

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.

Effectiveness in Meeting Special Housing Needs

During the prior planning period the City has taken the following specific, significant steps to address the housing needs of lower-income households and special needs populations.

- The Covina Housing Authority owns and operates a 7-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. The Housing Authority also subsidizes two transitional housing units in a local residence for victims of domestic violence with income not to exceed 80 percent AMI. 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.
- 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.
- 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, which was completed in 2018. This Plan assessed available resources to address the homeless challenge; identified opportunities for Covina to collaborate with the County of Los Angeles and neighboring cities on initiatives to address homelessness; and established goals and supporting strategies.
- In 2020 the City adopted an Emergency Shelter Overlay Zone ordinance establishing procedures and development standards for by-right approval of emergency shelters and navigation centers.
- Navigation Center – In June 2022, the City Council authorized the City Manager to execute a property lease agreement with Covina Housing Authority for two parcels located at 534 North Barranca Avenue and 601

block of East San Bernardino Road (APN: 8429-009-900 and 8429-009-024), and for the future navigation center.

- The City's General Plan and zoning regulations provide for a variety of housing types at densities up to 50 dwelling units per acre, and higher densities can be achieved through density bonus provisions. The Town Center Specific Plan allows stand-alone multi-family development at up to 40 dwelling units per acre and mixed-use development at up to 50 dwelling units per acre. These standards encourage and facilitate the production of affordable housing. Moreover, the City has taken affirmative steps to remove barriers to housing construction by amending the RD multi-family regulations (Municipal Code Chapter 17.28) to establish clear objective standards for multi-family housing and provide more development certainty.
- In 2020 the City began work on preparing a Mixed-Use Overlay District ("MUOD"), which will allow development of residential uses in areas that are currently zoned for industrial or commercial uses. This overlay district will provide even more opportunities for residential development in areas that previously did not allow residential uses, and encourage the recycling of properties that are distressed.

**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 and the capacity to accommodate the RHNA for the 2021-2029 planning period.

Regional Housing Needs Assessment

As noted in Chapter II, 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

State law requires that the City prepare an inventory of potential sites suitable for housing development and demonstrate that the sites provide adequate capacity to accommodate the RHNA allocation. If existing capacity is insufficient to accommodate the RHNA, sites must be rezoned to accommodate 100% of the shortfall subject to specific requirements.¹ However, HCD recommends that cities “overzone” to provide at least 20% more capacity than the RHNA to compensate for urban land left vacant due to ownership and development constraints and create a real surplus and prevent land shortages from bidding up land costs.² Therefore, the City’s objective is to ensure that realistic housing capacity exceeds the assigned RHNA by a margin of at least 20%. The following analysis demonstrates how this objective is achieved.

Sites Inventory Summary

The City’s inventory of sites to accommodate the RHNA is summarized in **Table B-1** and is comprised of the following components:

- Approved and pending projects expected to be built during the RHNA period (**Table B-2**)
- Underutilized sites in the Town Center Specific Plan (**Table B-3**)
- Underutilized sites in the Affordable Housing Mixed Use Overlay District (**Table B-4**)
- Potential accessory dwelling units (ADUs)

As seen in **Table B-1**, there is surplus capacity of 133 very-low-income units (+22%), 131 low-income units (+49%), 68 moderate-income units (+24%) and 113 above-moderate-income units (+15%) as compared to the RHNA allocation, with a total surplus capacity of 23%, which substantially exceeds HCD’s recommendation of 20% surplus capacity.

¹ California Government Code §65583.2(h)

² HCD Sites Inventory Guidebook, May 2020, p. 37 (https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf)

**Table B-1
Sites Inventory Summary**

	Income Category				
	VL	Low	Mod	Above Mod	Total
Approved and Pending Projects (Table B-2)	-	-	-	677	677
Town Center Specific Plan (Table B-3)	30	-	221	9	260
Affordable Housing Mixed Use Overlay District (Table B-4)	653	280	123	95	1,150
Potential ADUs	64	119	5	79	267
Totals	747	399	349	860	2,354
RHNA 2021 - 2029	614	268	281	747	1,910
Surplus Capacity vs. RHNA	+133 (+22%)	+131 (+49%)	+68 (+24%)	+113 (+15%)	+444 (+23%)

Source: City of Covina, 2023

Methodology for Site Income Category

Based on the “default density” provisions of State law³, 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.

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 projects include both for-sale and rental units and are conservatively assigned to the above-moderate income category. All of these projects are on non-vacant sites and many include consolidation of two or more adjacent parcels. The majority of these projects are located in zones allowing 100% commercial or mixed-use development. The average density of projects in the mixed-use zones is 28.5 units/acre and the actual project densities represent 90% of the maximum allowable density. Since the most recent amendment to the Town Center Specific Plan (TCSP) in 2020, all projects in areas of the TCSP where mixed-use is allowed (but not required) have included a residential component. This trend is similar to other cities in the San Gabriel Valley market area and demonstrates the strong demand for residential development in zones where both commercial and residential use is allowed.

This recent development history provides important guidance for evaluating the likelihood of additional residential development in the planning period. Pursuant to State law and HCD guidance, cities must analyze the extent to which existing uses impede additional development on non-vacant sites, and as an older city, there is almost no vacant land in Covina.

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

As noted in **Table B-2**, the previous uses on non-vacant have been analyzed to identify characteristics that indicate likelihood of residential development. Analysis of these recent projects shows that common characteristics include the following:

1. Structures 40 years old or more.
2. Structures/site improvements that were poorly maintained, pursuant to City standards.
3. Existing non-residential uses in decline due to changing commercial real estate market conditions.
4. Non-conforming uses compared to current zoning requirements.
5. Property considered to be underutilized, such as an existing Improvements-to-Land (I/L) assessed value ratio of less than 1.0 or a floor area ratio (FAR) lower than 0.4.
6. Property owner development interest.
7. Potential for lot consolidation with adjacent properties, especially when under common ownership.
8. Buildings that are vacant or property without significant structures/site improvements, or with a marginal economic use.

Based on observations of recent development patterns in Covina as well as other cities in the San Gabriel Valley market area, these characteristics are considered to provide reliable indications of development potential during the planning period.

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

Address	APN	Parcel Size (ac)	Project Type	Status	Zoning	Max Density	Project Density	Units					Notes	Previous Use and Criteria
								VL	Low	Mod	Above	Total		
137 W. San Bernardino Rd & 141 W. Geneva Pl	8431-014-008 8431-014-015 8431-015-042	5.3	Mixed use (townhouse + stacked flats)	SPR/TTM Approved 6/16/2020	TCSP - Mixed Use	40	30.4 (76%)				161	161	4-story mixed-use project with 15,000 sf commercial on 5.3 acres. Merger of 3 lots.	Former Clippinger Chevrolet; 1-story commercial; over 40 years old ((1, 4, 6, 7))
129-137 W. Orange Street	8431-028-030 & 031	0.28	Townhouse	SPR/TTM Approved 4/17/2018	TCSP - TOD/HD R	25	27 (108%)				8	8	Under construction Merger of 2 lots	2 s.f. houses demolished in 2000 (2, 5, 6, 7)
155 E. San Bernardino Road	8430-024-012	0.51	Mixed use (stacked flats)	SPR/TTM Approved 6/5/2019	TCSP – F.A.I.R.	25	20 (80%)				10	10	A 3-story vertical mixed use with 10 units and 2,330 square feet commercial space on ground floor.	Used as a parking lot (2, 5, 6)
546 N. Lark Ellen Ave	8434-004-003	0.38	Townhouse	SPR Approved 10/8/2019	RD-2000	21.8	15.8 (72%)				6	6	Site is 0.38 acres. In plan check.	Church built in 1950s (1, 2, 3, 4, 6)
1060 W. San Bernardino Rd & 1013, 1085 & 1111 W. Badillo	8434-017-007/008/009 8434-018-020/021	4.54	Mixed use	SPR/TTM Approved 3/21/2021	CBSP-2	30	29 (97%)				132	132	Site is 4.54 acres (merger of 5 lots). A horizontal mixed-use project with 12,000 sf commercial and office space. Under construction.	Historic preservation / reuse of a bowling facility; day care; and church (1, 2, 3, 5, 6, 7, 8)
707 N. Barranca	8430-015-018	5.9	Townhouse	SPR/TTM Approved 6/15/2021	TCSP - TOD/HD R	40	25.6 (64%)				151	151	Site is 5.9 acres. Under Construction	Industrial bldgs. (1, 2, 5, 5, 6, 7, 8)
1201 W. Badillo Street	8434-017-021 8434-017-022 8434-016-019 8434-016-020	1.27	Apartment	SPR	RD-1500	29	22 (76%)				28	28	Site is 1.27 acres. Merger of 4 lots. Approved 2022.	10 residential units built in 1955-56 (1, 2, 6, 7)
155 E. Covina	8406-019-097	1.46	Townhouse	SPR/TTM Approved 1/18/2022	CFSP	30	26 (87%)				38	38	1.46 acres.	Parking lot of former K-Mart (1, 2, 3, 4, 5, 6, 7, 8)

Address	APN	Parcel Size (ac)	Project Type	Status	Zoning	Max Density	Project Density	Units					Notes	Previous Use and Criteria
								VL	Low	Mod	Above	Total		
2003 E. Cienega	8401-014-010 8401-014-017 8401-014-018	2.4	Single-family detached	TTM	RD 2000 and RD 3000	21.8	10.4 (48%)				25	25	Site is 2.4 acres. Merger of 3 lots. In process.	1 parcel is a church, 2 parcels contained s.f. house. (1, 2, 3, 5, 6, 7, 8)
2040 E. Cienega	8401-018-127	0.62	Townhouse	Pre APP	RD 2000	21.8	22 (100%)				12	12	Site is 0.62 acres. In process.	1 s.f. house built in 1920s (1, 2, 5, 6)
316 S. Barranca	8446-012-004	0.44	Townhouse	SPR Approved 8/24/2021	RD 3000	14.5	13.6 (94%)				6	6	Site is 0.44 acres. In plan check	1 main house and 2 residential structures (total 3 units) (1, 6, 7)
747 N. Barranca	8430-015-019	2.79	Apartment	Pre APP	TCSP-TOD/HDR	40	39.4 (99%)				80	80	Site is 2.79 acres. In process.	Vacant industrial (1, 2, 3, 4, 5, 6, 7)
123 E. Center	8445-010-020	0.40	Apartment	CUP 22-06 SPR 22-214 Approved 12/13/2022	TCSP-MU	45	45 (100%)				17	17	Applicant used the density of TOD/HDR zone that increased the range from 25 to 45 units per acre via a CUP (incentive). In plan check.	Parking lot (2, 5, 6)
244 E. College	8445-008-003	0.24	Apartment	SPR 21-120 Approved 3/14/23	TCSP-CC	14	14 (100%)				3	3	Another example of reuse parking lot for residential	Parking lot (2, 5, 6)
Totals								-	-	-	677	677		

Source: City of Covina, 5/2023

Underutilized Sites

As in many 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 redevelopment of properties where the previous use has become economically obsolete.

As discussed above and in **Table B-2**, several examples of such redevelopment have been approved in Covina recently. 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 and in the Mixed Use Overlay District (MOUD) and Affordable Housing Mixed Use Overlay District (AHMUOD) that were adopted in 2022. Allowable densities of up to 50 units/acre are permitted in the TCSP depending on location and project type, and up to 40 units/acre in the MUOD and AHMUOD. Analysis of the estimated realistic capacity for additional housing development in each of these areas is described below.

Town Center Specific Plan

In recognition of changing market conditions and the increasing demand for residential development near employment opportunities and high-quality transit, in 2020 the City adopted significant changes to the Town Center Specific Plan (TCSP). The TCSP covers an area of approximately 226 acres adjacent to the Covina Metrolink station (see Chapter V - Constraints for additional discussion of the TCSP).



A notable example of recent redevelopment in the TCSP is a 161-unit, 4-story mixed-use project with 15,000 square feet of commercial space on approximately 5.3 acres.

This project included the merger of 3 separate parcels on the site of the former Clippinger Chevrolet auto dealership. This project is a short walk from the Covina Metrolink Station.

The project includes a 4-story building at the corner of San

Bernardino and Citrus with ground floor commercial space and 3 levels of stacked flats above. The interior of the site includes 3-story townhouses. In recognition of the site's history as a Chevrolet dealership, all of the internal street names were chosen from vintage Chevrolet models from the era.



Another recent example of a mixed-use redevelopment project on a non-vacant site is the adaptive reuse of the Covina Bowl property and adjacent parcels. This project included the merger of 5 lots into a 4.5-acre unified building site that includes 132 homes and 12,000 square feet of commercial space.



Completed in 1956, Covina Bowl was designed by the architectural firm Powers, Daly, and DeRosa, widely recognized as the masters of the form. Between 1955 and 1962, the firm designed nearly 50 bowling alleys in California, creating destinations that were far more than just a few lanes: they included restaurants, cocktail lounges, banquet rooms, and lavish decorations to attract a clientele far beyond the members of the local bowling league.

Underutilized (non-vacant) sites in the Town Center Specific Plan area with realistic potential for residential development during the planning period are listed in **Table B-3**. All of these sites have General Plan and zoning designations that allow multi-family or mixed-use development.

The realistic capacity of underutilized TCSP sites has been conservatively estimated below the maximum allowable density based on recent development trends in the same zones. As shown in **Table B-2**, recent housing projects in the TCSP have achieved an overall average of 85% of the maximum allowable density. The average density of projects in zones allowing commercial or mixed-use development has been 27.6 units/acre and the average density of projects in zones with a maximum density of 40 units/acre or more has been 30.6 units/acre. No projects in zones allowing both residential and commercial use have been proposed recently without a residential component. Based on these recent trends, the sites inventory conservatively assumes a realistic density of only 75% of the allowable density. With available density bonuses, projects that include affordable units could achieve substantially higher densities than these conservative estimated capacities.

The TCSP also incentivizes the consolidation of small parcels by allowing increased density when a project site is at least 0.5 acre. As shown in **Table B-2**, many recent housing developments have merged two or more adjacent lots into a single building site, which demonstrates the City's success in facilitating lot consolidation. However, consistent with HCD guidelines no parcels smaller than ½ acre have been assigned to the lower-income categories even when they could be consolidated with adjacent parcels into a single building site.

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

In identifying non-vacant sites to satisfy lower-income RHNA requirements, the City considered the following site criteria that indicate a likelihood for redevelopment based on the analysis of recent approved developments as discussed above. All of the non-vacant TCSP sites listed in **Table B-3** have two or more of the following factors that indicate high potential for residential development during the planning period:

1. Structures 40 years old or more.
2. Structures/site improvements that were poorly maintained, pursuant to City standards.
3. Existing non-residential uses in decline due to changing commercial real estate market conditions.
4. Non-conforming uses compared to current zoning requirements.
5. Property considered to be underutilized, such as an existing Improvements-to-Land (I/L) assessed value ratio of less than 1.0 or a floor area ratio (FAR) lower than 0.4.
6. Property owner development interest.
7. Potential for lot consolidation with adjacent properties, especially when under common ownership.
8. Buildings that are vacant or property without significant structures/site improvements, or with a marginal economic use.

All of the TCSP projects listed in **Table B-2** have three or more of these characteristics, which supports the City's findings that the underutilized sites listed in **Table B-3** are suitable for redevelopment and existing uses on non-vacant sites do not impede redevelopment during the planning period. The locations of TCSP sites are shown in **Figure B-1**.

Mixed Use Overlay Districts

As discussed above, the TCSP has been very successful in facilitating new residential development on sites that were previously occupied by non-residential uses. To build on this success and create additional opportunities for housing development and community revitalization, two new mixed-use overlay zoning districts were established in 2022 – the Affordable Housing Mixed Use Overlay District (AHMUOD) and the Mixed Use Overlay District (MUOD).

These districts significantly expand the City's capacity for new housing by allowing residential development in areas where only non-residential uses were previously allowed. The base zoning districts where new mixed-use opportunities have been created include the following:

C-2 (Neighborhood Shopping Center)
C-3 (Central Business)
C-3A (Regional or Community Shopping Center)
C-4 (Commercial-Highway)
C-5 (Specified Highway)
C-P (Administrative and Professional Office)
M-1 (Light Manufacturing)
TC-C (Medical and Professional Office)

Locations of the AHMUOD and MUOD parcels are shown in **Figure B-2**.

Affordable Housing Mixed Use Overlay District (AHMUOD)

The AHMUOD includes sites totaling approximately 37 acres (**Table B-4**). The AHMUOD is similar to the MUOD except that stand-alone residential projects are allowed in addition to horizontal or vertical mixed-use projects. A minimum density of 22 units/acre is required, at least 10% of units must be deed-restricted for lower-income households, and projects that provide at least 20% of units for lower-income households are eligible for ministerial (by-right) approval. Mixed-use developments must include at least 50% residential floor area. The allowable density is 22-40 units/acre. This density may be exceeded consistent with State density bonus law.

The height limit in the AHMUOD is 50 feet, which can accommodate 4-story structures. Non-residential floor area is not included in the allowable density calculation. Other objective standards for mixed-use projects include building orientation, private outdoor patios/terraces, location and screening of parking areas, landscaping, architectural features and amenities. Required off-street parking for the residential component of a mixed-use projects units is based on applicable multi-family parking standards and may be reduced based on shared parking with a project's commercial uses.

Since the adoption of the AHMUOD zoning amendment in late 2022 the City has already received inquiries of development interest from property owners.

AHMUOD parcels of at least ½ acre are assigned to the lower-income categories while smaller parcels are assigned to the moderate-income category even if they are adjacent to other sites with potential for lot consolidation.

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

In identifying non-vacant AHMUOD sites to satisfy lower-income RHNA requirements, the City considered the following site criteria that indicate a likelihood for development. As discussed above, all of the recent developments on non-vacant sites (**Table B-2**) have three or more of the following factors that indicate a likelihood of residential development during the planning period:

1. Structures 40 years old or more.
2. Structures/site improvements that were poorly maintained, pursuant to City standards.
3. Existing non-residential uses in decline due to changing commercial real estate market conditions.
4. Non-conforming uses compared to current zoning requirements.
5. Property considered to be underutilized, such as an existing Improvements-to-Land (I/L) assessed value ratio of less than 1.0 or a floor area ratio (FAR) lower than 0.4.
6. Property owner development interest.
7. Potential for lot consolidation with adjacent properties, especially when under common ownership.
8. Buildings that are vacant or property without significant structures/site improvements, or with a marginal economic use.

All of the AHMUOD sites listed in **Table B-4** satisfy the requirements of Government Code 65583.2(h) and have three or more of these characteristics supporting the City's findings that existing uses do not impede residential redevelopment during the planning period.

Mixed Use Overlay District (MUOD)

The MUOD encompasses approximately 85 parcels totaling about 38 acres (**Table B-5**). MUOD parcels were selected based on suitability for residential redevelopment including parcels with older buildings at least 40 years old that are at least 20,000 square feet in size, and are not located on major commercial corridors.

MUOD regulations allow residential units in either horizontal or vertical mixed-use development. The allowable density is 22-40 units/acre for parcels that are at least one acre in size and 14-22 units/acre for parcels smaller than one acre. This distinction is intended to incentivize the consolidation of small parcels into larger building sites that enhance development feasibility. Non-residential floor area is not included in the allowable density calculation. The height limit for mixed use projects is 50 feet, which can accommodate 4-story structures. Other objective standards for mixed-use projects include building orientation, private outdoor patios/terraces, location and screening of parking areas, landscaping, architectural features and amenities. Required off-street parking for the residential component of a mixed-use projects units is based on applicable multi-family parking standards but may be reduced based on shared parking with a project's commercial uses.

Although the allowable MUOD density for larger parcels exceeds the default density of 30 units/acre and the City has already received a preliminary application to convert an existing office building to a mix of office and housing units, no MUOD parcels have been included in the inventory (**Table B-5**) since surplus capacity has been identified in TCSP and AHMUOD parcels. MUOD parcels significantly increase this surplus capacity. Small Sites

Pursuant to State law, sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of

equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence demonstrating the suitability of smaller sites to accommodate housing for lower-income households. For sites expected to be aggregated, the element must describe circumstances leading to consolidation, such as common ownership, the City's role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, specific examples of projects that were built for lower-income households on similarly sized sites, densities and affordability and relate those examples back to the sites inventory.

As previously noted, the City has been successful in facilitating the consolidation of small parcels into larger building sites. Many of the recent projects listed in **Table B-2** included the consolidation of multiple parcels. In addition, the Town Center Specific Plan regulations incentivize lot consolidation by allowing increased densities for building sites of at least 0.5 acre. No parcels smaller than 0.5 acre have been included in the sites inventory to accommodate lower-income housing requirements.

Sites Listed in a Prior Housing Element Cycle

Pursuant to Government Code Sec. 65583.2(c), a non-vacant 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). None of the sites listed in **Table B-3** or **Table B-4** that were identified in a prior planning period have been identified to satisfy lower-income RHNA requirements in the current planning period.

Availability of Infrastructure

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

Potential Environmental Constraints

There are no environmental constraints that would preclude development of sites listed in **Table B-3 and Table B-4** 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.

The City has made efforts to minimize the additional time and cost of CEQA compliance by adopting programmatic CEQA documentation for the Town Center Specific Plan and the Mixed Use Overlay Districts where most new housing development is likely to occur.

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 California⁴ 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:

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

Source: SCAG 2020

ADU permits during the 2018-2021 period in Covina were as follows:

2020: 23
 2021: 25
 2022: 49

Based on this trend and SCAG’s analysis, it is conservatively assumed that an average of 32 ADUs per year (267 total ADUs) will be produced in the following income categories during the 2021-2029 planning period. As discussed in Program 2.3 of the Housing Plan, the City will encourage ADU production in a variety of ways such as publication of an ADU Guidebook in multiple languages on the City’s website and in newsletters, email distribution lists, social media, and the cable television channel. City staff also provides assistance to residents and applicants in preparing ADU applications and clarifying requirements.

Very Low	Low	Moderate	Above Moderate
64	119	5	79

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 (**Tables B-3 and B-4**), and potential accessory dwelling units (ADUs).

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 and the Affordable Housing Mixed Use Overlay District areas, which provide 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. In

⁴ https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527

addition, recent City zoning amendments in conformance with SB 9 allow new housing opportunities in single-family zones through urban lot splits. Through these strategies, affordable housing choices for protected classes are expanded in all residential and mixed-use areas of Covina. Additional analysis of how the sites inventory furthers AFFH objectives is provided in Appendix D.

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-3
Town Center Specific Plan Underutilized Sites**

Assessor Parcel Number	Address	Consolidated Sites	Zoning	Max Density (du/ac)	Parcel Size (Acres)	Existing Use/Vacancy	Lower	Mod	Above Mod	Total	I/L Ratio	Year Built	Site Criteria
8445-019-008	120 E Center	A	Resi.Town Center East	14	0.16	1 residential; developer interest			1	1	0.29	1901	1, 2, 7
8445-019-009	116 E Center	A	Resi.Town Center East	14	0.16	1 residential; developer interest			1	1	1.50	1910	1, 2, 7
8431-013-013	619 N Citrus Ave	B	F.A.I.R.	15	0.35	packing house; Unoccupied; poorly maintained			4	4	0.00	1927	1, 2, 4, 6, 7
8431-013-015	621 N Citrus Ave	B	F.A.I.R.	25	1.43	outdoor storage Unoccupied; poorly maintained		27		27	0.55	1994	2, 4, 5, 7
8444-008-005	136 W Center St		Mixed-use	25	0.24	vacant		5		5	0.00	na	2, 5, 6, 8
8445-010-009	160-176 E Badillo St	C	Mixed-use	25	0.39	parking lot; same owner, for sale		7		7	0.31	1967	1, 3, 6, 7
8445-010-812	160-176 E Badillo St	C	Mixed-Use	25	0.1	GTE parking lot; same owner, for sale		2		2	0.00	na	1, 3, 6, 7
8445-010-810	160-176 E Badillo St	C	Mixed-use	40	1.01	GTE parking lot; same owner, for sale	30			30	0.00	na	1, 3, 6, 7
8430-015-020	633 N. Barranca		F.A.I.R.	25	2.57	older industrial bldg.; nonconforming		48		48	0.40	1947	1, 3, 4, 6
8430-018-014	251 E Front St		F.A.I.R.	25	1.87	older industrial bldg.; nonconforming; dev. interest		35		35	0.69	1961-66	1, 2, 3, 4, 6
8430-018-020	251 E Front St		F.A.I.R.	15	0.07	outdoor storage; Same owner as 251 E Front St			1	1	0.00		1, 2, 3, 4, 6
8430-019-010	359 E Front St		F.A.I.R.	25	0.89	nonconforming auto repair		17		17	0.14	1947-77	1, 2, 3, 4, 5, 7
8430-020-012	358 E Front St	D	F.A.I.R.	15	0.16	1 older residential; poorly maintained; same owner			1	1	0.18	1951	1, 2, 5, 7
8430-020-030	359 E San Bernardino	D	F.A.I.R.	15	0.21	unoccupied car lot, poorly maintained; same owner			2	2	0.02	1964	1, 2, 3, 4, 5, 7
8430-022-008	511 N First Ave	E	F.A.I.R.	15	0.1	Storage; same owner			1	1	0.86	1946	1, 2, 7
8430-022-007	511 N First Ave	E	F.A.I.R.	15	0.09	1 older residential; same owner			0	0	0.63	1965	1, 2, 7
8430-022-006	515 N First Ave	E	F.A.I.R.	15	0.09	1 older residential; same owner			0	0	0.35	1910	1, 2, 7
8430-022-005	521 N First Ave	E	F.A.I.R.	15	0.09	1 older residential; same owner			0	0	0.23	1905	1, 2, 7
8430-022-004	525 N First Ave	E	F.A.I.R.	15	0.17	1 older residential; same owner			1	1	0.55	1905	1, 2, 7
8430-022-017	510 N Howard Ave	F	F.A.I.R.	15	0.16	1 older residential			1	1	0.18	1905	1, 2, 7
8430-022-016	520 N Howard Ave	F	F.A.I.R.	15	0.16	2 older residential			0	0	0.39	1900	1, 2, 7
8430-022-015	524 N Howard Ave	F	F.A.I.R.	15	0.16	1 older residential			1	1	0.43	1910	1, 2, 7
8430-023-012	528 N Howard Ave	F	F.A.I.R.	15	0.11	1 older residential			0	0	6.71	1905	1, 2, 7
8430-023-012	518 N Second Ave	G	F.A.I.R.	15	0.05	nonconforming auto repair; same owner			1	1	6.71	1948-79	1, 2, 3, 4, 7
8430-023-013	518 N Second Ave	G	F.A.I.R.	15	0.05	nonconforming auto repair; same owner			1	1	0.09	1954	1, 2, 3, 4, 7
8430-023-014	518 N Second Ave	G	F.A.I.R.	15	0.05	nonconforming auto repair; same owner			1	1	0.09	1954	1, 2, 3, 4, 7
8430-025-018	129 E San Bernardino		F.A.I.R.	25	0.54	unoccupied industrial		10		10	0.82	1964	
8431-029-006	126 W Orange St	J	Neighborhood	14	0.1	parking lot			1	1	0.00	na	5, 7, 8
8431-029-007	132 W Orange St	J	Neighborhood	14	0.1	parking lot			1	1	0.00	na	5, 7, 8
8431-014-019	579 N Citrus	K	Mixed-use	25	0.39	nonconforming auto repair		7		7	3.50	1978	3, 4, 7
8431-014-020	569 N Citrus	K	Mixed-use	25	0.26	nonconforming auto repair		5		5	1.15	1972	3, 4, 7
8431-015-005	201 W San Bernardino	L	Mixed-use	25	0.18	used car lot (5 adjacent lots)		3		3	0.12	1966	4, 5, 7
8431-015-038	209 W San Bernardino	L	Mixed-use	25	0.13	auto repair (5 adjacent lots)		2		2	0.88	1986	4, 5, 7
8431-015-039	217 W San Bernardino	L	Mixed-use	25	0.21	1 story office (5 adjacent lots)		4		4	0.43	1960	3, 5, 7
8431-015-043	223 W San Bernardino	L	Mixed-use	25	0.29	2-story office (5 adjacent lots)		5		5	1.27	1995	3, 5, 7
8431-015-024	237 W San Bernardino	L	Mixed-use	25	0.27	Vacant (5 adjacent lots)		5		5	0.00	na	5, 7, 8
8430-024-009			F.A.I.R.	25	0.5	plant nursery		9		9	0.68	1921-71	1, 3, 5
TOTALS					13.9		30	192	17	239	0.49		

Notes:

General Plan designation for all sites is Town Center Specific Plan

**Table B-4
Underutilized Sites – Affordable Housing Mixed Use Overlay Zone**

Site Address	APN	Parcel Size	Zoning	Max. Density	Realistic Density	VL	Low	Mod	Above Mod	Total (net)	Existing Uses	I/L Ratio	Year Built	Site Criteria
Area M														
321 N Vincent Ave	8435-033-023	1.78	C-2(AHMUOD)	40	36	45	19			64	Vacant commercial, code violations, deterioration	4.18	1967	1, 2, 3, 5, 7
433 N Vincent Ave	8435-033-017	0.51	C-2(AHMUOD)	40	36	13	6			18	Marginal commercial, code violations, deterioration	1.22	1987	1, 2, 3, 5, 7
333 N Vincent Ave	8435-033-028	1.84	C-2(AHMUOD)	40	36	46	20			66	Commercial, vacancies, code violations, deterioration	3.65	1967	1, 2, 3, 5, 7
No address	8435-033-024	2.76	C-2(AHMUOD)	40	36	70	30			99	Vacant, same owner	0	NA	5, 7, 8
Subtotals		6.89				174	74	0	0	248				
Area K-1														
1123 W San Bernardino	8434-002-011	0.31	C-5(AHMUOD)	40	20			3	3	5	1 older house	0.25	1949	1, 4, 5, 7
1139 W San Bernardino	8434-002-013	0.2	C-5(AHMUOD)	40	20			2	2	3	1 older house	0.36	1950	1, 5, 7
1145 W San Bernardino	8434-002-014	0.18	C-5(AHMUOD)	40	20			2	2	4	office (converted house)	0.16	1950	1, 5, 7
1109 W San Bernardino	8434-002-018	0.43	C-5(AHMUOD)	40	20			4	4	9	office bldg., deterioration	0.7	1950	1, 2, 7
1151 W San Bernardino	8434-002-021	0.18	C-5(AHMUOD)	40	20			1	1	3	1 older house	0.32	1950	1, 4, 7
1131 W San Bernardino	8434-002-024	0.23	C-5(AHMUOD)	40	20			2	2	5	office (converted house)	0.41	1950	1, 5, 7
Subtotals		1.53				0	0	28	0	28				
Area K-2														
1235 W San Bernardino	8434-003-015	0.23	C-5(AHMUOD)	40	20			2	2	4	1 older house	0.63	1951	1, 5, 7
1229 W San Bernardino	8440-003-016	0.2	C-5(AHMUOD)	40	20			2	2	4	Commercial (converted house)	0.28	1951	1, 5, 7
1217 W San Bernardino	8434-003-017	0.2	CP(AHMUOD)	40	20			2	2	4	office bldg	2.1	1986	5, 7, 8
1211 W San Bernardino	8434-003-018	0.18	C-5(AHMUOD)	40	20			1	1	3	1 older house	0.32	1950	1, 2, 4, 5, 7
1205 W San Bernardino	8434-003-019	0.22	C-5(AHMUOD)	40	20			2	2	3	1 older house	1.5	1924	1, 2, 4, 5, 7
1171 W San Bernardino	8434-003-022	0.22	C-2(AHMUOD)	40	20			2	2	4	office bldg	6.08	1980	5, 7, 8
1241 W San Bernardino	8434-003-014	0.04	C-2(AHMUOD)	40	20			0	0	1	vacant	0	NA	
1241 W San Bernardino	8434-004-020	0.42	C-2(AHMUOD)	40	20			4	4	7	store & residence	0.61		1, 2, 4, 5, 7
1247 W San Bernardino	8434-004-023	0.42	C-2(AHMUOD)	40	20			4	4	8	office bldg. (converted house)	0.55	1950	1, 5, 7
1257 W San Bernardino	8434-004-033	0.57	C-4(AHMUOD)	40	36	14	6			21	office bldg., deterioration	0.27	1969	1, 2, 5, 7
Subtotals		2.7				14	6	19	19	59				
Area K-3														
1274 W San Bernardino	8434-016-033	0.51	C-4(AHMUOD)	40	20			5	5	10	car wash, crime	0.49	2003	5, 7, 8
312 N Lark Ellen	8434-016-037	0.08	CP(AHMUOD)	40	20			1	1	2	parking lot	0.05		1, 4, 5, 7
312 N Lark Ellen	8434-016-010	0.17	CP(AHMUOD)	40	20			2	2	3	office bldg. (converted house)	0.91	1955	1, 4, 5, 7
306 N Lark Ellen	8434-016-011	0.17	CP(AHMUOD)	40	20			2	2	3	office bldg. (converted house)	0.86	1954	1, 4, 5, 7
Subtotals		0.93				0	0	9	9	19				
Area J														
440 N Barranca	8429-035-006	0.29	C-4(AHMUOD)	40	20			3	3	6	Older 1-story commercial	0.86	1964	1, 2, 5, 7
430 N Barranca	8429-035-007	0.26	C-4(AHMUOD)	40	20			3	3	5	Older 1-story commercial	0.92	1964	1, 2, 5, 7
426 N Barranca	8429-035-008	0.25	C-4(AHMUOD)	40	20			3	3	5	Older 1-story commercial	0.86	1963	1, 2, 5, 7
412 N Barranca	8429-035-009	0.22	C-4(AHMUOD)	40	20			2	2	4	Older 1-story commercial	0.34	1960	1, 2, 5, 7
520 Rue Royal	8429-035-019	0.16	C-4(AHMUOD)	40	20			2	2	3	Older 1-story auto repair	0.3	1965	1, 5, 7
404 N Barranca	8429-035-018	0.26	C-4(AHMUOD)	40	20			3	3	5	Older 1-story pool repair	1.01	1961	1, 5, 7

Site Address	APN	Parcel Size	Zoning	Max. Density	Realistic Density	VL	Low	Mod	Above Mod	Total (net)	Existing Uses	I/L Ratio	Year Built	Site Criteria
Subtotals		1.44				0	0	14	14	29				
Area G-1														
401 E Rowland	8445-024-021	0.16	CP(AHMUOD)	40	20			2	2	3	office use (converted house)	0.49	1946	1, 5, 7
560 S San Jose	8445-024-009	0.37	CP(AHMUOD)	40	20			3	3	6	1 older house	0.26	1935	1, 5, 7
568 S San Jose	8445-024-010	0.22	CP(AHMUOD)	40	20			2	2	3	1 older house	0.25	1946	1, 5, 7
Subtotals		0.75				0	0	7	7	13				
Area G-2														
361 E Rowland	8445-025-022	0.36	CP(AHMUOD)	40	20			4	4	7	1-story church	2.34	1962	1, 5, 7
361 E Rowland	8445-025-006	0.18	CP(AHMUOD)	40	20			2	2	4	Church parking	0.04		1, 5, 7
373 E Rowland	8445-025-009	0.18	CP(AHMUOD)	40	20			2	2	4	office bldg	2.32	1969	1, 5, 7
571 S San Jose	8445-025-010	0.18	CP(AHMUOD)	40	20			2	2	4	parking lot	0.08		1, 5, 7
563 S San Jose	8445-025-011	0.18	CP(AHMUOD)	40	20			2	2	4	parking lot	0.07		1, 5, 7
Subtotals		1.08				0	0	11	11	22				
Area G-3														
332 E Rowland	8451-007-052	0.16	C-3A(AHMUOD)	40	20			2	2	3	1-story office, deterioration	1.33	1954	1, 5, 7
322 E Rowland	8451-007-053	0.1	C-3A(AHMUOD)	40	20			1	1	2	1-story office, deterioration, same owner	0.48	1954	1, 5, 7
322 E Rowland	8451-007-051	0.1	C-3A(AHMUOD)	40	20			1	1	2	parking lot, same owner	0.03	NA	1, 5, 7
322 E Rowland	8451-007-050	0.1	C-3A(AHMUOD)	40	20			1	1	2	parking lot, same owner	0.03	NA	1, 5, 7
344 E Rowland	8451-007-054	0.38	C-3A(AHMUOD)	40	20			4	4	8	Vacant building (converted house)	0.22	1920	1, 3, 5, 7
354 E Rowland	8451-007-055	0.95	C-3A(AHMUOD)	40	36	24	10			34	Older office bldgs	3.8	1973	1, 5, 7
Subtotals		1.79				24	10	8	8	51				
Area D														
1024 N Citrus	8422-001-008	0.09	C-2(AHMUOD)	40	20			1	1	2	drive aisle		NA	
1024 N Citrus	8422-001-017	0.05	C-2(AHMUOD)	40	20			1	1	1	parking spaces	0	NA	
1024 N Citrus	8422-001-016	3.8	C-2(AHMUOD)	40	36	96	41			137	commercial	0.73	1956	1, 3, 5, 7
1051 N Citrus	8421-026-024	0.35	C-4(AHMUOD)	40	20			4	4	7	Vacant commercial, deterioration	1.25	1921/72	1, 3, 5, 7
1063 N Citrus	8421-026-025	0.36	C-4(AHMUOD)	40	20			4	4	7	Commercial, deterioration, adjacent to newer condos	1.67	1962	1, 2, 3, 5, 7
1085 N Citrus	8421-026-028	0.36	C-2(AHMUOD)	40	20			4	4	7	commercial	1.05	1978	1, 5, 7
900 N Citrus	8422-001-009	2.93	C-2(AHMUOD)	40	36	74	32			105	commercial	1.45	1978	1, 3, 7
902 N Citrus	8422-001-011	0.18	C-2(AHMUOD)	40	20			2	2	4	commercial	1	1978	1, 3, 7
900 N Citrus	8422-001-012	0.42	C-2(AHMUOD)	40	20			4	4	8	restaurant	0.5	1978	1, 3, 7
1088 N Citrus	8422-001-015	0.08	C-2(AHMUOD)	40	20			1	1	2	gas station	0.07	1977	1, 3, 7
1088 N Citrus	8422-001-013	0.32	C-2(AHMUOD)	40	20			3	3	6	gas station	0.11	1977	1, 3, 7
Subtotals		8.94				170	73	22	22	286				
Area A														
176 E Arrow Hwy	8406-001-037	0.83	C-4(AHMUOD)	40	36	21	9			30	commercial	0.78	1972	1, 3, 7
216 E Arrow Hwy	8406-001-021	0.42	C-4(AHMUOD)	40	20			4	4	8	Thrift store	4.6	1976	1, 7
236 E Arrow Hwy	8406-001-018	0.94	C-4(AHMUOD)	40	36	24	10			34	commercial	0.44	1911	1, 4, 5, 7
246 E Arrow Hwy	8406-001-042	1.1	C-4(AHMUOD)	40	36	28	12			40	commercial	0.67	1982	1, 7, 8
280 E Arrow Hwy	8406-001-044	0.94	C-4(AHMUOD)	40	36	24	10			34	self storage	1.32	1974	1, 7, 8
1430 N Ranger Dr	8406-001-045	0.63	C-4(AHMUOD)	40	36	16	7			23	commercial	0.67	1981	1, 7, 8
Subtotals		4.86				112	48	4	4	168				

