

Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form
All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.
Appeals and supporting documentation should be submitted to housing@scaq.ca.gov.
Late submissions will not be accepted.

Date:

10/26/20

Jurisdiction Subject to This Appeal Filing:
(to file another appeal, please use another form)

Filing Party (Jurisdiction or HCD)

City of El Monte

Filing Party Contact Name

Nancy Lee

Filing Party Email:

nlee@elmonteca.gov

APPEAL AUTHORIZED BY:

Name: Betty Donovanik

PLEASE SELECT BELOW:

- ☐ Mayor
- ☐ Chief Administrative Office
- ☐ City Manager
- ☐ Chair of County Board of Supervisors
- ☒ Planning Director
- ☐ Other: _____

BASES FOR APPEAL

- ☐ Application of the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029)
- ☒ Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
 - ☐ Existing or projected jobs-housing balance
 - ☐ Sewer or water infrastructure constraints for additional development
 - ☒ Availability of land suitable for urban development or for conversion to residential use
 - ☐ Lands protected from urban development under existing federal or state programs
 - ☐ County policies to preserve prime agricultural land
 - ☐ Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
 - ☐ County-city agreements to direct growth toward incorporated areas of County
 - ☐ Loss of units contained in assisted housing developments
 - ☐ High housing cost burdens
 - ☐ The rate of overcrowding
 - ☐ Housing needs of farmworkers
 - ☐ Housing needs generated by the presence of a university campus within a jurisdiction
 - ☐ Loss of units during a state of emergency
 - ☐ The region's greenhouse gas emissions targets
 - ☐ Affirmatively furthering fair housing
- ☐ Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

FOR STAFF USE ONLY:

Date _____

Hearing Date: _____

Planner: _____

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Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):

Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.

See Attachment "A".

Brief Description of Appeal Request and Desired Outcome:

The City of El Monte is requesting that the Sixth Cycle RHNA number be reduced from 8,481 units to 5,345 units due to the lack of availability of land suitable for urban development or for conversion to residential use.

Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):

Reduced 3,136 Added 0

List of Supporting Documentation, by Title and Number of Pages

(Numbers may be continued to accommodate additional supporting documentation):

1. Residential Construction Projections for 6th RHNA Cycle, 1 page
2. Downtown Main Street Specific Plan Building Intensity, 1 page
3. Gateway Specific Plan and General Plan description, 2 pages

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Date _____

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Attachment "A"

The City of El Monte is appealing the Sixth Cycle RHNA based on Local Planning Factors as follows:

Availability of Land Suitable for Urban Development or for conversion to residential use – The City of El Monte is built out with existing developments and the availability of land is limited. While the City is primarily built out, City staff has diligently worked to find opportunities for residential development and prepared an annual projection based on a 20 year build out in areas (described below) of the City that allows for higher densities and additional residential units (i.e. Accessory Dwelling Units/Infill Developments). This information is based on current development projections with an annual 5% increase.

The first area, known as the El Monte Gateway, encompasses 60.15 acres, and is located around the MTA Bus Terminal, and has been designated to provide higher residential densities per the General Plan. A specific plan has been adopted which allows up to 1,850 residential units to complement transit-oriented uses at the MTA Station. City staff estimates that 1,700 additional units would be constructed within the next 20 years. Within the 6th RHNA cycle, City staff projects the construction of 680 units.

The second area is the Downtown Core, which is 115 acres in size, and is adjacent to the City's Metrolink Station, and also designated to provide higher residential densities. The adopted specific plan for the downtown core specifies the potential for 2,200 new residential units. The City estimates that 2,000 units could be built within the next 20 years. Within the 6th RHNA cycle, City staff projects the construction of 800 units.

The third, fourth, and fifth areas are the City's Mixed-Use Corridors located along Garvey Avenue, Peck Road, and Durfee Avenue. While the areas listed below provide opportunity to additional densities, the lots that front these main corridors are smaller and narrower in size and may constraint development densities. However, it assumes greater densities for the Peck and Garvey Mixed-Use corridors (instead of an average density of 25 units per/acre and 30 units per/acre, it has been increased to 30 units/acre and 35 units/acre, respectively).

- Garvey Ave – at 50 acres in size and an average density of 35 units/acre, City staff projects the construction of 700 units within the 6th RHNA cycle.
- Peck Road – at 45 acres in size and an average density of 30 units/acre, City staff projects the construction of 450 units within the 6th RHNA cycle.
- Durfee Avenue – at 40 acres in size, and an average density of 25 units/acre, City staff projects the construction of 320 units within the 6th RHNA cycle.

