Western Riverside Council of Governments
Planning Directors Committee

REVISED AGENDA

Thursday, April 13, 2023
9:30 AM

Western Riverside Council of Governments
3390 University Avenue, Suite 200
Riverside, CA 92501

Committee members are asked to attend this meeting in person unless remote accommodations have previously been requested and noted on the agenda. The below Zoom link is provided for the convenience of members of the public, presenters, and staff support.

Remote Meeting Locations
Corona City Hall
400 S. Vicentia Avenue
Planning & Development Conference Room
Corona, CA 92882

March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Public Zoom Link
Meeting ID: 841 1179 0106
Passcode: 415619
Dial in: (669) 900 9128 U.S.

In compliance with the Americans with Disabilities Act and Government Code Section 54954.2, if special assistance is needed to participate in the Planning Directors Committee meeting, please contact WRCOG at (951) 405-6706. Notification of at least 48 hours prior to meeting time will assist staff in assuring that reasonable arrangements can be made to provide accessibility at the meeting. In compliance with Government Code Section 54957.5, agenda materials distributed within 72 hours prior to the meeting which are public records relating to an open session agenda item will be available for

inspection by members of the public prior to the meeting at 3390 University Avenue, Suite 200, Riverside, CA, 92501.

In addition to commenting at the Committee meeting, members of the public may also submit written comments before or during the meeting, prior to the close of public comment to lfelix@wrcog.us.

Any member of the public requiring a reasonable accommodation to participate in this meeting in light of this announcement shall contact Lucy Felix 72 hours prior to the meeting at (951) 405-6706 or lfelix@wrcog.us. Later requests will be accommodated to the extent feasible.

The Committee may take any action on any item listed on the agenda, regardless of the Requested Action.

1. CALL TO ORDER (Travis Randel, Chair)

2. PLEDGE OF ALLEGIANCE

3. ROLL CALL

4. PUBLIC COMMENT

At this time members of the public can address the Committee regarding any items within the subject matter jurisdiction of the Committee that are not separately listed on this agenda. Members of the public will have an opportunity to speak on agendized items at the time the item is called for discussion. No action may be taken on items not listed on the agenda unless authorized by law. Whenever possible, lengthy testimony should be presented to the Committee in writing and only pertinent points presented orally.

5. CONSENT CALENDAR

All items listed under the Consent Calendar are considered to be routine and may be enacted by one motion. Prior to the motion to consider any action by the Committee, any public comments on any of the Consent Items will be heard. There will be no separate action unless members of the Committee request specific items be removed from the Consent Calendar.

A. Summary Minutes from the February 9, 2023, Planning Directors Committee Meeting

Requested Action(s): 1. Approve the Summary Minutes from the February 9, 2023, Planning Directors Committee meeting.

B. 2022 Fee Comparison Analysis Update - Final Report

Requested Action(s): 1. Receive and file.

6. REPORTS / DISCUSSION

Members of the public will have an opportunity to speak on agendized items at the time the item is called for discussion.

A. Good Neighbor Guidelines for Siting New and/or Modified Warehouse / Distribution Facilities

Requested Action(s): 1. Receive and file.

B. Presentation on Fire Hazard Maps

Requested Action(s): 1. Receive and file.

C. REAP SRP 2.0 Local Housing Assistance Requests

Requested Action(s): 1. Receive and file.

D. Housing Element Compliance

Requested Action(s): 1. Receive and file.

7. REPORT FROM THE DEPUTY EXECUTIVE DIRECTOR
Chris Gray

8. ITEMS FOR FUTURE AGENDAS
Members are invited to suggest additional items to be brought forward for discussion at future Committee meetings.

9. GENERAL ANNOUNCEMENTS
Members are invited to announce items / activities which may be of general interest to the Committee.

10. NEXT MEETING
The next Planning Directors Committee meeting is scheduled for Thursday, June 8, 2023, at 9:30 a.m., in WRCOG's office at 3390 University Avenue, Suite 200, Riverside.

11. ADJOURNMENT

Planning Directors Committee

Minutes

1. CALL TO ORDER

The meeting of the WRCOG Planning Directors Committee was called to order by Vice-Chair Dianne Guevara at 9:31 a.m. on February 9, 2023, on the Zoom platform.

2. PLEDGE OF ALLEGIANCE

Vice-Chair Guevara led members and guests in the Pledge of Allegiance.

3. ROLL CALL

- City of Banning - Adam Rush
- City of Beaumont - Carole Kendrick
- City of Calimesa - Kelly Lucia
- City of Corona - Joanne Coletta
- City of Eastvale - Gustavo Gonzalez
- City of Jurupa Valley - Dianne Guevara (Vice-Chair)
- City of Lake Elsinore - Richard MacHott
- City of Menifee - Cheryl Kitzerow
- City of Moreno Valley - Sean Kelleher
- City of Murrieta - Jarret Ramaiya
- City of Perris - Kenneth Phung
- City of Riverside - Maribeth Tinio
- City of San Jacinto - Kevin White*
- City of Temecula - Matt Peters*
- City of Wildomar - Matt Bassi
- County of Riverside - John Hildebrand
- March JPA - Jeffrey Smith
- Riverside Transit Agency - Jennifer Nguyen

* Arrived after Roll Call

4. PUBLIC COMMENTS

Arnold San Miguel from SCAG announced that the next Tool Box Tuesday is scheduled for February 21, 2023, at 1:00 p.m. This will summarize the findings of three temporary traffic demonstrations conducted in the SCAG region and how our jurisdiction can implement our own safety demonstrations. A webinar is scheduled for Wednesday, February 22, 2023, at 11:00 a.m. on understanding SCAG's curbside management strategy.

5. CONSENT CALENDAR – (Banning / Perris) 15 yes; 0 no; 2 abstentions. The Cities of Moreno

Valley and Riverside abstained. The City of San Jacinto did not respond. Item 5.A was approved.

A. Summary Minutes from the December 8, 2022, Planning Directors Committee Meeting

Action:

1. Approved the Summary Minutes from the December 8, 2022, Planning Directors Committee meeting.

6. REPORTS / DISCUSSION

A. Standardized Plans for Middle Income Housing

Damien O'Farrell, President and CEO of Parkview Legacy Foundation, provided a presentation to gauge member agencies' interest in incentivizing middle-income housing that would be funded by REAP 2.0. REAP 2.0 allows funding for creative means to increase housing production with a focus on infill housing and transformative regional economic development. Current norms are large, single-family homes that are out of reach for middle-income residents. Missing Middle-type developments are being proposed that include a variety of housing types to increase affordability.

This incentivization would be created with Standardized Plans for Middle Income Housing, as State guidelines encourage standardized plans as part of the Pro-Housing Designation Program. Activities may include identification of opportunity sites, policy changes, feasibility studies, outreach and educational materials, development, and design of standardized plans, including plan check, for missing middle type housing.

Any interested agencies should reach out to Damien O'Farrell (damien@parkviewlegacy.org) or Stacy Cumberbatch (stacy@opportunityriverside.com).

Action:

1. Received and filed.

B. Mitigating Wildfire Impacts on Development Projects Under CEQA

Suzanne Peterson, WRCOG Staff Analyst, summarized the CEQA Wildfire Mitigation Guidance for Proposed Developments from the California State Attorney General. Wildfires are posing an increasing threat to people and the environment, as more acres of California have burned in the last decade than in the last 90 years.

The first part of the Guidance document focuses on analyzing a project's impact on wildfire risk which includes project density, location in the landscape, and water supply and infrastructure.

The second part of the Guidance document focuses on analysis of a project's impact on evacuation and emergency access. This includes things like analyzing roadway capacity, impacts on existing evacuation plans and access, and travel times under various scenarios.

The final part of the Guidance reviewed mitigation measures. Mitigation measures are driven by the analysis of different factors (project density, landscape, infrastructure, emergency access, etc.). Sometimes it can be a challenge to assess these variables. Agencies are encouraged to use fire

modeling, traffic modeling, and other spatial and statistical analyses to quantify the risks and potential impacts. The report emphasized home hardening, which would upgrade building materials and installation techniques to increase a structure's resistance to fire, heat, flames, and embers beyond the bare minimum required by codes. Additional mitigation measures would require having underground powerlines, infill development, and construction of additional points of ingress and egress, and modification of evacuation routes.

Fire Hazard Severity Zones were briefly addressed. CalFIRE is currently updating the State Responsibility Area Maps and will soon be updating the Local Responsibility Area Maps. Additional information will be provided to the PDC on a future agenda item.

Action:

1. Received and filed.

C. Summary of Proposed Projects for Regional Early Action Planning Grant Program - Subregional Partnership Program (SRP) 2.0

Suzanne Peterson, WRCOG Staff Analyst, presented information on the proposed activities for SCAG's Subregional Partnership Program (SRP). SCAG is set to receive approximately $246M in Regional Early Action Planning Grants of 2021 (REAP 2.0) funding. The REAP 2.0 SRP Program provides COGs with REAP funding on a non-competitive basis. WRCOG is set to receive approximately $1.6M. Assistance will be provided on a first-come-first-served basis, and may also be distributed based upon which agency has not yet received assistance under the first round of REAP.

WRCOG is proposing to offer local assistance to cities on Housing Element-related program and activities. Examples include application streamlining, zoning amendments, developing informational materials, and municipal code amendments. WRCOG is also proposing to offer assistance with the Pro-housing Designation application, which will provide incentives to cities and counties in community development programs and will open WRCOG cities up to more funding opportunities.

WRCOG staff will bring the list of proposed activities to the Executive Committee prior to submitting a formal application to SCAG. Planning Directors Committee members are asked to provide feedback by February 16, 2023, so that comments may be incorporated in the report being presented to the Executive Committee in March.

Action:

1. Received and filed.

D. Regional Early Action Planning (REAP) 2.0 Programs to Accelerate Transformative Housing (PATH) Program, Draft Application

Zach Gardea from SCAG reported that SCAG has drafted the PATH Program application template and is seeking input.

The PATH Program is one of three broad programs developed for SCAG's $246M REAP 2.0 Program and will provide $89M in grant funding through a competitive evaluation process for projects with transformative and significant beneficial impacts accelerating infill development that facilitates housing supply, choice, and affordability; affirmatively furthering fair housing; and reducing vehicle miles

traveled. The selection panel will use a five-point scale to rate questions under the five PATH Program criteria, although SCAG is currently searching feedback from the community on the questions and point system. SCAG staff will be available to provide application assistance and to discuss project proposals, with application workshops and weekly office hours beginning in early April 2023.

The draft PATH application can be downloaded on SCAG's REAP 2.0 webpage at https://scag.ca.gov/reap2021.

Action:

1. Received and filed.

7. REPORT FROM THE DEPUTY EXECUTIVE DIRECTOR

Chris Gray, WRCOG Deputy Executive Director, reported that the April meeting of the Planning Directors Committee, and subsequent meetings, will be held in person. Members of the Committee wishing to participate in the meeting remotely would have to comply with the Brown Act requirements, and should contact WRCOG staff.