Site Address	APN	Parcel Size	Zoning	Max. Density	Realistic Density	VL	Low	Mod	Above Mod	Total (net)	Existing Uses	I/L Ratio	Year Built	Site Criteria
Area B						0	0							
412 W Arrow Hwy	8407-032-002	6.33	C-3A(AHMUOD) (PCD)	40	36	160	68			228	Vacant commercial, deterioration	0.07	1960	1, 2, 3, 5, 6
Subtotals		6.33				160	68	0	0	228				
Totals		37.24				653	280	123	95	1,150				

Notes:
General Plan designation is GC for all sites

Figure B-1a
Underutilized Parcels (Town Center Specific Plan)

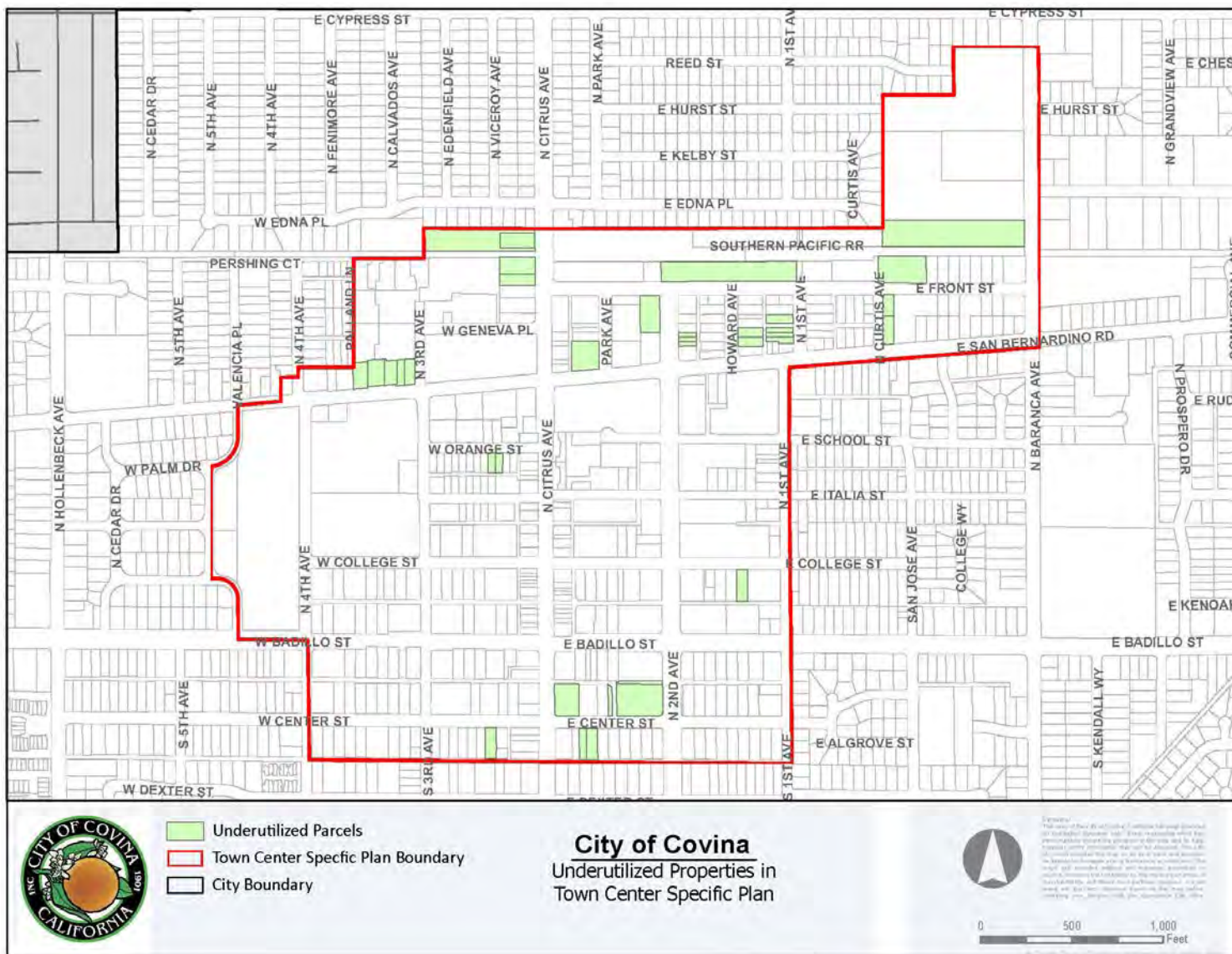
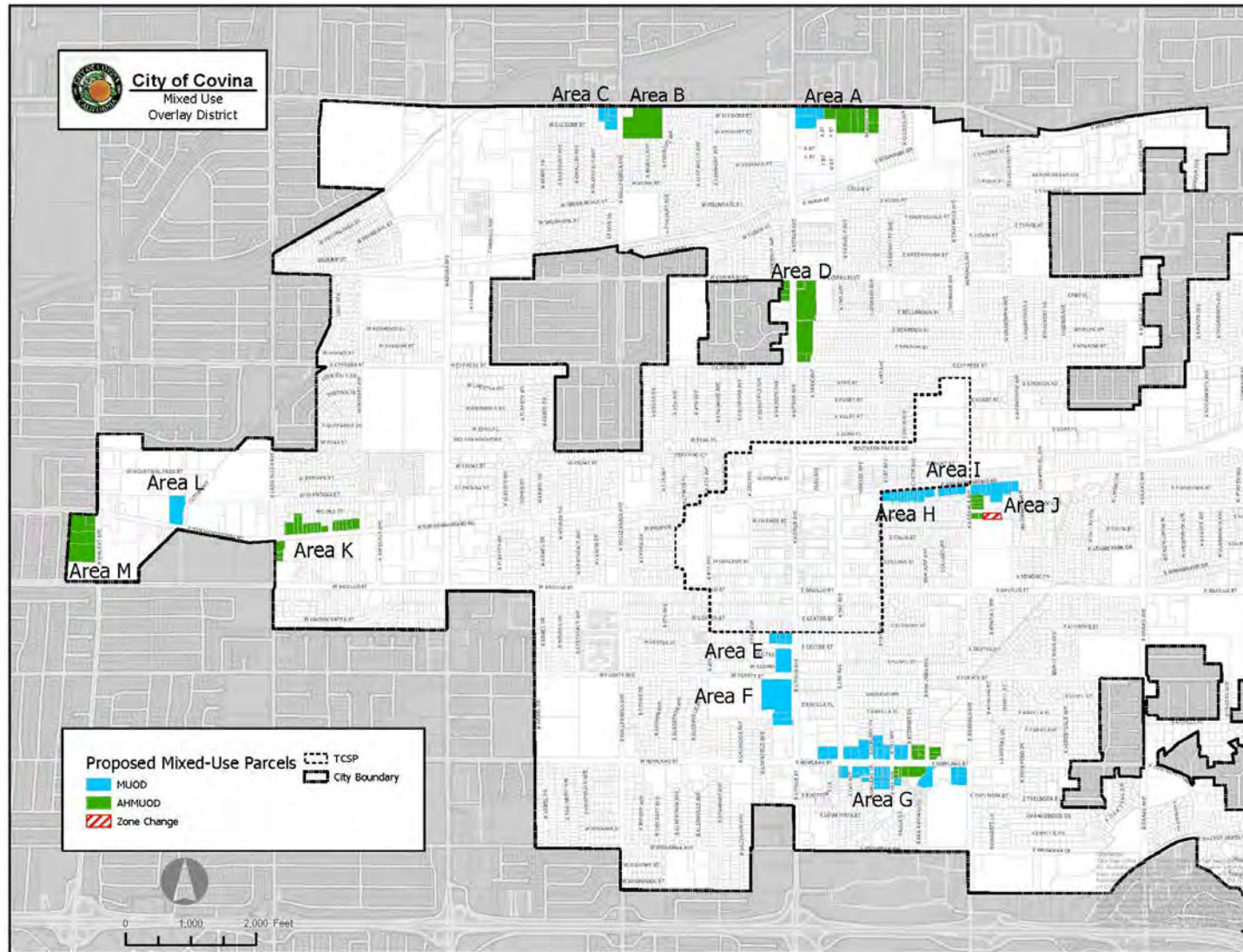


Figure B-1b
Underutilized Parcels (outside Town Center Specific Plan)



Figure B-2
Mixed Use Overlay District Parcels



A

Opportunity Area "A" – East of N. Citrus Avenue and South of E. Arrow Highway and 1430 N Ranger Drive



Figure 1. Area "A" (overall plan view picture)

Summary:

Site Addresses: 176, 216, 236, 246-250, and 280 E. Arrow Highway, and 1430 N. Ranger Drive

APN Numbers: 8406-001-037, 8406-001-021, 8406-001-018, 8406-001-042, 8406-001-044, and 8406-001-045

General Plan Designation: General Commercial

Zoning Classification: C-4 Commercial Zone (Highway) and Affordable Housing Mixed-use Overlay District

Acreage: 4.86 acres

TCAC/HCD Resource Category: High Resource Area

Estimated Housing Potential: 168 units

Qualified Census Tract: No

Description: Opportunity Area "A" comprises six parcels totaling 4.86 acres and is generally located on the south side of E. Arrow Highway and the east side of N. Citrus Avenue. The detailed description of the six parcels is as follows:

176 E. Arrow Hwy. The site is about 0.83 acres in size. The site contains a 4,950 square feet one-story low-profile building located toward the east side of the parcel, built in 1972. Two businesses currently occupy the building: a party rental and a U-Haul truck rental. The remaining site area is a parking lot for outdoor storage of U-Haul trucks and party rental items. The structures are more than 50 years old. The land-to-improvement ratio is less than one (0.78). The site shows building, site, parking, and landscape maintenance deterioration. The site's north side is an existing apartment complex in the City of Azusa. The site's east side is a mini-storage facility and existing auto-related uses. The west side of the site is existing commercial use. The site's south side "is an existing mobile home park and Fairvalley Continuation High School (a trade tech academy) from Covina Unified School District. The photos below illustrate the existing conditions of the site.



Figure 2. Street view of 176 E Arrow Hwy

216 E. Arrow Hwy.

The site is about 0.42 acres in size. The site contains an 18,480-square-foot mini-storage building built in 1976. The structure is over 40 years old. The land-to-improvement ratio is 4.50. The site's north side is an existing apartment complex in the City of Azusa. The site's east side is existing auto repair and related use. The site's west side is existing commercial use. The site's south side is an existing mobile home park and a trade tech academy from Covina Unified School District. The photos below illustrate the existing conditions of the site.



Figure 3. Street view of 216 E Arrow Hwy

236, 246-250 E. Arrow Hwy and 1430 N. Ranger Drive. The site at 236 E. Arrow Hwy is 0.94 acres in size. It contains an existing single-family house and a long, narrow, one-story, low-profile metal structure approximately 35 feet by 240 feet situated behind the house. The City's record shows that the single-family house was built in 1911; however, there is no record of any permits for the long, narrow structure behind the house. A business sign shows Baltasar Construction, Inc., which is a contractor's yard with outdoor storage. The City has no records approving the conversion of the single-family house to a non-residential use. Per Covina Municipal Section (CMC) 17.44.030, the conversion of residential use to non-residential use is subject to a Conditional Use Permit and the development standards set forth under CMC 17.76. Furthermore, a contractor's yard with outdoor storage is not listed as a permitted use or a conditionally permitted use within the underlying zone of the C-4 Commercial Zone (Highway). Therefore, the site is deemed to be a non-conforming use. The land-to-improvement ratio is less than one (0.44). The site shows deterioration in site, building, parking, and landscape maintenance.

The site at 246 to 250 E. Arrow Hwy is 1.1 acre in size. It contains a multi-tenant building developed in 1982 and is occupied by auto-related uses such as minor auto repair and services, muffler, and smog services. The structure is more than 40 years old. The land-to-improvement ratio is less than one (0.67). The site shows deterioration in building, parking, and landscape maintenance.

The site at 1430 N Ranger Drive is 0.63 acres in size. It contains two 4,000-square-foot buildings developed in 1982. The current businesses are auto-related uses such as auto repair and transmission services. The two structures are more than 40 years old. The land-to-improvement ratio is less than one (0.67). The site shows deterioration in building, parking, and landscape maintenance.

Since the three parcels have the same property ownership, Baltasar Construction, Inc., there is a high possibility of lot consolidation for future residential development. Combining the three parcels will yield 2.67 acres.



Figure 4. A closer overhead view of 236 E. Arrow Hwy.



Figure 5. Street view of 236 E. Arrow Hwy



Figure 6. Street view of 246-250 E. Arrow Hwy



Figure 7. Street view of 1430 N. Ranger Drive

280 E. Arrow Hwy. The site is about 0.94 acres in size. The site contains a 14,000-square-foot one-story building built in 1974. The current business occupying the building is a thrift (secondhand) store. Per Covina Municipal Section (CMC) 17.44.030, establishing a thrift store requires a Conditional Use Permit (CUP). The City does not have records of approving a CUP for the thrift store use. Therefore, the site is deemed to be a non-conforming use. The land-to-improvement ratio is 1.32. The parcel shows deterioration in site, building, parking, and landscape maintenance. The structure is more than 40 years old. The site's north side is an existing apartment complex in the City of Azusa. The site's east side is a mini-storage facility and existing auto-related uses. The site's west side is existing commercial use. The site's south side is an existing mobile home park and a trade tech academy (Fair Valley Continuation High School) from Covina Unified School District. The photos below illustrate the existing conditions of Area "A."



Figure 8 Street view of 280 E. Arrow Hwy

In November 2021, the City rezoned Area "A" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to provide flexibility in allowing housing development in the future. Adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" is a "capture value" that increase the land value of the parcel, which leads to housing opportunity. Based on the age of the structures, the declining commercial market conditions because of the increasing demand for E-commerce, and the low land-to-improvement value ratio, Area "A" is ripe for redevelopment. While ownership is unique to each parcel, lot consolidation is expected in Covina for repurposing and redevelopment since the City is built out with no vacant land. Recent examples of lot consolidation are the 52-unit condominium project (Citrus Village) located south of Area "D-1," which was the result of combining two parcels into two acres in 2014 for development, and the Covina Bowl project located at the southwest corner of W. San Bernardino Road and N. Rimsdale Avenue that was the result of combining four parcels for the development of a multi-phased 132 condominium units. Of the six parcels in Area "A," each of the five parcels except the site at 216 E Arrow, have parcel size larger than 0.50 acre. The lot combination of these five parcels yield a total of 4.44 acres. The site at 216 E Arrow has a smaller parcel size of 0.42 acre. Since Area "A" is close to Downtown Covina, Metrolink Commuter Rail Station, and Foothill Transit Bus Station, the City anticipates the site will attract housing development during the 2021-2029 planning period.

Land Use Regulations: The City's General Plan Land Use Map shows that Area "A" is designated General Commercial, and the Zoning classification for Area "A" is C-4 Commercial Zone (Highway). In November 2021, the City of Covina rezoned Area A by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. AHMUOD allows a density of up to 40 dwelling units per acre. Applying the AHMUOD to the parcels will facilitate either a mixed-use project with ground floor commercial space and several stories

above for residential units or 100 percent housing development in meeting the very low, low, moderate, and above-moderate income criteria. The City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "A," and given the recent City's residential development trends, the City assumes that the site can achieve at least 168 new units. Five of the six parcels in Area "A" except the site at 216 E Arrow, have parcel size larger than 0.50 acre for each parcel. The lot combination of these five parcels yield a total of 4.44 acres. The City's 90 percent assumption of the permitted density is equal to 36 dwelling units per acre; therefore, the five parcels can achieve 160 new units for very low and low income criteria. With respect to the site at 216 E Arrow with a smaller parcel size of 0.42 acre, staff assumes a 50 percent of the permitted density, which is 20 dwelling unit per acre in calculating the number of new units. The site at 216 E. Arrow can achieve 8 units for moderate or above moderate income criteria.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "A" are within a High Resource Area (Census Tract 06037405900) for "A" but do not fall within a Qualified Census Tract (QCT). Staff analyzed Area "A" to assess the TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area "A" is well-positioned to have lower and moderate-income residential development because of the proximity to amenities. Area "A" is along E. Arrow Highway, a major transportation corridor serviced by Foothill Transit bus route number 492 that links to the City of Claremont and the City of El Monte Metrolink Rail Stations. Area "A" is close to N. Citrus Avenue, another major transportation corridor serviced by Foothill Transit that provides a link to Covina Metrolink Rail Station, Foothill Transit Bus Station and Park & Ride facility, and City of Azusa Metro Gold-Line Light Rail Station. Area "A" is close to the commercial corridor of Arrow Highway and N. Citrus Avenue, which provides commercial, office, and retail services to residents. Area "A" is within a mile of Emanate Hospital and medical health services. The Cypress Elementary School is within a mile, while the Fairvalley Continuation High School is within walking distance of a quarter mile. Area "A" is within a mile of Cypress Ball Park and Hollenbeck Park.

Opportunity Area "B" – Southwest Corner of W. Arrow Highway and N. Hollenbeck Avenue (412 W. Arrow Highway)



Figure 1. Aerial photo of Area "B".

Summary:

Site Addresses: 412 W. Arrow Highway

APN Numbers: 8407-032-002

General Plan Designation: General Commercial

Zoning Classification: C-3A Commercial Zone (Regional or Community Shopping Center), Planned Community Overlay District (PCD), and Affordable Housing Mixed-Use Overlay District (AHMUOD)

Acreage: 6.33 acres

TCAC/HCD Resource Category: High

Estimated Housing Potential: 228 units

Qualified Census Tract: No

Description: Opportunity Area "B" comprises one parcel, approximately 6.33 acres, and is generally located in the southwest corner of W. Arrow Hwy and N. Hollenbeck Avenue. The site is developed as a commercial center consisting of approximately an 82,500 square foot main building and a 3,200 square foot pad building. The 36,000-square-

foot anchor space of the main building has been vacant for more than five years. A tenant, Harbor Freight retail tool store, occupies about 26,000 square feet of the main building. Half of the remaining 20,600 square feet of commercial space of the main building is vacant. An auto parts retail store occupies the pad building. The City's record shows the site was built in the 1960s, and the structures are over 50 years old. The site improvements, including the parking and landscaped areas, are poorly maintained. The land-to-improvement ratio is low at 0.07. The parcel has been on the "for sale" market for over five years. There had been interest from residential builders to propose a mixed-use project with residential units. The City staff has responded to several inquiries from residential builders regarding the development processing for a mixed-use project. Unfortunately, there was no formal submittal of a mixed-use project to the City. The parcel is still listed for sale on the market. The site's south and east sides are existing single-family use. The site's north side is a commercial center in the City of Azusa. The site's west side is an exciting commercial center for single-family use. Given the declining commercial market conditions with increasing demand for E-commerce and the high tenancy vacant rate, the site is primed to be redeveloped. Area "B" could experience an amenity-rich mixed-use housing development with ground-floor commercial spaces.



Figure 2. Birds Eye View of Opportunity Area "B"



Figure 3. Street View of Opportunity Area "B" on N Hollenbeck Avenue

Land Use Regulations: The City's General Plan Land Use Map shows that Area "B" is designated as General Commercial, and the Zoning classification is C-2 Commercial Zone. In November 2021, the City of Covina rezoned the site by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. Adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" is a "capture value"⁵ that increase the land value of the parcel, which leads to housing opportunity. AHMUOD allows a density of up to 40 dwelling units per acre. Applying the AHMUOD to the parcels will facilitate either a mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development in meeting the very low and low income criteria. Given Area "B" larger parcel size (6.33 acres), the location and transit accessibility, and the density capacity, the City anticipates the site will have high potential for redevelopment and will likely develop with a mixed-use residential project during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "B," and given the recent City's residential development trends, the City assumes that the site can achieve at least 90 percent of the permitted density. The City's 90 percent assumption of the permitted density is equal to a density of up to 36 dwelling units per acre; therefore, Area "B" can realistically accommodate at least 228 new housing units. The density of 36 dwelling units per acre is considered appropriate in accommodating the development of housing units for very low and low income households. The number of units for Area "B" will be distributed across the very low and low income groups in line with the City's RHNA allocation percentages.

⁵ Kosmont Companies, "Shaping the Future:Key Trends in Real Estate, Finance, and Economic Development." 11/7/2023

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "B" are within a High Resource Area (Census Tract 06037405800) but do not fall within a Qualified Census Tract (QCT). Area "B" was analyzed to assess TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area "B" is well positioned to have lower and moderate-income residential development because of the site's size and the proximity to amenities. Area "B" is within half a mile of Cypress Elementary School, a mile from Gladstone High School, and half a mile from a major commercial center, Covina Town Square Shopping Center. Area "B" fronts onto W. Arrow Highway and is served by Foothill Transit primary bus route number 492 that heads to Baldwin Park Metrolink Station or West Covina Metrolink Station. Area "B" is also served by Foothill Transit bus route number 185, which links to the Metro Gold rail line in the City of Irwindale.

Opportunity Area “D” – East and West sides of N. Citrus Avenue Between E. Covina Boulevard and E. Cypress Street

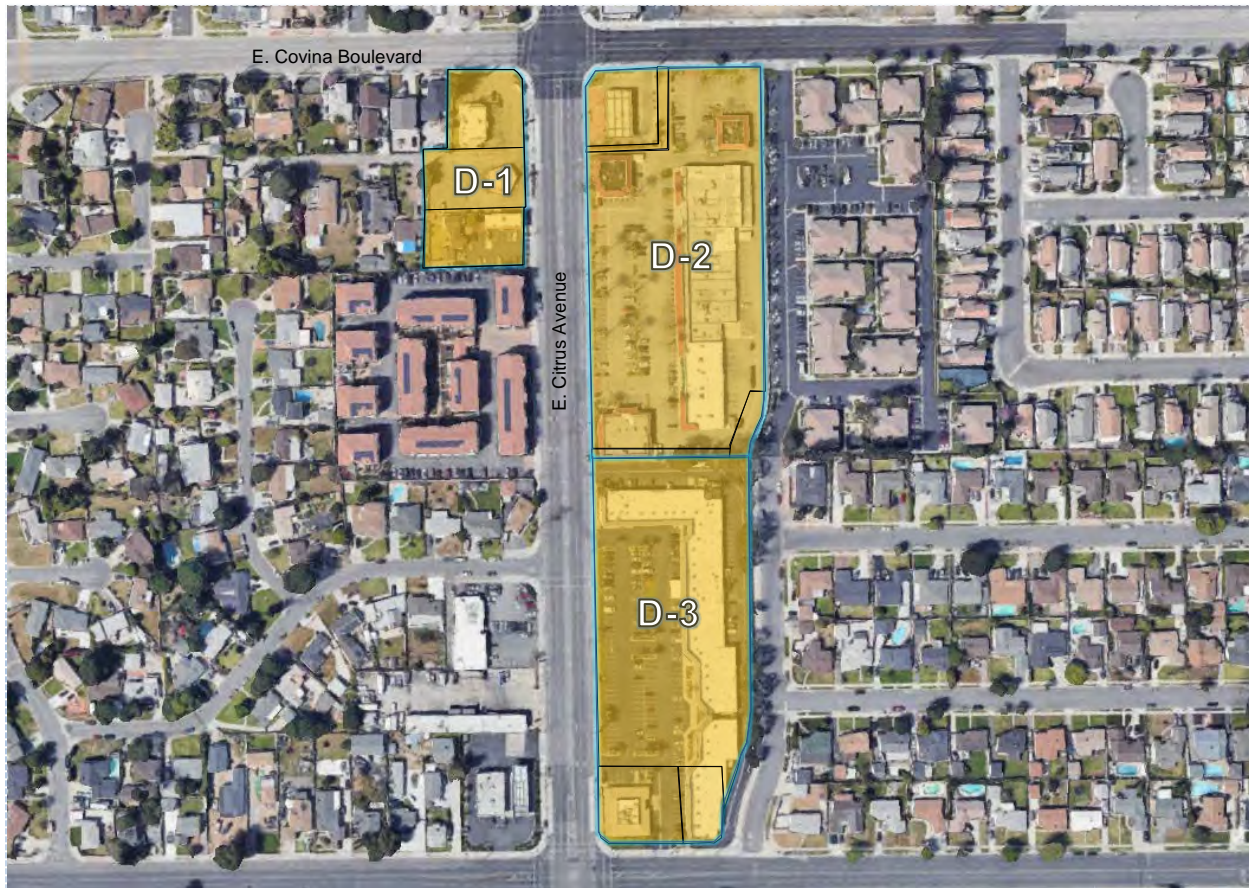


Figure 1. Area “D” (Subareas “D-1,” “D-2,” and “D-3” overall plan view picture)

Summary:

Site Addresses:

Subarea D-1: 1051, 1063 and 1085 N. Citrus Avenue

Subarea D-2: 1088 and 1024 Citrus Avenue

Subarea D-3: 900 and 902 N. Citrus Avenue

APN Numbers:

Subarea D-1: 8421-026-024, 8421-026-025, and 8421-026-028

Subarea D-2: 8421-001-013 and 8421-001-015 (1088 N. Citrus), 8421-001-16, 8421-001-017, 8421-001-008 (1024 N. Citrus)

Subarea D-3: 8422-001-009, 8422-001-011, 8422-001-012 (900 and 902 N. Citrus)

General Plan Designation: General Commercial

Zoning Classification:

Subarea D-1: C-2 Commercial Zone (Neighborhood Shopping Center), C-4 Commercial Zone (Highway) and Affordable Housing Mixed-Use Overlay District (AHMUOD)

Subarea D-2: C-2 Commercial Zone (Neighborhood Shopping Center) and Affordable Housing Mixed-Use Overlay District (AHMUOD)

Subarea D-3: C-2 Commercial Zone (Neighborhood Shopping Center) and Affordable Housing Mixed-Use Overlay District (AHMUOD)

Acreage:

Subarea D-1: Consolidation of the three parcels yields a combined 1.07 acre

Subarea D-2: Consolidation of the five parcels yields a combined 4.34 acres

Subarea D-3: Consolidation of the two parcels yields a combined 3.53 acres

TCAC/HCD Resource Category: High Resource Area

Estimated Housing Potential: A total of 286 units (21 units for Area "D-1," 148 units for Area "D-2," and 117 units for Area "D-3")

Qualified Census Tract: No

Description: Opportunity Area "D" comprises 11 parcels totaling 8.94 acres and is located on the east and west sides of N. Citrus Avenue and the south side of E. Covina Boulevard. The detailed description of Opportunity Area "D" is divided into three subareas as follows:

Subarea "D-1." The Subarea "D-1" is located on the southwest side of N. Citrus Avenue and E. Covina Boulevard and comprises three parcels. The corner parcel (1085 N Citrus) is a 2400-square-foot convenience store built in 1985. The parcel immediately south and located at 1063 N. Citrus contains a single-story structure built in 1962. The parcel is burdened with a 12-foot wide vehicular and fire access easement along the north property boundary for the existing single-family houses located towards the west side of the parcel. The single-story structure is a restaurant use. The parcel with the address of 1085 N. Citrus contains a single-family structure in the rear of the property. It was built in 1921 and later converted into a photography studio. Toward the front of the parcel is a 2,400 square feet two-story office structure built in 1972. All parcels in Area "D-1" are less than one acre in size. The structures are more than 40 years old. The average land-to-improvement ratio for the three parcels is about 1.30. The three parcels show deterioration in site, building improvements, and landscape maintenance. The north side of Area "D-1" are existing single-family uses. The east side of Area "D-1" are existing commercial centers. The west side of Area "D-1" is existing single-family use. The south side of Area "D-1" is an existing 52-unit condominium townhouse project (Citrus Village) developed in 2014.

In November 2021, the City rezoned Area "D-1" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. Based on the age of the structures, the declining commercial and office market conditions, and the low land-to-improvement value ratio, Area "D-1" is ripe for redevelopment. While ownership is unique to each parcel, lot consolidation is expected in Covina for repurposing and redevelopment since the City is built out with no vacant land. A recent example of lot consolidation is the 52-unit condominium project (Citrus Village) located south of Area "D-1" that was the result of

combining two parcels into two acres in 2014 for development. The lot consolidation of Area "D-1" will yield a total of 1 acre. Applying the AHMUOD to the parcels will facilitate either a mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development in meeting the moderate or above-moderate income criteria. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area D-1" can realistically accommodate at least 21 new housing units. Given that Area "D-1" is close to Downtown Covina, Metrolink Commuter Rail Station, and Foothill Transit Bus Station, the City anticipates the site will attract housing development during the 2021-2029 planning period. The photos below illustrate the existing conditions of Area "D-1."

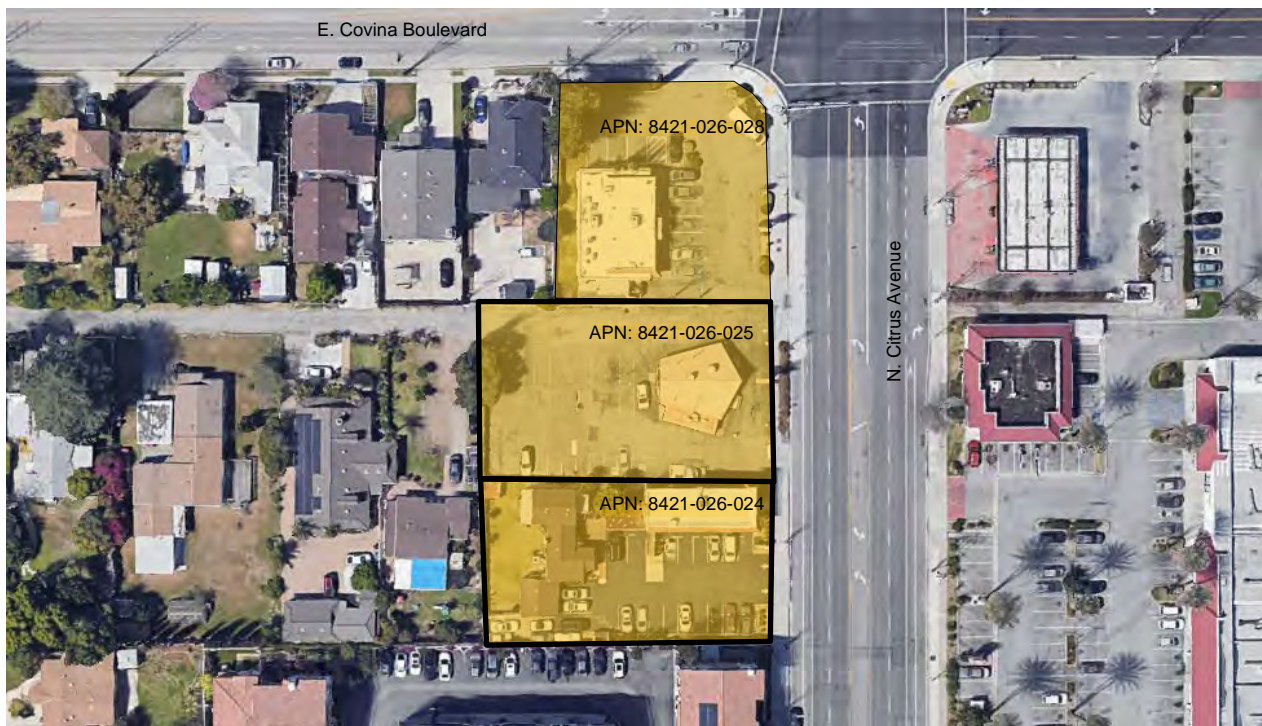


Figure 2. Subarea D-1: Southwest side of N. Citrus and E. Covina Aerial photo



Figure 3. View from N Citrus. (Subarea D-1)

Subarea "D-2." The Subarea "D-2" is located on the southeast of N. Citrus Avenue and E. Covina Boulevard and comprises five parcels. Three of the five parcels are very small size less than 0.10 acres and are narrow strips of land (20 feet or less in width) for driveway access, which cannot be standalone parcels for development. The corner parcels (1088 N Citrus) contains a gas station built in 1977. Immediately south of the gas station and located at 1024 N. Citrus is an existing commercial center consisting of three smaller multi-tenant pad buildings of approximately 11,000 square feet and one main multi-tenant building of approximately 39,000 square feet. A parking lot in front of the main building provides parking spaces for the commercial center. The commercial center was built in the early 1960s and might have a façade updated in the 1980s. The structures are more than 40 years old. The average land-to-improvement ratio for the three parcels is less than one (0.73). The parcels show deterioration in site and building improvements and landscape maintenance. The north side of Area "D-2" is existing single-family use. The east side of Area "D-2" is an existing affordable apartment complex (Village Green Apartments). On the west side of Area "D-2" are existing multi-family townhouses (Citrus Village) and commercial use. The south side of Area "D-2" is an existing commercial center.

In November 2021, the City rezoned Area "D-2" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. Based on the age of the structures, the declining commercial and office market conditions, and the low land-to-improvement value ratio, Area "D-2" is ripe for redevelopment. While ownership is unique to each parcel, lot consolidation is expected in Covina for repurposing and redevelopment since the City is built out with no vacant land. A recent example of lot consolidation is the 52-unit condominium project (Citrus Village) located south of Area "D-1" that was the result of

combining two parcels into two acres in 2014 for development. The lot consolidation of Area "D-2" will yield 4 acres. Applying the AHMUOD to the parcels will facilitate either a mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development in meeting the very low and low income criteria. The City's 90 percent assumption of the permitted density is equal to 36 dwelling units per acre. Therefore, Area "D-2" can easily accommodate 148 new housing units. Since the location of Area "D-2" is close to Downtown Covina, Metrolink Commuter Rail Station, and Foothill Transit Bus Station, the City anticipates the site will attract housing development during the 2021-2029 planning period. The photos below illustrate the existing conditions of Area "D-2."



Figure 4. Subarea D-2 is located on South of E. Covina Boulevard and East of N. Citrus Avenue



Figure 5. View from E. Covina Boulevard facing southwest



Figure 6. View from the intersection of E. Covina Boulevard and N. Citrus Avenue facing southeast



Figure 7. View of Subarea D-2 from N. Citrus Avenue

Subarea "D-3." The Subarea "D-3" is located northeast of N. Citrus Avenue and E. Cypress Street and comprises three parcels. The site is developed with a commercial center consisting of an approximately 5,000 square foot freestanding restaurant building and an "L" shaped building of about 42,000 square feet. The commercial center was built in the early 1970s, and the structures are over 40 years old. The average land-to-improvement ratio for the five parcels is less than one (0.98). The parcels show deterioration in site and building improvements and landscape maintenance. The north side of Area "D-3" is an existing commercial center. On the east side of Area "D-3" are existing single-family houses. Area "D-3" 's west side is an existing multi-family townhouse (Citrus Village). On the south side of Area "D-3" are existing single-family houses.

