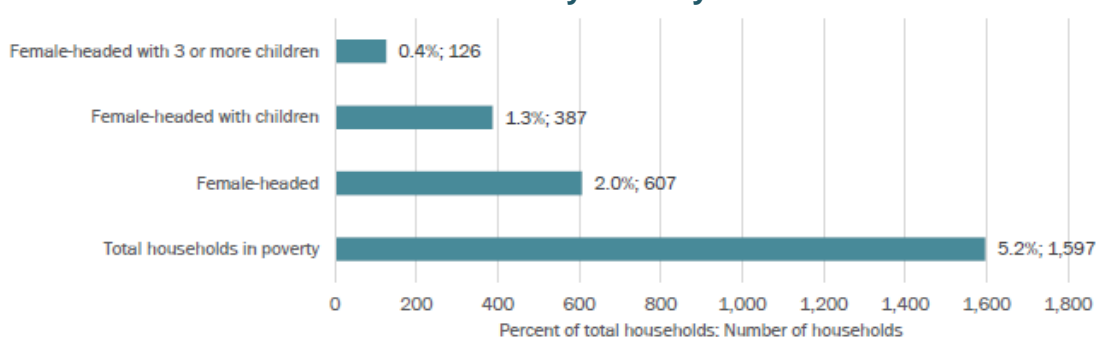
About 5.2% of West Covina's households are experiencing poverty, compared to 7.9% of households in the SCAG region. **Figure 3-17** shows estimated poverty rates for female-headed households in West Covina.

**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**



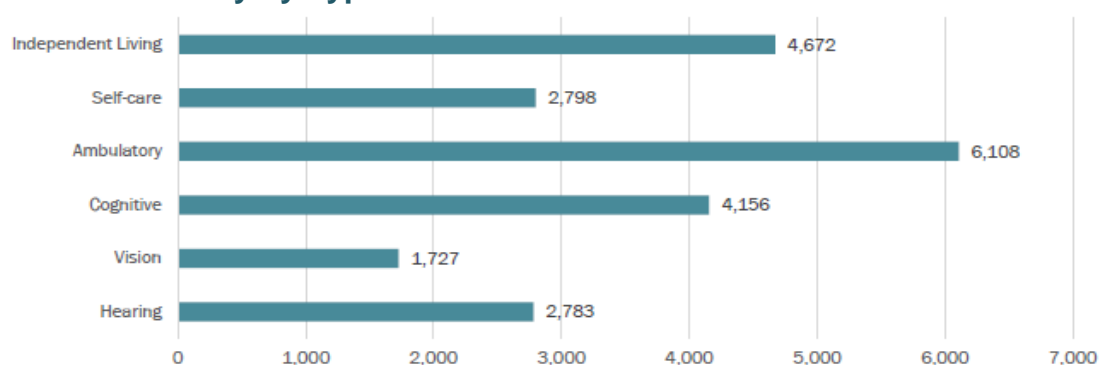
American Community Survey 2014-2018 5-year estimates.

### 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.

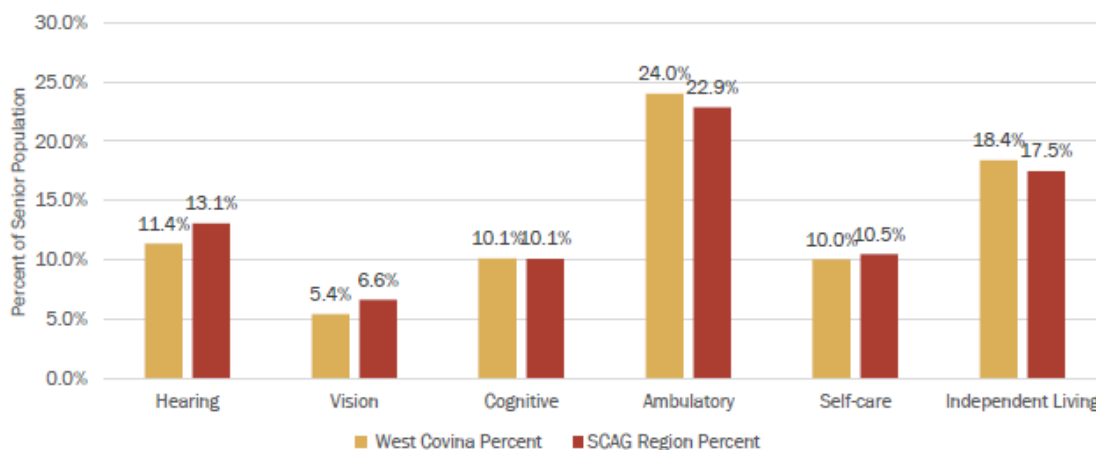
**Figure 3-18 Disability by Type – West Covina**



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.

According to the Department of Social Services there are approximately 22 residential care facilities in West Covina to serve the needs to those with disabilities.

Both the federal Fair Housing Act and the California Fair Employment and the Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The City Zoning Code establishes a formal procedure to consider applications for reasonable accommodation.

### 3.7.5 Developmental Disabilities

According to Section 4512 of the Welfare and Institutions Code, a "Developmental disability" means a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual which includes mental 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 as reported by SCAG, June 2019.

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 households by income category, tenure and degree of overpayment. This table shows that households in the lowest income categories, especially renters, experience a very high level of cost burden. According to SCAG tabulations, the race/ethnicity with the highest share of extremely-low-income households in West Covina is Black, non-Hispanic (16.9% 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 by Tenure – West Covina**

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

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. The Census of Agriculture from the US Department of Agriculture (USDA) documented that out of California's approximate 377,500 agricultural workers, less than 1% (3,266) were located within Los Angeles County as of 2017. While Los Angeles County still has areas with agricultural activity, farmland in West Covina has been almost entirely converted 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. Of the 834 affordable units, 349 are targeted for seniors. None of these projects is at-risk of conversion to market rate during 2021-2031.

**Table 3-7 Affordable Housing Projects – West Covina**

Project	Project Type	Total Affordable Units	Funding Source	Expiration Date	At Risk?
Brookhollow Apartments 2600 S. Azusa Ave.	Non-targeted	85	LIHTC	2053	No
Lark Ellen Village 1350 E San Bernardino Rd.	Large family	121	LIHTC; HUD; CalHFA	2037	No
The Promenade 1333 W Garvey Ave N.	Non-targeted	123	LIHTC	2070	No
Vintage Gardens 1950 Badillo St.	Senior	186	LIHTC	2054	No
West Covina Senior Villas I 1842 E. Workman Ave.	Senior	17	CalHFA	2035	No
West Covina Senior Villas II 1838 E. Workman Ave.	Senior	64	CalHFA	2102	No
Cameron Park 929 W. Cameron Ave.	Non-targeted	156	LIHTC; HUD	2073	No
Olive Tree Terrace 721 N. Azusa Ave.	Senior	82	HUD	2040	No

Source: California Housing Partnership Corporation; City of West Covina, 2022.

### 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.



## Section 4

# 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.

Designation	Transect	Description
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.
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.

## Development 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 the following seven residential land use categories:

- 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 allowable 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 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	2 covered and 2 uncovered	2 covered and 2 uncovered	2 covered and 2 uncovered	2 covered and 2 uncovered	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 Non-Condo: 2 (1 covered) plus 10% addition for guest parking	Condo: 2 enclosed per unit, plus 1 guest per 4 units Non-Condo: 2 (1 covered) plus 10% addition for guest parking	Condo: 2 enclosed per unit, plus 1 guest per 4 units Non-Condo: 2 (1 covered) plus 10% addition for guest parking
Building setbacks from property lines	Minimum: 15 ft. Average: 20 ft.	Minimum: 15 ft. Average: 20 ft.	Minimum: 15 ft. Average: 20 ft.	Minimum: 15 ft. 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. Abutting R-A or R-1: 20 ft.	Minimum: 20 ft. Abutting R-A or R-1: 20 ft. 1 story-20 ft. 2 story-20 ft.	Minimum: 20 ft. Abutting R-A or R-1: 20 ft. 1 story-20 ft. 2 story-20 ft. 3 story-30 ft.	Minimum: 15 ft. 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

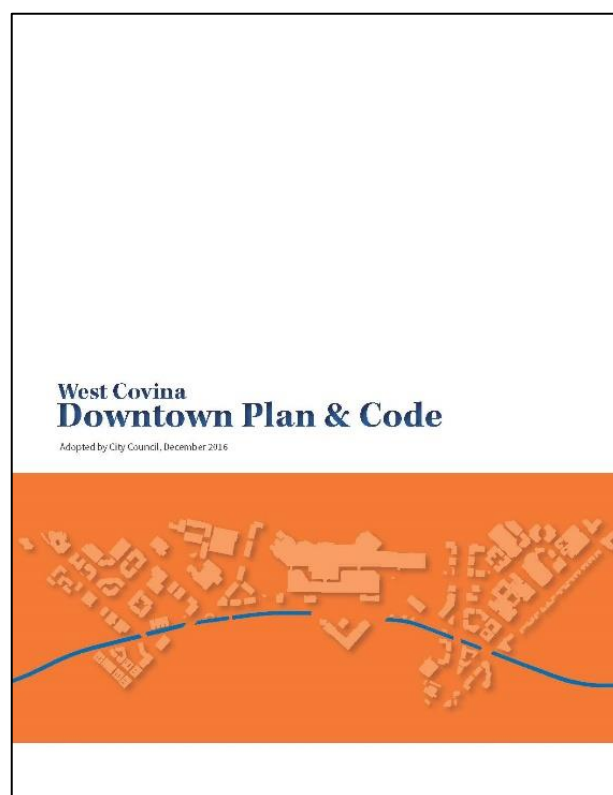
Source: City of West Covina, 2013

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**

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

### Mixed Use Overlay Zone

The General Plan encourages a wide range of building types within the Commerce land-use designation, including a mix of functions such as commercial, entertainment, office and housing at densities up to 54 units per acre in the Downtown Plan area and up to 20 units per acre outside the Downtown Plan area. The Mixed Use Overlay (MUO) Zone establishes development standards for housing in non-residential zones consistent with the intent of the General Plan.

Allowable residential uses in the MUO area include single-family detached or attached units, home occupations and low barrier navigation centers. SB 35 projects and developments providing at least 25% low-income units are eligible for ministerial review and approval by the Community Development Director subject to the Multifamily Objective Design Standards. A minimum leasable commercial gross FAR of 0.15 is required for mixed-use projects to serve residential uses with a 45-foot height limit.

### 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).

### Building Codes and Enforcement

The City adopted the 2019 California Building Code (CBC) with Los Angeles County Amendments and further amended Chapter 9, Fire Sprinkler Requirements to be in coordination with Fire Code Amendments. Like many other jurisdictions, property and building maintenance standards are included in the Municipal Code to protect the appearance and character of residential neighborhoods. The established standards require property owners to maintain landscaped areas for aesthetic, health, and fire safety reasons. Building maintenance regulations address abandoned buildings, deteriorating paint,

deteriorating roofs, or broken windows. Analysis of the City's landscape maintenance standards for buildings and residential properties reveals that the standards imposed are minimal routine maintenance requirements and do not pose a significant impediment or act as a constraint to existing residential housing units or to the development and maintenance of affordable housing. These codes are typical of other cities and do not act as a constraint on the cost and supply of housing.

### **Cumulative Effect of Land Use Controls**

The City is currently in the process of comprehensively updating the Development Code to ensure consistency with the General Plan and streamline the development review process. Specific objectives for the Development Code update are listed below and are also included in several of the programs contained in the Housing Plan (Section 2).

- Adopt mixed-use development standards to allow residential development in commercial zones
- Adopt objective design standards for multifamily residential development
- Combine zoning and subdivision regulations into a Development Code
- Consolidate commercial and residential zoning categories
- Reduce parking standards in all categories
- Create performance standards for certain uses
- Revise land-use matrix to allow more uses by-right and through staff level approval
- Create performance standards for certain commercial uses

#### **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) Development Plan (DP) General Plan Amendment (GPA) Precise Plan (PP) Tentative Parcel or Tract Map (TPM-TTM) Variance (VAR) Zone Change (ZC) Adult Oriented Businesses	\$90 per hour of staff time Actual cost of City Attorney \$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: Large Family Daycares Outdoor Dining/Uses in O-U Zone Single Family Dwelling Large Expansion Maximum Unit Size Exception Sign Exception Review Retaining Walls/Elevated Structures Mounted Wireless Telecommunication Facility Administrative Review	\$90 per hour of staff time \$770 deposit required
AIPP Review	\$90 per hour of staff time \$1,000 deposit required
Appeal to Planning Commission	\$750 non-refundable filing fee \$90 per hour of staff time
Appeal to Planning Commission (Non-Hearing Items)	\$348 non-refundable filing fee \$90 per hour of staff time
Code, Covenants & Restrictions Review	\$1,094 Flat Fee Actual cost of City Attorney
Conceptual Plan Review	\$90 per hour of staff time \$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 \$2,500 deposit required
Minor Modification Review/Minor Site Plan Review (includes Massage Technician Review and Model Home Marketing Complex)	\$90 per hour of staff time \$1,300 deposit required
Preliminary Review Meeting	\$3,000 Flat Fee
Prospective Homeowners Awareness Package Review	\$1,094 Flat Fee Actual cost of City Attorney
Slight Modification	\$90 per hour of staff time \$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**). West Covina's impact fees include a dwelling unit fee, park fees, and school fees. Los Angeles

County provides sewer service to the City, and charges a related sewer connection fee. The dwelling unit fees are applied to pay a portion of the costs identified for public facilities used for transportation services, storm drain facilities, and police and fire services. Although impact fees and requirements for offsite improvements add to the cost of housing, these fees and requirements are necessary to maintain public health and safety within a community.

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

Although development fees act as a constraint to housing development by increasing development cost, local governments have little control over this issue due to the statewide property tax limitations imposed by the voters in 1978 through Proposition 13. As a result, new development typically bears a larger share of the cost of public services and facilities than existing property owners. Based on the voters' rejection of Proposition 15 in 2020 it appears that property tax limitations will continue to act as constraint to the financing of public facilities in the foreseeable future.

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

Impact Fee Category	Fee Amount
Traffic Congestion Relief Fees	A mitigation fee might be charged if project is creating traffic impacts.
Park & Recreation Land Dedication	The Park/Recreation Impact Fee or In-Lieu fee is based on the amount of land to be dedicated that provides 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.

While fees charged on residential developments in West Covina vary depending on many factors unique to each project, total fees are estimated to be approximately \$24,441 for a typical single-family unit and \$15,011 for a typical multi-family unit, which represents approximately 7% of total development cost for a typical single-family unit and 6% for a typical multi-family unit. These fees were established based upon applicable State law, are comparable to those of surrounding communities in Los Angeles County and are not considered to be an unreasonable constraint to the development of housing within the context of the statewide property tax limitations.

**Table 4-9 Development Fee Summary**

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

Source: City of West Covina, 2022

Based upon typical developments

#### 4.1.4 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 4-10** 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 4-10 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 scheduled with the developer to discuss design and phasing of the project. Following this meeting, an appointment with the Development Review Committee is scheduled and the plans are routed to the various City departments including Fire, Public Works and Building for review. The Development Review Committee evaluates the plans for completeness as well as assessing comments made by the various City departments. The Committee also typically reviews the plans for architectural and design compatibility with the surrounding neighborhood and consistency with the character of the City. The Committee may also determine if any conditions of approval, such as capital improvements, are necessary to complete the project. Conditions of approval typically protect the health, safety and welfare of the public and ensure a project's consistency with established architectural design guidelines.

Upon completing its review the Committee's conditions of approval are sent to the applicant. At the applicant's request a meeting can be scheduled to discuss the conditions of approval. If the applicant accepts the findings and conditions the project is scheduled for 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.

**Requests to develop housing at densities below those identified in the inventory and the length of time between receiving approval for a housing development and submittal of an application for building permits**



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

The time from project approval to submittal of building permit applications varies depending on the complexity of the project. Recent project examples have ranged from approximately 4 months to 9 months depending on project size and complexity.

#### **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.

#### **Reasonable Accommodation for Persons with Disabilities**

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

City procedures for ensuring that reasonable accommodation is available for persons with disabilities are established in Municipal Code §26-298.02. Applications for reasonable accommodation are reviewed administratively by the Community Development Director unless the application is part of a larger project subject to a higher level of review, in which case the decision on the reasonable accommodation is made as part of the larger package of applications.

The following factors are considered in making a determination regarding the reasonableness of any request for reasonable accommodation:

- (1) The need for the requested modification, including alternatives that may provide an equivalent level of benefit;
- (2) The physical attributes of and any proposed changes to the subject property and structures;
- (3) Whether the requested modification would impose an undue financial or administrative burden on the city;

- (4) Whether the requested modification would constitute a fundamental alteration of the city's general plan, applicable specific plan, zoning or subdivision program;
- (5) Whether the requested modification would result in a concentration of uses otherwise not allowed in a residential neighborhood to the substantial detriment of the residential character of that neighborhood;
- (6) Whether the requested modification is being provided primarily to benefit one (1) or more persons with a disability;
- (7) Whether the requested modification is necessary for therapeutic benefit to the person(s) with a disability;
- (8) Whether the requested modification would result in a substantial increase in traffic or insufficient parking;
- (9) Whether the requested modification would significantly deprive any neighboring property owners of the use and enjoyment of their own properties;
- (10) Whether there are preferable and/or feasible alternatives to the requested accommodation that may provide an equivalent level of benefit;
- (11) Whether proposed changes to property or structures are compatible with surrounding development or create potential impact(s) on surrounding uses;
- (12) Whether the findings of section 26-298.12(b) exist;
- (13) Any other factor that may have a bearing on the request.

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

- (1) That the dwelling, which is the subject of the request for reasonable accommodation, will be used by an individual with a disability protected under the Acts;
- (2) That the requested modification is necessary to make the dwelling available to an individual with a disability protected under the Acts;
- (3) That the requested modification would not impose an undue financial burden on the city;
- (4) That the requested accommodation would not require a fundamental alteration in the nature of the city's overall land use and zoning;
- (5) That the accommodation will not result in a direct threat to the health and safety of other persons or physical damage to the property of others.

No reasonable accommodation requests have been submitted in recent years. However, to ensure that City procedures do not act as an unreasonable constraint on housing for persons with disabilities, these procedures will be reviewed and updated as necessary to ensure compliance with fair housing law as part of the comprehensive Development Code update (Program 4.2).

## **Residential Care Facilities**

In accordance with State law residential care facilities for six or fewer residents are allowed as a permitted use in all single-family residential zones. West Covina does not impose additional zoning, building code, or permitting procedures on small care facilities other than those that apply to single-family uses as allowed by State law.

Larger residential care facilities for seven or more persons are not currently defined in the Zoning Ordinance; however, skilled nursing and assisted living facilities are explicitly allowed by the Code subject to approval of a conditional use permit in the R-1, R-A, MF-8, MF-15, MF-20, MF-45, N-C, S-C, R-C, O-P, C-2, C-3 zones (Municipal Code §26-597).

In recent years the City has approved two large assisted living projects - 1400 W. Covina Parkway, a 5-story facility with 131 beds and 111 units and memory care (2017) and 1415 W. Garvey Avenue North, a 5-story facility with 107 beds and 92 units and memory care (2019).

To ensure clarity in City regulations and minimize potential constraints to persons with disabilities, the Development Code update will include a definition and regulations for large residential care facilities consistent with fair housing law (see Program 3.1 in Section 2).

### **Definition of “Family”**

The Municipal Code defines *Family* as “an individual or group of individuals, related or unrelated, living together as a single housekeeping unit, including necessary servants. A family does not include institutional group living situations such as a residential facility, rest home, dormitory, or similar use, nor does it include such commercial group living arrangements such as a roominghouse, motel, hotel, or similar uses.” This definition is consistent with fair housing law and does not act as a constraint on housing for persons with disabilities.

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 §§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.

### **Manufactured Housing**

Government Code §65852.3 requires that manufactured housing on a permanent foundation be permitted in the same manner as single-family housing in the same zone. City regulations are consistent with this requirement.

### **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 July 2022 and are incorporated as §26-685.30 of the Municipal Code. These regulations incorporate comments provided by the Department of Housing and Community Development in February 2022 and are consistent with current State law. Program 3.4 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 §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 community development 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 § 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.

### **Agricultural Employee Housing**

The Employee Housing Act (Health and Safety Code § 17021.5 and § 17021.6) requires agricultural employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone, and requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. The current Zoning Code does not include a definition of agricultural employee housing or regulations for agricultural employee housing. Program 3.1 is included in the Housing Plan to update City regulations for agricultural employee housing consistent with current law.

### **Other Local Ordinances**

Inclusionary housing. The City has not adopted inclusionary housing requirements.

Short-term rentals. Short-term vacation rentals are not allowed in residential zones.



SB 9 Urban Lot Splits. The City has adopted regulations for urban lot splits consistent with SB 9.

## **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.

### **Availability of 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.

The ability to secure financing can be influenced by several factors, including creditworthiness, debt-to-income ratio, and the restrictiveness of mortgage lending standards. Data compiled under the Home Mortgage Disclosure Act (HMDA) provides an indication how lending practices affect a community's home sales. While the availability of mortgage financing in West Covina is similar to other areas of the Los Angeles metropolitan area, the most recent Los Angeles County Analysis of Impediments<sup>1</sup> reported that fair housing public input and HMDA data indicate that racial and ethnic minorities, as well as other protected classes, face discrimination in private rental and homeowner markets. HMDA data shows that some racial and ethnic minorities are more likely to be denied a mortgage. In addition, HUD Fair Housing Complaint Data for the Los Angeles Urban County area, which includes West Covina, showed over 2,600 complaints between 2008 and 2016. The basis of these complaints was most likely to be disability, race, or familial status. In addition, the Fair Housing survey found that 9.3% of respondents indicated that their home loan application was denied in the past 5 years. According to HMDA data, between 2008 and 2015, black mortgage applicants are denied at a rate more than 7 percentage points higher than white applicants, and Hispanic applicants are denied at a rate more than 5 percentage points higher than non-Hispanic applicants.

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<sup>1</sup> 2018 Analysis of Impediments of Fair Housing Choice for the Community Development Commission and Housing Authority of Los Angeles County



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

## **4.3 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.

#### **4.3.1 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% of its water supply. The remaining water supply is supplied locally through groundwater supplies. Based on verbal communication with SWS it is anticipated that there is adequate water supply to accommodate the City's RHNA allocation. Project-specific analysis may be required when a project is proposed to determine if the existing infrastructure and proposed demand need to be addressed. Generally, water supply is not seen as a constraint to the development of housing in West Covina.

## **Wastewater**

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

## **Dry Utilities**

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

## Section 5

# Housing Resources

This section 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>2</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

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

and design teams to make informed decisions regarding energy efficiency features. This approach offers the non-residential building industry a multi-faceted program designed to consistently serve the needs of the building community throughout California. Savings by Design encourages energy-efficient building design and construction practices, promoting the efficient use of energy by offering up-front design assistance supported by financial incentives based on project performance.

- PACE Financing Program for Commercial Properties - Upgrading or retrofitting buildings to use less energy and water or produce clean energy can lower operating costs while increasing property value. In an effort to make these energy improvements more attainable for property owners, Renovate America offers the Property Assessed Clean Energy (PACE) financing program. Unlike a traditional loan, PACE financing is paid back via an assessment on the property tax bill. PACE financing allows owners of commercial properties to finance up to 100% of the cost of installing energy-efficient, renewable energy and water-saving improvements and immediately enjoy the benefits of lower utility bills. PACE offers low fixed rates and extended terms of 5 to 20 years to help keep payments affordable.
- Electric Lawn Mower Rebate Program - A rebate is available to residents that purchase a qualifying electric lawn mower. Residents that purchase a new, cordless electric lawn mower and scrap their old gas mower are eligible for a rebate based on the purchase price of the new mower. The on-line application is available at [www.aqmd.gov/lawnmower](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 –

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# 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.

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

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the State'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.

### **Cumulative Effectiveness in Meeting the Housing Needs of Persons with Special Needs**

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

The City of West Covina currently has six affordable multifamily housing complexes and five additional deed-restricted complexes. Six of these housing communities have housing specifically reserved for seniors. In total the city has 687 deed-restricted affordable units.

To determine how effective the City's housing programs have been in the development and maintenance of affordable housing, the city will monitor these affordable units to ensure that the rent payments charged are consistent with levels appropriate for the identified income category. The city has posted the AB 987 Affordable Housing database on its website and will continue to track affordable housing units citywide through the annual certification process. In addition, as the city develops additional affordable units these properties will be added to the table and will be monitored annually to ensure they meet affordability requirements.

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

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation
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 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.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation
Water and Sewer Service Providers	Immediately following the adoption and certification of the Housing Element, Staff will deliver copies to all providers of sewer and water service within the City of West Covina.	Ongoing	Letters mailed following adoption of Housing Element.
Flood Management	Ensure that flood risks are considered when making land use decisions.	Ongoing	The City continues to comprehensively review projects, specially projects located within moderate and minimal risk areas as identified by FEMA.
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.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation
Housing for Developmentally Disabled Persons Program	Offer specific regulatory incentives when funding is available, apply for funding at least twice during the planning period.	Ongoing	The City continues to monitor for potential developers and funding programs. No applications have been submitted.
Ensure Adequate Sites to Accommodate the RHNA	Ensure sufficient residential capacity to accommodate the identified regional need for lower-income households.	Ongoing	The City has adopted a Downtown Plan and Code that allows mixed use and mid to high density residential development.
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
<b>Total</b>	<b>5,346 units</b>

## Potential Sites to Accommodate the (RHNA)

The inventory of sites for potential housing development is comprised of approved projects, vacant and underutilized properties with potential for additional residential development or redevelopment, and potential accessory dwelling units (ADUs), as 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				
	Very Low	Low	Mod	Above Mod	Total
Approved Projects (Table B-2)			-	379	379
Vacant or Underutilized Sites (Table B-3)	2,000	1,090	5,427	-	8,864
Potential ADUs	34	64	3	42	143
<b>Total Sites Inventory</b>	<b>2,034</b>	<b>1,154</b>	<b>5,430</b>	<b>421</b>	<b>9,386</b>
<b>RHNA 2021 - 2029</b>	<b>1,653</b>	<b>850</b>	<b>865</b>	<b>1,978</b>	<b>5,346</b>
<b>Adequate Sites?</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

Source: City of West Covina, 2022

## Approved Projects

Housing developments that have received approval and are expected to be completed during the 6<sup>th</sup> cycle RHNA period are listed in Table B-2. These projects are conservatively assigned to the above-moderate affordability categories.

## Sites Inventory Overview and Analytical Approach

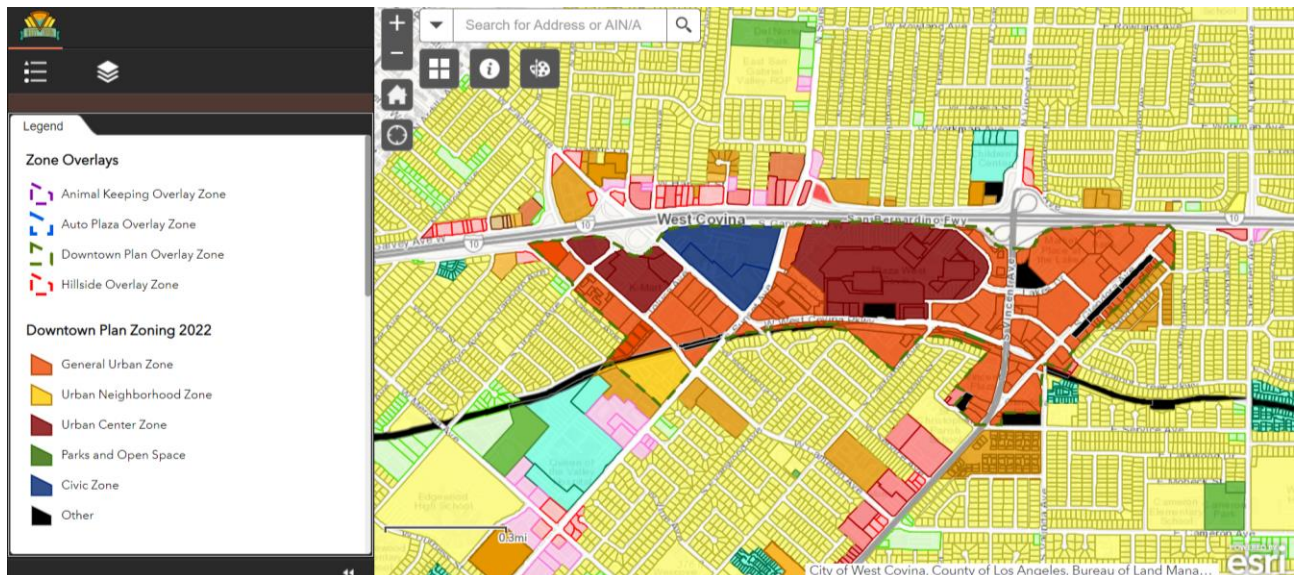
As with many mature communities in the highly urbanized areas of Los Angeles County, West Covina has almost no vacant land suitable for residential development. Pursuant to Government Code §65583.2(g)(2) when a city is relying on underutilized non-vacant sites to accommodate 50% or more of its lower-income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

Most new residential development in West Covina is expected to occur in two general areas: the Downtown Plan Area and the Mixed Use Overlay Zone.

### Downtown Plan Area

As discussed previously in the Constraints section, 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 include development standards to encourage and facilitate the development of higher-density residential infill and mixed-use projects by allowing reduced parking requirements and deviations from the standards typically required in multi-family residential zones. Residential densities up to 54 units/acre are allowed in the Downtown. The Downtown Plan area is shown in Figure B-1.

**Figure B-1**  
**Downtown Plan Overlay Zone Map**



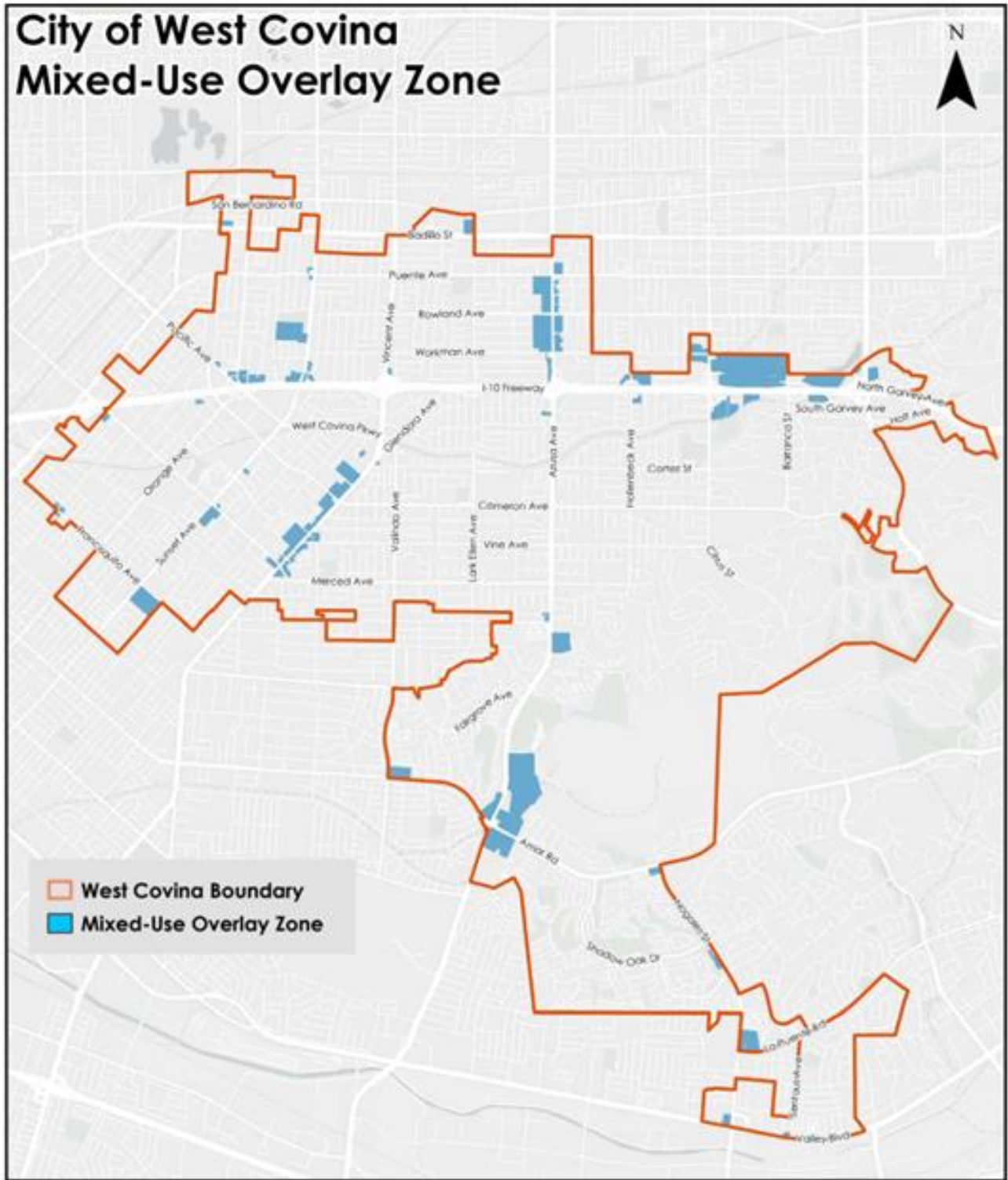
**Mixed Use Overlay Zone**

The General Plan encourages a wide range of building types within the Commerce land-use designation, including a mix of functions such as commercial, entertainment, office and housing at densities up to 54 units per acre in the Downtown Plan area and up to 20 units per acre outside the Downtown Plan area. The Mixed Use Overlay (MUO) Zone establishes development standards for housing and mixed-use at densities up to 20 units/acre in non-residential zones outside the Downtown Plan area consistent with the intent of the General Plan.

Allowable residential uses in the MUO area include single-family detached or attached units, home occupations and low barrier navigation centers. SB 35 projects and developments providing at least 25% low-income units are eligible for ministerial review and approval by the Community Development Director subject to the Multifamily Objective Design Standards. A minimum leasable commercial gross FAR of 0.15 is required for mixed-use projects to serve residential uses with a 45-foot height limit.



Figure B-2  
Mixed Use Overlay Zone Map



## Affordability Assumptions

Based on the “default density” provisions of State law,<sup>3</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 §65583.2(c)(2)(A).

## Development Trends and Assumptions for Underutilized Sites

Recent real estate development trends in the San Gabriel Valley have been highly favorable for multi-family development and the City has seen significant interest in housing redevelopment on non-vacant properties. Table B-3 illustrates the strong interest in multi-family and mixed-use redevelopment in West Covina. These examples demonstrate that existing uses on nonvacant commercial properties do not constitute an impediment to redevelopment. While the assessed improvements-to-land (I/L) ratio is often used as an indicator of economic underutilization, it should be noted that limitations on assessments under Proposition 13 can distort I/L ratios when a property has not sold and been reassessed at market value in many years.

A recent example of new mixed-use development on a non-vacant site 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 and is built at 127% of the maximum density for the Downtown zone. The site was previously occupied by a furniture store.



Table B-3 summarizes recent housing development projects in West Covina on non-vacant sites. This summary shows that the average density of these projects was over 100% of the maximum allowable density under zoning regulations, and all but one of the projects had a density of at least 89% of the allowable maximum. In recent years, there have been no applications in West Covina for 100% non-residential development in zones that allow both residential or non-residential uses.

Based on this analysis the realistic capacity of parcels in the sites inventory (Table B-4) has been conservatively estimated as 75% of the maximum allowable.