8. ITEMS FOR FUTURE AGENDAS

Topics for future agendas include:

- Census Urban Area boundary
- RTA's Sustainable Service Plan
- Housing Element compliance / non-compliance, pro-housing designation, and next steps on SCAG's SED development.

Committee member Matt Bassi asked about the California Department of Housing & Community Development (HCD) refund for grant money.

Mr. Gray said he would reach out to HCD and provide a follow up.

9. GENERAL ANNOUNCEMENTS

There were no general announcements.

10. NEXT MEETING

The next Planning Directors Committee meeting is scheduled for Thursday, April 13, 2023, at 9:30 a.m., in WRCOG's office at 3390 University Avenue, Suite 200, Riverside.

11. ADJOURNMENT

The meeting of the Planning Directors Committee adjourned at 10:33 a.m.

Western Riverside Council of Governments
Planning Directors Committee

Staff Report

Subject: 2022 Fee Comparison Analysis Update - Final Report

Contact: Christopher Tzeng, Program Manager, ctzeng@wrcog.us, (951) 405-6711

Date: April 13, 2023

Requested Action(s):

1. Receive and file.

Purpose:

The purpose of this item is to provide the final report of the 2022 Fee Comparison Analysis Update.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #5 - Develop projects and programs that improve infrastructure and sustainable development in our subregion.

Background:

In 2016 WRCOG conducted a study to analyze fees / exactions required and collected by jurisdictions / agencies in and immediately adjacent to the WRCOG subregion. The study was presented to various WRCOG committees and subsequent presentations were completed to various City Councils in the subregion. Based on the feedback provided and the requests made for data and presentations, WRCOG indicated that the study would be updated on a consistent basis to enable jurisdictions the value of understanding the impact of fees on development and the regional economy. An updated analysis utilizing 2018 data was completed at the beginning of 2019. An update to the analysis utilizing data available in 2022 commenced in May 2022. Updates of the analysis were provided to the WRCOG Administration & Finance, Planning Directors, Public Works, and Technical Advisory Committees in late 2022. The final report will be provided to the WRCOG committees at their April / May 2023 meetings.

The information analyzed and presented in the final report is solely for information purposes. WRCOG is not proposing any fee updates as part of the Fee Comparison Analysis.

Overview

The update to the Fee Comparison Analysis follows the same methodology as in 2016 and 2018, and updates the fee structures of the various fees. The Analysis provides WRCOG jurisdictions with comprehensive fee comparisons and also discusses the effect of other development costs, such as the cost of land and interest rates, within the overall development framework. Another key element of this study is an analysis documenting the economic benefits of transportation investment. Summary and comparison data for WRCOG member agencies is provided in the final report in Attachment 1.

Fee Comparison Methodology

In addition to the jurisdictions within the WRCOG subregion, the study analyzed sample jurisdictions within the Coachella Valley, San Bernardino County, and the northern portion of San Diego County. The inclusion of additional neighboring / peer communities allows for consideration of relative fee levels between the WRCOG subregion and jurisdictions in surrounding areas that may compete for new development.

Land Uses and Development Prototypes

Fee comparisons have been conducted for five key land use categories, "development prototypes," including single-family residential, multi-family residential, office, retail, and industrial developments. Since every development project is different, and because fee structures are often complex and derived based on different development characteristics, it is helpful to have "development prototypes" for each of the land uses studied. The use of consistent development prototypes increases the extent to which the fee comparison is an "apples-to-apples" comparison.

Development prototypical projects that were analyzed are as follows:

- Single-family residential development: 50-unit residential subdivision; 2,700 square foot homes, and 7,200 square foot lots
- Multi-family residential development: 200-unit market-rate, 260,000 gross square foot apartment buildings
- Retail development: 10,000-gross square foot retail buildings
- Office development: 20,000-gross square foot, Class A or Class B office buildings
- Industrial development: 265,000 gross square foot high-cube industrial buildings

Fee Categories

The primary focus of the analysis is on the array of fees charged on new development to pay for a range of infrastructure / capital facilities. The major categories of fees include 1) school development impact fees; 2) water / sewer connection / capacity fees; 3) city capital facilities fees; 4) regional transportation fees (TUMF in Western Riverside County); and 5) other capital facilities / infrastructure / mitigation fees charged by other regional / subregional agencies. These fees typically represent 80% to 90% of the overall development fees on new development. Additional processing, permitting, and entitlement fees are not included in this analysis. The analysis focused on development impact fees, as these fees are much larger than planning / processing fees for comparison purposes.

Service Providers and Development Prototypes

The system of infrastructure and capital facilities fees in most California jurisdictions is complicated by multiple service providers and, often, differential fees in different parts of individual jurisdictions. Multiple entities charge infrastructure / capital facilities fees – e.g., city, water districts, school districts, and regional agencies. In addition, individual jurisdictions are often served by different service providers (e.g., more than one water district or school district) with different subareas within a jurisdiction, sometimes paying different fees for water facilities and school facilities. Also, some city fees, such as storm drain fees, are sometimes differentiated by jurisdictional subareas. To maintain consistency, the

service providers utilized in the previous analyses are utilized in this analysis. Individual service providers were selected where multiple service providers were present, and an individual subarea was selected where different fees were charged by subarea.

Prior Action(s):
December 14, 2022: The Administration & Finance Committee received and filed.

November 17, 2022: The Technical Advisory Committee received and filed.

October 13, 2022: The Public Works Committee received and filed.

October 13, 2022: The Planning Directors Committee received and filed.

Fiscal Impact:
Transportation and Planning Department activities are included in the Agency's adopted Fiscal Year 2022/2023 Budget under the Transportation Department. This analysis is covered under TUMF (Fund 110) to provide additional information on development fees charged to support the TUMF Nexus Study.

Attachment(s):
Attachment 1 - WRCOG Fee Comparison Study Final Report

Report

2022-23 Analysis and Regional Comparison of Development Impact Fees in Western Riverside County

The Economics of Land Use

Prepared for:
Western Riverside Council of Governments (WRCOG)

Prepared by:
Economic & Planning Systems, Inc.

EPS #214063

January 9, 2023

Economic & Planning Systems, Inc.
800 Wilshire Boulevard
Suite 410
Los Angeles, CA 90017
213 489 3838 tel

Oakland
Sacramento
Denver
Los Angeles

www.epsys.com

Table of Contents

List of Tables

List of Figures

1. Introduction and Findings

The Western Riverside Council of Governments (WRCOG) commissioned this Report to provide increased regional understanding of development impact fees on new development in Western Riverside County. More specifically, the purpose of this report is to: (1) indicate the types and relative scale of the development impact fees placed on different land uses within WRCOG member jurisdictions, and (2) indicate the level of fees relative to overall development costs in Western Riverside County. The report is also intended to provide helpful background information on the impact of the regional Transportation Uniform Mitigation Fee (TUMF) by placing the TUMF in the context of the broader development impact fee composition, overall development costs, and other regional dynamics.

This report (the 2022-23 Study) represents an update to the 2018-19 Study, which provided similar information on development impact fees and development costs. Information in this report is primarily based fee schedules and development cost estimates from 2022, while the prior study was primarily on schedules and estimates from 2018.

This report recognizes that there are substantive and ongoing debates about the appropriate levels of development impact fees in regions throughout California and elsewhere in the United States. On the one hand, development impact fees provide revenue to support the construction of critical infrastructure and capital facilities (or in-kind capital facility development) that can generate development value, economic development, and quality of life benefits. On the other hand, these fees act as an additional development cost that can influence development feasibility and potentially impact the pace of new development. **Each fee-adopting jurisdiction must weigh the costs and benefits of potential new or increased fee levels in the context of their goals, capital improvement needs, and economic and development dynamics.**

This report considers development impact fees defined as one-time fees collected for the purposes of funding infrastructure and capital facilities.[1] Reflecting the broad range of land use and development projects in Western Riverside County, prototype development projects for single-family, multifamily, retail, Class A/B office, and large industrial use types were all selected to support comparisons of fees in different jurisdictions.

A summary of key findings is provided below, followed by a description of the organization of this report.

[1] As used in this report and discussed further below, the phrase "development impact fee" includes all fees adopted pursuant to the Mitigation Fee Act and other monetary exactions due at the time of development. The term "fee," as used in this report, means "development impact fee."

Summary of Findings

FINDING #1: New development in Western Riverside County pay a wide range of one-time infrastructure/capital facilities associated fees with different public agencies.

New development in Western Riverside County is required to pay development impact fees to help fund:

- Water and Sewer Facilities
- School Facilities
- Regional Transportation Infrastructure
- Additional Local Infrastructure/Capital Facilities (local transportation, parks and recreation, public facility, community/civic facilities, and storm drain infrastructure).
- Subregional/Area Fees (habitat mitigation fees, Road and Bridge Benefit Assessment Districts, and other area-specific infrastructure/capital facilities fees).

These fees are set/administered by a combination of water districts, school districts, individual cities, the County, the Western Riverside Council of Governments, the Western Riverside County Resource Conservation Authority, and other special districts.

- **Fees for each land use type have increased on average by between 6.9 and 24.5 percent since the prior 2018-19 Study.** As shown in **Table 1**, average fee totals for residential uses now range from $32,099 for multifamily units to $57,078 for single-family units, and average fee totals for nonresidential uses now range from $6.48 per square foot for industrial projects to $25.27 per square foot for retail projects**.**

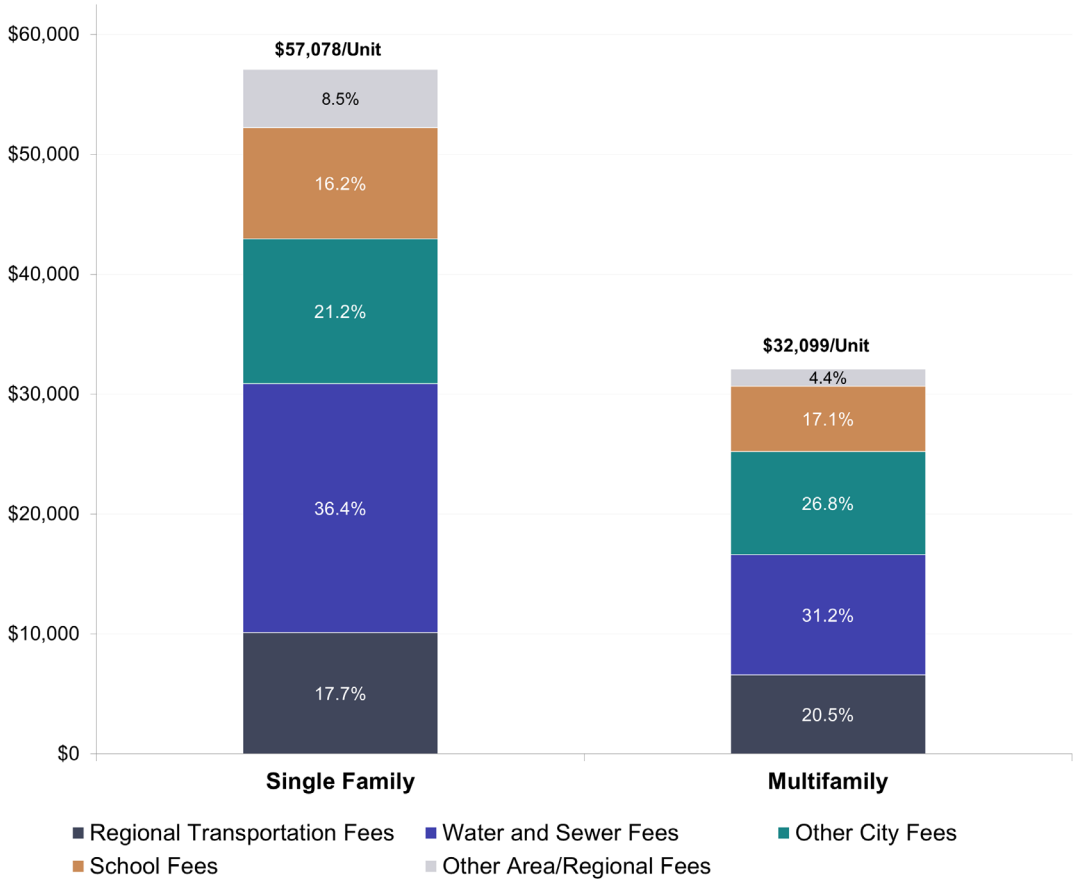
Table 1 Average Total Fee Amounts & Changes since 2018-19 Study by Land Use Type