In November 2021, the City rezoned Area "D-3" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. Based on the age of the structures, the declining commercial and office market conditions, and the low land-to-improvement value ratio, Area "D-3" is ripe for redevelopment. While ownership is unique to each parcel, lot consolidation is expected in Covina for repurposing and redevelopment since the City is built out with no vacant land. A recent example of lot consolidation is the 52-unit condominium project (Citrus Village) located south of Area "D-1" that was the result of combining two parcels into two acres in 2014 for development. The lot consolidation of Area "D-3" will yield a total of 3.5 acres. Applying the AHMUOD to the parcels will facilitate either a mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development in meeting the very low and low income criteria. The City's 90 percent assumption of the permitted density is equal to 36 dwelling units per acre. Therefore, Area "D-3" can easily accommodate at least 117 new housing units. Since Area "D-3" is close to Downtown

Covina, Metrolink Commuter Rail Station, and Foothill Transit Bus Station, the City anticipates the site will attract housing development during the 2021-2029 planning period. The photos below illustrate the existing conditions of Area “D-3.”



Figure 8. View of Subarea D-3



Figure 9. View from N Citrus facing southeast



Figure

10 View from the intersection of E. Cypress Street and N. Citrus Avenue facing northwest.

Land Use Regulations: The City's General Plan Land Use Map shows that Area "D" is designated General Commercial. The Zoning classification for Area "D-1" is C-2 Commercial Zone (Neighborhood Shopping Center) and C-4 Commercial Zone (Highway). The Zoning classification for Area "D-2" and Area D-3" is C-2 Commercial Zone (Neighborhood Shopping Center). In November 2021, the City of Covina rezoned Area D ("D-1", "D-2" and "D-3") by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. Adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" is a "capture value" that increases the land value of the parcel, which leads to housing opportunity. AHMUOD allows a density of up to 40 dwelling units per acre. Applying the AHMUOD to the parcels will facilitate either an amenity-rich mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development with at least a minimum of 20 percent of the total units meeting the household income criteria. This area will benefit from the introduction of residential uses. The City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "D" ("D-1," "D-2" and D-3"), and given the recent City's residential development trends, the City assumes that the site can achieve at least 90 percent of the permitted density. The City's 90 percent assumption of the permitted density is equal to 36 dwelling units per acre; therefore, Area "D" (a combination of housing units for "D-1," "D-2," and "D-3") can easily accommodate at least 286 new housing units. The density of 36 dwelling units per acre is considered appropriate in accommodating the development of housing units for very low and low income households. The number of new units for Area "D" will distribute across the very low and low income groups in line with the City's RHNA allocation percentages.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "D" ("D-1," "D-2," and "D-3") are within a High Resource Area (Census Tract 0637406000 for "D-1" and Census Tract 0637403721 for "D-2" and "D-3") but do not fall within a Qualified Census Tract (QCT). Staff analyzed Area "D" to assess the TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area D is well-positioned to have lower and moderate-income residential development because of the proximity to amenities. Area "D" is along a north/south major corridor (N. Citrus Avenue) serviced by Foothill Transit bus route number 261 that provides a transit link to Covina Metrolink Commuter Rail Station, Foothill Transit Park and Ride, and City of Azusa Metro Gold-Line Light Rail Station. Area "D" is close to the commercial corridor of N. Citrus Avenue and Downtown Covina, which provides commercial, office, and retail services to residents. Area "D" is within half a mile of Emanate Hospital and medical health services. The Cypress Elementary School is within walking distance of approximately a quarter mile. Area "D" is within half a mile of 4 parks, namely Kelby Park, Edna Park, Civic Center Park, and Covina Park.

Opportunity Area "G-1" – Northeast Side of E. Rowland Street and S. San Jose Avenue



Figure 1. Aerial Image of Area G-1

Summary:

Site Addresses: 401 E. Rowland Street, 560 and 568 S. San Jose Avenue

APN Numbers:

General Plan Designation: General Commercial

Zoning Classification: C-P Commercial, Administrative, and Professional Office Zone and Affordable Housing Mixed-Use Overlay District (AHMUOD)

Acreage: Consolidation of the 3 parcels yields a combined 0.75 acres

TCAC/HCD Resource Category: High Resource Area

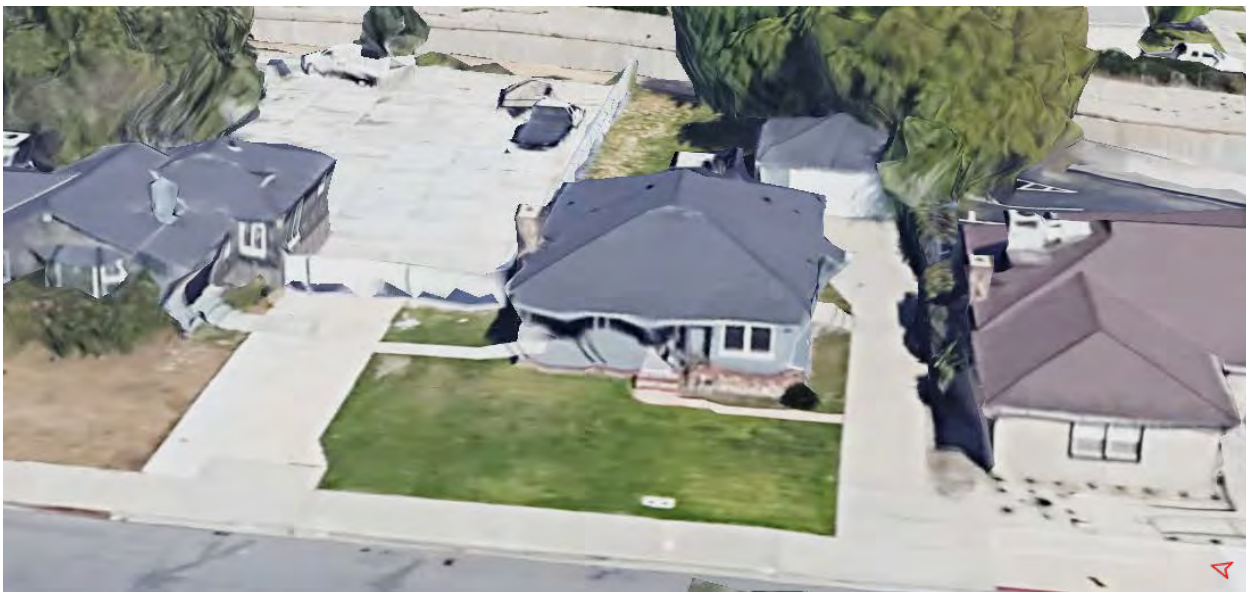
Estimated Housing Potential: 13 units

Qualified Census Tract: No

Description: Opportunity Area "G-1" comprises 3 parcels totaling 0.75 acres and is located on the northeast side of E. Rowland Street and S. San Jose Avenue. Area "G-1" was developed with single-family structures, which had been converted to office use in the 1980s. All parcels in Area "G-1" are less than one acre in size, and the City's records showed they were originally developed around the 1940s. The structures are more than 70 years old. The land-to-improvement ratio is low, with an average of 0.33. All three structures front on N. San Jose Avenue. The parking areas that serve the office use is toward the east side of the structures. None of the parcels show any significant upgrades and improvements. The north and east side of Area "G-1" are existing apartments. The

south side of Area "G-1" are one-story office buildings and two-story apartment complexes. The west side of Area "G-1" are an existing church and office buildings.

In November 2021, the City rezoned Area "G-1" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. Based on the age of the structures, the declining commercial and office market conditions, and the low land-to-improvement value ratio, Area "G-1" is ripe for redevelopment. While ownership is unique to each parcel, lot consolidation is common in Covina for repurposing and redevelopment since the City is built-out with no vacant land. The lot consolidation is evidenced by new housing projects in the City, such as the new 132-unit multi-phased condominium housing project (Covina Bowl) located at the southwest side of W. San Bernardino Road and N. Rimsdale Avenue and the approved 28-unit apartment project located at 1201 W. Badillo Street. These two projects demonstrated a local market trend where similar small-sized lots with existing structures were consolidated and redeveloped with the new multi-family housing projects. The lot consolidation of Area "G-1" will yield a total of 0.75 acres. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "G-1" can easily accommodate at least 17 new housing units. The photos below illustrate the existing conditions of Area "G-1."



Overhead view facing east.

Figure 1.



Figure 2. North-facing view from E. Rowland Street.

Land Use Regulations: The City's General Plan Land Use Map shows that Area "G--1" is designated General Commercial, and the Zoning classification is C-P Commercial, Administrative and Professional Office Zone. In November 2021, the City of Covina rezoned the site by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. AHMUOD allows a density of up to 40 dwelling units per acre. The application of the AHMUOD to the parcels will facilitate either a mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development in meeting the moderate or above-moderate income criteria. The City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "G-1," and given the recent City's residential development trends, the City assumes that the site can achieve at least 50 percent of the permitted density. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "G-1" can easily accommodate at least 17 new housing units. The density of 20 dwelling units per acre is considered appropriate in accommodating the development of housing units for moderate, or above moderate-income households. The number of units for Area "G-1" will distribute across the moderate and above-moderate income groups proportionate to the City's RHNA allocation percentages.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "G-1" are within a Moderate Resource Area (Census Tract 0637406103) but do not

fall within a Qualified Census Tract (QCT). Area "G-1" was analyzed to assess TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area "G-1" is well positioned to have lower and moderate-income residential development because of the proximity to amenities. Area "G-1" is along an east-west major corridor (E. Rowland Street) serviced by Foothill Transit bus routes numbers 190 and 261 that provide transit link to Covina Metrolink Commuter Rail Station and City of Azusa Metro Gold-Line Light Rail Station. Area "G-1" is close to the commercial corridor of S. Citrus Avenue which provides commercial, office, and retail services to residents. The Barranca Elementary school is within walking distance of less than 500 feet.

Opportunity Area "G-2" – North Side of Rowland Street between South San Jose Avenue and S. Stewart Drive



Summary:

Site Addresses: 361, 373, E. Rowland Street, 563 and 571 S. San Jose Avenue

APN Numbers: 8445-025-022 and 8445-025-006, 8445-025-009, 8445-025-010 and 8445-025-011

General Plan Designation: General Commercial

Zoning Classification: C-P Commercial, Administrative, and Professional Office Zone and Affordable Housing Mixed-Use Overlay District (AHMUOD)

Acreage: Consolidation of the 6 parcels yields a combined 1.08 acres

TCAC/HCD Resource Category: High Resource Area

Estimated Housing Potential: 22 units

Qualified Census Tract: No

Description: Opportunity Area "G-2" comprises 5 parcels totaling 1.08 acres and is located on the north side of E. Rowland Street between S. San Jose Avenue and S. Stewart Street. Area "G-2" was developed with two single-story office structures. The structure located at 361 E. Rowland Street is about 10,000 square feet in size, and it is a church use with the parking lot at the north side of the structure. The structure located at 373 E Rowland Street, 563 and 571 S. San Jose Avenue is a about 6,900 square feet and it is a multi-tenant office use with parking lot at the north side of the structure. All parcels in Area

"G-2" are less than one acre in size, and the City's records showed they were originally developed around the 1960s. The structures are more than 60 years old. The land-to-improvement ratio is low, with an average of 0.80. The two structures front on E. Rowland Street. None of the parcels show any significant upgrades and improvements. The south, west and east sides of Area "G-2" are existing one-story office buildings. The north side of Area "G-2" are multi-family and single-family uses.

In November 2021, the City rezoned Area "G-2" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. Based on the age of the structures, the declining commercial and office market conditions, and the low land-to-improvement value ratio, Area "G-2" is ripe for redevelopment. While ownership is unique to each parcel, lot consolidation is common in Covina for repurposing and redevelopment since the City is built-out with no vacant land. The parcels located at 373, E. Rowland Street, 563 and 571 S. San Jose Avenue have the same ownership, WLM, LLC (The McIntyre Group). The McIntyre Group is a local builder who has established a track record in partnering with the City in building housing units. The local builder has completed a 10-unit apartment complex in Downtown Covina and in November 2022 received City's approval to construct a new 4-story, 17-unit apartment building on an approximately 0.4 acre lot. The local builder has the financial means to acquire the adjacent church site and create opportunity for housing project. The lot consolidation is further evidenced by new housing projects in the City, such as the new 132-unit multi-phased condominium housing project (Covina Bowl) located at the southwest side of W. San Bernardino Road and N. Rimsdale Avenue and the approved 28-unit apartment project located at 1201 W. Badillo Street. These two projects demonstrated a local market trend where similar small-sized lots with existing structures were consolidated and redeveloped with the new multi-family housing projects. The lot consolidation of Area "G-2" will yield a total of 1.08 acres. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "G-2" can easily accommodate at least 22 new housing units. The photos below illustrate the existing conditions of Area "G-2."



Figure 2. View from Rowland Street facing northeast.



View from Stewart Drive facing Southeast.

Figure 2.



Figure 3.

View from S San Jose Avenue facing southwest

Land Use Regulations: The City's General Plan Land Use Map shows that Area "G-2" is designated General Commercial, and the Zoning classification is C-P Commercial, Administrative and Professional Office Zone. In November 2021, the City of Covina rezoned the site by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. AHMUOD allows a density of up to 40 dwelling units per acre. The application of the AHMUOD to the parcels will facilitate either a mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development with at least a minimum of 20 percent of the total units meeting the household income criteria. The City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "G-2," and given the recent City's residential development trends, the City assumes that the site can achieve at least 50 percent of the permitted density. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "G-2" can realistically accommodate 22 new housing units. The density of 20 dwelling units per acre is considered appropriate in accommodating the development of housing units for moderate, or above moderate-income households. The number of units for Area "G-2" will distribute across the moderate and above moderate income groups in line with the City's RHNA allocation percentages.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "G-2" are within a Moderate Resource Area (Census Tract 0637406103) but do not

fall within a Qualified Census Tract (QCT). Area "G-2" was analyzed to assess TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area "G-2" is well positioned to have lower and moderate-income residential development because of the proximity to amenities. Area "G-2" is along an east-west major corridor (E. Rowland Street) serviced by Foothill Transit bus routes numbers 190 and 261 that provide transit link to Covina Metrolink Commuter Rail Station and City of Azusa Metro Gold-Line Light Rail Station. Area "G-2" is close to the commercial corridor of S. Citrus Avenue which provides commercial, office, and retail services to residents. The Barranca Elementary school is within walking distance of less than 500 feet.

Opportunity Area "G-3" – South Side of Rowland Street, East of S. First Avenue

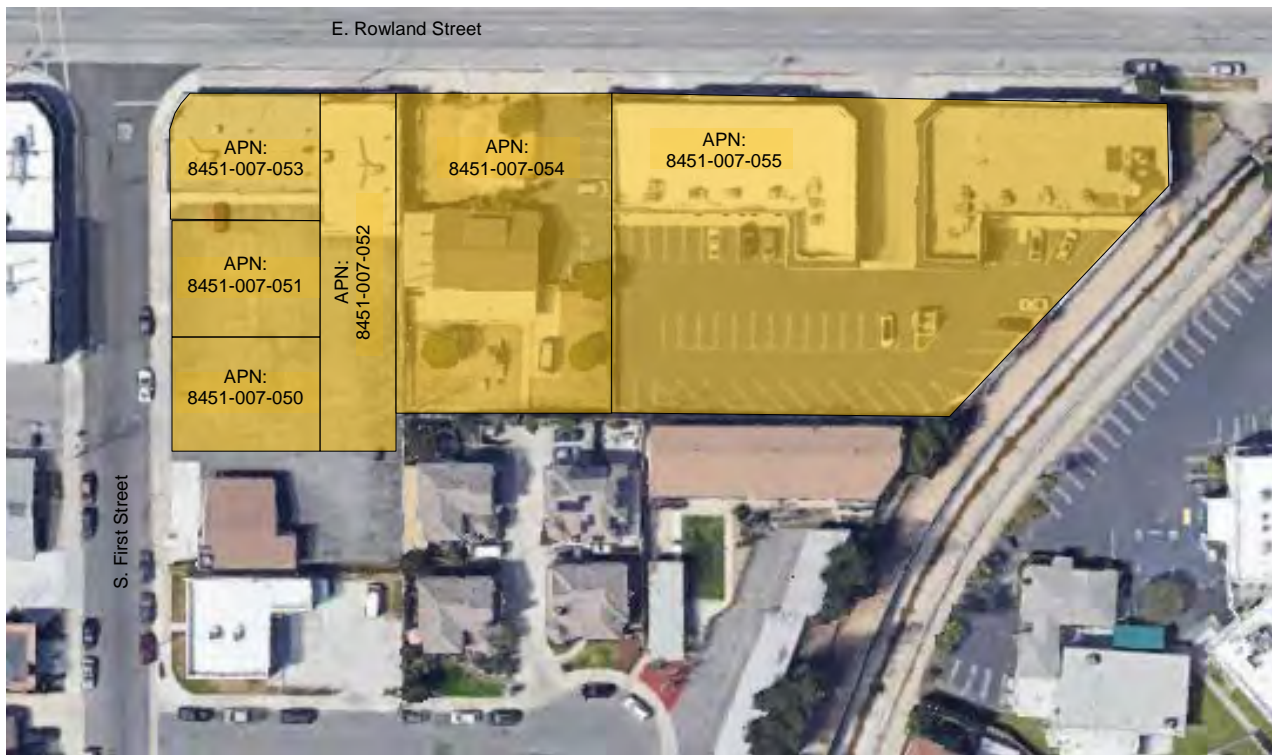


Figure 1. Aerial photo of Area "G-3" (6 parcels)

Summary:

Site Addresses: 322, 332, 344 and 354 E. Rowland Street

APN Numbers: 8451-007-050, 8451-007-051 and 8451-007-053 (322 E. Rowland), 8451-007-052, 8451-007-054, and 8451-007-055

General Plan Designation: General Commercial

Zoning Classification: C-3A Commercial Zone (Regional, or Community Shopping Center) and Affordable Housing Mixed-Use Overlay District (AHMUOD)

Acreage: Consolidation of the 6 parcels yields a combined 1.79 acres

TCAC/HCD Resource Category: Moderate Resource Area

Estimated Housing Potential: 51 units

Qualified Census Tract: No

Description: Opportunity Area "G-3" comprises 6 parcels totaling 1.79 acres and is located on the south side of E. Rowland Street and east side of S. First Avenue. The site located at 322 and 332 E. Rowland comprises of 4 parcels and is developed with two 1-story office structures. The building sizes of 322 and 332 E. Rowland are 3,300 and 2,400 square feet respectively. The parking lot that services the two office structures are located at the south side of the structures. The site located at 344 E. Rowland contains a single-story house converted to a Montessori school and preschool. The school has moved and the site is now unoccupied. The site located at 354 E. Rowland contains two 1-story office structures totaling 14,700 square feet. There are multiple tenants

occupying the two office buildings with parking lot at the south side of the structures. All parcels in Area "G-3" are less than one acre in size, and the City's records showed they were originally developed around the 1950s. The structures are more than 60 years old. The land-to-improvement ratio is low, with an average of 0.98. None of the parcels show any significant upgrades and improvements. The north, west and south sides of Area "G-3" are existing one-story office buildings. The east side of Area "G-3" are multi-family uses and a theology seminary.

In November 2021, the City rezoned Area "G-3" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. Based on the age of the structures, the declining commercial and office market conditions, and the low land-to-improvement value ratio, Area "G-3" is ripe for redevelopment. The site with the 4 parcels located at 322 and 332 E. Rowland Street has the same property owner, and she has expressed to the City her interests in redeveloping the site with a mixed-use project. The site located at 354 E. Rowland Street, is owned by WLM, LLC (The McIntyre Group). The McIntyre Group is a local builder who has established a track record in partnering with the City in building housing units. The local builder has completed a 10-unit apartment complex in Downtown Covina and in November 2022 received City's approval to construct a new 4-story, 17-unit apartment building on an approximately 0.4 acre lot. The local builder has the financial means to acquire the adjacent Montessori School site located 344 E. Rowland and create the opportunity for housing project.

While ownership is unique to each parcel, lot consolidation is common in Covina for repurposing and redevelopment since the City is built-out with no vacant land. The lot consolidation is further evidenced by new housing projects in the City, such as the new 132-unit multi-phased condominium housing project (Covina Bowl) located at the southwest side of W. San Bernardino Road and N. Rimsdale Avenue and the approved 28-unit apartment project located at 1201 W. Badillo Street. These two projects demonstrated a local market trend where similar small-sized lots with existing structures were consolidated and redeveloped with the new multi-family housing projects. The lot consolidation of 322 E. Rowland and 344 E. Rowland (4 parcels of Area "G-3") will yield a total of 0.84 acres. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, 322 E. Rowland and 344 E. Rowland can easily accommodate at least 17 new housing units. The site at 354 E. Rowland could be a standalone parcel for new residential development, having a parcel size of 0.95 acre. The City's 90 percent assumption of the permitted density of 40 dwelling units per acre is equal to 36 dwelling units per acre; therefore, 354 E. Rowland can easily accommodate at least 34 new housing units. The total combined new housing units for Area "G-3" is 51 units. The photos below illustrate the existing conditions of Area "G-3."



Figure 3. View from Rowland Street facing southeast. (322 and 332) show also the parking lot in the back



Figure 2.

View from First Street facing northwest



Figure 3.

View from Rowland Street facing southwest. (344)



Figure 3.

View from Rowland Street facing southwest. (354)

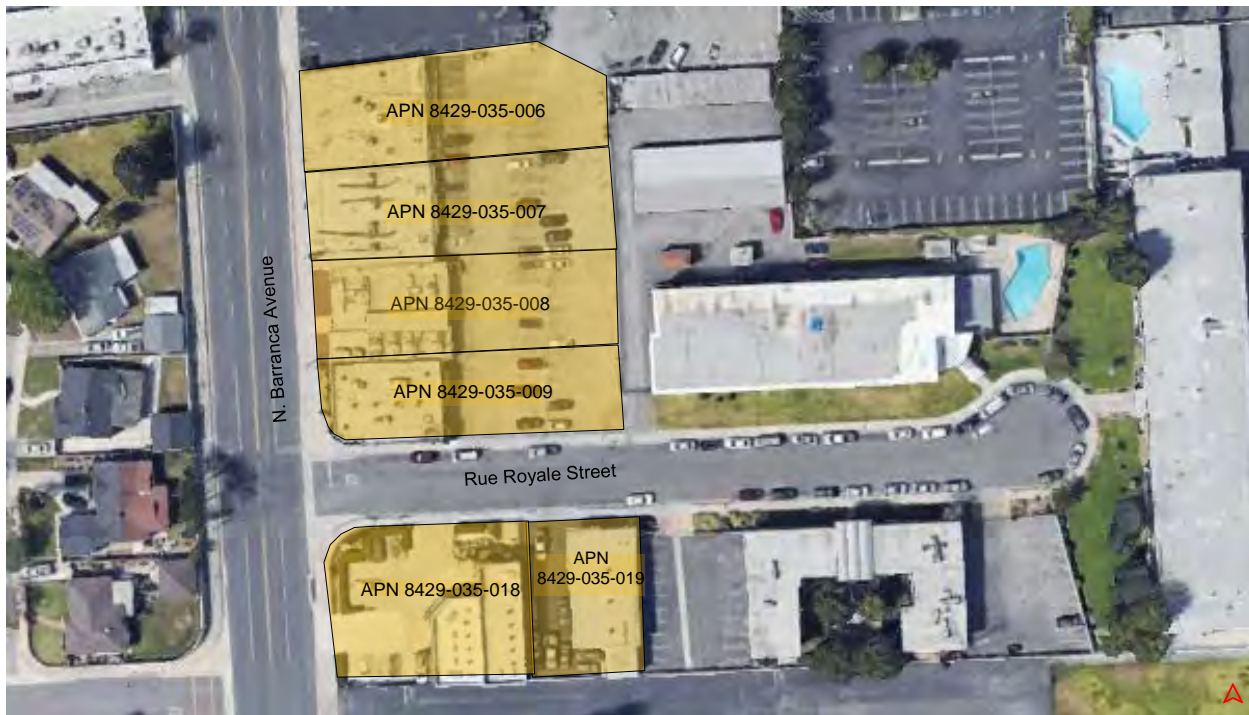
Land Use Regulations: The City's General Plan Land Use Map shows that Area "G-3" is designated General Commercial, and the Zoning classification is C-3A Commercial Zone ((Regional, or Community Shopping Center). In November 2021, the City of Covina rezoned the site by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. AHMUOD allows a density of up to 40 dwelling units per acre. The application of the AHMUOD to the parcels will facilitate either an amenity-rich mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development with at least a minimum of 20 percent of the total units meeting the household income criteria. The City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "G-3," the City assumes lot consolidation of 322 E. Rowland and 344 E. Rowland (4 parcels of Area "G-3") as one site, and assumes 354 E. Rowland as a standalone site since its parcel size is 0.95 acre. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, 322 E. Rowland and 344 E. Rowland can easily accommodate at least 17 new housing units for moderate and above moderate income criteria. With respect to the standalone site at 354 E. Rowland, the City makes the assumption of 90 percent of the permitted density of 40 dwelling units per acre, which is equal to 36 dwelling units per acre; therefore, 354 E. Rowland can easily accommodate at least 34 new housing units for very low and low income criteria. The total combined new housing units for Area "G-3" is 51 (17 plus 34) units.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "G-3" are within a Moderate Resource Area (Census Tract 0637406103) but do not fall within a Qualified Census Tract (QCT). Area "G-3" was analyzed to assess TCAC

amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area "G-3" is well positioned to have lower and moderate-income residential development because of the proximity to amenities. Area "G-3" is along an east-west major corridor (E. Rowland Street) serviced by Foothill Transit bus routes numbers 190 and 261 that provide transit link to Covina Metrolink Commuter Rail Station and City of Azusa Metro Gold-Line Light Rail Station. Area "G-3" is close to the commercial corridor of S. Citrus Avenue which provides commercial, office, and retail services to residents. The Barranca Elementary school is within walking distance of approximately a quarter mile.

Opportunity Area "J" – East Side of N. Barranca Avenue, North and South Sides of E. Rue Royale Street.



Summary:

Site Addresses: 440, 430, 426, 412 and 404 N. Barranca Avenue, and 520 E. Rue Royale Street

APN Numbers: 8429-035-006, 8429-035-007, 8429-035-008, 8429-035-009, 8429-035-018, and 8429-035-019

General Plan Designation: General Commercial

Zoning Classification: C-4 Commercial Zone (Highway) and Affordable Housing Mixed-Use Overlay District (AHMUOD)

Acreage: Consolidation of the six parcels yields a combined 1.44 acres

TCAC/HCD Resource Category: Moderate Resource

Estimated Housing Potential: 29 units

Qualified Census Tract: No

Description: Opportunity Area "J" comprises six parcels totaling 1.44 acres and is located on the east side of N. Barranca Avenue and the north and south sides of E. Rue Royale Street. Area "J" is developed with single-story structures less than 15 feet in height and currently contains a range of commercial and office uses. Presently, there are at least two vacant tenant spaces. All parcels in Area "J" are less than one acre in size, and the City's records showed they were developed around the 1960s. The structures are more than 50 years old. The land-to-improvement ratio is low, with an average of 0.70. All structures front on N. Barranca Avenue, except for 520 E. Rue Royale Street. The parking lot is on the east side of the structures and is poorly maintained and deteriorated. None

of the parcels show any significant upgrades and improvements. East of Area "J" are existing apartments with significant exterior improvements completed in 2022. South of Area "J" is the Covina Valley Unified School District Office, plus an Elementary school with after-school and extended daycare services (Pioneer Preschool) as well as providing adult education (Pioneer Center). West of Area "J" are existing single-family homes. North of Area "J" are commercial uses.

In November 2021, the City rezoned Area "J" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. Based on the age of the structures, the declining commercial and office market conditions, and the low land-to-improvement value ratio, Area "J" is ripe for redevelopment. While ownership is unique to each parcel, lot consolidation is common in Covina for repurposing and redevelopment since the City is built-out with no vacant land. The lot consolidation is evidenced by new housing projects in the City, such as the new 132-unit multi-phased condominium housing project (Covina Bowl) located at the southwest side of W. San Bernardino Road and N. Rimsdale Avenue and the approved 28-unit apartment project located at 1201 W. Badillo Street. These two projects demonstrated a local market trend where similar small-sized lots with existing structures were consolidated and redeveloped with the new multi-family housing projects. The lot consolidation of Area "J" will yield a total of 1.44 acres. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "J" can easily accommodate at least 29 new housing units. The photos below illustrate the existing conditions of Area "J."



Figure 4. View from N. Barranca Avenue facing East.



Figure 5. View from Rue Royale Street facing northwest.

Land Use Regulations: The City's General Plan Land Use Map shows that Area "J" is designated General Commercial, and the Zoning classification is C-4 Commercial Zone (Highway). In November 2021, the City of Covina rezoned the site by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. AHMUOD allows a density of up to 40 dwelling units per acre. The application of the AHMUOD to the parcels will facilitate either a mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development in meeting the moderate or above-moderate income criteria. Given the size of Area "J," the City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "J," and given the recent City's residential development trends, the City assumes that the site can achieve at least 50 percent of the permitted density. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "J" can easily accommodate at least 29 new housing units. The density of 20 dwelling units per acre is considered appropriate in accommodating the development of housing units for moderate, or above moderate-income households.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "J" are within a Moderate Resource Area (Census Tract 0637403722) but do not fall within a Qualified Census Tract (QCT). Area "J" was analyzed to assess TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area "J" is well positioned to have lower and moderate-income residential development because of the proximity to amenities. Area "J" is within half a mile of Covina Metrolink Commuter Rail Station and is within walking distance, less than 500 feet, of the Foothill Transit major bus route

number 190 along E. San Bernardino Road. Area "J" is close to the commercial corridor of E. San Bernardino Road, which provides commercial, office, and retail services to residents. An elementary school with daycare services is within walking distance of less than 500 feet.

Opportunity Area "K-1" – North Side of W. San Bernardino Road and East Side of N. Janalinda Avenue



Summary:

Site Addresses: 1109, 1123, 1131, 1139, 1145 and 1151 W. San Bernardino Road

APN Numbers: 8434-002-018, 8434-002-011, 8434-002-024, 8434-002-013, 8434-002-014, and 8434-002-021

General Plan Designation: GC, General Commercial

Zoning Classification: C-P (AHMUOD), Commercial, Administrative, and Professional Office Zone and Affordable Housing Mixed-Use Overlay District

Acreage: Consolidation of the six parcels yields 1.53 acres combined

TCAC/HCD Resource Category: High

Estimated Housing Potential: 28 units

Qualified Census Tract: No

Description: Opportunity Area "K-1" comprises six parcels totaling 1.53 acres and is located on the north side of W. San Bernardino Road and the east side of N. Janalinda Avenue. Area "K-1" is currently developed with an office building for the parcel with the 1109 street address, and the remaining five parcels are developed with single-family structures. Three single-family structures are converted to office use, and the two remain as single-family use. All parcels in Area "K-1" are less than one acre in size, and the City's records showed they were developed around 1949/1951, except for the office building,

which was built in 1970. All structures are more than 50 years old. The land to improvement ratio is low, with an average of 0.37. None of the parcels show any significant upgrades and improvements. South of the Area "K-1" are apartment complexes and a new 132-unit multi-phased condominium project (Covina Bowl) under construction and selling. Given the declining office market condition, the potential to consolidate the parcels is high for redevelopment into housing units similar to the Covina Bowl project located south of Area "K-1."

Description of 1109 W. San Bernardino: The parcel is developed with a two-story office building on the west side with a parking lot to the east. The parcel is the largest of the parcels in Area "K-1" at 0.43 acre. However, the land to improvement ratio is low at less than 1.

Description of 1123 W. San Bernardino: The parcel contains an existing one-story single-family house built in 1949, according to the City's permit records. It is a legal, non-conforming single-family use because the site is zoned C-P Commercial, Administrative, and Professional Office. The property is underutilized, and the land to improvement ratio is low at 0.25.

Description of 1131, 1139, and 1145 W. San Bernardino: The three parcels contain existing one-story single-family structures built in 1949/1950 but were converted to office use in 1990. The three properties are underutilized, and the land to improvement ratio is below 0.25.

Description of 1151 W. San Bernardino: The parcel contains an existing one-story single-family house built in 1950, according to the City's permit records. It is a legal, non-conforming single-family use because the site is zoned C-P Commercial, Administrative, and Professional Office. The property is underutilized, and the land to improvement ratio is low at 0.18.

In November 2021, the City rezoned Area "K-1" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. Given that south of Area "K-1" are existing multi-family complexes and a new 132-unit multi-phased condominium project (Covina Bowl) under construction and currently selling well, it is assumed that Area "K-1" will have a high probability of lot consolidation for new housing development. The adjacent new 132-unit condominium housing project (Covina Bowl) established a local market trend in that small size lots less than one parcel were consolidated and redeveloped with the new housing project. The lot consolidation of Area "K-1" will yield a total of 1.53 acres. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "K-1" can easily accommodate at least 28 new housing units.



Figure 6.

Overhead view of the six parcels in making up Opportunity Area K-1



Figure 7.

View from Intersection of N Janalinda Avenue and West San Bernardino Road facing northeast. Westernmost parcel in Area K-1.



Figure 3. View from W San Bernardino Road facing north.

Land Use Regulations: The City's General Plan Land Use Map shows that Area "K-1" is designated General Commercial, and the Zoning classification is C-P Commercial, Administrative, and Professional Office Zone. In November 2021, the City of Covina rezoned the site by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. AHMUOD allows a density of up to 40 dwelling units per acre. Applying the AHMUOD to the parcels will facilitate either an amenity-rich mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development in meeting the moderate or above-moderate income criteria. This area will benefit from the introduction of residential uses. The City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "K-1", and given the recent City's residential development trends, the City assumes that the site can achieve at least 50 percent of the permitted density. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "K-1" can realistically accommodate at least 28 new housing units. The density of 20 dwelling units per acre is considered appropriate in accommodating the development of housing units moderate, or above moderate-income households.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "K-1" are within a High Resource Area (Census Tract 06037405702) but do not fall within a Qualified Census Tract (QCT). Area "K-1" was analyzed to assess TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area "K-1" is well positioned to have lower and moderate-income residential development because of the site's size and the proximity to amenities. Area "K-1" is within 1 mile from Lark Ellen Elementary School and Las Palmas Middle School. Area "K-1" fronts onto W. San Bernardino Road and is served by Foothill Transit major bus route (190) that heads to Baldwin Park Metrolink Station or West Covina Metrolink Station. The site is less than half a mile from major commercial centers at W. San Bernardino Road and N. Azusa Avenue.

Opportunity Area "K-2" – North Side of W. San Bernardino Road, West Side of N. Janalinda Avenue, and East of N. Lark Ellen Avenue



Summary:

Site Addresses: 1171, 1205, 1211, 1217, 1229, 1235, 1241, 1247 and 1257 W. San Bernardino Road

APN Numbers: 8434-003-022, 8434-003-019, 8434-003-018, 8434-003-017, 8434-003-016, and 8434-003-015, 8434-003-014 (tied to 8434-004-020), 8434-004-023, and 8434-004-033

General Plan Designation: GC, General Commercial

Zoning Classification: C-P (AHMUOD), Commercial, Administrative, and Professional Office Zone and Affordable Housing Mixed-Use Overlay District

Acreage: Consolidation of the ten parcels yields 2.70 acres combined

TCAC/HCD Resource Category: High

Estimated Housing Potential: 59 units

Qualified Census Tract: No

Description: Opportunity Area "K-2" comprises ten parcels totaling 2.70 acres and is located on the north side of W. San Bernardino Road and the west side of N. Janalinda Avenue. Area "K-2" is currently developed with a range of structures from office buildings to single-family structures converted to office use, a children's daycare, and single-family use. All parcels in Area "K-2" are less than one acre in size, and the City's records showed they were developed around the 1950s, except for the two office buildings, which were

built in the 1980s. The majority of structures are more than 70 years old. The land-to-improvement ratio is low, with an average of 0.25. None of the parcels show any significant upgrades and improvements. Given the declining office market condition, the potential to consolidate the parcels is high for redevelopment into housing units similar to the Covina Bowl project located south of Area "K-1."

Description of 1171 W. San Bernardino: The parcel is developed with a two-story office building on the west side with a parking lot to the east. The parcel is the largest of the parcels in Area "K-2" at 0.43 acre. However, the land-to-improvement ratio is at 6.0.

Description of 1205 W. San Bernardino: The parcel contains an existing one-story single-family house built in 1924, according to the City's permit records. The site appears to have an accountant office business; however, the City does not have a record of conversion to office use, and in 1987, the City sent a letter to the property owner to cease the office use. It is a non-conforming single-family use because the site is zoned C-P Commercial, Administrative, and Professional Office. The property is underutilized, and the land-to-improvement ratio is low at 0.25.

Description of 1211 W. San Bernardino: The parcel contains an existing one-story single-family house built in 1950, according to the City's permit records. It is a legal, non-conforming single-family use because the site is zoned C-P Commercial, Administrative, and Professional Office. The property is underutilized, and the land-to-improvement ratio is low at 0.32.

