



November 29, 2021

Megan Kirkeby, Deputy Director
Housing Policy Development
Department of Housing and Community Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833


RE: City of Covina Draft 6th Cycle Housing Element

Dear Ms. Kirkeby:

Enclosed for your review is the City of Covina's Draft Housing Element for the 6th planning cycle. We look forward to receiving your comments on the draft element.

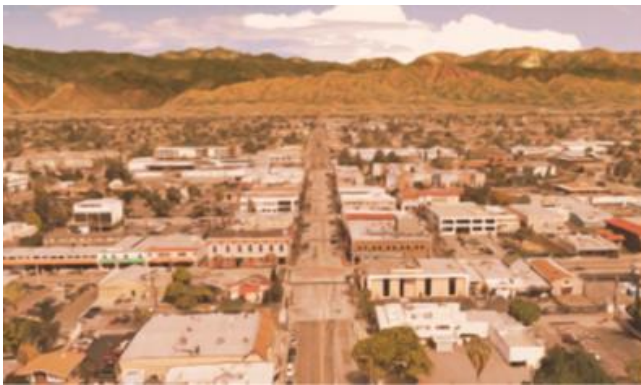
If you have any questions please contact Nancy Fong at NFong@covinaca.gov, John Douglas at John@JHDPlanning.net, or me at blee@covinaca.gov.

Sincerely,
CITY OF COVINA


Brian K. Lee, AICP

Director of Community Development

Attachment: Draft Covina 6th Cycle Housing Element



CITY OF COVINA

2021-2029 HOUSING ELEMENT



Draft

November 2021

City Council Resolution CC

ACKNOWLEDGEMENTS

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I. EXECUTIVE SUMMARY

Housing Elements have been a required component of city General Plans since 1969. State requirements for Housing Elements 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.

In recent years, as California has gradually recovered from the “Great Recession” population and job growth have outpaced housing development, leading to a supply/demand imbalance, rising housing prices and rents, and affordability problems, particularly for families of modest means. While the causes of the affordability problem are complex, cities play an important role in addressing this issue. Through their planning and land use regulatory powers, local governments can have a substantial effect on housing supply and affordability, and the related problem of homelessness.

In addition to encouraging additional housing development to support the growing population and economy, State law establishes other priorities such as economic and environmental sustainability. A major strategy in pursuing these objectives is to encourage compact development patterns that make efficient use of existing infrastructure and minimize the time, cost and environmental impacts of transportation.

As a component of Covina's General Plan, this Housing Element focuses on establishing policies and programs to facilitate the provision of additional housing commensurate with the city's needs in a manner that supports sustainability objectives while complementing the City's history and context.

Consistent with the General Plan Land Use Element, the major feature of the City's overall housing strategy is transformation of the Town Center area surrounding the Covina Metrolink station to a vibrant mixed-use area that provides a wide range of opportunities for housing, jobs, services and entertainment for all segments of the population. The Town Center Specific Plan provides specific policies and regulations to implement that vision.

Pursuant to the requirements of State law, this Housing Element includes the following sections:

- An Introduction providing background information and context for the Housing Element (Chapter II)
- An analysis of the city's demographic and housing characteristics and trends (Chapter III)
- An evaluation of resources and opportunities available to address housing issues (Chapter IV)

- A review of potential market, governmental, and environmental constraints to meeting housing needs (Chapter V)
- The Housing Action Plan for the 2021-2029 planning period (Chapter VI)
- 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 opportunities for public participation during the preparation and adoption of this Housing Element (Appendix C)

Additional information related to this Housing Element and other components of the City's planning program may be found on the Covina website at: <https://covinaca.gov/pc>

II. INTRODUCTION

A. Community Context

Covina is a mature, suburban community located in the easterly portion of the San Gabriel Valley approximately 23 miles east of downtown Los Angeles. The city is bounded by a number of other incorporated cities that include West Covina on the south, Baldwin Park on the west, Azusa and Glendora on the north, and San Dimas on the east. In addition, numerous unincorporated portions of Los Angeles County are found adjacent to the city and within Covina's designated sphere of influence. The City's regional location is shown in **Figure II-1** while the City boundaries and Sphere of Influence are shown in **Figure II-2**.

The area that would eventually become the City of Covina was first settled in the late 1880s. Covina became an incorporated city in 1901 and is one of the oldest cities in Los Angeles County. Covina has a diverse variety of housing types that reflects its long history beginning as a farming community up to its largely suburban character at the present time. The planning area that is governed by the Housing Element has a total land area of approximately seven square miles.

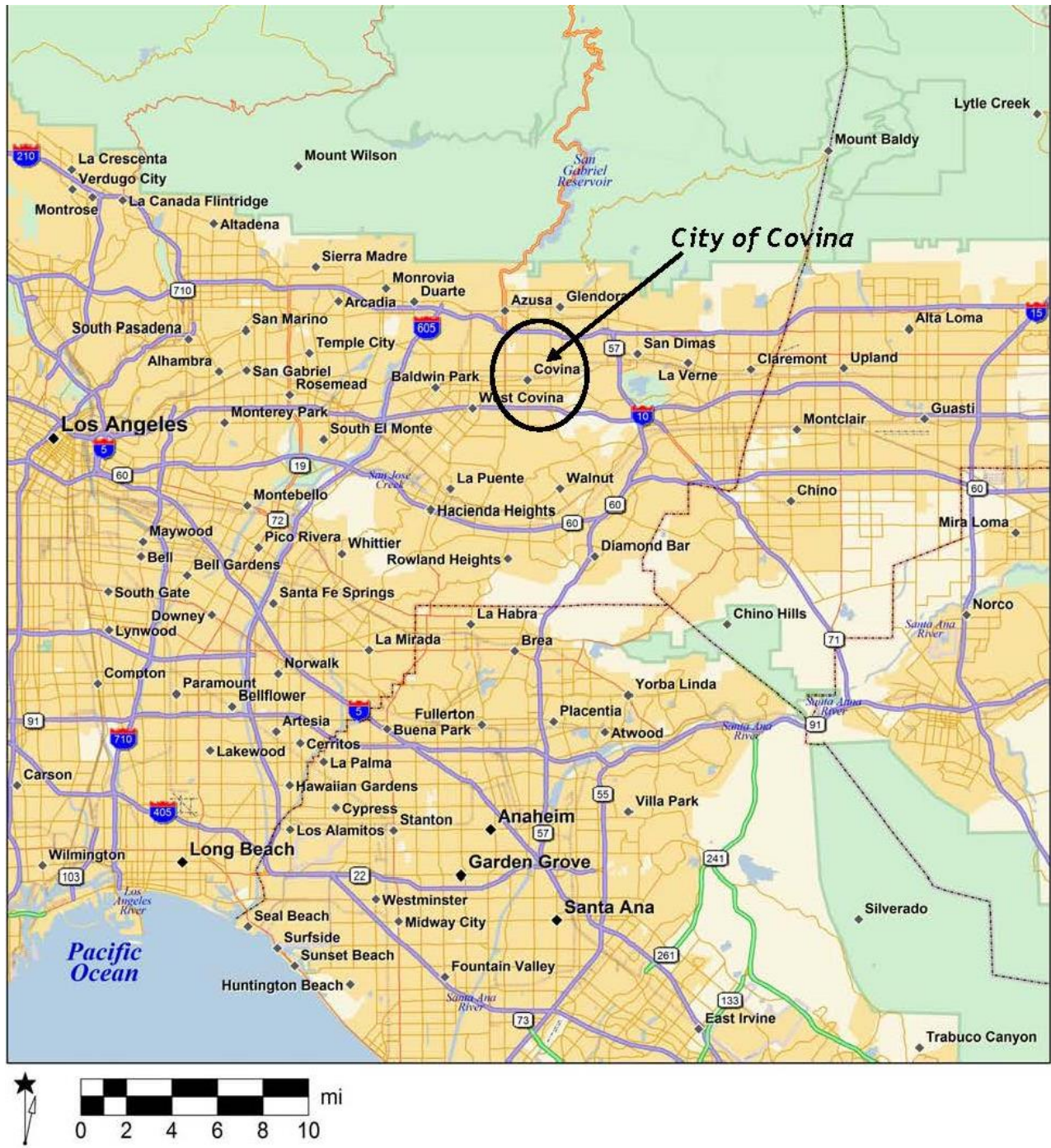
Covina was largely a rural agricultural community prior to 1950s. The early residents strived to maintain a small-town atmosphere by placing homes, businesses, and places of employment within a single square mile area that in turn, was surrounded by citrus groves and agricultural uses. The postwar suburban expansion that occurred in the Southern California region contributed to significant growth in Covina in the 1950s. In recent decades, virtually all of the remaining vacant land in the city has been developed. The majority of the city's population growth that has occurred since 1970 has been largely due to annexations and newer infill development where lower-density residential development (largely single-family homes) was replaced by higher-density townhomes, condominiums, and apartments.

B. Role of Housing Element

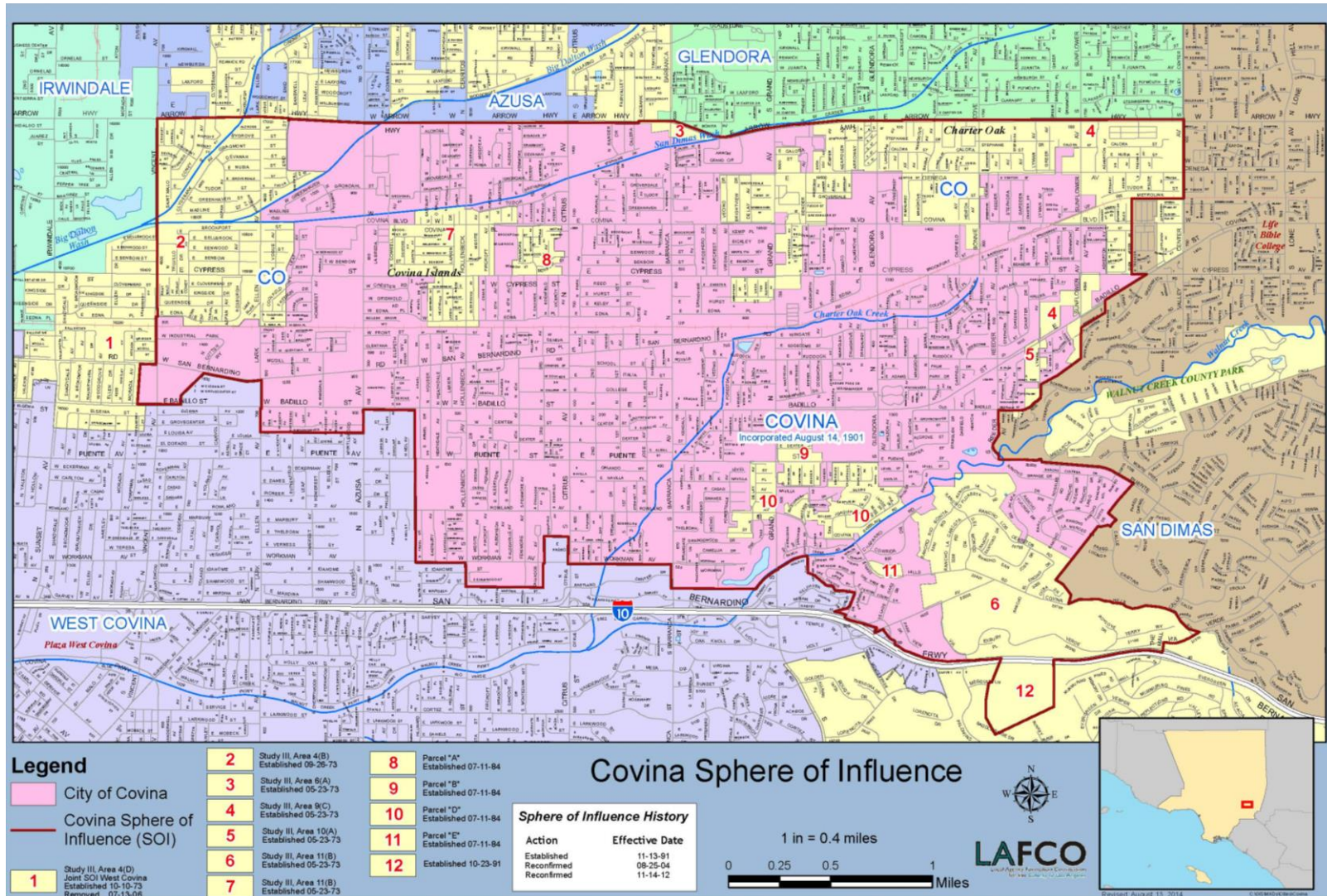
Covina is faced with various important housing issues that include a balance between employment and housing opportunities, preserving existing neighborhoods, and providing sufficient opportunities for new housing to accommodate growth and the changing population.

Pursuant to State law, this Housing Element is an eight-year plan for the period 2021-2029. As described in Chapter V, policies and programs are identified that focus on: 1) conserving and improving existing affordable housing; 2) facilitating housing production in all income levels to accommodate growth; 3) encouraging home ownership for first-time buyers and households of low and moderate income; 4) mitigating constraints to housing for households of all economic levels and persons with disabilities; and 5) promoting equal housing opportunities.

**Figure II-1
Regional Location**



**Figure II-2
Covina City Boundaries and Sphere of Influence**



The following chapters include the following major components:

- An analysis of the city's demographic and housing characteristics and trends (Chapter III);
- An evaluation of resources and opportunities available to address housing issues (Chapter IV);
- A review of potential market, governmental, and environmental constraints to meeting housing needs (Chapter V);
- The Housing Action Plan for the 2021-2029 planning period (Chapter VI); and
- A review of accomplishments during the previous planning period (Appendix A).
- An inventory of the potential sites for housing development (Appendix B)
- Appendix C describes opportunities for public participation during the preparation and adoption of this Housing Element

C. Information Sources

In preparing the Housing Element, a wide variety of data sources were consulted. The U.S. Census and American Community Survey data provide the basis for population and household characteristics. The Census remains the most comprehensive and widely accepted source of information on demographic characteristics. Other sources of information are used to supplement Census data, and include:

- Population and demographic data provided by the State Department of Finance;
- Housing market information, such as home sales, rents, and vacancies;
- Local public and nonprofit agency information on special needs populations, services available to them, and gaps in the system;
- Information on housing conditions based on City planning and code enforcement activities.

D. Public Participation

Residents as well as members of business and civic groups participated in the Housing Element update process. Please refer to Appendix C for further information regarding the public participation program.

E. Relationship to Other General Plan Elements

In addition to the Housing Element, the Covina General Plan is comprised of the following elements: Land Use; Circulation; Natural Resources and Open Space; Safety; and Noise. This Housing Element supports the policies of the other General Plan elements. For

example, residential development policies established in the Land Use Element are reflected in the Housing Element, and the analysis of environmental constraints in the Housing Element is based upon information from the Natural Resources and Open Space, Safety and Noise Elements.

As the General Plan is amended from time to time, the Housing Element will be reviewed and amended as necessary to maintain consistency with other elements of the General Plan.

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III. HOUSING NEEDS ASSESSMENT

This chapter examines general population and household characteristics and trends, such as age, race and ethnicity, employment, household composition and size, household income, and special needs. Characteristics of the existing housing stock (e.g., number of units and type, tenure, age and condition, costs) are also addressed. Finally, the city's projected housing growth needs based on the 2021-2029 Regional Housing Needs Assessment (RHNA) are examined.

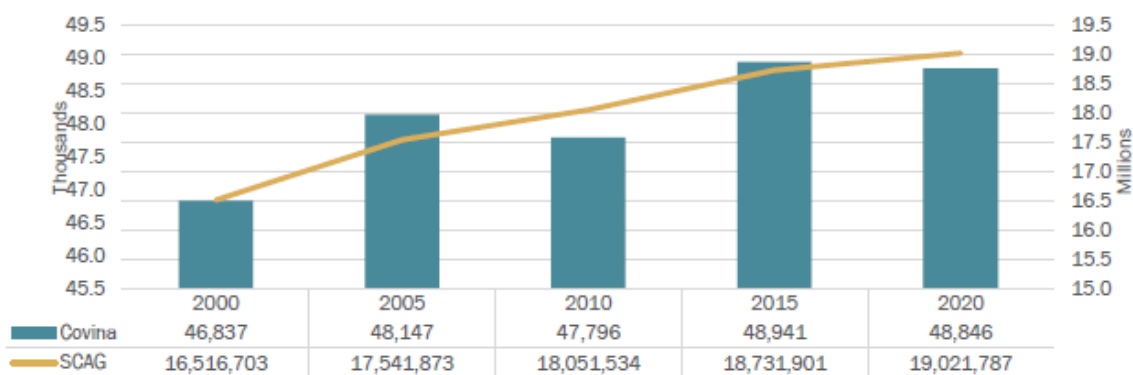
The Housing Needs Assessment utilizes recent data from the U.S. Census, California Department of Finance (DOF), California Employment Development Department (EDD), Southern California Association of Governments (SCAG) and other relevant sources.

A. Population Characteristics

1. Population Growth Trends

Covina had an estimated total population of 48,846 in 2020 including 435 persons living in group quarters according to the California Department of Finance. Population trends for Covina and the SCAG region as a whole during 2000 to 2020 are shown in **Table III-1**. Over this period Covina had an annual growth rate of 0.2% compared to 0.7% for the region. Covina's slow growth rate reflects the fact that it is a mature city with a relatively small amount of vacant land available for development.

Table III-1
Population Trends 2000-2020 –
Covina vs. SCAG Region



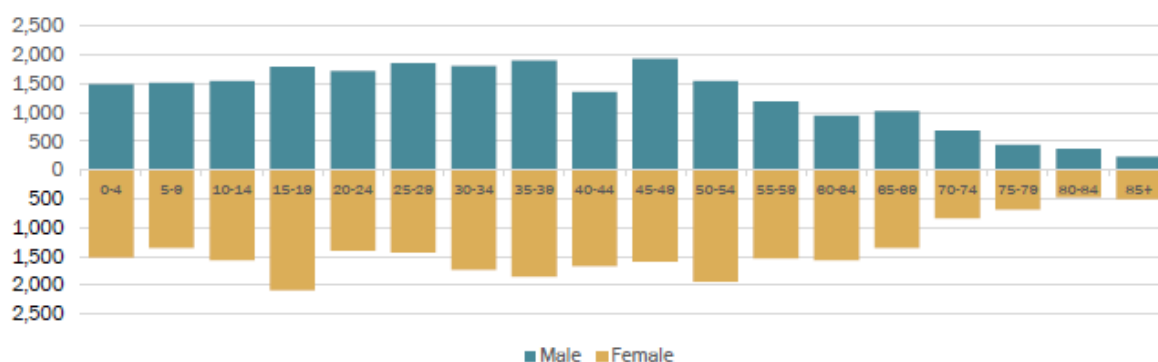
CA DOF E-5 Population and Housing Unit Estimates

2. Age

Housing needs are influenced by the age characteristics of the population. Different age groups require different accommodations based on lifestyle, family type, income level, and housing preference. **Table III-2** shows the city's population by age group and gender.

According to recent Census estimates the population of Covina is approximately 48.3% male and 51.7% female. The share of the population of Covina under 18 years of age is 23.4%, which is higher than the regional share of 23.4%. Covina's seniors (65 and above) make up 13.6% of the population, which is slightly higher than the regional share of 13%.

Table III-2
Age Distribution by Gender –
Covina



American Community Survey 2014-2018 5-year estimates

B. Household Characteristics

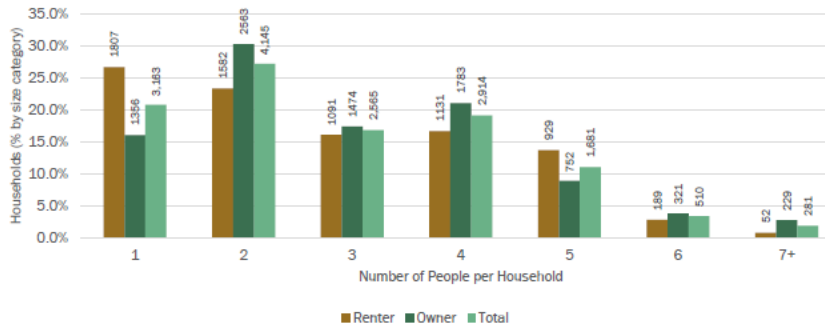
1. Household Composition and Size

Household characteristics are important indicators of the type and size of housing needed in a city. The Census defines a “household” as all persons occupying a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons sharing a single unit. Persons in group quarters such as dormitories, retirement or convalescent homes, or other group living situations are included in population totals but are not considered households.

Table III-3 illustrates the range of household sizes in Covina for owners, renters, and overall. The most commonly occurring household size is of two people (27.2%) and the second-most commonly occurring household is of one person (20.7%). Covina has a lower share of single-person households than the SCAG region overall (20.7% vs. 23.4%) and a lower share of 7+ person households than the SCAG region overall (1.8% vs. 3.1%).

**Table III-3
Household Composition –
Covina vs. Los Angeles County**

Households by Household Size

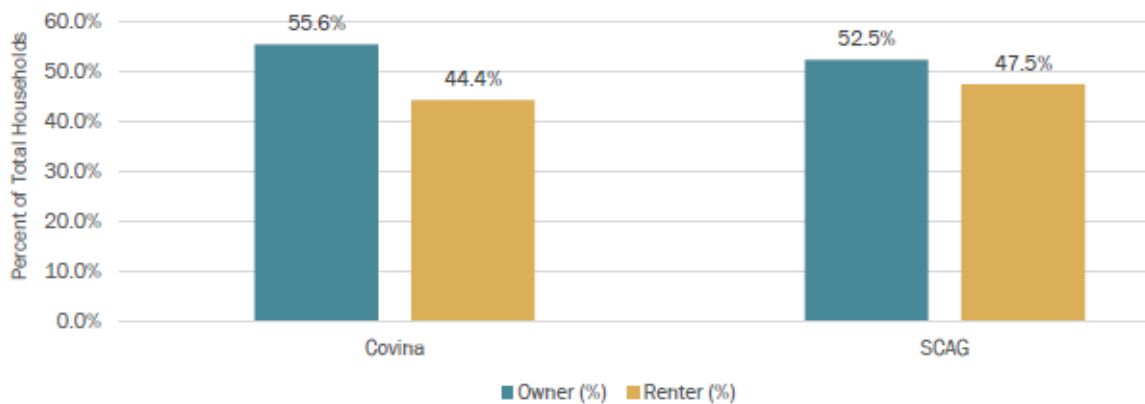


American Community Survey 2014-2018 5-year estimates.

2. Housing Tenure and Vacancy

Housing tenure (owner versus renter) is an important indicator of the housing market. Communities need an adequate supply of units available both for rent and for sale to accommodate a range of households with varying income, family size and composition, and lifestyle. **Table III-4** provides a comparison of owner-occupied and renter-occupied units in Covina as compared to the SCAG region as a whole. Census estimates reveal that approximately 56% of Covina's housing stock is owner-occupied compared to about 53% for the SCAG region overall.

**Table III-4
Household Tenure –
Covina vs. SCAG Region**

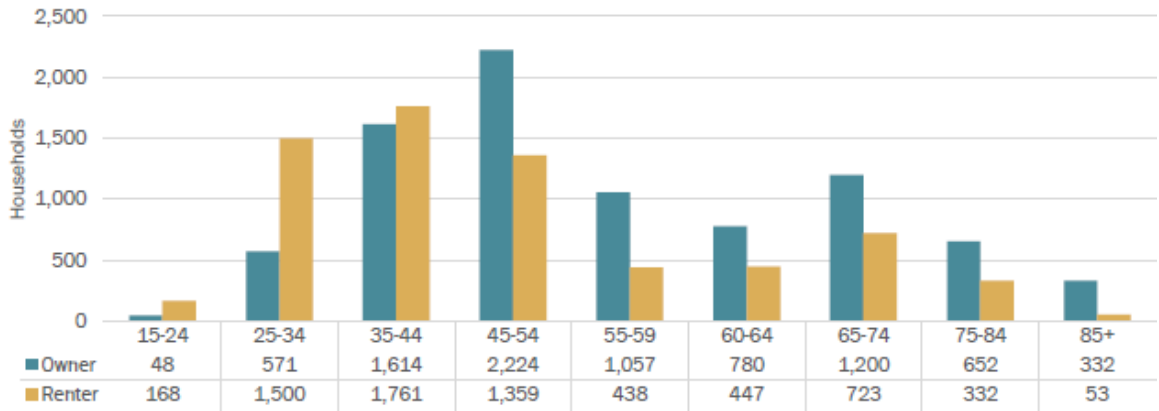


American Community Survey 2014-2018 5-year estimates.