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

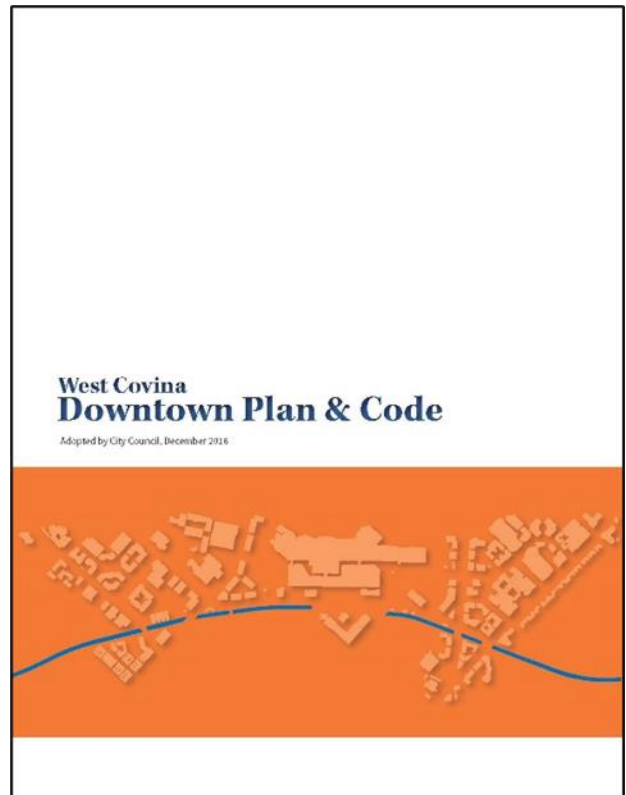


## Underutilized Sites Inventory

Underutilized sites suitable for housing development are listed in Table B-4. This table demonstrates that there is potential capacity for approximately 8,864 new housing units on these sites. All of the sites assigned to the lower-income categories are located within the Downtown Plan area (Figure B-1). The General Plan establishes allowable densities of up to 54 units/acre in the Downtown Plan area.

Each of the sites identified as suitable for lower-income housing has one or more of the following factors that enhance its potential for additional housing development 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
- Low development intensity/density compared to the allowable intensity under current zoning
- Existing nonconforming buildings
- 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 conservatively estimated as 75% 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.

## Accessory Dwelling Units

Under State law, two accessory dwelling units (ADUs) – one ADU and one junior ADU (JADU) – may be permitted on most single-family residential lots. Therefore, ADUs represent a

significant source of new affordable housing that can be created within the fabric of existing residential neighborhoods. To encourage property owners to build ADUs or JADUs, the City has created a webpage<sup>4</sup> with application instructions, development standards and sample plans.

As residents have become more aware of opportunities for ADUs, building permits during the past 3 years in West Covina have shown a steadily increasing trend in ADU development as follows:

2019: 15 ADU permits  
 2020: 17 ADU permits  
2021: 20 ADU permits  
 Total: 52 ADU permits (average 17.3 per year)

A comprehensive study of ADU affordability in Southern California<sup>5</sup> recently conducted by the Southern California Association of Governments (SCAG) concluded that a significant portion of ADUs are affordable to low- and moderate-income households. Based on recent ADU permit trends and SCAG's analysis, it is assumed that an average of 17.3 ADUs per year (143 total ADUs) will be produced in the following income categories during the 2021-2029 projection period.

Very Low	Low	Moderate	Above Moderate
34 (24%)	64 (45%)	3 (2%)	42 (30%)

Source: City of West Covina, 2022; SCAG 2020

Program 3.4 in the Housing Plan describes actions the City will take to encourage the continued production of ADUs. In addition to monitoring legislation and updating City ADU regulations as necessary to ensure ongoing consistency with State law, the City will incentivize and promote ADU development in the following ways:

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

<sup>4</sup> <https://www.westcovina.org/departments/community-development/planning-division/adu-accessory-dwelling-units>

<sup>5</sup> [https://scag.ca.gov/sites/main/files/file-attachments/adu\\_affordability\\_analysis\\_120120v2.pdf?1606868527](https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527)

**Table B-2**  
**Approved Projects**

Project/Type	Address	General Plan/Zoning	Parcel Size (acres)	Units	Prior Use on the Site	Allowable Density (du/ac)	Project Density (% of max)	Approval Date
Vincent Place SP/ Townhouse (2 & 3-story)	1024 W. Workman Ave	Neighborhood Medium/ Specific Plan	8.05	119	Public School	9 – 20	14.8 (74%)	2021
Walnut Grove SP/ Townhouse (2 & 3-story)	1651 E. Rowland Ave	Neighborhood Medium/ Specific Plan	9.14	158	Public School	9 – 20	17.3 (87%)	2021
The Grove at Merced SP (2 story townhouse)	1912 W. Merced Ave	Specific Plan	2.26	39	Public School	9 - 20	17.3 (87%)	2022
Cameron 56/ Townhouse (3-story)	1530 W. Cameron Ave	Neighborhood Medium/ Downtown/T-4 General Urban	2.82	56	Office Building	9 – 20	19.8 (99%)	2018
Pacific Lane/ Condo (2-story)	1920 W. Pacific Lane	Neighborhood Medium/ MF-20	0.62	7	Single-Family Residential	9 – 20	11.3 (57%)	2018
<b>TOTALS</b>				<b>379</b>			<b>Avg = 81%</b>	

## Notes:

All projects expected to be completed during the 6<sup>th</sup> cycle RHNA period

All units assumed to be above-moderate income

\*Approved prior to the Downtown Code amendment

**Table B-3**  
**Recent Development Trends on Nonvacant Sites**

Project/Address APN	Project Type/ Density (% of max)	No. of Units	Lot Size (ac)	Zoning	Previous Use				Current Status
					Year Built	FAR	I/L Ratio	Description	
301 S. Glendora Ave	Mixed-Use 68 du/ac (127%)	450	6.57	Neighborhood High/ Downtown/T-4 General Urban	na	na	na	Furniture store	Completed
1530 W. Cameron Ave	Townhouse 19.8 du/ac (99%)	56	2.82	Neighborhood Medium/Downtown/ T-4 General Urban	na	na	na	Office Building	Completed
811 S. Sunset Ave 8468-016-904	Mixed-Use 48 du/ac (89%)	400 (15% affordable)	8.29	Urban Neighborhood (Downtown Plan)	1955	---	---	City Yard and Fire Station	Developer ENA
2200 E. Garvey Avenue S 8479-001-009	MFR TBD	TBD	1.40	Neighborhood- Commercial	1959	0.22	0.13	Restaurant	Developer Interest
112 Plaza Drive (Plaza West Covina Mall) Multiple APNs	Mixed-Use TBD	1,110 (15% affordable)	71	Urban Center (Downtown Plan)	1974	0.98	na	2-story enclosed mall, 3-story parking structure, 1-story pad retail	Developer Interest
3620-3670 S. Nogales St Multiple APNs	Mixed-Use 21 du/ac (105%)	163	7.75	Planned Community Development (PCD- 1)	1980	0.49	na	Retail shopping center	Developer Interest
1600-1616 W. Cameron Ave 8468-015-010 & 024	MFR 26 du/ac (48%)	84	3.25	General Urban (Downtown Plan)	1979	0.49	na	Office Buildings	Under Construction
No address 8474-009-009	MFR 52 du/ac (96%)	51	0.98	General Urban (Downtown Plan)	na	na	na	Parking Lot	Application Under Review
675 S. Glendora Ave 8475-009-018	MFR 38 du/ac (190%)	200 (15% affordable – density bonus)	5.26	Service Commercial (S-C)	1977	0.25	na	Bowling Alley	Developer Interest

**Table B-4**  
**Underutilized Sites**

APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
<b>COMMERCIAL GENERAL PLAN DESIGNATION</b>											
8457019003	1319	GARVEY AVE N	0.81	C-2/MUO	20		12		12	Shopping Center	1.64
8463026019	2201	FRANCISQUITO AVE	0.50	C-2/MUO	20		7		7	Fastfood restaurant	6.47
8480001017	2820	GARVEY AVE S	0.37	C-2/MUO	20		5		5	Office Building	0.67
8480001022	2804	GARVEY AVE S	0.93	C-2/MUO	20		13		13	Motel	0.83
8480001030	2824	GARVEY AVE S	0.52	C-2/MUO	20		7		7	Retail Building - Paint store	0.50
8480016023	2748	GARVEY AVE S	1.25	C-2/MUO	20		18		18	Motel	1.41
8725017013	2880	VALLEY BLVD	0.22	C-2/MUO	20		3		3	7-11 Convenience store	0.66
8725017015	2889	VALLEY BLVD	0.45	C-2/MUO	20		6		6	Commercial Center with two-story building	0.95
8730004023	1520	AMAR RD	1.67	C-2/MUO	20		25		25	Island Pacific Shopping Center	2.00
8730004026	2500	AZUSA AVE	0.45	C-2/MUO	20		6		6	Island Pacific Shopping Center	0.83
8730004028	2548	AZUSA AVE	0.33	C-2/MUO	20		4		4	Island Pacific Shopping Center	1.09
8730004029	2532	AZUSA AVE	7.27	C-2/MUO	20		109		109	Island Pacific Shopping Center	0.30
8474003915	1200	WEST COVINA PKWY	0.07	General Urban (D)	54	2			2	Plaza West Covina - City Property	0.00
8474003918	1200	WEST COVINA PKWY	1.74	General Urban (D)	54	70			70	Plaza West Covina - City Property	0.00
8474003940	1200	WEST COVINA PKWY	1.37	General Urban (D)	54	55			55	Plaza West Covina - City Property	0.00
8474007928	1200	WEST COVINA PKWY	3.01	Urban Center (D)	54	121			121	Plaza West Covina - City Property	0.00
8474007929	1200	WEST COVINA PKWY	2.98	Urban Center (D)	54	120			120	Plaza West Covina - City Property	0.00
8474007931	1200	WEST COVINA PKWY	0.99	General Urban (D)	54	40			40	Plaza West Covina - City Property	0.00
8474007932	1200	WEST COVINA PKWY	0.39	Urban Center (D)	54	15			15	Plaza West Covina - City Property	0.00
8474007933	1200	WEST COVINA PKWY	0.28	Urban Center (D)	54	11			11	Plaza West Covina - City Property	0.00
8474007934	1200	WEST COVINA PKWY	6.84	Urban Center (D)	54	277			277	Plaza West Covina - City Property	0.00
8474007935	1200	WEST COVINA PKWY	0.78	Urban Center (D)	54	31			31	Plaza West Covina - City Property	0.00

APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
8474007939	1200	WEST COVINA PKWY	3.40	General Urban (D)	54	137			137	Plaza West Covina - City Property	0.00
8474007940	1200	WEST COVINA PKWY	2.29	General Urban (D)	54				92	Parking lot	0.00
8474003007	688	SUNSET AVE	0.70	General Urban (D)	54	28			28	Auto repair	1.73
8474003008	666	SUNSET AVE	0.42	General Urban (D)	54		17		17	shopping center - SunsetParkway Mall	0.84
8474003009	656	SUNSET AVE	0.64	General Urban (D)	54	25			25	shopping center - SunsetParkway Mall	0.68
8474003010	652	SUNSET AVE	0.19	General Urban (D)	54		7		7	shopping center - SunsetParkway Mall	2.33
8474003057	636	SUNSET AVE	2.10	General Urban (D)	54	85			85	shopping center - SunsetParkway Mall	0.90
8474003058	642	SUNSET AVE	0.05	General Urban (D)	54		2		2	shopping center - SunsetParkway Mall	1.50
8474003063	1215	WEST COVINA PKWY	0.35	General Urban (D)	54		14		14	Plaza Shopping Mall	3.07
8474003064	610	SUNSET AVE	0.95	General Urban (D)	54	38			38	Auto repair at Plaza Shopping Mall	0.93
8474003073	1215	WEST COVINA PKWY	0.54	General Urban (D)	54	21			21	Plaza Shopping Mall	0.16
8474007019	327	VINCENT AVE	0.08	General Urban (D)	54		3		3	Plaza Shopping Mall	0.00
8474007020	333	VINCENT AVE	0.34	General Urban (D)	54		13		13	Plaza Shopping Mall	1.88
8474007032	112	FASHION PLAZA	0.14	General Urban (D)	54		5		5	Plaza Shopping Mall	9.76
8474007033	112	FASHION PLAZA	0.22	General Urban (D)	54		8		8	Plaza Shopping Mall	8.87
8474007034	112	FASHION PLAZA	1.07	General Urban (D)	54	43			43	Plaza Shopping Mall	7.09
8474007038	112	FASHION PLAZA	0.63	General Urban (D)	54	25			25	Plaza Shopping Mall	0.16
8474007040	112	FASHION PLAZA	0.16	General Urban (D)	54		6		6	Plaza Shopping Mall	0.16
8474011026	1000	LAKES DR	0.99	General Urban (D)	54	40			40	Parking Structure	2.88
8474011027	1050	LAKES DR	0.99	General Urban (D)	54	40			40	Office Building	2.88

APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
8475002032	1002	WEST COVINA PKWY	0.26	General Urban (D)	54		10		10	Shopping Center	0.02
8475006053	934	WEST COVINA PKWY	0.34	General Urban (D)	54		13		13	Drive-through restaurant/food retailer	0.72
8458025025	1610	HARBERT ST	0.27	MF-20	20		4		4	duplex - residential	0.59
8463002010	2328	MERCED AVE	1.43	MF-20	20		21		21	VFW Hall	0.72
8437024011	1901	BADILLO ST	1.59	N-C/MUO	20		23		23	Shopping Center	0.54
8442018019	645	AZUSA AVE	0.70	N-C/MUO	20		10		10	Restaurant - Denny's	3.24
8443003022	702	AZUSA AVE	1.40	N-C/MUO	20		21		21	CVS	0.80
8443019019	500	AZUSA AVE	0.90	N-C/MUO	20		13		13	Shopping Center	1.76
8453023018	2211	GARVEY AVE N	5.32	N-C/MUO	20		79		79	Shopping Center	0.97
8454012023	2149	GARVEY AVE N	1.36	N-C/MUO	20		20		20	Office Building	1.67
8454014009	1818	ROWLAND AVE	0.30	N-C/MUO	20		4		4	Drive-through dairy	0.88
8454014011	426	AZUSA AVE	2.60	N-C/MUO	20		39		39	Shopping Center	0.45
8454016001	300	AZUSA AVE	0.45	N-C/MUO	20		6		6	Gas Station	0.20
8454016014	334	AZUSA AVE	0.25	N-C/MUO	20		3		3	Shopping Center - American Legion Center	2.11
8454016019	320	AZUSA AVE	0.57	N-C/MUO	20		8		8	Shopping Center - Shoppe at West Covina	0.88
8454016021	314	AZUSA AVE	0.33	N-C/MUO	20		4		4	Restaurant/taqueria	0.75
8454016022	342	AZUSA AVE	0.29	N-C/MUO	20		4		4	Shopping Center - American Legion Center	0.57
8455014013	235	AZUSA AVE	0.79	N-C/MUO	20		11		11	shopping center - Vista Paint / 7-11	2.22
8458023020	1415	GARVEY AVE N	0.77	N-C/MUO	20		11		11	single-story office building - entitlement for Assisted Living approved in 2019 (has not submitted to building for plan check)	0.33
8458025007	1619	GARVEY AVE N	0.43	N-C/MUO	20		6		6	office building	1.63
8458025015	1618	HARBERT ST	0.44	N-C/MUO	20		6		6	vacant commercial building	0.35
8458025022	1627	GARVEY AVE N	0.25	N-C/MUO	20		3		3	Office Building	0.81
8458025026	1609	GARVEY AVE N	0.15	N-C/MUO	20		2		2	Office Building	0.36
8458025028	122	LANG AVE	0.39	N-C/MUO	20		5		5	Parking lot	0.00
8458025029	1647	GARVEY AVE N	0.32	N-C/MUO	20		4		4	Dental Office	0.54
8458027024	140	ORANGE AVE	0.66	N-C/MUO	20		9		9	Medical office/clinic	1.52
8459026001	2011	PACIFIC AVE	0.64	N-C/MUO	20		9		9	shopping center	1.37
8459026028	101	ORANGE AVE	0.47	N-C/MUO	20		7		7	Office Building	1.15
8465001003	2118	FRANCISQUITO AVE	0.12	N-C/MUO	20		1		1	Retail Building	0.18

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8465001019	2122	FRANCISQUITO AVE	0.38	N-C/MUO	20		5		5	shopping center	1.64
8467001012	2117	FRANCISQUITO AVE	0.20	N-C/MUO	20		3		3	Retail Building	0.23
8467001015	2125	FRANCISQUITO AVE	0.51	N-C/MUO	20		7		7	Drive-through dairy	0.00
8469019015	937	GLENDORA AVE	0.15	N-C/MUO	20		2		2	Shopping Center - Hong Kong Plaza	1.38
8469019016	935	GLENDORA AVE	0.19	N-C/MUO	20		2		2	Shopping Center - Hong Kong Plaza	1.20
8469019017	941	GLENDORA AVE	8.46	N-C/MUO	20		126		126	Shopping Center - Hong Kong Plaza	1.07
8469019018	961	GLENDORA AVE	0.19	N-C/MUO	20		2		2	Shopping Center - Hong Kong Plaza	0.72
8470005004	1200	SUNSET AVE	0.47	N-C/MUO	20		7		7	Shopping Center	0.42
8471001011	1324	FRANCISQUITO AVE	0.53	N-C/MUO	20		7		7	Shopping Center - Sunset Square	2.45
8471001012	1312	FRANCISQUITO AVE	0.30	N-C/MUO	20		4		4	Shopping Center - Sunset Square	2.71
8471001013	1320	FRANCISQUITO AVE	3.16	N-C/MUO	20		47		47	Shopping Center - Sunset Square	1.15
8471001015	1330	FRANCISQUITO AVE	0.30	N-C/MUO	20		4		4	Shopping Center - Sunset Square	2.45
8471001016	1200	FRANCISQUITO AVE	8.46	N-C/MUO	20		126		126	Shopping Center - Sunset Square	1.06
8475010013	715	GLENDORA AVE	0.26	N-C/MUO	20		3		3	Office Building	0.15
8475010014	709	GLENDORA AVE	0.18	N-C/MUO	20		2		2	Retail Building	1.06
8475010015	703	GLENDORA AVE	0.23	N-C/MUO	20		3		3	Office Building	1.67
8475010024	816	SERVICE AVE	0.19	N-C/MUO	20		2		2	Preschool	0.47
8479001009	2200	GARVEY AVE S	1.31	N-C/MUO	20		19		19	former restaurant - vacant building	0.13
8480002046	3104	GARVEY AVE S	0.33	N-C/MUO	20		4		4	Office Building	0.93
8480002049	3114	GARVEY AVE S	0.37	N-C/MUO	20		5		5	Vacant lot	0.00
8480002057	3120	GARVEY AVE S	0.88	N-C/MUO	20		13		13	Retail/office building	0.55
8480002058	3140	GARVEY AVE S	0.72	N-C/MUO	20		10		10	office building	0.65
8490022034	1347	AZUSA AVE	0.13	N-C/MUO	20		1		1	Shopping center	0.81
8490022035	1347	AZUSA AVE	0.37	N-C/MUO	20		5		5	Shopping center	0.47
8490022038	1335	AZUSA AVE	0.32	N-C/MUO	20		4		4	Shopping Center	0.86
8493040179	1414	AZUSA AVE	9.03	N-C/MUO	20		135		135	Shopping Center - Southhills Plaza	2.02
8493040180	1410	AZUSA AVE	0.40	N-C/MUO	20		6		6	Shopping Center - Southhills Plaza	0.68
8743006041	1005	AMAR RD	0.92	N-C/MUO	20		13		13	Shopping Center - Stater Bros.	0.86
8743006042	1025	AMAR RD	1.95	N-C/MUO	20		29		29	Shopping Center - Stater Bros.	3.20
8743006043	1027	AMAR RD	1.97	N-C/MUO	20		29		29	Shopping Center - Stater Bros.	1.98
8743006044	1071	AMAR RD	0.33	N-C/MUO	20		4		4	Shopping Center - Stater Bros.	0.90
8743006046	1001	AMAR RD	0.49	N-C/MUO	20		7		7	Shopping Center - Stater Bros.	0.54



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8454016006	1815	WORKMAN AVE	0.46	O-P/MUO	20		6		6	Office Building	0.31
8454016013	330	AZUSA AVE	0.85	O-P/MUO	20		12		12	American Legion Hall	0.65
8454016015	332	AZUSA AVE	0.08	O-P/MUO	20		1		1	Shopping Center - American Legion Center	0.96
8458020006	333	SUNSET AVE	0.49	O-P/MUO	20		7		7	Office Building	2.90
8458020007	329	SUNSET AVE	0.25	O-P/MUO	20		3		3	Single-family residential	0.45
8458023017	1503	GARVEY AVE N	0.76	O-P/MUO	20		11		11	Office Building	0.59
8458023027	222	SUNSET AVE	0.96	O-P/MUO	20		14		14	Office Building	3.07
8458027030	127	LANG AVE	0.18	O-P/MUO	20		2		2	Dental Office	1.43
8459026097	1901	PACIFIC AVE	0.87	O-P/MUO	20		13		13	Office Building	1.70
8469003009	906	SUNSET AVE	0.22	O-P/MUO	20		3		3	Medical office/clinic	0.85
8469003010	1326	ROSEWAY ST	0.21	O-P/MUO	20		3		3	Medical office/clinic	0.00
8469003011	1332	ROSEWAY ST	0.21	O-P/MUO	20		3		3	Medical office/clinic	0.00
8470005021	1290	SUNSET AVE	0.82	O-P/MUO	20		12		12	Dental Office	1.14
8470005022	1300	SUNSET AVE	2.08	O-P/MUO	20		31		31	Medical Office Building	0.66
8470005025	1250	SUNSET AVE	2.11	O-P/MUO	20		31		31	Medical Office Building	15.1 1
8477002013	203	AZUSA AVE	0.96	O-P/MUO	20		14		14	Office Building	0.64
8474007035	0	W West Covina Pkwy	1.83	Parks & OS (D)/Urban Center	54	74			74	Plaza Shopping Mall	0.16
8731007247	2550	AMAR RD	2.00	PCD-1/MUO	20		30		30	Shopping Center - Canyon Center	1.29
8733012030	3443	NOGALES ST	0.61	PCD-1/MUO	20		9		9	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	1.12
8733012032	3455	NOGALES ST	1.38	PCD-1/MUO	20		20		20	Bank	3.10
8733012033	3455	NOGALES ST	0.19	PCD-1/MUO	20		2		2	Bank	0.13
8734001031	3620	NOGALES ST	1.00	PCD-1/MUO	20		15		15	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	2.67
8734001032	3620	NOGALES ST	0.37	PCD-1/MUO	20		5		5	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	2.15
8734001033	3648	NOGALES ST	0.86	PCD-1/MUO	20		12		12	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	1.42

APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
8734001034	3650	NOGALES ST	2.41	PCD-1/MUO	20		36		36	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	1.20
8734001039	3652	NOGALES ST	0.46	PCD-1/MUO	20		6		6	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	2.87
8734001042	3660	NOGALES ST	2.45	PCD-1/MUO	20		36		36	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	1.09
8734001043	3660	NOGALES ST	0.07	PCD-1/MUO	20		1		1	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	3.28
8734001044	3662	NOGALES ST	0.38	PCD-1/MUO	20		5		5	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	1.78
8734001046	3670	NOGALES ST	0.13	PCD-1/MUO	20		1		1	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	12.78
8734001047	3670	NOGALES ST	0.33	PCD-1/MUO	20		4		4	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	12.65
8734001048	3646	NOGALES ST	0.41	PCD-1/MUO	20		6		6	Shopping Center - Quail Ridge - TruMark Homes submitted Preliminary application 01/2020 for 163 residential units	0.00
8735004001	1553	AMAR RD	1.93	PCD-1/MUO	20		28		28	Shopping Center - Seafood City	0.27
8735004003	2418	AZUSA AVE	1.46	PCD-1/MUO	20		21		21	Shopping Center - Seafood City	1.77
8735004005	2402	AZUSA AVE	0.86	PCD-1/MUO	20		12		12	Shopping Center - Seafood City	1.38
8735004006	2402	AZUSA AVE	0.45	PCD-1/MUO	20		6		6	Shopping Center - Seafood City	1.42
8735004009	1555	AMAR RD	4.68	PCD-1/MUO	20		70		70	Shopping Center - Seafood City	0.90
8735004010	1525	AMAR RD	1.99	PCD-1/MUO	20		29		29	Shopping Center - Seafood City	0.76
8735004012	1515	AMAR RD	0.60	PCD-1/MUO	20		9		9	Shopping Center - Seafood City	0.82
8743023028	2453	AZUSA AVE	1.39	PCD-1/MUO	20		20		20	Shopping Center - Walgreens	3.13
8743023030	2301	AZUSA AVE	4.95	PCD-1/MUO	20		74		74	Shopping Center - Walgreens	3.08
8434015033	855	LARK ELLEN AVE	1.00	R-1	20		15		15	Office Building	0.52
8434015034	845	LARK ELLEN AVE	2.39	R-1	20		35		35	Office Building	1.14
8475010021	820	SERVICE AVE	0.35	R-1	20		5		5	Medical clinic	1.22
8490022031	1336	FLEETWELL AVE	0.27	R-1	20		4		4	Single-family residential	0.91

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8451012027	2700	WORKMAN AVE	0.72	R-C/MUO	20		10		10	Shopping Center - Eastland Center	3.29
8451012028	2753	EASTLAND CTR DR	1.12	R-C/MUO	20		16		16	Shopping Center - Eastland Center	1.00
8451012036	2901	EASTLAND CTR DR	0.91	R-C/MUO	20		13		13	Shopping Center - Eastland Center	4.63
8451012037	245	BARRANCA STREET	1.04	R-C/MUO	20		15		15	Shopping Center - Eastland Center	7.71
8451012043	2851	EASTLAND CTR DR	1.04	R-C/MUO	20		15		15	Shopping Center - Eastland Center	2.87
8451012044	2970	WORKMAN AVE	0.30	R-C/MUO	20		4		4	Shopping Center - Eastland Center	3.73
8451012047	101	BARRANCA ST	0.45	R-C/MUO	20		6		6	Shopping Center - Eastland Center	2.67
8451012052	139	BARRANCA ST	0.94	R-C/MUO	20		14		14	Shopping Center - Eastland Center	1.24
8451012053	143	BARRANCA ST	0.75	R-C/MUO	20		11		11	Shopping Center - Eastland Center	3.15
8451012054	147	BARRANCA ST	1.16	R-C/MUO	20		17		17	Shopping Center - Eastland Center	0.79
8451012055	2753	EASTLAND CTR DR	38.49	R-C/MUO	20		577		577	Shopping Center - Eastland Center	1.74
8451016104	3117	GARVEY AVE N	1.65	R-C/MUO	20		24		24	Restaurant - Marie Callendars	0.98
8451016105	3133	GARVEY AVE N	1.78	R-C/MUO	20		26		26	Restaurant - El Torito	0.85
8451016113	3101	GARVEY AVE N	2.95	R-C/MUO	20		44		44	Gym - LA Fitness	1.03
8451016035	3223	GARVEY AVE N	2.88	R-C/MUO	20		43		43	Hotel	1.45
8451016107	3211	GARVEY AVE N	1.63	R-C/MUO	20		24		24	hotel	10.9 4
8451016106	3145	GARVEY AVE N	1.88	R-C/MUO	20		28		28	hotel	3.20
8442018011	501	AZUSA AVE	0.75	S-C/MUO	20		11		11	Restaurant - Norms	0.89
8442018012	1751	ROWLAND AVE	0.27	S-C/MUO	20		4		4	Office Building	0.90
8442018014	531	AZUSA AVE	0.59	S-C/MUO	20		8		8	Retail Building	0.51
8442018024	521	AZUSA AVE	0.73	S-C/MUO	20		10		10	Retail Building	0.49
8453001010	2529	WORKMAN AVE	0.64	S-C/MUO	20		9		9	Mechanic	0.63
8453001021	2525	WORKMAN AVE	2.25	S-C/MUO	20		33		33	Mechanic	1.15
8453001047	305	CITRUS ST	0.37	S-C/MUO	20		5		5	Oil change center	0.35
8453001051	2533	WORKMAN AVE	0.13	S-C/MUO	20		1		1	Mechanic	0.81
8454014010	1825	THELBORN ST	0.87	S-C/MUO	20		13		13	Office Building	0.45
8455001023	301	AZUSA AVE	13.39	S-C/MUO	20		200		200	Shopping Center - West Covina Village	2.21
8455001023	301	AZUSA AVE	3.51	S-C/MUO	20		52		52	Shopping Center - West Covina Village	2.21
8455014018	225	AZUSA AVE	0.18	S-C/MUO	20		2		2	Car tinting	0.65
8455014019	225	AZUSA AVE	0.17	S-C/MUO	20		2		2	Car tinting	0.00
8455014020	215	AZUSA AVE	0.17	S-C/MUO	20		2		2	Tire shop	1.74

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8455022023	111	AZUSA AVE	1.09	S-C/MUO	20		16		16	Shopping center	0.89
8458023022	1443	GARVEY AVE N	0.95	S-C/MUO	20		14		14	Motel	3.10
8458023025	1431	GARVEY AVE N	0.85	S-C/MUO	20		12		12	Motel	1.78
8458023026	210	SUNSET AVE	0.64	S-C/MUO	20		9		9	Retail Building	0.99
8458025030	1637	GARVEY AVE N	0.94	S-C/MUO	20		14		14	Motel	0.67
8458027046	1705	GARVEY AVE N	1.71	S-C/MUO	20		25		25	Shopping Center - Sit n Sleep Center	1.25
8475010022	777	GLENDORA AVE	2.28	S-C/MUO	20		34		34	Shopping Center - Vons	1.08
8475010023	727	GLENDORA AVE	2.25	S-C/MUO	20		33		33	Shopping Center - Vons	0.78
8480002047	3106	GARVEY AVE S	0.57	S-C/MUO	20		8		8	Office Building	0.60
8480002048	3110	GARVEY AVE S	0.37	S-C/MUO	20		5		5	Office Building	2.20
8480016024	2710	GARVEY AVE S	3.22	S-C/MUO	20		48		48	Public Storage	1.40
8725001017	2627	VALLEY BLVD	0.38	S-C/MUO	20		5		5	Shopping Center	0.00
8730004017	1540	AMAR RD	1.71	S-C/MUO	20		25		25	Shopping Center- Island Pacific	1.43
8730004018	1532	AMAR RD	3.00	S-C/MUO	20		45		45	Shopping Center- Island Pacific	1.64
8735001024	2320	AZUSA AVE	0.46	S-C/MUO	20		6		6	Shopping Center - The Heights	0.71
8735001025	2300	AZUSA AVE	0.79	S-C/MUO	20		11		11	Shopping Center - The Heights	0.59
8735001026	2312	AZUSA AVE	0.79	S-C/MUO	20		11		11	Shopping Center - The Heights	0.72
8735001027	2200	AZUSA AVE	1.43	S-C/MUO	20		21		21	Shopping Center - The Heights	0.64
8735001028	2270	AZUSA AVE	1.48	S-C/MUO	20		22		22	Shopping Center - The Heights	0.51
8735001029	2220	AZUSA AVE	14.89	S-C/MUO	20		223		223	Shopping Center - The Heights	1.47
8735001030	2370	AZUSA AVE	14.03	S-C/MUO	20		210		210	Shopping Center - The Heights	1.88
8735001031	2330	AZUSA AVE	8.93	S-C/MUO	20		133		133	Shopping Center - The Heights	0.96
8474001020	730	ORANGE AVE	2.42	Urban Center (D)	54	98			98	Floor and Décor Center	0.13
8474003018	1200	WEST COVINA PKY	2.90	Urban Center (D)	54	117			117	Plaza Shopping Mall	3.05
8474003021	1200	WEST COVINA PKWY	0.85	Urban Center (D)	54	34			34	Plaza Shopping Mall	1.31
8474003060	1129	WEST COVINA PKWY	0.28	Urban Center (D)	54		11		11	Plaza Shopping Mall	0.96
8474003061	1125	WEST COVINA PKWY	0.47	Urban Center (D)	54		19		19	Plaza Shopping Mall	1.71
8474007036	1200	WEST COVINA PKY	0.55	Urban Center (D)	54	22			22	Plaza Shopping Mall	0.16

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8474007037	1200	WEST COVINA PKWY	16.81	Urban Center (D)	54	680			680	Plaza Shopping Mall	8.84
8474007039	112	FASHION PLAZA	0.10	Urban Center (D)	54	4	4		4	Plaza Shopping Mall	0.16
8474007041	1202	WEST COVINA PKWY	2.43	Urban Center (D)	54	98			98	Plaza Shopping Mall	0.99
<b>Subtotals</b>			<b>338.93</b>			<b>2,351</b>	<b>4,167</b>	<b>0</b>	<b>6,606</b>		
<b>NEIGHBORHOOD HIGH DENSITY RESIDENTIAL GENERAL PLAN DESIGNATION</b>											
8474002004	0	no address	0.49	General Urban (D)	54		19		19	Parking lot	0.12
8474002005	1502	WEST COVINA PKWY	0.80	General Urban (D)	54	32			32	Office Building	2.81
8474002013	1540	WEST COVINA PKWY	0.87	General Urban (D)	54	35			35	Gym - 24 hour fitness	0.66
8474002014	1495	WEST COVINA PKWY	1.17	General Urban (D)	54	47			47	Medical Office Building	4.48
8474002015	1501	CAMERON AVE	5.57	General Urban (D)	54	225			225	Medical Office Building	0.67
8474002019	1500	WEST COVINA PKWY	1.53	General Urban (D)	54	61			61	Medical Office Building	0.76
8474009001	310	VINCENT AVE	1.01	General Urban (D)	54	40			40	Carwash	0.49
8474009003	421	GLENDORA AVE	0.47	General Urban (D)	54		19		19	Office Building	0.84
8474009005	811	WEST COVINA PKWY	0.14	General Urban (D)	54		5		5	Florist	0.75
8474009008	330	VINCENT AVE	0.33	General Urban (D)	54		13		13	Retail Building	0.47
8474009009	0	no address	0.98	General Urban (D)	54	39			39	Vacant Lot - Application submitted for MF 30 units	0.01
8474009010	401	GLENDORA AVE	0.68	General Urban (D)	54	27			27	Bank	0.55
8474009011	415	GLENDORA AVE	0.48	General Urban (D)	54		19		19	Office Building	0.49
8474011040	265	GLENDORA AVE	4.10	General Urban (D)	54	166			166	Lakes Entertainment Center	5.00
8474011043	1240	LAKES DR	0.39	General Urban (D)	54		15		15	Lakes Entertainment Center	1.12
8474011047	1230	LAKES DR	0.72	General Urban (D)	54	29			29	Lakes Entertainment Center	2.89

APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
8474011943	1000	LAKES DR	0.95	General Urban (D)	54	38			38	Office Building at the Lakes	0.00
<b>Subtotals</b>			<b>20.68</b>			<b>739</b>	<b>90</b>	<b>0</b>	<b>829</b>		
<b>NEIGHBORHOOD MEDIUM DENSITY RESIDENTIAL GENERAL PLAN DESIGNATION</b>											
8468007040	725	ORANGE AVE	1.69	General Urban (D)	20		25		25	Doctors Hospital	0.04
8468015025	1740	CAMERON AVE	0.13	General Urban (D)	20		1		1	Cameron Office Park	2.71
8468015026	1750	CAMERON AVE	0.12	General Urban (D)	20		1		1	Cameron Office Park	2.66
8468015027	1760	CAMERON AVE	0.13	General Urban (D)	20		1		1	Cameron Office Park	2.71
8468015028	1730	CAMERON AVE	0.14	General Urban (D)	20		2		2	Cameron Office Park	10.3 2
8468015029	1710	CAMERON AVE	0.14	General Urban (D)	20		2		2	Cameron Office Park	5.04
8468015030	1720	CAMERON AVE	0.14	General Urban (D)	20		2		2	Cameron Office Park	5.14
8468015031	1700	CAMERON AVE	0.14	General Urban (D)	20		2		2	Cameron Office Park	5.14
8468015032	1700	CAMERON AVE	2.03	General Urban (D)	20		30		30	Cameron Office Park	1.00
8468016009	1520	CAMERON AVE	1.62	General Urban (D)	20		24		24	Office Building	0.58
8474002010	767	SUNSET AVE	1.28	General Urban (D)	20		19		19	Office Building	0.61
8475007020	537	GLENDORA AVE	0.47	General Urban (D)	20		7		7	Dry cleaners	2.04
8475007028	437	GLENDORA AVE	0.33	General Urban (D)	20		4		4	Fast food restaurant - El Loco	0.19
8475007030	504	VINCENT AVE	0.21	General Urban (D)	20		3		3	Retail	0.11
8475007031	444	GLENDORA AVE	0.59	General Urban (D)	20		8		8	Tire shop	1.82
8475007036	501	VINCENT AVE	4.85	General Urban (D)	20		72		72	Retail center	1.55
8475007039	440	VINCENT AVE	0.41	General Urban (D)	20		6		6	Fast food restaurant - Del Taco	1.01
8475007042	555	GLENDORA AVE	0.62	General Urban (D)	20		9		9	Fast food restaurant - KFC	0.35

APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
8475007043	533	GLENDORA AVE	0.65	General Urban (D)	20		9		9	Restaurant - Sakura	1.64
8476008011	126	GLENDORA AVE	0.87	General Urban (D)	20		13		13	Dental office	0.59
8476008014	104	GLENDORA AVE	0.18	General Urban (D)	20		2		2	Real Estate Office	5.67
8476009034	212	GLENDORA AVE	0.17	General Urban (D)	20		2		2	Retail - Glendora Shoppes	1.07
8476009035	210	GLENDORA AVE	0.11	General Urban (D)	20		1		1	Retail - Glendora Shoppes	1.26
8476009036	202	GLENDORA AVE	0.35	General Urban (D)	20		5		5	Retail - Glendora Shoppes	0.54
8476009037	202	GLENDORA AVE	0.07	General Urban (D)	20		1		1	Parking lot	0.00
8476009038	150	GLENDORA AVE	0.13	General Urban (D)	20		1		1	Retail - Glendora Shoppes	1.36
8476009039	148	GLENDORA AVE	0.06	General Urban (D)	20		0		0	Retail - Glendora Shoppes	1.42
8476009040	144	GLENDORA AVE	0.07	General Urban (D)	20		1		1	Retail - Glendora Shoppes	0.73
8476009041	142	GLENDORA AVE	0.07	General Urban (D)	20		1		1	Retail - Glendora Shoppes	1.43
8476009042	140	GLENDORA AVE	0.11	General Urban (D)	20		1		1	Retail - Glendora Shoppes	0.78
8476009043	136	GLENDORA AVE	0.08	General Urban (D)	20		1		1	Retail - Glendora Shoppes	2.57
8476011036	322	GLENDORA AVE	0.09	General Urban (D)	20		1		1	Retail - Glendora Shoppes	1.67
8476011037	314	GLENDORA AVE	0.11	General Urban (D)	20		1		1	Retail - Glendora Shoppes	1.14
8476011038	312	GLENDORA AVE	0.11	General Urban (D)	20		1		1	Retail - Glendora Shoppes	0.95
8476011039	266	GLENDORA AVE	0.13	General Urban (D)	20		1		1	Retail - Glendora Shoppes	1.01
8476011040	260	GLENDORA AVE	0.12	General Urban (D)	20		1		1	Retail - Glendora Shoppes	1.71
8476011041	250	GLENDORA AVE	0.07	General Urban (D)	20		1		1	Retail - Glendora Shoppes	1.00
8476011042	240	GLENDORA AVE	0.11	General Urban (D)	20		1		1	Retail - Glendora Shoppes	0.52

APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
8476011043	230	GLENDORA AVE	0.20	General Urban (D)	20		3		3	Retail - Glendora Shoppes	0.00
8476011044	220	GLENDORA AVE	0.26	General Urban (D)	20		3		3	Retail - Glendora Shoppes	0.70
8476012019	360	GLENDORA AVE	0.52	General Urban (D)	20		7		7	Retail - Glendora Shoppes	1.31
8476012022	328	GLENDORA AVE	0.24	General Urban (D)	20		3		3	Fastfood restaurant	3.22
8476022019	400	GLENDORA AVE	0.61	General Urban (D)	20		9		9	Fastfood restaurant	1.25
8476024003	510	GLENDORA AVE	1.27	General Urban (D)	20		19		19	Glendora Plaza	1.00
8476024004	546	GLENDORA AVE	0.08	General Urban (D)	20		1		1	Parking Lot for Office Building	0.00
8476024005	550	GLENDORA AVE	0.32	General Urban (D)	20		4		4	Office Building	1.73
8476024013	450	GLENDORA AVE	2.25	General Urban (D)	20		33		33	Glendora Plaza	0.62
8442018020	635	AZUSA AVE	2.43	N-C/MUO	20		36		36	Food 4 Less Shopping Center	0.65
8442018021	615	AZUSA AVE	5.58	N-C/MUO	20		83		83	Food 4 Less Shopping Center	1.01
8443017015	1809	DANES DR	0.23	N-C/MUO	20		3		3	Dry Cleaners	0.68
8443017016	610	AZUSA AVE	0.23	N-C/MUO	20		3		3	Retail	1.13
8443018018	530	AZUSA AVE	0.43	N-C/MUO	20		6		6	Retail	1.02
8447019034	100	GRAND AVE	3.54	N-C/MUO	20		53		53	Grand Creek Shopping Center	2.20
8456019025	116	VINCENT AVE	0.65	N-C/MUO	20		9		9	Retail	1.88
8458003009	1413	PUENTE AVE	0.28	N-C/MUO	20		4		4	Market	0.29
8458003011	719	SUNSET AVE	0.22	N-C/MUO	20		3		3	Retail	0.67
8458018003	639	SUNSET AVE	0.38	N-C/MUO	20		5		5	Retail	0.18
8468007043	1906	GARVEY AVE S	0.79	N-C/MUO	20		11		11	Office Building	0.67
8469005001	1319	MERCED AVE	0.28	N-C/MUO	20		4		4	Retail	0.59
8469015024	803	GLENDORA AVE	0.40	N-C/MUO	20		6		6	Restaurant - Johnny Shrimp Boat	0.12
8469015027	811	GLENDORA AVE	0.46	N-C/MUO	20		6		6	Retail	2.12
8469020001	1031	GLENDORA AVE	0.22	N-C/MUO	20		3		3	Retail	1.06
8469020004	1101	GLENDORA AVE	0.26	N-C/MUO	20		3		3	Office	1.99
8469020005	1107	GLENDORA AVE	0.35	N-C/MUO	20		5		5	Office	1.50
8469020011	1043	GLENDORA AVE	0.31	N-C/MUO	20		4		4	Office	1.50



APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
8469020014	1035	GLENDORA AVE	0.21	N-C/MUO	20		3		3	Office	0.94
8469020018	1131	GLENDORA AVE	0.49	N-C/MUO	20		7		7	Retail	0.53
8469020019	1129	GLENDORA AVE	0.18	N-C/MUO	20		2		2	Dental office	1.07
8469020021	1129	GLENDORA AVE	0.07	N-C/MUO	20		1		1	Retail	0.61
8487017032	525	VINE AVE	0.34	N-C/MUO	20		5		5	retail	2.51
8487017033	543	VINE AVE	0.22	N-C/MUO	20		3		3	office	1.48
8487017041	551	VINE AVE	0.33	N-C/MUO	20		4		4	retail	0.48
8487017043	956	GLENDORA AVE	0.17	N-C/MUO	20		2		2	Fastfood Restaurant - King Torta	0.90
8488001006	1120	GLENDORA AVE	0.54	N-C/MUO	20		8		8	Office	1.32
8488001007	409	MERCED AVE	0.28	N-C/MUO	20		4		4	Office	0.39
8488001008	417	MERCED AVE	0.21	N-C/MUO	20		3		3	Office	0.53
8488002001	522	VINE AVE	0.56	N-C/MUO	20		8		8	Office	0.62
8488002003	1008	GLENDORA AVE	0.19	N-C/MUO	20		2		2	Office	0.33
8488002004	1014	GLENDORA AVE	0.17	N-C/MUO	20		2		2	Office	1.22
8488002026	1104	WESCOVE PL	0.54	N-C/MUO	20		8		8	Office	2.27
8488019030	1200	GLENDORA AVE	0.43	N-C/MUO	20		6		6	Office	0.99
8469015001	905	GLENDORA AVE	0.26	O-P/MUO	20		3		3	Office	1.53
8469015002	909	GLENDORA AVE	0.20	O-P/MUO	20		3		3	Office	0.44
8469015003	917	GLENDORA AVE	0.20	O-P/MUO	20		3		3	Single-family residential	0.38
8469019001	933	GLENDORA AVE	1.26	O-P/MUO	20		18		18	West Covina Employment Development Department	1.91
8470032016	820	MERCED AVE	0.30	O-P/MUO	20		4		4	Dental office	0.78
8470032017	830	MERCED AVE	0.80	O-P/MUO	20		12		12	Kindergarten	0.67
8487017042	555	VINE AVE	0.31	O-P/MUO	20		4		4	Residential Home	0.84
8488001002	1105	WESCOVE PL	0.17	O-P/MUO	20		2		2	Residential Home	0.01
8488001003	1101	WESCOVE PL	0.17	O-P/MUO	20		2		2	Boutique -retail	0.01
8488002005	1018	GLENDORA AVE	0.17	O-P/MUO	20		2		2	tarot Card reader	0.43
8488002006	1024	GLENDORA AVE	0.16	O-P/MUO	20		2		2	Dental office	1.91
8488002007	1030	GLENDORA AVE	0.17	O-P/MUO	20		2		2	Empty Lot	0.00
8488002009	1038	GLENDORA AVE	0.17	O-P/MUO	20		2		2	Medical office/dentist	1.21
8488002010	1038	GLENDORA AVE	0.16	O-P/MUO	20		2		2	Medical office/ dentist	1.79
8488019022	421	MERCED AVE	0.56	O-P/MUO	20		8		8	Medical Office Building	0.44

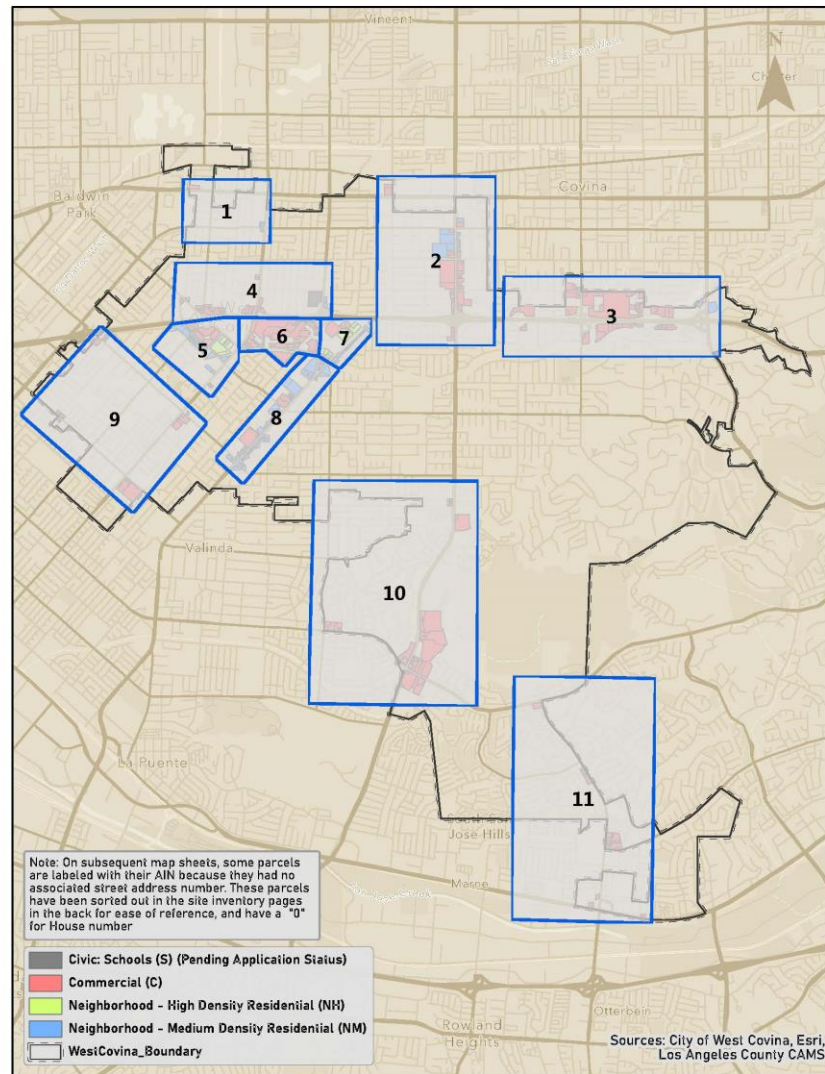
APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
8488019031	1210	GLENDORA AVE	0.97	O-P/MUO	20		14		14		0.86
8442018016	563	AZUSA AVE	2.13	S-C/MUO	20		31		31		0.89
8443003018	730	AZUSA AVE	1.18	S-C/MUO	20		17		17		0.72
8443017001	616	AZUSA AVE	0.23	S-C/MUO	20		3		3		2.87
8443018019	542	AZUSA AVE	0.18	S-C/MUO	20		2		2		2.51
8443018020	542	AZUSA AVE	0.21	S-C/MUO	20		3		3		0.00
8443020033	1809	ECKERMAN AVE	0.22	S-C/MUO	20		3		3		0.70
8443020034	620	AZUSA AVE	0.24	S-C/MUO	20		3		3	Service Retail - Salon	0.85
8451015045	125	FAIRWAY LN	0.98	S-C/MUO	20		14		14	Restaurant - Misky Misky	1.75
8469015026	824	CAMERON AVE	1.78	S-C/MUO	20		26		26	Retirement Home - Country View	8.29
8469015028	821	GLENDORA AVE	1.94	S-C/MUO	20		29		29	Retail - Auto Sales	0.26
8469015029	853	GLENDORA AVE	0.47	S-C/MUO	20		7		7	Restaurants - Domino's & Honeybaked	0.92
8469015031	823	GLENDORA AVE	0.17	S-C/MUO	20		2		2	Retail	3.59
8469015032	829	GLENDORA AVE	0.17	S-C/MUO	20		2		2	Retail	3.60
8469015033	835	GLENDORA AVE	0.17	S-C/MUO	20		2		2	Retail & Restaurant - Don Lencho's Mexico	3.62
8469015034	841	GLENDORA AVE	0.17	S-C/MUO	20		2		2	Retail	0.93
8469015035	847	GLENDORA AVE	0.17	S-C/MUO	20		2		2	Retail	0.93
8470032018	1203	GLENDORA AVE	0.51	S-C/MUO	20		7		7	Retail & Restaurants	1.14
8475007038	835	CHRISTOPHER ST	0.72	S-C/MUO	20		10		10	Retail	1.15
8475007041	837	CHRISTOPHER ST	0.70	S-C/MUO	20		10		10	Retail	1.38
8475009018	675	GLENDORA AVE	5.22	S-C/MUO	20		78		78	Retail - Bowlero	0.25
8475009019	901	SERVICE AVE	2.39	S-C/MUO	20		35		35	Storage Facility	2.26
8476022030	420	GLENDORA AVE	0.79	S-C/MUO	20		11		11	Health Center	37.09
8487017038	936	GLENDORA AVE	0.83	S-C/MUO	20		12		12	Service Retail - Auto	0.83
8487017040	950	GLENDORA AVE	0.06	S-C/MUO	20		0		0	Retail	1.45
8488002024	1000	GLENDORA AVE	0.29	S-C/MUO	20		4		4	Retail	0.27
8468016904	811	SUNSET AVE	1.00	Urban Neighborhood (D)	20		15		15	Office	0.00
8468016904	811	SUNSET AVE	0.40	Urban Neighborhood (D)	20		6		6	Office	0.00
8480016033	2646	E. GARVENUE AVE S	3.53	C-2/MUO	20		52		52	Shopping Center- McIntyre Square	0.44

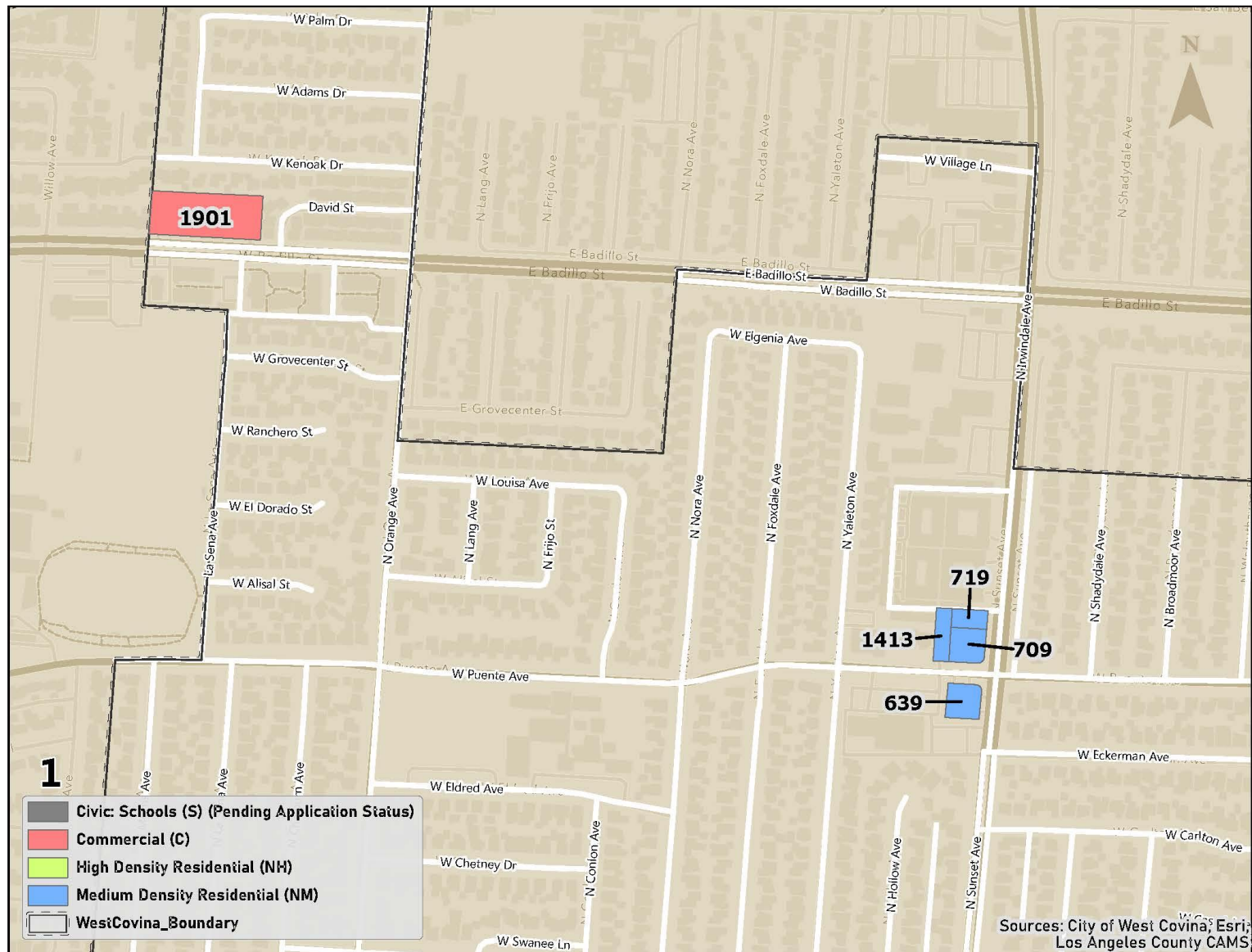
APN	Street No.	Street Address	Acres	Zoning	Allowed Density	Lower	Mod	Above Mod	Total Units	Existing Use	I/L
8480016032	2646	E. GARVENUE AVE S	0.15	C-2/MUO	20				2	Shopping Center- McIntyre Square	0.00
8480016002	200	CITRUS ST	2.63	C-2/MUO	20		39		39	Shopping Center-McIntyre Square	0.92
8468016904	811	SUNSET AVE	8.29	Urban Neighborhood	20				124	The City Yard - City Property SLA	0.00
8453015031	2500	WORKMAN AVE	2.53	S-C/MUO	20				37	Citrus Grove Shopping Center	1.75
8453015006	235	CITRUS ST	0.39	S-C/MUO	20				5	Citrus Grove Shopping Center	0.53
8458020901	1501	DEL NORTE ST	13.59	R-1	9				91	School Site - Surplus	0.00
<b>Subtotals</b>			<b>79.30</b>			<b>0</b>	<b>1,170</b>	<b>0</b>	<b>1,429</b>		
<b>GRAND TOTALS</b>						<b>3,090</b>	<b>5,427</b>	<b>0</b>	<b>8,864</b>		

Notes:

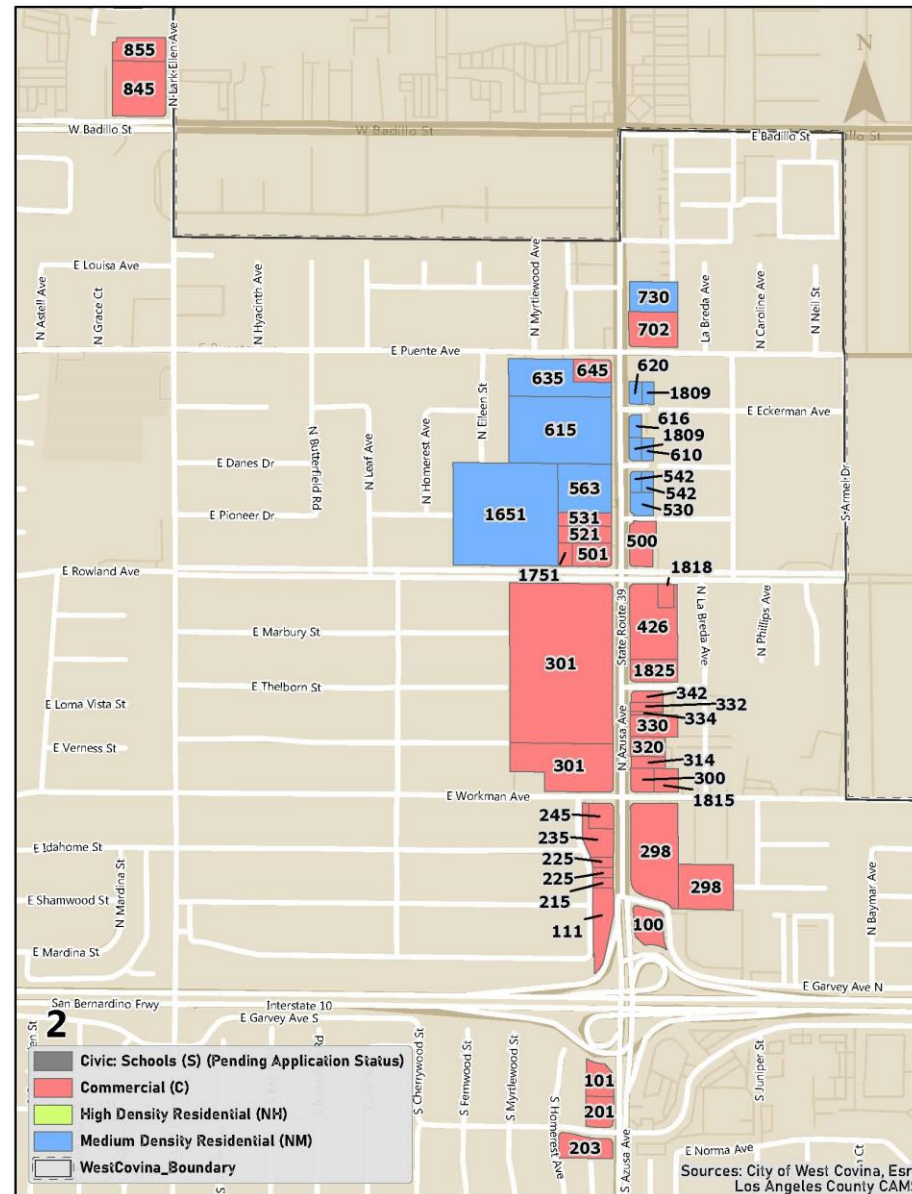
\* Site listed in the prior Housing Element

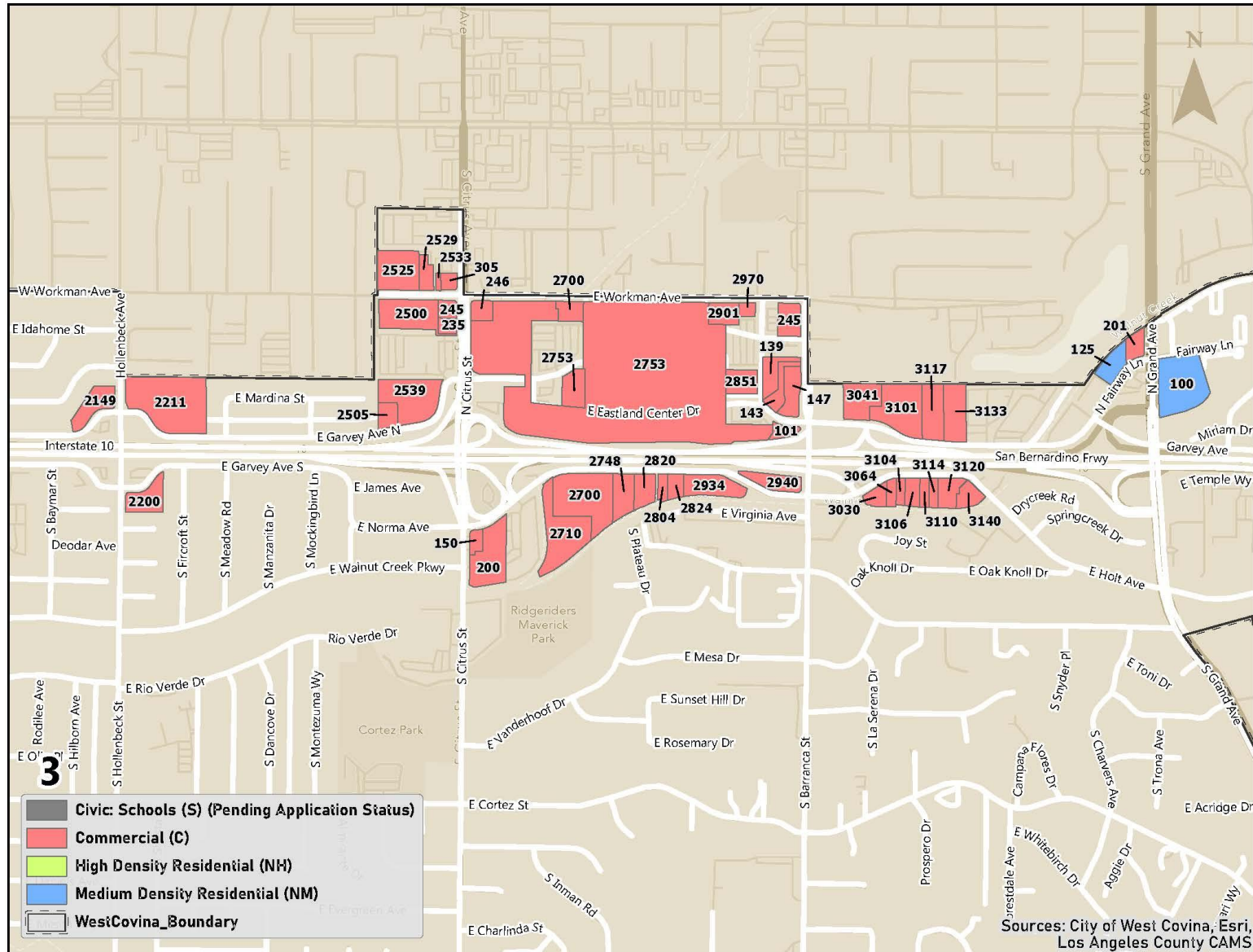
**Figure B-2**  
**Sites Inventory Maps**