Description of 1217 W. San Bernardino: The parcel is developed with a two-story office building of about 3,800 square feet in 1986. The land-to-improvement ratio is at 2.10.

Description of 1229 and 1235 W. San Bernardino: Each parcel contains an existing one-story single-family house built in 1951, according to the City's permit records. It is a legal, non-conforming single-family use because the site is zoned C-P Commercial, Administrative, and Professional Office. The property is underutilized, and the land-to-improvement ratio is low at an average of 0.45.

Description of 1241 W. San Bernardino (APN: 8434-003-014 and 8434-004-020): The parcel is about 0.41 acres and contains an existing one-story single-family house built in 1955, according to the City's permit records. Within the front yard area is a non-conforming use, a "fruit stand," that is deteriorated and boarded up. The entire site is poorly maintained. It is a legal, non-conforming single-family use because the site is zoned C-P Commercial, Administrative, and Professional Office. The property is underutilized, and the land-to-improvement ratio is low at 0.60.

Description of 1247 W. San Bernardino: The parcel contains an existing one-story single-family structure built in 1950, according to the City's permit records. It is a legal, non-conforming single-family use because the site is zoned C-P Commercial, Administrative,

and Professional Office. The property is underutilized, and the land-to-improvement ratio is low at 0.18.

Description of 1257 W. San Bernardino: The parcel was developed with two one-story structures in 1969 for office use. The structures and site improvements are poorly maintained. The property is underutilized, and the land-to-improvement ratio is low at 0.27.

In November 2021, the City rezoned Area “K-2” by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. The average parcel size of Area “K-2” is less than a quarter of an acre, and all the parcels have a land-to-improvement ratio of less than one, which indicates little investments in this area over the last several decades. Based on the age of the structures, the declining office market condition, and the low land-to-improvement value ratio, Area “K-2” is ripe for redevelopment. The new 132-unit multi-phased condominium housing project (Covina Bowl) within half a mile from Area “K-2” established a local market trend in that similar small-sized lots with existing structures were consolidated and redeveloped with the new housing project. Of the ten parcels in Area “K-2,” each of the nine parcels except the site at 1257 W. San Bernardino, has parcel size smaller than 0.50 acre. The lot combination of these nine parcels yield a total of 2.13 acres. The site at 1257 W. San Bernardino has a parcel size of 0.57 acre. The photos below illustrate the existing conditions of Area “K-2.”



Figure 8. Street view facing Northeast from W. San Bernardino Road. Westernmost portion of Area “K-2”





Figure 9. A closer view of seven parcels in the center portion of Area "K-2".



Figure

4. View from W. San Bernardino Road facing North.

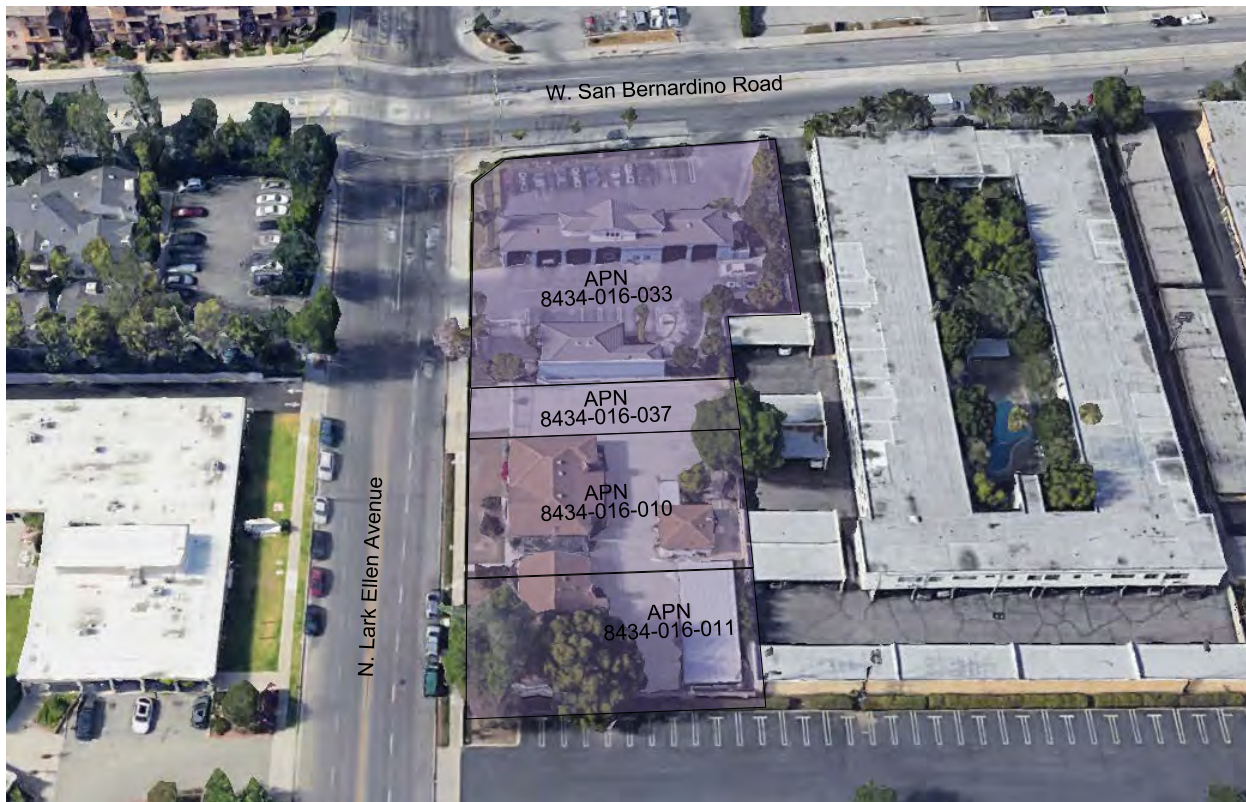
Land Use Regulations: The City's General Plan Land Use Map shows that Area "K-2" is designated General Commercial, and the Zoning classification is C-P Commercial, Administrative, and Professional Office Zone. In November 2021, the City of Covina rezoned the site by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. AHMUOD allows a density of up to 40 dwelling units per acre. Applying the AHMUOD to the parcels will facilitate either an amenity-rich mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development in meeting the moderate or above-moderate income criteria. This area will benefit from the introduction of residential uses. The City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "K-2", and given the recent City's residential development trends, the City assumes that the

site can achieve at least 50 percent of the permitted density for the nine parcels that are less than 0.50 acre in size. The lot combination of these nine parcels yield 2.13 acres. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, the nine parcels within Area "K-2" can easily accommodate at least 38 new housing units. With respect to the site at 1257 W. San Bernardino that have a parcel size of 0.57 acre, staff assumes a 90 percent of the permitted density, which is 36 dwelling unit per acre in calculating the number of new units. The site at 1257 W San Bernardino can achieve 21 units for very low and low income criteria.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "K-2" are within a High Resource Area (Census Tract 06037405702) but do not fall within a Qualified Census Tract (QCT). Area "K-2" was analyzed to assess TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area "K-2" is well positioned to have lower and moderate-income residential development because of the proximity to amenities. Area "K-2" is half a mile from Lark Ellen Elementary School and Las Palmas Middle School. Area "K-2" fronts onto W. San Bernardino Road and is served by Foothill Transit major bus route (190) that heads to Baldwin Park Metrolink Station or West Covina Metrolink Station. The site is about half a mile from major commercial centers at W. San Bernardino Road and N. Azusa Ave.

Opportunity Area "K-3" – South Side of W. San Bernardino Road, East Side of N. Lark Ellen Avenue



Summary:

Site Addresses: 1274 W. San Bernardino Road, 312 and 306 N. Lark Ellen Avenue

APN Numbers: 8434-016-033, 8434-016-037, 8434-016-010 and 8434-016-011

General Plan Designation: GC, General Commercial

Zoning Classification: C-4 Commercial Zone (Highway) for 1274 W. San Bernardino Road, and C-P (AHMUOD), Commercial, Administrative, and Professional Office Zone and Affordable Housing Mixed-Use Overlay District for the three parcels off N. Lark Ellen Avenue

Acreage: Consolidation of the four parcels yields 0.93 acres combined

TCAC/HCD Resource Category: High

Estimated Housing Potential: 19 units

Qualified Census Tract: No

Description: Opportunity Area "K-3" comprises four parcels totaling 0.93 acres and is located on the south side of W. San Bernardino Road and the east side of N. Lark Ellen Avenue. The parcel at 1274 W. San Bernardino Road is developed with a self-service car wash facility built in 2003. The other two parcels front onto N. Lark Ellen are developed with single-family houses. The fourth parcel also fronts onto N. Lark Ellen, a small vacant remnant land adjacent to 312 N. Lark Ellen. The three parcels have the

same ownership (*Figure 1*) except for the corner parcel with the self-service car wash facility (*Figure 2*). All parcels in Area "K-3" are less than one acre in size. The single-family structures are more than 60 years old. The land-to-improvement ratio is low, less than one. The east side of the Area "K-3" is existing multi-family complexes, the west side is a Kindred Hospital and a multi-family complex outside of City limits, the south is an existing church, and the north is a commercial use and a condominium complex.

In November 2021, the City rezoned Area "K-3" by adding the Affordable Housing Mixed-Use Overlay District (AHMUOD) of up to 40 units per acre as a regulatory incentive to increase housing production. All the parcels have a land-to-improvement ratio of less than one, which indicates little investments in this area over the last several decades. The parcel at 1274 W. San Bernardino Road has experienced on-and-off criminal nuisance issues for the past decade. The City anticipates that the application of the Affordable Housing Mixed-use Overlay District for the four parcels will add value to the land that will entice housing development. Within half a mile from Area "K-3" is a recently approved 28-unit apartment project on 1.27 acres with the lot consolidation of four parcels. The project is currently in plan check. It demonstrated a local market trend of lot consolidation for housing development. The lot consolidation of Area "K-3" will yield a total of 0.93 acres. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "K-3" can easily accommodate at least 19 new housing units. The photos below illustrate the existing conditions of Area "K-3."

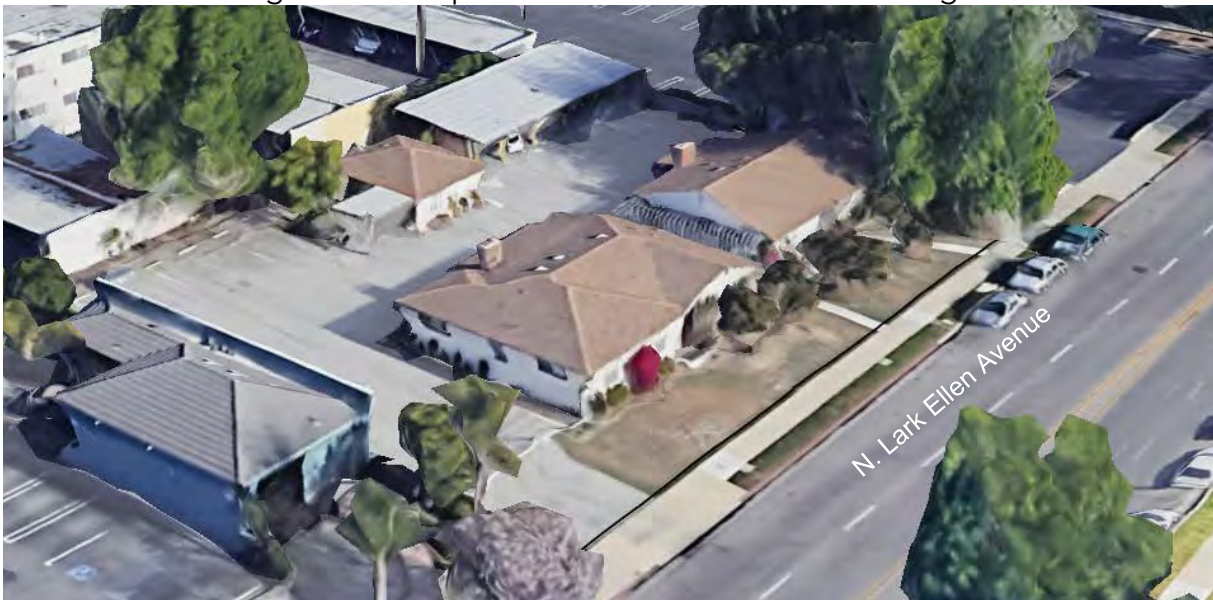


Figure 10. View of vacant parcel used for vehicular access and two parcels with Single Family structure.



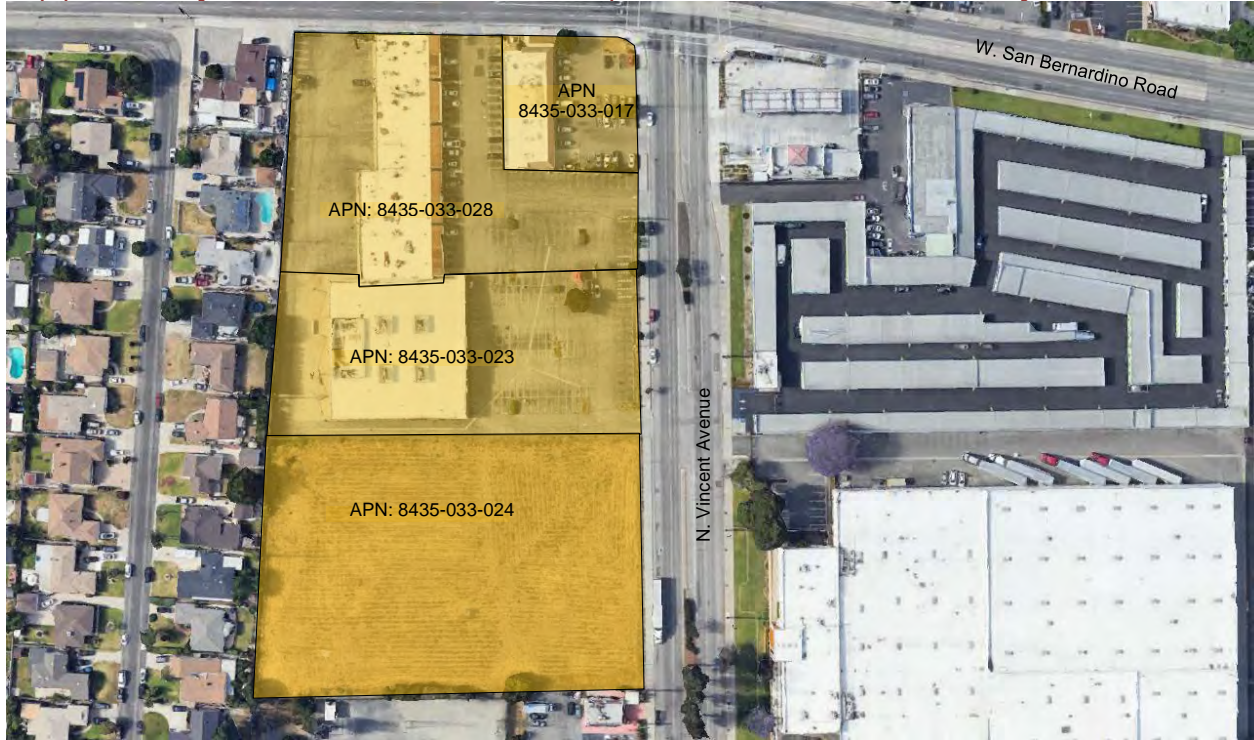
Figure 11. View of parcel (APN:8434-0126-033) which is currently in use as a self-service car wash.

Land Use Regulations: The City's General Plan Land Use Map shows that Area "K-3" is designated General Commercial, and the Zoning classification is C-4 Commercial Zone (Highway) for the parcel at 1274 W. San Bernardino Road, and C-P Commercial, Administrative, and Professional Office Zone for the three parcels at N. Lark Ellen Avenue. In November 2021, the City of Covina rezoned the site by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. AHMUOD allows a density of up to 40 dwelling units per acre. Applying the AHMUOD to the parcels will facilitate either a mixed-use project with ground floor commercial space and several stories above for residential units or 100 percent housing development in meeting the moderate and above-moderate income criteria. The City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "K-3", and given the recent City's residential development trends, the City assumes that the site can achieve at least 50 percent of the permitted density. The City's 50 percent assumption of the permitted density is equal to 20 dwelling units per acre; therefore, Area "K-3" can easily accommodate at least 19 new housing units. The density of 20 dwelling units per acre is considered appropriate in accommodating the development of housing units for moderate or above moderate-income households.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "K-3" are within a High Resource Area (Census Tract 06037405702) but do not fall within a Qualified Census Tract (QCT). Area "K-3" was analyzed to assess TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks, and transit. As a result of a preliminary review, Area "K-3" is well positioned to have lower and moderate-income residential development because of the proximity to amenities. Area "K-3" is half a mile from Lark Ellen Elementary School and Las Palmas Middle School. Area "K-3" fronts onto W. San Bernardino Road and is served by Foothill Transit major bus route (190) that heads to Baldwin Park Metrolink or West Covina Metrolink Commuter Rail Stations. The site is about a mile from major commercial centers at W. San Bernardino Road and N. Azusa Ave.

Opportunity Area "M" – Southwest quadrant of W. Arrow Hwy and N. Vincent Ave



Summary:

Site Addresses and APNs: 321 and 333 (8435-033-023, 024, and 028) N. Vincent, and 433 N. Vincent (8435-033-017)

General Plan Designation: General Commercial

Zoning Classification: C-2 Commercial Zone (Neighborhood Store) and Affordable Housing Mixed-Use Overlay District (AHMUOD)

Acreage: 6.89 acres

TCAC/HCD Resource Category: High

Estimated Housing Potential: 248 units

Qualified Census Tract: No

Description: Opportunity Area "M" comprises four parcels totaling 6.89 acres and is located in the southwest quadrant of W. Arrow Hwy and N. Vincent Ave. Two parcels are developed as a neighborhood center with an anchor store and an in-line commercial building. The building with the anchor space has been vacant for more than five years. More than one-third of tenant spaces for the in-line retail building are vacant. A third parcel is undeveloped. The fourth parcel, located at the corner, is developed with one building and has multiple tenants. The City's record shows the site was built in the 1967's, and the structures are over 40 years old. The site improvements, including the parking and landscaped areas, are poorly maintained. The land-to-improvement ratio is low, with an average of 3.0. None of the parcels have made any significant improvements. A Family Trust owns three parcels, and an individual owns the corner parcel. To the east of the site are old industrial buildings, a public storage place, and

gas stations. To the south of the site are strip commercial buildings and a Southern Edison (SCE) utility facility. To the north and west of the site are single-family residential uses but outside Covina city limits. Given the changing commercial market conditions with solid E-commerce, the site is primed to be redeveloped with a 100 percent housing project.



Figure 12. North East Birds Eye View of 4 Parcels in Opportunity Area "M" , on the corner of N. Vincent Ave and W San Bernardino Rd.



Figure 13. South East Street View of Opportunity Area "M" on N Vincent Avenue

Land Use Regulations: The City's General Plan Land Use Map shows that Area "M" is designated as General Commercial, and the Zoning classification is C-2 Commercial Zone. In November 2021, the City of Covina rezoned the site by adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" to provide flexibility in allowing housing development in the future. Adding the "Affordable Housing Mixed-Use Overlay District (AHMUOD)" is a "capture value" that increase the land value of the parcel, which

leads to housing opportunity. AHMUOD allows a density of up to 40 dwelling units per acre. Applying the AHMUOD to the parcels will facilitate a 100 percent housing development with at least a minimum of 20 percent of the total units meeting the household income criteria. This area will benefit from the introduction of residential uses. Given the larger size of Area "M," the City anticipates the site will attract housing development during the 2021-2029 planning period.

Capacity Assumptions: In determining the potential and realistic unit capacity for Area "M," the City assumes 100 percent of the land area could accommodate new housing development. Given the recent City's residential development trends, the City assumes that the site can achieve up to 90 percent of the maximum permitted density of 40 dwelling units per acre. An example of a recent multi-family residential development in the City is Covina Bowl located at the southwest corner of W. San Bernardino Road and N. Rimsdale Avenue. This project (Covina Bowl) consisted of multi-phased construction of 132 condominium units and at a density of 30 dwelling units per acre. The City's 90 percent assumption of the permitted density is equal to a density of up to 36 dwelling units per acre, therefore Area "M" can realistically accommodate at least 248 new housing units. The density of 36 dwelling units per acre is considered appropriate in accommodating the development of housing units for very low and low-income households.

Financial Potential: According to the 2023 TCAC/HCD Opportunity Map, the parcels in Area "M" are within a High Resource Area (Census Tract 06037405701) but do not fall within a Qualified Census Tract (QCT). Area "M" was analyzed to assess TCAC amenities scoring based on proximity to schools, pharmacies, grocery stores, medical offices, parks and transit. As a result of a preliminary review, Area "M" is well positioned to have lower and moderate-income residential development because of the site's size and the proximity to amenities. Area "M" is within half a mile from Lark Ellen Elementary School and Las Palmas Middle School. Area "M" fronts on to W. San Bernardino Road and is served by Foothill Transit major bus route (190) that heads to Baldwin Park Metrolink Station or West Covina Metrolink Station. The site is within one mile of major commercial centers at W. San Bernardino Road and N. Azusa Avenue.

Appendix C Public Participation Summary

State law requires cities to make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element. This appendix describes the City’s efforts to involve low- and moderate-income households and organizations that represent them in the Housing Element update process. A summary of public comments and how they were considered and incorporated into the element is also provided.

Housing Element Website

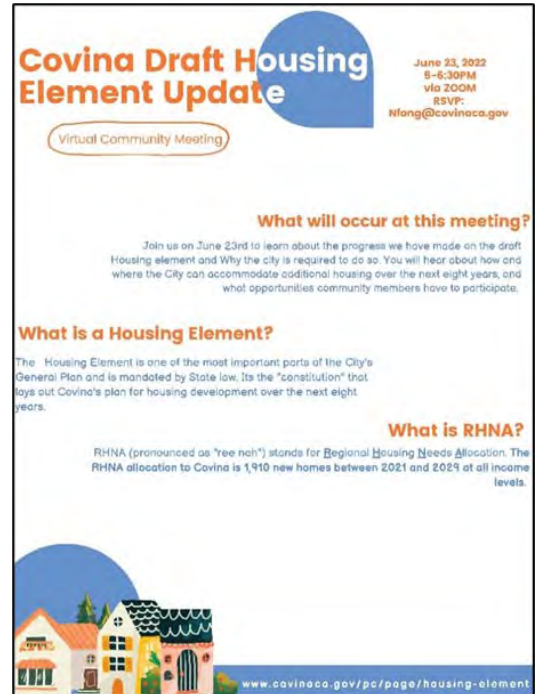
Upon commencement of the Housing Element update, the City created a dedicated Housing Element website (<https://covinaca.gov/pc/page/housing-element>) where documents, meeting notices, and reference materials were posted.

Stakeholder List

To ensure that all interested parties were invited to participate was preparing an update to the City’s housing stakeholder list (Table C-1). The stakeholder list included all persons and organizations who were on the 5th cycle Housing Element notification list, and the list was updated to include email addresses when available. In addition, all parties who submitted comments during the process were added to the stakeholder list, and the City’s Housing Element website included a link for interested parties to request that they be added to the stakeholder list.

FAQ

Early in the Housing Element update process a *Frequently Asked Questions* was prepared and posted on the City website (see copy below).



Public Meetings

The City initiated the Housing Element update process in early 2021 and a joint City Council/Planning Commission public workshop was held on September 21, 2021 to discuss housing issues in Covina.

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. Notices were available in both English and Spanish (see examples below).

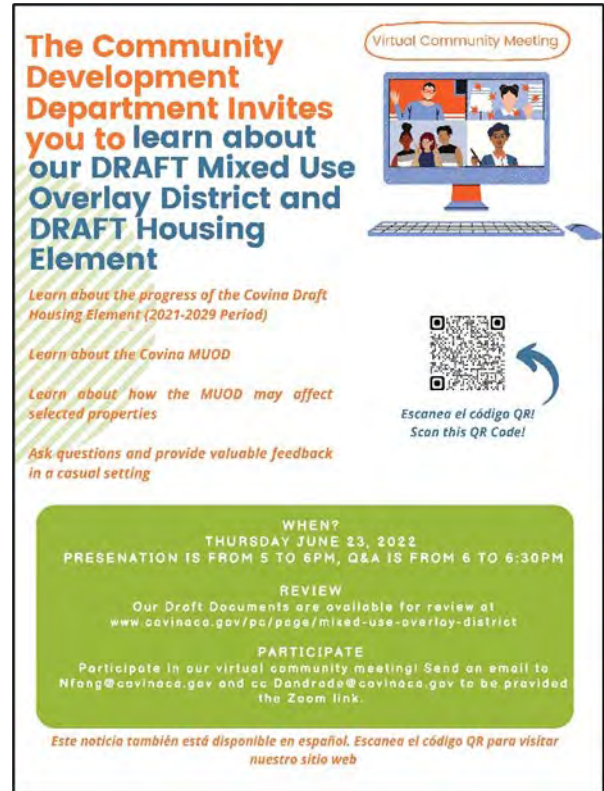
The initial Draft 2021-2029 Housing Element was made available for review at City Hall and posted on the City website on November 9, 2021. Direct mail notices of availability of the draft Housing Element were sent to the list of stakeholders, which includes housing developers and organizations representing the interests of lower-income persons and special needs groups in Covina.

The Draft Housing Element was submitted to HCD for review on November 24, 2021, and HCD’s comments were received on January 27, 2022. After receiving HCD comments on the draft Housing Element , a study session was conducted by the Planning Commission on April 12, 2022 and a public workshop was held on June 23, 2022 to solicit additional public comments. A revised draft Housing Element was then prepared and posted for public review on September 5, 2022.

Public hearings were conducted by the Planning Commission on September 13 and 27, 2022 to review public comments and the revised draft Housing Element. A proposed final Housing Element was then prepared and made available for public review on October 5, 2022. A public hearing was conducted by the City Council on October 18, 2022 to receive public comments and consider adoption of the Housing Element.

How Public Comments Have Been Incorporated into the Housing Element

Public comments during the Housing Element update process as well as how those comments have been addressed in the Housing Element are summarized in Table C-2 below. In addition to comments from interested stakeholders, the City



provided a summary of HCD comments and Housing Element revisions in response to those comments at the Planning Commission and City Council public hearings, as well as to HCD along with a copy of the adopted Housing Element.

Continued Public Involvement in Housing Issues in Covina

To ensure the success of Covina’s housing policies and programs throughout the planning period, the City will continue to engage the community and solicit suggestions. Specific activities to be carried out include the following:

- Review the City’s Housing Element Annual Progress Report each year at a City Council public meeting
- Ensure that organizations representing the interests of lower-income households and persons with special needs are included in the City’s notification list for matters involving land use and housing policies and programs
- Utilize social media to publicize information on fair housing and landlord/tenant services available through the Housing Rights Center.

**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.

...

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

Comment	Response
The City is taking a good approach to housing problems. Housing cost is affected by the increasing cost of labor and materials, which the City has no control over.	Many factors affecting housing cost are beyond the control of local governments; however, the City is pursuing actions to reduce regulatory constraints that will help to increase the availability of housing and limit cost increases.
Has the City considered the impacts of thousands more housing units and higher density on current residents?	The State Legislature has declared there is a housing crisis in California, and every city is required to take proactive steps to encourage housing production. The programs contained in the Housing Element are intended to address the housing crisis to the extent the City has the ability to do so. Cities that do not comply with State requirements are subject to a number of potential consequences including fines, litigation and other court-imposed penalties.
The City should consider an inclusionary housing program	"Inclusionary housing" refers to a requirement that a portion of new housing is made available at affordable rents or prices. There are valid arguments among experts for and against such policies, and each city must evaluate whether inclusionary requirements are appropriate.
If a site is listed in the inventory, is it required to be developed for affordable housing?	No, the sites inventory only describes where additional housing could be built based on zoning regulations. Property owners will decide if and when development occurs. The City or the State cannot force property owners to develop their property for housing.
The sites inventory should include the HCD-recommended buffer of at least 15-30% extra capacity in order to avoid violating the No Net Loss requirement	As noted in Appendix B, the sites inventory includes conservative assumptions regarding the number of potential housing units to ensure a buffer above the RHNA.
Lower-income sites should be located in high opportunity areas to affirmatively further fair housing.	As noted in the sites inventory and the AFFH analysis, all of the sites are located in areas identified by TCAC as high or moderate resource.
Housing element updates should use an HCD-recommended "safe harbor" methodology for forecasting future ADU production.	The ADU estimate in the sites inventory (Appendix B) is based on HCD methodology.
The Southwest Regional Council of Carpenters recommends that the City require housing projects to require local hire and use of a skilled and trained workforce to build such projects.	The City appreciates SRCC's desire to maximize the use of union labor in housing developments and the potential air quality benefits of local hire policies. In response to this comment the Planning Commission recommended that the City Council consider a local hire policy.
Development should not permanently displace current residents. Housing replacement programs, temporary housing vouchers, right of return, and demolition controls will create stability for renters while allowing new homes to be built for new households and to accommodate the growth associated with RHNA. In your sites inventory and rezoning programs, you should prioritize development on sites with owner-occupied housing & commercial uses over those with	As noted in Appendix B (Sites Inventory) very few of the sites identified for future housing development are occupied by residential uses; therefore, minimal displacement of existing residents will occur. In rare instances where existing housing units could be displaced, appropriate provisions will be required consistent with State law (see Program 2.1).

Comment	Response
existing rent-controlled apartments or other rental housing with lower income residents.	
The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.	The Housing Element supports home ownership through first-time homebuyer programs (Program 3.1) as well as through the expansion of housing and mixed-use development opportunities (Programs 2.1 and 2.2).
Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity. This density should be emphasized around jobs and transit and should go beyond the Mullin density in those areas.	As described in the Constraints analysis and Appendix B (Sites Inventory), development standards such as height and FAR are appropriate to facilitate development at the densities assumed in the sites inventory (Programs 2.1, 2.2, 4.3).
Allow residential to be built in areas that are zoned for commercial use.	As described in Program 2.1 and Appendix B (Sites Inventory) the City is preparing a new Mixed Use Overlay zone where higher-density residential development is proposed in areas currently zoned only for non-residential use (Programs 2.1).



February 28, 2022

Policy Recommendations for 6th Cycle Housing Element

Dear Planning staff:

YIMBY Law submits this letter to share our policy goals and recommendations for the Policies and Programs section of your Housing Element. We appreciate the opportunity to participate in the Housing Element process.

The Policies and Programs section of the city’s Housing Element must respond to data, analysis and findings presented in the Housing Needs section. We repeatedly see findings that housing prices are high, segregation exists, and there is a lack of housing for special populations, but the Policies and Programs don’t respond to these findings or try to change outcomes. The overview of the city’s housing environment should set the scene, and the policies and programs should explain what the city is going to do to fix it.

Our policy goals are as follows:

Affirmatively Furthering Fair Housing

- 1. Prioritize rezoning in high resource, historically exclusionary neighborhoods.** Many of the highest resource neighborhoods with the best access to jobs, good schools, and other amenities have histories of exclusion which are still reflected in their zoning. Cities should rezone to allow more housing opportunities in those neighborhoods, particularly those with low Vehicle Miles Traveled, as part of their

Housing Elements.

- 2. Establish a strong tenant protection ordinance so that new housing benefits everyone.** Development should not permanently displace current residents. Housing replacement programs, temporary housing vouchers, right of return, and demolition controls will create stability for renters while allowing new homes to be built for new households and to accommodate the growth associated with RHNA. In your sites inventory and rezoning programs, you should prioritize development on sites with owner-occupied housing & commercial uses over those with existing rent-controlled apartments or other rental housing with lower income residents.

- 3. Support homeownership opportunities for historically excluded groups.** Homeownership continues to be a path to building financial security and inter-generational wealth, which has been systematically denied to many Americans. As a society, we need to make this right by intentionally offering opportunities to communities who have been excluded. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.

Site Capacity

- 4. Adequately plan for density.** Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity. Housing will not be feasible if you have a high density paired with low height limits. This density should be emphasized around jobs and transit and should go beyond the Mullin density in those areas.

- 5. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.** Not every site will be developed at maximum density during the eight-year planning period. Identify an ample amount of opportunity sites and zone the sites to accommodate lower-income housing types (usually a statutory minimum of 30 dwelling units per acre) to give the city the best chance at meeting its RHNA.

6. **Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.** Likelihood of development is a measure of the probability of an inventory site being developed during the planning period. The median likelihood of development across the state is 25%, meaning only one of every four sites will likely be developed during the planning period for the median city. Incorporating the likelihood of development into the zoned capacity will set the city up to successfully achieve their RHNA, making the housing element less of a paper exercise and more of an actionable, functional document.

Accessory Dwelling Units

7. **Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.** We highly recommend complying with HCD's standards of using one of its "safe harbor" methodologies to anticipate future ADU production. However, if the city is optimistic about ADU growth, then creating an automatic mid-cycle adjustment will automatically facilitate alternative housing options (i.e., a rezoning program, removing development constraints, ADU incentives, etc.) if the city falls behind the estimated ADU production.
8. **Incentivize new ADUs, including those that are rent-restricted for moderate- or lower-income households or that are prioritized for households with housing choice vouchers.** Consider offering low- or no-interest loans, forgivable loans, impact fee waivers for ADUs that are 750 square feet or larger, allowances to facilitate two-story and second-story ADU construction, etc.

Zoning

9. **Allow residential to be built in areas that are zoned for commercial use.** There are a myriad of ways to do this, but a housing overlay is one common policy. Additionally, consider eliminating new commercial space in mixed-use developments where there is not a strong demand or there is otherwise a glut of commercial space that is unused or frequently vacant.
10. **Allow flexibility in inclusionary zoning.** Cities should require different percentages for different AMI levels. Additionally, we urge cities to incentivize land

dedication to affordable developers in order for market-rate developers to meet their inclusionary requirements. Avoid getting trapped into thinking that the affordable units must be “sprinkled throughout” the market-rate units, or require the market-rate units to look exactly the same as the affordable ones. This should be balanced against not locating all of the affordable units in one place and ghettoizing neighborhoods by creating or perpetuating racially concentrated areas of poverty.

Better Entitlement Process & Reducing Barriers to Development

- 11. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.** A discretionary process for housing development creates uncertainty and adds to the cost of construction. For example, multi-family housing should not require a conditional use permit or city council approval unless the builder is asking for unique and extraordinary concessions. Right-sizing governmental constraints, entitlement processes, and impact fees will help the city successfully meet its RHNA.
- 12. Reduce parking standards and eliminate parking minimums.** Minimum parking requirements are a major constraint on housing, especially for lower cost housing types. They can cost in excess of \$30,000 per spot and can raise rents by as much as 17%, and eliminating them is particularly important for smaller & other spatially constrained sites. Consider adopting a parking maximum.
- 13. Cap fees on all new housing.** Most construction costs are outside the City's control, but reducing impact fees can demonstrate that a city is serious about building new housing. At a minimum, cities should delay the collection of impact fees until the issuance of the certificate of occupancy to reduce financial impacts on new housing and make the units cheaper by not asking the developer to carry impact fee charges or debt throughout the construction phase.
- 14. Provide local funding.** One of the largest barriers to building new affordable homes is the lack of city/county funds available to assemble sites, provide gap funding, and to pay for dedicated staff. Without new funding, especially at the local level, we will not be able to build more affordable homes. There are three

new revenue streams that should be considered: 1) **Transfer tax**, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) **Vacancy tax** may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) **Commercial linkage** fees should be adopted or revisited for increases on new commercial developments.

We urge you to include these policies in your 6th cycle Housing Element.

Best regards,

Sonja Trauss

Executive Director

YIMBY Law

sonja@yimbylaw.org



CALIFORNIANS FOR HOMEOWNERSHIP

MATTHEW GELFAND, COUNSEL
MATT@CAFORHOMES.ORG
TEL: (213) 739-8206

March 24, 2022

Brian K. Lee
City of Covina
Email: blee@covinaca.gov

RE: Covina’s failure to timely adopt a Sixth Cycle Housing Element.

Dear Brian K. Lee:

Californians for Homeownership is a 501(c)(3) non-profit organization that uses impact litigation to address California’s housing crisis. We are monitoring local compliance with the law governing housing elements. Our understanding is that the City has not adopted a sixth cycle housing element, which it was required to do by October 15, 2021.¹ It also missed the second compliance deadline of February 12, 2022, subjecting it to additional penalties.² We are currently preparing for litigation against cities that have not timely adopted housing elements, like yours.

In light of the City’s failure to timely adopt its housing element, our organization could immediately sue the City under Code of Civil Procedure Section 1085 to compel it to adopt a compliant housing element.³ As a result of this litigation, in addition to being ordered to adopt a housing element on a short timeline,⁴ the City could also face a number of serious penalties. For example, the court could suspend all non-residential permitting,⁵ or could judicially approve housing development projects within the City.⁶ And the court could impose these penalties while the litigation is pending, even before reaching a final decision.⁷ Housing element litigation is given priority in the court system,⁸ and a successful plaintiff can obtain attorneys’ fees under Code of Civil Procedure Section 1021.5. Indeed, in a recent case involving the City of Huntington Beach’s housing element, a court awarded another non-profit organization over \$3.5 million in fees.⁹

The purpose of this letter is to offer the City a pathway to avoid immediate litigation by our organization. Enclosed is an Acknowledgment that sets forth some of the penalties to which the City is currently subject in light of the City’s failure to adopt a housing element. If the City signs and returns the Acknowledgment, we will not initiate litigation against the City at this time.