Homeownership rates generally increase as people grow older. As shown in **Table III-5**, homeowners in Covina outnumber renters among persons over age 45.

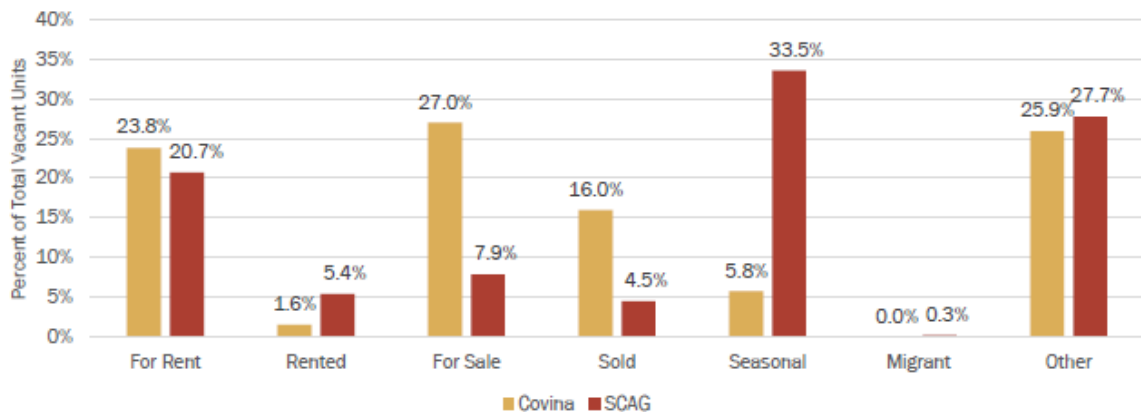
Vacancy characteristics for Covina and the SCAG region as a whole are illustrated in **Table III-6**. The largest proportion of vacant units in Covina are homes for sale while seasonal vacancies are most common in the region as a whole.

**Table III-5
Household Tenure by Age –
Covina**



American Community Survey 2014-2018 5-year estimates.

**Table III-6
Vacant Units by Type –
Covina vs. SCAG Region**

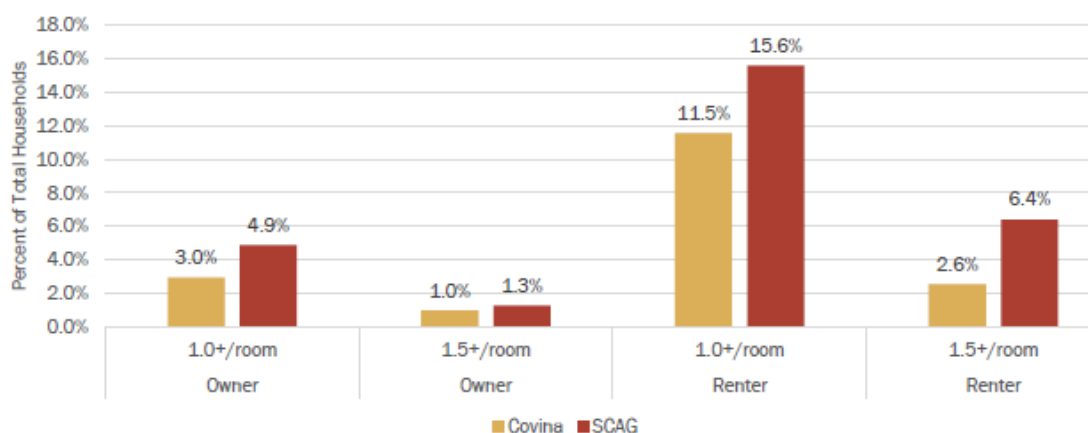


American Community Survey 2014-2018 5-year estimates.

3. Overcrowding

Overcrowding is often closely related to household income and the cost of housing. The U.S. Census Bureau considers a household to be overcrowded when there is more than one person per room, excluding bathrooms and kitchens, and severely overcrowded when there are more than 1.5 occupants per room. **Table III-7** summarizes the incidence of overcrowding in Covina as compared to the SCAG region as a whole. In Covina, about 3% of owner-occupied households and 12% of renter-occupied households were overcrowded while severe overcrowding affected about 1% of owner households and 3% of renter households. Among both owners and renters, overcrowding is less prevalent in Covina than in the region as a whole.

**Table III-7
Overcrowding by Tenure –
Covina vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

4. Extremely-Low-Income Households

Extremely-low-income (ELI) is defined as less than 30% of area median income. Housing the ELI population can be especially challenging. HUD's CHAS data shows that the racial/ethnic group with the highest share of ELI households in Covina is Hispanic (14.5% compared to 12.8% 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). ELI households are much more likely to be renters than the population as a whole (**Table III-8**).

Table III-8
Extremely-Low-Income Households -
Covina

	Total Households	Households below 30% HAMFI	Share below 30% HAMFI
White, non-Hispanic	5,065	645	12.7%
Black, non-Hispanic	692	55	7.9%
Asian and other, non-Hispanic	2,110	189	9.0%
Hispanic	7,315	1,060	14.5%
TOTAL	15,182	1,949	12.8%
Renter-occupied	6,890	1,360	19.7%
Owner-occupied	8,285	580	7.0%
TOTAL	15,175	1,940	12.8%

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

5. Overpayment

According to State housing policy, overpaying occurs when housing costs exceed 30% of gross household income. **Table III-9** displays recent estimates for overpayment for Covina households by income category. As shown in this table, overpayment is much more prevalent among lower-income households.

Table III-9
Overpayment by Income Category – Covina

Income	Households by Share of Income Spent on Housing Cost:		
	< 30%	30-50%	> 50%
< 30% HAMFI	160	150	1,530
30-50% HAMFI	635	925	715
50-80% HAMFI	1,530	1,400	425
80-100% HAMFI	1,090	464	30
> 100% HAMFI	5,425	589	20
Total Households	8,840	3,528	2,720

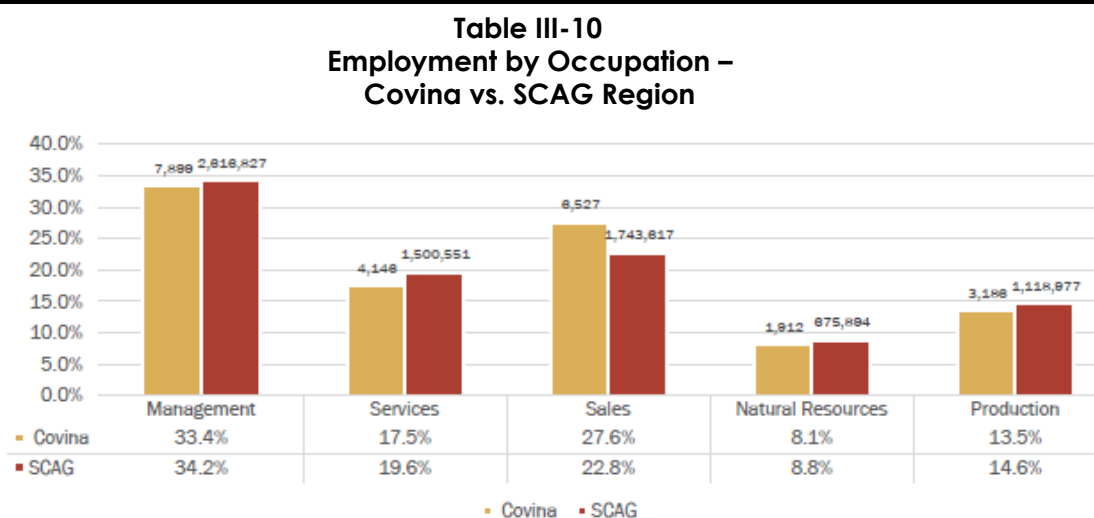
HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For lower-income renters, severe cost burdens can require families to double up resulting in overcrowding and related problems.

C. Employment Characteristics

Employment is an important factor affecting housing needs within a community. The jobs available in each employment sector and the wages for these jobs affect the type and size of housing residents can afford.

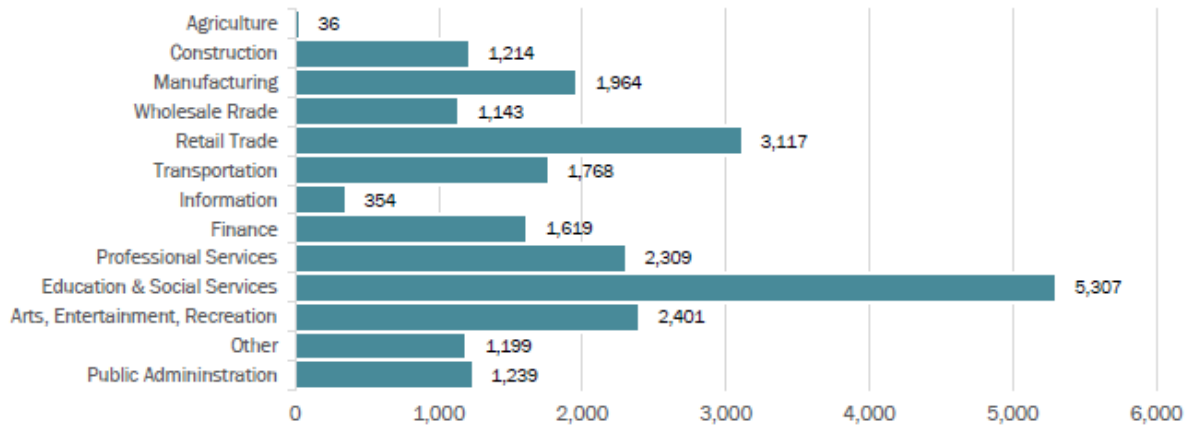
Table III-10 shows that the most prevalent occupational category in Covina is Management, in which 7,899 (33.4% of total) employees work. The second-most prevalent type of work is in Sales, which employs 6,527 (27.6% of total) in Covina.



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

Recent Census estimates (**Table III-11**) reported that Covina has 23,670 workers living within its borders who work across 13 major industrial sectors. The most prevalent industry is Education & Social Services with 5,307 employees (22.4% of total) and the second most prevalent industry is Retail trade with 3,117 employees (13.2% of total).

**Table III-11
Employment by Industry – Covina**



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

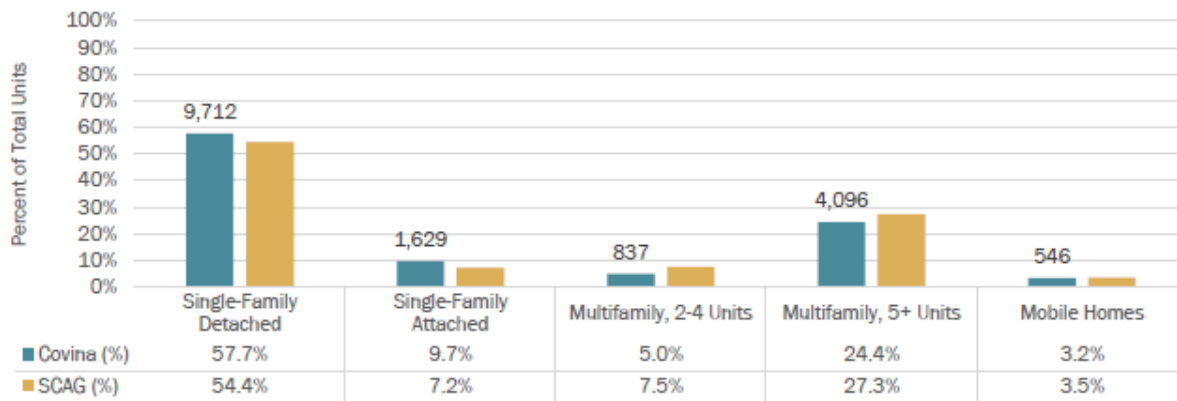
D. Housing Stock Characteristics

This section reviews the characteristics of Covina's housing stock and helps in identifying and prioritizing needs. The factors evaluated include the number and type of housing units, housing age and condition, housing costs and affordability, and assisted affordable units at risk of loss due to conversion to market-rate. As defined by the Census Bureau, a housing unit is a house, apartment, mobile home, or group of rooms occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters.

1. Housing Type and Growth Trends

As shown in **Table III-12** the most prevalent housing type in Covina is single-family detached with about 58% of units. When single-family attached units are included, the share of all single-family units in Covina is about 67%, which is higher than the 62% share in the SCAG region as a whole. The average household size (as expressed by the population to housing unit ratio) is approximately 3.0.

**Table III-12
Housing by Type –
Covina vs. SCAG Region**

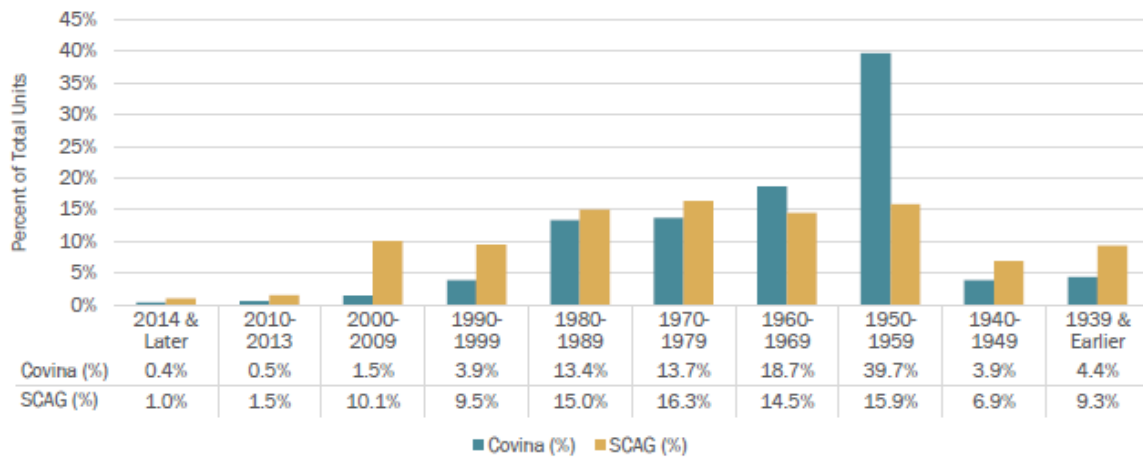


CA DOF E-5 Population and Housing Unit Estimates

2. Housing Age and Conditions

Housing age is often an important indicator of housing condition. Housing units built prior to 1978 before stringent limits on the amount of lead in paint were imposed may have interior or exterior building components coated with lead-based paint. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in a deteriorated condition. Lead-based paint becomes hazardous to children under age six and to pregnant women when it peels off walls or is pulverized by windows and doors opening and closing.

**Table III-13
Age of Housing Stock –
Covina vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

Table III-13 shows the age distribution of the housing stock in Covina compared to the SCAG region as a whole. This table shows that about two-thirds of housing units in Covina were constructed before 1970. 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. City Code Enforcement staff estimates that approximately 30% of housing units in the city are in need of some repair or rehabilitation. As described in Chapter VI, Program 1.2, the Residential Rehabilitation Program provides funding assistance to low- to moderate-income homeowners for home repairs.

3. Housing Cost

Housing Affordability Criteria

State law establishes five income categories for purposes of housing programs based on the area (i.e., county) median income ("AMI"): extremely-low (30% or less of AMI), very-low (31-50% of AMI), low (51-80% of AMI), moderate (81-120% of AMI) and above moderate (over 120% of AMI). Housing affordability is based on the relationship between household income and housing expenses. According to HUD and the California Department of Housing and Community Development (HCD) housing is considered "affordable" if monthly cost, including utilities, is no more than 30% of a household's gross income. In some areas such as Los Angeles County, these income limits may be increased to adjust for high housing costs.

Table III-14 shows affordable rent levels and estimated affordable purchase prices for housing in Covina (and Los Angeles County)¹ by income category. Based on State-adopted standards, the maximum affordable monthly rent for extremely-low-income households is \$886, while the maximum affordable rent for very-low-income households is \$1,478. The maximum affordable rent for low-income households is \$2,365, while the maximum for moderate-income households is \$2,400.

Maximum purchase prices are more difficult to determine due to variations in mortgage interest rates and qualifying procedures, down payments, special assessments, homeowner association fees, property insurance rates, etc. With this caveat, maximum home purchase prices by income category shown in **Table III-14** have been estimated based on typical conditions.

¹ Affordable rent and purchase prices are based on county median income as of 2021.

**Table III-14
Income Categories and Affordable Housing Costs –
Los Angeles County**

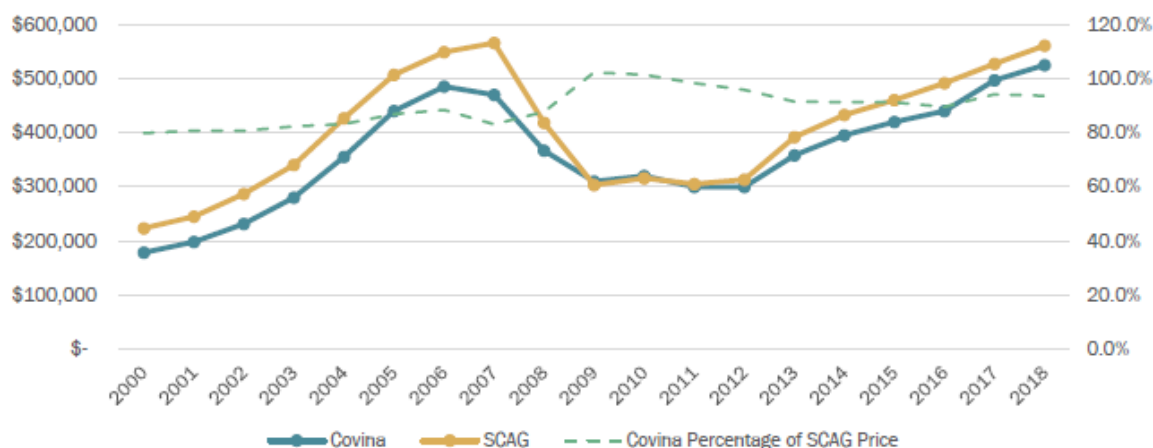
Income Category	Income Limits	Affordable Rent	Affordable Price (est.)
Extremely Low (<30%)	\$35,450	\$886	*
Very Low (31-50%)	\$59,100	\$1,478	*
Low (51-80%)	\$94,600	\$2,365	*
Moderate (81-120%)	\$96,000	\$2,400	\$375,000
Above moderate (120%+)	>\$96,000	>\$2,400	>\$375,000

Assumptions:
 -Based on a family of 4 and 2021 State income limits
 -30% of gross income for rent or PITI
 -10% down payment, 3.75% interest, 1.25% taxes & insurance, \$350 HOA dues
 Source: Cal. HCD; JHD Planning LLC

For-Sale Housing

Between 2000 and 2018, median home sales prices in Covina increased 195% while prices in the SCAG region increased 151%. 2018 median home sales price in Covina was \$525,000 and the highest experienced since 2000 was \$525,000 in 2018. Prices in Covina have ranged from a low of 79.8% of the SCAG region median in 2000 and a high of 102.3% in 2009 (Table III-15).

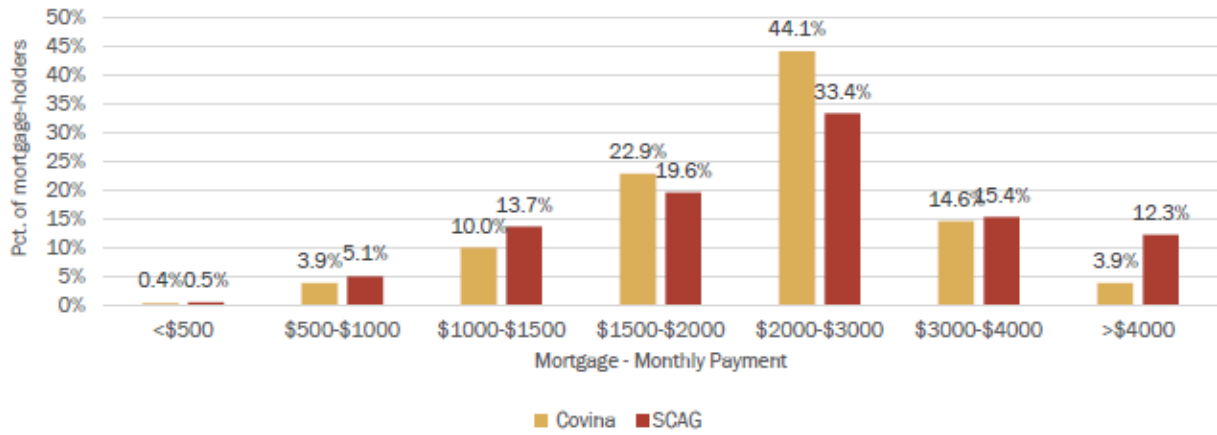
**Table III-15
Median Sales Price for Existing Homes 2000-2018 –
Covina vs. SCAG Region**



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

As shown in Table III-16, the most common monthly cost for homeowners in Covina and the region as a whole is \$2,000 to \$3,000.

Table III-16
Monthly Owner Costs for Mortgage Holders –
Covina vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

Rental Housing

Table III-17 shows that the most common share of income spent on rent in Covina is over 50%. About 53% of Covina's renter households spend 30% or more of gross income on housing cost, compared to about 55% in the SCAG region. About 24% of renter households in Covina spend 50% or more of gross income on housing cost, compared to about 29% in the SCAG region as a whole (**Table III-18**).

Table III-17
Percentage of Income Spent on Rent –
Covina

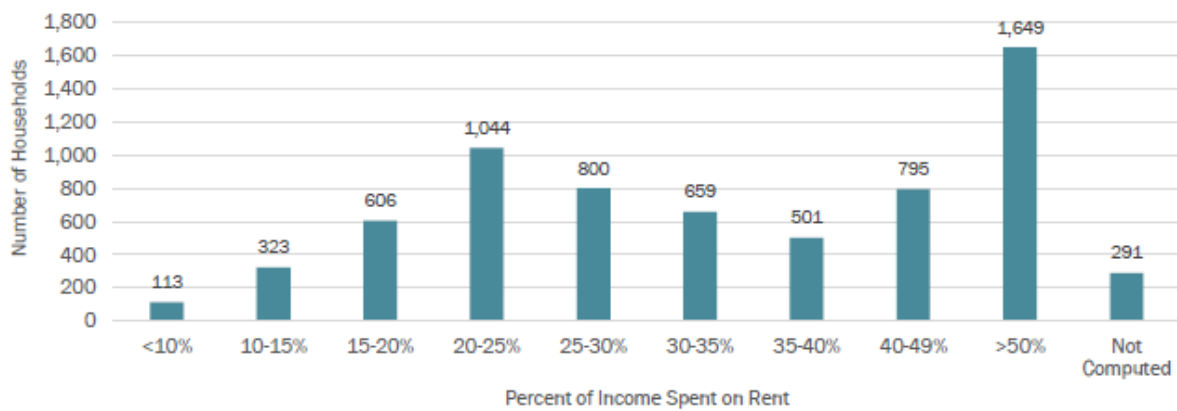
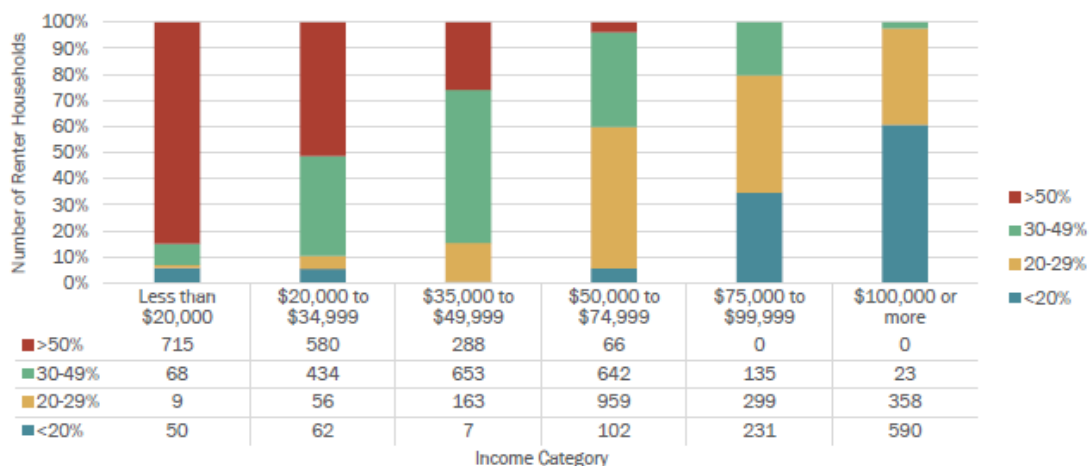


Table III-18
Rental Expense by Income Category –
Covina



American Community Survey 2014-2018 5-year estimates.