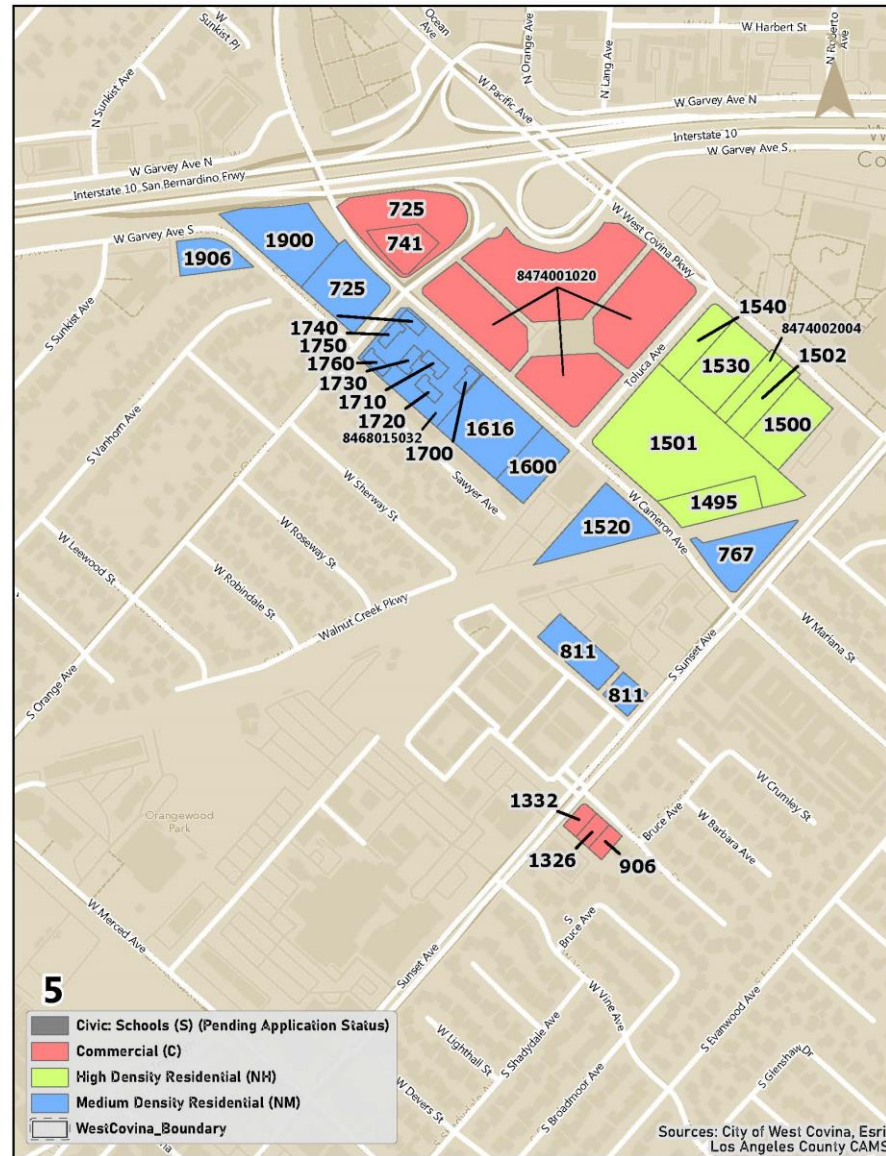


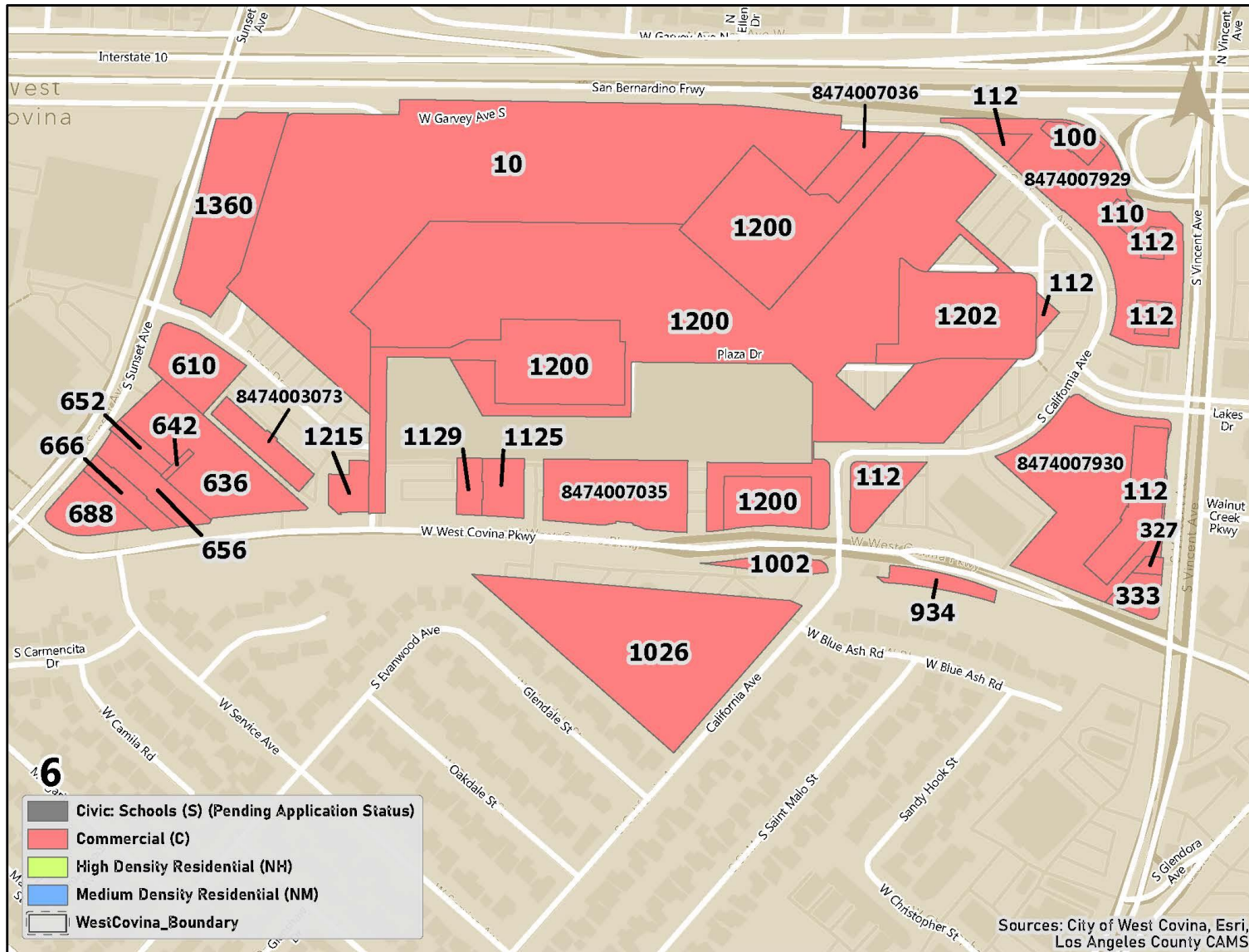


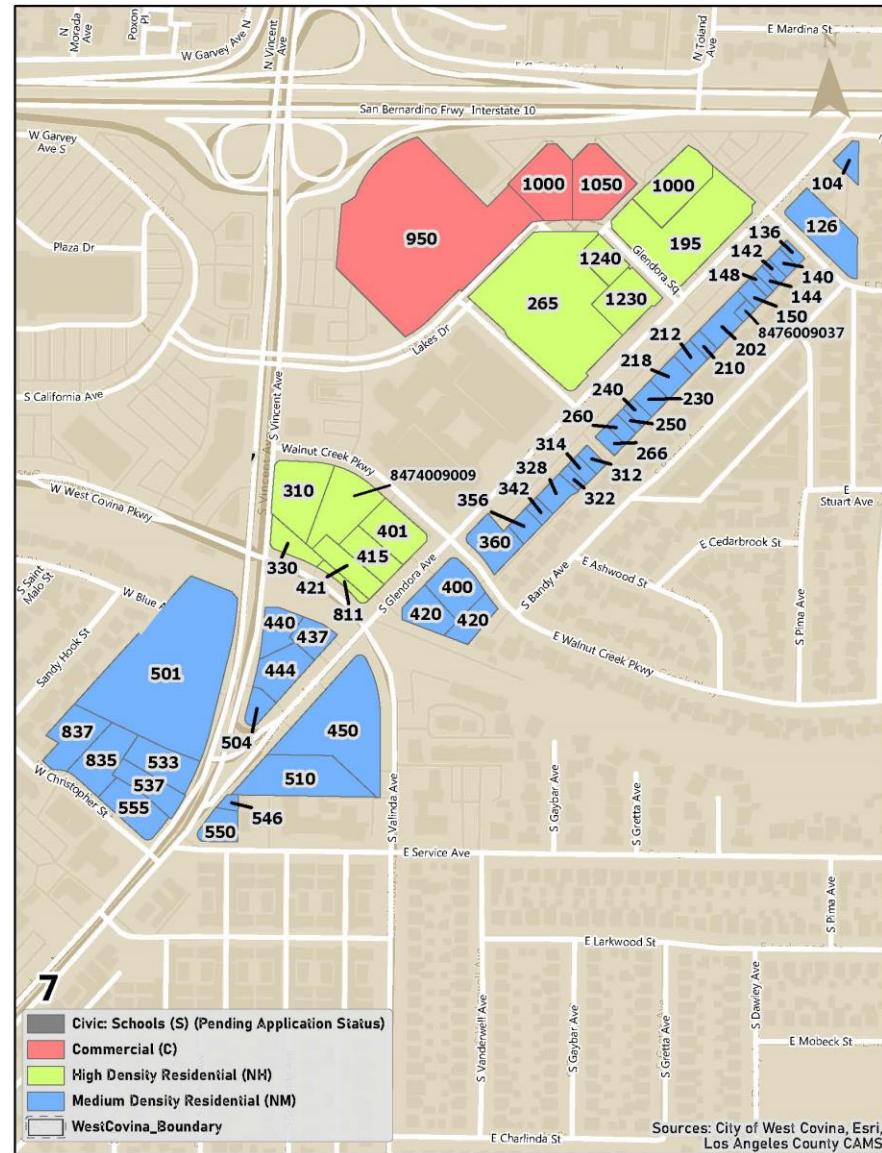




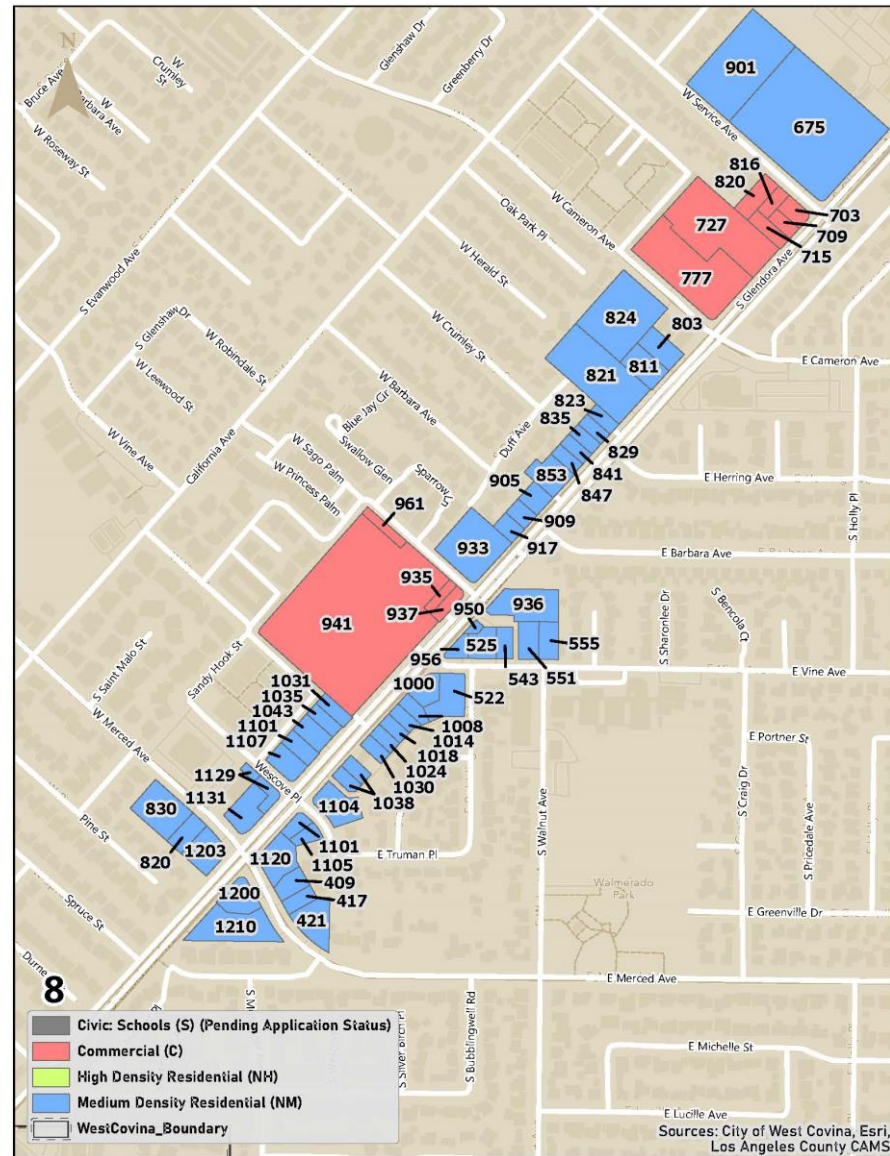


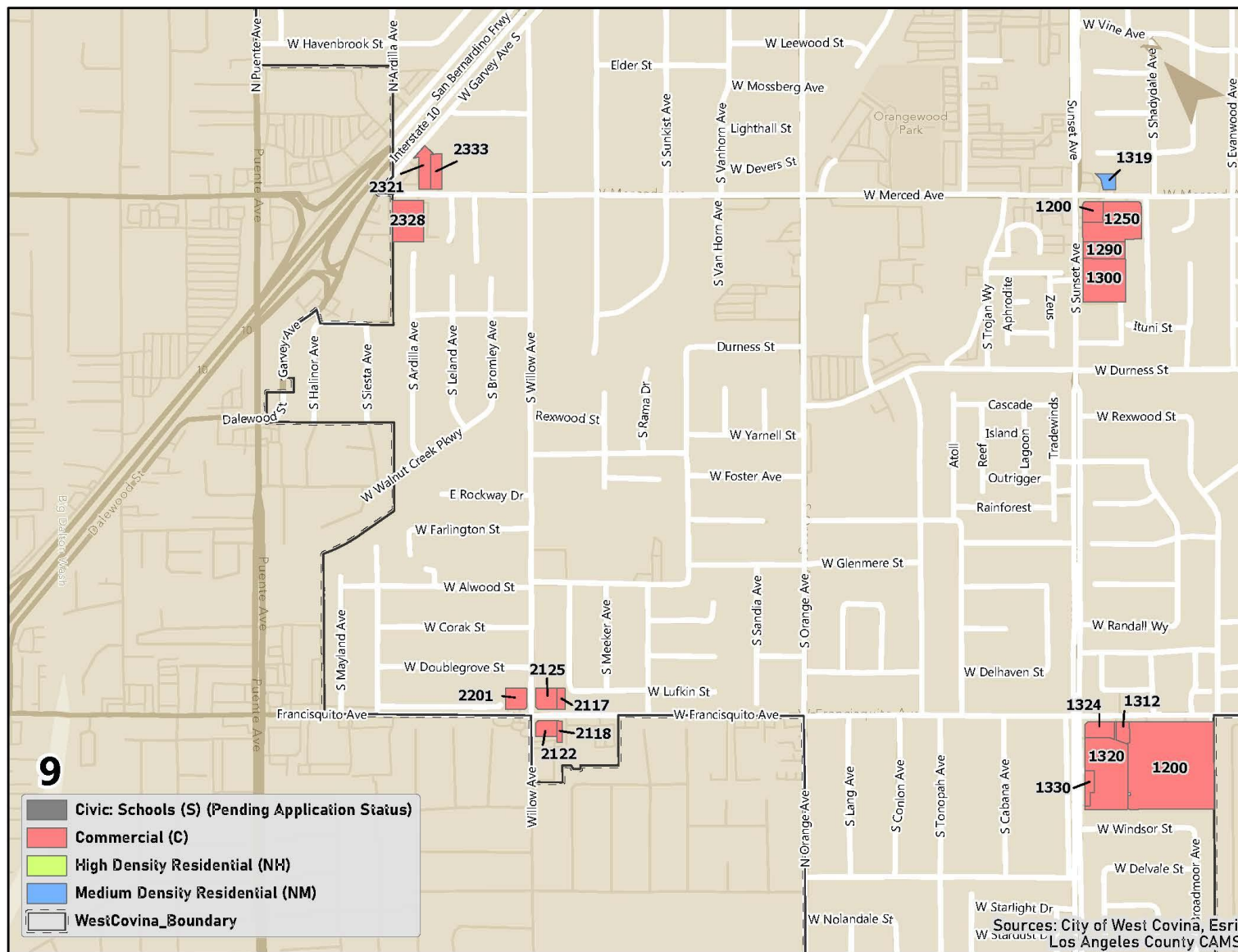


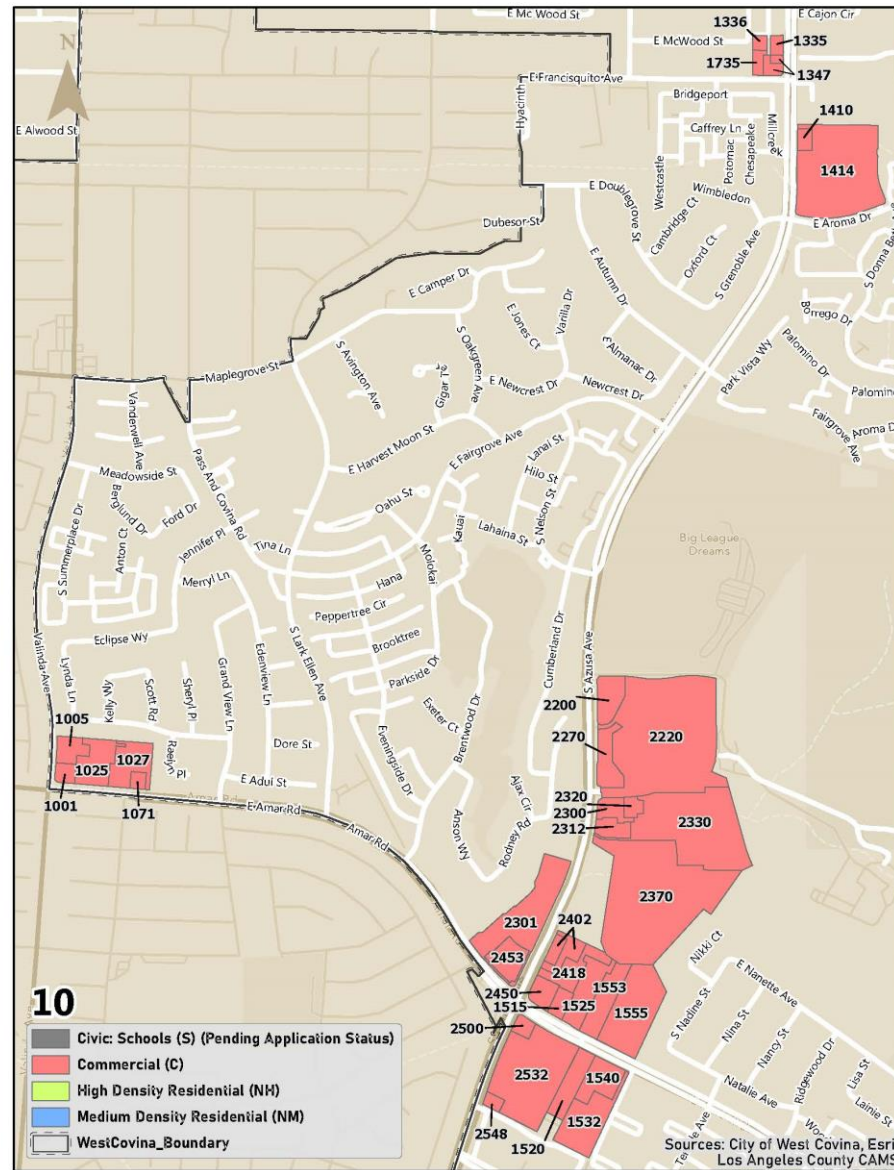




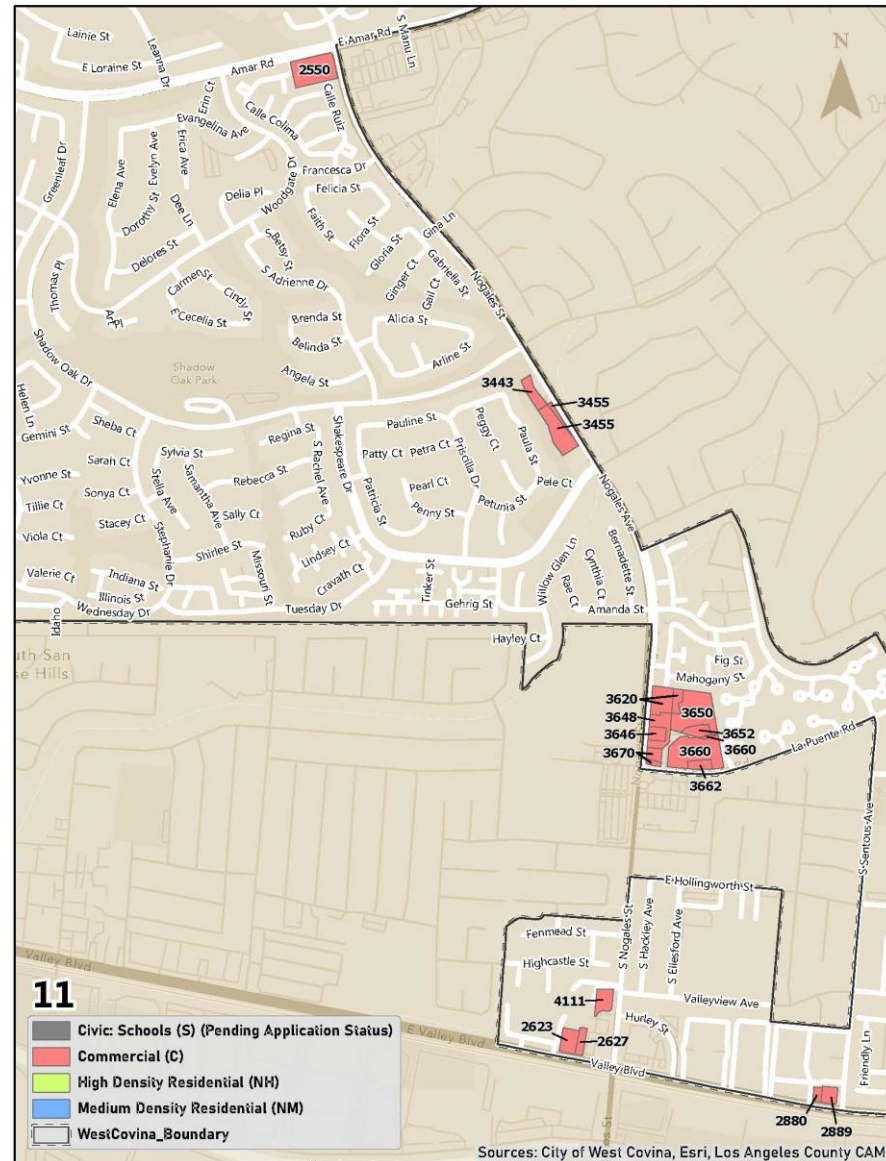












## Appendix C –

# Public Participation

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

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

City residents and other interested parties were given many opportunities to identify housing issues of concern, recommend strategies, review the draft Housing Element, and provide recommendations to decision-makers. A Housing Element web page was established to provide interested persons with information including meeting notices, agendas, staff reports, Frequently Asked Questions (provided below) and other reference materials. 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	Town Hall meeting
February 8, 2022	Planning Commission meeting
March 1, 2022	City Council meeting
May 24, 2022	Town Hall meeting
October 11, 2022	Planning Commission public hearing
TBD	City Council public hearing

Prior to each public meeting, notices were posted on the City's website and also sent directly to each organization and person on the stakeholder list either by email or U.S. mail, or both. Notification was also published in the local newspaper in advance of the public



hearings. Copies of the draft Housing Element were made available for review at City Hall and were posted on the City website, and notices were sent directly to housing interest groups and organizations that serve the City's special needs populations (see Table C-1).

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

Organization	Address	City
Housing Authority of Los Angeles County	700 West Main Street	Alhambra
Baldwin Park Housing Authority	14403 Pacific Avenue	Baldwin Park
San Gabriel/Pomona Regional Center	761 Corporate Center Dr	Pomona
Southern California Housing Rights Center	520 S. Virgil Avenue, Suite 400	Los Angeles
Human Services Association	6800 Florence Ave.	Bell Gardens
L.A. County Public Social Services	12860 Crossroads Parkway South	Industry
Lamp Community Homeless Drop In Ctr	627 San Julian Street	Los Angeles
Los Angeles Mission	303 East 5 <sup>th</sup> Street	Los Angeles
TELACU Development Corporation	5400 E Olympic Blvd.	Commerce
Habitat for Humanity	2111 Bonita Avenue	La Verne
Mercy Housing California	1500 S. Grand Avenue, Suite 100	Los Angeles
BRIDGE Housing Corporation	19200 Von Karmen Avenue	Irvine
LINC Housing	110 Pine Avenue, Suite 500	Long Beach
So. Calif. Association of Nonprofit Housing	501 Shatto Place, Suite 403	Los Angeles
Abode Communities	701 East 3 <sup>rd</sup> Street, Suite 400	Los Angeles
California Housing Partnership Corporation	800 S. Figueroa Street, Suite 760	Los Angeles
Shelter Partnership	523 W. 6 <sup>th</sup> 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

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.

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

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

Comment	How this Comment was Addressed in the Housing Element
Development should not permanently displace current residents. Housing replacement programs, temporary housing vouchers, right of return, and demolition controls will create stability for renters while allowing new homes to be built for new households and to accommodate the growth associated with RHNA. In your sites inventory and rezoning programs, you should prioritize development on sites with owner-occupied housing & commercial uses over those with existing rent-controlled apartments or other rental housing with lower income residents.	As noted in Appendix B (Sites Inventory) very few of the sites identified for future housing development are occupied by residential uses; therefore, minimal displacement of existing residents will occur. In rare instances where existing housing units could be displaced, appropriate provisions will be required consistent with State law..
The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.	The Housing Element supports home ownership through first-time homebuyer programs as well as through the expansion of housing and mixed-use development opportunities.
Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity. This density should be emphasized around jobs and transit and should go beyond the Mullin density in those areas.	As described in the Constraints analysis and Appendix B (Sites Inventory), development standards such as height and FAR are appropriate to facilitate development at the densities assumed in the sites inventory.
Allow residential to be built in areas that are zoned for commercial use.	As described in Appendix B (Sites Inventory) the Mixed Use Overlay zone allows higher-density residential development in areas currently zoned only for non-residential use.



## Frequently Asked Questions 2021 Housing Element Update

### 1. What is a Housing Element?

State 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.*

## City of West Covina

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## 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)



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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.scaq.ca.gov/programs/pages/housing.aspx>

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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)



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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
Projected need:	504,970 units
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

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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

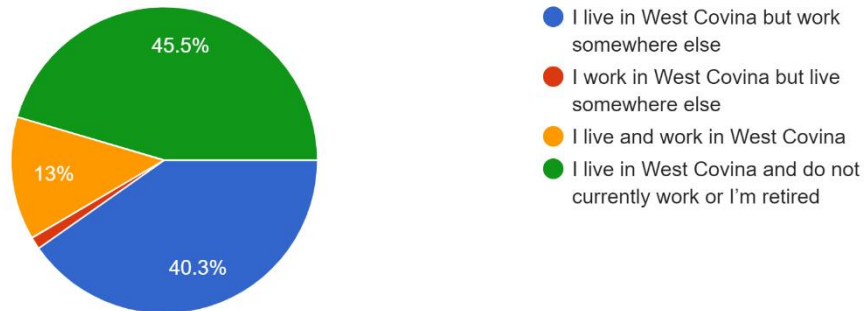
<sup>12</sup> California Government Code Sec. 65589.3.

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

## Online Housing Survey Results

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

77 responses



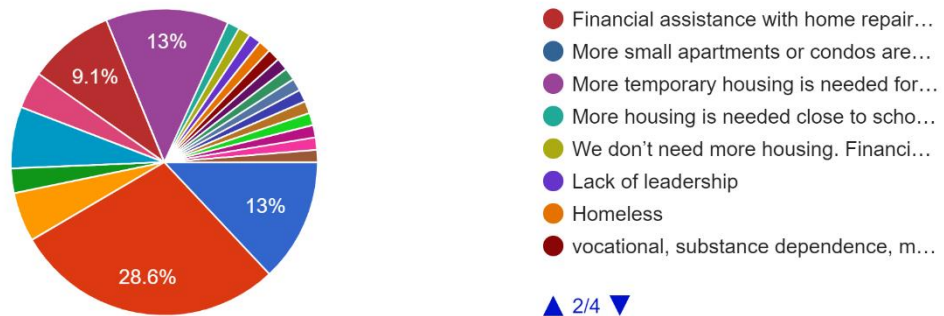
What do you consider to be the most pressing housing problems in West Covina?

77 responses



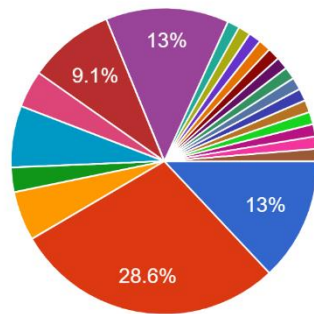
What do you consider to be the most pressing housing problems in West Covina?

77 responses



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

77 responses

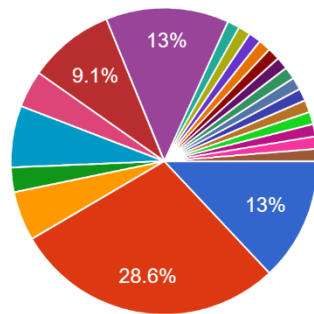


- Too many homeless people on streets
- Homeless people at parks and public...
- State legislation not allowing the City t...
- High Density Housing is destroying th...
- Stop all these illegal garage conversio...
- Safety/ homelessness issues need to...
- vocational , health and resource for di...
-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

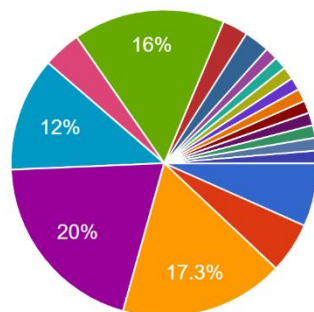


- Two: low & middle income housing is unavailable/unattainable; homeless need homes-public health concern

▲ 4/4 ▼

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

75 responses

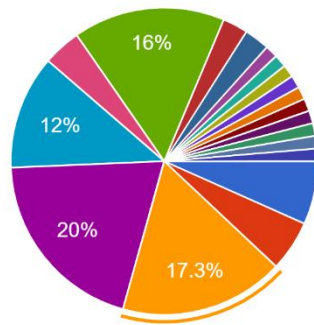


- Close to my workplace
- Housing quality
- Attractive neighborhoods
- Local recreational amenities
- Close to family and/or friends
- Good housing value
- Quality of local schools
- Neighborhood safety

▲ 1/3 ▼

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

75 responses

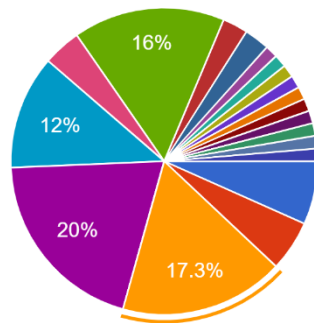


- City services, facilities and programs
- Proximity to shopping and services
- I came here to claim my piece of subu...
- Grew up here
- Long time resident when a great com...
- no choice
- I was raised in West Covina and later...
- I've lived here my entire life (45yrs)

▲ 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 ▼





# Appendix D – Fair Housing Assessment

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

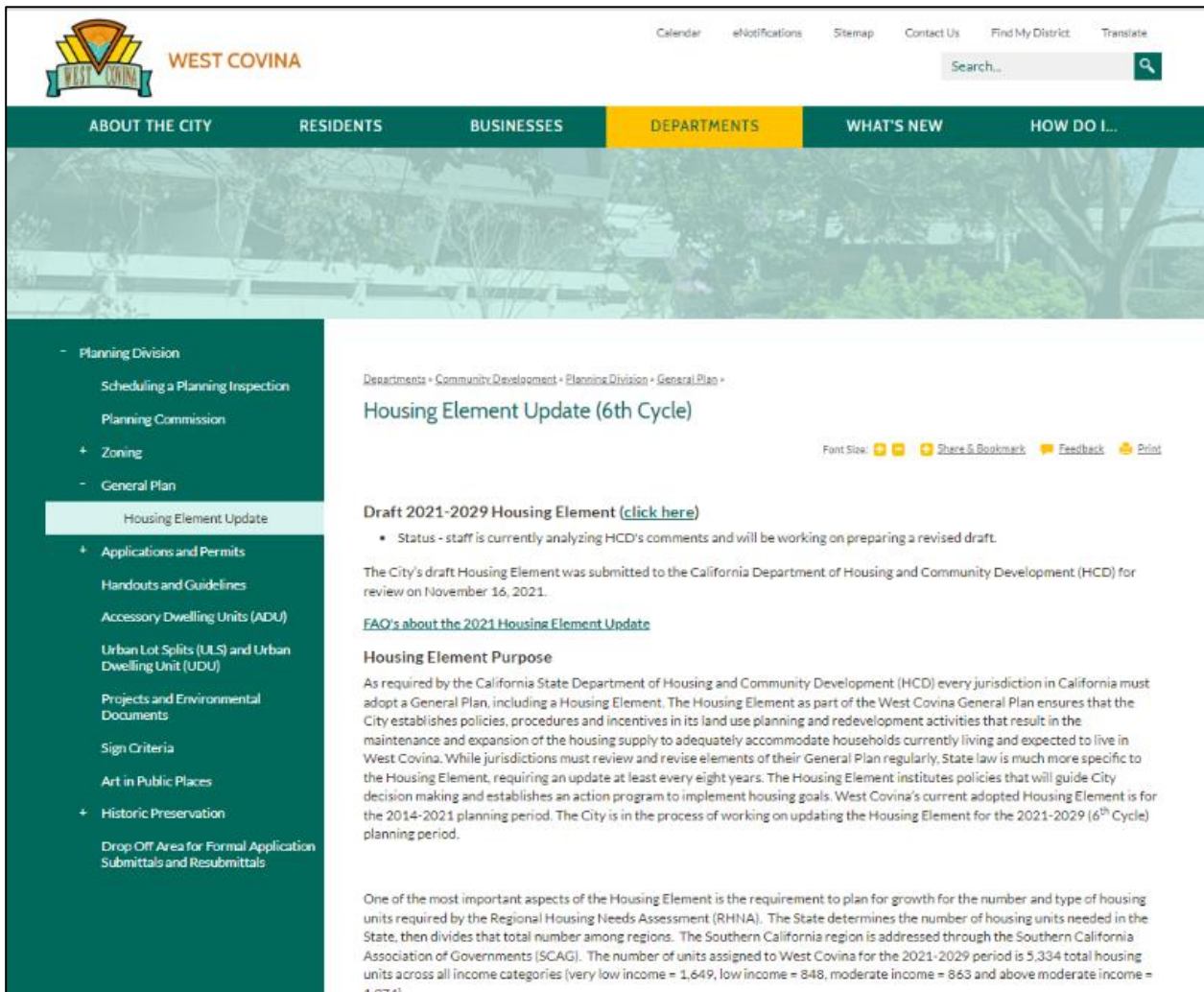
- **Inclusive and Equitable Outreach:** A summary of fair housing outreach and capacity that includes all economic segments of the community.
- **Assessment of Fair Housing:** An assessment of fair housing issues, including integration and segregation patterns, racially or ethnically concentrated areas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

## 1. Outreach

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

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

Element. All notices and other information posted on the website was available in multiple languages.



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

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

## 2. Fair Housing Assessment

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



## **A. Fair Housing Enforcement and Outreach Capacity**

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

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

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

During the most recent reporting period for the 2020-2021 fiscal year, the HRC provided assistance to 66 West Covina residents, 11 of which were related to housing discrimination and 55 were for other housing issues. HRC noted that of the 11 discrimination inquiries, 9 were related to physical disability and 2 were related to national origin. HRC opened investigations for 3 of these matters, one of which was successfully conciliated, with the other 2 closed when the clients withdrew their complaints. Of the 55 residents with general housing questions, the greatest number addressed notices/evictions (25.5%), seeking housing (21.8%), and rent increases (12.7%). Most of those residents served (97%) were of low to extremely-low income and 51.5% reported their ethnicity as Hispanic/Latino.

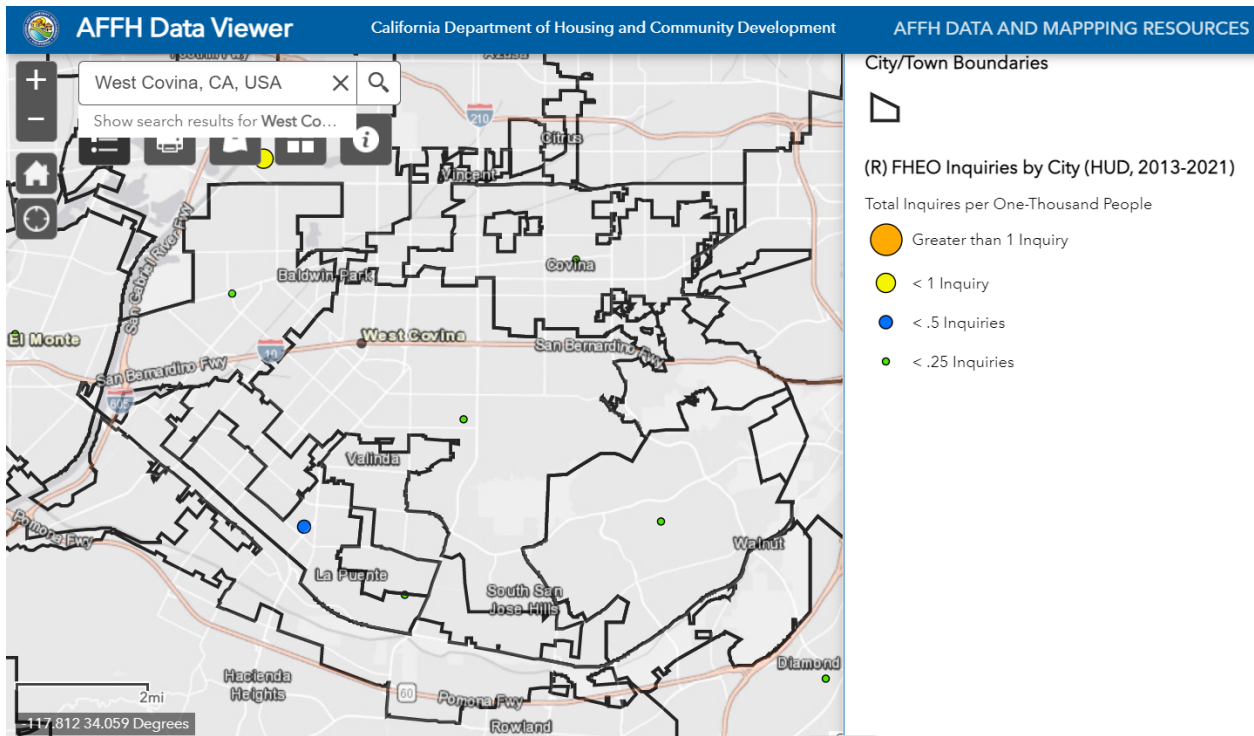
The City does not have any pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights.

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

Program 4.1 is included in the Housing Plan (Chapter 2) to continue to ensure that fair housing information and links to service providers are available through the City's website, as well as the City's promotion and distribution of fair housing and anti-displacement resources to residents, especially those at-risk of displacement.

As seen in Figure D-1, the HCD AFFH Data Viewer reported a Fair Housing Enforcement and Outreach (FHEO) inquiry rate of less than 0.25 per 1,000 persons for the 2013-2021 period in West Covina.

**Figure D-1**  
**FHEO Inquiries – West Covina**



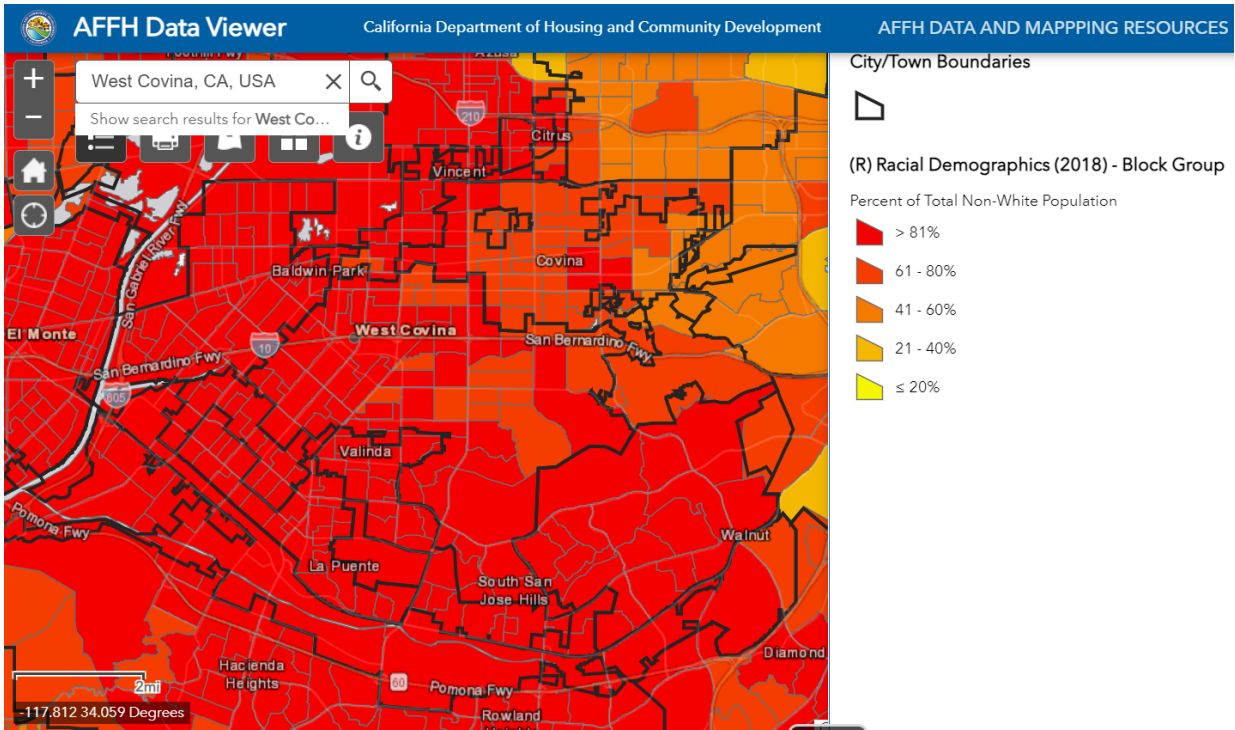
The Constraints section (Chapter 4) of this Housing Element describes ways that the City works to address potential impediments to fair housing choice. The City continues to work cooperatively with the HRC to implement the regional Fair Housing Plan (AI) and to offer fair housing services and tenant/landlord counseling to residents.