¹ Gov. Code § 65588(e)(3).
² Gov. Code §§ 65583(c)(1)(A), 65583.2(c), and 65588(e)(4)(C).
³ Gov. Code §§ 65587, 65751.
⁴ Gov. Code § 65754.
⁵ Gov. Code § 65755(a)(1).
⁶ Gov. Code § 65755(a)(4).
⁷ Gov. Code § 65757.
⁸ Gov. Code § 65752.
⁹ <https://www.communitylegalsocal.org/kennedy-commission-awarded-3-5-million-in-attorneys-fees-for-advocacy-in-huntington-beach-low-income-housing-case/>

525 S. Virgil Avenue
Los Angeles, CA 90020



March 24, 2022
Page 2

We ask that you return the Acknowledgement by April 1, 2022. If you decline to do so, understand that we may initiate litigation against the City, using the City's refusal to acknowledge these basic requirements of state housing law to demonstrate the existence of a dispute necessitating judicial intervention. As part of the litigation, we would likely seek a judicial declaration that the City is subject to the same penalties described in the Acknowledgment, among other remedies. We have dedicated in-house resources sufficient to maintain at least 10 simultaneous housing element lawsuits as part of our commitment to enforcing this important aspect of state housing law.

Finally, while we acknowledge that it takes a significant dedication of resources to comply with the requirements of state housing element law, it is worth noting that many cities throughout the Southern California (SCAG) region, both big and small, have already adopted their sixth cycle housing elements after fully complying with state law mandates governing consultation with the public and the state Department of Housing and Community Development (HCD). We believe that, with appropriate planning, all of the SCAG cities could have adopted their housing elements by the October 15, 2021 deadline. For this reason, it would not be productive to respond to this letter by listing the steps the City has taken towards adoption, or the obstacles it has faced. Instead, we simply ask that the City sign the Acknowledgment. There are no statutory exceptions to the penalties identified in the Acknowledgment, and HCD does not have the authority to excuse the City from them.

We look forward to receiving the signed Acknowledgment. If you would like to discuss any of this with me, please do not hesitate to give me a call at (213) 739-8206.

Sincerely,



Matthew Gelfand

cc: Candice Lee, Esq., City Attorney (by email to clee@rwglaw.com)

ACKNOWLEDGMENT

The City of Covina hereby acknowledges that it has not timely adopted a sixth cycle revised housing element of its general plan within the deadline set forth in Government Code Section 65588, and that its housing element is therefore not in substantial compliance with Article 10.6 of the Government Code. As a result, the City is subject to the following:

1. Pursuant to Government Code Sections 65583(e)(1)(A), 65583.2(e), and 65588(e)(4)(C), the City will be required to complete any rezoning required under housing element law in connection with the City’s sixth cycle housing element by October 15, 2022.
2. The City is currently prohibited from rejecting housing development projects based on subdivisions (d)(1) and (d)(5) of the Housing Accountability Act (HAA), Government Code Section 65589.5. The City acknowledges that this means that, unless another exception within subdivision (d) applies, the City is prohibited from using its general plan and zoning standards to reject a proposal that meets the affordability requirements described in subdivision (h)(3) of the HAA.

The public, including without limitation any applicant to develop any project involving residential units, may rely on this Acknowledgment as the City’s binding commitment to comply with the provisions of state law described above.

DATED: _____, 2022 CITY OF COVINA

By: _____
 [Signature]

 [Name]

Its: _____
 [Title]



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Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

April 12, 2022

City Clerk's Office
City of Covina
125 E. College Street
Covina, CA 91723

Em: cityclerk@covinaca.gov

Em: planning@covinaca.gov

RE: City of Covina's 6th Cycle Housing Element Update.

Dear Honorable Commissioners,

On behalf of the Southwest Regional Council of Carpenters (“**Southwest Carpenter**” or “**SWRCC**”), my Office is submitting these comments for the City of Covina’s (“**City**”) April 12, 2022 Planning Commission Meeting for the draft 2021-2029 update to the City’s General Plan Housing Element (“**Project**”).

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states, including California, and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

SWRCC expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

SWRCC incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected

City of Covina – 6th Cycle Housing Element Update
April 12, 2022
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to the Project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, SWRCC requests that the City provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (“CEQA”), Cal Public Resources Code (“PRC”) § 21000 *et seq*, and the California Planning and Zoning Law (“**Planning and Zoning Law**”), Cal. Gov’t Code §§ 65000–65010, California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

The City should require the use of a local skilled and trained workforce to benefit the community’s economic development and environment. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

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Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

. . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.¹

Local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area’s jobs-housing balance, decreasing the amount of and length of job commutes and their associated greenhouse gas emissions. Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the “[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component” can result in air pollutant reductions.²

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to “promote local hiring . . . to help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions.”³

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City “c]ontribute to the stabilization of regional construction markets by spurring applicants of

¹ California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>.

² South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>

³ City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf.

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housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint labor-management training programs, . . .⁴ In addition, the City of Hayward requires all projects 30,000 square feet or larger to “utilize apprentices from state-approved, joint labor-management training programs.”⁵

Locating jobs closer to residential areas can have significant environmental benefits. . . . As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.⁶

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.⁷ Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than

⁴ City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* <https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf>.

⁵ City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

⁶ California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* <https://cprroundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

⁷ Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? *Journal of the American Planning Association* 72 (4), 475-490, 482, *available at* <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.

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3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

Sincerely,



Mitchell M. Tsai
Attorneys for Southwest Regional
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

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Appendix D Fair Housing Assessment

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

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

1. Outreach

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

Over the course of the Housing Element update process the City conducted a series of public meetings. Public notice of each meeting was posted on the City's dedicated Housing Element website and was also sent directly to persons and organizations on the stakeholder list. Public meetings were held both online and in person to encourage those with mobility difficulties to

participate. Agendas and other information for each meeting was posted on the City website to allow interested stakeholders to access to this information throughout the process. Interested persons were also encouraged to provide input or ask questions via telephone or email. Please refer to Appendix C for additional information regarding the outreach efforts and how public input was incorporated into the Housing Element. Information was made available in both English and Spanish.

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

To encourage continuing stakeholder involvement in local housing issues throughout the planning period, Program 5.1 includes a commitment to conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

2. Fair Housing Assessment

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

Data Sources

This analysis incorporates State and Federal data sources as well as local data and knowledge, where available. The primary Federal data sources include the U.S. Census and the U.S. Department of Housing and Urban Development (HUD). The primary State data source is the California Department of Housing and Community Development (HCD) AFFH Data and Mapping Resources website (<https://affh-data-resources-cahcd.hub.arcgis.com/>). Additional data is published by The Urban Displacement Project (UDP), a research and action initiative of the University of California Berkeley and the University of Toronto. UDP conducts community-centered, data-driven, applied research toward more equitable and inclusive futures for cities. Its research aims to understand and describe the nature of gentrification, displacement, and exclusion, and also to generate knowledge on how policy interventions and investment can support more equitable development (<https://www.urbandisplacement.org/>).

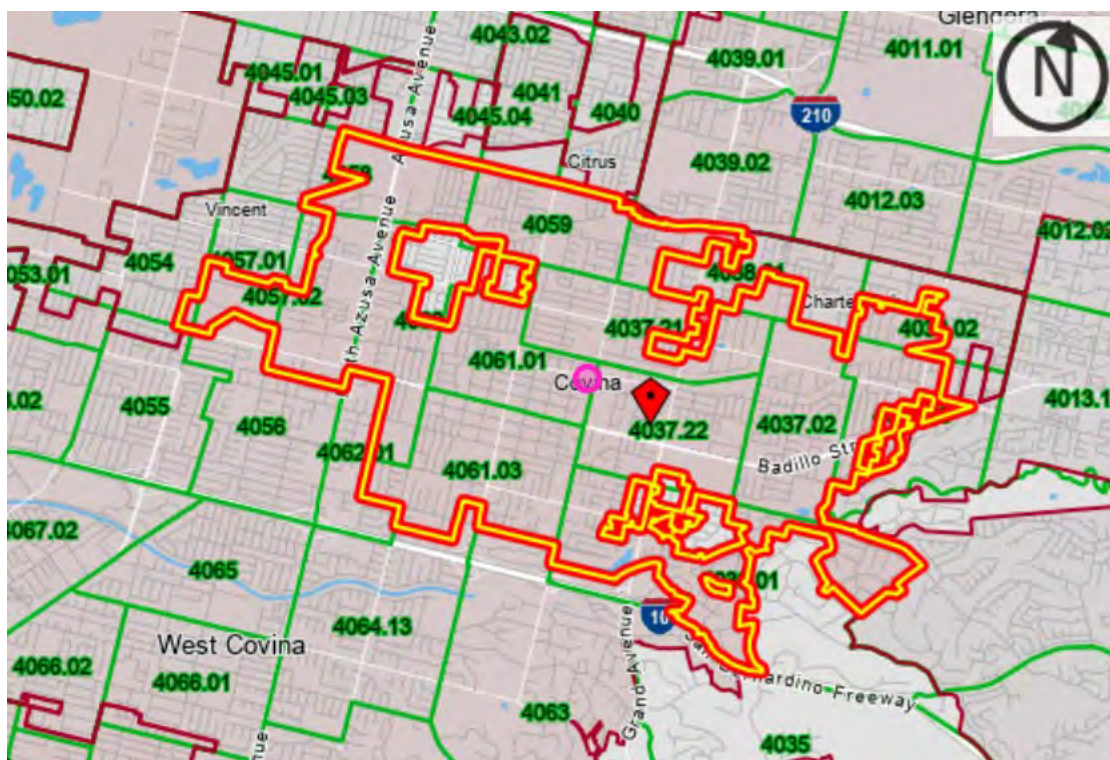
Most of the maps provided in this appendix are based upon data generated at the census tract level. Figure D-1 shows the census tracts that are entirely or partially within the Covina city boundaries.

The primary local data sources are the Los Angeles County Development Authority (LACDA) and the City of Covina. The City of Covina is a participating city in the Los Angeles County Community Development Block Grant (CDBG) Program. As part of the CDBG Urban County program, Los Angeles County and the LACDA prepared an Analysis of Impediments to Fair Housing Choice (AI) in 2018. The AI utilized a variety of community participation tools to evaluate local fair housing issues including interviews, focus groups, community meetings and a fair housing survey. Issues addressed in the outreach efforts included disabilities and access, education, employment, transportation, and healthy neighborhoods. Findings from this outreach program are incorporated into this analysis of fair housing issues, contributing

factors and recommended actions. No local demographic or housing needs data specific to the City of Covina were reported in the AI; therefore, area-wide data, analysis and findings are incorporated where relevant.

Other local data and knowledge was obtained through the public participation program for the City's Housing Element update, as discussed in the Outreach section above and Appendix C of this document, and through the local knowledge and analysis of City staff.

**Figure D-1
Census Tracts – Covina**



A. Fair Housing Enforcement and Outreach Capacity

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

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

Locally, the City partners with the Housing Rights Center (HRC) to investigate fair housing complaints. HRC is a non-profit, approved by HUD, that works with local government offices to ensure Fair Housing laws are upheld. HRC provides various services to Los

Angeles County stakeholders, including tenant/landlord mediation, credit counseling, and fair housing training and workshops.

During the 2020-2021 fiscal year, the HRC and Fair Housing Council reported 12 discrimination inquiries filed by residents of Covina. Of those, 9 were filed by persons with a physical disability and 3 were filed by persons with a mental disability. In addition, 46 landlord/tenant inquiries were filed, of which 23 were reported as resolved.

The City does not have any pending lawsuits, enforcement actions, judgements, settlements, consent decrees or findings related to fair housing and civil rights. For federally funded Urban County programs, Covina has committed to complying with the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§3601 et seq., by ensuring that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status (having children under age 18), via its existing housing policies and future programs listed in the 2021-2029 Housing Element. Los Angeles County Development Authority (LACDA) policy prohibits discrimination in any aspect of housing on the basis of race, color, religion, national origin, disability, familial status, or sex. As discussed above, the City partners with the HRC to conduct fair housing enforcement and outreach as well as provide housing services to residents on behalf of the City ensuring that Covina remains compliant with all governmental fair housing laws. However, on its own, the City continues to provide outreach/educational materials on State and federal fair housing laws and directs complaints of housing discrimination to appropriate enforcement agencies (i.e., State Department of Fair Employment and Housing, Housing Rights Center, and HUD), as well as continues to process and approve applications for Reasonable Accommodation for persons with disabilities where such accommodation may be necessary to ensure equal housing opportunities. The City also provides information to assist community members on the City's website and at municipal facilities. These City actions, along with the proactive removal and/or reduction of regulatory constraints to housing development via amendments to the City Zoning Code aids in ensuring that Covina remains compliant with federal and State fair housing laws including Sections 65008 and 8899.50 of the California Government Code.

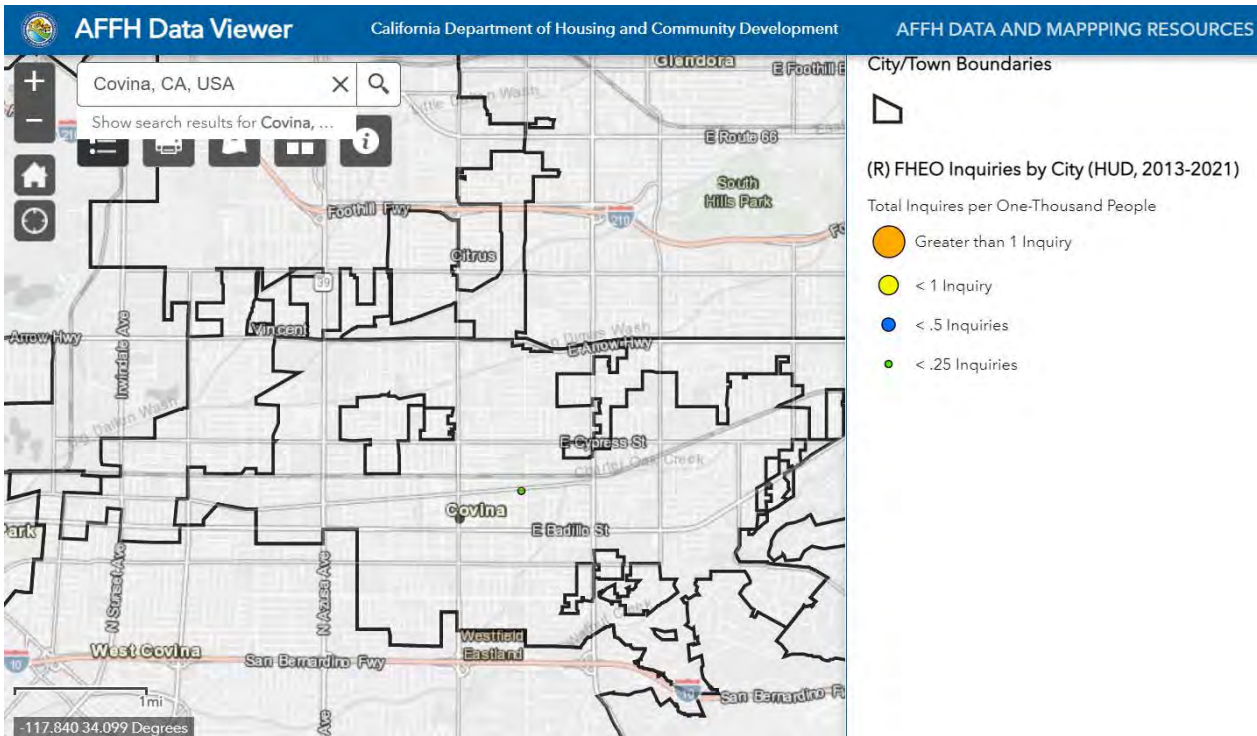
The City provides residents with fair housing information by posting links to fair housing organizations on the City's website (<https://covinaca.gov/rdh/page/legal-resources>). These resources include:

- Institute for Multicultural Counseling & Education Services (IMCES)
- Southern California Housing Rights Center
- Neighborhood Legal Services
- Legal Aid Foundation of Los Angeles
- National Domestic Violence Hotline
- Center For Civic Mediation
- Civic Mediation Project
- Immigration Legal Assistance Project
- AIDS Legal Services Project
- Domestic Violence Legal Services Project
- Indigent Criminal Defense Appointments Program
- State Bar of California

Program 5.1 is included in the Housing Action Plan (Chapter VI) to continue to ensure that fair housing information and links to service providers are available through the City's website, as well as the City's promotion and distribution of fair housing and anti-displacement resources to residents, especially those at-risk of displacement.

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

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



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

B. Patterns of Integration and Segregation

1) Race and Ethnicity

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

Figure D-2
Racial Demographics - Covina

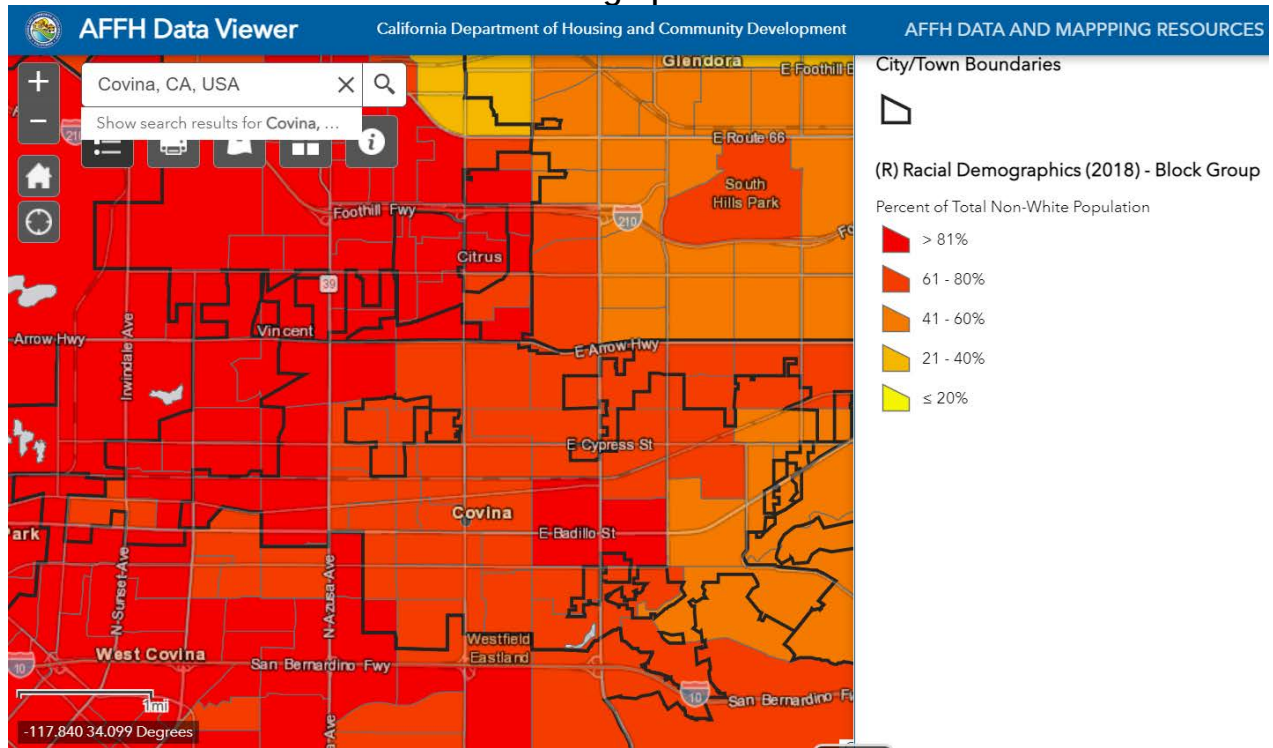
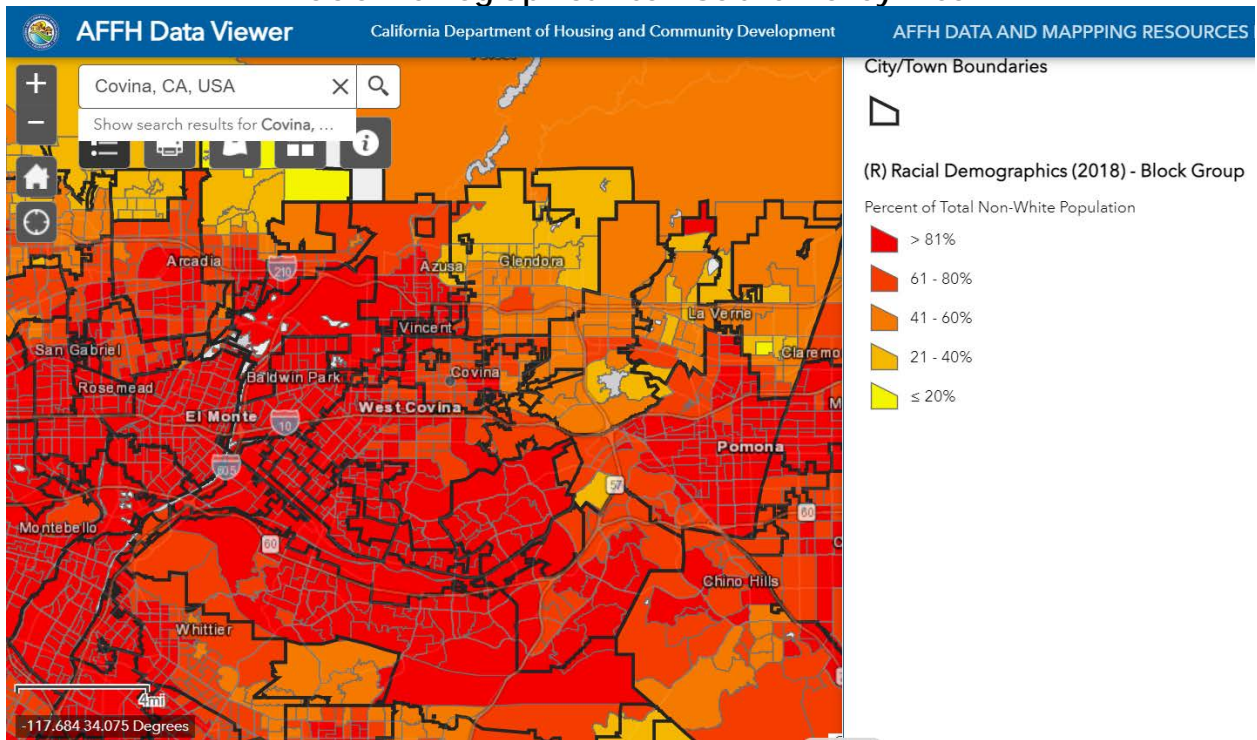


Figure D-3
Racial Demographics – San Gabriel Valley Area

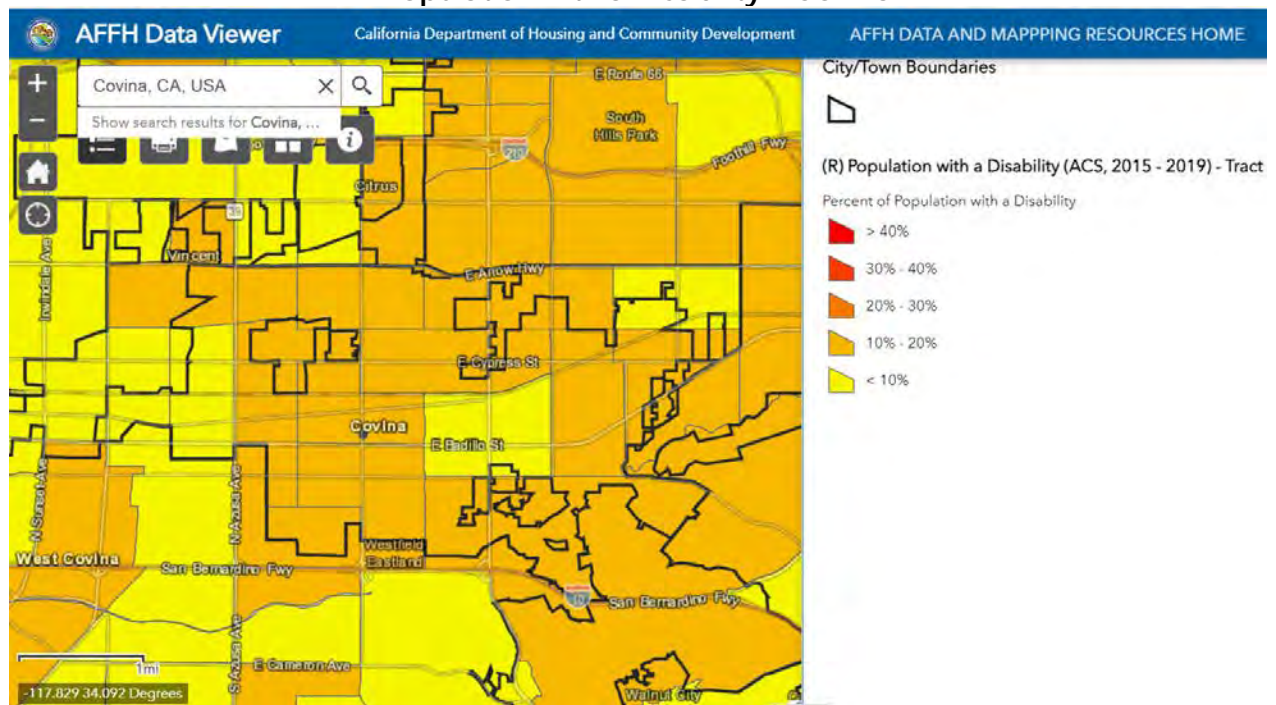


2) Persons with Disabilities

As shown on 0, in most areas of Covina 10 to 20% of residents have a disability, although some census tracts in the western and central portions of the city show lower disability rates less than 10%.

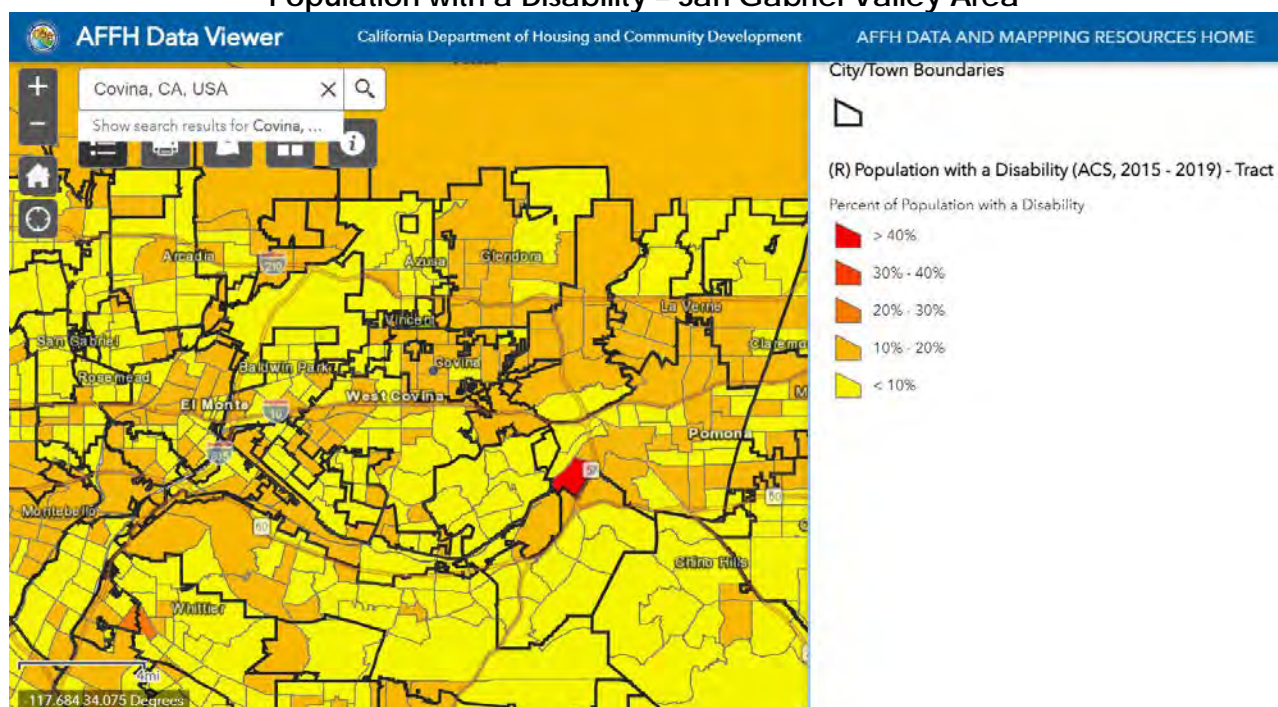
Additional information regarding persons with disabilities by disability type in Covina is provided in Table III-19 and Table III-20 of the Housing Needs Assessment. Some individuals may experience more than one disability, and some disability types are not recorded for children below a certain age. The California Department of Developmental Services (DDS) estimates that there are approximately 950 persons with developmental disabilities within the ZIP code areas that encompass the City of Covina.

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



Disability data for the larger San Gabriel Valley area are shown in 0. This map shows that disability rates in Covina are generally similar to the region as a whole.

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



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

3) Familial Status

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

Single-parent households are also protected by fair housing law. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. As discussed in Table III-24 in the Housing Needs Assessment, approximately 17% of Covina households are female-headed (compared to 14% in the SCAG region), 7% are female-headed and with children (compared to 7% in the SCAG region), and 1% are female-headed and with children under 6 (compared to 1% in the SCAG region). 0 shows the percentage of children living in married couple households in Covina while 0 shows similar data for the San Gabriel Valley region as a whole.

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

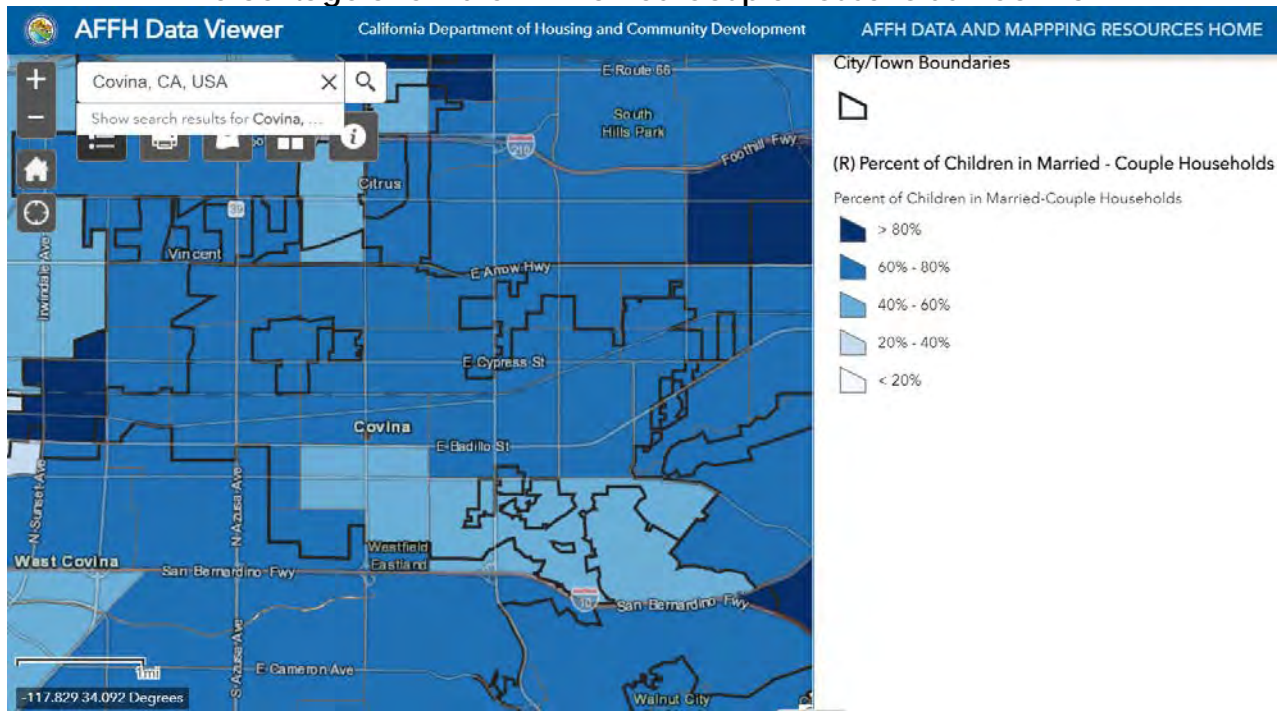
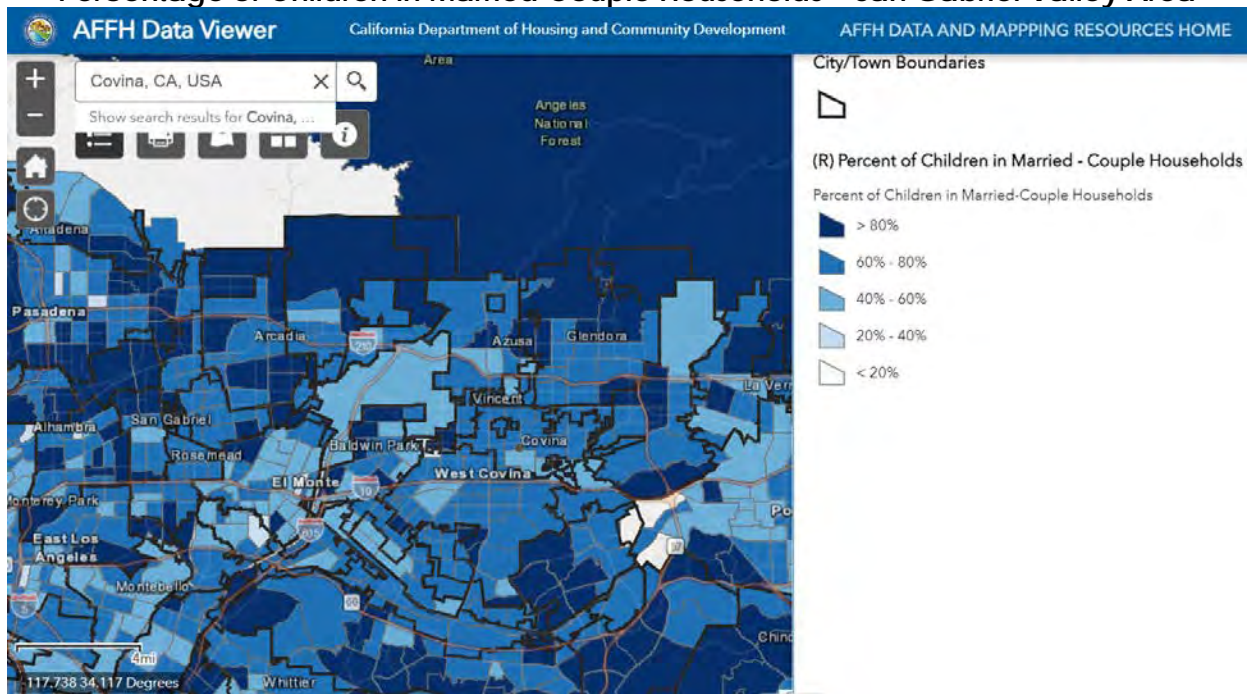


Figure D-7
Percentage of Children in Married Couple Households – San Gabriel Valley Area



4) Income

Identifying low/moderate-income (LMI) areas is an important aspect in understanding patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). Figure D-8 shows that the highest concentrations of LMI households (50-75%) are found in the central area of the city, although similar LMI percentages are also seen in other areas. There are no tracts where the LMI percentage is higher than 75%, although a few areas have LMI percentages that are less than 25%.

