

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

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

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

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

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

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