## **B. Patterns of Integration and Segregation**

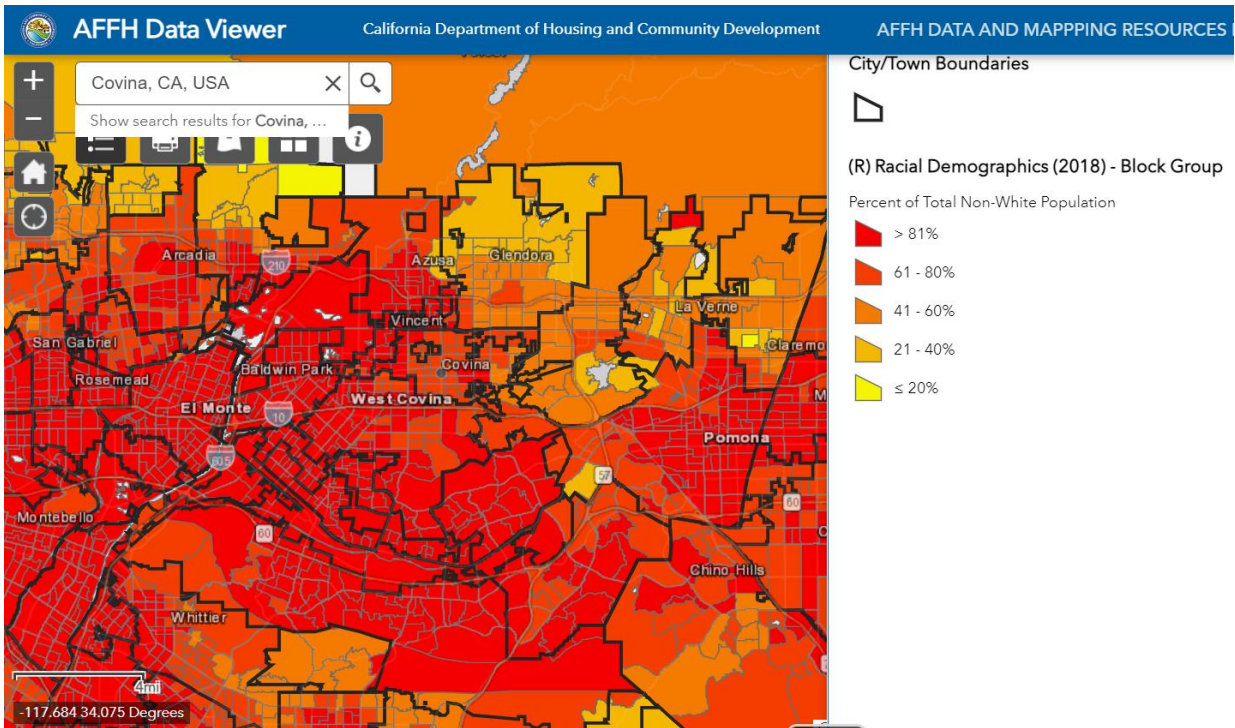
### **1) Race and Ethnicity**

As seen in Figure D-2, the percentage of non-White population is more than 60% in most areas of West Covina and is similar to the adjacent cities. The non-White percentage is slightly lower (41%-60%) in the eastern portion of the city, which is similar to the adjacent unincorporated County area. Racial characteristics for the larger San Gabriel Valley area are illustrated in Figure D-3. These maps indicate that there are no significant non-White population concentrations in West Covina.

**Figure D-2**  
**Racial Demographics – West Covina**



**Figure D-3**  
**Racial Demographics – San Gabriel Valley Area**

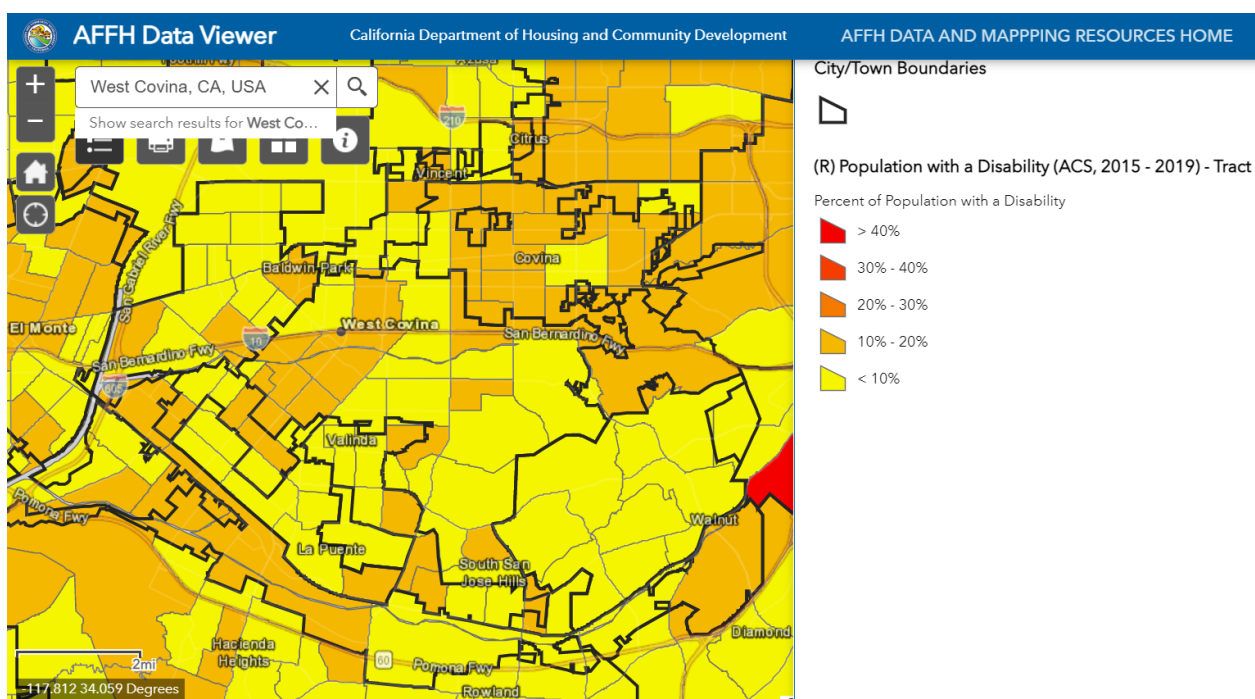


## 2) Persons with Disabilities

As shown on Figure D-4, estimated disability rates in all areas of West Covina are less than 20%, although some census tracts show disability rates less than 10%.

Additional information regarding persons with disabilities by disability type in West Covina is provided in Figure 3-18 and Figure 3-19 of the Housing Needs Assessment. Some individuals may experience more than one disability, and some disability types are not recorded for children below a certain age. Based upon California Department of Developmental Services (DDS) data, SCAG reported that there are approximately 3,202 persons with developmental disabilities within the ZIP code areas that encompass the City of West Covina.

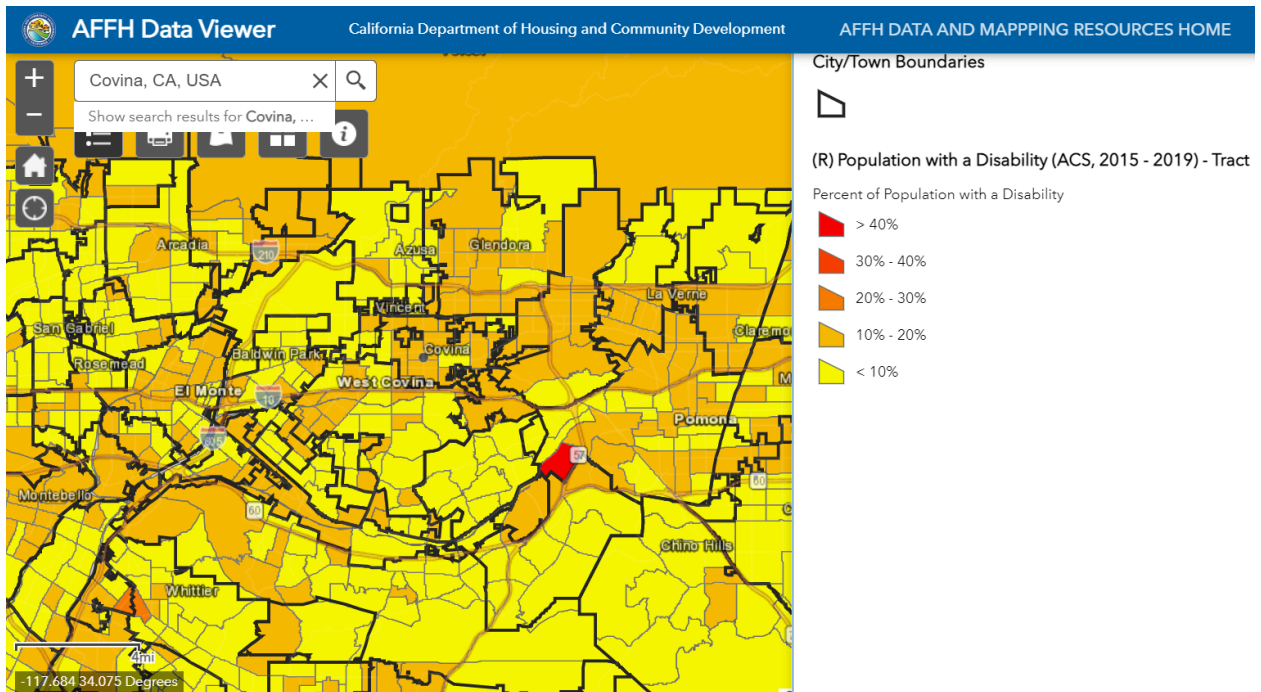
**Figure D-4**  
**Population with a Disability – West Covina**





Disability data for the larger San Gabriel Valley area are shown in Figure D-5. This map shows that disability rates in West Covina are generally similar to the region as a whole.

**Figure D-5**  
**Population with a Disability – San Gabriel Valley Area**



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

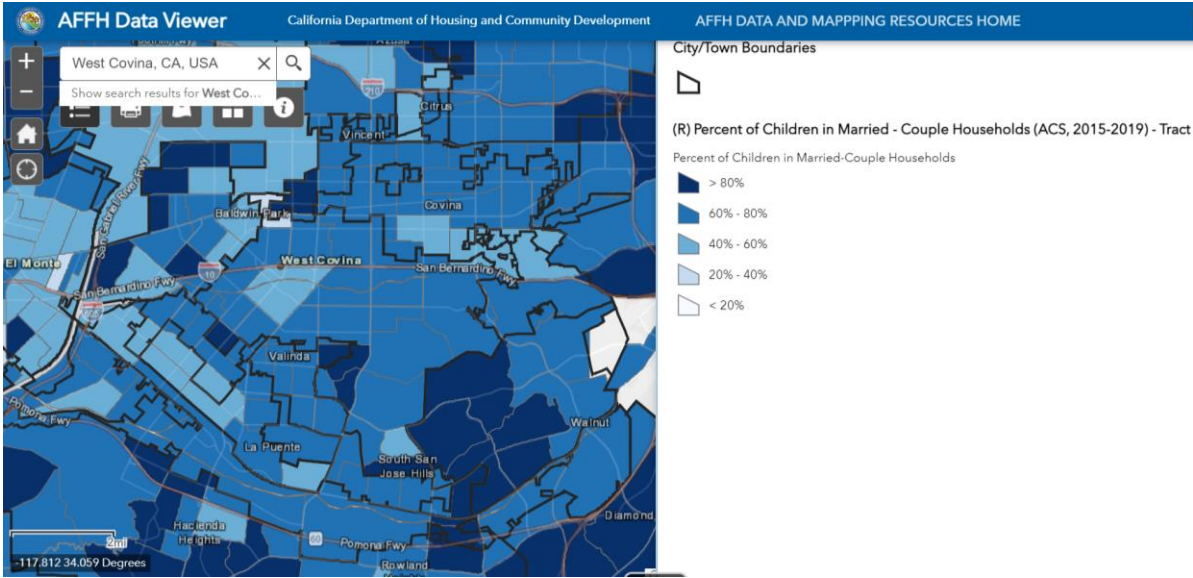
### 3) Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns.

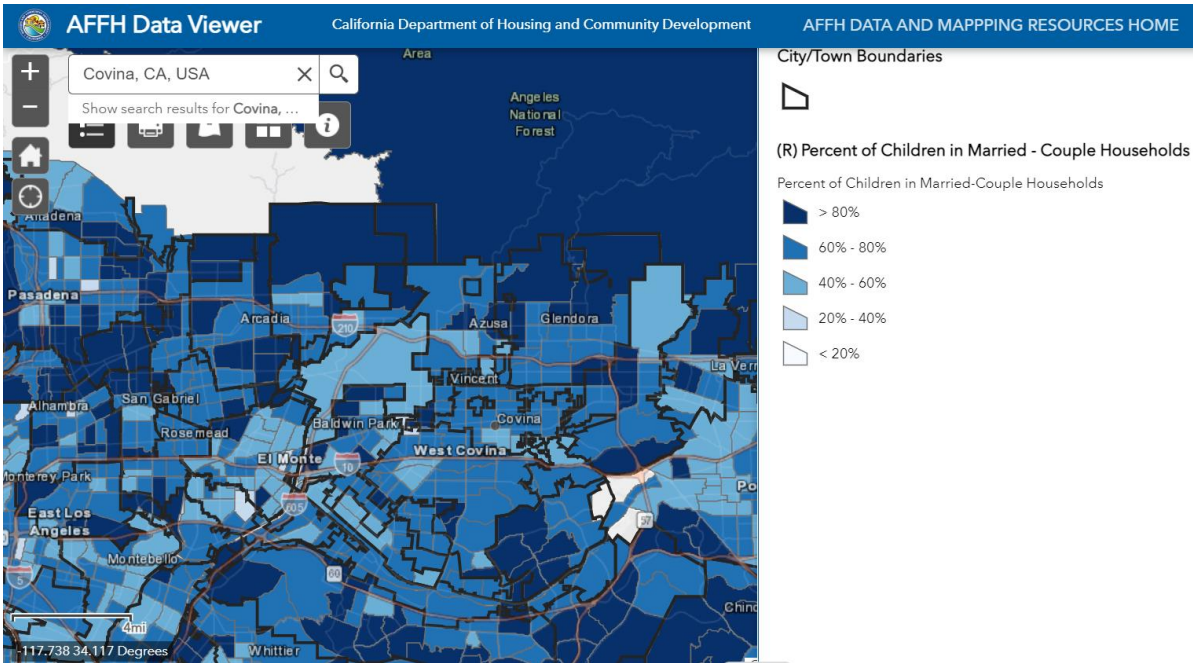
Single-parent households are also protected by fair housing law. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other

supportive services. As discussed in Section 3.7.3 of the Housing Needs Assessment, about 16.3% 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). Figure D-6 shows the percentage of children living in married couple households in West Covina while Figure D-7 shows similar data for the San Gabriel Valley region as a whole.

**Figure D-6**  
**Percentage of Children in Married Couple Households – West Covina**



**Figure D-7**  
**Percentage of Children in Married Couple Households – San Gabriel Valley Area**

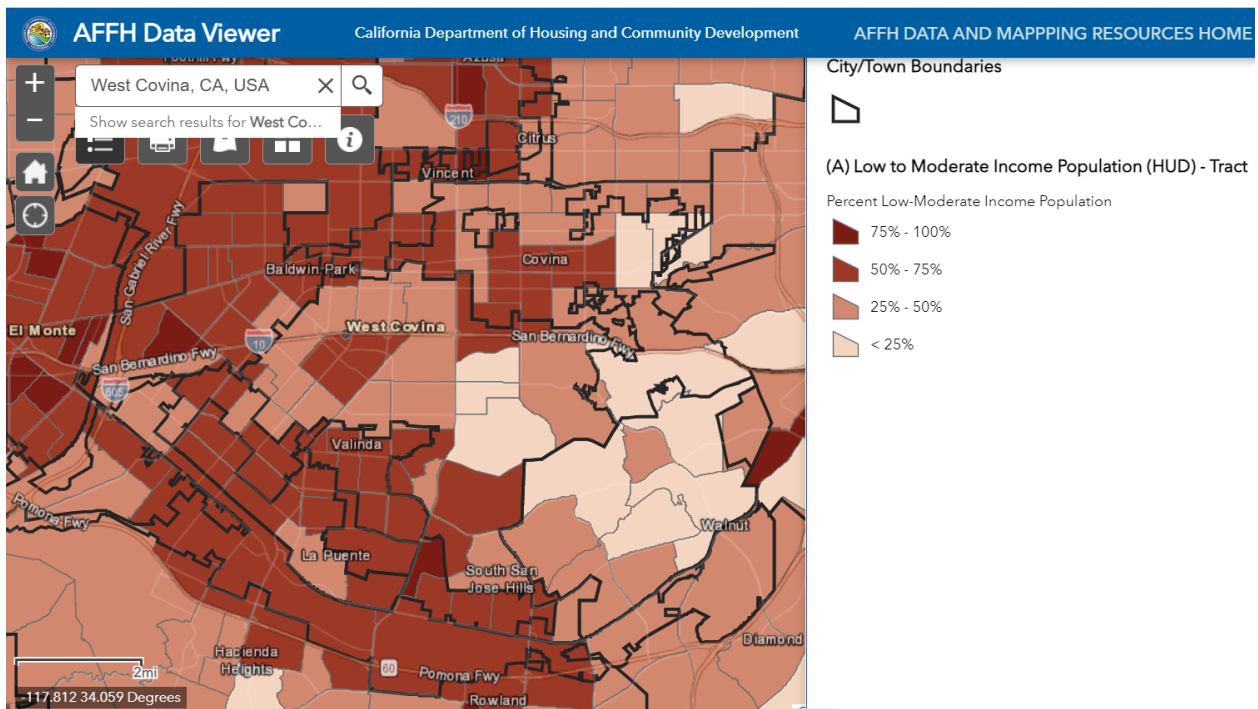


#### 4) Income

Identifying low/moderate-income (LMI) areas is an important aspect in understanding patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51% of the population is LMI (based on HUD income definition of up to 80% of the AMI). Figure D-8 shows that the percentage of LMI households in most areas West Covina range from 25 to 75%, although a few tracts in the east-central portion of the city show LMI percentages less than 25%. There are no tracts in West Covina with an LMI percentage higher than 75%.

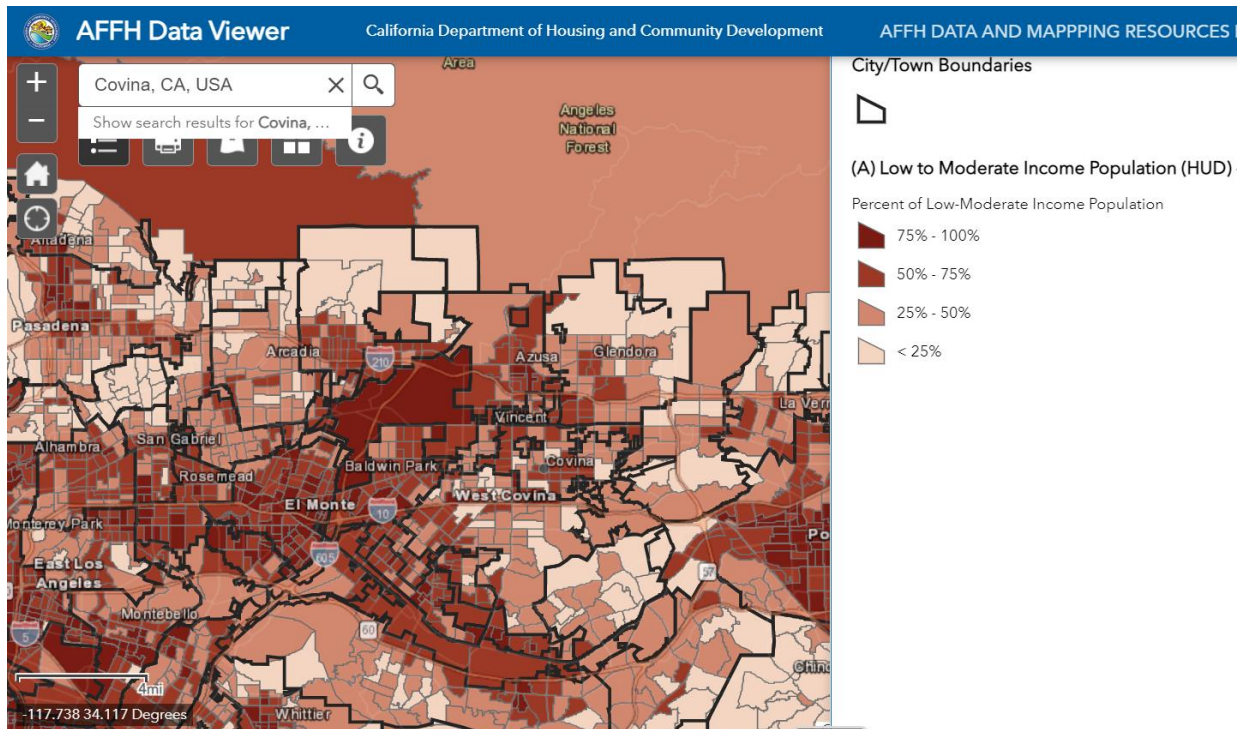
For the larger San Gabriel Valley area, higher LMI concentrations are generally located in the western part of the valley (Figure D-9).

**Figure D-8**  
**Low/Moderate Income Population – West Covina**





**Figure D-9**  
**Low/Moderate Income Population – San Gabriel Valley Area**

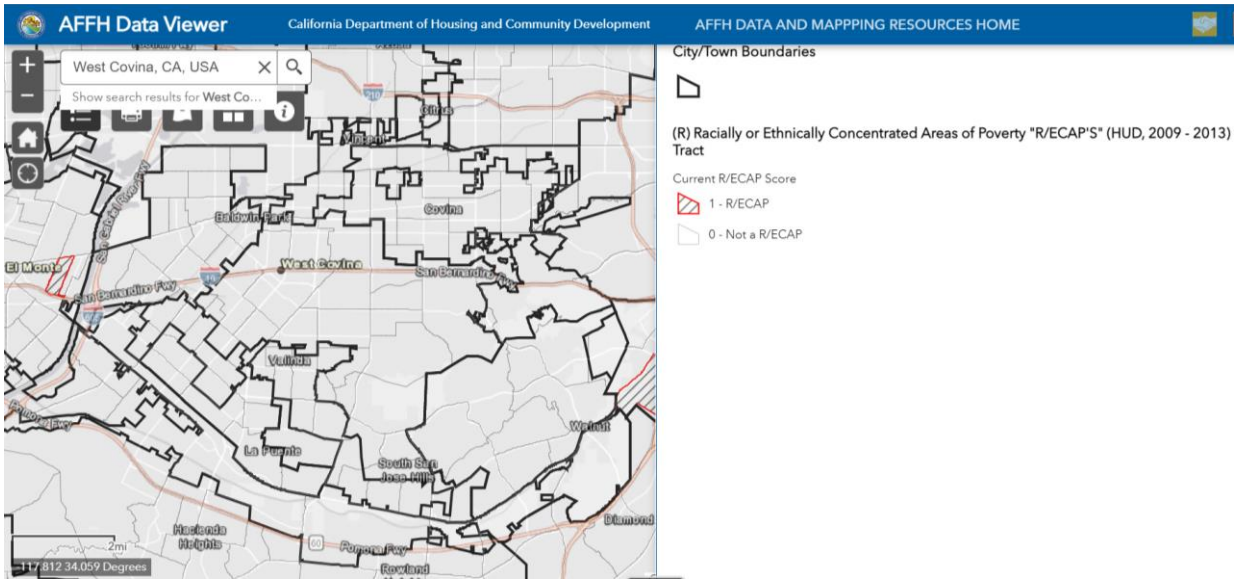


### C. Racially/Ethnically Concentrated Areas

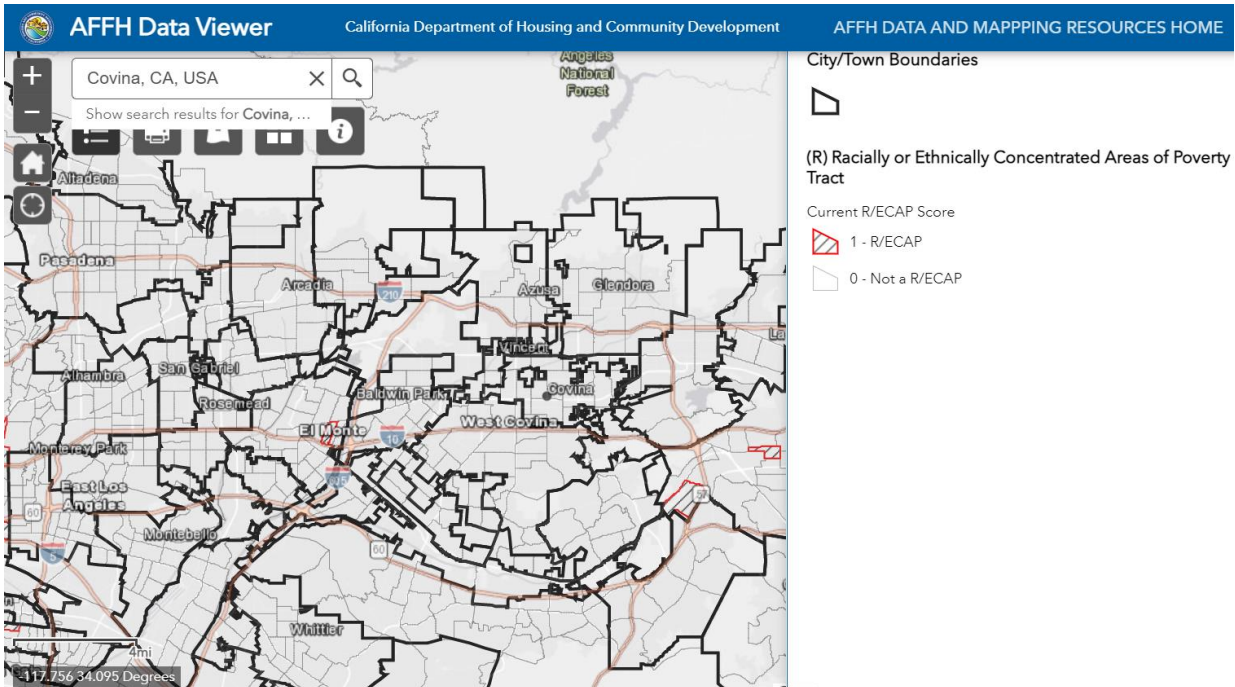
#### 1) Racially/Concentrated Areas of Poverty

According to HUD, a racially or ethnically concentrated area of poverty (R/ECAP) is an area in which 50% or more of the population identifies as non-White and 40% or more of residents are living in poverty. As shown in Figure D-10, there are no designated R/ECAP areas in West Covina. The nearest R/ECAP areas to West Covina are located in El Monte to the west and Pomona to the east (Figure D-11).

**Figure D-10**  
**Racially/Ethnically Concentrated Areas of Poverty – West Covina**

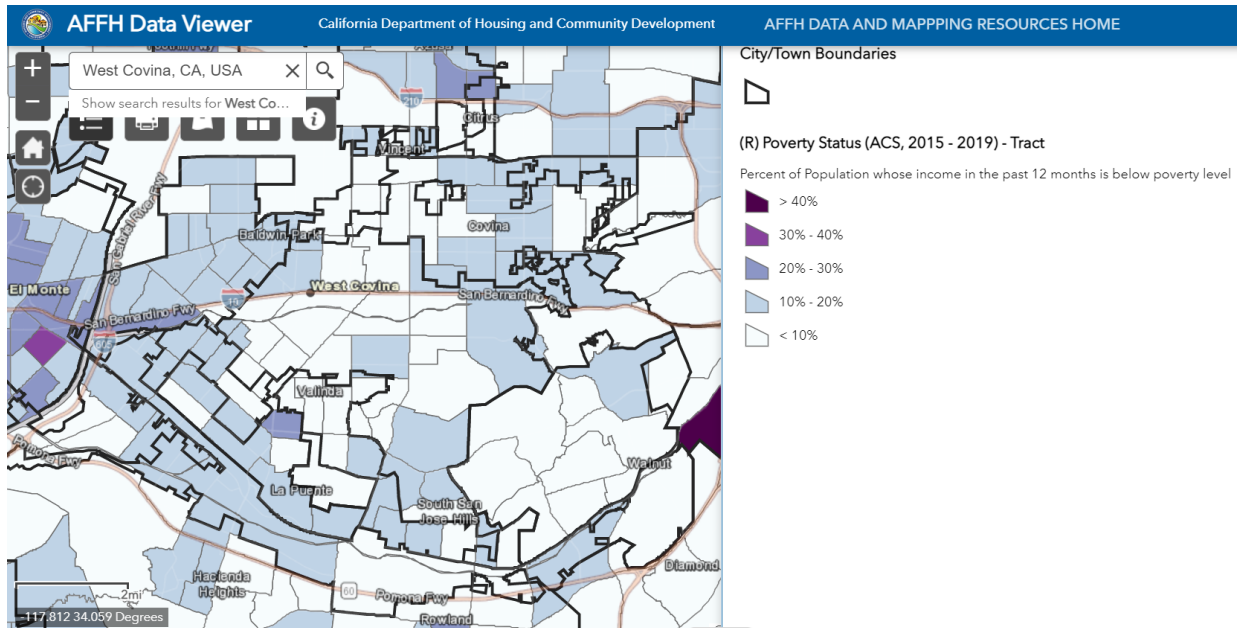


**Figure D-11**  
**Racially/Ethnically Concentrated Areas of Poverty – San Gabriel Valley Area**

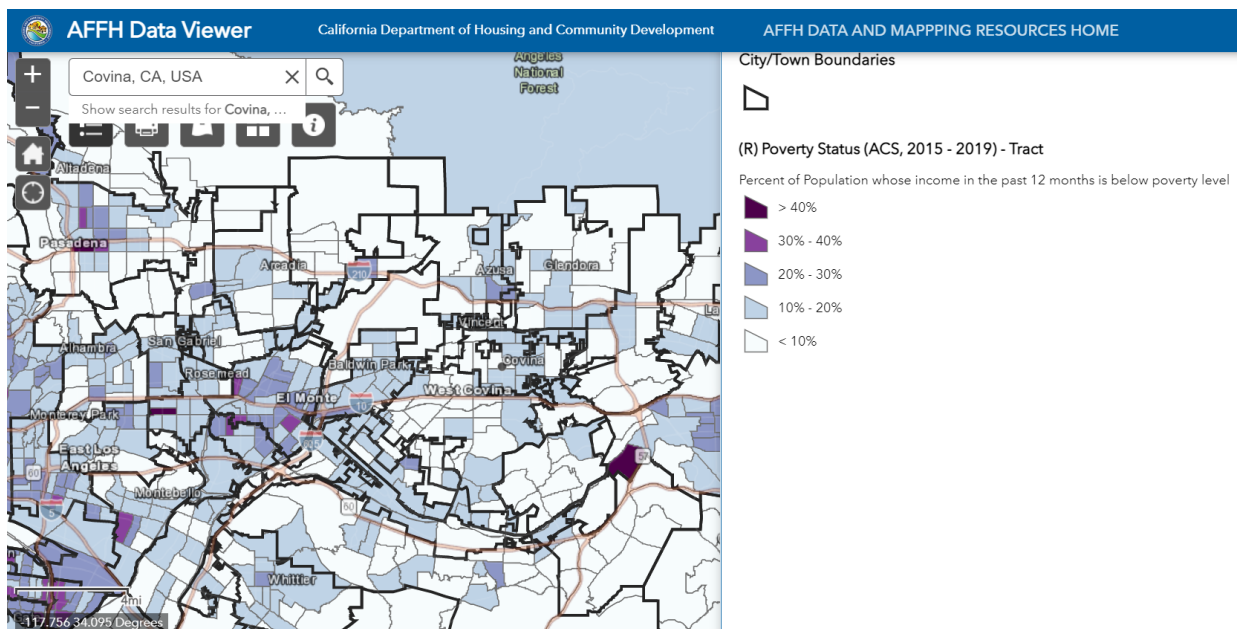


Recent Census estimates regarding poverty status of households in West Covina are shown in Figure D-12. As seen in this map, poverty rates are below 10% in most census tracts, although some areas have poverty rates between 10 and 20%. Figure D-13 shows that poverty rates in West Covina are similar to other areas of the San Gabriel Valley.

**Figure D-12**  
**Poverty Status – West Covina**



**Figure D-13**  
**Poverty Status – San Gabriel Valley Area**



Programs in the Housing Plan that specifically target assistance for households with incomes below the poverty line include 1.2 – Monitor and Preserve Affordable Housing, 2.1 – Acquisition and Rehabilitation, 2.2 – Affordable Housing Financing, 2.4 – Los Angeles County Partnerships, 3.1 – Reduce Development Constraints, 3.2 – Density Bonus, 3.3 – Priority Processing for Affordable and Special Needs Housing, 3.4 – Accessory Dwelling Units, 3.5 – Manufactured Housing and Mobile Home Rent Control, 4.1 – Fair Housing, 4.2 – Reasonable Accommodation for Persons with Disabilities, 4.3 – Senior Center Shared Housing, 4.4 – Homeless Assistance, 4.5 – Housing for Persons with Disabilities, 5.1 – Ensure Adequate Sites to Accommodate the RHNA, and 5.3 – Local Agency Surplus Land for Affordable Housing.

## 2) Racially/Concentrated Areas of Affluence

According to the Housing and Community Development AFFH Guidance Memo, “segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices.” Therefore, both sides of the continuum must be examined. While HCD does not provide a standard definition for RCAAs and the HCD Data Viewer does not currently provide RCAA maps, available data regarding the percentage White population and median household income can provide insight into racially concentrated areas of affluence.

Table D-1 compares the median household incomes of White/non-Hispanic residents in West Covina and Los Angeles County as a whole to the median incomes for the total population of the city and county. This table shows that in West Covina, the median income for non-Hispanic White households is about 7% lower than for the city's population as a whole. Countywide, the median income for non-Hispanic White households is about 28% higher than for the population as a whole. These data suggest that there is much less racial concentration of affluence in West Covina than in Los Angeles County as a whole.