E. Special Needs

Certain groups have greater difficulty in finding decent, affordable housing due to special circumstances. Such circumstances may be related to one's employment and income, family characteristics, disability, or other conditions. As a result, some Covina residents may experience a higher prevalence of overpayment, overcrowding, or other housing problems.

State Housing Element law defines "special needs" groups to include persons with disabilities, the elderly, large households, female-headed households with children, homeless people, and farm workers. This section contains a discussion of the housing needs facing each of these groups.

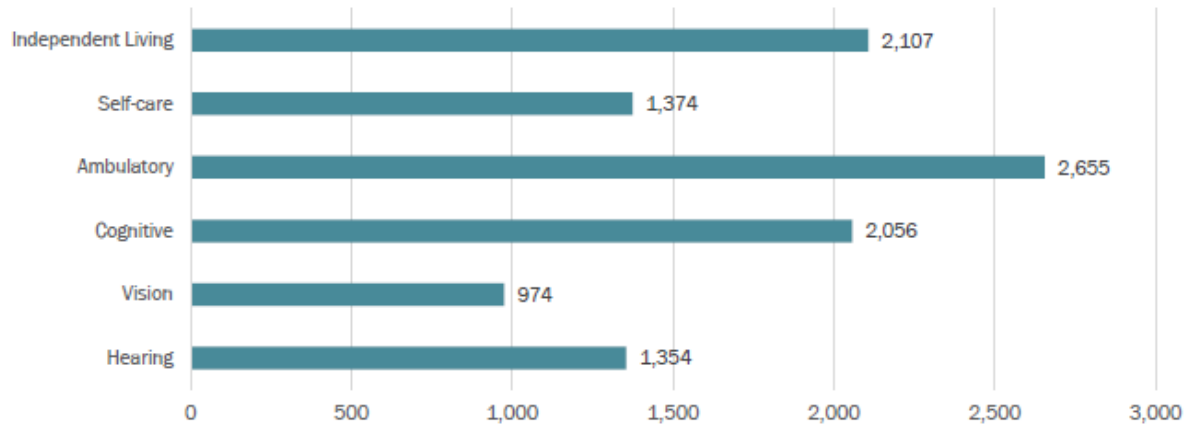
1. Persons with Disabilities

According to recent Census estimates, over 10% of non-institutionalized Covina residents reported some type of disability. The most commonly reported types of disabilities were ambulatory, independent living, and cognitive (**Table III-19**). As seen in **Table III-20** the most commonly occurring disability in Covina among seniors 65 and older was an ambulatory disability, experienced by about 24% of Covina's seniors and 23% of seniors in the SCAG region. Nearly half of Covina residents with a disability were in the labor force (**Table III-21**).

Housing opportunities for those with disabilities can be maximized through housing assistance programs and providing universal design features such as widened doorways, ramps, lowered countertops, single-level units and ground floor units. Many of the programs described in Chapter VI help to address the housing needs of persons with disabilities, such as Program 1.3 (Section 8 Rental Assistance), Program 2.3 (Accessory

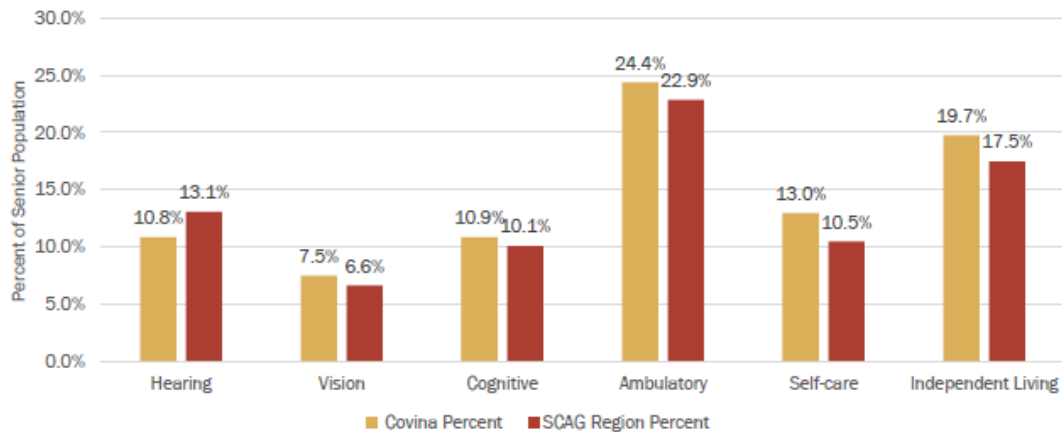
Dwelling Units), Program 2.4 (Housing for Low- and Moderate-income Households), Program 4.1 (Reasonable Accommodation for Persons with Disabilities), and Program 4.2 (Emergency Shelters and Transitional/Supportive Housing).

**Table III-19
Disabilities by Type –
Covina**



American Community Survey 2014-2018 5-year estimates.

**Table III-20
Disabilities by Type for Seniors 65+ –
Covina**



American Community Survey 2014-2018 5-year estimates.

**Table III-21
Disabilities by Employment Status –
Covina**

	With a Disability	Percent of Total	No Disability	Percent of Total
Employed	975	42%	21,758	77%
Unemployed	137	6%	1,482	5%
Not in Labor Force	1,216	52%	4,863	17%
TOTAL	2,328		28,103	

American Community Survey 2014-2018 5-year estimates.

Developmental Disabilities

As defined by federal law, “developmental disability” means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency; and
- Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities as a separate category of disability. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals 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, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The California 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 (SG/PRC) located in Pomona (<http://www.sgprc.org/>) provides services for people with developmental disabilities in the San Gabriel Valley area. The SG/PRC 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. The most recent SG/PRC caseload report identified 13,523 total consumers served in February 2019.² According to data compiled by the California Department of Developmental Services, approximately 950 persons with developmental disabilities were identified in Covina zip codes (91722, 91723 and 91724) as of December 2018.

There is no charge for diagnosis and assessment for eligibility. Once eligibility is determined, most services are free regardless of age or income. There is a requirement for parents to share the cost of 24-hour out-of-home placements for children under age 18. This share depends on the parents' ability to pay. There may also be a co-payment requirement for other selected services.

Regional centers are required by law to provide services in the most cost-effective way possible. They must use all other resources, including generic resources, before using any regional center funds. A generic resource is a service provided by an agency that has a legal responsibility to provide services to the general public and receives public funds for providing those services. Some generic agencies may include the local school district, county social services department, Medi-Cal, Social Security Administration, Department of Rehabilitation and others. Other resources may include natural supports. This is help that disabled persons may get from family, friends or others at little or no cost.

2. 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. Of Covina's 3,320 such households, about 23% earn less than 30% of the surrounding area income, (compared to 24% in the SCAG region), 41% earn less than 50% of the surrounding area income (compared to 31% in the SCAG region). Approximately 23% of elderly households fell within the extremely-low-income category (**Table III-22**). Many elderly persons are dependent on fixed incomes or have disabilities. Elderly homeowners may be physically unable to maintain their homes or cope with living alone. The housing needs of this group can be addressed through smaller units, second units on lots with existing homes, shared living arrangements, congregate housing and housing assistance programs. Many of the programs described in Chapter VI help to address the housing needs of seniors, such as Program 1.2 (Residential Rehabilitation), Program 1.3 (Section 8 Rental Assistance), Program 1.5 (Mobile Home Park Preservation), Program 2.3 (Accessory Dwelling Units), Program 2.4 (Housing for Low- and Moderate-income Households), and Program 4.1 (Reasonable Accommodation for Persons with Disabilities).

² https://www.dds.ca.gov/FactsStats/Caseload_Main.cfm

Table III-22
Elderly Households by Income and Tenure –
Covina

		Owner	Renter	Total	Percent of Total Elderly Households:
Income category, relative to surrounding area:	< 30% HAMFI	250	500	750	22.6%
	30-50% HAMFI	370	230	600	18.1%
	50-80% HAMFI	460	265	725	21.8%
	80-100% HAMFI	215	170	385	11.6%
	> 100% HAMFI	760	100	860	25.9%
TOTAL		2,055	1,265	3,320	

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

The elderly tend to have higher rates of disabilities than younger persons; therefore, many of the programs noted in the previous section also apply to seniors since their housing needs include both affordability and accessibility.

3. Large Households

Household size is an indicator of need for large units. Large households are defined as those with five or more members. Approximately 47% of owner households and 51% of renter households in Covina have only one or two persons. About 16% of owners and 19% of renter households were considered large households with 5 persons or more (**Table III-23**). This distribution indicates that the need for large units with four or more bedrooms is expected to be significantly less than for smaller units. However, large families needing more bedrooms generally face higher housing costs, and as a result may benefit from several types of assistance.

Table III-23
Household Size by Tenure –
Covina

Household Size	Owner		Renter	
	Households	%	Households	%
1 person	1,368	15.9%	1626	24.7%
2 persons	2,657	30.8%	1709	26.0%
3 persons	1,559	18.1%	1020	15.5%
4 persons	1,680	19.5%	999	15.2%
5 persons	787	9.1%	958	14.6%
6 persons	306	3.5%	170	2.6%
7 persons or more	264	3.1%	90	1.4%
Total Households	8,621	100%	6,572	100%

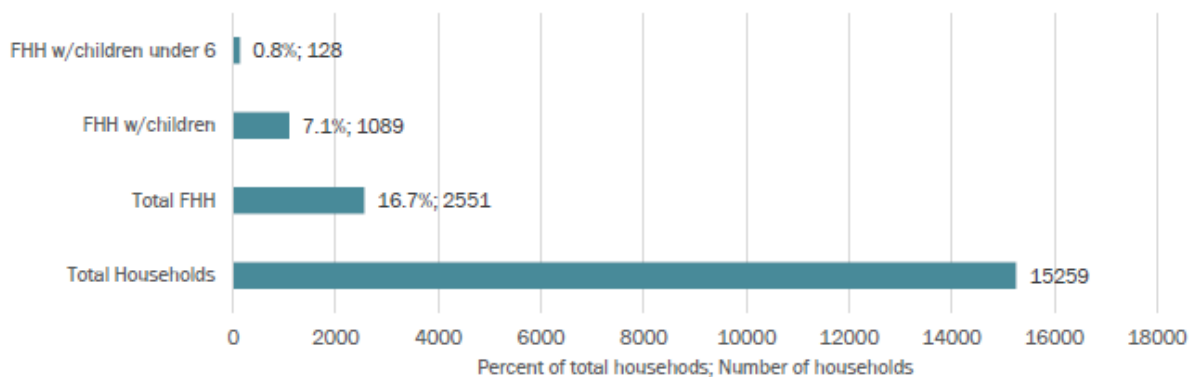
Source: U.S. Census 2013-2017 ACS, Table B25009

4. Female-Headed Households

Recent Census estimates reported that approximately 17% of Covina households are female-headed (compared to 14% in the SCAG region), about 7% are female-headed with children (compared to 7% in the SCAG region), and about 1% are female-headed with children under 6 (compared to 1% in the SCAG region) (**Table III-24**). About 4% of Covina's households are experiencing poverty, compared to 8 percent of households in the SCAG region. More than half of Covina's households living below the poverty line were female-headed (**Table III-25**). In 2018, a single individual under 65 was considered in poverty with an income below \$13,064/year while the threshold for a family consisting of 2 adults and 2 children was \$25,465/year.

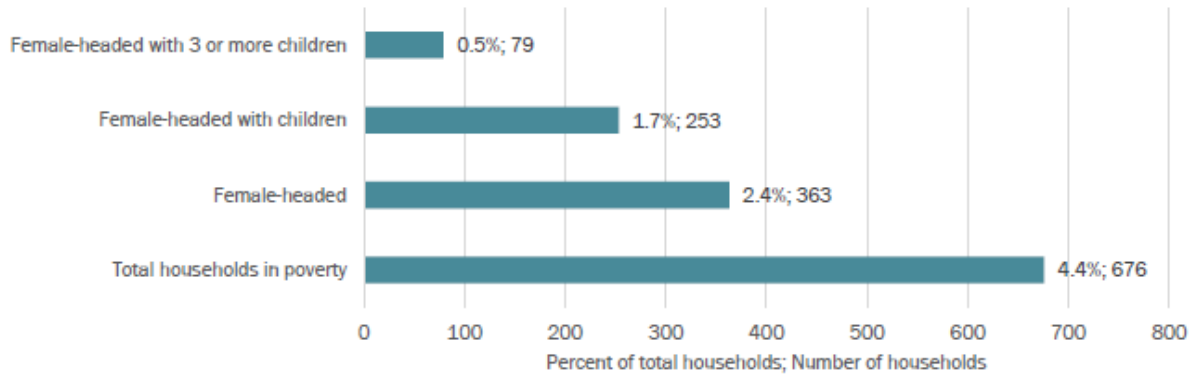
Female-headed households may face housing problems such as high cost burden and overcrowding due to issues such as income disparities and child care costs. Several of the programs described in Chapter VI help to address these housing needs, such as Program 1.3 (Section 8 Rental Assistance), Program 2.3 (Accessory Dwelling Units) and Program 2.4 (Housing for Low- and Moderate-income Households).

Table III-24
Female Headed Households –
Covina



American Community Survey 2014-2018 5-year estimates.

**Table III-25
Households by Poverty Status –
Covina**



American Community Survey 2014-2018 5-year estimates.

5. Farm Workers

Farm workers are traditionally defined as persons whose primary income is from seasonal agricultural work. According to recent Census Bureau estimates, about 36 Covina residents were employed in agriculture, forestry, fishing and hunting occupations (**Table III-26**).

**Table III-26
Agricultural Employment –
Covina**

Covina	Percent of total Covina workers:	SCAG Total	
36	0.15%	73,778	Total in agriculture, forestry, fishing, and hunting
36	0.21%	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.

The nearest major agricultural area to Covina is in San Bernardino County to the east. Since there are no major agricultural operations within Covina and housing costs are significantly lower in the Inland Empire, there is not a significant need for farmworker housing in the city. Programs described in Chapter VI that help to address the housing needs of persons with extremely low incomes, such as Program 1.3 (Section 8 Rental Assistance), Program 2.3 (Accessory Dwelling Units) and Program 2.4 (Housing for Low- and Moderate-income Households), also assist any farm workers who may reside in Covina.

6. Homeless Persons

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 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. 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 91 homeless persons in Covina in 2020.³

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, Covina cooperates with its sister cities to address the issue of homelessness.

The Covina Housing Authority owns and operates a seven-bed transitional house for homeless women and children, offering free accommodation to families, with case management and program oversight provided by Catholic Charities of Los Angeles, Inc. In addition, the YWCA San Gabriel Valley operates an 11-unit domestic violence shelter in Covina, offering a combination of shelter and transitional housing beds. The City of Covina is continuing to work cooperatively with the County and other San Gabriel Valley cities to facilitate the establishment of additional facilities and services to address the needs of the homeless population.

F. Assisted Housing at Risk of Conversion

This section identifies residential projects in Covina that are under an affordability restriction, along with those housing projects that are at risk of losing their low-income affordability restrictions within the ten-year period from 2021 to 2031. This information is used in establishing quantified objectives for units that can be conserved during this planning period. The inventory includes all units that have been assisted under any Federal, State or local programs.

³ <https://www.lahsa.org/documents?id=5201-homelessness-statistics-by-city.pdf>

Affordable housing projects in Covina are summarized in **Table III-27**. Two of these projects are at risk of conversion to market rate during the 2021-2031 time period.

Table III-27
Affordable Housing Developments –
Covina

Name	Location	Assisted Units	Total Units	Program	Expiration Date	Owner
Village Green	152 E. Covina Blvd.	140	140	RDA	2060	Profit motivated
Smith Family Trust Apts.	227 N. Citrus Avenue	12	12	RDA	2027	Profit motivated
Las Palmas Apts.	777 W. Covina Blvd.	10	103	RDA	2025	Profit motivated
Center Street Apts.	236 W. Center Street	2	10	RDA	2064	Profit motivated
Cienega Gardens	1211 N Lyman Ave	178	180	LIHTC	2057	Profit motivated
Covina Gardens	200 W Rowland St	89	90	RDA bond	2065	Profit motivated
Totals		431	535			

Sources: City of Covina, 2021

Smith Family Trust Apartments

In 1994 the Covina Redevelopment Agency approved a Participation Agreement with Smith Family Trust for the provision of 12 units for very-low-income seniors. In 2010 the Redevelopment Agency facilitated the sale of the building at 223 N. Citrus Avenue from Smith Family Trust to Casa Moreno Grill, LLC. The affordability covenant on this affordable housing runs until August 12, 2027.

Las Palmas Apartments

In 1995 the Covina Redevelopment Agency approved a rehabilitation agreement with the property owner for 103 apartment units at 777 W. Covina Boulevard. The Agency provided \$150,000 for the purchase of long-term affordability covenants on 10 units at 80% AMI for 30 years. The affordability covenants extend to December 31, 2025.

Preservation and Replacement Alternatives

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

Project Acquisition

The cost to acquire the 22 at-risk units is estimated to be approximately \$4 million to \$5 million but will depend on market conditions, property conditions, and other factors.

Rental Subsidies

The third option for preserving affordable units is to provide rental assistance. Rent subsidies could be structured similar to the Section 8 program, where HUD pays the difference between what tenants can afford (defined as 30% of household income) and HUD's estimates of the fair market rent. The feasibility of this alternative is highly dependent upon the availability of reliable funding sources necessary to make rent subsidies and the

willingness of property owners to participate in the program. The cost of subsidizing rents for 22 at-risk units is estimated to be approximately \$200,000 to \$400,000 per year based upon fair market rents and affordability levels.

Construction of Replacement Units

The construction of new low-income housing units is a costly means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends upon a variety of factors, including density, unit size, location, land costs, and type of construction. Assuming an average construction cost of \$400,000 per unit (including the cost of land), the total cost of developing 22 new low-income units is estimated to be approximately \$8 million.

Resources for Preserving At-Risk Units

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

G. Future Housing Needs

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

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

Covina's assigned share of regional housing need during the 2021-2029 planning period is 1,910 units. This need is distributed by income category as shown in **Table III-28**.

Table III-28
2021-2029 Regional Housing Needs –
Covina

Very Low*	Low	Moderate	Above Moderate	Total
614	268	281	747	1,910

*Per State law, half of the very-low units are assumed to be in the extremely-low category
Source: SCAG 2021

It should be noted that SCAG did not identify growth needs for the extremely-low-income category in the adopted RHNA. As provided in Assembly Bill (AB) 2634 of 2006, jurisdictions may determine their extremely-low-income need as one-half the need in the very-low category.

The inventory of land to accommodate the RHNA allocation is discussed in **Chapter IV - Resources and Opportunities**.

H. Fair Housing Assessment

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

There are three parts to this requirement:

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

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

Outreach

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

The City also created a dedicated web page for the Housing Element update (<https://covina.ca.gov/pc/page/housing-element>) and provided opportunities for interested persons to participate in public meetings remotely, which made it possible for those with disabilities limiting their travel to participate in the Housing Element update process regardless of their ability to physically attend the meetings.

Assessment of Fair Housing

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

Racial segregation. As seen in **Figure III-1**, the percentage of non-white population in the city is similar to the adjacent areas to the north, west and south and is somewhat lower than most areas to the east. This map does not indicate any patterns of substantial racial/ethnic concentration in the city.

Racially/Ethnically Concentrated Areas of Poverty (R/ECAP). A racially or ethnically concentrated area of poverty (R/ECAP) is defined by HUD as areas in which 50 percent or more of the population identifies as non-White and 40 percent or more of individuals are living below the poverty line. Recent Census estimates regarding poverty status of households in Covina and R/ECAP areas are shown in **Figure III-2**. As seen in this map, the poverty rate in the city ranges from less than 10% in some areas of the city and between 10% and 20% in other areas, which is similar to the surrounding cities., the percentage of non-white population in the city is similar to the adjacent areas to the north, west and south and is somewhat lower than most areas to the east. There are no R/ECAPs designated in Covina and this map does not indicate any patterns of substantial racial/ethnic concentration in the city.

Persons with disabilities. The incidence of disabilities in Covina is similar to the surrounding areas. As shown in **Figure III-3**, the percentage of residents reporting a disability ranges from less than 10% in some areas of the city and between 10% and 20% in other areas.

Access to opportunity. According to the 2020 California Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) Opportunity Area Map (**Figure III-4**), Covina is within the “Moderate Resource” and “High Resource” designations. These designations are determined by index scores for a variety of educational, environmental, and economic indicators, such as employment and proximity to jobs, access to effective educational opportunities for children and adults, concentration of poverty, and levels of environmental pollutants, among others.

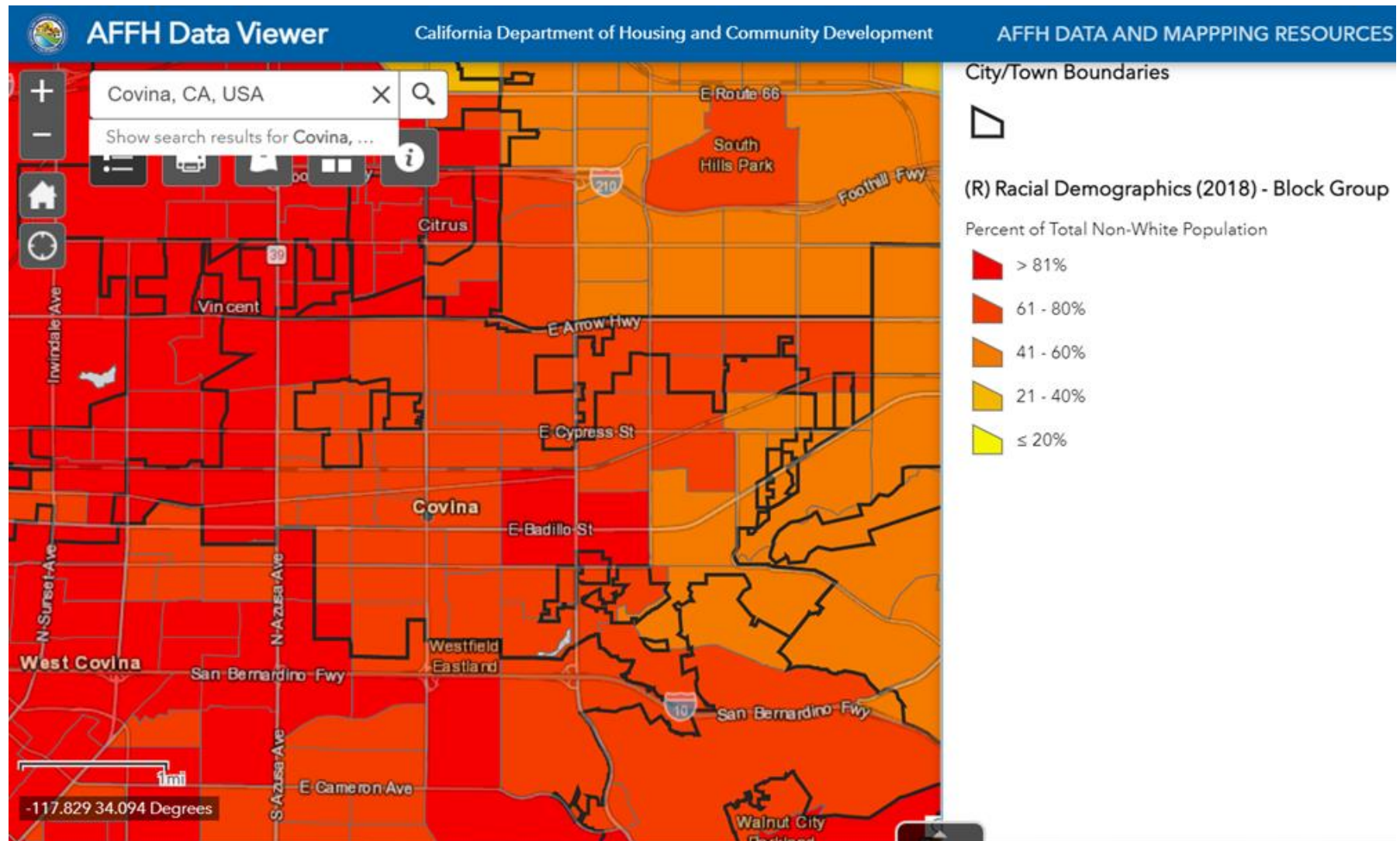
Conclusion

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

The Housing Plan includes several programs to encourage and facilitate affordable housing development, as well as the provision of accessory dwelling units, which can expand affordable housing opportunities for lower-income persons such as caregivers, household employees, and others working in service occupations. Program 5.1 describes

actions the City will take to affirmatively further fair housing and address any issues of housing discrimination that may arise.