Land Use	2022-23	2018-19	% Change
Single Family			
Total Fees per Unit	$57,078	$47,470	20.2%
Multifamily			
Total Fees per Unit	$32,099	$29,706	8.1%
Retail			
Total Fees per SF	$25.27	$23.63	6.9%
Office			
Total Fees per SF	$17.04	$14.06	21.2%
Industrial			
Total Fees per SF	$6.48	$5.20	24.5%

FINDING #2: TUMF represents a modest proportion of total residential development impact fees in Western Riverside County and a more variable proportion of nonresidential development impact fees.

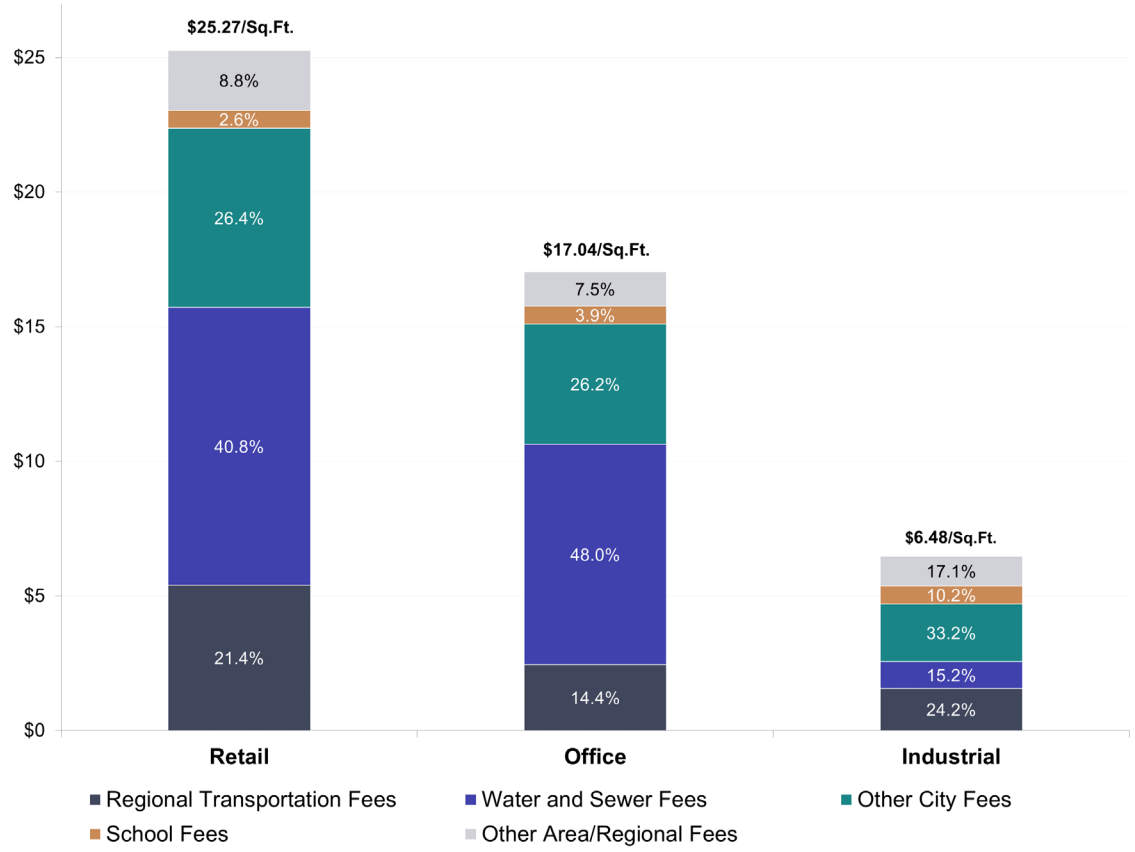
- **For residential developments, TUMF represents close to 20 percent of total development impact fees for both single-family and multifamily development**. Other fee categories are shown in **Figure 1** below. Water and Sewer Fees together represent the greatest proportion of residential development impact fees. The smallest proportion is associated with Other Area/Regional Fees.

Figure 1 Average WRCOG Residential Development Impact Fees by Fee Category



- **Regional Transportation Fees (TUMF) as a proportion of total development impact fees show more variation for nonresidential land uses**. Retail and office fees are dominated by Water and Sewer Fees. For industrial developments, Water and Sewer Fees are substantially lower and Other City Fees are the greatest proportion of total fees (**Figure 2**).

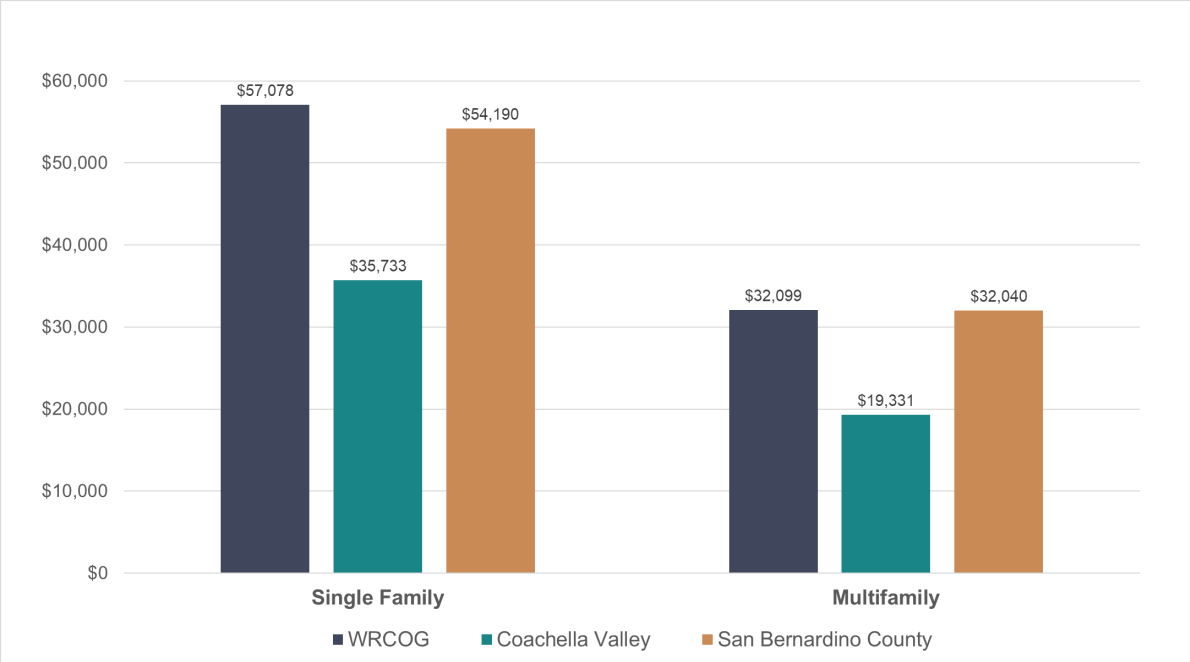
Figure 2 Average WRCOG Nonresidential Development Impact Fees



FINDING #3: Average development impact fees in WRCOG member jurisdictions are generally similar to those in San Bernardino County, though higher than those in Coachella Valley.

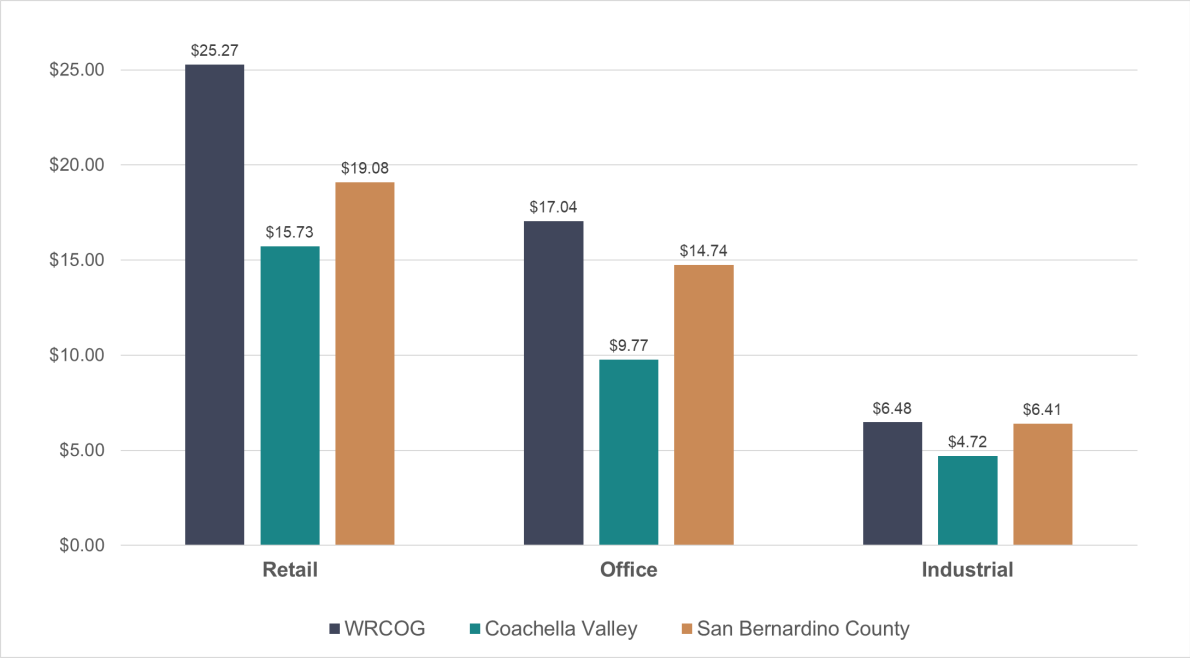
- **Average residential development impact fees for WRCOG jurisdictions are equal to or somewhat higher than the average of selected San Bernardino County cities and the average of selected Coachella Valley cities.** As seen in **Figure 3** below, when compared with the average of selected San Bernardino County cities (Fontana, Yucaipa, San Bernardino, Ontario, Chino, and Rialto) and Coachella Valley cities (Indio, Palm Desert, and Palm Springs), the WRCOG average is slightly higher than the San Bernadino County fees for single-family development and the same for multifamily development. Coachella Valley has substantially lower fees on both single-family and multifamily development.