**Table D-1**  
**Median Household Income by Race – West Covina and Los Angeles County**

White Alone (not Hispanic)	\$79,909	\$91,323
All Households	\$85,626	\$71,358

Source: U.S. Census ACS 2016-2020

B19013 (all)

B19013H (white alone, not Hispanic)

## D. Disparities in Access to Opportunity

### 1) Overview

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

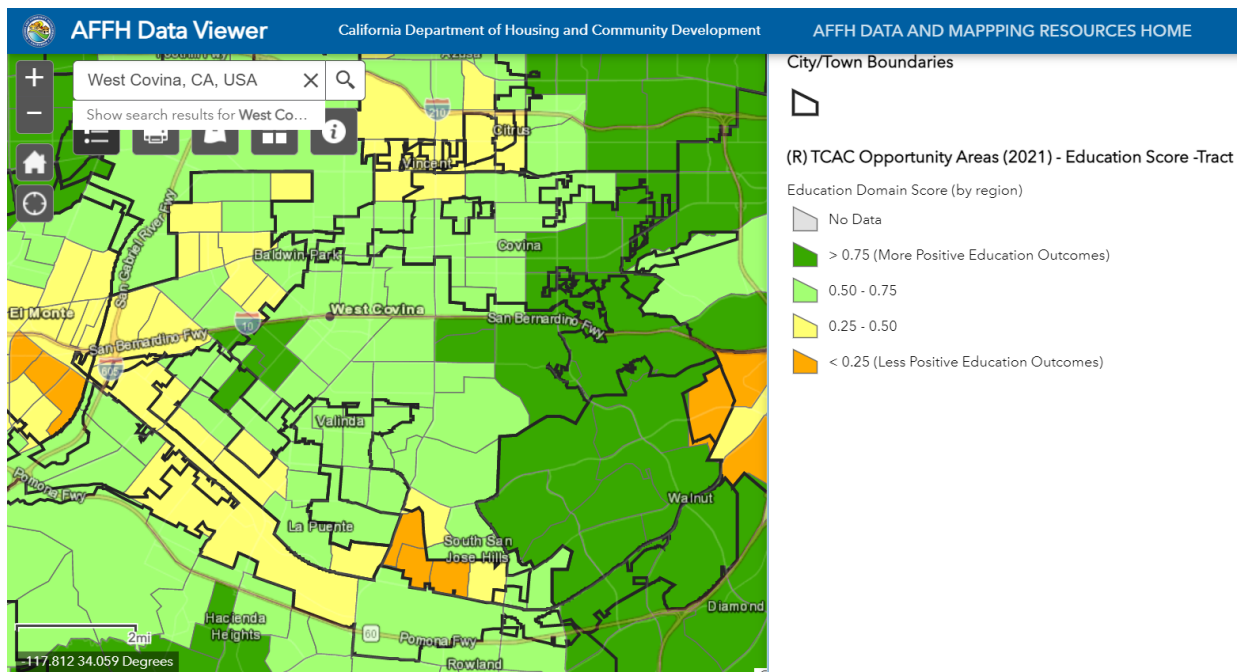


## 2) Educational Opportunity

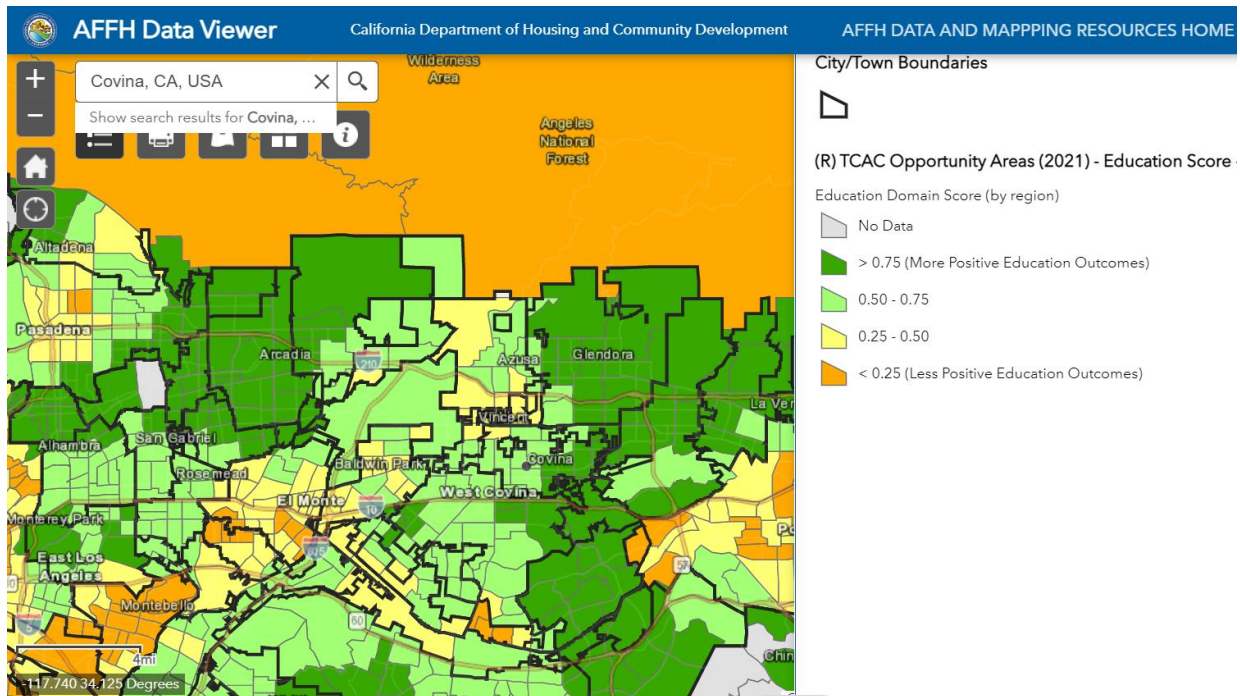
The West Covina Unified School District (WCUSD) serves the majority of West Covina, while Covina-Valley Unified School District also serves portions of the city. As shown in Figure D-14, TCAC educational opportunity scores are highest (>0.75) in the eastern and western portions of the city, while the majority of the city received a score of 0.5 – 0.75). The lowest scores (0.25 – 0.50) were reported in a small area in the far southern portion of the city adjacent to the City of Industry and unincorporated county territory.

The County AI describes overall school proficiency in the Urban County Area in relation to race and ethnicity. White and Asian residents generally have greater access to proficient schools, particularly in Santa Monica and Glendora, while Black and Hispanic residents living in Palmdale, Inglewood, and Montebello lived among schools with the lowest levels of proficiency within the Urban County area. The largest concentrations of low scores are found near Downtown Los Angeles. Figure D-15 shows educational opportunity scores in West Covina in the context of the larger San Gabriel Valley area.

**Figure D-14**  
**TCAC Educational Opportunity Areas – West Covina**



**Figure D-15**  
**TCAC Educational Opportunity Areas – San Gabriel Valley Area**



### 3) Economic Opportunity

Two factors in measuring the Economic Opportunity Score are job proximity and labor market engagement. In West Covina, the highest economic opportunity scores (0.5 - 0.75) are found in the eastern portions of the city (Figure D-16).

The County AI reported that economic opportunity scores for the Urban County area were similar for Whites, Black, and Asian/Pacific Islander while the score for Hispanics was slightly lower. However, labor market engagement index values were significantly higher for Whites and Asian/Pacific Islanders compared to African Americans and Hispanics. Figure D-17 shows economic opportunity scores in West Covina in the context of the larger San Gabriel Valley area.

Figure D-16  
TCAC Economic Opportunity – West Covina

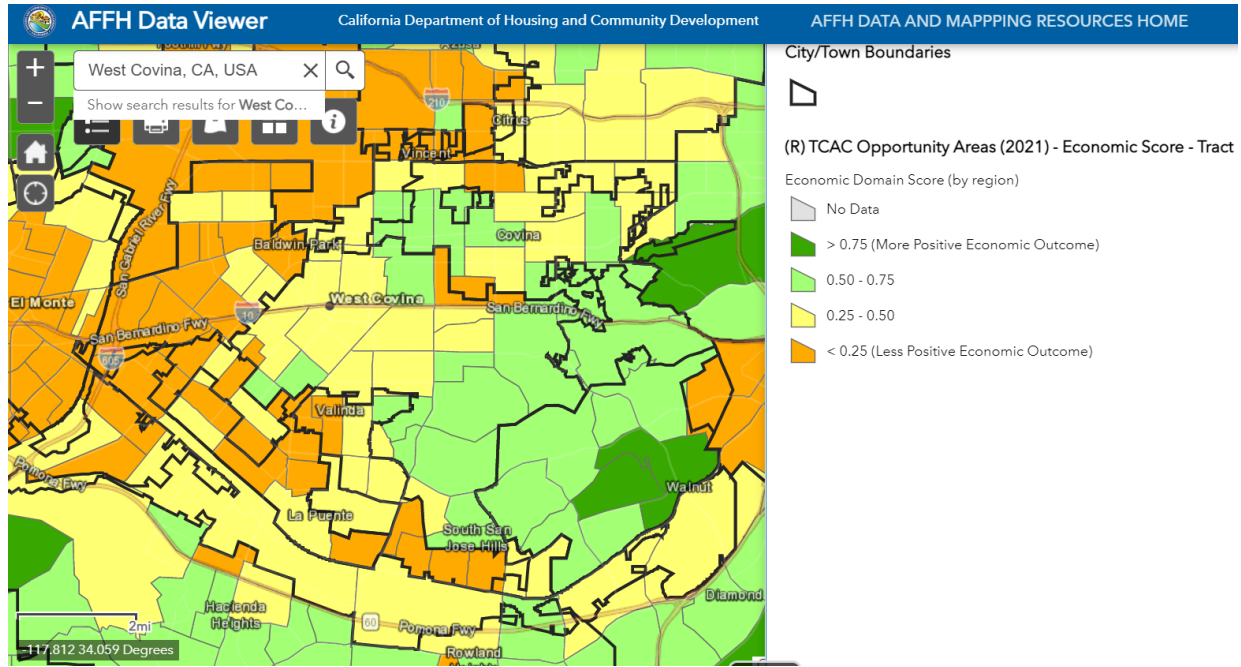
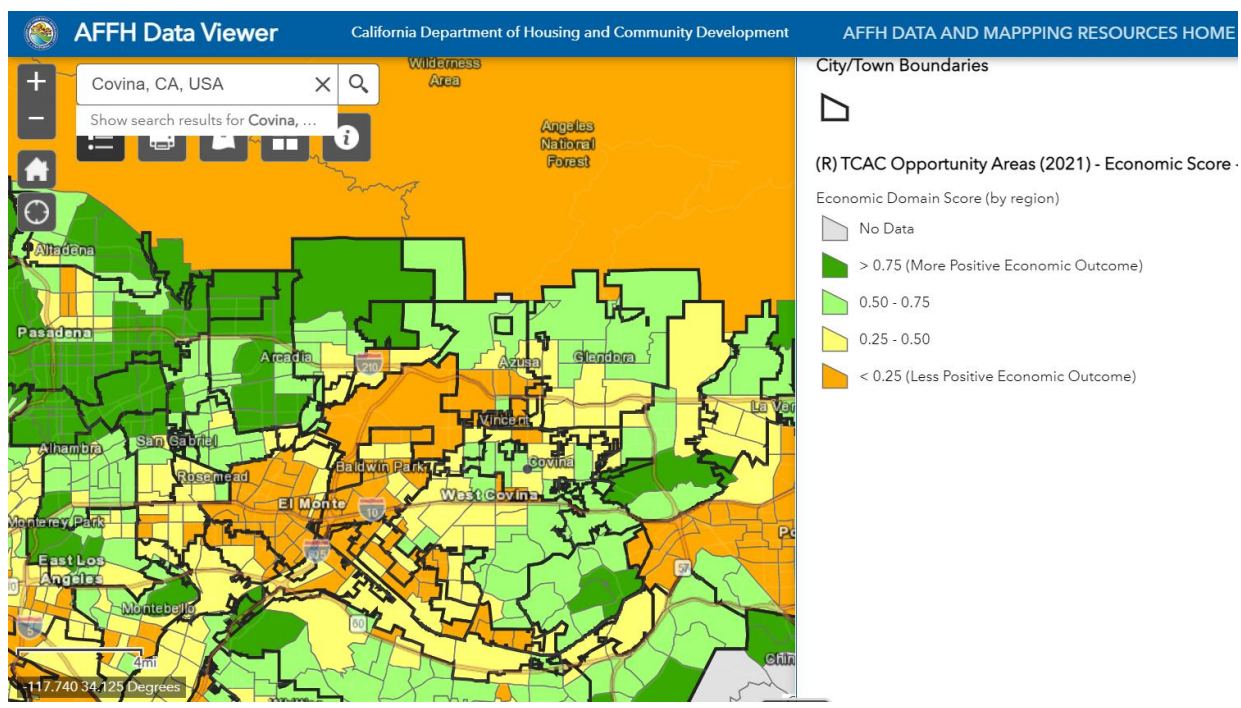


Figure D-17  
TCAC Economic Opportunity – San Gabriel Valley Area

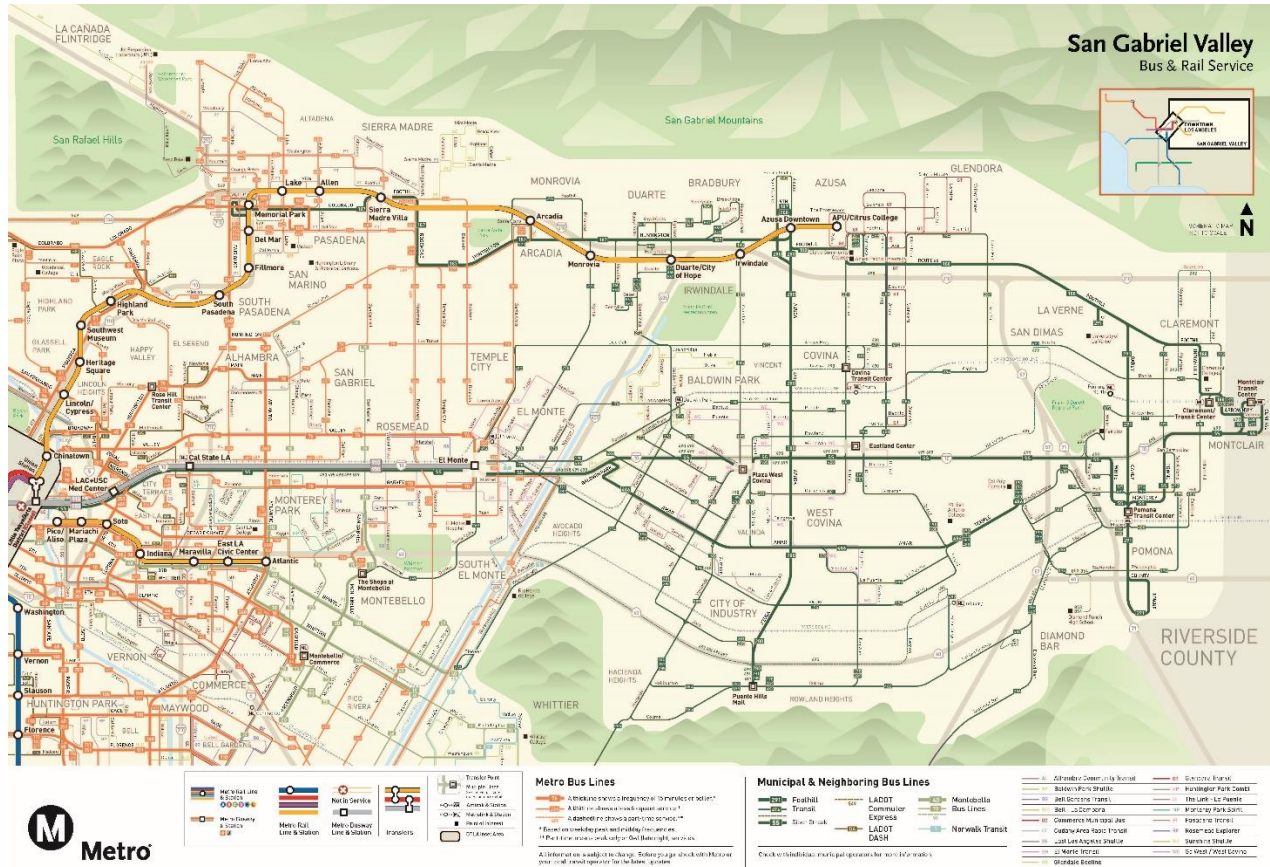




#### 4) Transportation Opportunity

West Covina enjoys excellent public transportation, as shown in Figure D-18. Metrolink rail service is accessible at the Covina Transit Center immediately to the north of West Covina, and several bus routes also serve the city.

**Figure D-18**  
**San Gabriel Valley Transit Service Map**



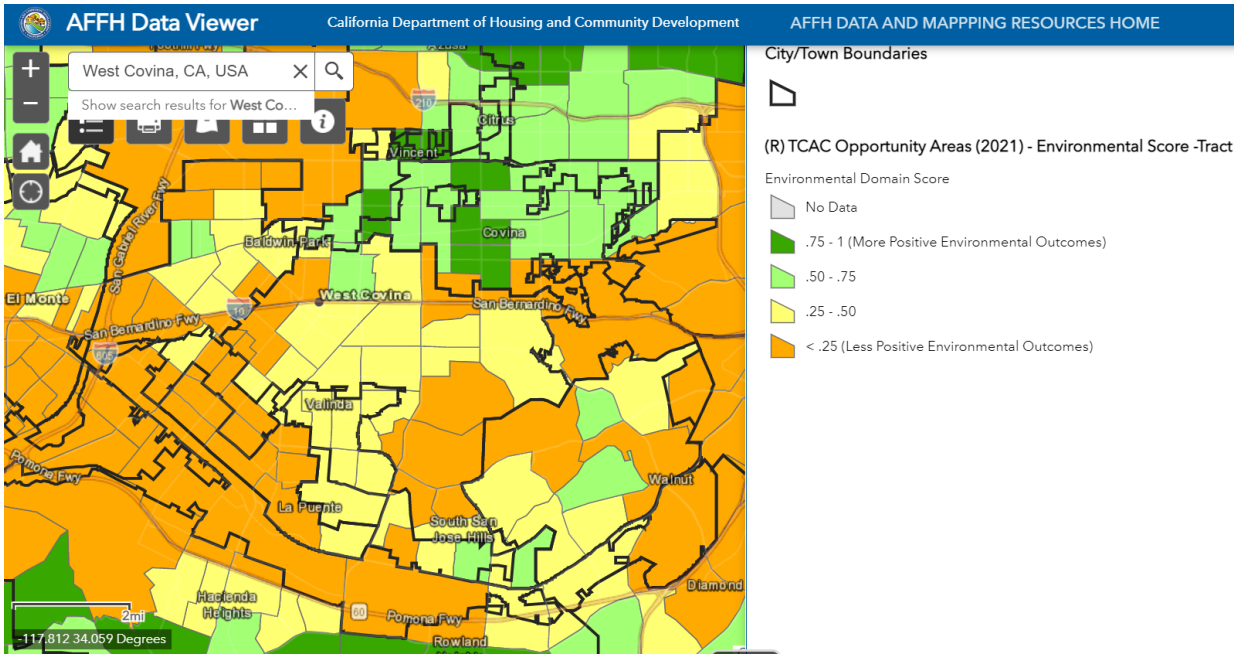
According to the County AI, the transit trip index for the Urban County area shows little disparity among the racial or ethnic classes.

#### 5) Environmental Opportunities

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

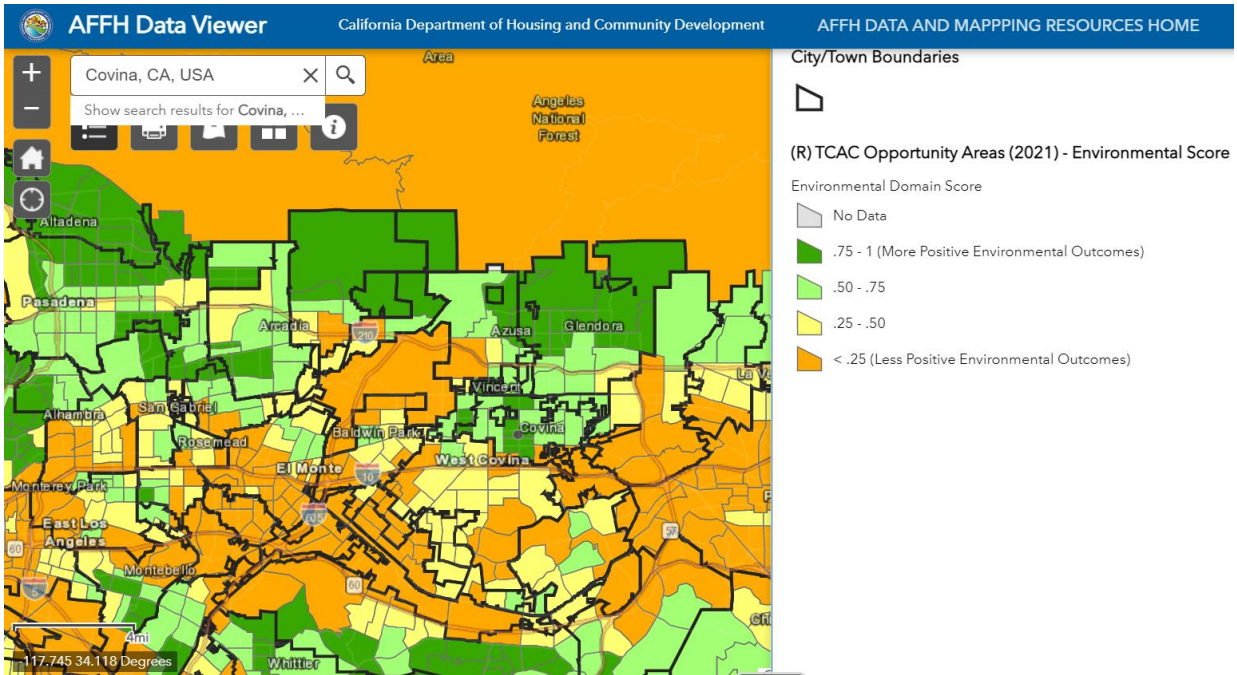
In West Covina, the highest environmental opportunity scores (0.5 – 0.75) are found in the northern portion of the city (Figure D-19) while most areas show lower scores (less than 0.5).

**Figure D-19**  
**TCAC Environmental Opportunity – West Covina**



In the context of the larger San Gabriel Valley, environmental opportunity scores in West Covina are similar to adjacent areas to the east, west and south but lower than areas to the north (Figure D-20).

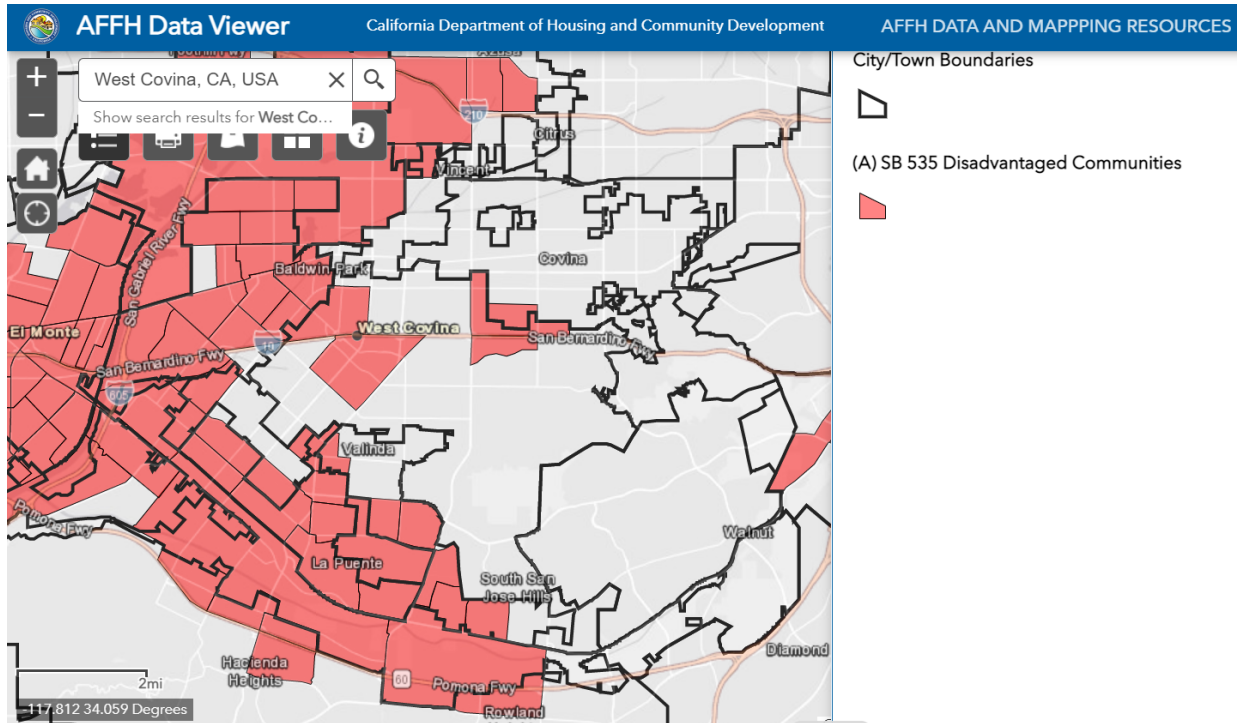
**Figure D-20**  
**TCAC Environmental Opportunity – San Gabriel Valley Area**



## 6) Disadvantaged Communities

Senate Bill 1000 (SB 1000) requires cities with identified disadvantaged communities (DACs) to include environmental justice goals and policies in the General Plan. Per SB 1000, the California EPA uses CalEnviroScreen, a mapping tool to identify disadvantaged communities. CalEnviroScreen examines various indicators to characterize pollution and socioeconomic factors. As seen in Figure D-21 below, portions of West Covina along the I-10 freeway are classified as disadvantaged communities.

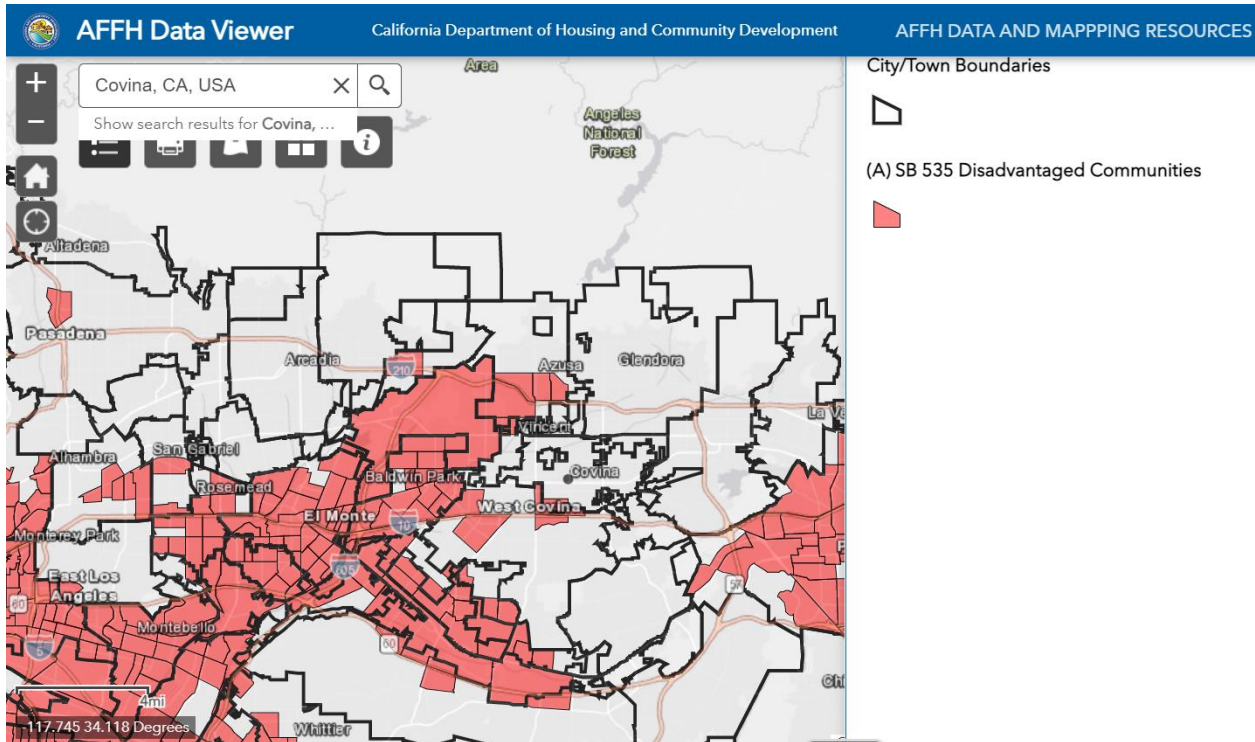
**Figure D-21**  
**Disadvantaged Communities – West Covina**





As seen in Figure D-22, disadvantaged communities in the San Gabriel Valley area are primarily found to the west and south of West Covina and also in the Pomona area to the east.

**Figure D-22**  
**Disadvantaged Communities – San Gabriel Valley Area**



## **E. Disproportionate Housing Needs and Displacement Risk**

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

### **1) Cost Burden (Overpayment)**

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

Overpayment is a problem for many West Covina residents, particularly lower-income households. According to recent HUD CHAS estimates (Figure D-23) approximately 5,505

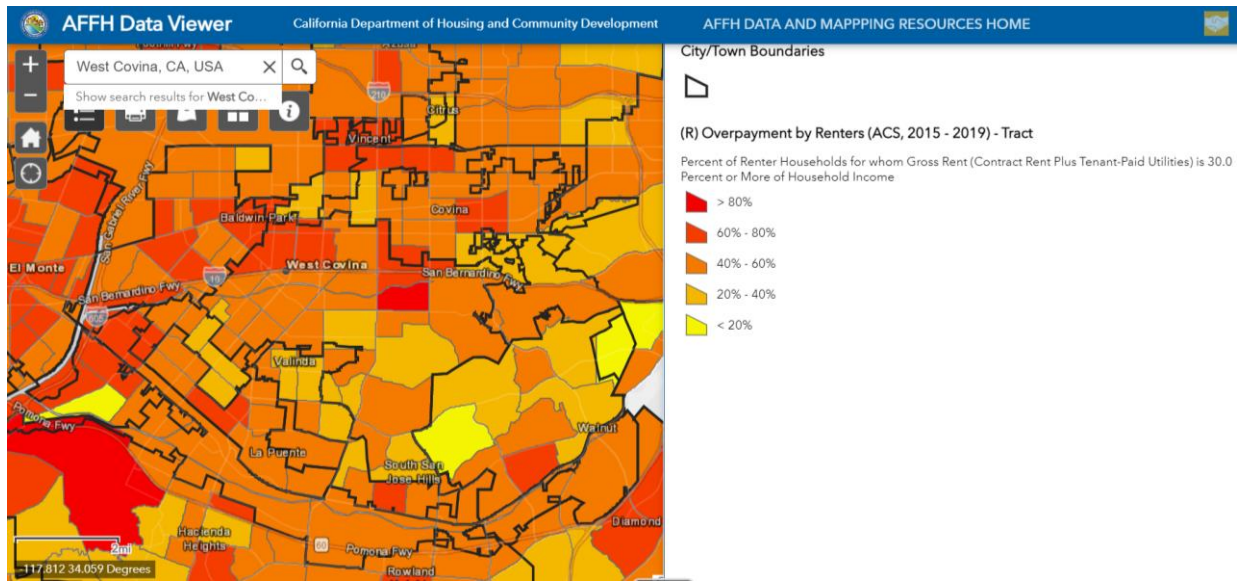
renter households (50% of all renters) and 6,215 owner households (32% of all owners) were paying more than 30% of income for housing. The highest rates of overpayment occur among very-low-income and extremely-low-income households. The impact of housing overpayment on lower income households is particularly significant for special needs populations – seniors, persons with disabilities, and female-headed households with children.

**Figure D-23**  
**Cost Burden by Tenure and Income Category – West Covina**

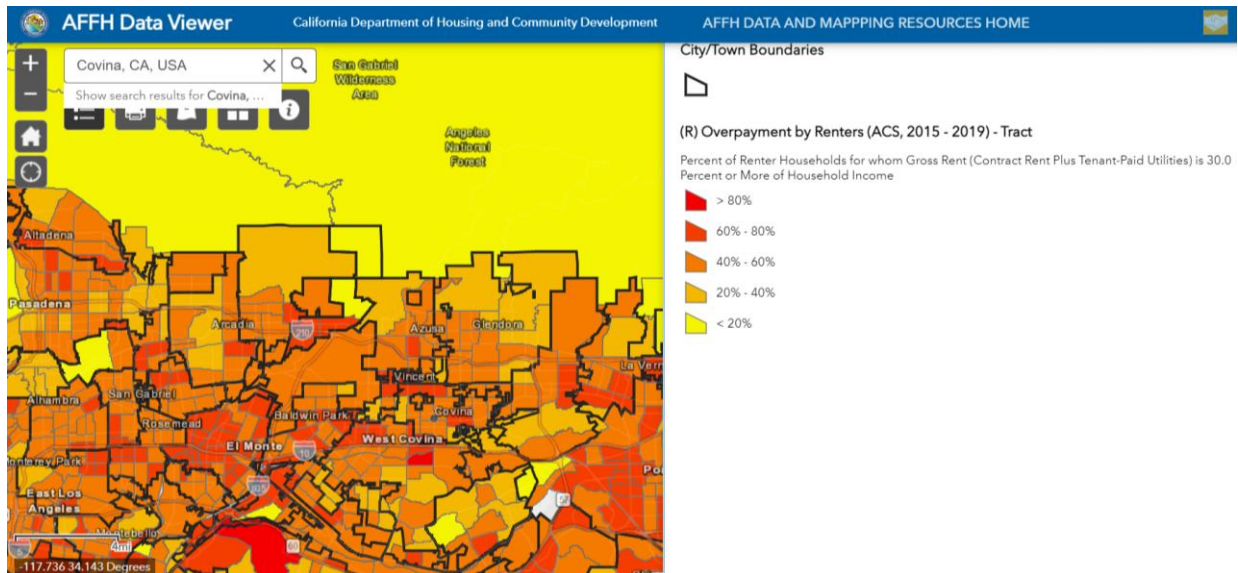
Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	1,970	1,760	2,300
Household Income >30% to less-than or= 50% HAMFI	1,810	1,175	2,045
Household Income >50% to less-than or= 80% HAMFI	1,355	255	2,150
Household Income >80% to less-than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

As shown in Figure D-24, overpayment among renters is most prevalent in the northern, portion of the city where more than 60% of renters are overpaying for housing in some census tracts. When compared to conditions in other areas of the San Gabriel Valley (Figure D-25) overpayment among West Covina renters appears be similar to adjacent communities.

**Figure D-24**  
**Renters Overpaying for Housing – West Covina**



**Figure D-25**  
**Renters Overpaying for Housing – San Gabriel Valley Area**



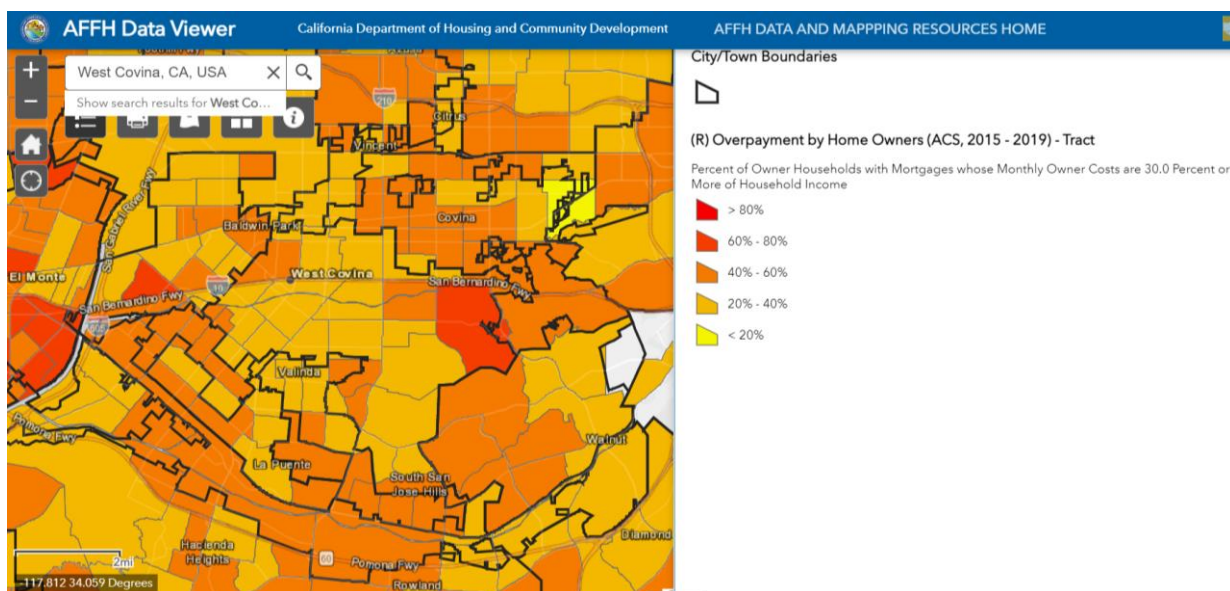
Overpayment among West Covina homeowners ranges from 20% to 60% in most portions of the city, although higher overpayment rates of 60% to 80% are seen in the eastern neighborhoods (Figure D-26). Rates of overpayment among homeowners in West Covina appear to be similar to the adjacent communities of the San Gabriel Valley.