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

Figure D-8
Low/Moderate Income Population – Covina

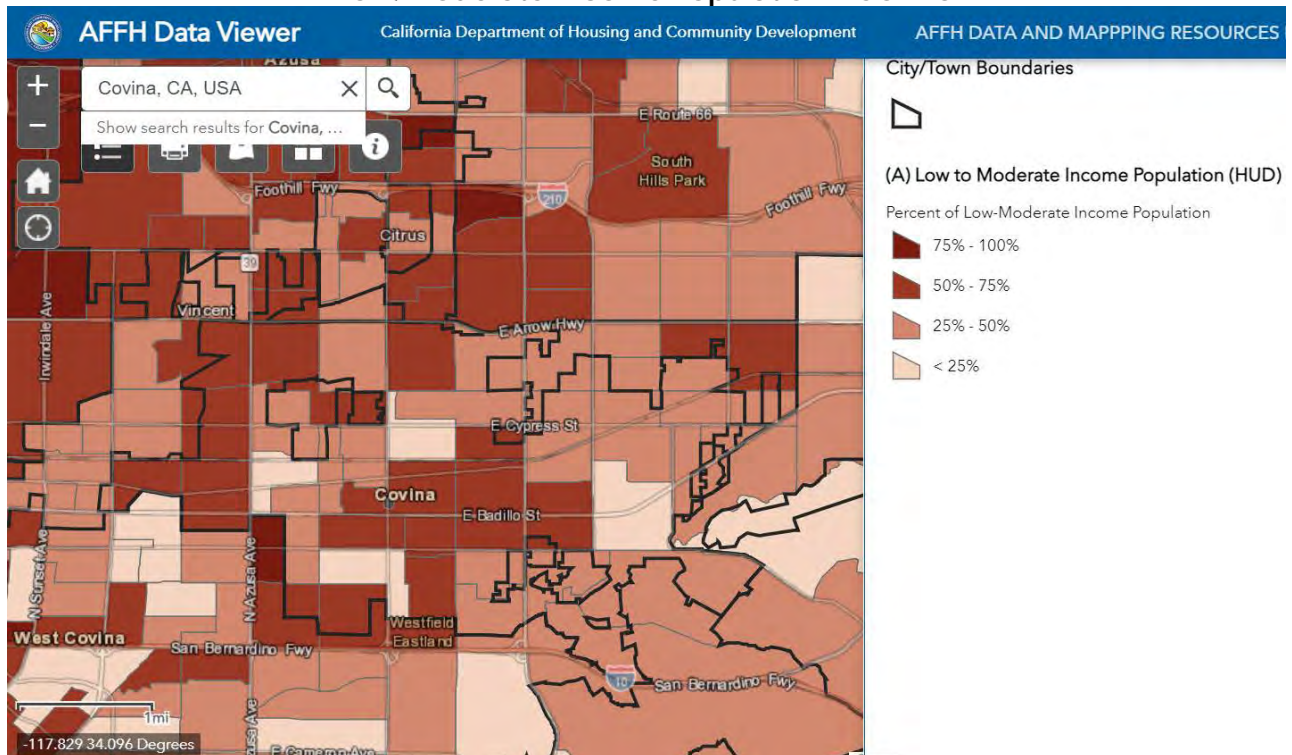
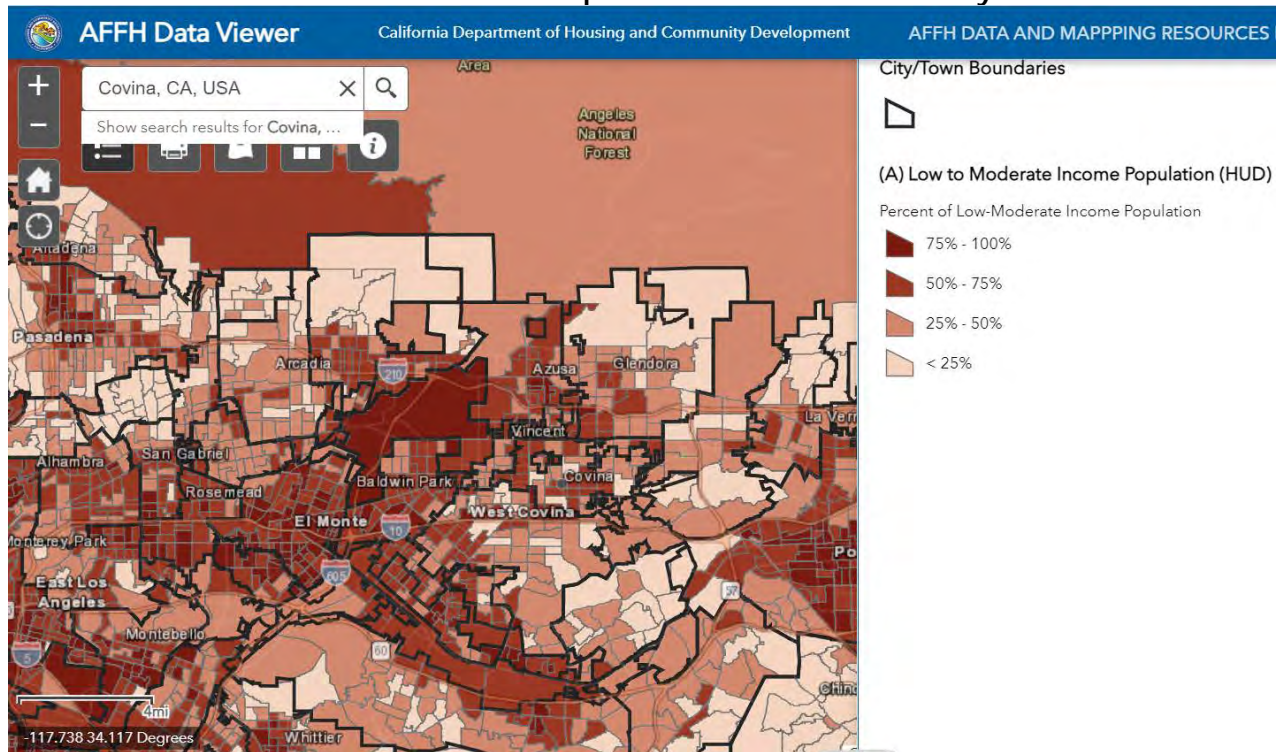


Figure D-9
Low/Moderate Income Population – San Gabriel Valley Area



C. Racially/Ethnically Concentrated Areas

1) Racially/Concentrated Areas of Poverty

According to HUD, a racially or ethnically concentrated area of poverty (R/ECAP) is an area in which 50 percent or more of the population identifies as non-White and 40 percent or more of residents are living in poverty. As shown in 0, there are no designated R/ECAP areas in Covina. The nearest R/ECAP areas to Covina are located in El Monte to the southwest and Pomona to the southeast (0).

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

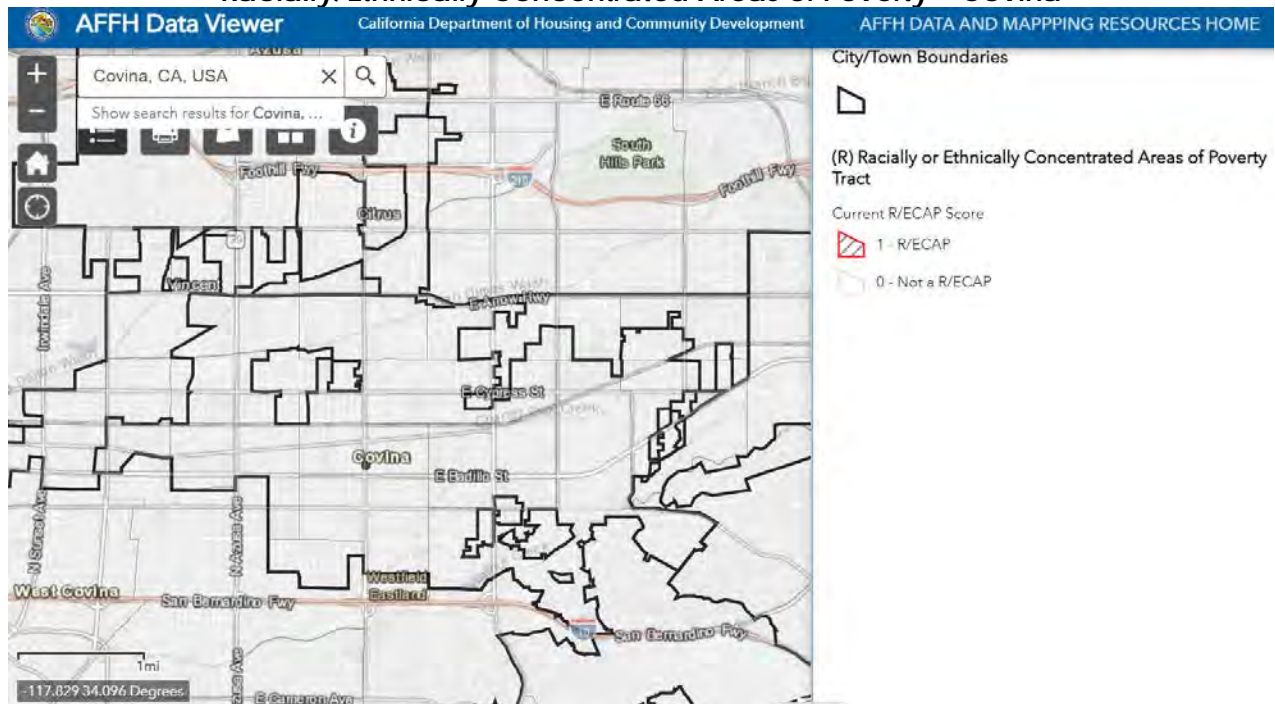
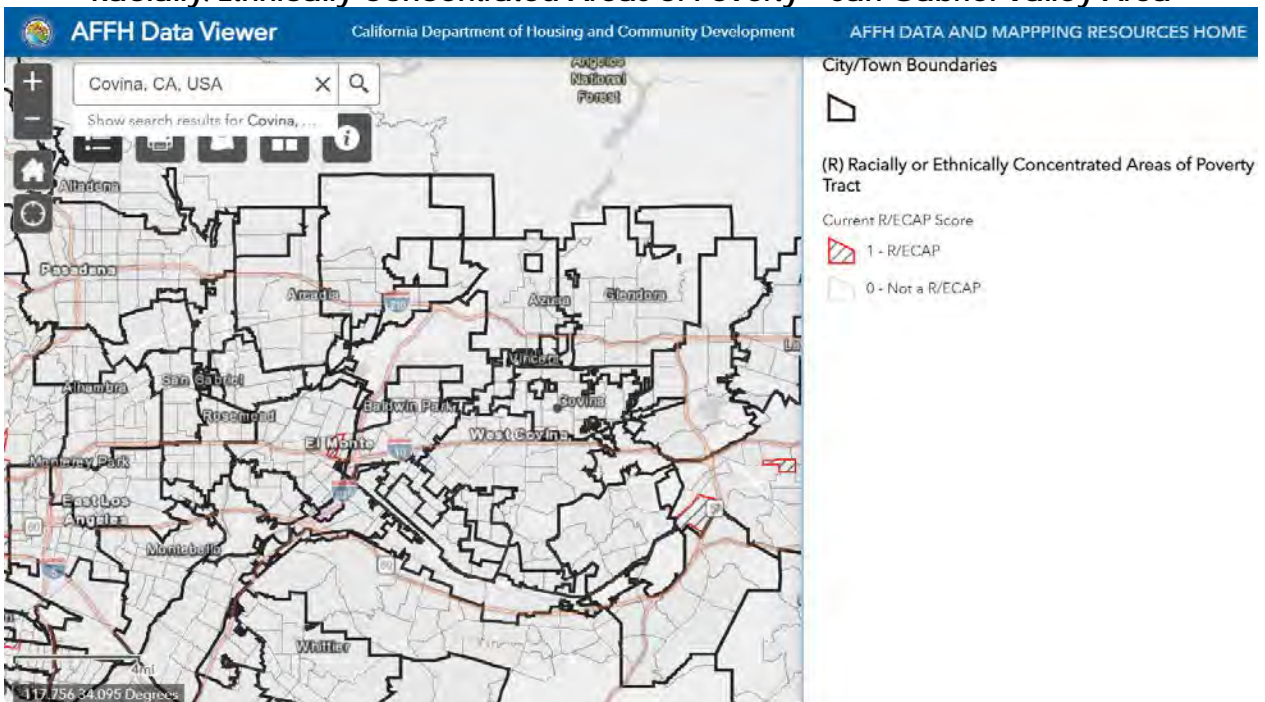


Figure D-11
Racially/Ethnically Concentrated Areas of Poverty – San Gabriel Valley Area



Recent Census estimates regarding poverty status of households in Covina are shown in 0. As seen in this map, poverty rates are generally higher (10-20%) in the central portions of

the city, while other areas have poverty rates below 10%. Figure D-13 shows that poverty rates in Covina are similar to the adjacent areas.

Figure D-12
Poverty Status - Covina

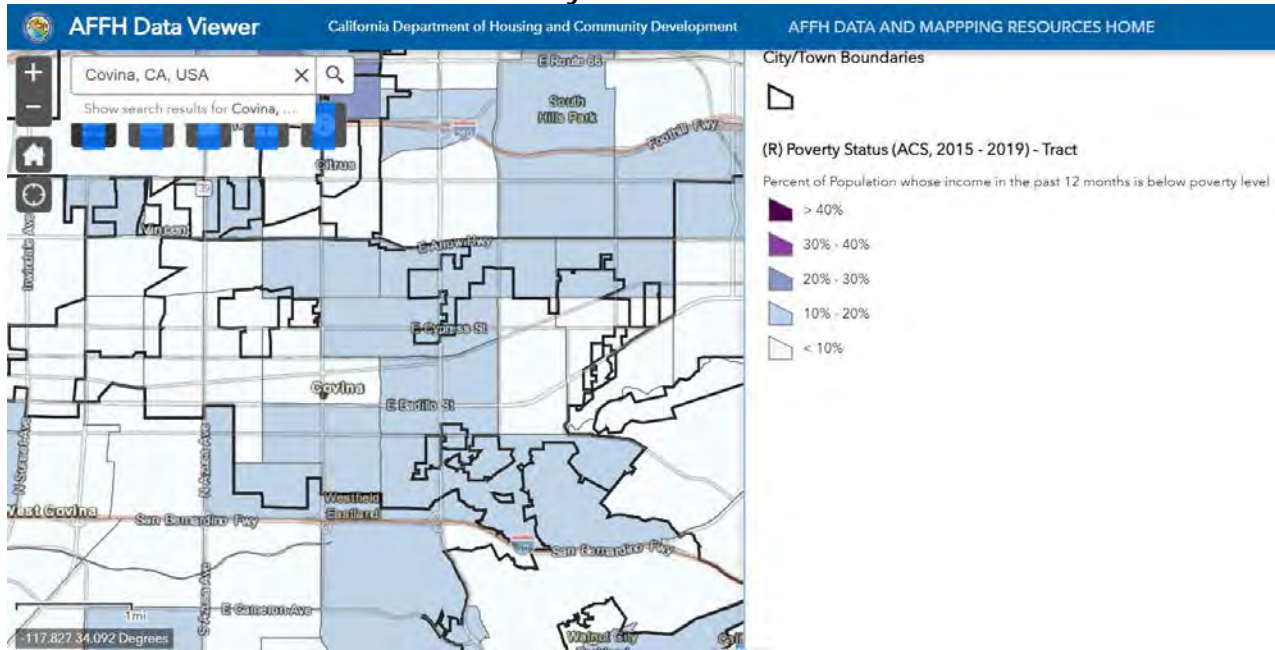
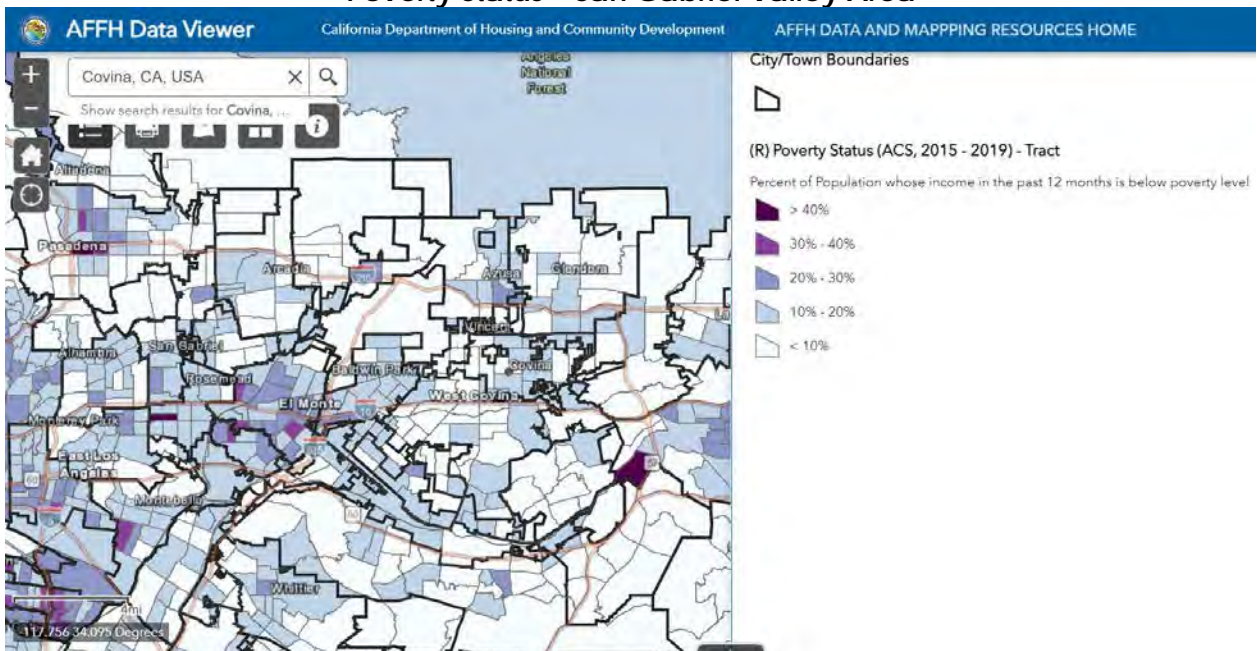


Figure D-13
Poverty Status – San Gabriel Valley Area



Programs in the Housing Plan that specifically target assistance for households with incomes below the poverty line include 1.3 (Section 8 Rental Assistance), 1.4 (Preservation of Assisted Housing), 1.5 (Mobile Home Park Preservation), 2.1 (Adequate Sites to

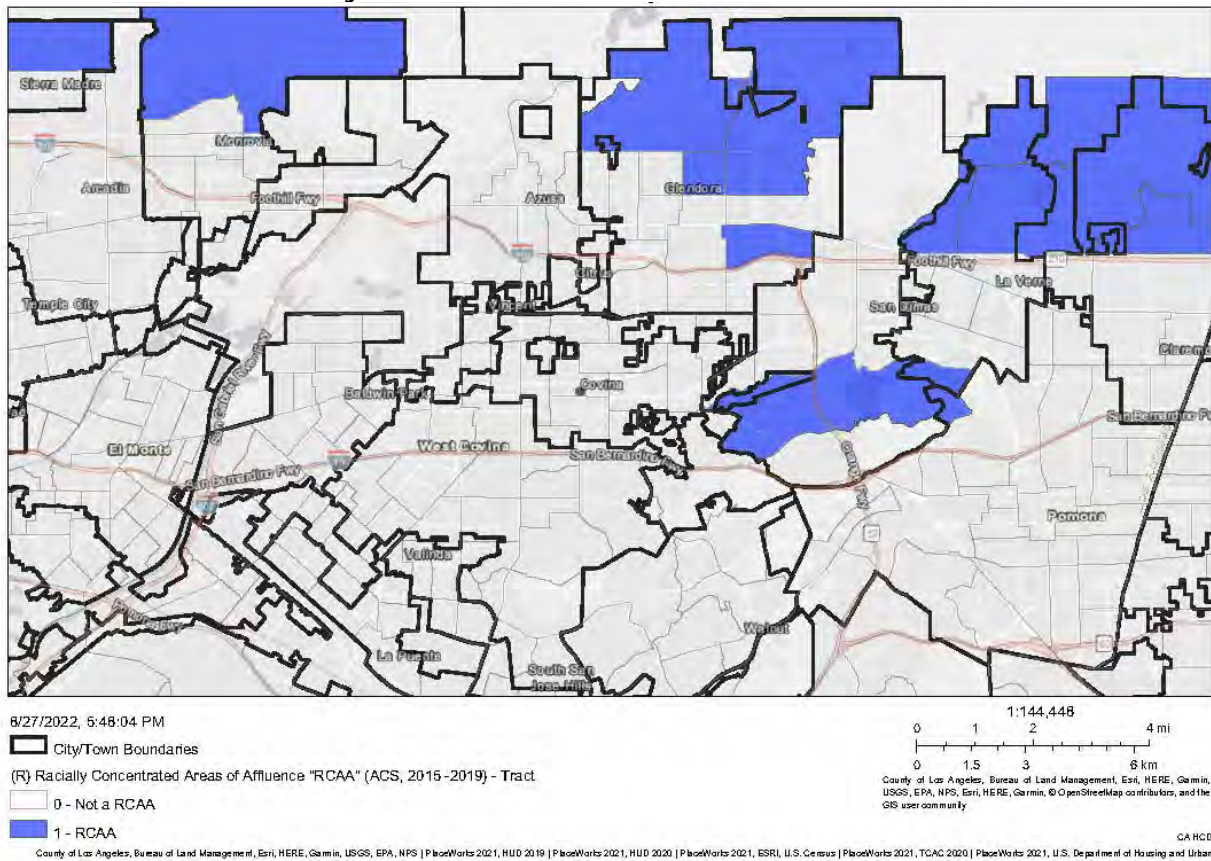
Accommodate Housing Needs), 2.2 (Redevelopment of Underutilized Sites), 2.4 (Housing for Low- and Moderate-income Households) and 5.1 (Affirmatively Further Fair Housing).

2) Racially/Concentrated Areas of Affluence

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

Figure D-14 shows Racially Concentrated Areas of Affluence (RCAs) for Covina and the surrounding areas. There are no RCAs within Covina. The nearest RCAs to Covina are located in San Dimas to the east and in the foothill areas to the north.

Figure D-14
Racially Concentrated Areas of Affluence - Covina



D. Disparities in Access to Opportunity

1) Overview

California housing law requires cities to analyze disparities in access to opportunity as part of the fair housing assessment. The California Tax Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) have developed

maps showing access to various types of opportunities such as education, economic, transportation, and environmental indicators.

2) Educational Opportunity

Covina-Valley Unified School District (CVUSD) serves most of Covina as well as portions of West Covina, Glendora, San Dimas, and Irwindale. Total CVUSD student enrollment was reported as 11,193 in 2022.

According to the California Department of Education (CDE), CVUSD's student population is 93.7% non-white compared to 87.0% for Los Angeles County as a whole and 78.9% statewide. Approximately 69% of students were classified as disadvantaged and 9.8% were reported as English learners. Performance scores for CVUSD schools in Covina as reported by CDE are shown in Table D-1.

Table D-1
Performance Scores – Covina-Valley Unified School District

School	English Language Arts	Mathematics
Barranca Elementary	High	Low
Ben Lomond Elementary	Low	Low
Covina High	Low	Low
Covina-Valley Learning Options Academy	Low	Low
Cypress Elementary	Low	Low
Las Palmas Middle	Low	Low
Merwin Elementary	Low	Low
Northview High	Low	Very Low
Sierra Vista Middle	Low	Low

As shown in Figure D-15, TCAC educational opportunity scores are highest in the eastern portion of the city and lowest in the northwestern portion of the city. The County AI describes overall school proficiency in the Urban County Area in relation to race and ethnicity. White and Asian residents generally have greater access to proficient schools, particularly in Santa Monica and Glendora, while Black and Hispanic residents living in Palmdale, Inglewood, and Montebello lived among schools with the lowest levels of proficiency within the Urban County area. The largest concentration of low scores are found near Downtown Los Angeles. Figure D-16 shows educational opportunity scores in Covina in the context of the larger San Gabriel Valley area.

When the educational opportunity map (Figure D-15) is compared with other demographic indicators such as race/ethnicity, family status and disabilities, no major patterns are apparent. Most of Covina's potential housing sites identified in Appendix B are located in areas with relatively high education opportunity scores of 0.50 - 0.75, and potential ADUs and SB 9 single-family lot splits provide educational opportunity in the highest category of >0.75 in the eastern portions of the city. As shown in Figure B-2 of the Sites Inventory Appendix, Mixed Use Area G along Roland Avenue west of Barranca Avenue is located near Barranca Elementary School, which has the highest performance scores of all schools in Covina (Table D-2). These data indicate that the inventory of

potential housing sites does not negatively impact access to educational opportunity in Covina.

Figure D-15
TCAC Educational Opportunity Areas – Covina

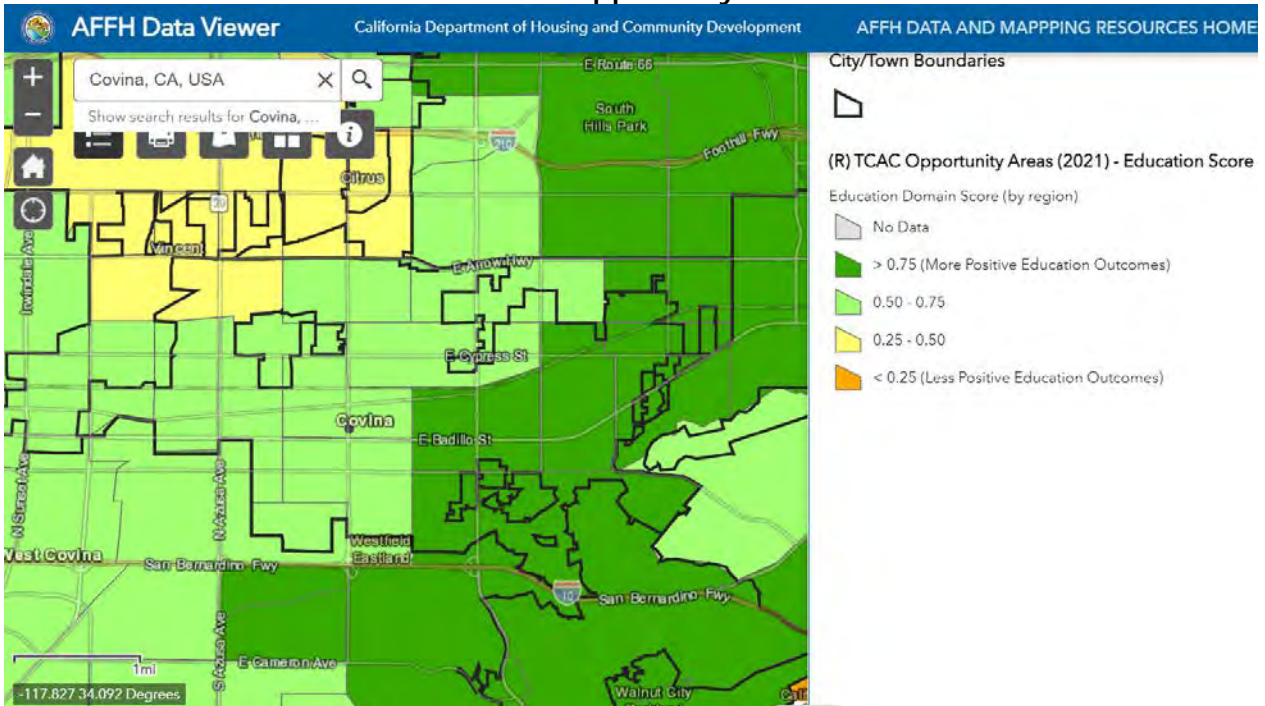
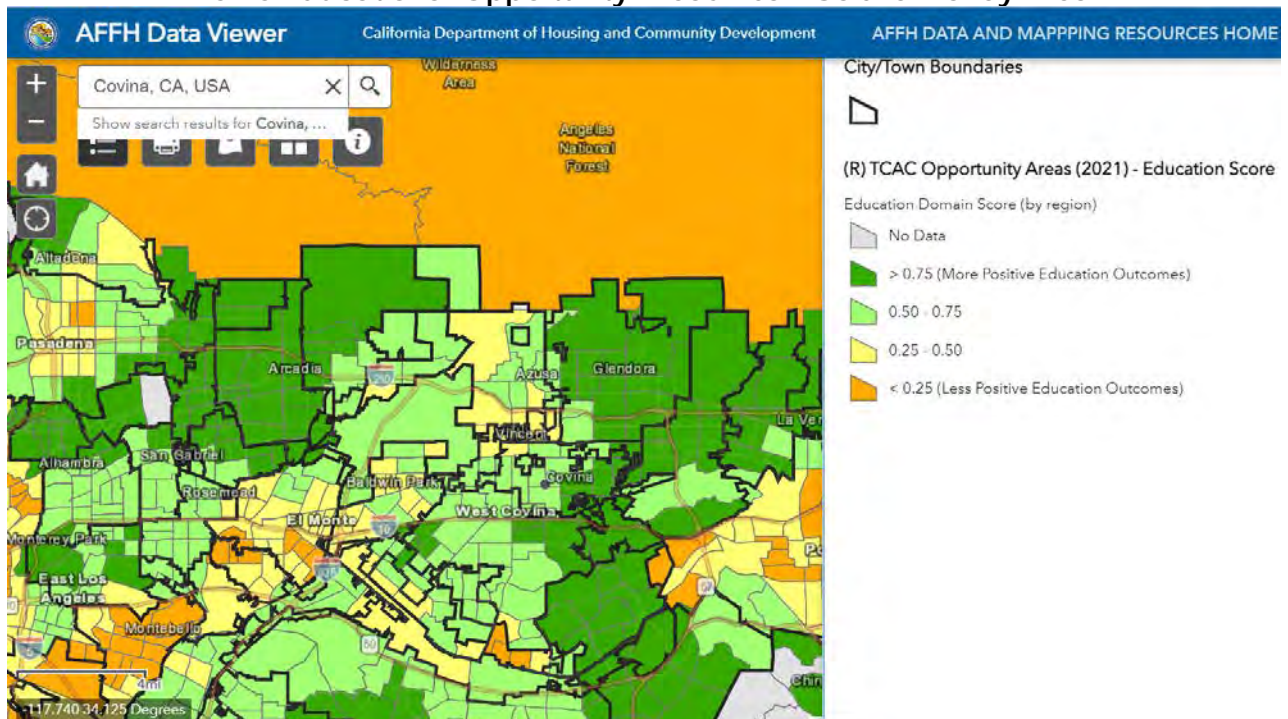


Figure D-16
TCAC Educational Opportunity Areas – San Gabriel Valley Area



3) Economic and Employment Opportunity

Two factors in measuring the Economic Opportunity Score are job proximity and labor market engagement. Having adequate and decent-paying employment is a prerequisite for residents to afford adequate housing in their community. The County AI reported that economic opportunity scores for the Urban County area were similar for Whites, Black, and Asian/Pacific Islander while the score for Hispanics was slightly lower. However, labor market engagement index values were significantly higher for Whites and Asian/Pacific Islanders compared to African Americans and Hispanics. Figure D-18 shows economic opportunity scores in Covina in the context of the larger San Gabriel Valley area. In Covina, the highest economic opportunity scores are found in the western and southeastern portions of the city (Figure D-17). In reviewing socioeconomic data regarding protected groups, no distinct patterns are apparent related to job opportunities for disadvantaged populations in Covina.

According to HUD analysis of job proximity (Figure D-19) Covina has relatively lower job proximity than some areas to the east (such as San Dimas and Diamond Bar) and west (such as Monrovia, Duarte and Irwindale). Within Covina, higher job proximity is found in the southern portion of the city near the I-10 freeway.

In recent years the City has actively encouraged redevelopment in the Town Center Specific Plan area surrounding the Covina Metrolink Station, as well as a new Mixed Use Overlay District to stimulate both housing development and economic revitalization to provide expanded job and housing opportunities for residents. These areas are also positively correlated with higher existing job proximity. According to SCAG's 2045 growth forecast, Covina is expected to add 2,600 jobs during 2016-2045, an increase of 10%.

Figure D-17
TCAC Economic Opportunity – Covina

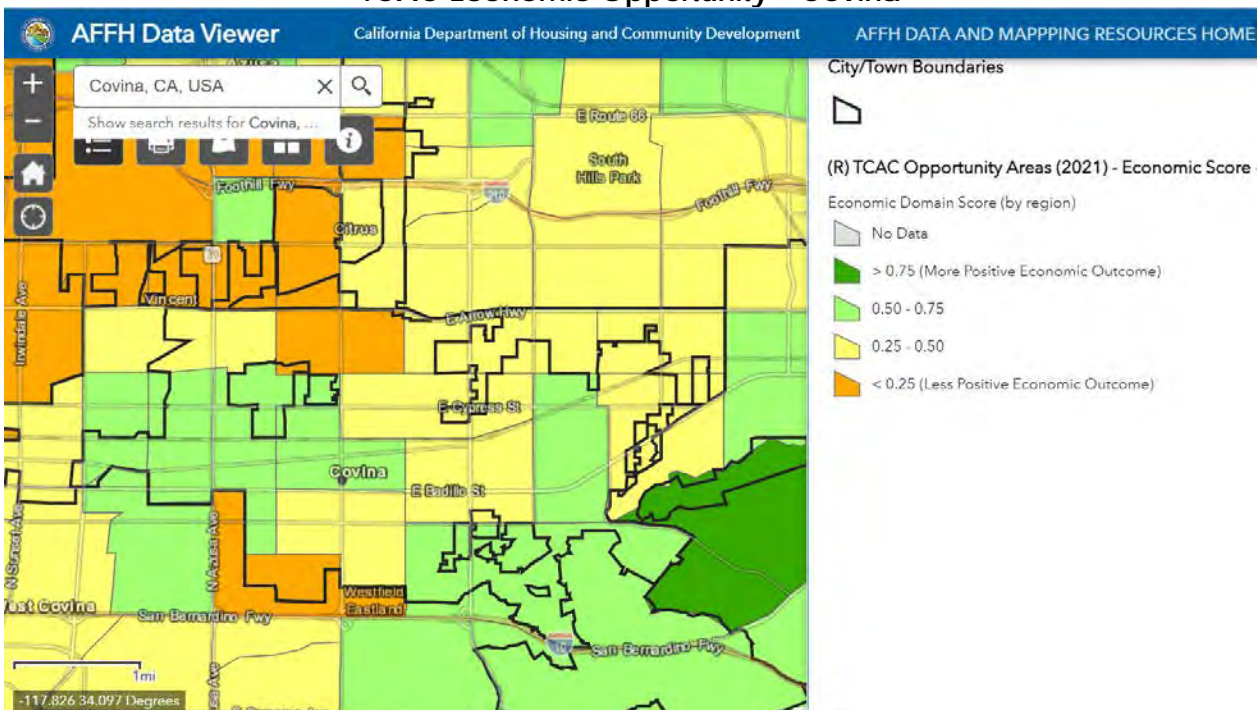


Figure D-18
 TCAC Economic Opportunity – San Gabriel Valley Area

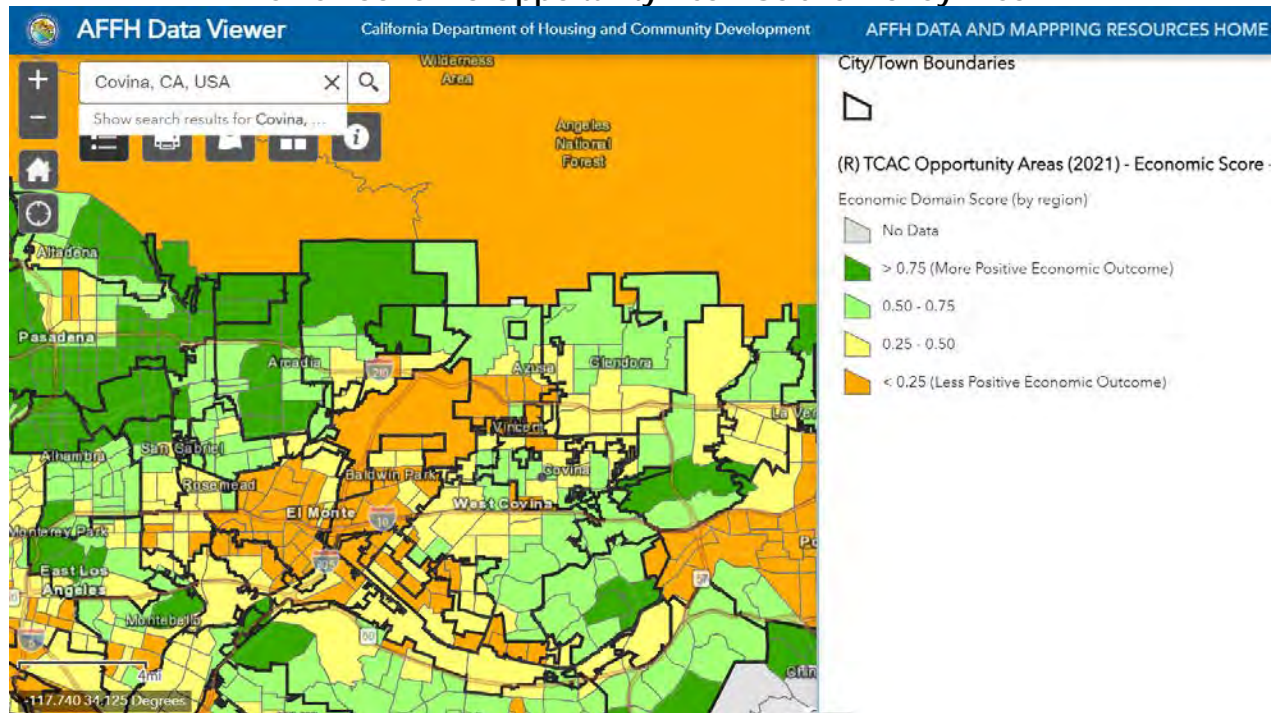
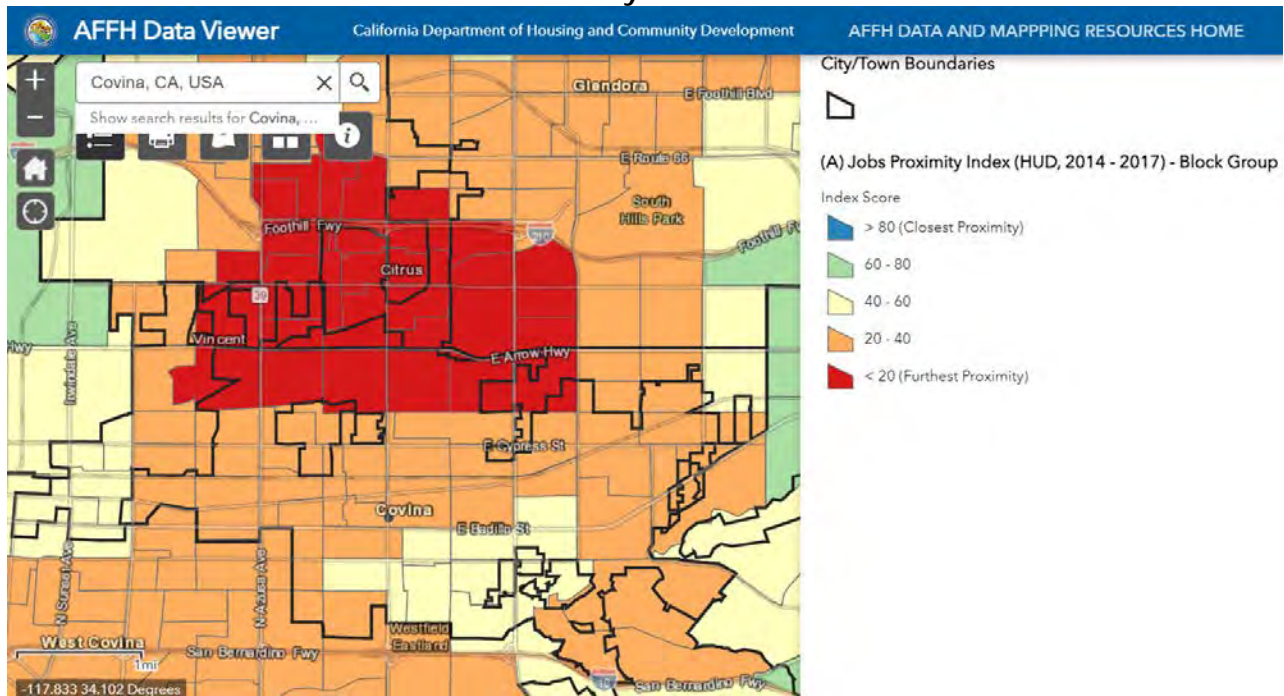


Figure D-19
 Jobs Proximity Index – Covina



4) Transportation Opportunity

Transit opportunity refers to a person’s ability to travel within a city and region on a daily basis to access services, employment, schools, and other resources. Indicators of transit opportunity include the number, location and frequency of transit routes relative to housing and job opportunities.