Figure 3 Average Residential Development Impact Fees in Neighboring Jurisdictions



- **Average nonresidential development impact fees for WRCOG jurisdictions are either higher than or similar to the average of selected San Bernardino County cities for the different land use categories. The average of selected Coachella Valley cities is lower for all land use categories.** As seen in **Figure 4** below, comparing average nonresidential development impact fees in WRCOG to selected San Bernardino County cities shows that, on average, WRCOG fees are substantially higher for retail, somewhat higher for office development, and the same for industrial development. The selected Coachella Valley cities have the lowest average fees in all these nonresidential land uses.

Figure 4 Average Nonresidential Development Impact Fees in Neighboring Jurisdictions



FINDING #4: Average development impact fees among WRCOG member jurisdictions represent between 3.9 percent and 8.9 percent of total development costs/returns, with TUMF as a lower fraction of these proportions.

- **Total development impact fees represent between 3.9 percent and 8.9 percent of total development costs/returns for the prototype feasible projects.** As shown in **Table 2** below, development impact fees represent 8.9 percent of total development costs/returns for the prototype single-family and 7.9 percent of total costs/returns for multifamily developments. As is common, nonresidential development impact fees are lower as a percent of total development cost/return at 3.9 percent for industrial development and 4.7 percent for office development. For retail development, the fee level is 6.8 percent of total costs/returns, between that of residential uses and other nonresidential uses.

- **TUMF represents between 0.7 percent and 1.6 percent of total development costs/returns for the prototype feasible projects**. **While changes in the TUMF can add or subtract from total development costs, it would take a substantial change to increase/decrease overall development costs/returns by more than 1 percent.** As a proportion of overall development costs, TUMF represents 1.6 percent for both single-family and multifamily. For nonresidential uses, TUMF represents 0.7 percent of total development costs for office development, 1.0 percent for industrial development, and 1.4 percent for retail development. TUMF represents between 14.4 percent and 21.4 percent of total development impact fees with the highest ratios for retail and industrial development and lowest for office development, as seen previously in **Figure 2**.

Table 2 Development Impact Fees as % of Total Developments Cost/Returns*

Development Impact Fees	Single Family	Multifamily	Industrial	Retail	Office
TUMF	1.6%	1.6%	1.0%	1.4%	0.7%
Other Development Impact Fees	7.4%	6.2%	3.0%	5.3%	4.0%
Total Development Fees	**8.9%**	**7.9%**	**3.9%**	**6.8%**	**4.7%**

*Totals may not sum due to rounding.

Organization of Report

After this initial chapter, this report is divided into three other chapters and several appendices. **Chapter 2** describes the definitions, methodology, and results of the fee review and comparison for WRCOG and non-WRCOG jurisdictions. **Chapter 3** describes the TUMF and other development impact fees as components of overall estimated development costs and returns for each development prototypes evaluated. Finally, **Chapter 4** provides a brief conclusion on the purposes and goals of this and other development impact fee comparison studies.

The appendices provide a substantial amount of additional supporting detail and information, including:

- **APPENDIX A** provides detailed information on the Development Prototypes.
- **APPENDIX B** provides information on assumptions around location and corresponding service provider (e.g., water district, school district) assignments within each jurisdiction.
- **APPENDIX C** provides fee comparison summaries and detailed fee estimation information for each WRCOG jurisdiction/area and each land use category.

2. Development Impact Fee Review and Comparison

To accomplish the study purpose outlined in **Chapter 1**, development impact fees were estimated for each WRCOG jurisdictions as well as for selected neighboring jurisdictions in Coachella Valley and San Bernardino County. This required detailed research into fee schedules and calculation methodologies for each of these jurisdictions and associated service providers.

All the development impact fee estimates shown are based on fee schedules and information available at the time the research was conducted, primarily during the summer of 2022. EPS attempted to use the most current and up-to-date fee information to enhance comparability and create a representation of fee levels at a single moment in time. However, limited online availability of complete fee information in some jurisdictions and annual fee program update schedules (typically in July) in several jurisdictions added an additional challenge in pinpointing fees at a given moment in time. While every effort was made to ensure that fees are updated and comparable, the final estimates should be considered as planning-level approximations. The actual fees due for a particular project will depend on the specifications of the individual project and the fee schedule at the time of project application.

The first section below provides some key definitions. The subsequent section provides a detailed description of the fee research methodology. The final section provides findings concerning development impacts fees in WRCOG member jurisdictions and other jurisdictions studied. In general, the definitions and approach in this study are consistent with those in the 2018-19 Study to maintain consistency. In some situations, as noted below, refinements were necessary; for example, some water districts provided new information on the water meter assumptions to be used in fee calculations.

Study Definition

Development impact fees have become an increasingly used mechanism among California jurisdictions to require new development to fund the demands it places on local and regional infrastructure and capital facilities. As already noted, this report defines development impact fees as one-time fees collected for the purposes of funding infrastructure and capital facilities. This includes fees for the funding of a broad range of capital improvements, including water, sewer, storm drain, transportation, parks and recreation, public safety, and numerous other types of civic/community facilities. The majority of these fees are adopted under or consistent with the Mitigation Fee Act, though the analysis also includes other one-time capital facilities fees, such as parkland in-lieu fees under the Quimby Act and one-time charges through Community Facilities Districts or Benefit Assessment Districts among others.

This report does not include estimates of other types of fees charged by cities including permitting, planning, and processing fees that are charged on new development, and that do not fund capital facilities/infrastructure. These fees are typically associated with some sort of review

or administrative service provided by a jurisdiction and are typically more modest charges relative to development impact fees (most studies find them to be in the 5 to 15 percent range of development impact fees, between 1 and 2 percent of total development costs).

Some typical fee types that fall in this category of permitting, planning, and processing fees and that are standard across most development projects include:

- ***Building Permit Fee*** – This fee is charged in a various of ways. Jurisdictions charge based on development size, development valuation, or flat fee.
- ***Plan Check Fee*** – This fee is charged in a various of ways. Jurisdictions charge based on development size, development valuation, flat fee, percentage of the Building Permit Fee, or an hourly charge.
- ***California Building Standards Commission Fee*** – This fee is calculated by charging $1 per $25,000 of a development's valuation multiplied by the development's area.
- ***Strong Motion Instrumentation Program Fee*** – This fee is calculated by charging $13 per $100,000 of a development's valuation multiplied by the development's area.
- ***Technology Surcharge*** – This fee is charged differently by jurisdiction. Some jurisdictions charge based on the development's valuation and area, while other some jurisdictions choose to charge this as a percentage of the Building Permit Fee.

Many other fee types exist that are project-dependent and may be related to: various inspections, tentative tract/parcel maps, conditional use permits, plan amendments, annexations, and a wide variety of minor permits. These are typically charged through some combination of flat fee, deposit, and/or actual hourly costs incurred by planning or building department staffs.

Methodology

In order to provide a fee comparison that was as close as possible to an "apples-to-apples" comparison, WRCGOG staff and EPS identified the following parameters to guide the study:

- Jurisdictions to be studied.
- Land uses to be evaluated and associated development prototypes.
- Selection of service providers where there are multiple service providers in same jurisdiction.
- Categorization of the various types of development impact fees

This section describes these study parameters as well as the process of review with the jurisdictions/relevant service providers.

Selection of Jurisdictions for Prototype Analysis

Jurisdictions selected for this analysis include all eighteen (18) WRCOG member cities. WRCOG staff and the EPS also identified three additional unincorporated areas to study, the March JPA, Temescal Valley, and Winchester, all locations where substantial growth is occurring and/or planned within the WRCOG region.

A separate prototype was tested for each city within the WRCOG, as well as three unincorporated areas. Wherever possible, this analysis sought to use the same jurisdictional assumptions as in the 2018-19 Study. Where cities or unincorporated areas are served by multiple school districts, utility districts, and other subdistricts or assessment zones, assumptions were made around subarea locations, as discussed later in this Chapter.

Table 3 shows the cities/communities evaluated, including the twenty-one (21) WRCOG cities/communities and the nine (9) non-WRCOG comparison communities.

Table 3 Jurisdictions Included in Fee Study

WRCOG Jurisdiction		Coachella Valley	San Bernardino County
Banning	Murrieta	Indio	Fontana
Beaumont	Norco	Palm Desert	Yucaipa
Calimesa	Perris	Palm Springs	San Bernardino
Canyon Lake	Riverside		Ontario
Corona	San Jacinto		Chino
Eastvale	Temecula		Rialto
Hemet	Wildomar		
Jurupa Valley	Temescal Valley		
Lake Elsinore	Winchester		
Menifee	March JPA		
Moreno Valley			

Land Uses and Development Prototypes

Land Uses

Development impact fees are levied on a variety of residential and nonresidential land uses with variations for different uses and certain product types often built into the fee programs.

For the purposes of this study, five (5) common land use types that reflect typical development projects and are consistent with prior studies were selected: single-family residential, multifamily residential, retail, office, and "high-cube" industrial[2]

Development Prototype Selections

Within each of the five (5) general land use types selected, this study identifies a detailed development prototype meant to represent a typical development that may likely occur anywhere within the WRCOG region. Based on the characteristics of the protype, the development impact fees can be calculated for each jurisdiction based on applicable fee levels.

[2] "High Cube" is defined as warehouses/distribution centers with a minimum gross floor area of 200,000 sq. ft., minimum ceiling height of 24 feet, and minimum dock-high door loading ratio of 1 door per 10,000 sq. ft.

Choosing a representative prototype that is the same across all jurisdictions ensures that the fee comparison will be "apples-to-apples".

As a starting point, this study utilized the development prototypes used in the 2018-19 Study for each of the five land uses. EPS then reviewed recent data on new single-family, multifamily, office, retail, and industrial developments throughout WRCOG jurisdictions to confirm whether the prototypes still match common characteristics.

Information on multifamily, retail, office, and industrial developments built between 2017 and 2022 was reviewed as was information on single-family developments between 2019 and 2022. Single-family developments were reviewed over a shorter timeframe based on the much larger size of the dataset available (the number of homes built has been much greater relative to the number of other projects). From this data, EPS identified the median building/home size in square feet (and lot size for single-family developments) for each of the land use types and compared these against the prior prototypes.