The problems of overpayment are addressed through programs in the Housing Plan (Chapter 2) including 1.2 – Monitor and Preserve Affordable Housing, 2.1 – Acquisition and Rehabilitation, 2.2 – Affordable Housing Financing, 2.4 – Los Angeles County Partnerships,

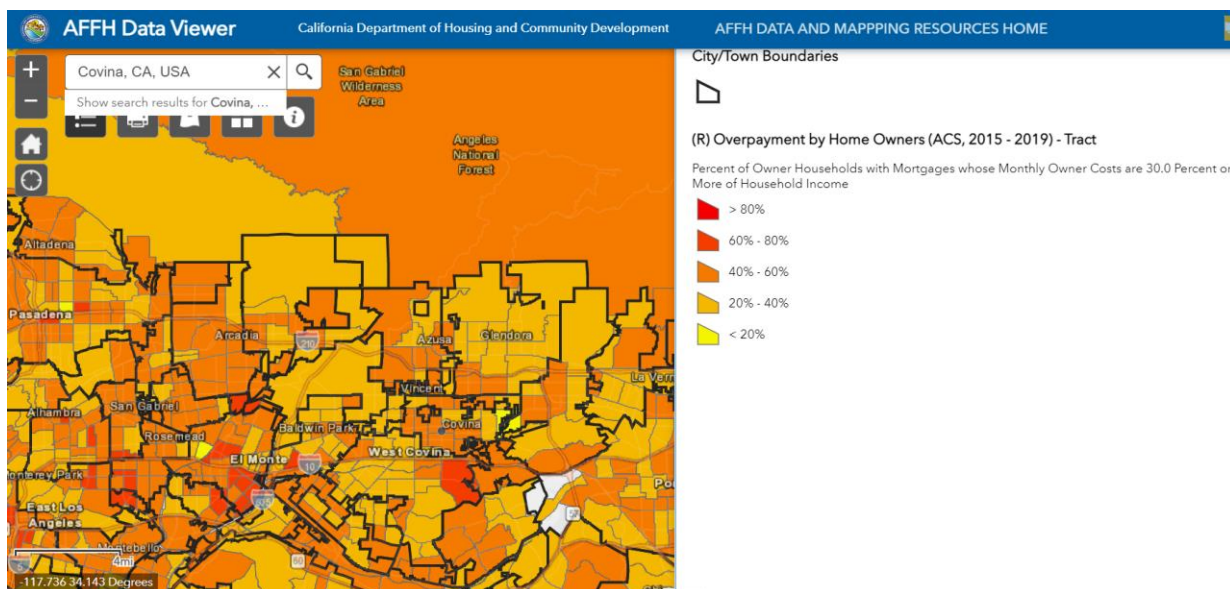


3.1 – Reduce Development Constraints, 3.2 – Density Bonus, 3.3 – Priority Processing for Affordable and Special Needs Housing, 3.4 – Accessory Dwelling Units, 3.5 – Manufactured Housing and Mobile Home Rent Control, 4.1 – Fair Housing, 4.2 – Reasonable Accommodation for Persons with Disabilities, 4.3 – Senior Center Shared Housing, 4.4 – Homeless Assistance, 4.5 – Housing for Persons with Disabilities, 5.1 – Ensure Adequate Sites to Accommodate the RHNA, and 5.3 – Local Agency Surplus Land for Affordable Housing.

**Figure D-26**  
**Homeowners Overpaying for Housing – West Covina**



**Figure D-27**  
**Homeowners Overpaying for Housing – San Gabriel Valley Area**



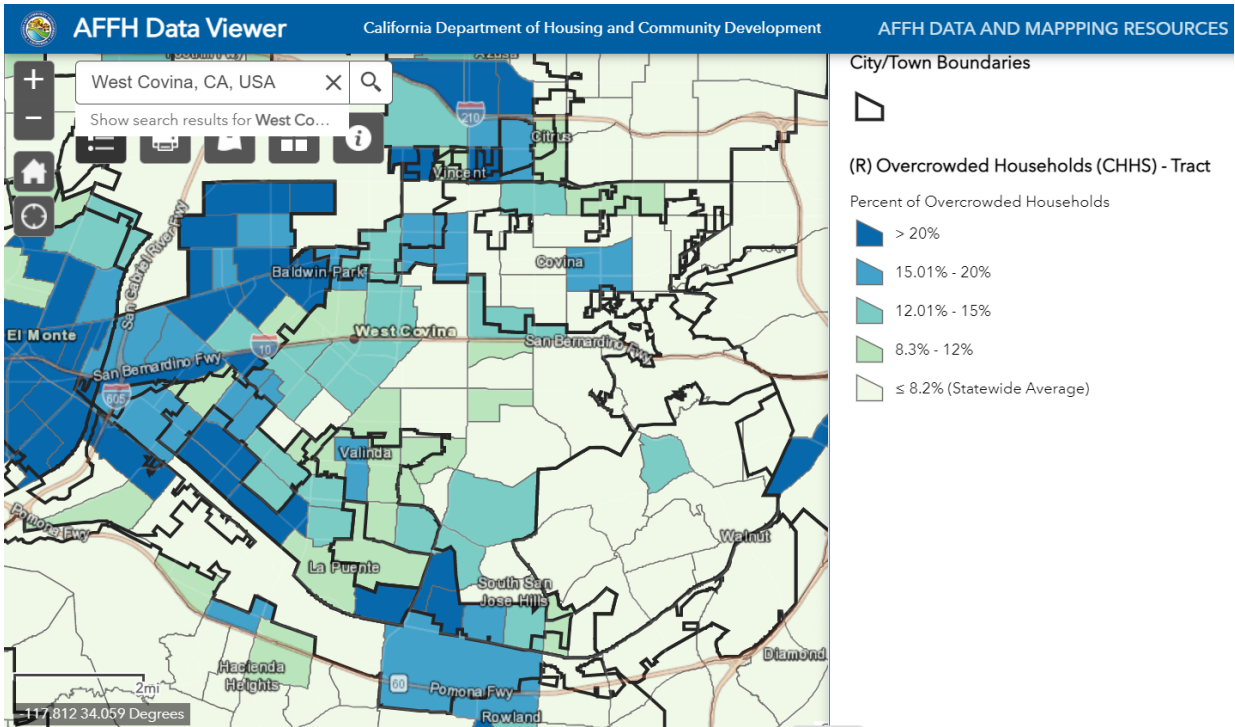
## 2) Overcrowding

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

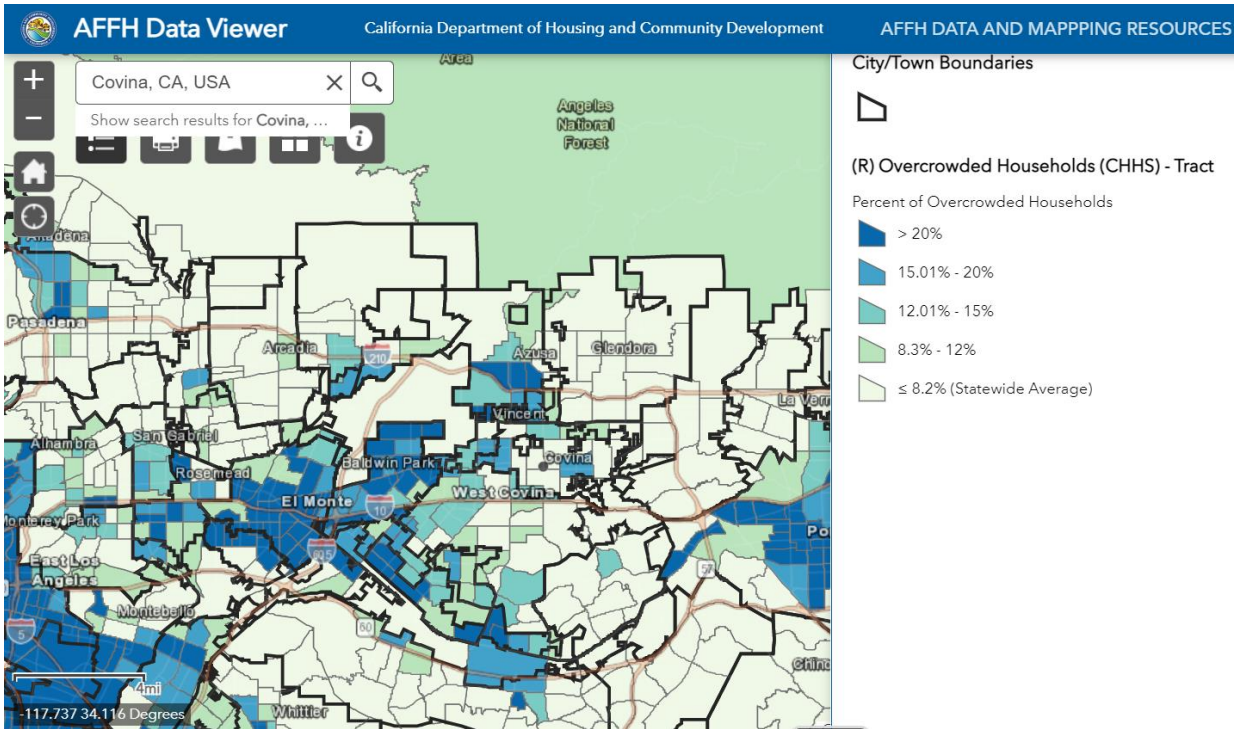
In West Covina, some neighborhoods in the southern and western portions of the city have overcrowding rates of 12%-20% while the central and eastern portions of the city have overcrowding rates less than 12% (Figure D-28). When viewed in the context of the larger San Gabriel Valley area, overcrowding in West Covina is generally similar to adjacent cities to the north and east but lower than many areas to the south and west.

The problems of overcrowding are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Programs 1.2 – Monitor and Preserve Affordable Housing, 2.1 – Acquisition and Rehabilitation, 2.2 – Affordable Housing Financing, 2.4 – Los Angeles County Partnerships, 3.1 – Reduce Development Constraints, 3.2 – Density Bonus, 3.3 – Priority Processing for Affordable and Special Needs Housing, 3.4 – Accessory Dwelling Units, 3.5 – Manufactured Housing and Mobile Home Rent Control, 4.1 – Fair Housing, 4.2 – Reasonable Accommodation for Persons with Disabilities, 4.3 – Senior Center Shared Housing, 4.4 – Homeless Assistance, 4.5 – Housing for Persons with Disabilities, 5.1 – Ensure Adequate Sites to Accommodate the RHNA, and 5.3 – Local Agency Surplus Land for Affordable Housing).

**Figure D-28**  
**Overcrowded Households – West Covina**



**Figure D-29**  
**Overcrowded Households – San Gabriel Valley Area**

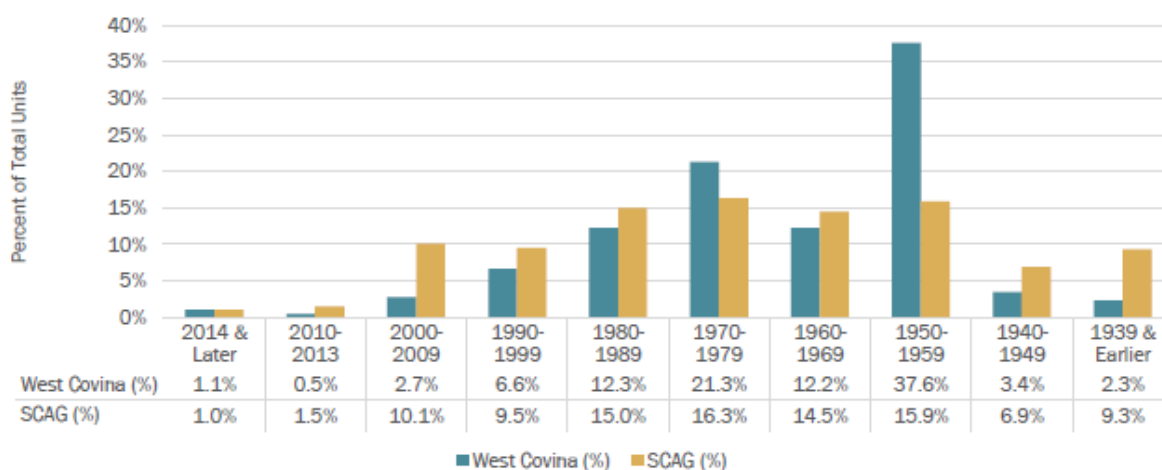


### 3) Substandard Housing

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

The age of housing units in West Covina compared to the SCAG region as a whole is shown in Figure D-30. This chart indicates that about 80% of housing units in West Covina were constructed before 1980. This suggests that there is likely to be a need for maintenance and rehabilitation, including remediation of lead-based paint, for a substantial number of housing units in the city. A general reconnaissance of older neighborhoods in the City suggests that between 2% and 3% of the City's housing stock is in need of repair, while fewer than a dozen homes may be in need of replacement. The Housing Plan includes Program 1.1 – Housing Preservation to provide funding assistance to low- and moderate-income homeowners for home repairs.

**Figure D-30**  
**Age of Housing Units – West Covina vs. SCAG Region**



### 4) Homelessness

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

The homeless count conducted by the Los Angeles Homeless Services Authority (LAHSA) in 2020 estimated that there were approximately 58,936 homeless persons Los Angeles County.

These include families that might be displaced through evictions, women and children displaced through abusive family life, persons with substance abuse problems, veterans, or persons with serious mental illness. West Covina is located within the San Gabriel Valley Service Planning Area (SPA 3), which had a 2020 homeless estimate of 5,082 people. LAHSA estimated that there were 124 homeless persons in West Covina in 2020.<sup>6</sup>

In 1995 the San Gabriel Valley Consortium on Homelessness was created to help the region develop a strong regional response to the needs of the growing homeless population. The Consortium has a focus on facilitating partnerships, educating the community and member agencies, and advocating for appropriate services. In 2019, the Consortium reset its direction to a more concentrated effort to support and build capacity for local service providers. The San Gabriel Valley Council of Governments (COG) is another regional agency that also addresses regional homelessness issues. As a member agency in the San Gabriel Valley COG, West Covina cooperates with its sister cities to address the issue of homelessness.

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

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

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<sup>6</sup> <https://www.lahsa.org/documents?id=5201-homelessness-statistics-by-city.pdf>



- 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.

## 5) Displacement Risk

In 2016, the Urban Displacement Project<sup>7</sup> team developed a neighborhood change database to help stakeholders better understand where neighborhood transformations are occurring and to identify areas that are vulnerable to gentrification and displacement in Southern California. The database includes Los Angeles, Orange, and San Diego counties, with gentrification and sociodemographic indicators based on data from the Census Bureau American Community Survey and shows whether each Census tract gentrified between 1990 and 2000; gentrified between 2000 and 2015; gentrified during both of these periods; or exhibited characteristics of a “disadvantaged” tract that did not gentrify between 1990 and 2015.

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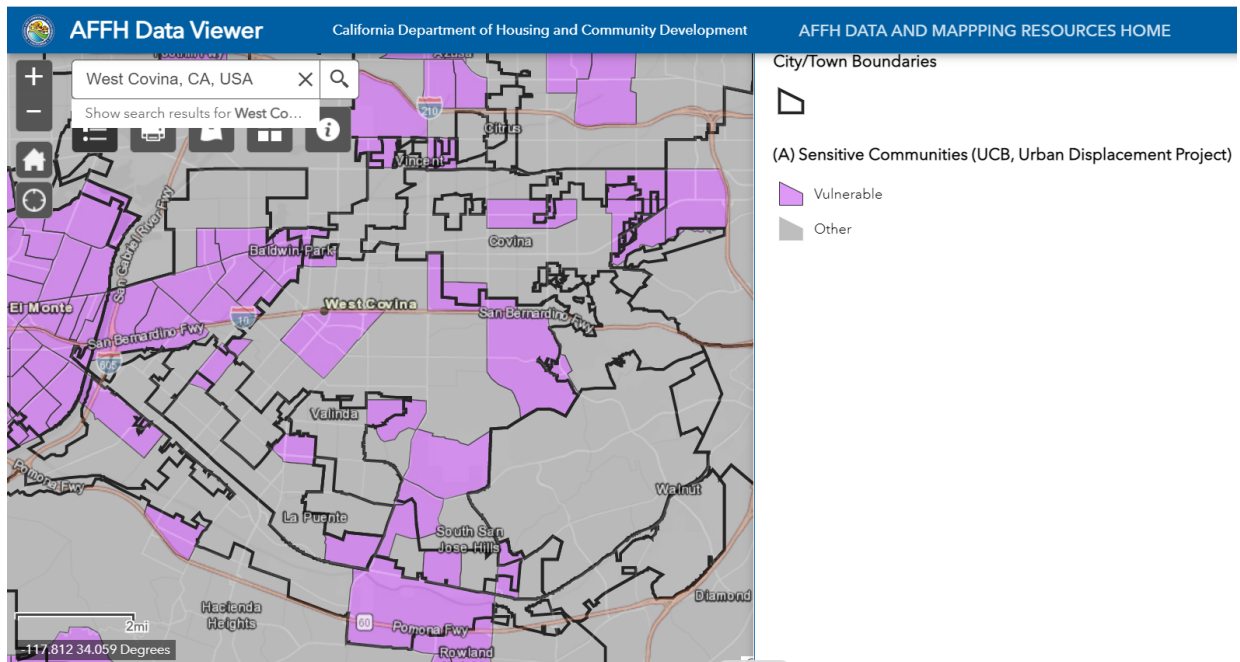
<sup>7</sup> <https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/>



Based on this neighborhood change database, the team found that the areas most susceptible to displacement in the San Gabriel Valley are portions of Pasadena, Altadena, Monrovia and Duarte, as well as the cities in the southern portion of the Valley. Figure D-31 shows areas considered vulnerable to displacement in West Covina and surrounding areas.

As noted in the Housing Plan, Program 5.1 includes a commitment to ensure compliance with legal protections and replacement housing requirements for existing tenants who may be displaced by new developments.

**Figure D-31**  
**Displacement Vulnerability – West Covina**



As discussed in Section 3.8 of the Housing Needs Assessment, there is one development – Mountain Shadows – with 84 lower-income units at risk of converting to market rate during the 2021 to 2031 period. Program 1.2 - Monitor and Preserve Affordable Housing is included in the Housing Plan to facilitate the preservation of these affordable units.

### 3. Sites Inventory Analysis

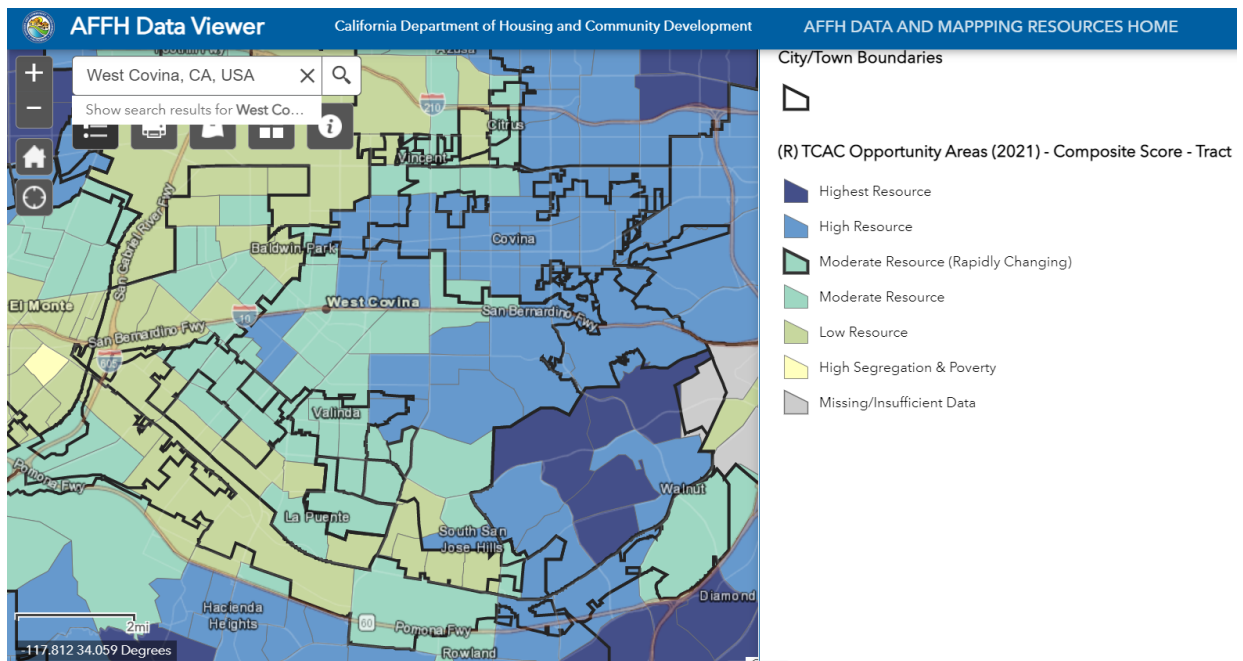
The City's inventory of sites for potential housing is presented in Appendix B. As summarized in Table B-1, the inventory is comprised of approved or pending projects, non-vacant underutilized sites and future ADUs. As with most cities in the metro areas of Southern California, vacant developable land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

Access to opportunity is analyzed in Section D, above. As shown in Appendix B – Sites Inventory, a significant component to underutilized sites are located in the Downtown Plan Overlay Zone area. This area is designated by the TCAC/HCD opportunity composite score map as High Resource and Moderate Resource (Figure D-32).

The following findings summarize how the sites inventory furthers fair housing in West Covina.

- Sites zoned for high density mixed-use development in the Downtown will include housing for a variety of income levels, fostering mobility of households in the city.
- Sites in the Downtown are located in the TCAC High Resource and Moderate Resource areas, which provide access to opportunity.
- A significant portion of the sites identified in the Downtown area do not currently contain housing units, which minimizes the potential for displacement. In the event that any future development would displace existing residential units, Program 5.1 in the Housing Plan will ensure compliance with State protections for existing tenants and replacement housing requirements.
- New mixed-use development in the Downtown will create additional economic opportunities for local residents.
- While the Downtown area provides the largest component of the potential residential inventory, it is important to recognize that existing single-family residential neighborhoods also provide substantial potential for new housing in areas of high opportunity through ADUs and SB 9 urban lot splits.

**Figure D-32**  
**TCAC Opportunity Areas Composite Score – West Covina**



#### **4. Contributing Factors, Goals, Policies and Actions**

The Housing Element AFFH analysis must include an identification and prioritization of significant contributing factors to segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs. “Fair housing contributing factor” means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all the prior efforts and analyses: outreach, assessment of fair housing, and site inventory. Contributing factors must also be prioritized in terms of needed impact on fair housing choice and strongly connect to goals and actions.

Through the participation of stakeholders, fair housing advocates, and the assessment of fair housing issues described in this appendix, the City has identified fair housing issues and contributing factors as well as meaningful actions to address those issues as described in Table D-2 below. Program 4.1 in the Housing Plan incorporates specific measures to implement these actions.

**Table D-2**  
**Fair Housing Issues, Contributing Factors and Meaningful Actions**

Fair Housing Issues	Contributing Factors	Priority	Meaningful Actions
Anti-Discrimination and Fair Housing Outreach	Some residents who are affected by discriminatory actions, including low-income households, persons with disabilities, racial/ethnic minorities and other protected classes, are in need of fair housing resources but may be unaware of the resources that are available. Although information about fair housing services is posted on the City website and in public offices, more could be done to make this information available.	High	<ul style="list-style-type: none"> <li>• Continue directing fair housing inquiries to the Housing Rights Center.</li> <li>• Continue to support the provision of housing for persons with disabilities.</li> <li>• Post information at the Senior Center regarding fair housing and conduct a presentation every two years at the Center about services available through the County CDC, Housing Rights Center and the City.</li> <li>• In cooperation with the Housing Rights Center, contact low-income apartment complexes to provide education and materials about the Section 8 program including multi-lingual materials.</li> <li>• Publish links to fair housing information via social media.</li> <li>• Conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings</li> </ul> (Program 4.1)
Affordable Housing Preservation	The loss of existing affordable housing may be a significant contributing factor to fair housing and potential displacement. When subsidy contracts expire, the housing providers that often have the least economic incentive to renew their affordability restrictions are those that are located in higher opportunity areas or in areas that are gentrifying or at risk of gentrification. There is one subsidized low-income development in West Covina with affordability restrictions that could expire in the next 10 years. If affordability covenants are not extended, the loss of these affordable units could contribute to segregation and displacement.	High	The City will continue to monitor units with affordability covenants that are eligible to expire during the next 10 years. To encourage the preservation of these “at-risk” units, the City will coordinate with the County and non-profit housing organizations to encourage the extension and/or renewal of affordability covenants, comply with noticing requirements, provide education and assistance to tenants, assist with funding, and promptly reach out to qualified entities to preserve at-risk housing units. (Program 1.2)
Access to Opportunity	Lack of access to opportunity due to high housing costs is a significant contributing factor to fair housing throughout the San Gabriel Valley area. In West Covina, while access to public transportation and other resources is generally good, some portions of the city have lower economic,	High	Several programs in the Housing Plan are intended to improve access to opportunity: <ul style="list-style-type: none"> <li>• Programs 2.4 Los Angeles County Partnerships and 1.2 Preservation of Assisted Housing improve the</li> </ul>

Fair Housing Issues	Contributing Factors	Priority	Meaningful Actions
	educational and environmental opportunity. Increasing housing opportunities in areas with good opportunity would make it easier for low-income households to access the types of services and amenities that further social mobility.		<p>ability of lower-income households to afford suitable housing in areas with better access to opportunity.</p> <ul style="list-style-type: none"> <li>• Programs 5.1 Adequate Sites to Accommodate Housing Needs, 2.2 Affordable Housing Financing, and 5.3 Local Agency Surplus Land for Affordable Housing will ensure that sufficient opportunities are available for development of new affordable housing units and assist developers in accessing financing.</li> </ul>

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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January 14, 2022

Paulina Morales, Director  
Community Development Department  
City of West Covina  
1444 W. Garvey Avenue South, Room 208  
West Covina, CA 91790

Dear Paulina Morales:

**RE: City of West Covina's 6<sup>th</sup> Cycle (2021-2029) Draft Housing Element**

Thank you for submitting the City of West Covina's draft housing element received for review on November 16, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Californians for Homeownership pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of this statutory deadline, then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).



Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: [http://opr.ca.gov/docs/OPR\\_Appendix\\_C\\_final.pdf](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) and [http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf).

HCD appreciates the dedication of the housing element team during the update. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Dulce Ochoa, of our staff, at [dulce.ochoa@hcd.ca.gov](mailto:dulce.ochoa@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager

Enclosure

## **APPENDIX CITY OF WEST COVINA**

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, Building Blocks for Effective Housing Elements (Building Blocks), available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

### **A. Review and Revision**

*Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)*

The element must provide an evaluation of the cumulative effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness).

### **B. Housing Needs, Resources, and Constraints**

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

The element provides some general information on the City's population with a disability and access to opportunity. However, the element generally does not address this requirement. The element, among other things, must include outreach, an assessment of fair housing, analysis of the sites inventory, identification, and prioritization of contributing factors to fair housing issues and goals and actions sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity. For further guidance, please visit HCD's affirmatively furthering fair housing (AFFH) in California webpage at <https://www.hcd.ca.gov/community-development/affh/index.shtml>. In addition, HCD will provide additional guidance and samples to assist the City in meeting these requirements.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

Extremely Low-Income Households (ELI): While the element identifies the projected number of ELI households (p. 39), it must still analyze their existing housing needs. This is particularly important given the unique and disproportionate needs of ELI households. For example, the element should analyze tenure, cost burden and other household characteristics then examine trends and the availability of resources to determine the magnitude of gaps in housing needs. In turn, this analysis should guide the formulation of responsive policies and programs. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml>.

Employment Trends: The element provides some information on employment trends, but it could include additional data and analysis to better formulate policies and programs. For example, the element could examine local jobs and wages relative to affordability, major employers and relationship to housing, proximity to jobs, predominant modes of transportation and opportunities for improvement. The element could utilize data available through Local Housing Data prepared by the Southern California Association of Governments at <https://scaq.ca.gov/local-housing-data>.

3. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Overpayment: The element must analyze the number of overpaying households, including lower-income overpaying households by tenure (i.e., renter and owner).

Housing Costs: While the element includes sale prices for ownership housing, it must also analyze rental costs, including trends and current rents in the area.

4. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Progress in Meeting the Regional Housing Needs Allocation (RHNA): The City's RHNA may be reduced by the number of new units pending, approved, permitted, or built since July 1, 2021. The element lists 867 units in approved projects affordable to moderate-income households and concludes the affordability is based on expected sales price or rents but should also provide supporting documentation to demonstrate affordability. This is particularly important since the element provides no information on current rents and sales prices do not appear affordable to moderate-income households.

Parcel Listing: In addition to the other factors listed for identified sites (e.g., zoning, general plan), the element must sufficiently describe existing uses of nonvacant sites to facilitate an analysis of the potential for redevelopment in the planning period.

Realistic Capacity: The element assumes 80 percent of maximum allowable densities will be achieved for the calculation of residential capacity, but it does not provide support for

these assumptions (p. 76). The element should demonstrate what specific trends, factors, and other evidence led to the assumptions or adjust assumptions as appropriate. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level. For example, similar to Table B-2, the element should list recent projects by zoning, allowable densities, built densities and affordability.

In addition, for sites with nonresidential zoning, the element should account for the likelihood of 100 percent nonresidential development in the calculation of residential capacity. This analysis should consider the likelihood of 100 percent nonresidential uses, performance standards for residential development and development trends supporting residential. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly.

Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The analysis must consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. For example, the element lists several factors used to identify nonvacant sites but should reflect the values of these factors in the inventory. Further, the element should support these factors based on development trends and the City's experience with converting existing uses to higher density residential development or consider an alternative methodology. Also, the element explains that only one factor needs to be satisfied to identify a nonvacant site with potential for redevelopment; however, it should include substantial support to demonstrate whether this assumption is reasonable. Finally, the element should include an analysis of the extent that existing uses impede additional development, and the extent the City's regulatory framework encourages redevelopment.

In addition, if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period (Gov. Code, § 65583.2, subd. (g)(2)). Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Finally, if the element identifies sites with existing residential uses. Absent a replacement housing policy, these sites are not adequate sites to accommodate lower-income households. The replacement housing policy has the same requirements as set forth in Government Code section 65915, subdivision (c), paragraph (3).

Large Sites: Sites greater than 10 acres (large sites) cannot be utilized toward the RHNA for lower-income households unless the element demonstrates sites of equivalent size and affordability were successfully developed during the prior planning period or provides other evidence sufficient to demonstrate the appropriateness of large sites. The element identifies two large sites greater than 10 acres. Each site assumes 100 percent of the residential capacity will be affordable to lower income households; 726 units on one site and 653 units on the other site or over half the RHNA for lower-income households on two sites. Additional analysis, as described above, is necessary to demonstrate the appropriateness of these sites. Developments with units affordable to lower-income households typically range in size from 50 to 150 units. The two identified sites go well beyond this range and do not appear suitable or appropriate to accommodate 100 percent affordability to lower-income households, including implications related to affirmatively furthering fair housing. For example, instead, the City could take a mixed-income approach to these sites, utilizing 30 to 40 percent of the total capacity toward the lower-income RHNA. If utilizing these sites toward the RHNA for lower income households, the element should scale back assumption and include additional analysis and programs as appropriate.

City-Owned Sites: If the sites inventory identifies sites that are City-Owned, the element must include an analysis to demonstrate their suitability and availability in the planning period. Specifically, the analysis should address general plan designations, zoning, allowable densities, support for residential capacity assumptions, existing uses and any known conditions that preclude development in the planning period and the potential schedule for development. If zoning does not currently allow residential uses at appropriate densities, then the element should include programs to rezone sites pursuant to Government Code section 65583.2, subdivisions (h) and (i). Based on the outcomes of this analysis, the element should include programs as appropriate.

Sites Identified in Prior Planning Period: Sites identified in prior planning periods (vacant sites identified in two planning periods or nonvacant sites identified in prior planning period) shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within three years. The element should clarify if sites were identified in prior planning periods and if so, which sites and include a program if utilizing previously identified sites in the current planning period.

Map: The element must include a general map of identified sites. For additional information, see the sites inventory analysis section of the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/inventory-of-land-suitable.shtml>.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions.

### Zoning for a Variety of Housing Types:

- *Emergency Shelters:* The element indicates 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 (p. 61). Zoning may impose parking requirements on emergency shelters; however, to comply with AB 139 those requirements should only be the number sufficient and necessary for all staff working in the emergency shelter. As a result, the element should add or modify programs as appropriate.
- *Employee Housing:* Health and Safety Code section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The element must demonstrate zoning in compliance with this requirement or add or modify programs as appropriate.
- *Manufactured Housing:* The element must demonstrate the jurisdiction's zoning code allows and permits manufactured housing on a permanent foundation in the same manner and in the same zone as single-family housing (Government Code Section 65852.3). The element must demonstrate zoning complies with this requirement or add or modify programs as appropriate.

Accessory Dwelling Units (ADU): After a cursory review of the City's ordinance, HCD discovered several areas which were not consistent with State ADU Law. HCD will provide a complete listing of ADU noncompliance issues under a separate cover. As a result, the element should add a program to update the City's ADU ordinance to comply with state law.

5. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. (Gov. Code, § 65583, subd. (a)(5).)*

Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to multifamily parking, including condominiums (number of spaces, enclosed and covered requirement), minimum lot sizes and heights including adjacent and not adjacent to single family uses. Specifically, the analysis of minimum lot sizes should address any impacts on identified sites. Additionally, the analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.

Fees and Exactions: The element must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. For example, the analysis should identify the total amount of fees, including impact fees, for a typical single family and multifamily development and evaluate the proportion to total development costs.



For additional information and a sample analysis and tables, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/fees-and-exactions.shtml>.

**Building Codes and Their Enforcement:** The element mentions the City includes property and building maintenance standards in its Municipal Code (p. 53). The element should also describe which building code is enforced (e.g., 2019 Building Code), identify and analyze any local amendments and include a program as appropriate.

**Housing for Persons with Disabilities:**

- ***Reasonable Accommodation Procedure:*** The element briefly mentions the City's reasonable accommodation procedure, but it should also describe the procedure and evaluate impacts, including identifying and analyzing findings of approval.
- ***Definition of Family:*** The element should identify and evaluate any definition of family used in zoning and land use for impacts on housing for persons with disabilities and include programs if necessary.
- ***Community Care Facilities for Six or Fewer Persons:*** The element indicates community care facilities of six or fewer persons are permitted as-of-right on the same basis as other single-family uses (p. 59). The element should clarify which zones allow these housing types.
- ***Community Care Facilities for Seven or More Persons:*** The element indicates a conditional use permit is required for community care facilities for seven or more persons unlike other similar uses (p. 59). The element must clarify which zones and specifically analyze these constraints for impacts on housing supply and choices, approval certainty and objectivity for housing for persons with disabilities and include programs as appropriate.

**SB 35 Streamlined Ministerial Approval Process:** The element must clarify whether there are written procedures to implement SB 35 (Chapter 366, Statutes of 2017) and add or modify programs to establish a procedure if necessary.

**Local Ordinances:** The element must specifically analyze locally adopted ordinances such as inclusionary ordinances or short-term rental ordinances that directly impact the cost and supply of residential development.