The sixth area where opportunities for additional units are projected are within zones in the City that allow for Accessory Dwelling Units (ADU), which are single, multi, and mixed use zones. For 2020, staff estimates issuing permits for 80 ADUs. Therefore, factoring a 5% annual increase, City staff projects the construction of 760 ADU's within the 6th RHNA cycle.

Lastly, the seventh area is located within single-family and multi-family zones. Since the City is built out, the availability of infill lots are limited. However, staff estimates that 1,635 units constructed within the 6th RHNA Cycle.

As demonstrated above, the City has been active in considering suitable higher density housing sites or land suitable for urban development in locations that are within close proximity transit. Additionally, the numbers shown above all reflect greater annual growth, compared to 2014-2020. This demonstrates that the City is open to providing more housing, however, the draft 6th Cycle RHNA number to produce 8,481 units within a six year period is not realistic due to availability of suitable land. Based on the information provided above and within the supporting documentation attached to this appeal, the 6th Cycle RHNA number of 5,345 is more realistic and appropriate number.

Residential projections for RHNA 6th Cycle

Area/Zone	20 Year Build-Out	Annual Projection	8-Year 6 th Cycle City Projection
Downtown Specific Plan	2,000	100	800
Gateway Specific Plan	1,700	85	680
Garvey Mixed-Use Corridor, 50 acres (high transit, high services)	Average of 35 u/acre 1,750	87	700
Peck Mixed-Use Corridor, 45 acres (less transit, high services)	Average of 30 units/acre 1,125	56	450
Durfee Mixed-Use Corridor, 40 acres (less transit, less services)	Average of 20 u/acre 800	40	320
Accessory Dwelling Units (ADUs)	Baseline of 80 units for 2020; 5% increase annually	95	760
Single-family and multi-family zones (i.e. infill development)	Baseline of 175 units annually for 2015-2020; 5% increase annually	200	1,635
		TOTAL:	5,345

City Council. If a use that is not listed in the Permitted Uses Table is allowed pursuant to this procedure, then a development application for said use may be filed and processed in the manner outlined herein.

6.5 NON-CONFORMING USES AND STRUCTURES

See Chapter 17.14 Nonconforming Provisions of the EMMC.

6.6 EXCEPTIONS

Exceptions to Specific Plan requirements include minor modifications to height, yard, and building conditions, as well as other exceptions and modifications as described in Chapter 17.20 Modification-Variance, of the El Monte Municipal Code. Requests for exceptions shall be processed pursuant to the procedures set forth therein.

6.7 SPECIFIC PLAN BUILDING INTENSITY

As part of this Specific Plan effort, a CEQA review was completed for the potential development of a total net new pool of 2,200 net new residential dwelling units and 500,000 net new square feet of commercial, non-residential development within the Specific Plan Area. This maximum allowable potential development within the Specific Plan Area does not take into account environmental constraints or application of all development standards. It is anticipated that buildout will take place over time and thus it is unknown when complete buildout of the Specific Plan Area will occur. In order to ensure that the cumulative buildout assumed for the overall Specific Plan Area is not exceeded, the Economic Development Director or his/her designee will track the amount of net new residential units and commercial, non-residential square footage developed under this Specific Plan (by right and under the DOR), and will allocate Residential DOR credits and Commercial DOR credits until the pool is fully utilized or the pool is increased by subsequent CEQA study.

6.8 SPECIFIC PLAN AMENDMENTS

Amendments to a Specific Plan may be requested by the

applicant or its successors. Amendments to the approved Plan shall be classified as major or minor amendments. Upon receipt of an amendment application, the Economic Development Director shall determine if the proposed amendment constitutes a major or minor amendment. Amendments to a Specific Plan may be requested by the applicant or its successors. Amendments to the approved Plan shall be classified as major or minor amendments. Upon receipt of an amendment application, the Economic Development Director shall determine if the proposed amendment constitutes a major or minor amendment

A. *Major Amendments.* Major Amendments to an approved Specific Plan shall be considered by the Planning Commission and City Council at duly noticed public hearings. An amendment will be deemed major if it involves one or more of the following changes:

1. A change in the boundary of the Specific Plan;
2. An increase in the number of dwelling units for the Specific Plan area that is greater than the maximum stated in the Specific Plan;
3. An increase in the floor area for any non-residential land use that results in the floor area exceeding the minimum stated in the Specific Plan;
4. Any change in land use or density that is likely to negatively impact or burden public facilities and utilities infrastructure as determined by the City Engineer;
5. Any change in land use or density that is likely to negatively impact or burden circulation adjacent to the Specific Plan area or to the overall major street system, as determined by the City Engineer; or
6. Any other proposed change to the Specific Plan or the conditions of approval that substantively alters one or more of its components as determined by the Economic Development Director.