Based on this analysis, EPS confirmed that all prototypes were still representative of typical projects in the WRCOG region and could be used in this study update. That said, the number of very large industrial projects has increased in recent years, along with the median project size. WRCOG Staff and EPS considered doubling the size of the industrial prototype to reflect this trend and focus specifically on high-cube development, however, it was ultimately decided that utilizing the same prototype as prior studies would be more valuable in providing a better comparison to fee levels in the 2018-19 Study. Furthermore, it was determined that the selected industrial prototype still reflects a common, high-cube industrial development, and the per square foot fee estimates can still be viewed as representative of typical development impact fees for industrial projects.

These prototypes used were also vetted and reviewed in 2018 by the WRCOG Planning Directors' Committee, Public Works Committee, and Technical Advisory Committee. The prototypes are summarized below along with images that represent examples projects with matching characteristics.

Single-Family Residential Development
50-unit residential subdivision; 2,700 square foot homes and 7,200 square foot lots

Example Prototype Single-Family Home, City of Riverside

Multifamily Residential Development
200-unit market-rate, 260,000 gross square foot apartment building

Example Prototype Multi-Family Development, City of Temecula

Retail Development
10,000-gross square foot retail building

Example Prototype Retail Development, City of Hemet

Office Development
20,000-gross square foot, Class A or Class B office building

Example Prototype Office Development, City of Hemet

Industrial Development
265,000 gross square foot "high cube" industrial building[3]

Example Prototype Industrial Development, City of Perris

In addition to building size, several other development characteristics can affect development impact fees. For example, many water facilities fees are tied to the number and size of meters

[3] "High cube" is defined as warehouses/distribution centers with a minimum gross floor area of 200,000 sq. ft., minimum ceiling height of 24 feet, and minimum dock-high door loading ratio of 1 door per 10,000 sq. ft.

associated with a new development. Other fees are tied to the gross site or lot area. EPS utilized a set of additional development prototypes assumptions detailed in **Appendix A**.

In general, and wherever possible, these assumptions were kept consistent with those used in the 2018-19 Study to improve comparability. The 2018-19 assumptions were developed based on a review of equivalent assumptions used in other regional fee studies (e.g., in the San Joaquin Valley and the Sacramento Valley) and refined through feedback from Western Riverside County service providers. In a few cases, fee calculation formulas required even more assumptions, such as estimates of water/sewage flow rates, which were specific to and provided by each service provider.

Where assumptions differed from 2018-19, changes primarily occurred where service providers provided updated information on their typical water meter assumptions or otherwise recommended changes. In certain cases, small deviations from listed prototype assumptions were used. For example, Jurupa Community Services District (JCSD) indicated that they typically permit new single-family homes with ¾" water pipes, which is slightly smaller than the prototype assumption of a 1" pipe, but ¾" is more representative of typical/comparable development fees (JCSD charges much higher fees for the larger 1" pipes, so developers rarely use them) and was used in the estimate.

Subarea Location Assumptions

In some cities, there are multiple service providers providing the same type of facilities in different parts of the city. For example, some cities are served by two or more distinct school districts, and many cities are served by two or more water and/or sewer districts. Therefore, an assumption around location within a subarea or zone associated with a given service provider had to be made in order to calculate each fee estimate. Where possible, these assumptions were kept consistent with those used in the 2018-19 Study, and which were developed based on the following factors:

- Suggestions from the City.
- Commonality of service provider between multiple cities; for example, Eastern Municipal Water District serves many cities.
- Scale/nature of service areas was also considered; for example, in some cases the majority of a City was served by one service provider and/or the majority of the growth areas were served by a particular service provider.
- In some cases, there was one service provider – e.g., the City – with different fees by City subarea (e.g., storm drain). In these cases, an effort was made to select the area expected to see the most growth based on discussions with City and WRCOG staff.
- In other cases, area-specific one-time fees/assessments/special taxes were in place to cover the costs of capital facilities in a new growth area. Where substantial in scale, these areas and the associated area fees were used in the fee comparison.

The location and corresponding service provider assignment assumptions are shown in **Appendix B**.

Fee Types and Categories

The primary focus of the fee research is to develop estimates of existing development impact fees charged on new development in the selected jurisdictions. While some fees are highly uniform, such as school district fees, there is substantial variation in the naming and types of facilities included in other development impact fees. The fee review sought to organize the full set of fees in a normalized set of categories to allow for best comparison. The key fee categories are as follows, which are consistent with the 2018-19 Study:

- **Regional Transportation Fees**. This category includes the respective TUMFs in Western Riverside County and Coachella Valley. TUMF in Western Riverside County is charged by WRCOG directly on the following bases:
    - **Single-Family Residential Development** - Per unit basis.
    - **Multifamily Residential Development** - Per unit basis.
    - **Retail Development** - Per gross building square foot basis. There is no fee on the first 3,000 square feet of an retail development.
    - **Industrial Development** - Per gross building square foot basis. The industrial fee includes a base fee on square footage up to 200,000 square feet and then, where the building meets the definition of a "high cube" building[4], an effective discount of 73 percent in the base fee for all additional development above 200,000 square feet.
    - **Office Development** – Per gross building square foot basis.

  This category also includes regional transportation impact fees in other subregions/jurisdictions where they are clearly called out. In San Bernardino County, cities are similarly required to contribute towards regional transportation funding, but not all of them distinguish between local and regional fees, in which case all transportation fees fall under the "Other City Fees" category.

- **Water and Sewer Fees**. All development locations studied were subject to some form of water and sewer development impact fees, whether a connection or capacity related charge, and these are combined into one category. These are typically collected either by a city or directly by a service provider

- **Other City Fees**. Beyond water/sewer fees (which are sometimes charged or collected by cities), jurisdictions frequently adopt a large number of additional citywide (or countywide)

[4] "High Cube" is defined as warehouses/distribution centers with a minimum gross floor area of 200,000 sq. ft., minimum ceiling height of 24 feet, and minimum dock-high door loading ratio of 1 door per 10,000 sq. ft.

fees used to fund various capital facilities. This category captures a wide variety of fees including: local transportation fees, parks and recreation facilities fees, Quimby Act in-lieu parkland fees, storm drain fees, public safety facilities fees, other civic/community facilities fees, and, on occasion, affordable housing, or public art in-lieu fees.

- **School Fees**. School facilities fees are governed by State law and therefore show more similarity between jurisdictions than most fees. Under State law, School Districts can charge specified Level 1 development impact fees. If School Districts go through the process of identifying and estimating required capital improvement costs, higher Level 2 fees can be charged to fund up to 50 percent of the School District's capital improvement costs. Only five school districts serving WRCOG jurisdictions charged Level 2 fees at the time of this study.
- **Other Area/Regional Fees**. A final category was developed to capture other fees not included in the above categories, typically other sub-regional fees or area-specific fees. For example, this category includes the Western Riverside County Multiple Species Habitat Conservation Plan mitigation fee, various Road and Bridge Benefit Districts (RBBD) fees, as well as other one-time community facilities district charges/fees for infrastructure/capital facilities applied in particular growth areas.

Fee Estimation and Review Process

For WRCOG member jurisdictions, EPS worked with WRCOG staff to complete the following data collection and review process to come up with each fee estimate:

- Confirm base assumptions including development prototype characteristics and set of service providers
- Use online sources to obtain development impact fee schedules from each jurisdiction or service provider.
- Identify and list development impact fees charged in jurisdiction and/or for each service provider.
- Where fee schedule provided insufficient information, review available mitigation fee nexus studies, ordinances, or resolutions, as applicable.
- Where sufficient data was not available or incomplete, contact City, County, or other service provider to obtain/confirm appropriate fee schedules.
- Develop initial estimates of each development impact fee for each development prototype.
- Review estimates in comparison with 2018 fee amounts to identify unusual or unexpected discrepancies or large changes in fee levels.
- Compile summary charts showing initial fee estimates and share with representatives of each jurisdiction and/or relevant service providers (e.g., Eastern Municipal Water District).
- Receive feedback, corrections, and refinements (and in some cases actual fee calculations).
- Refine fee estimates based on feedback and confirm changes with jurisdictions.

For non-WRCOG jurisdictions, the process followed was largely the same, except that fee estimate information was not reviewed by jurisdiction representatives.

Findings from WRCOG Member Jurisdiction Fee Review

General findings from fee research for the WRCOG region are summarized below.

On average, WRCOG TUMF residential fees represent close to 20 percent of total development impact fees for both single-family and multifamily development. Regional Transportation Fees (or TUMF) for both single-family TUMF and multifamily TUMF represent around 20 percent of the respective average total development impact fees, with the percentage for single-family development being slightly lower at 17.7% compared with 20.5% for multifamily development. However, within individual jurisdictions, fee totals vary widely – from $41,338 per unit to $82,711 per unit for single-family development and from $19,267 per unit to $47,196 per unit for multifamily development – and TUMF, which is the same across jurisdictions, therefore varies as a percent of total fees from 12.2 percent to 24.4 percent for single-family development and 13.9 percent to 34.2 percent for multifamily development (see **Table 4**, and **Figure 5**). Nominal average fee totals by fee category are shown in **Table 5.**

Table 4 TUMF as a Proportion of Total Fees

Item	Average	Range	
		Low	High
Single Family			
Total Fees per Unit	$57,078	$41,338	$82,711
TUMF as a % of Total Fees	17.7%	24.4%	12.2%
Multifamily			
Total Fees per Unit	$32,099	$19,267	$47,196
TUMF as a % of Total Fees	20.5%	34.2%	13.9%
Industrial			
Total Fees per SF	$6.48	$4.02	$10.98
TUMF as a % of Total Fees	24.2%	39.0%	14.3%
Retail			
Total Fees per SF	$25.27	$14.21	$39.61
TUMF as a % of Total Fees	21.4%	38.0%	13.6%
Office			
Total Fees per SF	$17.04	$8.30	$25.11
TUMF as a % of Total Fees	14.4%	29.5%	9.8%

* Average and ranges as shown encompass 21 jurisdiction, including 18 cities and the incorporated areas of Temescal Valley, Winchester, and March JPA.