**Zoning, Development Standards and Fees:** The element must clarify whether the community complies with new transparency requirements for posting all zoning, development standards and fees or include programs as appropriate.

6. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate*

*local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)*

Availability of Financing: The element provides some broad information on financing (p. 63). However, the element must consider whether housing financing, including private financing and government assistance programs, is generally available in the community. This analysis could indicate whether mortgage deficient areas or underserved groups exist in the community. The financing analysis may also identify the availability of financing from private foundations (including bank foundations) corporate sponsors, community foundations, community banks, insurance companies, pension funds, and/or local housing trust funds.

Requests for Lower Density, Permit Times, and Efforts to Address Nongovernmental Constraints: The element must analyze (1) requests to develop housing at densities below those identified in the inventory, (2) the length of time between receiving approval for a housing development and submittal of an application for building permits, and (3) any local efforts to address or mitigate nongovernmental constraints such as reduced fees, financing for affordable housing or expedited processes. The analysis should address any hinderances on the construction of a locality's share of the regional housing need and programs should be added or modified as appropriate.

7. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Large Households: The element indicates large households represented about 20 percent of owner-occupied households and about 21 percent of renter-occupied households (p. 30). However, the element should provide the total number of large households by tenure.

Farmworkers: The element indicates 224 farmworkers according to the American Community Survey (ACS) 2014-2018 5-year estimate. However, farmworkers from the broader area and those employed seasonally may have housing needs, including within the City's boundaries. As a result, the element should acknowledge the housing needs of permanent and seasonal farmworkers at a county-level (e.g., using USDA county-level farmworker data) and include programs as appropriate.

8. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)*

The element identifies 84 units at-risk within a 10-year period (p. 37). However, the analysis of "at-risk" units must also include the type of governmental assistance received and total number of elderly and nonelderly units.

## C. Housing Programs

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding B4, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.

2. *The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

While the element includes Programs 2.2 (Affordable Housing Finance), 2.4 (Los Angeles County Partnerships), 3.3 (Priority Processing) and 4.5 (Housing for Persons with Disabilities), it should include additional actions to assist in the development of housing for lower- and moderate-income households, including extremely low-income and all special needs households (e.g., persons with disabilities, persons with developmental disabilities, elderly, large households, etc.). This is particularly important since many of these programs were not successful in the prior planning period. For example, several programs (Appendix A) note the lack of success was because developers did not express interest. Programs in the current cycle should learn from this evaluation and proactively reach out to developers in all pertinent aspects of the housing program. Other examples include annually exploring and pursuing funding beyond the County or pursuing funding annually in partnership with nonprofit developers and service providers.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B5 and B6, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must include a complete assessment of fair housing. Based on the outcomes of that analysis, the element must add or modify programs.

5. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance. (Gov. Code, § 65583, subd. (c)(6).)*

Program 1.2 (Monitor and Preserve Affordable Housing): While the element includes a program to preserve at-risk units, the Program should also commit to incorporate preservation law, to reach out to owners by a date certain, coordinate with qualified entities, consider funding as appropriate, support funding applications and provide assistance and education for tenants.

6. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, “accessory dwelling units” has the same meaning as “accessory dwelling unit” as defined in paragraph (4) of subdivision (i) of Section 65852.2. (Gov. Code, § 65583, subd. (c)(7).)*

Accessory Dwelling Units (ADUs): Program 3.4 indicates the City will promote ADU development by assisting property owners with ADU applications and posting ADU information (p. 11). However, the element must also include a program to incentivize ADU development for lower and moderate-income households. Examples include exploring and pursuing funding, modifying development standards, and reducing fees beyond state law, pre-approved plans, and homeowner/applicant assistance tools.

#### **D. Quantified Objectives**

*Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)*

The element included Table 2-1 quantified objectives to establish an estimate of housing units by income category that can be constructed, rehabilitated, and conserved over the planning period (p. 18). While the element includes these objectives, it could also include additional objectives for conservation/preservation.

## **E. Public Participation**

*Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)*

While the element describes some workshops, survey and public meetings for the Housing Element update, moving forward, the City should employ additional methods for public outreach efforts, particularly to include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households. For example, the City could conduct targeted stakeholder interviews or establish a committee representative of lower-income households in future public outreach efforts. In addition, although the element provides some information on the public comments received and the City's response, it should also describe how they were considered and incorporated into the element.

Finally, the housing element does not appear to have been made available to the public with sufficient time to comment and consider prior to HCD submittal. If so, by not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in the course of its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including making revisions to the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.

**HCD Comments and Responses  
City of West Covina**

<b>HCD Comment (Letter of 1/14/2022)</b>	<b>Revised Draft Housing Element Page No.</b>	<b>Response/Revision</b>
A. Review and revision	Appendix A	Appendix A has been revised to analyze the cumulative effectiveness of City programs in meeting the housing needs of special needs populations.
B.1 Affirmatively furthering fair housing	Appendix D 15-16	The element has been revised to include additional analysis of fair housing. In addition, Program 4.1 has been revised to describe actions the City will take to affirmatively further fair housing.
B.2 Population and employment trends	38-39	<u>Extremely Low-Income Households (ELI)</u> . The analysis has been expanded to include the number of ELI households by tenure and level of overpayment.
	25-26	<u>Employment Trends</u> . The original draft element included all of the local housing data regarding employment as provided by SCAG in its pre-approved data package.
B.3 Household characteristics	33-34	<u>Overpayment</u> . The element has been expanded to include the number of households overpaying by tenure and income category.
	31-32	<u>Housing costs</u> . The element has been expanded to include additional analysis of rental costs.
B.4 Sites inventory	Appendix B	<u>Progress in Meeting the RHNA</u> : Appendix B has been revised to assign all approved units to the above-moderate income category.
	Appendix B	<u>Parcel listing</u> . The sites inventory (Table B-3) has been expanded to include additional information regarding existing uses on non-vacant sites.
	Appendix B	<u>Realistic Capacity</u> . The element has been revised to provide additional analysis of realistic development potential based on recent development trends.



HCD Comment (Letter of 1/14/2022)	Revised Draft Housing Element Page No.	Response/Revision
	Appendix B 19-20	<u>Suitability of nonvacant sites</u> . Additional analysis has been provided regarding the potential capacity for additional housing on nonvacant sites. In addition, Program 5.1 has been expanded to address replacement requirements.
	Appendix B	<u>Large sites</u> . The inventory has been revised to address this comment.
	Appendix B	<u>City owned sites</u> . Appendix B has been revised to identify city-owned properties.
	Appendix B 19-20	<u>Sites Identified in a Previous Planning Period</u> . The element has been revised to include sites identified in a prior planning period. In addition, Program 5.1 has been revised in conformance with Government Code §65583.2(c).
	Appendix B	<u>Sites map</u> . The element has been revised to provide a general map of sites.
		<u>Electronic sites inventory</u> . A copy of the electronic sites inventory will be submitted concurrent with the adopted element pursuant to Government Code §65583.3(b).
B.4 Zoning for a variety of housing types	11-12	<u>Emergency Shelters</u> : Program 3.1 has been revised to address conformance with AB 139.
	11-12	<u>Employee Housing</u> : Program 3.1 has been revised in conformance with the Employee Housing Act.
	72	<u>Manufactured housing</u> . The element has been revised to confirm City conformance with State law regarding manufactured housing.
	13-14 72	<u>ADUs</u> . Program 3.4 in the Housing Plan includes a commitment to review current ADU law and update City regulations as necessary to ensure consistency with State requirements.
B.5 Governmental constraints	61	<u>Land use controls</u> . The element has been revised to include additional analysis of development standards.

HCD Comment (Letter of 1/14/2022)	Revised Draft Housing Element Page No.	Response/Revision
	62-65	<u>Fees and exactions</u> . The element includes a complete listing of all planning and impact fees for housing developments, and additional analysis of fees for different development types has been provided.
	60-61	<u>Building Codes and Enforcement</u> : The element has been expanded to include the applicable Building Code and local amendments.
B.5 Housing for Persons with Disabilities	68-69 16-17	<u>Reasonable accommodation</u> . The element has been revised to describe the City's reasonable accommodation procedure and findings for approval. In addition, Program 4.2 has been expanded to include revisions to current procedures consistent with fair housing law.
	70	<u>Definition of family</u> . The element has been revised to include the definition of family.
	69-70	<u>Community Care Facilities for Six or Fewer Persons</u> . The element has been revised to clarify that small community care facilities are currently allowed in all single-family zones consistent with State law.
	11-12 69-70	<u>Community Care Facilities for Seven or More Persons</u> . The element has been revised to include additional analysis of large community care facilities and Program 3.1 has been expanded to ensure consistency with State law.
	12-13	<u>SB 35 Streamlined Ministerial Approval Process</u> . Program 3.3 has been revised to include compliance with SB 35 Streamlined Ministerial Approval Process for eligible projects.
	74	<u>Local Ordinances</u> : The element has been revised to analyze any locally adopted ordinances that could impact the cost and supply of housing (e.g., inclusionary requirements, short term rentals).
	12-13	<u>Zoning, Development Standards and Fees</u> . Program 3.3 has been revised to address new transparency laws requiring fees and zoning requirements to be provided on a jurisdiction's website.
B.6 Non-governmental constraints	76	<u>Availability of Financing</u> : The element has been revised to include additional analysis of the availability of financing.
	67-68	<u>Requests for Lower Density, Permit Times, and Efforts to Address Nongovernmental Constraints</u> : The element has been revised to provide additional analysis of (1) requests to develop housing at densities below

HCD Comment (Letter of 1/14/2022)	Revised Draft Housing Element Page No.	Response/Revision
		those identified in the inventory, (2) the length of time between receiving approval for a housing development and submittal of an application for building permits, and (3) any local efforts to address or mitigate nongovernmental constraints such as reduced fees, financing for affordable housing or expedited processes.
B.7 Special needs	35	<u>Large households</u> . The element has been revised to provide the total number of large households by tenure.
	41-42	<u>Farmworkers</u> . The element has been revised to include USDA farmworker data for Los Angeles County as a whole,
B.8 Assisted housing developments that are eligible to change to non-low-income housing	42-43	The element has been revised to include the type of governmental assistance received and total number of elderly and nonelderly units.
C.1 Programs to make sites available during the planning period	Appendix B 19-20	The sites analysis and Program 5.1 have been expanded to address this comment.
C.2 Programs to assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households.	8-16	Programs 2.2 (Affordable Housing Finance), 2.4 (Los Angeles County Partnerships), 3.3 (Priority Processing) and 4.5 (Housing for Persons with Disabilities) have been strengthened to include proactive outreach to affordable and special needs housing developers and annually exploring and pursuing funding beyond the County or pursuing funding annually in partnership with nonprofit developers and service providers.
C.3 Programs to remove governmental and nongovernmental constraints		This comment is addressed in items B.5 and B.6 above.
C.4 Affirmatively furthering fair housing	Appendix D 15-16	Additional analysis of AFFH issues has been provided in Appendix D and Program 4.1 has been expanded to include additional actions the City will take to further fair housing.
C.5 Programs to preserve for low-income household the assisted housing developments	5	Program 1.2 has been expanded to commit to additional efforts the City will pursue to facilitate the preservation of at-risk units.

<b>HCD Comment (Letter of 1/14/2022)</b>	<b>Revised Draft Housing Element Page No.</b>	<b>Response/Revision</b>
C.6 Programs to incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent	13-14	Program 3.4 has been expanded to incentivize ADU development for lower and moderate-income households through strategies such as exploring and pursuing funding, modifying development standards, and reducing fees beyond state law, pre-approved plans, and homeowner/applicant assistance tools.
D. Quantified objectives	22	The original draft element included quantified objectives by income category. This comment does not identify any additional requirement under Housing Element law.
E. Public Participation	Appendix C	Appendix C has been revised to provide additional information regarding how public comments have been addressed in the element.

**PLANNING DEPARTMENT STAFF REPORT**

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**SUBJECT**

**CODE AMENDMENT NO. 22-04**

**GENERAL EXEMPTION**

**LOCATION:** City Wide

**REQUEST:** The proposed code amendment consists of certain amendments to the Zoning section of the West Covina Municipal Code related to development standards and requirements for cart containment.

**BACKGROUND**

The City has been experiencing an increase of abandoned and/or misused shopping carts littering city streets and sidewalks with an average of 180 abandoned shopping carts retrieved per month.

On July 12, 2022, the Planning Commission adopted Resolution No. 22-6110, initiating Code Amendment No. 22-04. The objective of the code amendment is to establish standards and requirements for cart containment measures in order to make businesses responsible for securing their own carts. At the July 12, 2022 Planning Commission meeting, the Planning Commission directed staff to survey how surrounding cities are addressing shopping carts. The Planning Commission brought up concerns that small businesses may experience financial hardships due to the cost associated with adopting cart containment measures.

**DISCUSSION**

City Survey

Staff surveyed eight (8) nearby cities (Baldwin Park, Covina, La Puente, El Monte, San Dimas, Arcadia, Pasadena, and Monrovia) regarding how each of the cities' are addressing shopping carts. Seven (7) out of the eight (8) surveyed cities have requirements that businesses utilizing carts provide the city and obtain approval of a cart containment plan that includes physical cart containment measures. Three (3) out of the eight (8) surveyed cities contract with a third party to collect abandoned shopping carts (Arcadia, Monrovia, and San Dimas). Seven (7) cities have ordinances that consider abandoned shopping carts as a public nuisance and specify that the city will collect abandoned shopping carts if it is not collected by the business within three days. The Survey is included in the staff report as Attachment No. 2.

Draft Ordinance

Similar to the surrounding surveyed cities, the draft ordinance includes a cart containment plan requirement. The following are the acceptable physical containment measures:

- Wheel locking/stopping mechanism in conjunction with a magnetic barrier along the perimeter of the premises
- Equipping carts with devices that would prevent carts from being removed from the interior of the building
- Installing physical barriers on the site that would prevent carts from being removed from the interior of the building
- Other options proposed by the business establishment and approved by the Director

Staff believes that the acceptable physical containment measures listed in the draft ordinance is

reasonable and would not be too costly. For example, one of the retailers in the City utilizes long sticks/rods permanently affixed to the carts to prevent the carts from vertically fitting through the doorway. In addition, the containment options are flexible and are open to new technology and ideas.

The draft ordinance requires all businesses to comply within 12 months of the effective date of the code with an opportunity to apply for a 6-month extension no more than 30 days after the expiration date. The extension of time is subject to the Director's approval with the Director's decision appealable to the Planning Commission.

In addition, the draft ordinance contains requirements for securing carts at the end of each business day and retrieving carts removed from the premises within 24 hours of removal or notice of removal.

#### Nuisance Determination

If the Planning Commission chooses to recommend City Council approval of Code Amendment No. 22-04, the draft ordinance that the City Council will review will contain the nuisance determination (not located in the zoning chapter of the West Covina Municipal Code) and would specify when the City would collect abandoned shopping carts with fees/penalties outlined.

### **GENERAL PLAN CONSISTENCY**

The proposed Code Amendment will not impact or change the General Plan land-use designation for any area in the City.

### **ENVIRONMENTAL DETERMINATION**

The project has been reviewed for compliance with the California Environmental Quality Act (CEQA), the CEQA guidelines, and the City's environmental procedures, and is found to be exempt pursuant to CEQA Guidelines Section 15061(b)(3), in that the proposed action consists of a code amendment, which does not have the potential for causing a significant effect on the environment.

### **STAFF RECOMMENDATIONS**

Staff recommends that the Planning Commission adopt Resolution No. 22-6116, recommending that the City Council approve Code Amendment No. 22-04.

**Submitted by:** Jo-Anne Burns, Planning Manager

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### **Attachments**

Attachment No. 1 - Resolution Recommending Adoption of Code Amendment No. 22-04

Attachment No. 2 - Survey



**P L A N N I N G   C O M M I S S I O N**  
**R E S O L U T I O N   N O . 2 2 - 6 1 1 6**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF  
WEST COVINA, CALIFORNIA, RECOMMENDING TO THE CITY  
COUNCIL APPROVAL OF CODE AMENDMENT NO. 22-04, CODE  
AMENDMENT RELATED TO DEVELOPMENT STANDARDS AND  
REQUIREMENTS FOR CART CONTAINMENT**

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**CODE AMENDMENT NO. 22-04**

**STATUTORY EXEMPTION**

**APPLICANT:**           City of West Covina

**LOCATION:**            Citywide

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**WHEREAS**, on July 12, 2022, the Planning Commission initiated Code Amendment No. 22-04 related to development standards and requirements for cart containment; and

**WHEREAS**, on October 11, 2022, the Planning Commission conducted a duly noticed public hearing as prescribed by law regarding proposed Code Amendment No. 22-04. At the conclusion of the public hearing, the Planning Commission approved Planning Commission Resolution No. 22-6116, recommending that the City Council approve Code Amendment No. 22-04 and

**WHEREAS**, studies and investigations made by this Commission and on its behalf reveal the following facts:

1.     The City of West Covina does not have cart containment development standards and requirements.
2.     The City has observed numerous abandoned and/or misused shopping carts littered within City streets and sidewalks.
3.     The Code Amendment is necessary in order to make business owners accountable for maintaining their carts secured within their business site/property.
4.     The proposed action is considered to be exempt from the provisions of the California Environmental Quality Act (CEQA), pursuant to Section 15061(b)(3) of the CEQA

Guidelines, in that the proposed action consists of a code amendment, which does not have the potential for causing a significant effect on the environment.

**NOW, THEREFORE, BE IT RESOLVED**, by the Planning Commission of the City of West Covina as follows:

**SECTION NO. 1:** The above recitals are true and correct and are incorporated herein as if set forth herein in full.

**SECTION NO. 2:** Based on the evidence presented and the findings set forth, Code Amendment No. 22-04 is hereby found to be consistent with the West Covina General Plan and the implementation thereof, and that the public necessity, convenience, general welfare, and good zoning practices require Code Amendment No. 22-04.

**SECTION NO. 3:** Based on the evidence presented and the findings set forth, the Planning Commission of the City of West Covina hereby recommends to the City Council of the City of West Covina that it approves Code Amendment No. 22-04 to amend Chapter 26 (Zoning) of the West Covina Municipal Code as shown on Exhibit "A."

**SECTION NO. 4:** The Secretary is instructed to forward a copy of this Resolution to the City Council for their attention in the manner as prescribed by law and this Resolution shall go into force and effect upon its adoption.

*[continued on next page]*

I HEREBY CERTIFY, that the foregoing Resolution was adopted by the Planning Commission of the City of West Covina, at a regular meeting held on the 11<sup>th</sup> day of October, 2022, by the following vote.

AYES:

NOES:

ABSTAIN:

ABSENT:

DATE:

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Nickolas Lewis, Chairperson  
Planning Commission

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Paulina Morales, Secretary  
Planning Commission

**EXHIBIT A**

**ORDINANCE NO.**

**AN ORDINANCE OF THE CITY COUNCIL OF WEST  
COVINA, CALIFORNIA, AMENDING PORTIONS OF  
CHAPTER 26 OF THE MUNICIPAL CODE TO  
AUTHORIZE DEVELOPMENT STANDARDS AND  
REQUIREMENTS FOR CART CONTAINMENT**

**WHEREAS**, on July 12, 2022, the Planning Commission initiated Code Amendment No. 22-04 related to development standards and requirements for cart containment; and

**WHEREAS**, on \_\_\_\_\_, the Planning Commission conducted a duly noticed public hearing as prescribed by law regarding proposed Code Amendment No. \_\_\_\_\_. At the conclusion of the public hearing, the Planning Commission approved Planning Commission Resolution No. \_\_\_\_\_, recommending that the City Council approve Code Amendment No. \_\_\_\_\_; and

**WHEREAS**, on \_\_\_\_\_, the City Council conducted a duly noticed public hearing as prescribed by law regarding this ordinance approving Code Amendment No. \_\_\_\_\_; and

**WHEREAS**, the City Council has duly considered all information presented to it, including written staff reports and any testimony provided at the public hearing, with all testimony received being made a part of the public record.

**NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF WEST COVINA, CALIFORNIA DOES HEREBY ORDAIN AS FOLLOWS:**

**SECTION 1. Code Amendment.** Article XII (Special Regulations for Unique Uses) of Chapter 26 (Zoning) of the West Covina Municipal Code is hereby amended to read as follows:

**DIVISION 31 – CART CONTAINMENT**

**26-685.14000 – Purpose.**

This division sets forth a uniform set of standards for any business establishment that uses carts in its operations, or that provides, or otherwise makes carts available for the use of its customers. Business establishments utilizing carts shall employ and/or install physical containment devices and/or equipment designed to prevent the unauthorized removal of such carts from the premises where they are located.

**26-685.14100 – Definition.**

Cart. The term "cart" means any basket or other like container of any size, dimension or material construction which is mounted on wheels or a similar device and is typically (but not necessarily exclusively) used by the customers, agents or employees of a business establishment for the purpose of transporting items of any kind.

**26-685.14200 – Cart Containment Regulations.**

(a) Each business establishment shall have a sign permanently affixed to all carts complying with the requirements of the Business and Professions Code Section 22435.1, shall have signage installed on site notifying customers that removal of the carts from the premises is prohibited, and shall be required to employ and/or install one or more of the following physical containment measures:

- (1) Equipping all carts with a wheel locking or stopping mechanism used in conjunction with an electronic or magnetic barrier running along or within the perimeter of the premises. Such wheel locking or stopping mechanism must activate when the cart crosses the electronic or magnetic barrier;
  - (2) Equipping all carts with devices and/or equipment which physically prevents the carts from being removed from the interior of any building or structure in which they are used;
  - (3) Installing physical barriers within all buildings or structures which physically prevent carts from being removed from the interior of any building or structure in which they are used;
  - (4) Installing an alternative cart containment system proposed by the specific business establishment and approved by the Community Development Director.
- (b) The employment and/or installation of any one or more of the options set forth under subsections (a)(1) through (3) of this section shall be required within 6 months of a written determination by the Community Development Director determining that an approved alternative cart containment system option does not reliably prevent the removal of carts from the premises. A containment system shall be deemed not to reliably prevent the removal of carts from the premises if the number of carts removed from the premises or found abandoned exceeds three (3) carts in a 30-day period and/or eight (8) total carts in any calendar year.

**26-685.14300 – Cart Containment Approval Process.**

Approval by Community Development Director. Commencing upon the effective date of this Division, every new or existing business establishment must either: (i) submit documentation proving, to the reasonable satisfaction of the Community Development Director, that the business establishment has installed any one or more of the measures set forth under Section 26-685.14200 (a)(1) through (3) and that such system is operational and in good working condition; or (ii) submit to the Community Development Director a proposal for the installation of an alternative cart containment system. The Community Development Director shall have thirty (30) calendar days from the date of submission to review any proposal for a barrier system contemplated under Section 26-685.14200 (a)(4) and may thereafter approve the proposal; deny the proposal; approve the proposal subject to modifications and amendments aimed at enhancing its cart containment

reliability and/or its architectural and aesthetic consistency with other on-premises improvements; or forward the proposal to the Planning Commission for review and render the final decision. No new business establishment shall be issued a certificate of occupancy until the requirements of this section are satisfied.

#### **26-685.14400 – Implementation and Amortization.**

All existing business establishments which do not have cart containment measures employed in accordance with Section 26-685.14200 (a)(1) through (3) or have an approved alternative containment measure employed per Section 26-685.14200 (a)(4), as of the effective date of the ordinance codified in this section, shall so comply within twelve (12) months after the effective date. A business establishment and/or owner of the premises upon which the business establishment is located may apply for an extension of time from the amortization period no more than 90 days prior to the expiration date or no more than 30 days after the expiration date.

- (a) The extension of time request shall be reviewed by the Community Development Director. The Community Development Director may only consider one extension of time per business establishment. In no case shall an extension of time greater than six (6) months be granted. The Planning Commission upon appeal, shall make the following findings in approving or conditionally approving an application for the extension of time request:
  - (1) That the strict application of the required cart containment measure will create an unreasonable hardship upon the applicant, which was not brought about by an act of the applicant
  - (2) That the extension of time request will not be materially detrimental to the public health, safety, or general welfare, or to the use, enjoyment or valuation of property of other persons located within the vicinity.
  - (3) That sufficient evidence has been submitted to support the need for the extension of time and appropriate amount of time.
- (b) Written notice of time and place of hearings conducted by the planning commission upon appeal relating to such matter shall be given not less than ten (10) consecutive calendar days in advance of such hearing to the applicant and property owner whose property is within a three hundred (300) foot radius of the subject lot. The applicant shall be responsible for providing the City with the required radius map and mailing labels. All persons interested in such matter shall be given reasonable opportunity to present relevant evidence relating to the request.

#### **26-685.24500 – Requirement for Securing Carts**

All carts located on the premises of any business (other than business establishments open 24 hours per day) shall be collected at the end of each business day by employees of the establishment and shall be collectively confined in a secure manner until the commencement of the next business day.

**26-685.24600 – Cart Retrieval Requirements**

The cart owner shall secure and continuously maintain a service to retrieve shopping carts which have been removed from their business premises within 24 hours of the removal or notice of removal.

**SECTION 2. Effective Date.** This Ordinance shall take effect and be in force thirty (30) days from and after the date of its passage.

**SECTION 3. Certification.** The Mayor shall sign and the City Clerk shall certify to the passage and adoption of this Ordinance and shall cause the same to be published or posted in the manner required by law.

**PASSED, APPROVED AND ADOPTED** on the \_\_\_\_\_ day of \_\_\_\_\_, 2022.

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Dario Castellanos  
Mayor

**APPROVED AS TO FORM**

**ATTEST**

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Thomas P. Duarte  
City Attorney

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Lisa Sherrick  
Assistant City Clerk

I, LISA SHERRICK, ASSISTANT CITY CLERK of the City of West Covina, California, do hereby certify that the foregoing Ordinance No. \_\_\_\_\_ was introduced at a regular meeting of the City Council held on the \_\_\_\_ day of \_\_\_\_\_, and adopted at a regular meeting of the City Council held on the \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, by the following roll call vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

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Lisa Sherrick  
Assistant City Clerk



**Shopping Cart – Policies & Codes**

*Survey conducted in August 2022*

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### City of Pasadena – Abandoned Shopping Cart Plan

Based on website and phone conversation with Customer Service Request Center Representative:

- Residents can use the following Citizen Service Center to create an **online or phone** request and pinpoint the exact location of an abandoned shopping cart they have seen and add information
  - o Once a request has been put in, City of Pasadena will contact the business to let them know where their cart has been located and to retrieve the cart and they will be fined
  - o If the cart remains abandoned, the business will continue to be fined
  - o Link: <https://www.cityofpasadena.net/citizen-service-center/submit-a-request/>
- City of Pasadena does not contract with a 3<sup>rd</sup> party to pick up shopping carts
- If carts are unidentified, Public Works or Code Enforcement will take them to the City yard to be disposed of
- All businesses must create a **Mandatory Abandoned Cart Prevention** plan to address loss prevention measures, employee training, community outreach, inventory, and a cart retrieval plan.
  - o Businesses can request exemptions from this requirement if they have:
    - A contract with a cart retrieval service
    - None of the business's carts have been found abandoned on 3+ occasions in a consecutive 6 month period

Municipal Code regarding Abandoned Shopping Carts – Ordinance 9.62

[https://library.municode.com/ca/pasadena/codes/code\\_of\\_ordinances?nodeId=TIT9PUPEMOWE\\_ARTVOFAGPR\\_CH9.62ABSHCA\\_9.62.010SHTI](https://library.municode.com/ca/pasadena/codes/code_of_ordinances?nodeId=TIT9PUPEMOWE_ARTVOFAGPR_CH9.62ABSHCA_9.62.010SHTI)

### City of Covina – Abandoned Shopping Cart Plan

Based on conversation with Jennifer in Code Enforcement:

- As of July 2022, the City of Covina is no longer contracting with a 3<sup>rd</sup> party shopping cart retrieval company
- Public Works Department is now in charge of retrieving carts; they have hired 1 part-time worker responsible for retrieving carts
- They utilize a Citizen Service Request Website that allows residents to report locations of abandoned shopping carts.
- Abandoned shopping carts are regarded as a public nuisance
- Requires cart containment plan

Municipal Code regarding Abandoned Shopping Carts – Chapter 8.18

<https://www.codepublishing.com/CA/Covina/html/Covina08/Covina0818.html>

[Chapter 5.70 SHOPPING CART CONTAINMENT AND RETRIEVAL BY OWNERS \(codepublishing.com\)](#)

### City of Baldwin Park – Abandoned Shopping Cart Plan

Based on conversation with individual from Planning Department:

- Individual property owners have their own security programs for shopping carts and is their responsibility to contract out to private companies
- If shopping carts are found in other places, individual shop owners are held financially responsible
- If the shopping carts are regarded as a public nuisance, then Public Works gets called in to deal with the situation
- Requires physical containment measures
- The city shall be permitted to destroy or otherwise dispose of any shopping cart removed by the city in the following circumstances:
  - o The shopping cart falls to contain a sign or other information that identifies the owner, and the city is unable to locate the owner with reasonable diligence; or
  - o The owner of the shopping cart or the owner's agent has failed to reclaim the shopping cart from the city within 30 days of receipt of notice that the shopping cart was removed by the city.

Municipal Code regarding Unattended Shopping Carts – Ordinance 98

[https://codelibrary.amlegal.com/codes/baldwinpark/latest/baldwinpark\\_ca/0-0-0-4404](https://codelibrary.amlegal.com/codes/baldwinpark/latest/baldwinpark_ca/0-0-0-4404)

**City of La Puente – Abandoned Shopping Cart Plan**

Based on conversation with individual from Code Enforcement and municipal code:

- Must have cart identification and must collect carts after business hours
- Businesses must have an approved Abandoned Cart Prevention plan from the City of La Puente
- It is solely up to businesses to create a plan to retrieve their shopping cart
- City will only retrieve a cart if:
  - o If impedes with emergency services
  - o Has no identification
  - o Abandoned cart has not been retrieved by business 3 days after notification
- If the city retrieves the cart:
  - o The city shall hold the cart at a location that is reasonably convenient to the owner/retailer and is open for business at least six hours of each business day.
  - o If the cart is not retrieved by the owner/retailer within 30 days after the owner has received notice via telephone or email, or other written correspondence, of the cart being impounded, or if the cart's owner cannot be determined within 30 days after the cart has been impounded, the cart may be sold or destroyed by the city

Municipal Code regarding Shopping Cart Regulations – Chapter 3.76

[https://codelibrary.amlegal.com/codes/lapuente/latest/lapuente\\_ca/0-0-0-41819](https://codelibrary.amlegal.com/codes/lapuente/latest/lapuente_ca/0-0-0-41819)

**City of Arcadia – Shopping Cart Retrieval Plan**

Based on phone conversation with Code Enforcement:

- City of Arcadia has contracted with Citywide Cart Savers, LLC to pick up shopping carts for all businesses; businesses do not have to pay a service fee for this amenity
- Some Arcadia businesses have their own cart retrieval companies that pick up their own carts – that is to their own discretion
- Citizens can use the online request center or phone through Citywide Cart Savers to report abandoned shopping cart locations, and the company will return them directly to businesses <https://citywidecartsavers.com/shopping-cart-retrieval/>
- City may impound a shopping cart if:
  - o It impedes emergency services
  - o Is not retrieved within three (3) business days from the date the shopping cart owner receives actual notice from the City of such cart's discovery and location.
- When the City has impounded a shopping cart, the City may recover its actual costs for providing such service.
- The City may fine a shopping cart owner fifty dollars for each occurrence in excess of three during a six-month period for failure to retrieve shopping carts
- Requires businesses to have a cart containment plan including physical containment measures

Link to Municipal Code Shopping Cart Containment and Retrieval – Chapter 9104.02.290

[https://library.municode.com/ca/arcadia/codes/code\\_of\\_ordinances?nodeId=ARTIXDIUSLA\\_C\\_HIDECO\\_DIV4RESPLAUSAC\\_S9104.02SPUSAC\\_9104.02.290SHCACORE](https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_C_HIDECO_DIV4RESPLAUSAC_S9104.02SPUSAC_9104.02.290SHCACORE)

**City of El Monte**

Based on conversation with individual from Public Works:

- The Public Works Department will treat abandoned like bulky items
- If Public Works finds shopping carts near the business it belongs to, they will return the cart to the business
- If Public Works finds shopping carts far away from the business it belongs to, they will take it to the City Yard
- They will let businesses know about the carts they have
  - o If shopping carts remain in the City Yard for over 1 month, they will be crushed/disposed of
- Oftentimes, businesses have contracted out with 3<sup>rd</sup> party cart retrieval company but if they come to pick it up from the City Yard, they require them to pick up all the carts that are there
- Requirement for business to have liability insurance
  - o Requires businesses to have a cart containment plan

Municipal Code regarding Use of Shopping and Laundry Carts – Chapter 5.25

[https://library.municode.com/ca/el\\_monte/codes/code\\_of\\_ordinances?nodeId=TIT5BULIRE\\_CH5.25USSHLACA\\_5.25.030CACOPL](https://library.municode.com/ca/el_monte/codes/code_of_ordinances?nodeId=TIT5BULIRE_CH5.25USSHLACA_5.25.030CACOPL)



**City of Monrovia**

*No answer; tried to call several times*

Based on information from website and municipal code:

§ 8.13.050 Abandoned Shopping Carts - Abatement, Removal And Storage.

- CarTrac Shopping Cart Retrieval is contracted to pick up abandoned shopping carts in Monrovia. Report carts the following ways:
  - o Residents can report the abandoned cart through California Shopping Cart Retrieval Service through their hotline or through [www.retailsolutionsus.com/pickuprequest](http://www.retailsolutionsus.com/pickuprequest) and must identify shopping cart location (address, cross street & city) and number of carts
- Citizens can also contact Public Works directly at (626) 932-5575
- If the shopping cart is not retrieved within 3 business days from the date the shopping cart owner receives notice from the city about its location, then the city may impound it.
  - o Any shopping cart reclaimed by the shopping cart owner within three business days following the date of actual notice of the impound shall be released and surrendered to the shopping cart owner at no charge
  - o After 30 days, the city can sell or dispose of the unclaimed shopping cart
- The city may fine a shopping cart owner \$50 for each occurrence in excess of three during a six-month period for failure to retrieve shopping carts in accordance with this section.
- When the city has impounded a shopping cart pursuant to division (A) or (B) of this section, the city may recover its actual costs for providing such service.
- **Requires Businesses to have a cart containment plan**

Municipal Code regarding Shopping Cart Containment, Retrieval And Abatement – Chapter 8.13

[https://codelibrary.amlegal.com/codes/monrovia/latest/monrovia\\_ca/0-0-0-64564](https://codelibrary.amlegal.com/codes/monrovia/latest/monrovia_ca/0-0-0-64564)

**City of San Dimas**

*No answer; tried to call several times*

Based on Website:

- The City of San Dimas has entered into an agreement with **Urban Graffiti Enterprises Inc.** for shopping cart abatement.
- Online Citizen Service Center where citizens can report location, # of, and additional information about where citizens have spotted abandoned shopping carts
- See here: [https://sandimasca.gov/how\\_do\\_i/report/report\\_a\\_concern.php](https://sandimasca.gov/how_do_i/report/report_a_concern.php)

Municipal Code does not go into detail about abandoned shopping carts; closest is Parking Design Requirements 18.156.080 and 18.544.270 Cart storage.

[https://library.qcode.us/lib/san\\_dimas\\_ca/pub/municipal\\_code/item/title\\_18-chapter\\_18\\_544-article\\_iii-18\\_544\\_270](https://library.qcode.us/lib/san_dimas_ca/pub/municipal_code/item/title_18-chapter_18_544-article_iii-18_544_270)

[https://library.qcode.us/lib/san\\_dimas\\_ca/pub/municipal\\_code/item/title\\_18-chapter\\_18\\_156-18\\_156\\_080](https://library.qcode.us/lib/san_dimas_ca/pub/municipal_code/item/title_18-chapter_18_156-18_156_080)