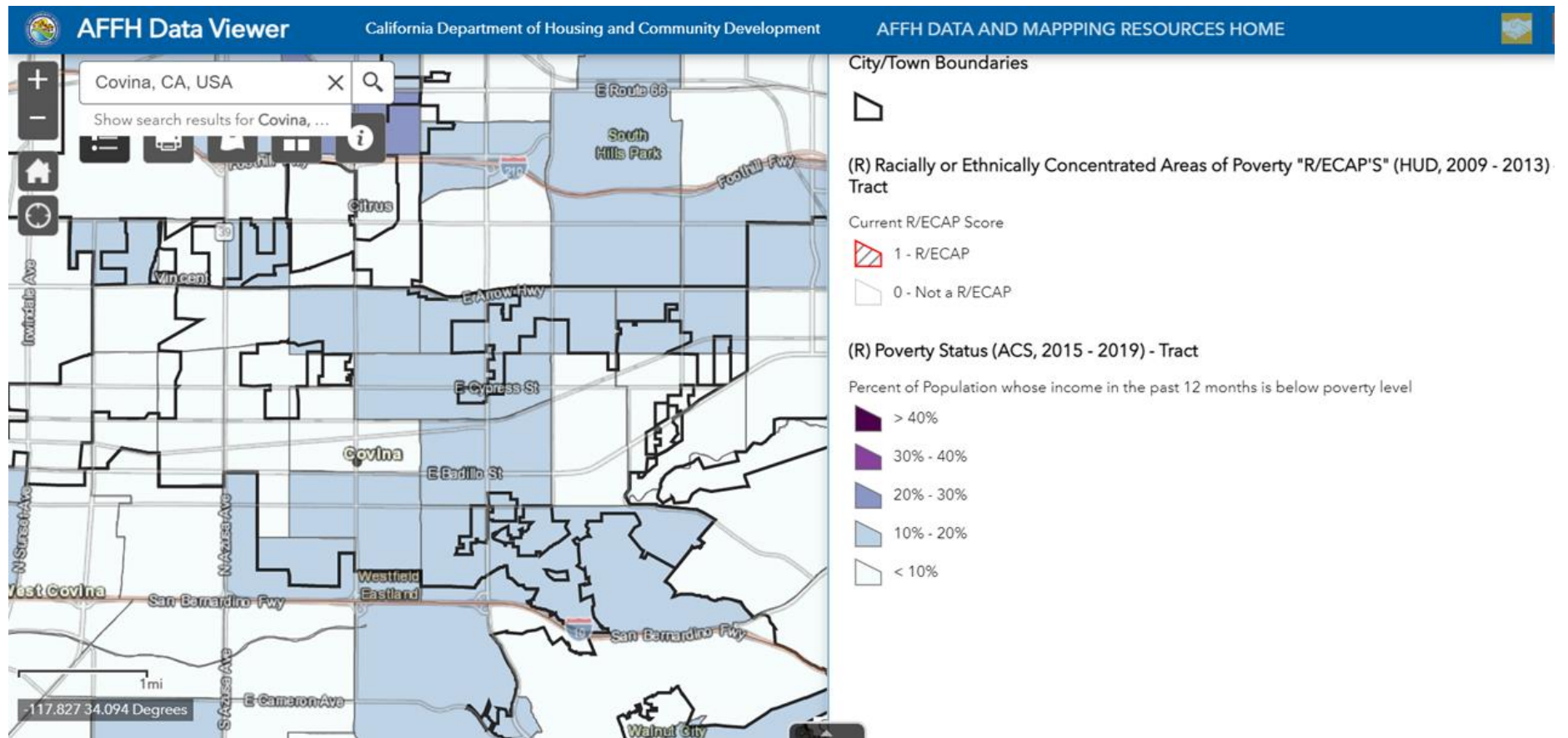
Figure III-1 Racial Characteristics – Covina



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

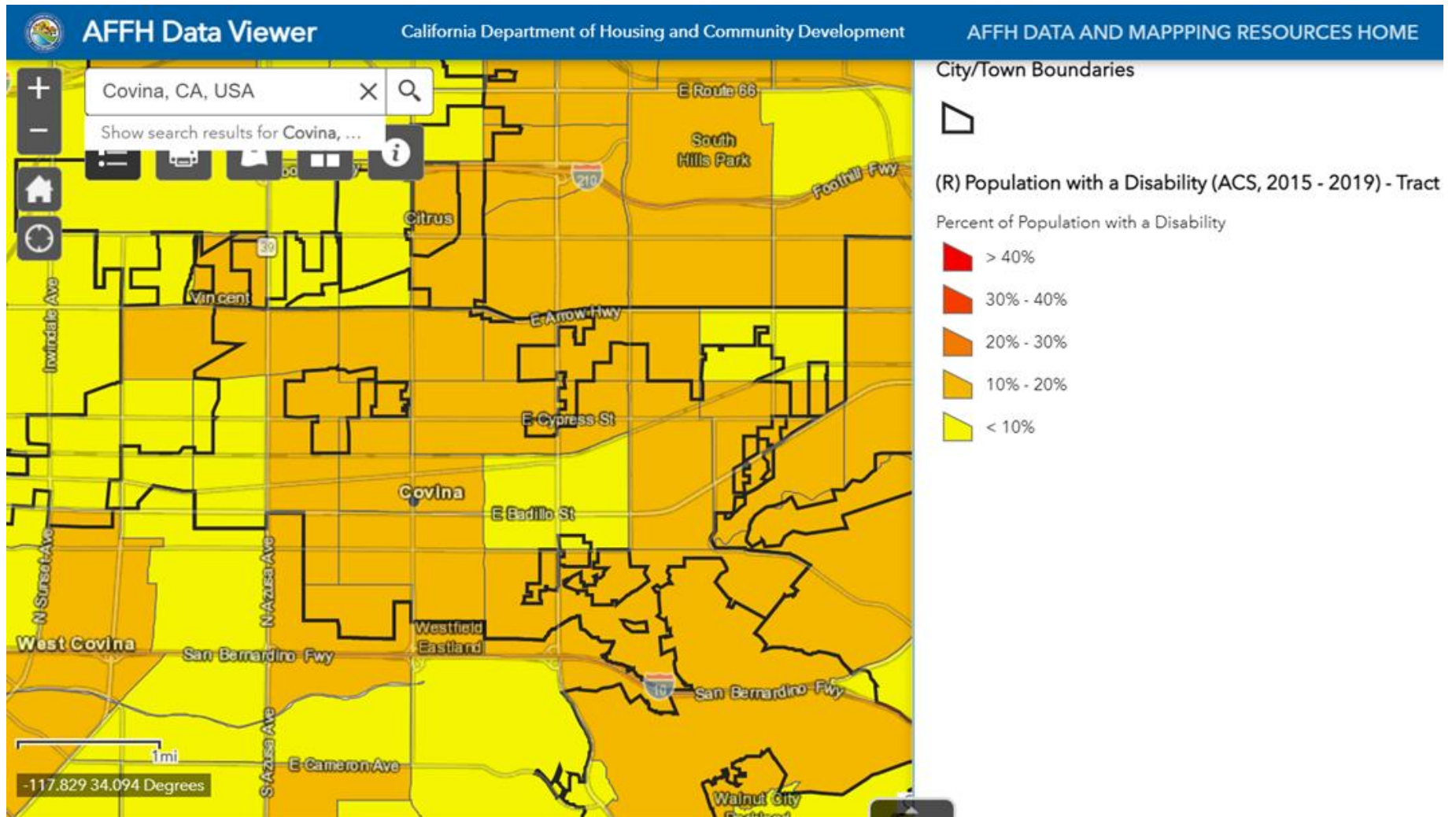
Note: For purposes of this analysis, the Hispanic category is included within the Total Non-White Population

Figure III-2 Poverty Status and Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) – Covina



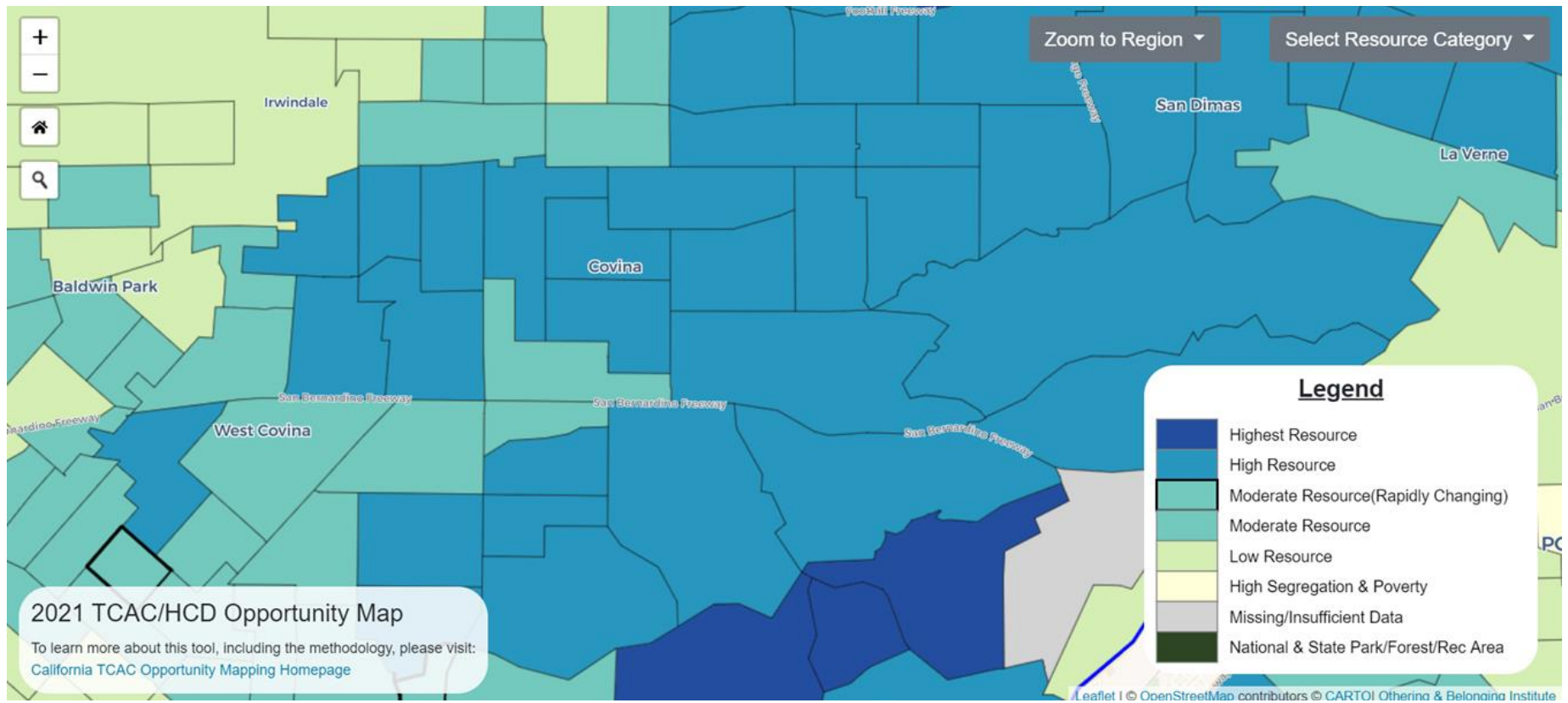
Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021

Figure III-3 Population with a Disability – Covina



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

Figure III-4 TCAC/HCD Opportunity Map – Covina



IV. RESOURCES AND OPPORTUNITIES

A variety of resources are available for the development, rehabilitation, and preservation of housing in the City of Covina; however, the State's elimination of redevelopment agencies in 2011 significantly reduced those resources requiring the transfer of \$3,407,292 in Covina housing funds to the State. This chapter describes the major resources for addressing the City's housing needs, including land, financial assistance and administrative resources. Additionally, opportunities for energy conservation that can lower utility costs and increase housing affordability are addressed.

A. Land Resources

Section 65583(a)(3) of the *Government Code* requires Housing Elements to contain an inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. A detailed analysis of vacant land and underutilized parcels with potential for intensification and/or reuse is provided in Appendix B, which shows that the current land inventory is not sufficient to accommodate the City's RHNA allocation for the planning period in all income categories. Program 2.1 in the Housing Plan (Chapter VI) describes actions the City will take to address this issue.

A discussion of public facilities and infrastructure needed to serve future development is contained in Section V. B, Non-Governmental Constraints. There are currently no known service limitations that would preclude the level of development described in the RHNA, although developers will be required to pay fees or construct public improvements prior to or concurrent with development.

B. Financial and Administrative Resources

1. State and Federal Resources

Community Development Block Grant Program (CDBG) - Federal funding for housing programs is available through the Department of Housing and Urban Development (HUD). Covina participates in the Community Development Block Grant (CDBG) program and receives its allocation of CDBG funds through the Los Angeles County Development Authority (LACDA). The CDBG program is very flexible in that the funds can be used for a wide range of activities. The eligible activities include, but are not limited to, acquisition and/or disposition of real property, public facilities and improvements, relocation, rehabilitation and construction of housing, homeownership assistance, public service programs, job creation programs, and clearance activities.

In Covina, the Housing Rehabilitation and Preservation Program relies upon CDBG funds residential repair and improvements for low- to moderate-income owner-occupied single-family detached homes and mobile homes. Covina's CDBG allocation for the FY 21-22 Program Year was \$295,465.

In 2017, the City contracted with the federal Department of Housing and Urban Development (HUD) through Los Angeles County for a Section 108 loan in the amount of \$2.5 million. These funds are guaranteed by the CDBG program and will require a commitment of approximately 50% of the current CDBG allocation in payment annually for twenty years. The funds were used to fund the construction of the senior portion of the new Covina Senior and Community Center, which opened to the public on August 5, 2019.

Section 8 Rental Assistance – The City of Covina cooperates with the Housing Authority of the County of Los Angeles (HACoLA), which administers the Section 8 Voucher Program. The Section 8 program provides rental assistance to low-income persons in need of affordable housing. There are two types of subsidies under Section 8: certificates and vouchers. A certificate pays the difference between the fair market rent and 30% of the tenant's monthly income, while a voucher allows a tenant to choose housing that may cost above the fair market figure, with the tenant paying the extra cost.

Low-Income Housing Tax Credit Program - The Low-Income Housing Tax Credit Program was created by the Tax Reform Act of 1986 to provide an alternate method of funding low-and moderate-income housing. Each state receives a tax credit, based upon population, toward funding housing that meets program guidelines. The tax credits are then used to leverage private capital for new affordable housing construction or acquisition and rehabilitation.

2. Local Resources

Covina Housing Authority – In 2011 the State legislature dissolved all California Redevelopment Agencies, which terminated the 20 percent set-aside funding from Covina Redevelopment Agency that was used to assist City housing programs. The Covina Housing Authority assumed the housing functions and assets of the dissolved Covina Redevelopment Agency. The Housing Authority provides the following assistance.

- Transitional House for Homeless Women and Children - In 2004 the Covina Redevelopment Agency purchased a home to serve as a transitional house for families who have been homeless and are in need of re-establishing a home. The Covina Housing Authority assumed the duties and functions of the Redevelopment Agency upon its dissolution and manages and maintains the house. A contracted service provider, Catholic Charities of Los Angeles, Inc. (CCLA) provides a comprehensive system of supportive services including case management, mainstream benefit linkage, income enhancement through employment resources and linkage, and permanent housing resources and placement. Upon entry, an Individual Service Plan is established for each household with stated goals to achieve in order to exit to permanent housing and increase their total income.

Housing is provided rent-free at the three-bedroom, three-bathroom residence. Two homeless families reside together in the home, sharing kitchen and living area facilities. The number to be served is estimated to be two adults and up to

5 children at any one time. The maximum length of stay of each family is 12 months and under certain circumstances, the length of stay may be extended. Under no circumstances will any family's length of stay exceed the maximum length of stay of 24-months for transitional housing. However, based on the needs of the individual families, four month's stay is the goal. The families are required to save a percentage of their income so that they will have funds to move on to permanent housing. Funding in FY 2021/22 will be continued with funding through the Covina Housing Authority, housing bond funds and City general funds.

- Domestic violence shelter (confidential location) - Under a FY 2010/11 agreement, the Covina Housing Authority subsidizes two transitional housing units in a local residence which houses victims of domestic violence, with income not to exceed 80 percent AMI, adjusted for household size. That subsidy is funded for a period of 10 years. In addition, funding was provided for rehabilitation of the residence and a covenant was recorded providing affordable rents for 7 transitional housing units (4 extremely-low-income, 2 very-low-income and 1 low-income) and 4 shelter units (3 extremely-low-income and 1 very-low-income) for 55 years.

Covina Plan to Address and Combat Homelessness - In 2017 the City of Covina received a \$30,000 grant from the County of Los Angeles to fund the preparation of a "City Plan to Combat Homelessness." Covina was one of 47 Los Angeles County cities that received a homeless planning grant. The City's grant funds were used to pay for a consultant to assist the City in preparing the *City Plan to Combat Homelessness*, which was completed in June 2018. This Plan:

- Assesses the resources currently available to the Covina to address the homeless challenge;
- Identifies opportunities for Covina to collaborate with the County of Los Angeles and neighboring cities on initiatives to address homelessness;
- Identifies how Covina can coordinate efforts and resources to collaborate with the County of Los Angeles and neighboring cities to achieve mutual goals; and
- establishes goals and supporting strategies and is available on the City website.

Measure H funding - The voters in Los Angeles County passed Measure H on March 7, 2017. The measure approved a quarter-cent sales tax to be collected for ten years which will produce approximately \$355 million each year to combat homelessness. The tax proceeds are deposited to a special account, created and maintained by Los Angeles County. The Impartial Analysis of Measure H on the ballot, by the Los Angeles County Counsel stated that "proceeds from the Tax will be used to generate ongoing funding to prevent and combat homelessness within Los Angeles County, including funding mental health, substance abuse treatment, health care, education, job training, rental and housing subsidies, case management and services, emergency and affordable housing, transportation, outreach, prevention, and supportive services for homeless children,

families, foster youth, veterans, battered women, seniors, disabled individuals, and other homeless adults, consistent with the strategies developed through the Homeless Initiative adopted by the Board, and as otherwise directed by the Board to address the causes and effects of homelessness.”

In February 2016, the Los Angeles County Board of Supervisors approved 47 strategies to combat homelessness. Seventeen of those strategies are to be targeted with Measure H funds, along with four new strategies.

Since adoption of the Plan, the City of Covina has applied for two Measure H grants through the County. The City has been awarded a Priority 1 grant to identify housing and work with discharge planners for 5150 holds in local hospitals, and a Priority 2 grant. The Priority 2 grant is a multi-city grant with the cities of Azusa, Glendora, Duarte, and West Covina. West Covina will be the fiscal agent, and the grant provides for five housing navigators, each housed in one of the cities, to provide services to homeless persons. The Priority 2 grant also requires matching funds by the cities.

Mortgage Credit Certificates – The MCC Program offers qualified first-time homebuyers a federal income tax credit. The federal credit can reduce potential federal income tax liability, creating additional net spendable income for qualified first-time homebuyers to possibly use toward their monthly mortgage payment. This MCC Program enables qualified first-time homebuyers to convert a portion of their annual mortgage interest into a direct dollar for dollar tax credit on their U.S. individual income tax returns. The qualified homebuyer is awarded a tax credit of up to 20% of the annual interest paid on the mortgage loan. The remaining 80% of the mortgage interest will continue to qualify as an itemized tax deduction. Covina is a participating city in the County-run MCC program. As of 2021 the maximum annual income for households with 1-2 persons is \$135,120 while for households of 3 or more persons the income limit is \$157,640.⁴

Home Ownership Program – The Home Ownership Program (HOP) provides no-interest loans to low-income homebuyers who have not owned a home in the last three years. This program is administered by the Los Angeles County Development Authority (CDA). The maximum gross annual income for eligible participants is 80% of the median income for Los Angeles County. The sources of funds were the American Dream Down Payment Initiative and federal HOME funds. The HOP Second Trust Deed program provides up to 20% of the purchase price for down-payment and closing costs assistance up to \$85,000.

Southern California Home Financing Authority Programs – SCHFA is a joint powers authority between Los Angeles and Orange Counties formed in June 1988 to issue tax-exempt mortgage revenue bonds for low- to moderate-income First-Time Homebuyers. This program makes buying a home more affordable for qualifying homebuyers by offering a competitive 30-year fixed rate loan and a grant for down-payment and closing costs assistance. The program is administered by the Los Angeles County Development Authority (CDA) and the Public Finance Division of the County of Orange. SCHFA does not lend money directly to homebuyers. Homebuyers must work directly with a participating lender.

⁴ <https://www.lacdc.org/for-homeowners/homebuyer/mortgage-credit-certificate-program>

As of 2021 the maximum loan amount is \$510,400 and maximum annual income limits for Los Angeles County are \$135,120 for households with 1 or 2 persons and \$157,640 for households of 3 or more.⁵

Non-Profit Organizations – Non-profit organizations play a major role in the development of affordable housing in Los Angeles County. The Los Angeles County Development Authority (CDA) supplements its own efforts of producing affordable housing by entering into partnerships with private sector and non-profit developers and housing development corporations. For example, Jamboree Housing Corporation is the Managing General Partner of the Cienega Gardens affordable apartment project.

C. 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.⁶

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.

The City's website⁷ provides referrals for residents to energy conservation programs including:

- 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.

⁵ <https://www.lacdc.org/for-homeowners/homebuyer/southern-california-home-financing-authority>

⁶ California Energy Commission (<http://www.energy.ca.gov/title24>)

⁷ <https://covinaca.gov/publicworks/page/energy-conservation-rebate-programs>

- HERO Financing Program for Home Retrofits - The Home Energy Retrofit Opportunity (HERO) Financing Program will assist in funding energy efficiency projects for Covina homeowners. Through the HERO program, homeowners will work alongside contractors to identify home energy projects and products that are eligible for low-interest financing. The low interest loans are paid back as an additional line item on the home's property tax. There are no up-front costs.
- Savings by Design - This program is designed for non-residential new construction, renovation, and remodel projects. Savings by Design provides energy-efficient design ideas to primary decision-makers such as building owners, developers, architects, engineers, designers, contractors, and builders. A Savings by Design analysis provides detailed technical and financial assistance data that allows owners and design teams to make informed decisions regarding energy efficiency features. This approach offers the non-residential building industry a multi-faceted program designed to consistently serve the needs of the building community throughout California. Savings by Design encourages energy-efficient building design and construction practices, promoting the efficient use of energy by offering up-front design assistance supported by financial incentives based on project performance.
- PACE Financing Program for Commercial Properties - Upgrading or retrofitting buildings to use less energy and water or produce clean energy can lower operating costs while increasing property value. In an effort to make these energy improvements more attainable for property owners, Renovate America offers the Property Assessed Clean Energy (PACE) financing program. Unlike a traditional loan, PACE financing is paid back via an assessment on the property tax bill. PACE financing allows owners of commercial properties to finance up to 100% of the cost of installing energy-efficient, renewable energy and water-saving improvements and immediately enjoy the benefits of lower utility bills. PACE offers low fixed rates and extended terms of 5 to 20 years to help keep payments affordable.
- Electric Lawn Mower Rebate Program - A rebate is available to residents that purchase a qualifying electric lawn mower. Residents that purchase a new, cordless electric lawn mower and scrap their old gas mower are eligible for a rebate based on the purchase price of the new mower. The on-line application is available at www.aqmd.gov/lawnmower. Rebates range from \$150 to \$250, depending on the purchase price of the new electric lawn mower. Over 20 electric lawn mower models qualify.