Covina enjoys excellent public transportation, as shown in Figure D-20. Metrolink rail service is accessible at the Covina Transit Center near the downtown, and several bus routes also serve the city, although the area to the east of Glendora Avenue is primarily single-family residential with fewer bus routes. Metro bus routes providing connections to the Covina Transit Center include Lines 281, 488 and 490. Metro is also the primary funding source for Access Services, the federally-required ADA paratransit service provider for Los Angeles County. This service is offered to individuals whose disabilities prevent them from independently using regular bus or rail service. It is comparable to fixed-route service and offers curb-to-curb service during hours when local bus service is provided.

**Figure D-20
San Gabriel Valley Transit Service Map**

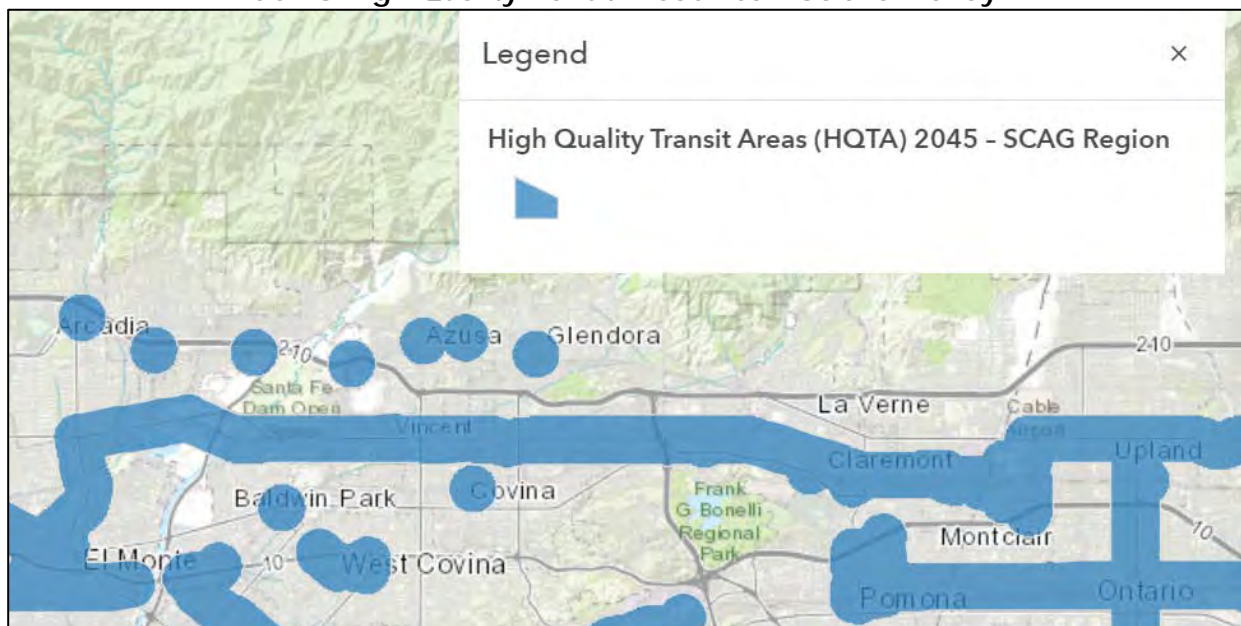


According to the County AI, the transit trip index for the Urban County area shows little disparity among the racial or ethnic classes. As discussed previously with regard to economic and employment opportunity, socioeconomic data for protected groups shows no distinct patterns related to disproportionate job access for disadvantaged populations in Covina. According to HUD analysis of job proximity (Figure D-19) Covina has

relatively lower job proximity than some areas to the east (such as San Dimas and Diamond Bar) and west (such as Monrovia, Duarte and Irwindale). Within Covina, higher job proximity is found in the southern portion of the city near the I-10 freeway.

The Southern California Association of Governments (SCAG) developed a mapping tool for High Quality Transit Areas (HQTAs) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile of a major transit stop and a high-quality transit corridor. Figure D-21 shows that there is one major transit stop in Covina, the Metrolink Station, which also provides transfer connections to several bus lines. In addition, an HQTA run east/west along Arrow Highway, which forms portions of the northern border of Covina. As discussed previously, the recent Town Center Specific Plan adjacent to the Covina Metrolink Station creates incentives for housing development and economic revitalization in close proximity to high quality transit opportunity.

Figure D-21
SCAG High Quality Transit Areas - San Gabriel Valley



5) Environmental Opportunity

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

In Covina, the highest environmental opportunity scores are found in the central and western portions of the city (Figure D-22) while neighborhoods along the city's southern border near the I-10 freeway show lower scores.

Figure D-22
TCAC Environmental Opportunity – Covina

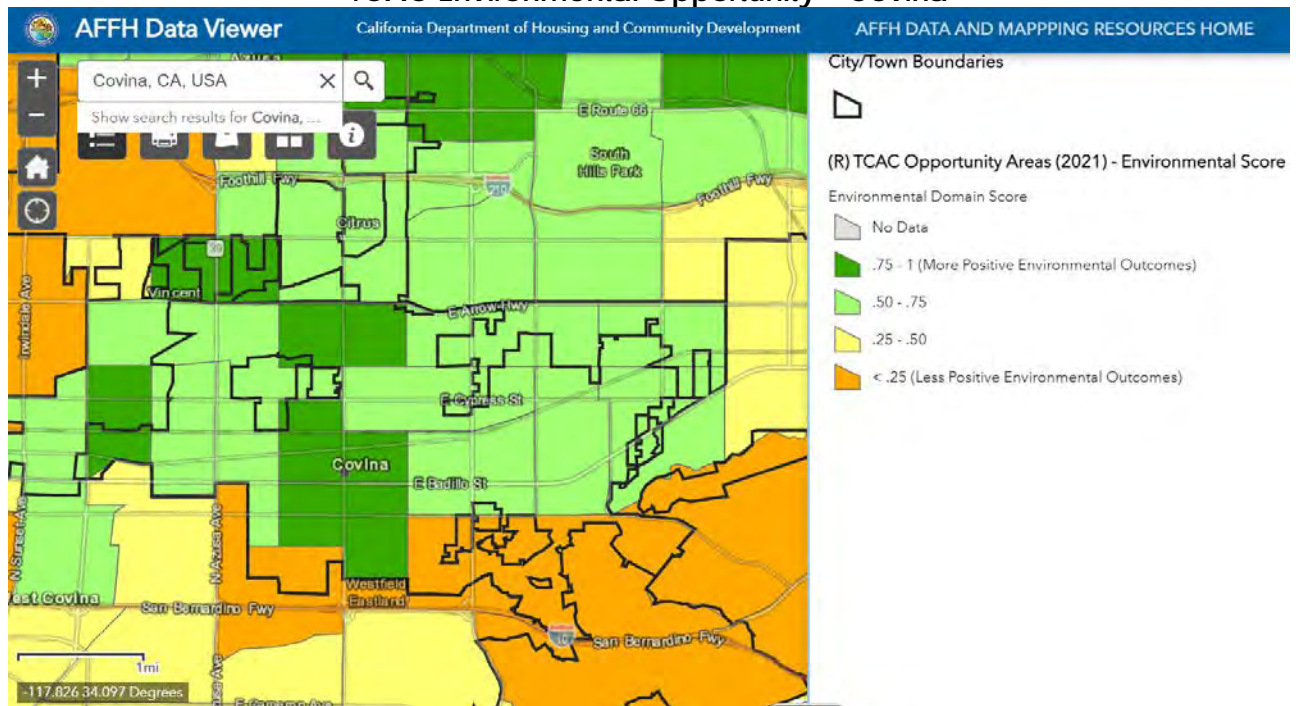
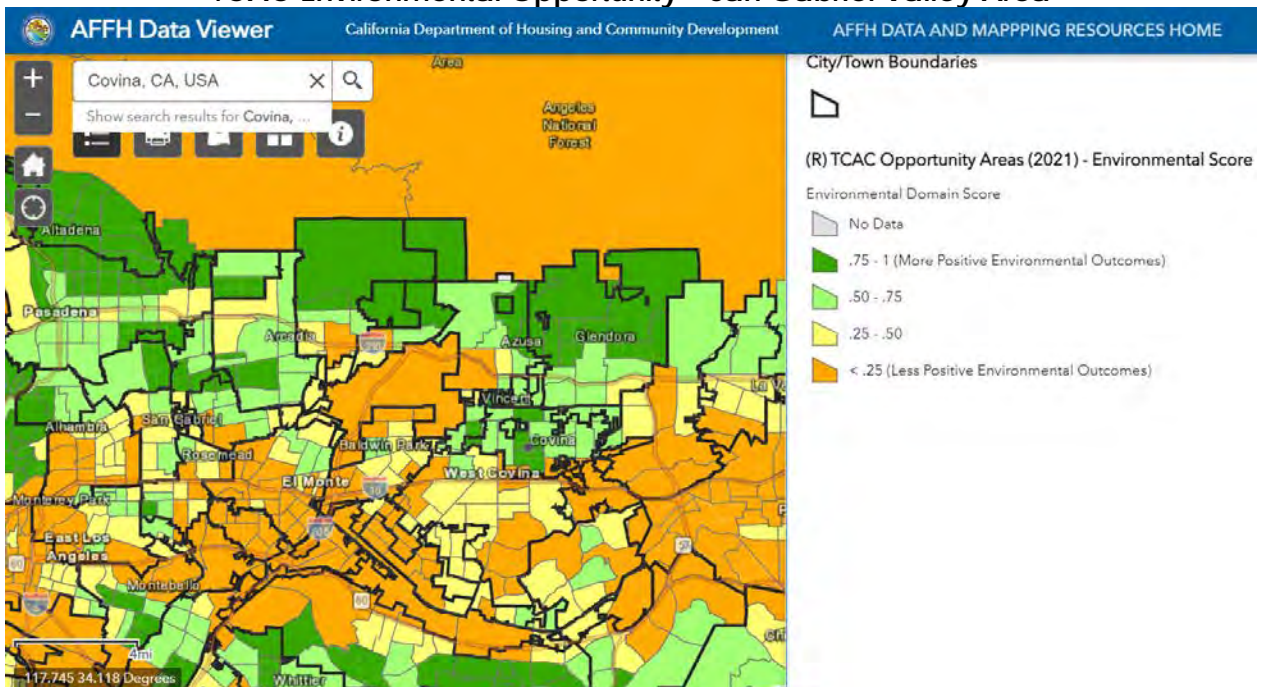


Figure D-23
TCAC Environmental Opportunity – San Gabriel Valley Area



In the context of the larger San Gabriel Valley, Covina generally enjoys higher environmental scores than areas to the south (Figure D-23).

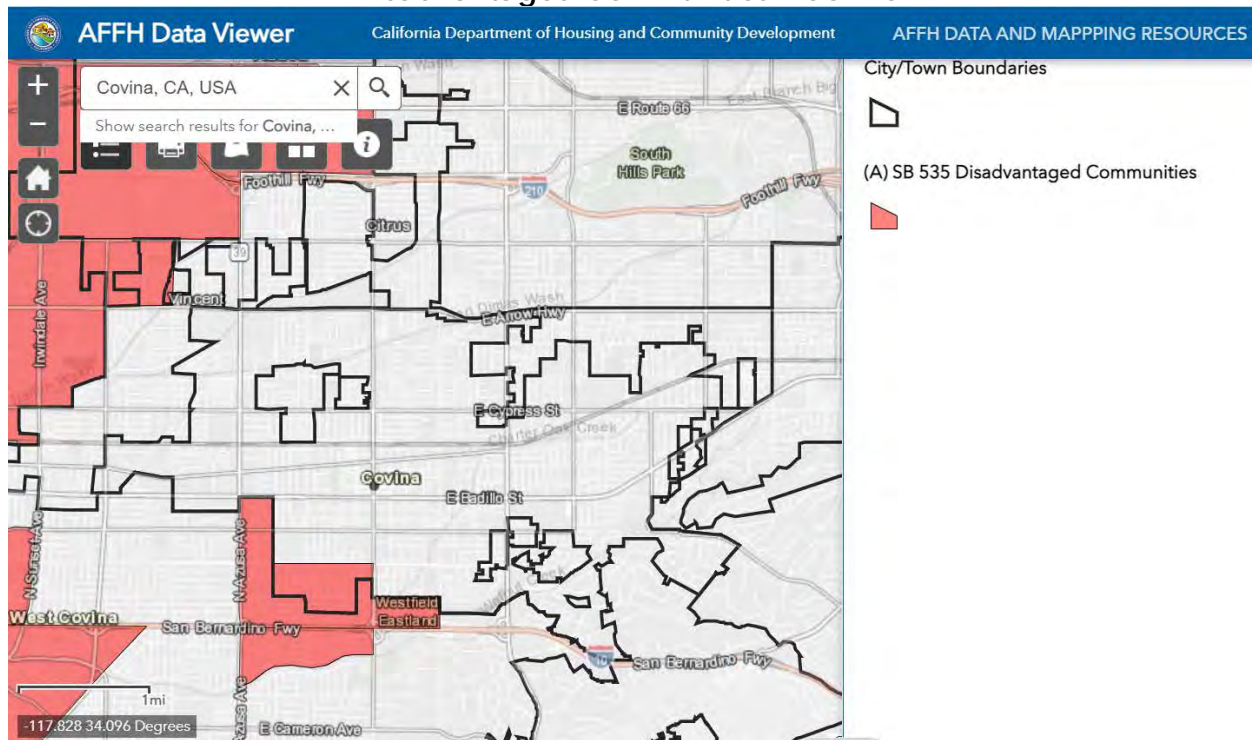
The inventory of sites for future housing development (Appendix B) furthers environmental policy objectives by creating additional housing opportunities in areas with more positive environmental scores, including the Town Center Specific Plan area and through ADUs and SB 9 lot splits. Other City policies and programs that support healthy residential neighborhoods include public park facilities and recreational programs for residents.

The City has not yet adopted specific environmental justice policies in the General Plan due to budget constraints. When the General Plan is amended to address environmental justice requirements, consistency with the Housing Element and AFFH policies will be evaluated and appropriate policies will be included.

6) Disadvantaged Communities

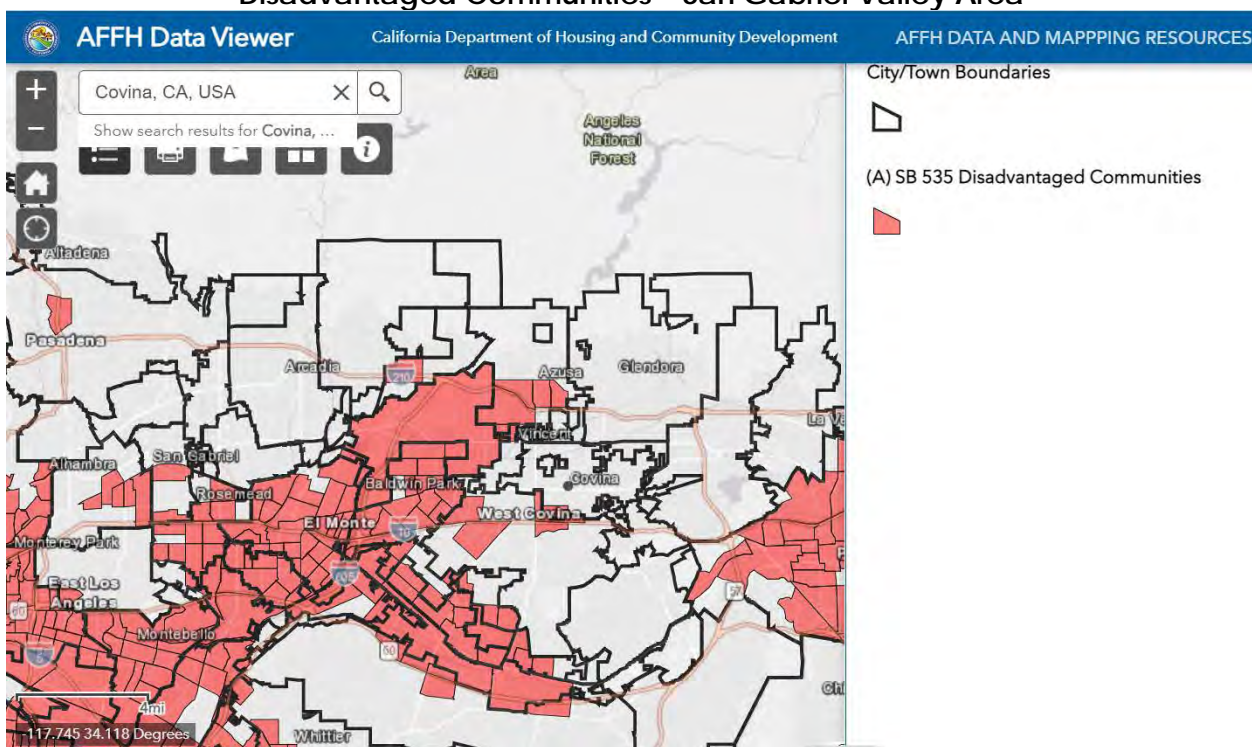
Senate Bill 1000 (SB 1000) requires cities with identified disadvantaged communities (DACs) to include environmental justice goals and policies in the General Plan. Per SB 1000, the California EPA uses CalEnviroScreen, a mapping tool to identify disadvantaged communities. CalEnviroScreen examines various indicators to characterize pollution and socioeconomic factors. As seen in Figure D-22 below, one area in the southwestern portion of Covina is classified as a disadvantaged community.

Figure D-22
Disadvantaged Communities – Covina



As seen in Figure D-23, disadvantaged communities in the San Gabriel Valley area are primarily found to the west of Covina and also in the Pomona area to the east.

Figure D-23
Disadvantaged Communities – San Gabriel Valley Area



E. Disproportionate Housing Needs and Displacement Risk

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

1) Cost Burden (Overpayment)

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

Overpayment is a problem for many Covina residents, particularly lower-income households. According to recent HUD estimates (Figure D-24) approximately 3,470 renter households (51% of all renters) and 2,600 owner households (31% of all owners) were paying more than 30% of income for housing. The highest rates of overpayment occur among very-low-income and extremely-low-income households. The impact of housing overpayment on lower income households is particularly significant for special needs populations – seniors, persons with disabilities, and female-headed households with children.

Figure D-24
Cost Burden by Tenure and Income Category - Covina

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	965	880	1,120
Household Income >30% to less-than or= 50% HAMFI	1,050	565	1,285
Household Income >50% to less-than or= 80% HAMFI	1,180	135	2,005
Household Income >80% to less-than or= 100% HAMFI	230	10	820
Household Income >100% HAMFI	45		1,555
Total	3,470	1,590	6,780
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	430	360	585
Household Income >30% to less-than or= 50% HAMFI	460	265	825
Household Income >50% to less-than or= 80% HAMFI	765	335	1,155
Household Income >80% to less-than or= 100% HAMFI	410	80	965
Household Income >100% HAMFI	535	10	4,950
Total	2,600	1,050	8,480

As shown in Figure D-25, overpayment among renters is most prevalent in the northwestern, southern and southeastern portions of the city where between 60 and 80% of renters are overpaying for housing. When compared to conditions in other areas of the San Gabriel Valley (Figure D-26) overpayment among Covina renters appears be similar to adjacent communities.

Figure D-25
Renters Overpaying for Housing - Covina

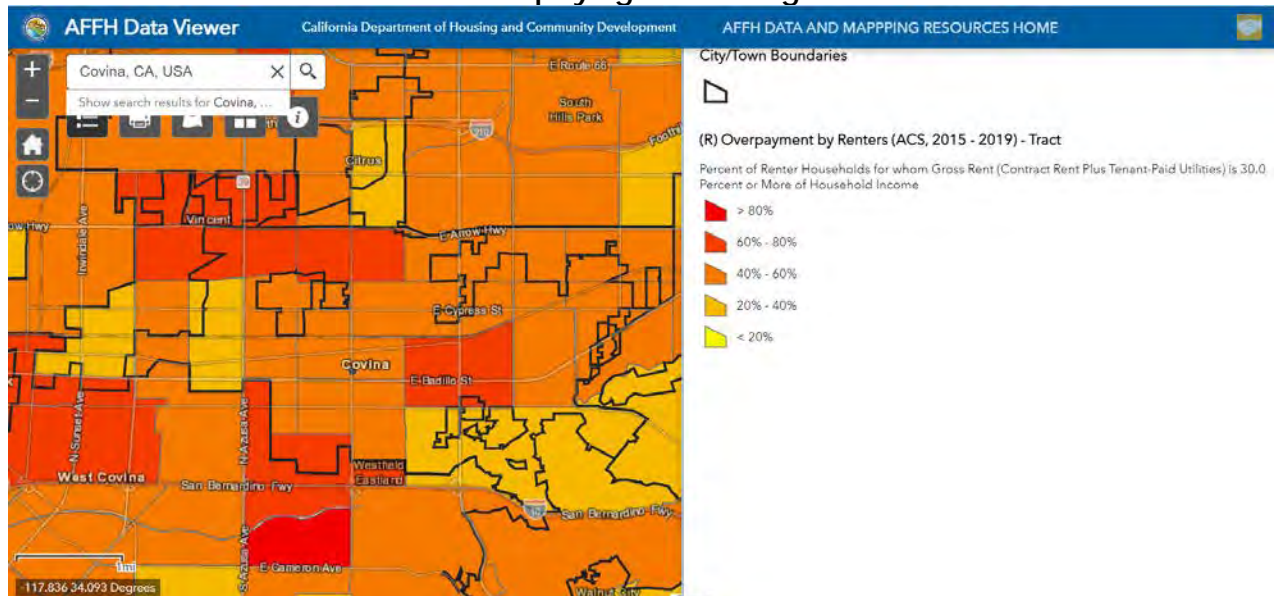
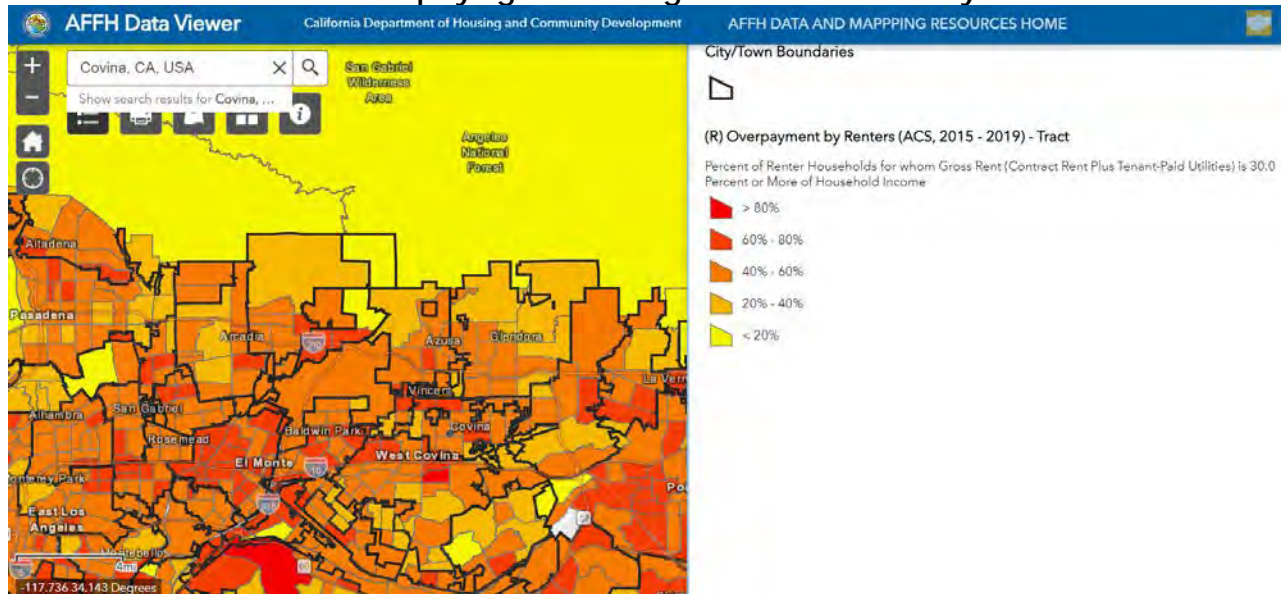


Figure D-26
Renters Overpaying for Housing – San Gabriel Valley Area



Overpayment among Covina homeowners ranges from 20% to 60% in most portions of the city, although low overpayment rates (less than 20%) are found in the eastern neighborhoods (Figure D-27). Rates of overpayment among homeowners in Covina appear to be similar to the adjacent communities of the San Gabriel Valley (Figure D-28).

The problems of overpayment are addressed through programs in the Housing Plan (Chapter VI) including 1.3 Section 8 Rental Assistance, 1.4 Preservation of Assisted Housing, 1.5 Mobile Home Park Preservation, 2.1 Adequate Sites to Accommodate Housing Needs, 2.2 Redevelopment of Underutilized Sites, 2.3 Accessory Dwelling Units, 2.4 Housing for Low- and Moderate-income Households, and 3.1 First-Time Homebuyer Assistance.

Figure D-27
Homeowners Overpaying for Housing – Covina

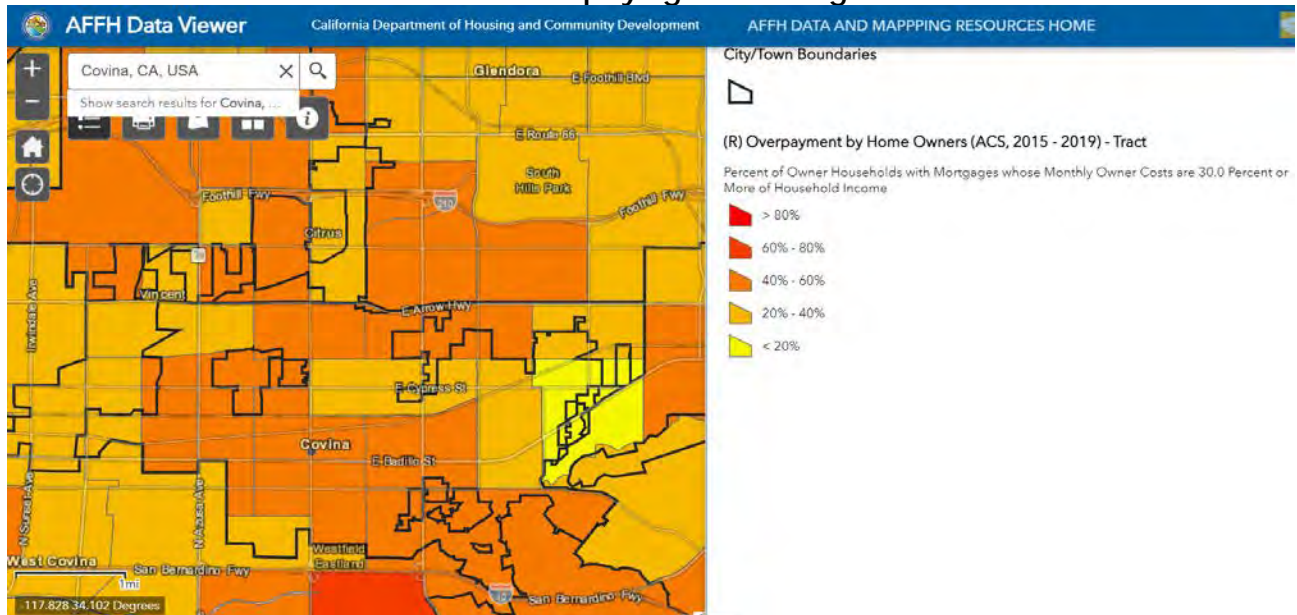
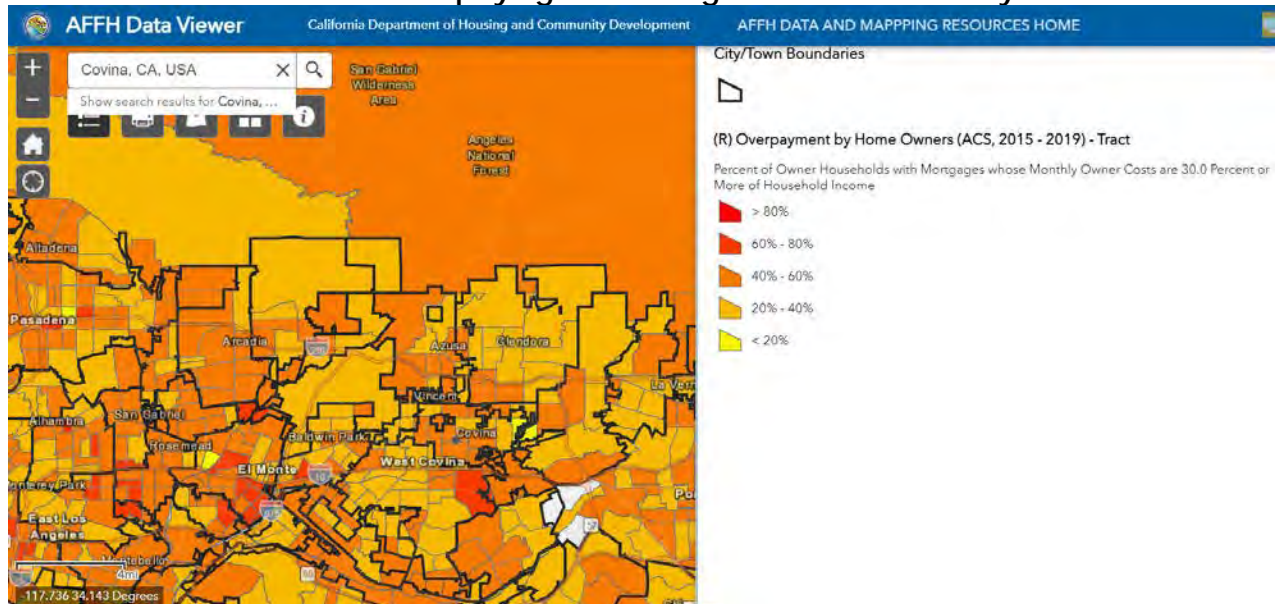


Figure D-28
Homeowners Overpaying for Housing – San Gabriel Valley Area



2) Overcrowding

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

a variety of other problems such as lower educational performance among children, psychological stress and adverse health impacts.

In Covina, some neighborhoods in the central and western portions of the city have overcrowding rates of 15-20% (Figure D-29). When viewed in the context of the larger San Gabriel Valley area, overcrowding in Covina is similar to adjacent cities but lower than many areas further to the west (Figure D-30).

The problems of overcrowding are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Programs 1.3 Section 8 Rental Assistance, 1.4 Preservation of Assisted Housing, 1.5 Mobile Home Park Preservation, 2.1 Adequate Sites to Accommodate Housing Needs, 2.2 Redevelopment of Underutilized Sites, 2.3 Accessory Dwelling Units, 2.4 Housing for Low- and Moderate-income Households, and 3.1 First-Time Homebuyer Assistance).