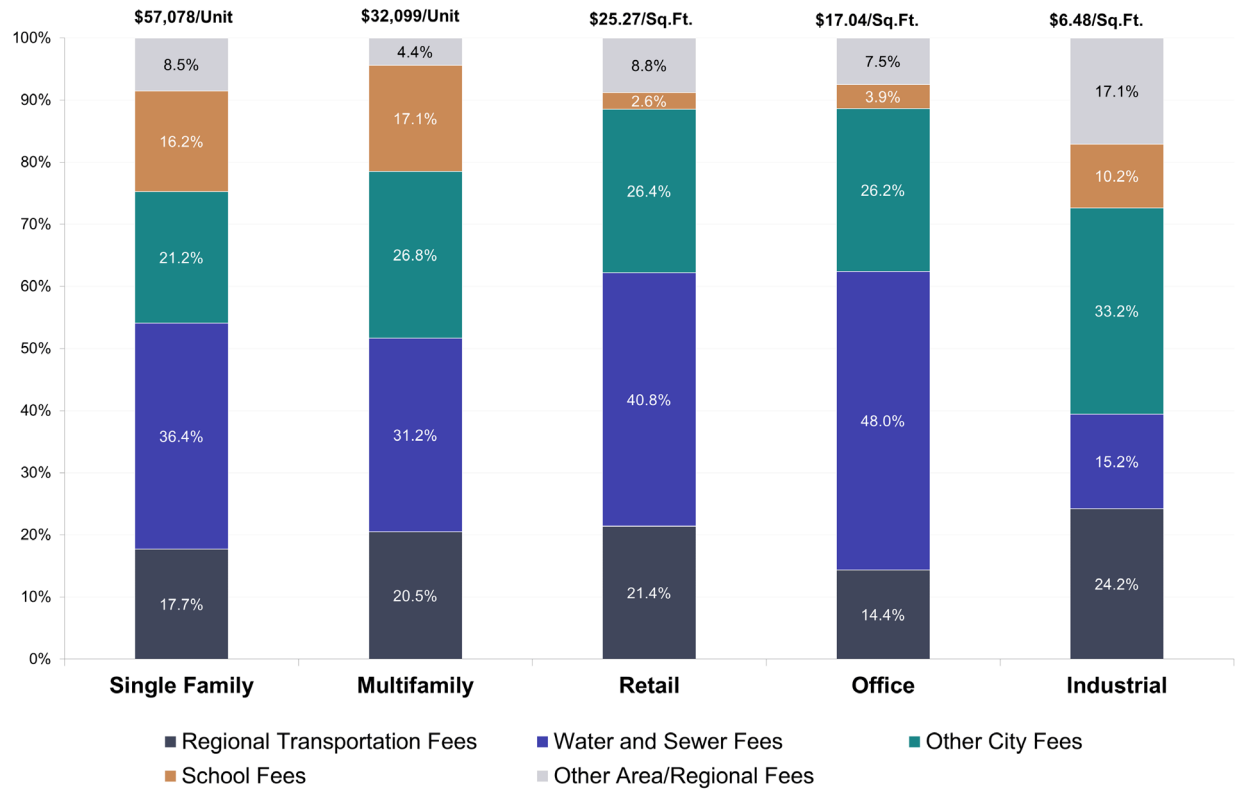
On average, WRCOG nonresidential TUMF shows more variation in level and in proportion of overall development impact fees (between 10 percent and 39 percent) than for the residential fee categories. Average total retail fees are about $25 per square foot, of which Regional Transportation Fees represent 21 percent. Due to the variation in the total fees on retail development among jurisdictions (from $14.21 to $39.26 per square foot), TUMF as a percent of total fees ranges from 13.6 percent to 38 percent. Average total industrial fees are substantially lower at $6.48 per square foot with a range from $4.08 per square foot to $10.98 per square foot. TUMF represents about 24 percent of the average total industrial fees, with a range from 14.3 percent to 39 percent. Total fees on office development fall in between the retail and industrial fees at an average of $17.04 per square foot and a range from $8.30 to $25.11 per square foot. The TUMF fee represents a relatively low 14.4 percent of average overall fees on office development with a range from 9.8 percent to 29.5 percent (see **Table 4**, **Table 5**, and **Figure 5**).

Nonresidential development impact fees show more variation in terms of the distribution between fee categories. Retail fees are dominated by water and sewer fees (40.8 percent) as well as Regional Transportation Fees (21.4 percent). Fees for industrial buildings, which are typically less intensive water users, are lower overall and more dominated on a proportionate basis by Other City fees (33.2 percent) and Regional Transportation Fees (24.2 percent). Office fees reflect a different pattern with substantial Water and Sewer Fees at 48 percent followed by Other City fees at 26.2 percent (see **Table 5** and **Figure 5**).

Table 5 Average Development Impact Fee Costs by Category in WRCOG Region

Fee	Single Family (per Unit)	Multifamily (per Unit)	Industrial (per Sq.Ft)	Retail (per Sq.Ft)	Office (per Sq.Ft)
Regional Transportation Fees	$10,104	$6,580	$1.57	$5.40	$2.45
Water and Sewer Fees	$20,772	$10,012	$0.99	$10.31	$8.19
Other City Fees	$12,075	$8,608	$2.15	$6.66	$4.47
School Fees	$9,275	$5,480	$0.66	$0.66	$0.66
Other Area/Regional Fees	$4,853	$1,418	$1.11	$2.23	$1.27
Total Fees	**$57,078**	**$32,099**	**$6.48**	**$25.27**	**$17.04**

Figure 5 Average Development Impact Fee Costs in WRCOG Jurisdictions



Unincorporated jurisdictions have slightly lower total fees as compared to the average for all WRCOG study jurisdictions. For single-family and multifamily residential uses, total fees for the unincorporated study areas were 85 percent and 95 percent, respectively, of the WRCOG average total fee amount for residential uses, as shown in **Table 6**. For nonresidential uses, total fees for unincorporated study areas were between 67 and 73 percent of the WRCOG average for nonresidential uses. Across land use types, this difference can be primarily attributed to fewer fees in the Other City Fees category.

Table 6 Unincorporated Jurisdictions/March JPA and Total Jurisdictions Comparisons

Item	Single Family (per Unit)	Multifamily (per Unit)	Industrial (per Sq.Ft)	Retail (per Sq.Ft)	Office (per Sq.Ft)
Unincorporated Jurisdictions and March JPA	$48,672	$30,341	$4.37	$17.61	$12.49
Total Jurisdictions	$57,078	$32,099	$6.48	$25.27	$17.04
Unincorporated Jurisdictions and March JPA / Total Jurisdiction	85%	95%	67%	70%	73%

Fee Level Changes since 2018-19 Study

Table 7 through **Table 11** provide additional detail on the changes in fee levels by fee category.

Table 7 Single Family 2018-2022 Fee Comparison

	Average Fee Per Dwelling Unit			
Single Family	**2018**	**2022**	**$ Change**	**% Change**
Regional Transportation Fees	$8,873	$10,104	$1,231.00	13.9%
Water and Sewer Fees	$17,070	$20,772	$3,702	21.7%
Other City Fees	$10,055	$12,075	$2,020	20.1%
School Fees	$8,785	$9,275	$489	5.6%
Other Area/Regional Fees	$2,686	$4,853	$2,167	80.7%
Total Fees	$47,470	$57,078	$9,609	20.2%

Table 8 Multifamily 2018-2022 Fee Comparison

	Average Fee Per Dwelling Unit			
Multifamily	**2018**	**2022**	**$ Change**	**% Change**
Regional Transportation Fees	$6,134	$6,580	$446	7.3%
Water and Sewer Fees	$9,636	$10,012	$376	3.9%
Other City Fees	$7,231	$8,608	$1,377	19.0%
School Fees	$5,191	$5,480	$289	5.6%
Other Area/Regional Fees	$1,512	$1,418	-$94	-6.2%
Total Fees	$29,706	$32,099	$2,393	8.1%

Table 9 Retail 2018-2022 Fee Comparison

	Average Fee Per Square Foot			
Retail	**2018**	**2022**	**$ Change**	**% Change**
Regional Transportation Fees	$7.50	$5.40	-$2.10	-27.9%
Water and Sewer Fees	$9.84	$10.31	$0.47	4.8%
Other City Fees	$4.75	$6.66	$1.91	40.3%
School Fees	$0.59	$0.66	$0.07	11.7%
Other Area/Regional Fees	$0.95	$2.23	$1.28	135.7%
Total Fees	$23.63	$25.27	$1.64	6.9%

Table 10 Office 2018-2022 Fee Comparison

	Average Fee Per Square Foot			
Office	**2018**	**2022**	**$ Change**	**% Change**
Regional Transportation Fees	$2.19	$2.45	$0.26	11.9%
Water and Sewer Fees	$7.34	$8.19	$0.84	11.5%
Other City Fees	$3.39	$4.47	$1.07	31.6%
School Fees	$0.59	$0.66	$0.07	11.7%
Other Area/Regional Fees	$0.54	$1.27	$0.73	135.8%
Total Fees	$14.06	$17.04	$2.98	21.2%

Table 11 Industrial 2018-2022 Fee Comparison

Industrial	Average Fee Per Square Foot			
	2018	2022	$ Change	% Change
Regional Transportation Fees	$1.45	$1.57	$0.11	7.9%
Water and Sewer Fees	$1.04	$0.99	-$0.05	-4.7%
Other City Fees	$1.65	$2.15	$0.50	30.1%
School Fees	$0.59	$0.66	$0.07	11.7%
Other Area/Regional Fees	$0.47	$1.11	$0.64	137.1%
Total Fees	$5.20	$6.48	$1.27	24.5%

Findings from Fee Comparison with Non-WRCOG Jurisdictions

Figure 6 through **Figure 9** compare the average overall WRCOG development impact fees (and their proportionate distributions between the five major fee categories) with other cities/groups of cities for all five land uses/development prototypes studied. The comparative cities/subregions include selected jurisdictions in the Coachella Valley and San Bernardino County.

Average development impact fees for WRCOG jurisdictions are equal to or somewhat higher than the average of selected San Bernardino County cities. When compared with the average of selected San Bernardino County cities (Fontana, Yucaipa, San Bernardino, Ontario, Chino, and Rialto), the WRCOG average is higher for all land uses, and roughly equivalent for multifamily and industrial. New development in San Bernardino County cities is required to make payments towards regional transportation infrastructure, though the distinction between the regional and local transportation fees is often unclear. Overall, the combination of Regional Transportation Fees, Other City fees, and Area/Other Regional fees is lower in San Bernardino County than in Riverside County for all land uses.

The average development impact fees for selected Coachella Valley cities are lower than the WRCOG averages for all land uses. The average for selected Coachella Valley cities (Indio, Palm Desert, and Palm Springs) is substantially lower for single-family, multifamily, office, and retail development, and modestly lower industrial development. In the case of residential uses, this is primarily due to lower Regional Transportation Fees and Other City Fees. For nonresidential uses, this is more generally attributable to lower Water and Sewer Fees and lower Other Area/Regional Fees.