V. CONSTRAINTS

This chapter addresses potential constraints that can adversely affect the cost and supply of housing. Such constraints include governmental policies, regulations and standards, as well as non-governmental factors such as the cost of land and availability of financing. Local governments have only limited ability to reduce some of the most difficult constraints, including the cost of labor and materials, general economic conditions and the development decisions of landowners.

A. Governmental Constraints

Land use regulations are among the most important techniques used by local governments to protect public health and safety; however, they also have the potential to increase the cost of housing. Potential governmental constraints include land use controls, building codes and their enforcement, site improvement requirements, fees and other exactions, and local development processing and permit procedures.

Land use controls typically limit the density or intensity of development, potentially increasing the cost per unit. On-site and off-site improvements such as roads, water or wastewater systems flood control facilities, and other infrastructure increase development costs. Since the adoption of Proposition 13 by California voters in 1978, the reduction in local government property tax revenues has resulted in the shifting of a greater share of the cost of public facilities and services to development projects.

1. Land Use Plans and Regulations

General Plan

Each city and county in California must prepare a comprehensive, long-term General Plan to guide its future. The Land Use Element of the General Plan establishes the allowable location, type, density and intensity of uses within the various areas of the city. Under State law, the General Plan elements must be internally consistent and zoning must also be consistent with the General Plan. The Land Use Plan must be correlated with the Housing Element to provide suitable locations and densities for housing to meet the needs of the community.

Covina's Land Use Plan is comprised of nine land use categories, which include three residential, two commercial, and one industrial designations, as well as School, Park, and Open Space. The land use categories allowing residential use are summarized in **Table V-1**.

**Table V-1
Residential Land Use Categories –
Covina General Plan**

Land Use Designation	Density*	Typical Residential Uses
Low Density Residential (LDR)	0 – 6.0	Single-family detached homes, ADUs, group homes
Medium Density Residential (MDR)	6.1 – 14.0	Apartments, condominiums, townhouses, mobile homes, two or more single-family detached houses, single-family detached residence plus apartments, group homes, ADUs
High Density Residential (HDR)	14.1 – 22.0	Apartments, condominiums, townhouses, mobile homes, two or more single-family detached houses, a single-family detached residence and apartments, group homes, ADUs
Town Center Specific Plan (TCSP)	Up to 50	Residential and mixed uses as provided in the TCSP

Source: City of Covina General Plan Land Use Element, 2019.

* Density expressed in dwelling units per net acre.

Zoning Regulations

The City regulates the type, location, density, and scale of residential development through the Zoning Ordinance and Zoning Map. Zoning regulations serve to implement the General Plan. The Zoning Ordinance establishes zoning districts and residential development standards for each district. A summary of the development standards for the zoning districts permitting residential development is provided in **Table V-2**.

The Zoning Ordinance also describes the types of land uses that are allowed in each zone. A summary of the types of housing permitted in each zoning district is provided in **Table V-3**. The Zoning Ordinance provides for a variety of housing types including single-family homes (both attached and detached), multi-family (both rental and condominiums), manufactured housing, special needs housing, group homes and accessory units.

Specific Plans

Town Center Specific Plan

The Covina Town Center Specific Plan (TCSP) establishes land use, transportation, infrastructure, economic development, and urban design strategies to revitalize the City core and streamline the development process while building upon the Metrolink's Covina Station assets. The Specific Plan outlines land use and mobility opportunities within the Town Center, as well as new building standards and guidelines. The TOD/HDR designation allows a density up to 50 units/acre within one-half mile of the Metrolink station and 40 units/acre elsewhere. The Plan seeks to create a memorable, accessible, and economically vibrant Town Center. The Specific Plan implements the Town Center Vision, outlines development standards and design guidelines to support the vision, and identifies action steps to achieve key objectives. The Specific Plan provides the necessary framework to guide future public and private investment in the Town Center over an approximately 20-year planning horizon.

**Table V-2
Residential Zoning Districts and Development Standards**

Zoning District	Min. Lot Area	Allowable Density	Yard Setback Front/Side/Rear	Lot Width	Lot Depth	Height Limit	Max. Lot Coverage	
A-1	2 acres	1du/acre	25' 20' 25'	300'	300'	35'	35%	
A-2	2 acres	1du/acre	25' 20' 25'	300'	300'	35'	35%	
E- ½	½ acre	2du/ acre	40' 15' 25'	100'	150'	35'	35%	
E-1	1 acre	2du/ acre	60' 30' 30'	100'	150'	35'	35%	
E-2 ½	2 ½ acres	1du/2.5 acres	60' 30' 30'	100'	150'	35'	35%	
E-5	5 acres	1du/5 acres	60' 30' 30'	100'	150'	35'	35%	
R-1- 20,000	20,000 sq. ft.	1du/20,000 sq. ft.	25' 10' 25'	100'	150'	35'	35%	
R-1 -10,000	10,000 sq. ft.	1du/10,000 sq. ft.	25' 5' 25'	80'	110'	35'	35%	
R-1- 8,500	8,500 sq. ft.	1du/8,500 sq. ft.	25' 5' 25'	70'	105'	35'	35%	
R-1- 7,500	7,500 sq. ft.	1du/7,500 sq. ft.	25' 5' 25'	60'	100'	35'	35%	
RD	7,200 sq. ft.	RD-number suffix	25' 5' 25'	60'	120'	35'	35-40%	
R-TR	All existing mobile home parks have been granted CUPs, which establish development standards.							

Source: City of Covina, 2019.

* Density expressed in dwelling units per net acre.

**Table V-3
Allowable Residential Uses by Zoning District**

Use	Zoning District											
	A-1	A-2	E-1/2	E-1	E-2-1/2	E-5	R-1 20,000	R-1 10,000	R-1 8,500	R-1 7,500	RD	R-TP
Single-Family	P	P	P	P	P	P	P	P	P	P	P	P
Multi-Family	X	X	X	X	X	X	X	X	X	X	P	P
Residential Care (<= 6)	P	P	P	P	P	P	P	P	P	P	P	P
Residential Care >6	X	X	X	X	X	X	X	X	X	X	C	X
Emergency Shelter ¹	X	X	X	X	X	X	X	X	X	X	X	X
Low Barrier Navigation Center ¹	X	X	X	X	X	X	X	X	X	X	X	X
Transitional Housing	2	2	2	2	2	2	2	2	2	2	2	2
Supportive Housing	2	2	2	2	2	2	2	2	2	2	2	2
SRO/Boarding House ²	X	X	X	X	X	X	X	X	X	X	P	X
Manufactured Housing	P	P	P	P	P	P	P	P	P	P	P	P
Residential Trailers ³	X	X	X	X	X	X	X	X	X	X	X	P
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P	P	P	P

P = Permitted C = Conditionally Permitted X = Prohibited

Notes:

1. Emergency shelters and low barrier navigation centers are not currently addressed in the Zoning Ordinance (see Chapter V, Program 4.2)

2. Transitional and supportive housing are not currently addressed in the Zoning Ordinance, therefore standards default to State law (see Chapter V, Program 4.2)

3. See Municipal Code Sec. 17.04.594 (<https://www.codepublishing.com/CA/Covina/#!/Covina17/Covina1704.html#17.04.594>)

Source: City of Covina, 2020

In general, the development activity is stimulated and influenced by a range of tools, including:

- Development standards, design guidelines, and other regulatory tools and metrics
- Public infrastructure improvements
- A comprehensive and strategic set of policy, physical, and programmatic implementation actions
- TOD/HDR allow density to increase up to 50 units per acre within half a mile of Transit station (Covina Metrolink)
- Certification of an EIR for the Specific Plan, which provides CEQA documentation for new development within the Specific Plan area, thereby streamlining the permit review process.

Development standards in the TCSP are summarized in **Table V-4**. Residential densities in the TCSP are determined by land use designation and parcel size. Allowable densities for stand-alone residential development range up to 40 units per acre while densities up to 50 units per acre are permitted for mixed-use projects. Allowable residential uses within the TCSP are shown in **Table V-5**.

Table V-4
Residential Development Standards – Town Center Specific Plan

District	Allowable Density (units/acre)	Height Limit	FAR Limit
Residential-Town Center West	14-22	4 stories/ 50 ft	na
Residential-Town Center East	14-22	4 stories/ 50 ft	na
Neighborhood	14-22	3 stories/ 35 ft	0.35
Transit Oriented Development/High Density Residential	26-40 ¹ 26-50 ²	4 stories/ 50 ft	1.0 (stand-alone residential) 1.25 (mixed use)
Mixed Use	23-31 ¹ 26-40 ²	4 stories/ 50 ft	1.0 (stand-alone residential) 1.25 (mixed use)
Food/Arts/Industrial/Residential	15-25 ¹ 1-25 ²	4 stories/ 50 ft	2.0 (mixed use)
Historic Core	15-30 ¹ 26-40 ²	4 stories/ 50 ft	2.0 (stand-alone residential) 2.5 (mixed use)
Civic	31-40	4 stories/ 50 ft	0.75 (stand-alone residential) 1.0 (mixed use)
Cultural Core	15-30 ¹	4 stories/ 50 ft	-

Notes:

1. Stand-alone residential

2. Mixed use

Source: City of Covina, Town Center Specific Plan, 2020

Covina Forward Specific Plan

The approximately 10.7-acre Covina Forward Specific Plan (CFSP) is located northeast of the intersection of Citrus Avenue and Covina Boulevard. The CFSP is intended for development of a transit-oriented mixed-use development with a civic/community use component. Planning Area 1 includes a single-family attached residential component with 120 units at a maximum density of 22 units per acre with parking, an accessory common area, recreation facilities and other amenities. The intent of the CFSP is to provide for the orderly redevelopment of a vacant, prominent disused commercial property in a manner that addresses the community's needs for transit-oriented residential development, regional transportation facilities and civic/ community facilities.

**Table V-5
Allowable Residential Uses – Town Center Specific Plan Districts**

Use	RTC-W	RTC-E	N	T/H	MU	F	HC	C	CC
Single-Family/Duplex	P	P	P	X	X	X	X	X	X
Multi-Family	P	P	X	P	P	P	P	X	P
Co-Living	X	X	X	X	X	P	X	X	X
Live/Work	X	X	P	X	P	P	P	X	X
Residential Care (<= 6)	P	P	P	P	P	P	P	X	P
Emergency Shelter ¹	X	X	X	X	X	X	X	X	X
Transitional Housing	2	2	2	2	2	2	2	2	2
Supportive Housing	2	2	2	2	2	2	2	2	2
Single Room Occupancy	X	X	X	X	C	P	C	X	X
Accessory Dwelling Unit	P	P	P	P	P	P	P	X	P
Mixed Use	X	X	X	P	P	P	P	P	X

P = Permitted C = Conditionally Permitted X = Prohibited

Notes:

1. Emergency shelters are not currently addressed in the Zoning Ordinance (see Chapter V, Program 4.2)

2. Transitional and supportive housing are not currently addressed in the Zoning Ordinance, therefore standards default to State law (see Chapter V, Program 4.2)

Source: City of Covina, Town Center Specific Plan, Table 3-2, 2020

Effect of Zoning and Development Standards on Housing Supply and Affordability

Zoning regulations and development standards can affect the feasibility of development projects, particularly housing that is affordable to lower- and moderate-income households. The most significant of these standards is density. Higher densities generally result in lower per-unit land costs, thereby reducing overall development cost, although this is not always the case. For example, higher densities may require more expensive construction methods such as parking in structures or below-grade garages.

Pursuant to State law⁸ the “default density” for Covina is 30 dwelling units per acre. Default density refers to the density at which lower-income housing development is presumed to be feasible, although State law allows jurisdictions to propose alternative densities that are sufficient to facilitate affordable housing based on local conditions. Although appropriate zoning regulations are necessary for affordable housing to be feasible, it should be recognized that large public subsidies are also necessary to reduce costs to the level that lower-income households can afford, particularly in high-cost areas of Southern California.

The Town Center Specific Plan allows multi-family residential or mixed-use development at densities of 30 units/acre or more in the Transit Oriented Development/High Density Residential, Mixed-Use, Civic, Historic Core, and Cultural Core districts and is the most likely area of the city where new affordable housing development could occur. To ensure that TCSP development standards are effective in facilitating additional housing development, Program 4.6 includes a commitment to conduct a review TCSP regulations and if any standards are found to unreasonably restrict residential development, a TCSP amendment will be processed.

Accessory Dwelling Units

ADUs serve to augment resources for senior housing, caregivers, household employees, and other low- and moderate-income segments of the population. In recent years the State Legislature has adopted extensive revisions to ADU law, and the City's ADU regulations (Municipal Code Chapter 17.69) were most recently updated in 2020 to incorporate State law in effect at that time. The Municipal Code includes a provision that in the event of a conflict between State ADU laws and the City ordinance, State law shall prevail. Program 2.3 in Chapter V includes a commitment to monitor future changes in ADU law annually and update City regulations as necessary to ensure consistency with State requirements.

Special Needs Housing

Persons with special needs include those with disabilities, the elderly, homeless persons needing emergency shelter, transitional or supportive housing, single room occupancy units, persons living in residential care facilities, and farmworkers. The City's provisions for these housing types are described below.

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*.

⁸ Memo of June 20, 2012 from the California Department of Housing and Community Development regarding default densities.

Compliance with building codes and the Americans with Disabilities Act (ADA) may increase the cost of housing production and can also impact the viability of rehabilitation of older properties required to be brought up to current code standards. However, these regulations provide minimum standards necessary to ensure the availability of safe and accessible housing.

Municipal Code §17.33.050 establishes procedures for reviewing and approving requests for reasonable accommodation for persons with disabilities consistent with current law.

Housing for the Elderly

Senior housing developments are permitted in all residential zoning districts. A density bonus is also permitted for the construction of senior housing pursuant to *Government Code* §§65915-65918. The Zoning Ordinance is not considered to be a constraint to the development of senior housing because the regulations are the same as for other residential uses of the same type in the same zoning districts.

Emergency Shelters, Low Barrier Navigation Centers and Transitional/Supportive Housing

Emergency shelters. Emergency shelters are facilities that provide a safe alternative to the streets either in a shelter facility, or through the use of motel vouchers. Emergency shelter is short-term and usually for 30 days or less. State law requires jurisdictions to evaluate their need for shelters compared to available facilities to address the need. If existing shelter facilities are not sufficient to accommodate the need, jurisdictions must designate at least one zone where year-round shelters can be accommodated by-right subject to specified development standards. As noted in Chapter III – Housing Needs Assessment, the most recent homeless survey conducted by the Los Angeles Homeless Services Authority estimated that there were 91 homeless persons in Covina. Municipal Code §17.33.030 establishes the Emergency Shelter Overlay District where emergency shelters with up to 100 beds are allowed by-right. Development standards include a minimum separation of 300 feet between emergency shelters and one parking space per four beds, plus one space for each staff member on duty. The overlay zone is approximately 4.9 acres in size, is owned by the City and is currently used for equipment and materials storage. This site has potential capacity for a 100-bed shelter and is located in close proximity to public transit and services needed by homeless persons.

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. Municipal Code §17.33.040 establishes the following regulations for low barrier navigation centers consistent with current law.

1. It offers services to connect people to permanent housing through a services plan that identifies services staffing.

2. It is linked to a coordinated entry system, so that staff in the interim facility or staff who co-locate in the facility may conduct assessments and provide services to connect people to permanent housing. "Coordinated entry system" means a centralized or coordinated assessment system developed pursuant to Section 576.400(d) or Section 578.7(a)(8), as applicable, of Title 24 of the Code of Federal Regulations, as those sections read on January 1, 2020, and any related requirements, designed to coordinate program participant intake, assessment, and referrals.

3. It complies with Chapter 6.5 (commencing with Section 8255) of Division 8 of the Welfare and Institutions Code.

4. It has a system for entering information regarding client stays, client demographics, client income, and exit destination through the local Homeless Management Information System as defined by Section 578.3 of Title 24 of the Code of Federal Regulations.

5. Low barrier navigation centers shall also comply with the standards established for emergency shelters in CMC §17.33.030.

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

State law also requires that transitional and supportive housing be regulated as a residential use that is subject only to the same requirements and procedures as other residential uses of the same type in the same zone. AB 2162 of 2018 (Government Code Section 65583(c)(3)) further requires that supportive housing development projects meeting specific criteria must be allowed by-right in all zones allowing multi-family development, including mixed-use and nonresidential zones. Municipal Code Chapter 17.04 establishes regulations for transitional housing and supportive housing consistent with current law.

Single Room Occupancy

Single room occupancy facilities are small studio-type units and are a permitted use (called *boarding houses*) in the RD (Multi-Family) zoning district. SROs are also a permitted use in the FAIR district of the TCSP and a conditional use in the Mixed Use and Historic Core districts. The City approved SROs at the Moreno (previously Smith) Senior Housing units, which are under an affordability covenant.

Residential Care Facilities

Residential care facilities refer to any family home, group home, or rehabilitation facility that provides non-medical care to persons in need of personal services, protection, supervision, assistance, guidance, or training essential for daily living. In accordance with State law, residential care homes that serve six or fewer persons are permitted according to the same standards as apply to residential uses. Residential care facilities for seven or more persons are conditionally permitted in the RD Multiple-Family Residential Zone.

Definition of Family

The Zoning Ordinance defines *family* as “an individual or two or more persons living together as a single housekeeping unit in a dwelling unit.” *Single housekeeping unit* means “a traditional family or the functional equivalent of a traditional family, whose members are a nontransient interactive group of one or more persons, where if consisting of more than one person, such persons jointly occupy a single dwelling unit, jointly use common areas, share household activities and responsibilities (e.g., meals, chores, and expenses), and where, if the unit is rented, leased, or subleased, all adult members living on the premises jointly agree to occupy and be responsible for the entire premises of the dwelling unit under a single written rental agreement or lease and the makeup of the household occupying the unit is determined by the residents of the unit rather than the landlord or property manager.” These definitions are consistent with fair housing law.

Farm Worker Housing

As discussed in **Chapter III. Housing Needs Assessment**, since the City of Covina is not near major agricultural areas there is not a significant need for permanent farm worker housing. The City's overall efforts to provide and maintain affordable housing opportunities will help to support the limited number of seasonal farm workers that may reside in Covina. However, commercial agriculture is a permitted use in the A-1 and A-2 zones; therefore, pursuant to the Employee Housing Act (Government Code 17021.5 and 17021.6) qualifying employee housing with up to 12 units or 36 beds is allowed as an agricultural use in these zones. In addition, employee housing for up to six persons is deemed a single-family use.

Off-Street Parking Requirements

The City's parking requirements for residential uses are summarized in **Table V-6** (outside the Town Center Specific Plan area) and **Table V-7** (within the Town Center Specific Plan).

**Table V-6
Residential Parking Requirements: Outside TCSP**

Type of Unit	Required Off-Street Parking*
Single-Family Detached	2-car garage
Duplex	2-car garage for each unit
Trailer Parks	1 for each trailer space plus 1 for each 10 spaces separate from the trailer spaces
Accessory Residential Units	1 for each unit, unless an exception applies pursuant to California Government Code §65852.2(d), or successor statute
Multi-Family Dwellings, Condominiums, and Other Attached Dwellings**	
Bachelor	1 covered space
1 bedroom	1 covered space
2 bedrooms	2 covered spaces
3 or more bedrooms	2 covered spaces plus one-half space for each bedroom in excess of 3
Rooming Houses	1 for each sleeping room or 1 for each 2 beds, whichever is greater

*Reduced parking is allowed for projects that provide affordable housing pursuant to state Density Bonus law.

** In addition, guest parking shall be provided at a ratio of 1 space for each 5 units.

Source: Covina Zoning Ordinance Chapter 17.72

**Table V-7
Residential Parking Requirements: TCSP**

Type of Unit	Required Off-Street Parking*
Stand-alone residential	
Single-family (attached or detached)	2 covered spaces per unit
Multi-family	SRO/Studio/1-Bedroom: 1 space per unit plus 1 guest space per each 4 units 2- to 4-Bedroom: 2 spaces per unit plus 1 guest space per each 4 units
Mixed-use	
SRO/Studio/1-Bedroom	1 space per unit plus 1 guest space per each 4 units
2- to 4-Bedroom	2 spaces per unit plus 1 guest space per each 4 units
Live/work	Up to 2-bedrooms: 1 space per unit plus 1 guest space per each 4 units 2+ bedroom unit: 1 space per unit plus 1 guest space per unit

*Reduced parking is allowed for projects that provide affordable housing pursuant to state Density Bonus law.

Source: City of Covina, Town Center Specific Plan

As shown in these tables, off-street parking standards within the Town Center Specific Plan area are significantly lower than elsewhere in the city due to the availability of high-quality transit, including the Covina Metrolink Station and bus service.

In addition to the lower parking requirements, the TCSP allows reductions to off-street parking based upon a parking demand study, and residential guest parking requirements in mixed-use projects may be satisfied through shared parking with commercial uses.

Available transit reduces the need for residents in the TCSP area to rely on private automobiles for travel. The majority of new residential development in Covina is expected to occur in the TCSP area, and lower off-street parking requirements help to reduce the

cost of housing and also reduce vehicle miles traveled (VMT) and greenhouse gas emissions consistent with State and regional planning objectives.

These parking standards do not act as a significant constraint on the cost and supply of housing.

Density Bonus

Under Government Code Section 65915-65918, a density increase over the otherwise maximum allowable residential density plus other incentives are available to developers who agree to construct housing developments with units affordable to low- or moderate-income households or senior housing. Municipal Code § 17.33.020 establishes density bonus regulations consistent with current State law.

Mobile Homes/Manufactured Housing

There is often an economy of scale in manufacturing homes in a factory rather than on site, thereby reducing cost. State law precludes local governments from prohibiting the installation of mobile or manufactured homes on permanent foundations on single-family lots. The Municipal Code allows manufactured housing in all residential zones provided the installation complies with the site development standards for the applicable zoning district. Mobile home parks and residential trailers are a permitted use within the R-TP (Trailer and Mobile Home Park) district. There are five mobile home parks in Covina.

Inclusionary Housing

Inclusionary housing refers to local requirements for the provision of affordable units as part of residential developments. No inclusionary requirements have been adopted in Covina.

Short-Term Rentals

No regulations have been adopted to prohibit or restrict short-term rental of residential units.

Building Codes

State law prohibits the imposition of building standards that are not necessitated by local geographic, climatic or topographic conditions and requires that local governments making changes or modifications in building standards must report such changes to the Department of Housing and Community Development and file an expressed finding that the change is needed.

The City has adopted the most recent California Building Standards Codes (California Code of Regulations, Title 24), which are intended to protect the public health, safety and welfare. No additional regulations have been imposed by the City that would unnecessarily add to housing costs.

New developments are reviewed through a plan check process to ensure compliance with building codes, and building inspectors monitor construction to confirm that it conforms to the approved plans.

2. Development Processing Procedures

State Planning and Zoning Law establishes the legal framework for the review and approval of land uses and development. The Zoning and Subdivision Ordinances (Titles 16 and 17 of the Municipal Code) guide the City's development review process to minimize the time required to obtain permits while ensuring that developments comply with applicable regulations.

Review Process for Residential Development

Review processes are characterized as either *ministerial* or *discretionary*. A ministerial review process, also referred to as development *by-right*, is limited to determining whether an application complies with objective standards and does not involve subjective judgment on the part of the decision-maker. Ministerial approvals are exempt from CEQA. Discretionary decisions involve some exercise of judgment on the part of the decision-maker and are subject to CEQA review.

Site Plan Review

Overview. Site plan review pursuant to Chapter 17.64 is required in all zoning districts prior to the construction, remodeling or expansion of any building, except for minor work such as additions to single-family residential structures of less than 500 square feet or 900 square feet in any three-year period; or minor alterations and remodeling of multiple-family buildings that do not increase the floor area.

Pre-application conference. A conference with the applicant is required prior to submission of a site plan review application. The purpose of this conference is to acquaint the applicant with applicable standards in order to avoid delays.