**Figure D-29
Overcrowded Households – Covina**

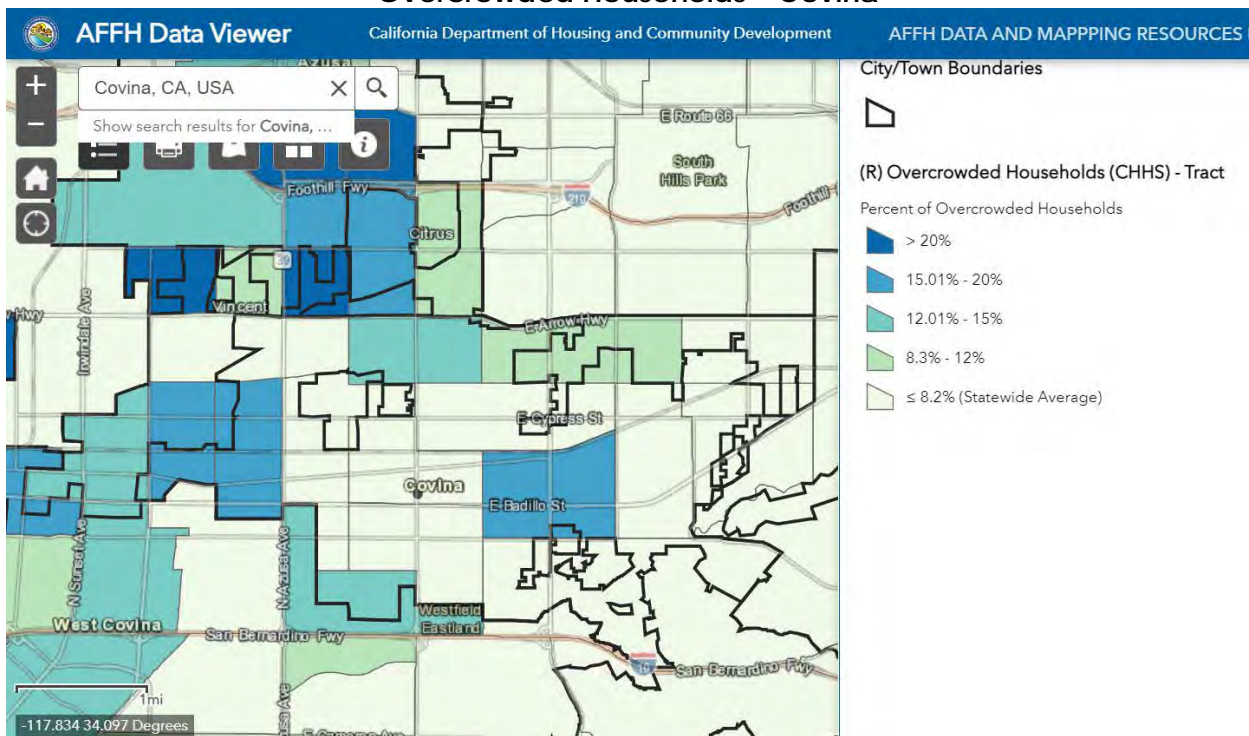
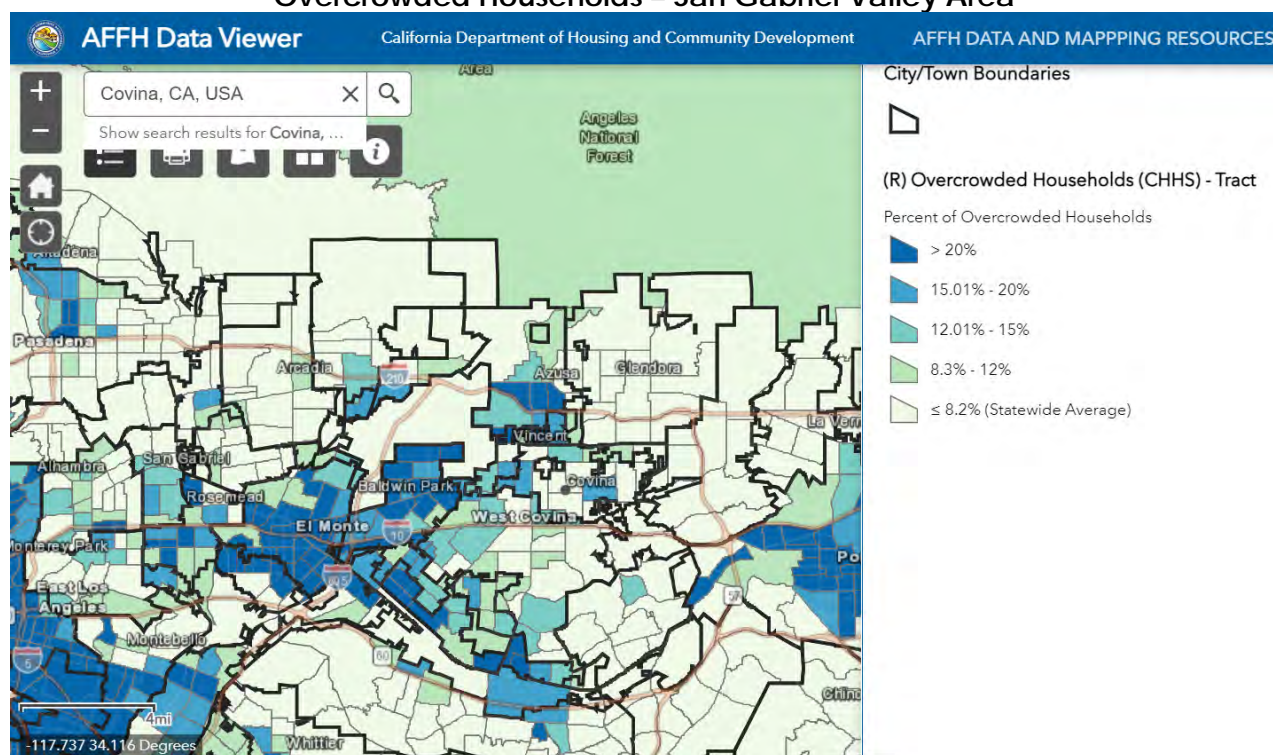


Figure D-30
Overcrowded Households – San Gabriel Valley Area



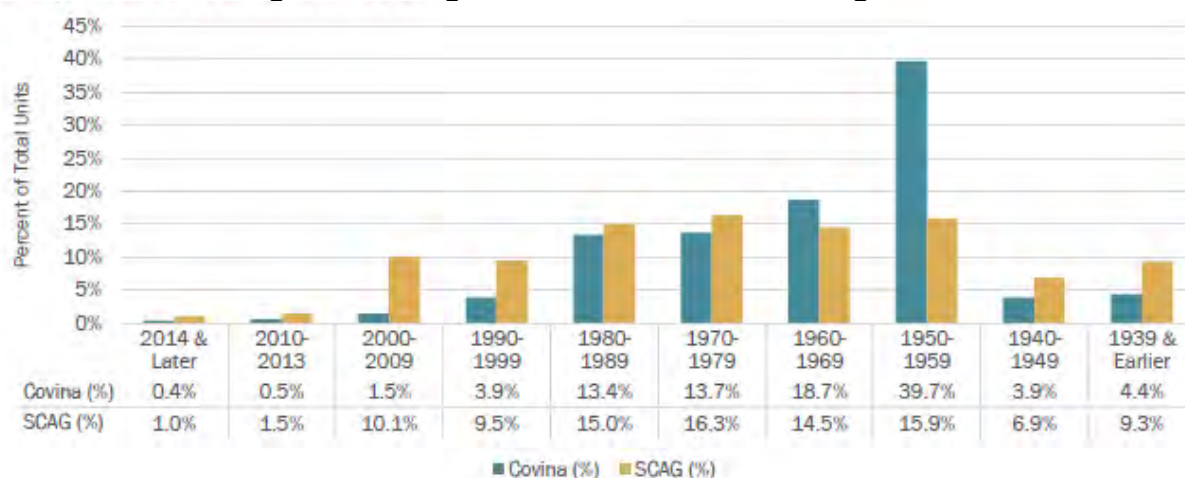
3) Substandard Housing

The age of a housing unit is often an indicator of housing conditions. Housing units without proper maintenance can deteriorate over time. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in 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.

Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs. Additionally, older units may not be built to current building standards for fire and earthquake safety.

The age of housing units in Covina compared to the SCAG region as a whole is shown in Figure D-31. This chart indicates 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, and approximately 10% of units may require substantial rehabilitation or replacement. Housing units in need of rehabilitation are distributed throughout the city with no areas observed to have high concentrations of substandard units. As described in Chapter VI, Program 1.2, the Residential Rehabilitation Program provides funding assistance to low- to moderate-income homeowners for home repairs.

Figure D-31
Age of Housing Units – Covina vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

4) Homelessness

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

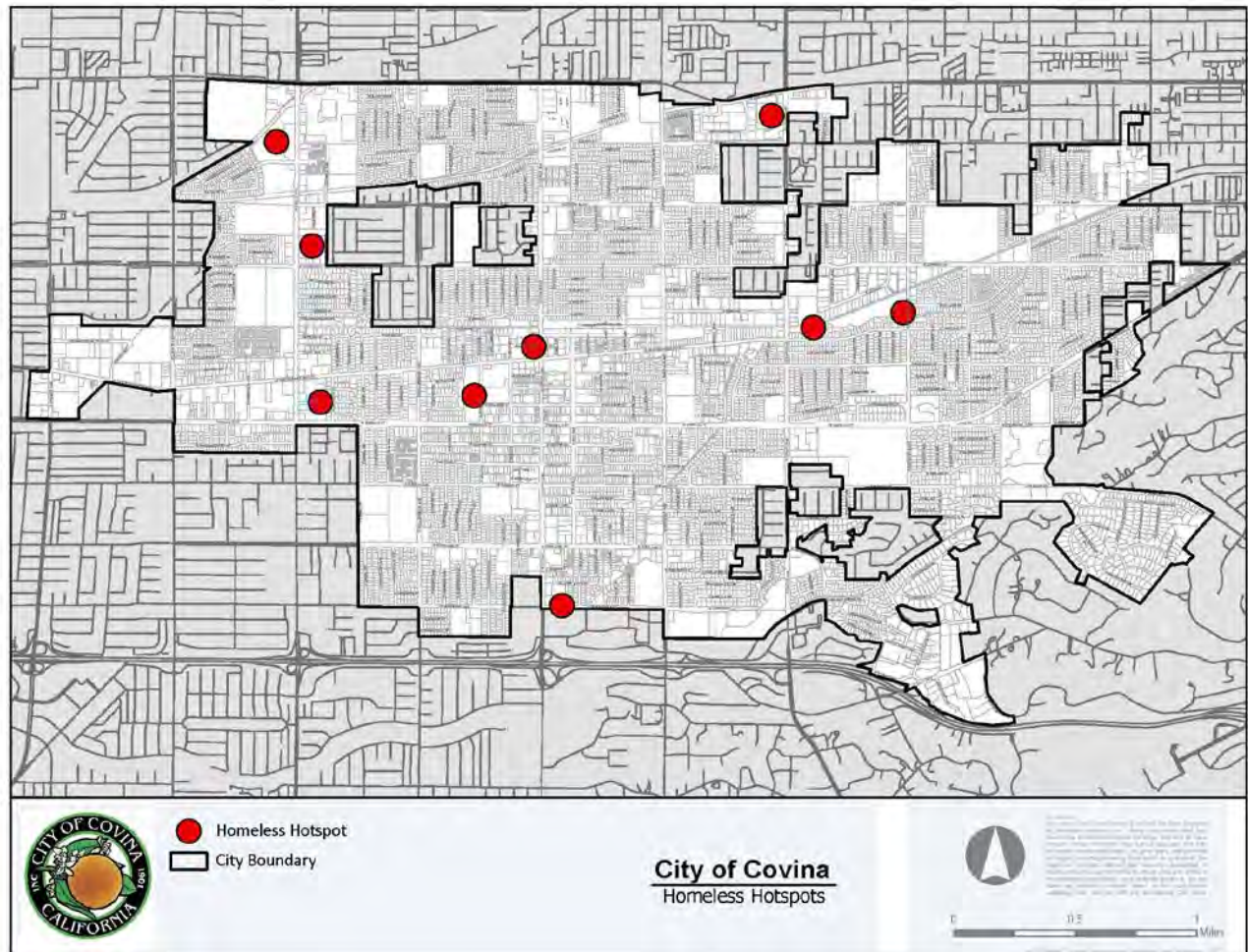
The homeless count conducted by the Los Angeles Homeless Services Authority (LAHSA) in 2020 estimated that there were approximately 58,936 homeless persons Los Angeles County. These include families that might be displaced through evictions, women and children displaced through abusive family life, persons with substance abuse problems, veterans, or persons with serious mental illness. 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 2020.⁶ More recently, the 2022 homeless survey reported that the number of homeless persons in Covina had declined to 52, of which 3 were living in transitional housing and 49 were unhoused. "Hot spots" where homeless people congregate have been observed in the western portion of the city on N. Azusa Avenue near the Wal-Mart, Albertsons and CVS parking lots, in the Downtown area, and along N. Grand Avenue and N. Glendora Avenue on the east side of the city (Figure D-32). These areas have relatively good access to commercial services such as grocery stores, job opportunities, medical clinics and bus service provided by Metro, as discussed previously in the analysis of transportation opportunity (see Figure D-20).

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

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

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.

Figure D-32
Homeless Concentrations – Covina



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 Covina Housing Authority, Los Angeles County and other San Gabriel Valley cities to facilitate the establishment of additional facilities and services to address the needs of the homeless population. In 2017 the City applied for and received a \$30,000 grant from the County of Los Angeles to fund the preparation of a City Plan to Combat Homelessness, which was completed in 2018. This Plan assessed available resources to address the homeless challenge; identified opportunities for Covina to collaborate with the County of Los Angeles and neighboring cities on initiatives to address

homelessness; and established goals and supporting strategies. Subsequently in 2022 the City approved a lease agreement with Covina Housing Authority for two parcels to be used for a navigation center. In September 2022, the City received a grant from the San Gabriel Regional Housing Trust (SGVRHT) for technical assistance that includes a design plan for a 30-bed homeless facility with support services such as counseling for substance abuse domestic violence, employment, health care and mental health as well as project planning and development management. It is anticipated that the design plan will be completed by December 2023.

5) Displacement Risk

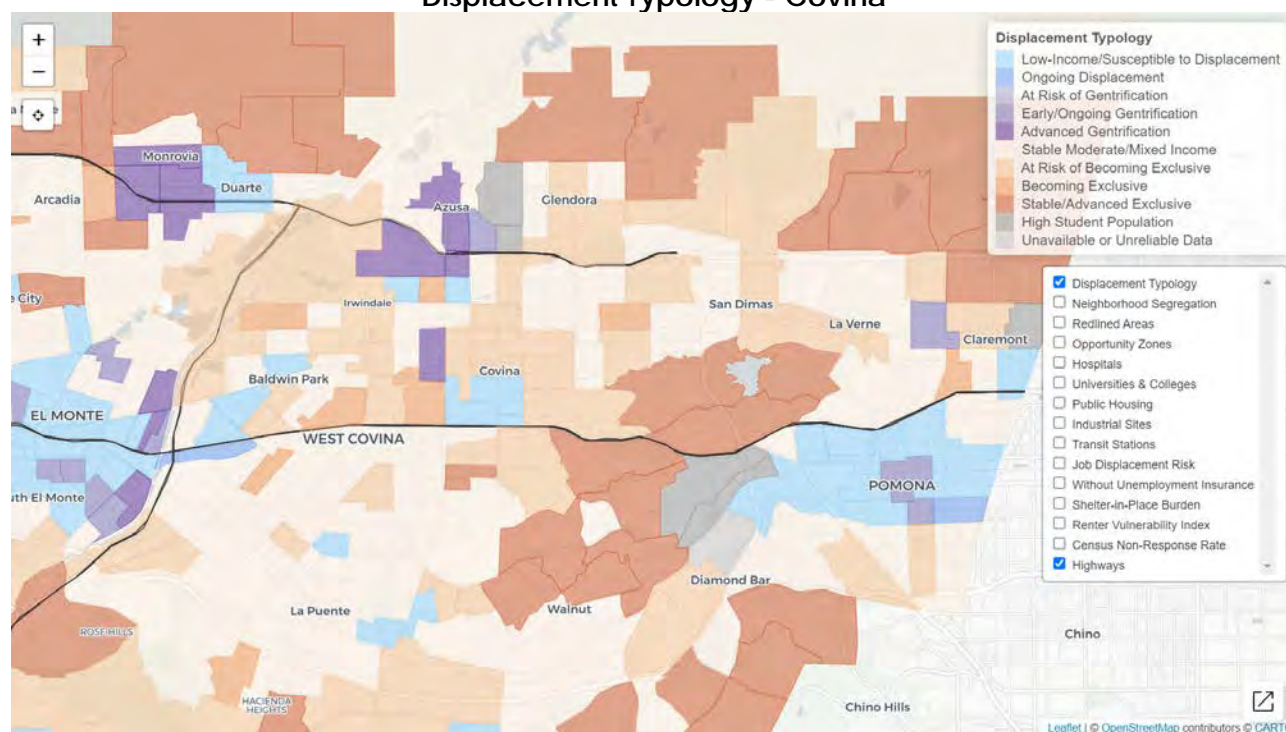
In 2016, the Urban Displacement Project⁷ team developed a neighborhood change database to help stakeholders better understand where neighborhood transformations are occurring and to identify areas that are vulnerable to gentrification and displacement in Southern California. The database includes Los Angeles, Orange, and San Diego counties, with gentrification and sociodemographic indicators based on data from the Census Bureau American Community Survey and shows whether each Census tract gentrified between 1990 and 2000; gentrified between 2000 and 2015; gentrified during both of these periods; or exhibited characteristics of a “disadvantaged” tract that did not gentrify between 1990 and 2015.

Based on this neighborhood change database, the team found that the areas most susceptible to displacement in the San Gabriel Valley are portions of Pasadena, Altadena, Monrovia and Duarte, as well as the cities in the southern portion of the Valley. Figure D-32 shows the displacement typology levels for Covina and surrounding areas. Most of the area east of Azusa Avenue, south of Badillo Street, west of Barranca Avenue and north of the I-10 freeway is characterized as *Low Income/Susceptible to Displacement* while other portions of the city are characterized as *Stable Moderate/Mixed Income*, *At Risk of Becoming Exclusive*, *Becoming Exclusive*, *Stable/Advanced Exclusive*, or *Advanced Gentrification*.

As noted in the Housing Plan, Program 2.1 Adequate Sites to Accommodate Housing Needs includes a commitment to ensure compliance with legal protections and replacement housing requirements for existing tenants who may be displaced by new developments. The City also promotes the maintenance and rehabilitation of deteriorating housing units through its CDBG-funded 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 provides funding for 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. Since 2018 approximately 20 applications have been processed under this program.

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

Figure D-32
Displacement Typology - Covina



As discussed in Section III.F of the Housing Needs Assessment, there are two assisted low-income rental housing developments in Covina that are at risk of conversion to market rate in the next 10 years. Program 1.4 Preservation of Assisted Housing is included in the Housing Plan to facilitate the preservation of these affordable units.

F. Local Knowledge and Other Relevant Factors

The City of Covina is located approximately 23 miles east of downtown Los Angeles and just north of the San Bernardino Freeway (Interstate 10) in the eastern San Gabriel Valley. The City was incorporated in 1901, and like many communities in the region was originally settled in the late 1800s as an agricultural area. By the turn of the Century, because of favorable climatic and soil conditions and the construction of the Southern Pacific Railroad and the regional-oriented Pacific Electric streetcar network, both of which traversed the City, citrus became the predominant crop. At one time, Covina was the largest shipper of oranges in Los Angeles County.

The citrus industry remained the mainstay of the local economy through World War II, after which the citrus groves gave way to the post-war building boom. Between 1950 and 1960, suburban growth resulted in a City population increase of over 400% and a major expansion to the community's original one square-mile area. Much of this growth was also spawned by the opening of the San Bernardino Freeway in 1954, which provided more convenient access to downtown Los Angeles and surrounding areas. After the rapid development in the 1950s and '60s, slower growth continued in subsequent decades, and included more commercial and industrial developments.

The City's topography is generally flat and organized on a typical grid network of suburban roads. The nearby San Bernardino, Foothill, and Orange Freeways and the Metrolink Commuter Rail Line (formerly Southern Pacific Railroad) and Covina Transit Center provide good access to other areas of metropolitan Los Angeles.

Similar to most other areas of the San Gabriel Valley, Covina is predominantly built-out, and future growth is accommodated mainly through redevelopment of underutilized properties (see more detailed discussion of potential sites for housing development in Appendix B). The City's land use pattern is fairly well-established, with predominantly single-family houses, lower-density apartment and condominium complexes, and low-rise commercial and industrial uses dispersed throughout the community. For a suburban community, Covina possesses a relatively high percentage of commercial and industrial activities, which creates opportunities for higher-density residential and mixed-use redevelopment.

Recent years have seen a renewed interest in the historical practice of "redlining" and other discriminatory housing practices in the home mortgage and real estate industry. In the 1930s, the Federal Housing Administration designated areas of cities in which they would not insure mortgages. Using red ink, lenders identified parts of a city that were considered at high risk of default. The Home Owners Loan Corporation (HOLC) rated (redlined) certain areas across the nation as hazardous, and "yellow lined" areas thought to be declining. These areas and the residents living there were more often denied credit for home purchases, which perpetuated areas with low rates of ownership and limited upward mobility. According to the National Community Reinvestment Coalition⁸ the HOLC maps historically showed central Covina as a yellow-lined neighborhood.

Other types of discriminatory real estate practices such as restrictive covenants prohibiting certain racial, ethnic or religious groups were common throughout the country in the past. Such deed restrictions were generally created and enforced by private parties rather than local governments, and the City is not aware of any such covenants in Covina. Such discriminatory covenants were outlawed years ago, and any deed restrictions in new developments in Covina must be reviewed and approved by the City Attorney for compliance with fair housing law.

The California Fair Housing Act and the National Housing Act officially prohibited redlining and other discriminatory housing practices more than 50 years ago. To address the factors that contribute to segregation or different levels of investment among historically red- and yellow-lined communities, the City has targeted reinvestment in the downtown area, including capital improvements (streets, sidewalks, landscaping, etc.), housing rehabilitation programs, and other programs to promote housing mobility and choice.

While Covina is a mature, stable community, it faces challenges including rapidly rising housing costs and related problems of overcrowding and cost burden, an older housing stock affected by deterioration and need for rehabilitation, and a demographic transition to a majority-minority and increasing elderly population. Covina's seniors (65 and above) make up approximately 13.6% of the total population, which is higher than the regional

⁸ <https://ncrc.org/holc/>

average, and the percentage of seniors with a disability is also higher than for the region as a whole.

Covina’s downtown district, focused on Citrus Avenue between Badillo Street and just north of San Bernardino Road, is the social, economic, and geographic heart of the community. In recent years the City’s development policies have focused on maintaining and improving existing neighborhoods while encouraging new housing and mixed-use development in areas with access to high-quality transportation and services such as the Town Center Specific Plan (TCSP), which encompasses the Covina Transit Center. In 2022, the City further expanded new housing opportunities through the adoption of the Mixed Use Overlay District, which encourages residential and mixed-use development in areas where only non-residential uses were previously allowed. These policies are consistent with public comments received during preparation and review of the draft Housing Element, which included support for new rental and for-sale housing in commercial zones and near public transit while avoiding displacement of existing lower-cost rental housing.

The City is also taking proactive steps to address homelessness and special needs housing. In 2017 the City applied for and received a \$30,000 grant from the County of Los Angeles to fund the preparation of a City Plan to Combat Homelessness, which was completed in 2018. This Plan assessed available resources to address the homeless challenge; identified opportunities for Covina to collaborate with the County of Los Angeles and neighboring cities on initiatives to address homelessness; and established goals and supporting strategies. Subsequently in 2022 the City approved a lease agreement with Covina Housing Authority for two parcels to be used for a navigation center. In September 2022, the City received a grant from the San Gabriel Regional Housing Trust (SGVRHT) for technical assistance that includes a design plan for a 30-bed homeless facility with support services such as counseling for substance abuse domestic violence, employment, health care and mental health as well as project planning and development management. It is anticipated that the design plan will be completed by December 2023.

3. Sites Inventory Analysis

Statutory Requirements

According to State law and HCD guidance⁹ the purpose of the Housing Element’s sites inventory is to identify and analyze specific parcels that are available and suitable to accommodate the regional housing need and determine whether there are sufficient and adequate sites to accommodate the RHNA by income category. The sites inventory analysis determines whether program actions must be adopted to make additional sites available with appropriate zoning, development standards, and infrastructure capacity to accommodate the new development need.

State law (AB 686) requires that a jurisdiction’s site inventory “...shall be used to identify sites throughout the community, consistent with...” its duty to affirmatively further fair housing. Sites must be identified and evaluated relative to the full scope of the assessment of fair housing (e.g., segregation and integration, racially and ethnically concentrated

⁹ https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

areas of poverty and affluence, access to opportunity, etc.). The site inventory and accompanying analysis must identify and analyze selected sites, map the location of the sites, indicate the number of projected units for each site and represent the assumed affordability (i.e., lower, moderate and above-moderate) for each site, and evaluate relative to socio-economic patterns. Importantly, the analysis ought not be limited to the identification of sites for lower-income households. Rather, it should incorporate the jurisdiction's projected housing development at all income levels and assess the extent to which that development will either further entrench or help to ameliorate existing patterns of segregation and/or exclusion of members of protected categories. Where the analysis of the inventory indicates that the community has insufficient sites appropriately zoned and located to accommodate its lower income RHNA in a manner that affirmatively furthers fair housing, the housing element must include a program to address this inconsistency, such as making additional sites available to accommodate its lower-income RHNA in a manner that affirmatively furthers fair housing. To evaluate the site inventory's consistency with the obligation to affirmatively furthering fair housing, the site inventory analysis should address:

- **Improved Conditions:** A discussion of how the sites are identified in a manner that better integrates the community with a consideration for the historical patterns and trends, number of existing households, the magnitude (e.g., number of units) of the RHNA by income group and impacts on patterns of socio-economic and racial concentrations.
- **Exacerbated Conditions:** Similar to above, an explanation of identified sites relative to the impact on existing patterns of segregation and number of households relative to the magnitude (e.g., number of units) of the RHNA by income group.
- **Isolation of the RHNA:** An evaluation of whether the RHNA by income group is concentrated in areas of the community.
- **Local Data and Knowledge:** A consideration of current, planned and past developments, investment, policies, practices, demographic trends, public comment and other factors.
- **Other Relevant Factors:** Any other factors that influence the impacts of the identification of sites to accommodate the regional housing need on socio-economic patterns and segregation. This requirement should address any pending or approved plans, other elements of the general plan and relevant portions of the housing element and site inventory analysis requirements including, but not limited to, effectiveness of past programs in achieving the goals of the Housing Element, suitability of sites, existing uses and impacts of additional development potential, including potential for displacement of residents, businesses and other community amenities and infrastructure capacity.

Based on the outcomes of the analysis, the Housing Element must summarize conclusions and directly identify policies and programs needed to address identifying and making available adequate sites to accommodate the RHNA in a manner that affirmatively furthers fair housing. Policies and programs must include "meaningful actions" beyond

combating discrimination to overcome patterns of segregation and foster inclusive, affordable and stable communities.

Specifically, the analysis must include each of the fair housing issue areas: (1) segregation and integration, (2) racially and ethnically concentrated areas of poverty (R/ECAPs), (3) access to opportunity, and (4) disproportionate housing needs, including displacement. The analysis should not be limited to the jurisdiction itself, but should include the surrounding region and an understanding of the role the jurisdiction plays in current and historical trends of segregation at a regional level.

Analysis

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

As illustrated in Appendix B, the focus of the sites inventory consists of underutilized sites in the Town Center Specific Plan area near the Metrolink rail station and in the Affordable Housing Mixed Use Overlay Zone.

The following analysis has been conducted pursuant to the AFFH requirements described above.

- Improved or Exacerbated Conditions: A discussion of how the sites are identified in a manner that better integrates the community with a consideration for the historical patterns and trends, number of existing households, the magnitude (e.g., number of units) of the RHNA by income group and impacts on patterns of socio-economic and racial concentrations. As noted in the requirements discussion above, the Housing Element must analyze each of the fair housing issue areas: (1) segregation and integration, (2) racially and ethnically concentrated areas of poverty (R/ECAPs), (3) access to opportunity, and (4) disproportionate housing needs, including displacement. The analysis should not be limited to the jurisdiction itself, but should include the surrounding region and an understanding of the role the jurisdiction plays in current and historical trends of segregation at a regional level.

Segregation and Integration. The racial and ethnic characteristics of Covina's population are analyzed in Section 2.B.1 above. As seen in Figure D-2, the percentage of non-White population is more than 60% in most areas of the city and is similar to the surrounding cities to the north, west and south. The non-White percentage is slightly lower (41-60%) at the eastern edge of the city, which is similar to the adjacent portion of San Dimas and unincorporated County islands. Racial characteristics for the larger San Gabriel Valley area are illustrated in Figure D-3. These maps indicate that there are no significant non-White population concentrations in Covina. The sites inventory maps provided in Appendix B show

that future housing development sites are located in census tracts with majority-minority populations and would not exacerbate existing racial and ethnic patterns. The small area in the southeastern portion of the city where the non-White population is lowest (41-60%) is fully developed with single-family homes where additional housing development is limited to ADUs or potential SB 9 lot splits. These areas are not well suited to large-scale multi-family development due to topography and infrastructure limitations as well as lack of high-quality transit.

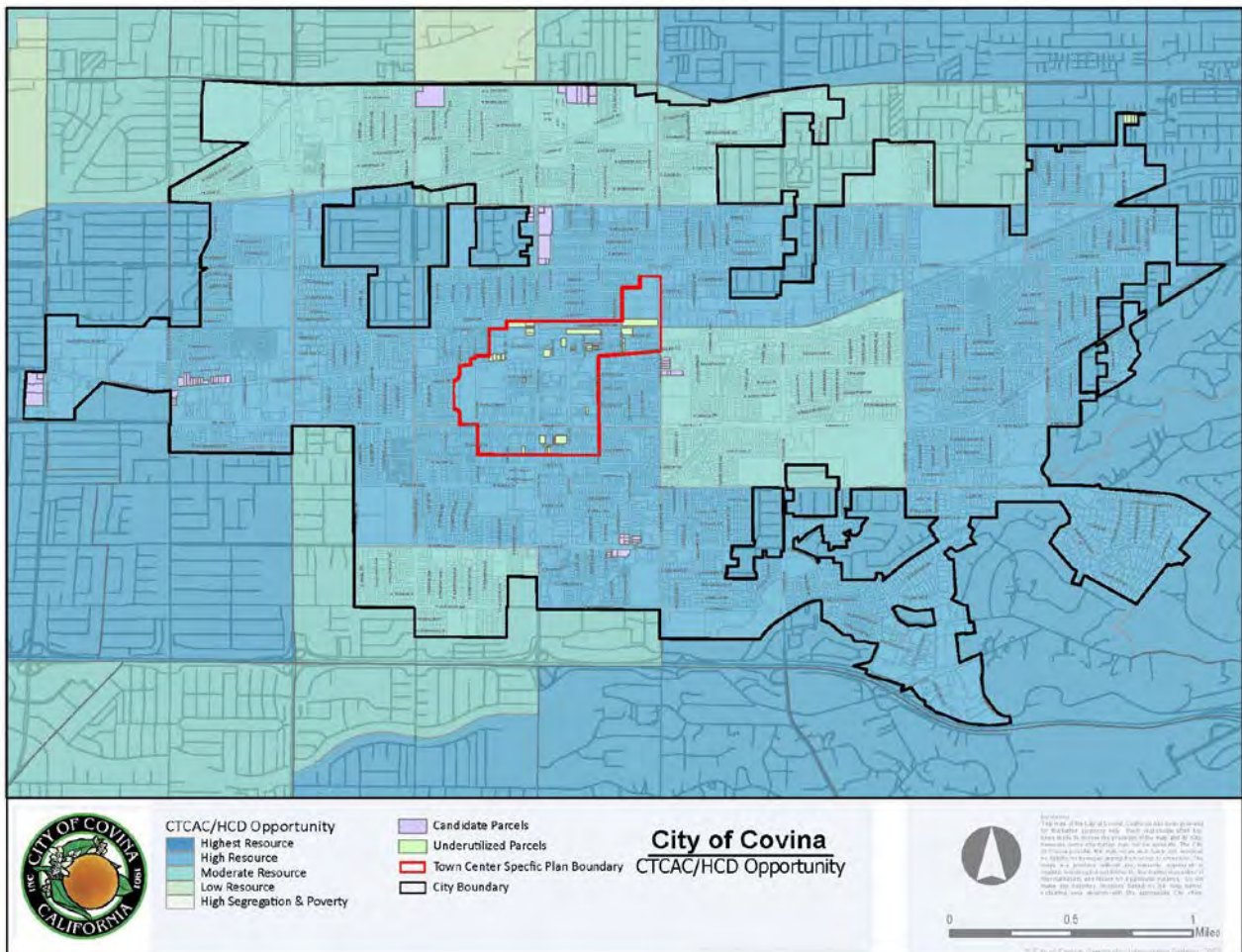
Racially and ethnically concentrated areas of poverty (R/ECAPs) and racially concentrated areas of affluence (RCAAs). R/ECAPs and RCAAs are analyzed in Section 2.C above. As shown in Figures D-10 and D-14, there are no designated R/ECAP or RCAA areas in Covina; therefore, the sites inventory would not exacerbate racially and ethnically concentrated areas of poverty or affluence.

Access to opportunity. Geographic access to opportunity is an important factor in facilitating economic mobility for disadvantaged groups. Analysis of various dimensions of opportunity is provided in Section 2.D above. As seen in Figure D-33, below, all areas of Covina are designated by the TCAC/HCD opportunity maps as either *High Resource* or *Moderate Resource*. Table D-1 shows the distribution of housing sites by census tract, resource opportunity designation, low/moderate income percentage, poverty rate, renter overpayment rate and percentage of residents with a disability. This analysis shows that over half of lower-income sites are located in *High Resource* census tracts and 70% of moderate and above-moderate-income sites are located in *High Resource* census tracts. This distribution of sites indicates that the City's inventory of potential new housing furthers fair housing and mobility objectives by providing a significant new housing opportunities in high-resource locations and does not isolate lower-income households in any particular areas with concentrations of lower-income or disabled persons.

Table D-1
Sites Inventory by Census Tract and Opportunity

Census Tract	Lower Income Sites	Moderate/Above Moderate Sites	TCAC Opportunity Category	% Low/Mod Income	% Poverty	% Renter Overpayment	% with a Disability
4037.21	242	71	High	36%	10-20%	60-80%	10-20%
4037.22	-	29	Moderate	61%	10-20%	60-80%	<10%
4054	248	-	High	41%	<10%	20-40%	10-20%
4057.02	20	85	High	60%	<10%	20-40%	10-20%
4059	388	8	Moderate	51%	<10%	60-80%	10-20%
4060	-	21	Moderate	44%	<10%	20-40%	10-20%
4061.01	-	145	High	49%	<10%	40-60%	10-20%
4061.03	64	67	Moderate	66%	10-20%	40-60%	10-20%
Totals	963	427					

Figure D-33
Sites Inventory and TCAC Opportunity Composite Scores - Covina



While former commercial and light industrial areas provide the largest component of the potential residential inventory, it is also important to recognize that existing residential neighborhoods provide substantial potential for new housing in areas of higher opportunity through ADUs and SB 9 urban lot splits.

Disproportionate housing needs, including displacement. Analysis of disproportionate housing needs and vulnerability to displacement is provided in Section 2.E.5, above. Figure D-32 shows the displacement typology levels for Covina and surrounding areas. Most of the area east of Azusa Avenue, south of Badillo Street, west of Barranca Avenue and north of the I-10 freeway is characterized as Low Income/Susceptible to Displacement while other portions of the city are characterized as Stable Moderate/Mixed Income, At Risk of Becoming Exclusive, Becoming Exclusive, Stable/Advanced Exclusive, or Advanced Gentrification. Comparison of displacement typology map with the sites inventory indicates that most areas of Covina as well as the larger San Gabriel Valley area are affected by a variety of displacement risks. To address this issue, Program 2.1 Adequate Sites to Accommodate Housing Needs includes a commitment to ensure compliance with legal protections and replacement housing requirements for existing tenants who may be displaced by new developments.

- Isolation of the RHNA. The sites inventory analysis also includes an evaluation of whether the RHNA by income group is concentrated in areas of the community. As seen in Figure D-33 above and in Appendix B, the inventory of potential housing sites is distributed among many different areas of the community and is not concentrated in any particular area. As a mature city with almost no vacant land, the greatest opportunities for new multi-family housing are found in the former commercial and light industrial areas such as the Town Center Specific Plan and the Mixed Use Overlay Zone areas. However, it is also important to recognize that existing residential neighborhoods provide substantial potential for new housing in areas of higher opportunity through ADUs and SB 9 urban lot splits. Program 2.3 in the Housing Plan includes proactive steps the City is taking to facilitate development of ADUs, and the level of interest in ADU construction has increased substantially over the past few years.

The foregoing analysis demonstrates that the sites inventory is consistent with fair housing objectives and would not exacerbate conditions or isolate affordable housing in areas of lower opportunity.

4. Contributing Factors, Goals, Policies and Actions

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

Through the participation of stakeholders, fair housing advocates, and the assessment of fair housing issues described in this appendix, the City has identified fair housing issues and contributing factors as well as meaningful actions to address those issues as described in Table D-1 below. The Housing Plan (Chapter VI) also includes Program 5.1 to implement these actions.

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

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
Fair Housing Outreach	Some residents who are in need of fair housing resources, including low-income households, persons with disabilities, racial/ethnic minorities and other protected classes, may be unaware of the fair housing resources that are available. Although information about fair	High	<ul style="list-style-type: none"> • Continue directing fair housing inquiries to the Housing Rights Center. • Continue to support the provision of housing for persons with disabilities. • Post information at the Senior Center regarding fair housing and conduct a presentation every two years at the Center about services available through the County CDC, Housing Rights Center and the City.

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
	housing services is posted on the City website and in public offices, more could be done to make this information available.		<ul style="list-style-type: none"> • In cooperation with the Housing Rights Center, contact low-income apartment complexes annually to provide education and materials about the Section 8 program including multi-lingual materials. • Publish and annually update links to fair housing information via social media. (Program 5.1)
Affordable Housing Preservation	The loss of existing affordable housing may be a significant contributing factor to fair housing and potential displacement. When subsidy contracts expire, the housing providers that often have the least economic incentive to renew their affordability restrictions are those that are located in higher opportunity areas or in areas that are gentrifying or at risk of gentrification. As discussed in Chapter III, there are two subsidized low-income developments in Covina with affordability restrictions that could expire in the next 10 years. If affordability covenants are not extended, the loss of these affordable units could contribute to segregation and displacement.	High	The City will continue to monitor units with affordability covenants that are eligible to expire during the next 10 years. To encourage the preservation of these “at-risk” units, the City will coordinate with the County and non-profit housing organizations on an annual basis to encourage the extension and/or renewal of affordability covenants, comply with noticing requirements, provide education and assistance to tenants, assist with funding, and promptly reach out to qualified entities to preserve at-risk housing units. (Program 1.4)
Access to Opportunity	Lack of access to opportunity due to high housing costs is a significant contributing factor to fair housing throughout the San Gabriel Valley area. In Covina, while access to public transportation and other resources is generally good, some portions of the city have lower economic, educational and environmental opportunity. Increasing housing opportunities in areas with	High	Several programs in the Housing Plan are intended to improve access to opportunity: <ul style="list-style-type: none"> • Programs 1.3 Section 8 Rental Assistance and 1.4 Preservation of Assisted Housing improve the ability of lower-income households to afford suitable housing in areas with better access to opportunity. • Programs 2.1 Adequate Sites to Accommodate Housing Needs and 2.2 Redevelopment of Underutilized Sites will expand housing opportunities by amending zoning regulations to

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
	good opportunity would make it easier for low-income households to access the types of services and amenities that further social mobility.		encourage new housing in high-opportunity areas. <ul style="list-style-type: none"><li data-bbox="954 285 1445 405">• Program 3.1 First-Time Homebuyer Assistance will provide financial assistance to households wishing to purchase their first home.