Figure 6 Average Single-Family Development Impact Fee Costs and Proportions in Neighboring Jurisdictions

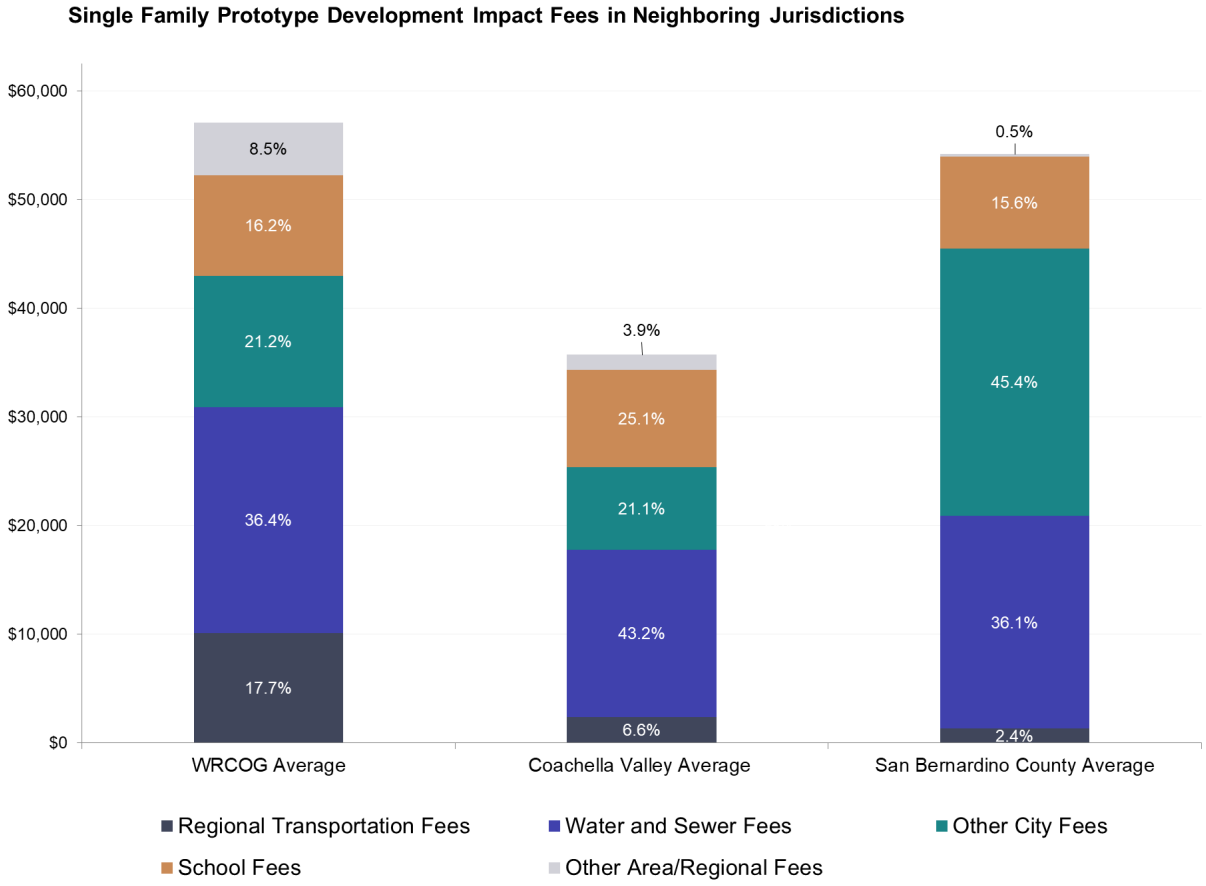


Figure 7 Average Multifamily Development Impact Fee Costs and Proportions in Neighboring Jurisdictions

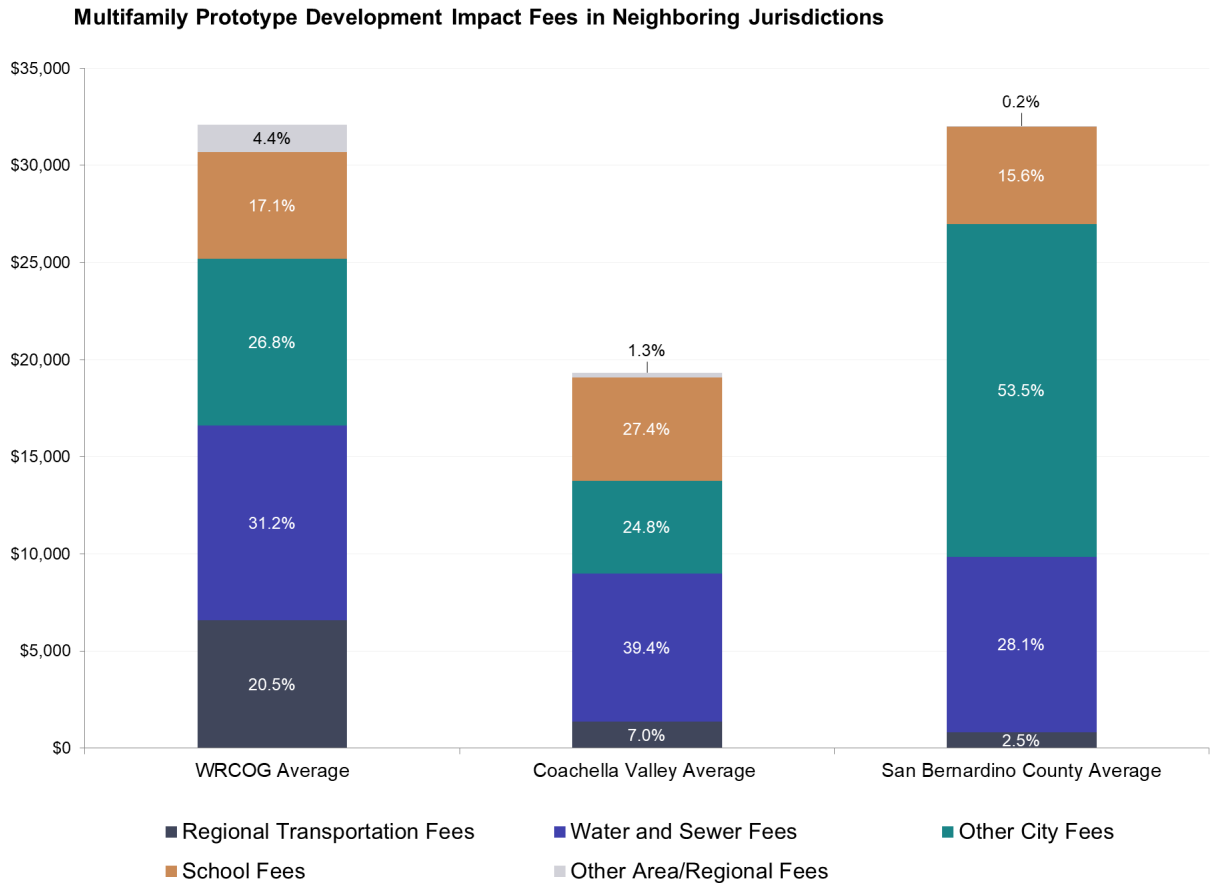


Figure 8 Average Retail Development Impact Fee Costs and Proportions in Neighboring Jurisdictions

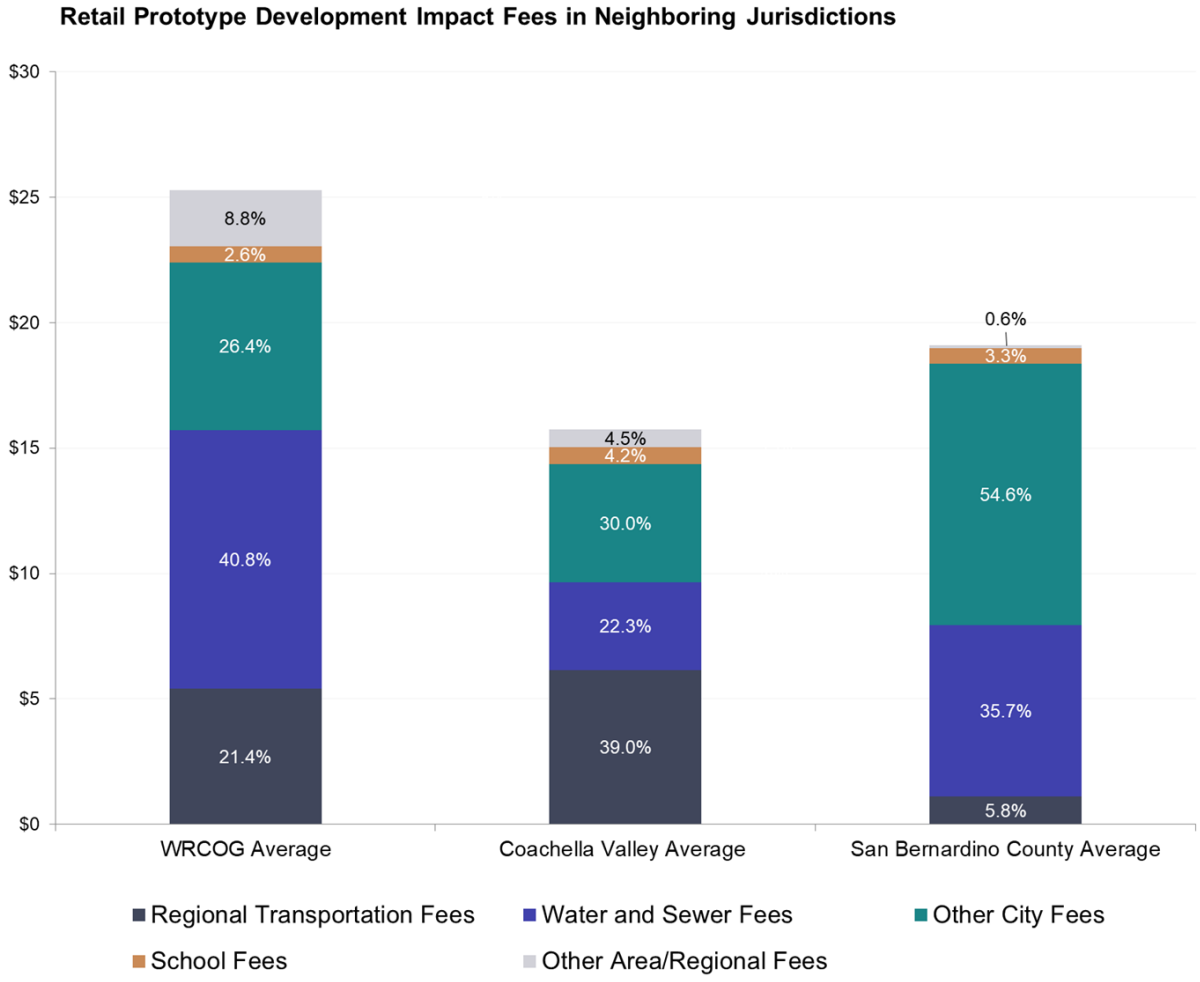


Figure 9 Average Office Development Impact Fee Costs and Proportions in Neighboring Jurisdictions