Application. The application package requires a site plan, building elevations and floor plans, and a building materials and color board showing samples of roof, exterior wall and trim materials and colors for the proposed building unless determined to be unnecessary by the Community Development Director.

Review and approval. Most site plan reviews for residential projects are approved administratively by the Director without a public hearing. The Planning Commission considers site plan review applications at a public hearing if the project involves more than 500 square feet of additional floor area and is located in a commercial, industrial or multiple-family residential zone district located adjacent to or across any street, railroad, public right-of-way, drainage channel or easement from an agricultural, estate or single-family residential zone district.

Some recent residential projects have been proposed at densities lower than the maximum allowed, and some projects have proposed densities lower than the minimum

allowed under the zoning standards when lower densities are better suited to market conditions. While higher densities can result in lower per-unit housing costs, this is not always the case. For example, a recent real estate market study in San Diego County examined the relative financial feasibility of three hypothetical multi-family developments at densities of 20, 24 and 30 units per acre and found that a density range of 20 to 24 units/acre was the most financially feasible for affordable housing. It is recognized that development feasibility is affected by a variety of factors and different economic conditions may exist in other locations. However, it must be recognized that higher density does not necessarily result in improvements to financial feasibility and affordability.

Findings for Approval. Findings required for approval of a site plan include:

- Compliance with the General Plan, Zoning Ordinance, applicable design guidelines, transportation demand management regulations, utility and street improvement requirements, and any applicable specific plans or guidelines
- The project is designed so that traffic congestion is avoided, pedestrian and vehicular safety and welfare are protected, and there will be no adverse effect on surrounding property
- The project design is harmonious, consistent and complete within itself and functionally and visually compatible with neighboring structures and the area in which it is located
- The development will constitute an adequate environment for the intended use by sustaining the desirability and stability of the neighborhood and community
- Lighting is arranged to reflect light away from adjoining properties
- Signs will not interfere with traffic or limit visibility

To ensure that development review procedures do not unreasonably hinder housing development, Program 4.3 includes a commitment to reevaluate Site Plan Review procedures and criteria, and amend the requirements if they are found to unreasonably impact the cost and supply of housing.

Conditional Use Permits

Overview. As shown previously in **Table V-3**, the only type of residential use in conventional residential zoning districts requiring a conditional use permit is large residential care facilities serving seven or more residents. In the Town Center Specific Plan, SROs are subject to a CUP in the Mixed Use and Historic Core districts (TCSP Table 3-2).

CUP requirements are established in Sec. 17.62.120 of the Zoning Ordinance. The Planning Commission must make the following findings for CUP approval.

A. That the site for the proposed use is adequate in size and shape to accommodate the use and all yards, spaces, walls and fences, parking, loading, landscaping and other features required by this title to adjust the use with land and uses in the neighborhood;

B. That the site for the proposed use relates to streets and highways adequate in width and pavement type to carry the quantity and kind of traffic generated by the proposed use;

C. That the proposed use will have no adverse effect on abutting property or the permitted use thereof;

D. That the conditions stated in the decision are deemed necessary to protect the public health, safety and general welfare. Such conditions may include:

- 1. Regulation of use,*
- 2. Special yards, spaces and buffers,*
- 3. Fences and walls,*
- 4. Surfacing of parking areas subject to city specifications,*
- 5. Requiring street, service road or alley dedications and improvements or appropriate bonds,*
- 6. Regulation of points of vehicular ingress and egress,*
- 7. Regulation of signs,*
- 8. Requiring landscaping and maintenance thereof,*
- 9. Requiring maintenance of the grounds,*
- 10. Regulation of noise, vibration, odors, etc.,*
- 11. Regulation of time for certain activities,*
- 12. Time period within which the proposed use shall be developed,*
- 13. Duration of use,*
- 14. And such other conditions as will make possible the development of the city in an orderly and efficient manner and conformity with the intent and purposes set forth in this title.*

The CUP process is only applicable in limited situations and does not pose an unusual constraint to those types of housing.

Legislative Land Use Approvals

Under State law, approvals such as General Plan and Zoning Code amendments, Specific Plans and Development Agreements are considered legislative actions that by law must be reviewed and approved by the City Council. In addition to State requirements, zoning amendments are subject to the provisions of Chapter 17.80 of the Zoning Ordinance. Such actions also typically require CEQA review, which can require a substantial amount of time. Cities have limited control over the time required for these types of actions.

Permit Processing Time

Permit processing times depend on the nature and complexity of the project. When a project involves two or more separate approvals, such as a zone change and site plan review, the applications are processed concurrently in order to minimize the overall time required.

Projects that are reviewed and approved by the Director, such as site plan reviews and administrative CUPs, typically require four to eight weeks to process. More complex projects such as subdivision maps and zone changes, which are subject to City Council approval, typically require at least five months to process and are affected by the time required for CEQA compliance. Projects involving an EIR may require a year or more to complete. **Table V-8** identifies the review authority for land use permits and other entitlements, as well as the typical processing time for each type of application.

Table V-8
Review Authority and Typical Processing Time for Residential Development

Type of Permit or Decision	Est. Processing Time	Director	Planning Commission	City Council
Site Plan Review (Administrative)	4-8 weeks	Decision	Appeal	Appeal
Site Plan Review (Planning Commission)	10-12 weeks		Decision	Appeal
Administrative Conditional Use Permit	4-8 weeks	Decision	Appeal	Appeal
Conditional Use Permit	12+ weeks		Decision	Appeal
Minor Variance	4 weeks	Decision	Appeal	Appeal
Variance	12+ weeks		Decision	Appeal
General Plan Amendment	20+ weeks		Recommend	Decision
Specific Plan or Amendment	20+ weeks		Recommend	Decision
Zoning Map or Code Amendment	20+ weeks		Recommend	Decision
Tentative Map	52+ weeks		Recommend	Decision

Source: City of Covina, 2019

These procedures and timelines are typical of most jurisdictions in the San Gabriel Valley and do not act as a substantial constraint to housing development.

One of the City's purposes in preparing the Town Center Specific Plan was to simplify and expedite the development process through the preparation of a Program EIR for the TCSP. Using the streamlined review provisions of the California Environmental Quality Act (CEQA), development projects that are consistent with the TCSP can avoid the expensive and time-consuming process of site-specific CEQA review.

In addition, the City has adopted traffic analysis standards to implement SB 743 related to the use of vehicle miles traveled (VMT) rather than level of service (LOS) for purposes of CEQA analysis of transportation impacts. These new standards simplify the CEQA review process and help to reduce residential development processing time and cost.

Streamlined Review

Under some circumstances development applications may be eligible for “streamlined ministerial review” such as pursuant to SB 35 (Government Code Sec. 65913.4). Qualifying projects are subject to specified procedures and development standards intended to simplify and expedite the development process. The City is currently preparing guidelines to assist applicants and City staff in complying with these requirements (see Chapter VI, Program 2.4).

3. Development Fees and Improvement Requirements

After the passage of Proposition 13 and its limitation on local government property tax revenues, cities and counties have faced increasing difficulty in providing adequate public services and facilities to serve their residents. One of the main consequences of Proposition 13 has been a shift in funding of new infrastructure from general tax revenues to development impact fees and exactions. The City requires developers to provide on-site and off-site improvements necessary to serve their projects. Such improvements may include water, sewer and other utility extensions, street construction and traffic control device installation that are reasonably related to the project. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities and school sites, consistent with the Subdivision Map Act.

Development Fees

State law limits fees charged for development permit processing to the reasonable cost of providing the service for which the fee is charged. Various fees and assessments are charged by the City and other public agencies to cover the costs of processing permit applications and providing services and facilities such as schools, parks and infrastructure. **Table V-9** summarizes fees the City of Covina currently charges for new residential development. The City periodically evaluates the actual cost of processing development permits when revising its fee schedule. The last fee schedule update was adopted in 2016.

**Table V-9
Planning and Development Fees**

Fee Category	Fee or Deposit Amount^a	
Planning and Permit Fees		
Site Plan Review (major)	\$5,417	
Site Plan Review (minor)	\$105 - \$3,168	
General Plan Amendment	\$10,830	
Zoning Amendment	\$4,736 - \$10,830	
Conditional Use Permit	\$4,134	
Tentative Parcel Map	\$3,769	
Tentative Tract Map	\$10,830	
Variance	\$1,236 - \$4,134	
General Plan fee	\$2.00 per \$1,000 construction valuation	
CEQA Compliance		
Environmental Analysis	\$4,118 + consultant cost	
Development Impact Fees		
	SF	MF
General Government	\$1,028	\$974
Library	\$646	\$498
Police	\$956	\$737
Parks	\$6,172	\$4,759
Circulation	\$2,334	\$1,867
Schools	\$2.26/sf	\$3.19/sf
Fire protection	\$458	\$353
Estimated total impact fees per unit*	\$17,018	\$12,836
Estimated typical development cost	\$800,000	\$500,000
Estimated % of total development cost	2%	3%

*Assumes typical 2,400 sf (SF) and 1,200 sf (MF)

Source: City of Covina, 2019

Communities Facilities District fees. In 2007 the City established a Mello-Roos Community Facilities District (CFD) to offset the increased cost of public services needed to serve new residential developments. The CFD special taxes are used to defray the additional cost of police, fire protection and suppression, paramedic services and park maintenance.

Only residential developments where there is a net increase of residential units are subject to special taxes. Replacement, reconstruction, improvement or expansion of pre-existing residential units where no new dwelling units are created (such as room additions, replacement or reconstruction after fire, earthquake or disaster, home improvements or refurbishments, etc.) are exempt from CFD taxes. Deed-restricted affordable housing is also exempt.

The CFD collection is done through an annexation process that places a special tax on the new property owner's tax bill. The annexation process, which includes a public hearing and a special election (a landowner vote if there are less than 12 registered voters within the territory proposed to be annexed), must be completed prior to issuance of a building permit. The developer is responsible for the cost incurred by the City to process the annexation of the development to the District (currently approximately \$3,500). As of 2021, annual CFD taxes are \$734.56 for single-family units and \$550.58 for multi-family or mixed-use residential units.

Unfunded State Mandates. In addition to the cost of public improvements, the State Legislature has adopted many “unfunded mandates” that place financial burdens on local governments. For example, beginning in 2018 annual General Plan reporting requirements were expanded significantly but no State funding was allocated to help defray the cost of carrying out this expanded requirement because local governments have the ability to charge fees to offset the administrative cost of complying with these mandates. These State mandates have the effect of increasing the cost of development, such as through increased building permit fees related to administration of the General Plan.

Improvement Requirements

Under the Subdivision Map Act, developers are generally required to construct on- and off-site improvements needed to serve new developments, including streets, sidewalks, and utilities. The City’s street standards are shown in **Table V-10**. These standards are typical for cities in the San Gabriel Valley and do not act as a constraint to housing development.

The City’s Capital Improvement Program (CIP) contains a schedule of public improvements including streets, storm drains and other infrastructure projects to facilitate development consistent with the City’s General Plan. The CIP helps to ensure that public improvements are coordinated with private development. Pursuant to SB 1087 of 2004, water and sewer providers must grant priority for service allocations to proposed developments that include housing units affordable to lower-income households.

Table V-10
Street Standards

Designation	Number of Lanes	Right-of-Way Width
Primary arterial	4-6	100
Secondary arterial	4	80
Collector street	2-4	55-80
Local street	2	52-56

Source: City of Covina, Circulation Element, 2000

Although development fees and improvement requirements increase the cost of housing, cities have little choice in establishing such requirements due to the limitations on property taxes and other revenue sources needed to fund public services and improvements.

B. Non-Governmental Constraints

1. Land Costs

Land represents one of the most significant components of the cost of new housing, and land prices reflect the cyclical nature of the residential real estate market. Covina is a mature city with few vacant parcels remaining; therefore, a substantial portion of new

development opportunities will involve reuse of underutilized sites, which increases development costs due to site clearance activities before development can occur.

2. Construction Costs

Construction cost is affected by the price of materials, labor, development standards and general market conditions. The City has no influence over materials and labor costs, and the building codes and development standards in Covina are not substantially different than other cities in Los Angeles County. In recent years, construction costs for materials and labor have increased at a higher pace than the general rate of inflation according to the Construction Industry Research Board. Current residential construction cost is typically in the range of \$150-200 per square foot, although custom homes and more complex projects can significantly exceed this amount.

3. Cost and Availability of Financing

The crisis in the mortgage industry that began in 2008 affected the availability and cost of real estate loans. One of the most significant changes was a tightening of mortgage underwriting standards, which had greater impacts on lower-income families than other segments of the community. For those with good credit ratings interest rates have been at historic lows, resulting in increased affordability.

Covina is similar to most other communities with regard to private sector home financing programs. As discussed in the previous chapter, a variety of mortgage assistance programs are available that provide a lower interest rate to eligible homebuyers than conventional financing.

Under State law, it is illegal for real estate lending institutions to discriminate against entire neighborhoods in lending practices because of the physical or economic conditions in the area ("redlining"). In monitoring new construction sales, resales of existing homes, and permits for remodeling, it does not appear that redlining is practiced in any area of the city.

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VI. HOUSING ACTION PLAN

The previous chapters of this Housing Element describe the housing needs, opportunities and constraints in Covina. The following Housing Action Plan presents the City's Housing Plan for the 2021-2029 period and establishes goals, policies, programs and quantified objectives intended to address the city's housing needs.

A. Goals and Policies

The goals and policies of the Housing Element presented in the following section address Covina's identified housing needs and are implemented through the programs described in Section B, below.

GOAL ***An adequate supply of housing of all types that serves the needs of current and future Covina residents of all ages, household sizes, types, incomes and ability levels, free from discrimination.***

Policy 1 *Conserve and improve the condition of the existing affordable housing stock.*

Policy 2 *Facilitate housing production commensurate with projected needs for households of all types and income levels.*

Policy 3 *Encourage home ownership for first-time buyers and low- and moderate-income households.*

Policy 4 *Mitigate potential constraints to housing for households of all economic levels and persons with disabilities.*

Policy 5 *Affirmatively further fair housing and equal housing opportunities for all persons.*

B. Housing Programs

The following programs describe the specific actions the City will undertake in support of the goals and policies stated above.

1. *Conserve and improve the condition of the existing affordable housing stock*

1.1 Code Compliance

The City implements a code compliance program to ensure the safety and aesthetic appearance of the community. Staff addresses the unpermitted construction and alterations to residential and non-residential properties whenever noted; identifies and monitors vacant and/or foreclosed properties in an effort to keep them properly maintain and secure from trespassing and intrusion; assists the City's Police Department in

addressing problem properties or problem uses, and works with City Attorney when necessary for compliance. When assistance with problems in the interior of structures are identified, staff works with the Los Angeles County Public Health Department, and on occasion, the Department of Mental Health.

When conditions requiring maintenance or rehabilitation are observed, inspectors refer residents to programs offering funding assistance such as the Covina CDBG Residential Rehabilitation program, programs offered through local churches, and through Habitat for Humanity.

Program objectives and timeframe:

- Continue to implement the code compliance program and direct eligible households to available rehabilitation assistance to address code violations throughout the planning period.

Responsible parties:

- Community Development Department

Funding source:

- CDBG

1.2 Residential Rehabilitation Program

Although the majority of the City's housing stock is in good condition, about two-thirds of housing units in Covina are 50+ years old and require ongoing maintenance and repair. The Residential Rehabilitation Program funds residential repair and improvements for low- to moderate-income (not to exceed 80% of median income adjusted for household size) owner-occupied single-family detached homes and mobile homes. This program is funded through CDBG.

Program objectives and timeframe:

- Facilitate minor repair and rehabilitation assistance for 2 to 4 units annually.

Responsible parties:

- Community Development Department

Funding source:

- CDBG

1.3 Section 8 Rental Assistance

The Section 8 Rental Assistance Program extends rental subsidies to extremely-low- and very-low-income households who spend more than 30% of their gross income on housing. Rental assistance not only addresses housing affordability, but also overcrowding by assisting families that may be "doubling up" to afford rent. The Los Angeles County Housing

Authority coordinates Section 8 rental assistance on behalf of the City. New applications are accepted as funding becomes available.

Program objectives and timeframe:

- Continue to direct eligible households to the County Housing Authority's Section 8 program throughout the planning period.

Responsible parties:

- Los Angeles County Housing Authority

Funding source:

- HUD

1.4 Preservation of Assisted Housing

As discussed in Section II, there are two assisted housing projects eligible to convert to market rate during the 2021-2031 period. The City will continue to monitor assisted units throughout the planning period and encourage their preservation to the extent feasible.

Program objectives and timeframe:

- Preserve 100% of the assisted affordable units in the city.

Responsible parties:

- Community Development Department

Funding source:

- Grant funds

1.5 Mobile Home Park Preservation

There are five mobile home parks in Covina, three of which are designated *Trailers and Mobile Home Parks* in the Zoning Code. This zoning designation helps to preserve these parks since any land use change would require an amendment to the City's Zoning Ordinance as well as adherence to State mobile home park closure requirements. In addition, mobile homes are eligible for rehabilitation assistance (see Program 1.2).

Program objectives and timeframe:

- Continue to support preservation of mobile home parks as an important affordable housing resource throughout the planning period.

Responsible parties:

- Community Development Department

Funding source:

- General Fund

2. Facilitate housing production commensurate with projected needs for households of all types and income levels

2.1 Adequate Sites to Accommodate Housing Needs

As discussed in Chapter IV - Constraints, City General Plan and zoning regulations provide for a variety of housing types at densities up to 50 units per acre, and higher densities can be achieved through density bonus provisions. The Town Center Specific Plan (TCSP) allows stand-alone multi-family development at up to 40 units per acre and mixed-use development at up to 50 units per acre. A Metrolink rail station lies within the northern portion of the TCSP area and TCSP regulations support mixed-use development close to transit and places of employment. The TCSP area provides the best opportunity for new housing development and the City will continue to encourage property owners and developers to pursue high-density residential and mixed-use development to accommodate housing needs at all income levels, including extremely-low-income units and housing for persons with special needs. Mixed-use can also reduce vehicle trips, make more efficient use of land and parking areas, and facilitate energy conservation.

While current land use and zoning designations provide substantial opportunities for additional housing, rezoning of additional sites will be necessary to accommodate the significant increase in housing need assigned to Covina for the 2021-2029 period in the RHNA. Appendix B includes an analysis of the inventory of sites as well as a list of candidate sites for rezoning to create additional capacity for housing.

As noted in Appendix B, there is currently a shortfall of capacity to accommodate the RHNA for lower-income units and above-moderate-income units. To address this shortfall the City will process zoning amendments for sufficient sites with appropriate densities during 2022 to fully accommodate the City's remaining housing need. Rezoned sites will be selected from the candidate sites listed in Appendix B, and sites to accommodate lower-income units will comply with Government Code §65583.2(h) and (i).

To ensure that adequate sites are available to accommodate the City's remaining share of regional housing need throughout the planning period, the City will comply with the *no net loss* provisions of *Government Code* §65863 through a project-by-project evaluation process. Pursuant to State law, the residential density for any parcel listed in Appendix B shall not be reduced below the level estimated in Appendix B unless the City makes written findings as required by §65863.

A current inventory of sites suitable for residential development will be made available to interested parties at the Community Development Department office and on the City's website.

Program objectives and timeframe:

- Provide adequate sites for housing development at all income levels commensurate with the RHNA through the rezoning of sufficient sites to accommodate the current shortfall of capacity by October 2022 in compliance with Government Code Sec. 65583.2(h) and (i).

- Ensure compliance with *no net loss* requirements throughout the planning period in compliance with Government Code Sec. 65863.
- Post the sites inventory on the City website throughout the planning period

Responsible parties:

- Community Development Department

Funding source:

- Grant funds; General Fund

2.2 Redevelopment of Underutilized Sites

Covina is a mature city with very little vacant land remaining; therefore, nearly all significant development opportunities involve the redevelopment of underutilized properties. The City will encourage property owners to pursue redevelopment that includes a mixed-use or multi-family residential component in appropriate locations. Examples of incentives the City can offer to encourage and facilitate residential redevelopment include:

- Density bonuses
- Flexible development standards (e.g., modified parking or other development standards)
- City support for affordable housing funding applications
- Priority processing for developments that include affordable units

Pursuant to Government Code Sec. 65583.2(g)(3) for any proposed development on a site that has had residential uses within the past five years that are or were subject to low- or very-low-income affordability restrictions, or are or were subject to any other form of rent or price control, or are or were occupied by low- or very-low-income households, the City shall require the replacement of all affordable units at the same or lower income level as a condition of development on the site. Replacement requirements shall be consistent with those set forth in Section 65915(c)(3).

Program objectives and timeframe:

- Encourage interested property owners to pursue redevelopment of underutilized properties through the provision of incentives and concessions. The City will encourage consolidation of adjacent parcels into larger development sites through concurrent processing of parcel maps with other entitlements throughout the planning period.
- Review changes to State law annually to ensure compliance with Government Code Sec. 65583.2(g)(3) and State Density Bonus requirements regarding the replacement of lower-income units.

Responsible parties:

- Community Development Department

Funding source:

- Grant funds; General Fund

2.3 Accessory Dwelling Units

Accessory dwelling units (also known as ADUs, second units or granny flats) can help to address a portion of the city's housing needs, particularly for small lower-income households. City zoning regulations permit ADUs by-right in all residential districts consistent with State law. The City will continue to monitor legislation and revise regulations as necessary to ensure conformance with current law.

Program objectives and timeframe:

- Monitor State legislation annually and revise ADU regulations as necessary to ensure conformance with State law
- Continue to encourage ADU construction throughout the planning period by providing information to interested homeowners

Responsible parties:

- Community Development Department

Funding source:

- Grant funds; General Fund

2.4 Housing for Low- and Moderate-income Households

The City will assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households through the following strategies:

- Priority processing for projects that include extremely-low-income affordable units
- Priority water/sewer service for projects that include lower-income units (AB 1087 of 2004)
- Provide assistance to developers in applying for affordable housing grant funding, such as LIHTC
- Provide incentives and concessions through density bonus regulations
- Streamlined ministerial review for qualifying developments (SB 35 of 2017)

Program objectives and timeframe:

- Facilitate development of affordable units commensurate with the RHNA allocation throughout the planning period

- Continue to implement density bonus regulations in conformance with State law
- Prepare internal guidance procedures for streamlined ministerial review pursuant to SB 35 in 2022

Responsible parties:

- Community Development Department

Funding source:

- Grant funds; General Fund

3. *Encourage home ownership for first-time buyers and low- and moderate-income households*

3.1 First-Time Homebuyer Assistance

Los Angeles County offers financing assistance to qualified first-time homebuyers through the Home Ownership Program (HOP), the Mortgage Credit Certificate (MCC) program and the Southern California Home Financing Authority (SCHFA) program. The City provides referral information on these programs at the public counter and on the City website.

Home Ownership Program (HOP)

The Los Angeles County Home Ownership Program (HOP) provides zero-interest loans with no repayment due until the home is sold, transferred, or refinanced. Maximum loan amount is \$80,000 or 20% of the purchase price, whichever is less. The loan is secured by a second trust deed. The home must be owner-occupied for the life of the loan.

Mortgage Credit Certificate (MCC) Program

The Mortgage Credit Certificate (MCC) program is a federal program that allows qualified first-time homebuyers to take an annual credit against federal income taxes of up to 20% of the annual interest paid on the applicant's mortgage. This enables homebuyers to have more income available to qualify for a mortgage loan and make the monthly mortgage payments. The value of the MCC must be taken into consideration by the mortgage lender in underwriting the loan and may be used to adjust the borrower's federal income tax withholding. The MCC program has covenant restrictions to ensure the affordability of the participating homes for a period of 15 years. MCCs can be used in conjunction with the Home Ownership Program (HOP).

Southern California Home Financing Authority (SCHFA)

SCHFA is a joint powers authority between Los Angeles and Orange Counties formed in 1988 to create first-time homebuyer programs for low- to moderate-income households. For more than 25 years, SCHFA has helped thousands of individuals and families fulfill their dreams of owning a home. This program makes buying a home more affordable for qualifying homebuyers by offering a competitive 30-year fixed-rate loan and a grant for

down-payment and closing costs assistance. The program is administered by the Los Angeles County Development Authority (LACDA) and the Public Finance Division of the County of Orange. SCHFA does not lend money directly to homebuyers. Homebuyers must work directly with a participating lender.