B. *Minor Amendments.* Amendments not meeting one or

rehabilitation of existing historic resources, implementation of the Emerald Necklace concepts along the Rio Hondo River adjacent to the site, the integration of a pedestrian/trail system throughout the development and the establishment of pedestrian connections to adjacent commercial and residential areas.

Improve Connectivity - The existing Metro Transit Center stands as an isolated island in Downtown El Monte, with poor pedestrian connections to surrounding residential and commercial areas. As a result, utilization of mass transit is not as high as would normally be expected given the extensive transit resources and system connections available. The proper redevelopment of the Gateway site has potential to reconnect the various sections of El Monte, generating new economic activity and increasing bus ridership. If successful, the project could stimulate additional infrastructure investments, such as an underpass connection to the Transit Center to the Flair Park business center located south of Interstate 10 and pedestrian bridges connecting the Valley Mall to the east, that create even more connections to support Downtown El Monte.

Increase in Housing Supply - This project will provide badly needed housing in a region of severe overcrowding and extremely high housing costs. The Gateway Specific Plan will have a mix of housing types and sizes, designed to accommodate the needs of a diverse population. Of the 1,850 dwelling unit proposed, approximately 80% for sale and 20% will be rental. Because the site is located within the boundaries of the Downtown El Monte Project Redevelopment Area, a goal has been established to make 15% of the units affordable to low- and moderate-income households.

Creation of New Jobs for the Community - The mixed use nature of this project means that it will create significant employment opportunities for the residents of El Monte, both during and after completion of construction. There will be a broad range of occupational opportunities, from hourly retail, to service, to clerical and professional. The area will establish strategic alliances with the Rosemead-El Monte Adult School, the Rio Hondo Community College, the Workforce Improvement Board, and other service providers to identify job opportunities and recruit local residents into job training programs designed to qualify participants for the jobs that the project will create. An estimated 3000+ jobs are forecast to be created at this location based on the proposed retail commercial and office professional space forecast to be constructed at the area.

Establishment of a Regional Education Center- The project will contain a number of features designed to establish the area as a regional learning center. The project will include a child development center, a conference center adjacent to the hotel, and other facilities designed to provide lifetime learning opportunities to residents of the area as well as the larger community. In addition to the strategic alliances established to support job training programs, the area will include satellite classroom space for use by community colleges, Cal State Los Angeles, and other public educational institutions.

Land Use Element



Industrial Business Park

Industrial uses, like the one pictured above, typify the type and scale of development and floor area ratios desired in El Monte.



Professional Office Park

Midrise offices in Flair Park represent the professional office land use designation.

Mixed/Multiuse

This designation allows mixed/multiuse housing along corridors. Mixed/multiuses can be vertically integrated (e.g., commercial frontage with residential and/or office uses above the first floor) or horizontal (housing adjacent to commercial and office uses). The scale, size, and mix of land uses vary based on the location and character of surrounding land uses. Densities of 25 to 35 units per acre and/or FAR of up to 1.00 are allowed.

Industrial Business Park

The Industrial Business Park designation is intended primarily for the Northwest Planning Area. Allowable uses include a mix of sustainable manufacturing, processing, office, warehousing, and distribution uses that generate employment, minimize traffic, and are compatible with residential neighborhoods. Supporting and limited retail uses are also allowed. Industrial uses are allowed at an intensity of up to 1.0 FAR.

Downtown Core

The Downtown Core allows a range of land uses and development types that create a vibrant mixed-income and multiuse environment. Retail, civic facilities, office, entertainment, transit, hotels, light industrial, high density residential uses, daycare centers, public, and cultural facilities are allowable uses. The Downtown Core allows residential densities ranging from 0 to 25 units per acre and commercial intensities ranging from 0.0 to 1.5 FAR.

El Monte Gateway

The El Monte Gateway Project applies primarily to an area comprised by the MTA Bus Terminal. Pursuant to a specific plan, this area is slated to provide up to 1,850 residential units, up to 1 million square feet of commercial, entertainment uses, and public parkland and open space. This project is intended to complement transit-oriented uses at the MTA station.

Professional Office Park M-2

The Professional Office Park designation is intended for Flair Park. Typical uses envisioned for this area include national or regional offices, financial institutions, government, Fortune 500 companies, and medical-related offices. This area is intended for midrise office buildings with an FAR of up to 1.5 and limited supporting retail, services, hospitality, and other uses. Until a Specific Plan is prepared for the area, the FAR limits are 1.5 for buildings north of Telstar and 0.75 south of Telstar.