Program objectives and timeframe:

- Continue to promote these home ownership programs and provide information to interested homebuyers throughout the planning period.

Responsible parties:

- Community Development Department

Funding source:

- Grant funds; General Fund

4. *Mitigate potential constraints to housing for households of all economic levels and persons with disabilities*

4.1 Reasonable Accommodation for Persons with Disabilities

State law requires cities to make reasonable accommodation for housing occupied by persons with disabilities, including developmental disabilities. The Municipal Code establishes procedures for reviewing and approving requests for reasonable housing accommodations in conformance with fair housing law. The City will continue to implement the Reasonable Accommodation ordinance throughout the planning period.

Program objectives and timeframe:

- Continue to implement reasonable accommodation procedures for persons with disabilities in compliance with State law throughout the planning period.

Responsible parties:

- Community Development Department

Funding source:

- General Fund

4.2 Emergency Shelters, Low Barrier Navigation Centers and Transitional/Supportive Housing

State law requires that emergency shelters must be allowed by-right in at least one zone, and transitional and supportive housing must be regulated as residential uses subject only to the same standards as apply to other residential uses of the same type in the same zone. In addition, low barrier navigation centers must be permitted in areas zoned for mixed use and in nonresidential zones permitting multi-family uses. The Zoning Ordinance establishes regulations for emergency shelters, low barrier navigation centers, transitional housing and

supportive housing in compliance with State law. Supportive housing is particularly important for persons living with developmental disabilities.

In 2017, the City received a Measure H grant from the County of Los Angeles to fund the preparation of a *City Plan to Combat Homelessness*. The Plan includes the following strategies and information:

- Assess the resources currently available in Covina to address the homeless challenge;
- Identify opportunities for Covina to collaborate with the County of Los Angeles and neighboring cities on initiatives to address homelessness; and,
- Identify how Covina can coordinate efforts and resources to collaborate with the County of Los Angeles and neighboring cities to achieve mutual goals.

On February 28, 2018 two Homeless Plan Visioning Workshops were held with homeless services providers, faith-based groups, business owners, and other community members to provide feedback and information and outline plan goals and supporting actions. The Plan was adopted by the City Council on June 5, 2018. The City of Covina is continuing to work cooperatively with the County and other San Gabriel Valley cities to facilitate the establishment of additional facilities and services to address the needs of the homeless population.

Since adoption of the Plan, the City of Covina has applied for two Measure H grants through the County. The City has been awarded a Priority 1 grant to identify housing and work with discharge planners for 5150 holds in local hospitals, and a Priority 2 grant. The Priority 2 grant is a multi-city grant with the cities of Azusa, Glendora, Duarte, and West Covina. West Covina will be the fiscal agent, and the grant will provides for five housing navigators, one in each of the five cities, to provide services to homeless persons. The Priority 2 grant also requires matching funds by the cities.

Program objectives and timeframe:

- Continue to implement the Zoning Ordinance to allow emergency shelters, transitional/supportive housing and low barrier navigation centers pursuant to State law, including AB 2162 of 2018 regarding supportive housing throughout the planning period.
- Work cooperatively with the County and other San Gabriel Valley cities to facilitate the provision of additional services and facilities to assist homeless persons and families throughout the planning period

Responsible parties:

- Community Development Department

Funding source:

- General Fund

4.3 Development Standards and Review Procedures

Development standards, such as density/intensity limits, off-street parking requirements, and permit review procedures, can pose a constraint to housing development if they are excessive.

In 2019 the City adopted a major amendment to the Town Center Specific Plan, which is adjacent to the Metrolink commuter rail station. To ensure that TCSP development standards effectively facilitate additional housing development, the City will review current standards and if any are found to unreasonably hinder residential development or the achievement of maximum allowable densities, an amendment to the specific plan will be processed.

To ensure that permit review procedures do not unreasonably hinder housing development, the City will also reevaluate Site Plan Review procedures and criteria, and process an amendment to the requirements in 2022 if they are found to have an unreasonable impact on the cost and supply of housing.

Program objectives and timeframe:

- Review TCSP development standards and process an amendment in 2022 if they are found to unreasonably limit the ability to achieve allowable densities.
- Reevaluate Site Plan Review procedures and criteria and process an amendment to the requirements in 2022 if they are found to have an unreasonable impact on the cost and supply of housing.
- Post City development standards and fees on the City website throughout the planning period in compliance with transparency requirements

Responsible parties:

- Community Development Department

Funding source:

- General Fund; grant funds

5. *Affirmatively further fair housing and equal housing opportunities for all persons*

5.1 Affirmatively Further Fair Housing

Fair housing law requires equal housing opportunities for all persons regardless of race, religion, gender, family size, marital status, ancestry, national origin, color, age, or physical disability. "Affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs

and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all public agency's activities and programs relating to housing and community development.

The Housing Rights Center (<http://www.hrc-la.org>) provides fair housing information, landlord/tenant counseling, discrimination complaint investigation, education and training in Los Angeles County, including Covina. The City will continue to support the Housing Rights Center through placement of fair housing service brochures at the public counter and other governmental offices, and on the City website.

In addition, pursuant to Government Code Section 8899.50(b), the City will continue to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing and will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

Program objectives and timeframe:

- Continue to promote fair housing practices, provide educational information on fair housing to the public, and cooperate with other organizations in providing fair housing information to landlords and tenants as well as at libraries, senior centers, recreation centers, and Social Security and employment offices throughout the planning period
- Continue to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and take no action that is materially inconsistent with the obligation to affirmatively further fair housing throughout the planning period
- Continue to refer fair housing complaints to the Housing Rights Center throughout the planning period

Responsible parties:

- Community Development Department; Housing Rights Center

Funding source:

- General Fund; grant funds

Table VI-1 describes the City's quantified objectives for the 2021-2029 planning period.

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

	Income Category					Totals
	Ex. Low	V. Low	Low	Mod	Above Mod	
New construction ^a	307	307	268	281	747	1,910
Rehabilitation	16-32			0	0	16-32
Conservation ^b	124		145	162	0	431

a Quantified objective for the extremely-low category is half of the very-low RHNA allocation consistent with State law

b Existing assisted affordable units

Appendix A

Evaluation of the Prior Housing Element

Section 65588(a) of the *Government Code* requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. Table A-1 summarizes the prior Housing Element programs and the extent to which they have been successful in achieving the City's goals, objectives and policies during the previous planning period.

**Table A-1
Prior Housing Element Program Evaluation**

Housing Program	Objectives	Time Frame	Implementation Status
1.1 Code Compliance	Continue to implement the code compliance program and direct eligible households to available rehabilitation assistance in order to address code violations.	Throughout the planning period	The City continued to implement this program.
1.2 Housing Rehabilitation and Preservation	Facilitate minor repair and rehabilitation assistance for 2 to 4 units annually.	Throughout the planning period	14 units were provided rehabilitation assistance during 2014-2021
1.3. Section 8 Rental Assistance	Continue to direct eligible households to the County Housing Authority's Section 8 program.	Throughout the planning period	The City continued to direct eligible households to the County Housing Authority's Section 8 program
1.4 Preservation of Assisted Housing	Preserve 100% of the assisted affordable units in the city	Throughout the planning period	No deed-restricted units were converted to market rate during 2014-2021.
1.5. Mobile Home Park Preservation	Continue to support preservation of its mobile home parks as an important affordable housing resource.	Throughout the planning period	The City continued to support preservation of its mobile home parks
2.1 Adequate Sites to Accommodate Housing Needs	Maintain adequate sites for housing development at all income levels in conformance with the RHNA throughout the planning period and ensure compliance with no net loss requirements.	Throughout the planning period	The City continued to maintain adequate sites to accommodate the RHNA allocation
2.2 Redevelopment of Underutilized Sites	Encourage interested property owners to pursue redevelopment of underutilized properties through the provision of incentives and concessions. The City will encourage consolidation of adjacent parcels into larger development sites through concurrent processing of parcel maps with other entitlements. • Ensure compliance with Government Code Sec. 65583.2(g)(3) and State Density Bonus requirements regarding the replacement of lower-income units	Throughout the planning period	The City continued to encourage interested property owners to pursue redevelopment of underutilized properties and lot consolidation. Preparation of mixed use overlay district regulations are currently in process.
2.3 Accessory Dwelling Units	<ul style="list-style-type: none"> Process a Zoning Ordinance amendment in 2020 to revise ADU regulations in conformance with current State ADU law Continue to encourage ADU construction in the city 	Zoning amendment in 2020	The City adopted Ordinance 20-10 in 2020 updating ADU regulations in conformance with State law.
2.4 Housing for Low- and Moderate-income Households	<ul style="list-style-type: none"> Facilitate development of affordable units commensurate with the RHNA allocation during the planning period Code amendment in 2020 to establish density bonus regulations in conformance with State law Prepare internal guidance procedures in 2020 for streamlined ministerial review pursuant to SB 35 	Zoning amendment and SB 35 procedures in 2020	The City adopted Ordinance 20-10 in 2020 updating density bonus regulations in conformance with State law. No density bonus projects were proposed.
3.1 First-Time Homebuyer Assistance	Continue to promote these home ownership programs and provide information to interested homebuyers.	Throughout the planning period	The City continued to promote home ownership programs and provide information to interested homebuyers.
4.1 Reasonable Accommodation for Persons with Disabilities	Process a Municipal Code amendment in 2020 to establish reasonable accommodation procedures for persons with disabilities in compliance with State law	Code amendment in 2020	The City adopted Ordinance 20-10 in 2020 establishing reasonable accommodation procedures in conformance with State law.

Housing Program	Objectives	Time Frame	Implementation Status
4.2 Emergency Shelters, Low Barrier Navigation Centers and Transitional/ Supportive Housing	<ul style="list-style-type: none"> Process a Zoning Ordinance amendment in 2020 to allow emergency shelters, low barrier navigation centers and transitional/supportive housing pursuant to State law, including AB 2162 of 2018 regarding supportive housing Work cooperatively with the County and other San Gabriel Valley cities to facilitate the provision of additional facilities and services to assist homeless persons and families 	Code amendment in 2020	The City adopted Ordinance 20-10 in 2020 establishing regulations for emergency shelters, low barrier navigation centers and transitional/supportive housing in conformance with State law.
4.3 Residential Care Facilities	Process a Municipal Code amendment in 2020 to establish regulations for residential care facilities in compliance with State law	Code amendment in 2020	The City adopted Ordinance 20-10 in 2020 establishing regulations for residential care facilities in conformance with State law.
4.4 Definition of <i>Family</i>	Process a Municipal Code amendment in 2020 to establish a definition of <i>family</i> in compliance with State law	Code amendment in 2020	The City adopted Ordinance 20-10 in 2020 establishing a definition of family in conformance with State law.
4.5 Employee Housing	Process a Municipal Code amendment in 2020 to allow qualifying employee housing in compliance with the Employee Housing Act.	Code amendment in 2020	The City adopted Ordinance 20-10 in 2020 establishing regulations for employee housing in conformance with State law.
4.6 Development Standards and Review Procedures	<ul style="list-style-type: none"> Process a Code amendment in 2020 to eliminate the requirement for an enclosed garage in residential developments outside the TCSP area. Review TCSP development standards and process an amendment by 2021 if they are found to unreasonably limit the ability to achieve allowable densities. Reevaluate Site Plan Review procedures and criteria, and process an amendment to the requirements by 2021 if they are found to have an unreasonable impact on the cost and supply of housing. 	Parking Code amendment in 2020 Review TCSP development standards and site plan review procedures by 2021	The City adopted Ordinance 20-10 in 2020 amending parking regulations to eliminate the requirement for an enclosed garage in multi-family housing.
5.1 Affirmatively Further Fair Housing	<ul style="list-style-type: none"> Continue to promote fair housing practices, provide educational information on fair housing to the public, and cooperate with other organizations in providing fair housing information to landlords and tenants as well as at libraries, senior centers, recreation centers, and Social Security and employment offices Continue to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing and will take no action that is materially inconsistent with its obligation to affirmatively further fair housing Continue to refer fair housing complaints to the Housing Rights Center 	Throughout the planning period	The City continued to affirmatively further fair housing through educational information and cooperation with fair housing organizations.

Appendix B Residential Land Inventory

This appendix describes the methodology and analysis used to determine the City’s residential land inventory for the 2021-2029 planning period.

Methodology for Income Category and Realistic Capacity

Based on the “default density” provisions of State law⁹, sites of at least one-half acre zoned to allow multi-family or mixed-use development at 30+ units/acre are deemed suitable for any income category, while sites allowing a density less than 30 units per acre are considered suitable for moderate- or above-moderate-income housing. Sites smaller than one-half acre are assigned to either the moderate or the above-moderate category.

Inventory of Potential Sites to Accommodate the RHNA

As noted in Chapter II, **Table III-28** the City’s Regional Housing Needs Assessment (RHNA) by income category for the 2021-2029 period is as follows:

Very-low	614 units
Low	268 units
Moderate	281 units
<u>Above-moderate</u>	<u>747 units</u>
Total –	1,910 units

The City’s inventory of sites to accommodate the RHNA is comprised of three components:

- Approved and pending projects (Table B-2)
- Underutilized sites with realistic potential for residential development (Table B-3)
- Potential accessory dwelling units (ADUs)

The estimated potential capacity for additional residential development on these sites is summarized in Table B-1 and described further in the following analysis.

⁹ California Government Code §65583.2(c)(3)(B)(iv)

**Table B-1
Sites Inventory Summary**

	Income Category				
	VL	Low	Mod	Above Mod	Total
Approved and Pending Projects (Table B-2)	-	-	278	247	525
Underutilized Sites (Table B-3)	597	85	26	188	896
Potential ADUs	17	32	1	22	72
Totals	614	117	305	457	1,493
RHNA 2021 - 2029	614	268	281	747	1,910
Shortfall?	No	(151)	No	(266)	(417)

Source: City of Covina, 2021

Approved and Pending Projects

Residential and mixed-use projects that have received some form of entitlement or are currently under review are listed in Table B-2. These units are assigned to income categories based on the expected rents or sales prices.

Underutilized Sites

Underutilized (non-vacant) sites with realistic potential for residential development are listed in Table B-3. All of these sites have current General Plan and zoning designations that allow multi-family or mixed-use development and existing uses that do not impede development during the planning period.

Pursuant to Government Code Sec. 65583.2(g)(2) when a city is relying on nonvacant sites to accommodate 50 percent or more of its lower-income housing need, the methodology used to determine additional development potential shall demonstrate that the existing use does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.

As in many of the highly urbanized cities in the Los Angeles metro area, Covina has almost no vacant land suitable for residential development. Most new residential and mixed-use development in Covina and surrounding areas is occurring through infill redevelopment of properties where the previous use has become economically obsolete. In recent years, several examples of such redevelopment have been approved in Covina and adjacent areas. The City encourages redevelopment of underutilized properties through land use plans and regulations such as the Town Center Specific Plan (TCSP) that covers an area of approximately 226 acres adjacent to the Covina Metrolink station (see Chapter V - Constraints for discussion of the TCSP).

All of the sites have one or more of the following factors that enhance the potential for redevelopment:

- Location near high-quality transit
- Vacant buildings or lower-value uses such as surface parking or storage
- Low value of site improvements compared to land value (I/L ratio)

- Structures more than 50 years old
- Adjacent sites that could be consolidated to accommodate larger developments
- Low development intensity/density compared to the allowable density/intensity
- Existing buildings are nonconforming and the prior uses may not be legally resumed
- Other nearby sites within the Town Center Specific Plan area have recently been approved for housing development (see Table B-2)

For all of these reasons, the sites listed in Table B-3 are considered suitable for redevelopment and existing uses on non-vacant sites do not impede redevelopment during the planning period.

Sites Listed in a Prior Housing Element Cycle

Pursuant to Government Code Sec. 65583.2(c), a nonvacant site identified in a prior housing element and a vacant site that has been included in two or more consecutive planning periods shall not be deemed adequate to accommodate a portion of the housing need for lower income households in the current planning period unless the site is zoned to allow development at the “default density” and the site is subject to a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower income households. Sites listed in Table B-3 that were identified in a prior planning period are noted and Program 2.1 addresses the requirements of Government Code Sec. 65583.2(c).

Availability of Infrastructure

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

Potential Environmental Constraints

There are no significant environmental constraints that would preclude development of sites listed in Table B-3 during the planning period. However, it should be noted that State environmental laws regarding Native American consultation often add to development time and cost due to the requirement for developers to negotiate with tribal representatives regarding mitigation, which typically requires paying Native American representatives to monitor construction activities.

Potential Accessory Dwelling Units

Under State law, two accessory dwelling units (ADUs) – one ADU and one “junior ADU - 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.

In late 2020, SCAG published a study of ADU affordability in Southern California¹⁰ and concluded that a significant portion of ADUs built recently have been affordable to low- and moderate-income households. SCAG determined that the following affordability assumptions are appropriate for inland portions of Los Angeles County:

¹⁰ https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527

Very Low	Low	Moderate	Above Moderate
24%	45%	2%	30%

Source: SCAG 2020

ADU permits during the 2018-2020 period in Covina were as follows:

2018: 1
 2019: 3
 2020: 23

Based on this trend and SCAG's analysis, it is assumed that an average of 9 ADUs per year (72 total ADUs) will be produced in the following income categories during the 2021-2029 planning period.

Very Low	Low	Moderate	Above Moderate
17	32	1	22

Candidate Sites for Rezoning

As seen in Table B-1, the current capacity for additional housing is insufficient to accommodate the RHNA allocation in all income categories. As required by Government Code Sec. 65583(c)(1) candidate sites have been identified for rezoning to create additional capacity for residential or mixed-use development. Table B-4 provides a parcel-specific listing of candidate sites to be considered for rezoning as described in Program 2.1 of the Housing Plan.

The selection of candidate sites was based on the following factors:

- Residential development interest expressed by property owners or developers
- Site conditions indicating a property is suitable for development or redevelopment during the planning period, such as vacant buildings, for sale/for lease signs, low improvements-to-land (I/L) value ratio, buildings more than 50 years old, signs of deferred maintenance or deterioration, or low site utilization (i.e., current building floor area compared to market potential)
- Proximity to public transportation, employment and educational opportunities, and urban services such as shopping, medical facilities and parks
- No incompatible uses or adverse development conditions such as high noise levels, heavy truck traffic, sensitive biological habitat, flood hazards or wildland fire hazards

Affirmatively Furthering Fair Housing

Housing Element law (Government Code Sec. 65583.2(a)) requires the inventory of sites to be consistent with fair housing objectives. As described above, the sites inventory is comprised of approved and pending projects (Table B-2), underutilized sites with realistic potential for residential development (Table B-3), and potential accessory dwelling units (ADUs). Because the current capacity of these sites is not sufficient to fully accommodate the RHNA allocation in all income categories, additional candidate sites for rezoning are identified in Table B-4.

The focus of the sites inventory fair housing analysis is on opportunities for low- and moderate-income housing. Opportunities for additional affordable housing are accommodated through high-density multi-family developments and through ADUs. The sites inventory addresses fair housing objectives throughout the community by encouraging high-density multi-family development in the Town Center Specific Plan area, which provides excellent access to opportunities such as transportation, jobs, schools, public services, medical care and shopping. Potential ADUs also create opportunities for affordable housing dispersed throughout the city in low-density residential neighborhoods. Through these two strategies, affordable housing choices for protected classes are expanded in all residential and mixed-use areas of Covina.

The issue of displacement will be addressed through compliance with Government Code Sec. 65583.2(g)(3), included in Program 2.2, which requires that for any proposed development on a site that has had residential uses within the past five years that are or were subject to lower-income affordability restrictions, or are or were subject to any other form of rent or price control, or are or were occupied by lower-income households, the City shall require the replacement of all affordable units at the same or lower income level as a condition of development on the site. Replacement requirements shall be consistent with those set forth in Section 65915(c)(3).

**Table B-2
Approved and Pending Projects**

Address	APN	Project Type	Status	Density (units/acre)	Units					Notes
					VL	Low	Mod	Above	Total	
137 W SAN BERNARDINO RD & 141 W GENEVA PL	8431-014-008 8431-014-015 8431-015-042	Mixed use (townhouse + stacked flats)	SPR/TTM approved 6/16/2020	30.4	-	-	40	121	161	Former Clippinger Chevrolet; 4-story mixed-use project with 161 housing units and 15,000 sf commercial on 5.3 acres. Merger of 3 lots.
129-137 W. Orange Street	8428-028-030 8428-028-031	Townhouse	SPR/TTM approved 4/17/2018	27			8		8	Under construction
155 E. San Bernardino Road	8430-024-012	Mixed use (stacked flats)	SPR/TTM approved 6/5/2019	20			10		10	
N. Citrus Avenue and E. Covina Boulevard (1162 N. Citrus)	8406-019- 019, 8406- 019-020 8406-019-017	Townhouse	SPR/TTM Approved 11/29/2016	19				117	117	Under construction (Meritage Homes)
135 E Badillo	8445-009-911 8445-009-912	Mixed use (stacked flats)	SPR Approved 1/22/2019	40.7			10		10	Mixed use with 3,821 sq. ft commercial on ground floor and 10 units on second and third floors.
143 W. Center St.	8444-001-014	Single-family detached	SPR Approved 1/14/2020	15				3	3	
546 North Lark Ellen Ave	8434-004-003	Townhouse	SPR Approved 10/8/2019	15.5				6	6	
1060 W. San Bernardino Rd 1013, 1085 & 1111 W Badillo	8434-017-007 8434-018-020 8434-017-008 8434-018-021 8434-017-009	Townhouse	SPR/TTM	25.4			132		132	Site is 5.2 acres. Mixed use project with 132 units and 12,000 square feet commercial and office space. In process and pending approval.
1201 W. Badillo Street	8434-017-021 8434-017-022 8434-016-019 8434-016-020	Apartments	SPR	23			28		28	Site is 1.22 acres. In process and pending approval.
529 Cutter Way	8434-013-010	Stacked units	SPR/TTM	21.7			50		50	Site is 2.3 acres. 39 units and 11 live/work units. In process and pending approval.
Totals					-	-	278	247	525	

Source: City of Covina, 2021

**Table B-3
Underutilized Sites**

Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Lower	Moderate	Above Moderate	Total Capacity
8445-019-007	A	Town Center Specific PI	Resi.Town Center East	14	0.24	1 residential		1	2	3
8445-019-008	A	Town Center Specific PI	Resi.Town Center East	14	0.16	1 residential		1	2	3
8430-015-021		Town Center Specific PI	TOD/HDR	50	2.77	1 industrial bldg	138			138
8431-013-013	B	Town Center Specific PI	F.A.I.R.	40	0.35	1 packing house	14			14
8431-013-015	B	Town Center Specific PI	F.A.I.R.	40	1.43	outdoor storage	57			57
8444-008-005		Town Center Specific PI	Mixed-use	22	0.24	vacant		4		4
8445-010-009	C	Town Center Specific PI	Mixed-use	40	0.39	parking lot	15			15
8445-010-812	C	Town Center Specific PI	Mixed-Use	40	0.1	GTE unmanned	4			4
8445-010-810	C	Town Center Specific PI	Mixed-use	40	1.01	GTE unmanned	40			40
8445-011-901		Town Center Specific PI	Mixed-use	22	0.25	Bank ATM		6		6
8431-015-024		Town Center Specific PI	Mixed-use	22	0.27	vacant		6		6
8430-015-020		Town Center Specific PI	F.A.I.R.	40	2.57	industrial bldg	100			100
8430-018-014		Town Center Specific PI	F.A.I.R.	40	1.87	industrial bldg	75			75
8430-019-010		Town Center Specific PI	F.A.I.R.	40	0.89	auto repair	35			35
8430-020-012	D	Town Center Specific PI	F.A.I.R.	14	0.16	1 residential			2	2
8430-020-030	D	Town Center Specific PI	F.A.I.R.	14	0.21	1 residential			3	3
8430-022-008	E	Town Center Specific PI	F.A.I.R.	14	0.1	industrial bldg		2		2
8430-022-007	E	Town Center Specific PI	F.A.I.R.	14	0.09	industrial bldg		2		2
8430-022-006	E	Town Center Specific PI	F.A.I.R.	14	0.09	industrial bldg		2		2
8430-022-004	E	Town Center Specific PI	F.A.I.R.	14	0.17	industrial bldg		2		2
8430-022-017	F	Town Center Specific PI	F.A.I.R.	14	0.16	industrial bldg			2	2
8430-022-016	F	Town Center Specific PI	F.A.I.R.	14	0.16	industrial bldg			2	2
8430-023-012	F	Town Center Specific PI	F.A.I.R.	14	0.11	industrial bldg			2	2
8430-023-012	G	Town Center Specific PI	F.A.I.R.	14	0.05	industrial bldg			2	2
8430-023-013	G	Town Center Specific PI	F.A.I.R.	14	0.05	industrial bldg			2	2
8430-023-014	G	Town Center Specific PI	F.A.I.R.	14	0.05	industrial bldg			2	2
8430-025-018		Town Center Specific PI	F.A.I.R.	40	0.54	partially vacant	22			22
8445-008-003		Town Center Specific PI	Cultural Core	14	0.24	parking lot			3	3
8401-018-127		HDR	RD 2000	22	0.63	1 residential			14	14
8401-014-010	H	MDR	RD 2000	14	1.53	church			22	22
8401-014-030	H	MDR	RD 3000	14	0.39	1 residential			6	6
8401-014-126	H	MDR	RD 3000	14	0.63	1 residential			9	9
8401-014-024	H	MDR	RD 3000	14	0.45	1 residential			6	6
8401-014-020	H	MDR	RD 3000	14	0.45	1 residential			6	6
8401-014-017	H	MDR	RD 3000	14	0.45	1 residential			6	6
8401-014-018	H	MDR	RD 3000	14	0.45	1 residential			6	6
8431-029-006	J	Town Center Specific PI	Neighborhood	14	0.1	parking lot			2	2

Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Lower	Moderate	Above Moderate	Total Capacity
8431-029-007	J	Town Center Specific PI	Neighborhood	14	0.1	parking lot			1	1
8431-014-019	K	Town Center Specific PI	Mixed-use	22	0.39	auto repair			8	8
8431-014-020	K	Town Center Specific PI	Mixed-use	22	0.26	auto repair			6	6
8431-015-005	L	Town Center Specific PI	Mixed-use	22	0.18	used car lot			22	22
8431-015-038	L	Town Center Specific PI	Mixed-use	22	0.13	1-story office				
8431-015-039	L	Town Center Specific PI	Mixed-use	22	0.21	1 story office				
8431-015-043	L	Town Center Specific PI	Mixed-use	22	0.29	2-story office				
8431-015-024	L	Town Center Specific PI	Mixed-use	22	0.27	vacant				
8445-010-810	M	Town Center Specific PI	Mixed-use	31	1.01	parking lot	31			31
8445-010-809	M	Town Center Specific PI	Mixed-use	31	0.08	parking lot				
8430-024-009		Town Center Specific PI	F.A.I.R.	25	0.5	plant nursery			12	12
8430-018-009		Town Center Specific PI	TOD/HDR	40	5.9	industrial bldg	151			151
8444-010-028		HDR	RD-1250	22	0.77	unoccupied bldgs			10	10
8434-016-020		HDR	RD-1500	22	1.27	10 units			28	28
Totals							682	26	188	896

Source: Los Angeles County Assessor, City of Covina, 2021

**Table B-4
Candidate Sites for Rezoning**

Address	ZIP	APN	Low	Mod	Above Mod	Parcel Size (Ac)	Current GP	Current Zoning	Proposed GP	Proposed Zoning	Min Density	Max Density	Total Capacity	Vacant/ Nonvacant	Existing Uses	Optional Information1	Optional Information2
412 W Arrow Hwy	91722	8407-032-002	152			6.33	GC	C-3A (PCD)	GC	C-3A (MUOD)	22	40	152	Non-Vacant	commercial	60% res	
321 N Vincent Ave	91722	8435-033-023	43			1.78	GC	C-2	GC	C-2 (MUOD)	22	40	43	Non-Vacant	commercial	60% res	
433 N Vincent Ave	91722	8435-033-017	12			0.51	GC	C-2	GC	C-2 (MUOD)	22	40	12	Non-Vacant	commercial	60% res	
333 N Vincent Ave	91722	8435-033-028	44			1.84	GC	C-2	GC	C-2 (MUOD)	22	40	44	Non-Vacant	commercial	60% res	
No address	91722	8435-033-024	66			2.76	GC	C-2	GC	C-2 (MUOD)	22	40	66	Vacant	vacant	60% res	
529 Cutter Way	91722	8434-013-010			51	2.3	LI	M-1	LI	M-1 (MUOD)		22	51	Non-Vacant	church		
528 E Theiborn St	91724	8451-009-041			5	0.38	LDR	R-1-10,000	MDR	RD-3000	7	14	5	Non-Vacant	1 sf		
528 E Theiborn St	91724	8451-009-042			4	0.28	LDR	R-1-10,000	MDR	RD-3000	7	14	4	Vacant			
528 E. Theiborn St	91724	8451-009-040			4	0.28	LDR	R-1-10,000	MDR	RD-3000	7	14	4	Vacant			
528 E. Theiborn St	91724	8451-009-039			3	0.31	LDR	R-1-10,000	MDR	RD-3000	7	14	3	Vacant			
1004 N Glendora	91724	8403-002-026			5	0.4	LDR	R-1-10,000	MDR	RD-3000	7	14	5	Non-Vacant	1 sf		
980 N Glendora	91724	8423-002-027			7	0.5	LDR	R-1-10,000	MDR	RD-3000	7	14	7	Non-Vacant	1 sf		
966 N Glendora	91724	8423-002-042			11	0.84	LDR	R-1-10,000	MDR	RD-3000	7	14	11	Non-Vacant	1 sf		
1050 W Badillo	91722	8442-005-035			17	1.26	LDR	R-1-10,000	MDR	RD-3000	7	14	17	Non-Vacant	1 sf		
1082 W Badillo	91722	8442-005-034			11	0.84	LDR	R-1-10,000	MDR	RD-3000	7	14	11	Non-Vacant	1 sf		
302 E San Bernardino	91723	8430-030-027			12	0.52	GC	CP	GC	CP (MUOD)	14	40	12	Non-Vacant	commercial	60% res	
322 E San Bernardino	91723	8430-030-036			5	0.19	GC	C-5	GC	C-5 (MUOD)	14	40	5	Non-Vacant	auto repair	60% res	
328 E San Bernardino	91723	8430-030-037			5	0.2	GC	C-5	GC	C-5 (MUOD)	14	40	5	Non-Vacant	office	60% res	
336 E San Bernardino	91723	8430-030-033			5	0.19	GC	C-5	GC	C-5 (MUOD)	14	40	5	Non-Vacant	2 units	60% res	
336 E San Bernardino	91723	8430-030-032			5	0.2	GC	C-5	GC	C-5 (MUOD)	14	40	5	Vacant		60% res	
348 E San Bernardino	91723	8430-030-031			5	0.21	GC	C-5	GC	C-5 (MUOD)	14	40	5	Non-Vacant	commercial	60% res	
354 E San Bernardino	91723	8430-030-035			4	0.16	GC	C-5	GC	C-5 (MUOD)	14	40	4	Non-Vacant	1 sf	60% res	
360 E San Bernardino	91723	8430-030-012			6	0.26	GC	C-5	GC	C-5 (MUOD)	14	40	6	Non-Vacant	auto repair	60% res	
368 E San Bernardino	91723	8430-030-034			5	0.23	GC	C-5	GC	C-5 (MUOD)	14	40	6	Non-Vacant	1 sf	60% res	
376 E San Bernardino	91723	8430-030-038			3	0.12	GC	C-5	GC	C-5 (MUOD)	14	40	3	Non-Vacant	commercial	60% res	
380 E San Bernardino	91723	8430-032-016			9	0.37	GC	C-5	GC	C-5 (MUOD)	14	40	9	Non-Vacant	auto repair	60% res	
402 E San Bernardino	91723	8430-032-012			12	0.51	GC	C-2	GC	C-2 (MUOD)	14	40	12	Non-Vacant	commercial	60% res	
430 E San Bernardino	91723	8430-034-024			8	0.34	GC	C-2	GC	C-2 (MUOD)	14	40	8	Non-Vacant	commercial	60% res	
442 E San Bernardino	91723	8430-034-006			4	0.16	GC	C-2	GC	C-2 (MUOD)	14	40	4	Non-Vacant	restaurant	60% res	
452 E San Bernardino	91723	8430-034-029			5	0.19	GC	C-2	GC	C-2 (MUOD)	14	40	5	Non-Vacant	restaurant	60% res	
456 E San Bernardino	91723	8430-034-028			4	0.17	GC	C-4	GC	C-4 (MUOD)	14	40	4	Non-Vacant	restaurant	60% res	
468 E San Bernardino	91723	8430-034-030			11	0.46	GC	C-2	GC	C-2 (MUOD)	14	40	11	Non-Vacant	commercial	60% res	
500 E San Bernardino	91723	8429-035-012	1	1	10	0.52	GC	C-4	GC	C-4 (MUOD)	14	40	12	Non-Vacant	restaurant	60% res	
524 E San Bernardino	91723	8429-035-005			8	0.33	GC	C-4	GC	C-4 (MUOD)	14	40	8	Non-Vacant	commercial	60% res	
532 E San Bernardino	91723	8429-035-004			7	0.28	GC	C-4	GC	C-4 (MUOD)	14	40	7	Non-Vacant	commercial	60% res	
554 E San Bernardino	91723	8429-035-021	2	3	26	1.3	GC	C-4	GC	C-4 (MUOD)	14	40	31	Non-Vacant	office	60% res	
566 E San Bernardino	91723	8429-035-020	1	1	8	0.42	GC	C-4	GC	C-4 (MUOD)	14	40	10	Non-Vacant	commercial	60% res	
578 E San Bernardino	91723	8429-035-001			5	0.19	GC	C-4	GC	C-4 (MUOD)	14	40	5	Non-Vacant	funeral home	60% res	
19102 E San Bernardino	91723	8429-032-001	1	1	7	0.38	GC	C-5	GC	C-4 (MUOD)	14	40	9	Non-Vacant	restaurant	60% res	
440 N Barranta	91723	8429-035-006			7	0.29	GC	C-4	GC	C-4 (MUOD)	14	40	7	Non-Vacant	commercial	60% res	
430 N Barranta	91723	8429-035-007			6	0.26	GC	C-4	GC	C-4 (MUOD)	14	40	6	Non-Vacant	commercial	60% res	
426 N Barranta	91723	8429-035-008			6	0.25	GC	C-4	GC	C-4 (MUOD)	14	40	6	Non-Vacant	office	60% res	
412 N Barranta	91723	8429-035-009			5	0.22	GC	C-4	GC	C-4 (MUOD)	14	40	5	Non-Vacant	office	60% res	

Address	ZIP	APN	Low	Mod	Above Mod	Parcel Size (Ac)	Current GP	Current Zoning	Proposed GP	Proposed Zoning	Min Density	Max Density	Total Capacity	Vacant/ Nonvacant	Existing Uses	Optional Information1	Optional Information2
520 Rue Royal	19723	8429-035-019			4	0.16	GC	C-4	GC	C-4 (MUOD)	14	40	4	Non-Vacant	auto repair	60% res	
544 Rue Royal	91723	8429-035-015	1	2	5	0.61	HDR	C-P	HDR	RD-2000	15	22	8	Non-Vacant	office	fire damage	nonconforming
404 N Barranca	91723	8429-035-018			6	0.26	GC	C-4	GC	C-4 (MUOD)	14	40	6	Non-Vacant	industrial	60% res	
121 W Dexter	91723	8444-008-031			8	0.35	GC	C-3	GC	C-3 (MUOD)	14	40	8	Non-Vacant	auto repair	60% res	
127 W Dexter	91723	8444-008-017			5	0.19	GC	TC-C	GC	TC-C (MUOD)	14	40	5	Non-Vacant	auto repair	60% res	
131 W Dexter	91723	8444-008-019			10	0.43	GC	TC-C	GC	TC-C (MUOD)	14	40	10	Non-Vacant	auto repair	60% res	
241 S Citrus	91723	8444-008-032			9	0.39	GC	C-3	GC	C-3 (MUOD)	14	40	9	Non-Vacant	auto repair	60% res	
345 S Citrus	91723	8444-009-010			49	2.04	GC	C-3A	GC	C-3A (MUOD)	14	40	49	Vacant	1 structure	60% res	nonconforming
405 S Citrus	91723	8444-021-005			125	5.19	GC	C-3	GC	C-3 (MUOD)	14	40	125	Non-Vacant	commercial	60% res	
501 S Citrus	91723	8444-021-004			16	0.68	GC	C-4	GC	C-4 (MUOD)	14	40	16	Non-Vacant	car wash	60% res	
515 S Citrus	91723	8444-022-001			17	0.71	GC	C-4	GC	C-4 (MUOD)	14	40	17	Non-Vacant	car wash	60% res	
562 W ARROW HWY	91722	8408-020-015			11	0.44	GC	C-2	GC	C-2 (MUOD)	14	40	11	Vacant	commercial	60% res	built in 1950's
536 W ARROW HWY		8408-020-023			12	0.49	GC	C-2	GC	C-2 (MUOD)	14	40	12	Vacant	commercial	60% res	built in 1950's
520 W ARROW HWY	91722	8408-020-022			7	0.28	GC	C-2	GC	C-2 (MUOD)	14	40	7	Non-Vacant	commercial	60% res	built in 1950's
1445 N HOLLENBECK	91722	8408-020-020			13	0.56	GC	C-2	GC	C-2 (MUOD)	14	40	13	Non-Vacant	commercial	60% res	built in 1950's
1444 N CITRUS AVE	91722	8406-001-029			34	1.41	GC	C-3A	GC	C-3A (MUOD)	14	40	34	Non-Vacant	commercial	60% res	repurpose
136 E ARROW HWY	91722	8406-001-028			14	0.58	GC	C-3A	GC	C-3A (MUOD)	14	40	14	Non-Vacant	commercial	60% res	repurpose
154 E ARROW HWY	91722	8406-001-034			13	0.55	GC	C-4	GC	C-4 (MUOD)	14	40	13	Non-Vacant	commercial	60% res	repurpose
176 E ARROW HWY	91722	8406-001-037			20	0.83	GC	C-4	GC	C-4 (MUOD)	14	40	20	Non-Vacant	commercial	60% res	repurpose
216 E ARROW HWY	91722	8406-001-021			10	0.42	GC	C-4	GC	C-4 (MUOD)	14	40	10	Non-Vacant	commercial	60% res	repurpose
236 E ARROW HWY	91722	8406-001-018			23	0.94	GC	C-4	GC	C-4 (MUOD)	14	40	23	Non-Vacant	commercial	60% res	repurpose
246 E ARROW HWY	91722	8406-001-042			26	1.1	GC	C-4	GC	C-4 (MUOD)	14	40	26	Non-Vacant	commercial	60% res	repurpose
280 E ARROW HWY	91722	8406-001-044			23	0.94	GC	C-4	GC	C-4 (MUOD)	14	40	23	Non-Vacant	commercial	60% res	repurpose
1430 N RANGER DR	91722	8406-001-045			15	0.63	GC	C-4	GC	C-4 (MUOD)	14	40	15	Non-Vacant	commercial	60% res	repurpose
Totals			323	8	796								1,127				

Appendix C Public Participation Summary

The Housing Element update process provided city residents and other interested stakeholders several opportunities to identify housing needs and review documents. Early in the Housing Element update process a *Frequently Asked Questions* was prepared and posted on the City website (see copy below). Notices of all Housing Element public meetings were published in advance of each meeting, posted on the City website and sent directly to the City’s Housing Element stakeholder list.

Draft Housing Element documents were made available for review at City Hall and posted on the City website. Prior to submittal of the Draft Housing Element to HCD, direct mail notices of availability of the draft Housing Element were sent to all of the persons and organizations listed in Table C-1, which includes housing developers and organizations representing the interests of lower-income persons and special needs groups in Covina.

After receiving comments on the draft Housing Element from the Department of Housing and Community Development and other interested parties, a proposed final Housing Element was prepared and made available for public review prior to public hearings conducted by the Planning Commission and City Council.

The following meetings were conducted to allow opportunities for public involvement in the preparation of this Housing Element update.

Planning Commission/City Council study session	September 21, 2021
Planning Commission hearing	_____
City Council hearing	_____

**Table C-1
Public Notice List**

Southern California Association of Non Profit Housing
501 Shatto Place, Suite 403
Los Angeles, CA 90020

National Community Renaissance
4322 Piedmont Drive
San Diego, CA 92107

LINC Housing Corporation
110 Pine Ave., Suite 500
Long Beach, CA 90802

Mercy Housing
1500 South Grand Ave., Suite 100
Los Angeles, California 90015

City Ventures
2850 Red Hill Avenue, Suite 200
Santa Ana, CA 92705

Jamboree Housing Corp.
17701 Cowan Avenue, Suite 200
Irvine, CA 92614

The Related Companies of California
18201 Von Karman Ave Ste 900
Irvine, CA 92612

Abode Communities
701 East 3rd Street, Suite 400
Los Angeles, California 90013

Meta Housing
1640 S Sepulveda Blvd.
Los Angeles, CA 90025

SOCAL Housing Development Corp
9065 Haven Ave
Rancho Cucamonga, CA 91730

Los Angeles County Dev. Authority
700 West Main Street
Alhambra, CA 91801

LA County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

City of Irwindale
Community Development Director
5050 N. Irwindale Avenue
Irwindale, CA 91706

- City of Azusa
- Community Development Director
- 213 E. Foothill Blvd.
- Azusa, CA 91702
-

City of West Covina
Community Development Director
1444 West Garvey Ave South
West Covina, CA 91790

Gabrieleno Band of Mission Indians - Kizh Nation
Andrew Salas
P.O. Box 393
Covina, CA 91723

- City of San Dimas
- Community Development Director
- 245 East Bonita Avenue
- San Dimas, CA 91773
-

- City of Glendora
- Community Development Director
- 116 E. Foothill Blvd.
- Glendora, CA 91741
-

Azusa Unified School District
546 S Citrus Ave
Azusa, CA 91702

Covina Valley Unified School District
519 E. Badillo St.
Covina, CA 91723

Charter Oak Unified School District
20240 E. Cienega Avenue
Covina, CA 91724

Suburban Water
2235 E. Garvey Avenue North, Suite A
West Covina, CA 91791

Valencia Heights Water District
3009 E Virginia Ave
West Covina, CA 91791

City of Glendora Water
1051 Sierra Madre Ave
Glendora, CA 91741

City of Azusa Water
P.O. Box 9500
Azusa, CA 91702

Golden State Water
115 - 121 Exchange Place
San Dimas, CA 91773

Los Angeles County LAFCO
80 South Lake Avenue, Suite 870
Pasadena, CA 91101

SCAG
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017



FAQ: Covina 2021 Housing Element

1. What is a Housing Element?

State law¹ requires each city to adopt a comprehensive, long-term General Plan for its physical development. General Plans include several “elements” that address various topics. The Covina General Plan² includes the following elements:

- Land Use
- Circulation
- Housing
- Natural Resources and Open Space
- Noise
- Safety

While most portions of General Plans often have a time horizon of 20-25 years, State law requires that the Housing Element be updated every 8 years. Housing Element planning periods are sometimes referred to as *cycles*. The City is currently preparing an update to the Housing Element for the 2021 to 2029 planning period, which is referred to as the “6th Housing Element cycle” in reference to the six required updates that have occurred since the comprehensive revision to State Housing Element law in 1980.

State law³ 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.

2. What is Housing Element “certification” 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.⁴ 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.

Housing Element certification is important for several reasons:

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

² <https://covinaca.gov/pc/page/general-plan>

³ California Government Code Sec. 65580 *et seq.*

⁴ California Government Code Sec. 65585



FAQ: Covina 2021 Housing Element

- **Local control.** The General Plan and its various elements provide the foundation for the City's land use plans and development 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 General Plan 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"⁵ that the Housing Element complies with State law, which would support the City's legal defense. Recent laws also allow courts to impose fines if a jurisdiction fails to adopt a Housing Element in compliance with State law.⁶
- **Eligibility for grant funds.** Some State grant funds are contingent upon Housing Element certification.

3. 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.** Under State law⁷ all cities are required to plan for additional housing to accommodate population growth and address existing housing problems such as overcrowding and high housing cost. State law recognizes that cities generally do not build housing, since that is typically the role of private and non-profit developers and builders. However, cities are required to adopt policies, 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 #5 below).
- **Housing for Persons with Special Needs.** Under State law⁸ 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
 - ✓ Residential care facilities
 - ✓ Transitional housing
 - ✓ Supportive housing
 - ✓ Emergency shelters and other accommodations for the homeless

⁵ California Government Code Sec. 65589.3.

⁶ AB 101 of 2019

⁷ California Government Code Sec. 65583

⁸ California Government Code Sec. 65583(a)(5)



FAQ: Covina 2021 Housing Element

4. What is “affordable” housing?

By definition, housing is 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)

Affordable housing costs for all jurisdictions in Los Angeles County are determined based on these income categories as shown in Table 2, below.

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

Income Category	Maximum Income	Maximum Affordable Rent	Maximum Affordable Price (est.)
Extremely low	\$35,450	\$886	*
Very low	\$59,100	\$1,478	*
Low	\$94,600	\$2,365	*
Moderate	\$96,000	\$2,400	\$375,000
Above moderate	>\$96,000	>\$2,400	Over \$375,000

Assumptions:

- Based on a family of 4 and 2021 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 provided at the moderate-income level
- Source: Cal. HCD; JHD Planning LLC

5. 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 law⁹ by which housing needs are determined.

Prior to each planning cycle the total new housing need for each region of California 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. Covina is located within the Southern California Association of Governments (“SCAG”) region, which includes Los Angeles, Orange, Riverside, San Bernardino, Imperial

⁹ California Government Code Sec. 65584 et seq.



FAQ: Covina 2021 Housing Element

and Ventura counties. The total housing need for the SCAG region is then distributed to cities and counties by SCAG based upon objectives and criteria established in State law.¹⁰

The total new housing need for the entire SCAG region in the 6th Housing Element cycle was determined by HCD to be 1,341,827 units. Table 3 shows the RHNA allocations for Covina, Los Angeles County, and the entire SCAG region.

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

	Covina	Los Angeles County	SCAG Region
New housing unit allocations 2021-2029	1,910	812,060	1,341,827

Source: SCAG, 2021

The RHNA also distributes total housing need to the income categories described in #4 above based on income characteristics for Los Angeles County as shown in Table 3.

The RHNA distributes each jurisdiction’s total housing need into four income categories (the extremely-low and very-low categories are combined for RHNA purposes). Covina’s 6th cycle RHNA allocation by income category is shown in Table 4. The RHNA allocation is important because the Housing Element must demonstrate that the City’s land use plans and regulations could accommodate the amount of additional housing development assigned through the RHNA process.

Table 4. 6th Cycle RHNA by Income Category – Covina

Very Low	Low	Moderate	Above Moderate	Total
614	268	281	747	1,910

Source: SCAG, 2021

6. 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 of projected growth over the next 8 years while avoiding problems like overcrowding and overpayment. The RHNA is a *planning requirement* based upon 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.¹¹ 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.

¹⁰ California Government Code Sec. 65584(d)

¹¹ California Government Code Sec. 65913.4 (SB 35 of 2017)



FAQ: Covina 2021 Housing Element

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

The Housing Element must analyze the city’s capacity for additional housing based on an evaluation of land use patterns, development regulations, other 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 city 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.

8. Why are cities in high-cost areas expected to have affordable housing? Low-cost housing is not economically feasible here due to high land values and construction cost.

State housing laws are based on the premise that every city has an obligation to accommodate a range of housing types for persons at all income levels. Every community is dependent on a variety of workers at all income levels, including low-wage jobs such as landscaping, building maintenance, child and elder care, medical technicians, personal services, clerical support and retail trade. While the existing housing stock serves the needs of many residents, market rents and prices are higher than some families can afford. In addition, low-wage jobs are increasing at a much faster rate than affordable housing is being built.

While cities are not required to build new housing, they must ensure that their land use regulations encourage a full range of housing types. Rental apartments typically provide most affordable housing, but other types of housing such as ADUs can also help to address this need. Various governmental programs provide funding assistance for affordable housing, but if a city’s development regulations are too rigid, affordable housing may be infeasible and the housing needs of the local workforce will be shifted to other cities.

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