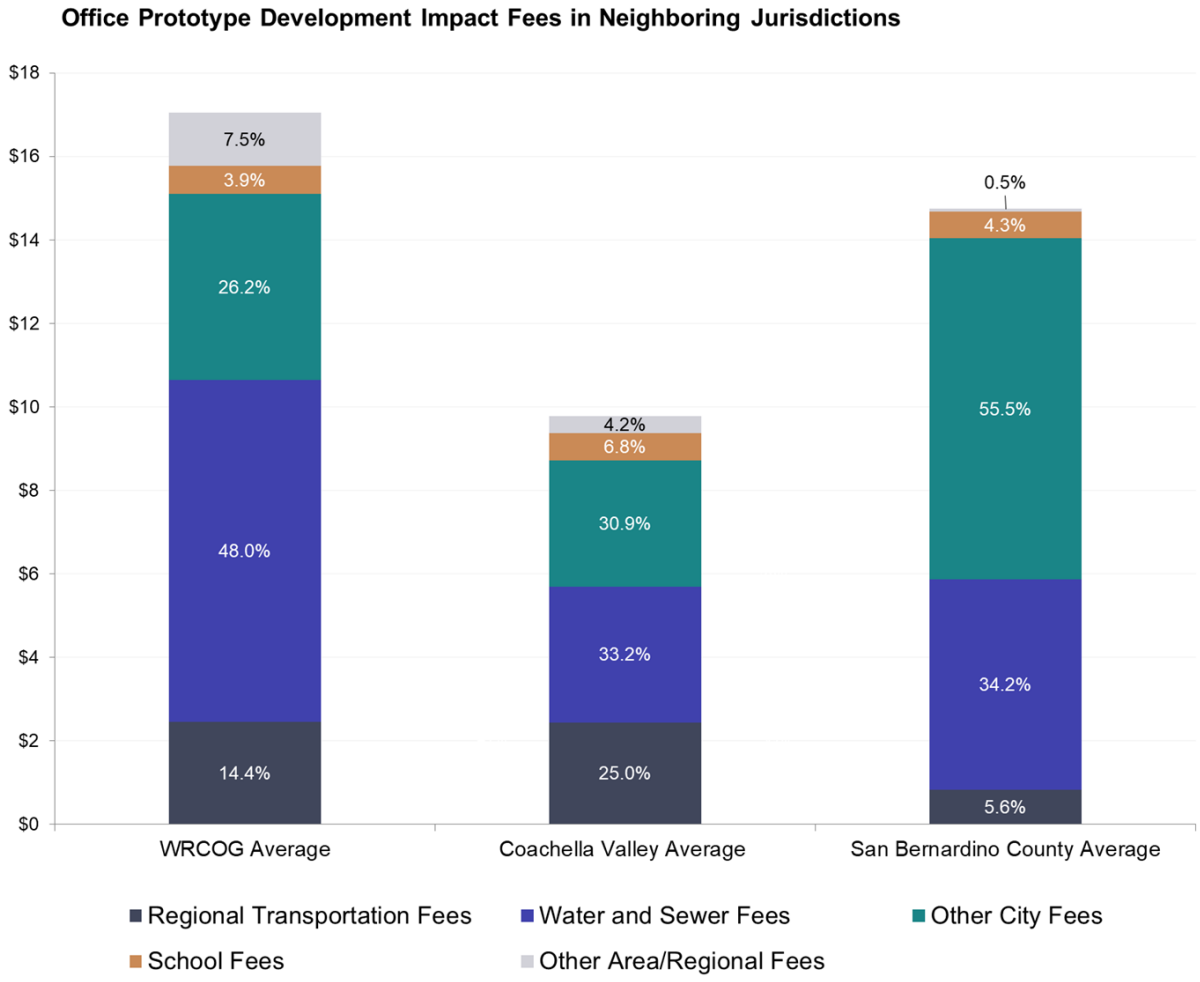
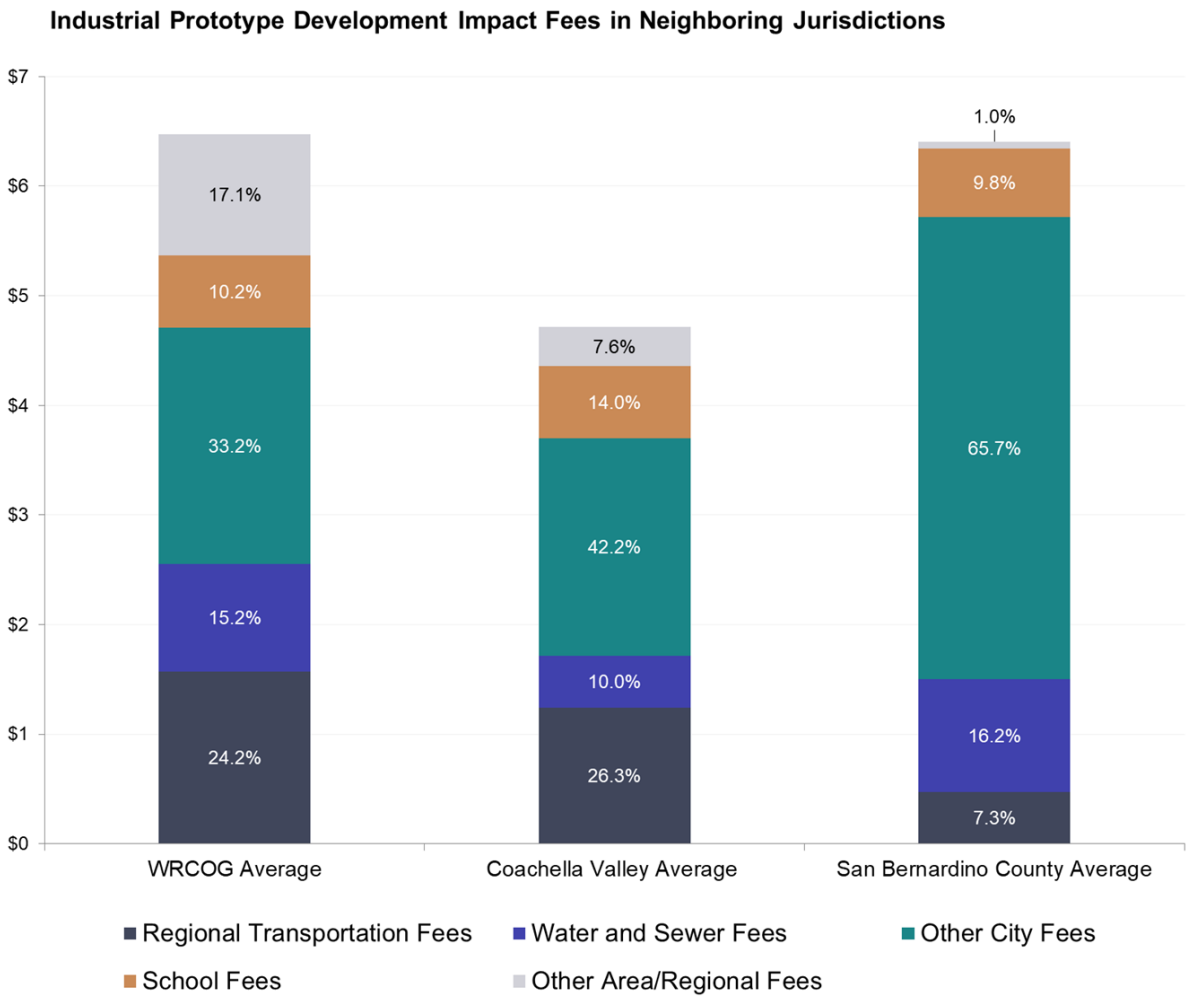


Figure 10 Average Industrial Development Impact Fee Costs and Proportions in Neighboring Jurisdictions



3. Development Impact Fees and Development Costs

This chapter evaluates development impact fees, including the TUMF, in Western Riverside County in the context of overall development costs. The first section below provides an overview of the complex factors that influence decisions to develop, one of which is development cost. The subsequent section describes the methodology used to estimate development costs for different land use types. The next section provides conclusions concerning the level of fees and TUMF in the context of overall costs.

It is critical to note that this analysis uses generalized development prototypes and development cost and return estimates to draw overall conclusions about development impact fees relative to development costs. This analysis does not represent a project-specific analysis as the development program, development costs, and returns associated with any individual project can vary widely. No conclusions concerning the feasibility of any specific project should be drawn from this analysis.

Economics of Development

Key Factors in New Development

The drivers of growth and development are complex and multifaceted, and market conditions influenced by broader global, national, and regional economic conditions are typically the strongest factor. Though regional and local policies (including the choice of whether and how much to charge in impact fees) will not be sufficient to attract or capture development when market conditions are poor, they can influence the feasibility and pace of development during more moderate or strong market conditions. Market strength is typically reflected by the price point or lease rate that users/homeowners/renters are willing to pay.

Developers (whether looking to do speculative development or to provide build-to-suit developments for larger users) will review a number of conditions before determining whether to move forward with site acquisition/optioning and pre-development activities. Factors will include: (1) the availability of appropriate sites, (2) the availability of/proximity to/quality of infrastructure/facilities (e.g., proximity to transportation corridors, schools, and other amenities), (3) local market strength (achievable sales prices/lease rates) in the context of competitive supply, (4) expected development costs (including land acquisition costs, construction materials and labor costs, the availability and costs of financing, and development impact fees, among others), and, (5) where sites are unentitled, the entitlement risk.

When the strength of market demand for new residential and nonresidential development is sufficient, it typically spurs more detailed review and evaluation of sites by developers. Even in cases where market factors look strong, there is a complex balance between development revenues, development costs, land costs, and required developer returns that must be achieved

to catalyze new development. Modest fluctuations in development revenues (i.e., market prices), development costs (materials, labor costs, etc.), and landowner expectations (perceived value of land) can all affect development decisions as can assessments of entitlement risk and complexity, where entitlements are still required.

While many of these factors, such as the price of steel, the complexities of CEQA, the market for labor, and land values, are outside of the control of local public agencies, development impact fees represent one factor that can be adjusted at the local level. That said, given limited sources of revenue for local jurisdictions, there are policy tradeoffs to not charging development impact fees, especially as they can have long-term influence on other factors that influence market demand, including local infrastructure/amenities, transportation connections to job centers, and school district quality.

Methodology

Every development project is different and will have different development costs. For the purposes of this analysis, EPS considered the same set of land use prototypes as for the fee review and comparison and developed an illustrative estimate of the full set of development costs. The steps taken in developing the development cost estimates are described in the subsections below.

Land Uses Evaluated

The development cost evaluation was completed for the same development prototypes as used in the estimation of development impact fees described in **Chapter 2**:

- Residential Single-family Development – Single-family homes in a 50-unit subdivision
- Residential Multifamily Development – Multifamily apartments in a 200-unit building
- Industrial Development – Industrial space in a 265,000 square foot "high cube" building
- Office Development – Office space in a 20,000 square foot office building
- Retail Development – Retail space in a 10,000 square foot retail building

Development Cost Estimates

An illustrative static pro forma structure was developed. The pro forma incorporated different categories of development costs (see below). It also considered potential land values/acquisition costs based on a residual land value approach that considered potential development values, subtracted direct and indirect development costs and developer return requirements, and indicated a potential residual land value. The development values were refined based on available market data ranges and the need to generate a land value of an appropriate level to support land acquisition and new development. Available information on land transactions was also reviewed. As noted above, this analysis is designed to provide overall insights on general economic relationships and does not draw conclusions concerning the feasibility of individual projects.

It is also important to note that the pro formas developed were specifically configured to represent a potentially feasible set of relationships, in terms of revenues, costs, and returns. This allows for consideration of development impact fees in the context of illustrative projects that would make sense to undertake. To the extent, development costs/returns are higher than those indicated – a reality which could certainly be true for many projects – development values would need to be higher or feasibility is not likely to be attained. To the extent, this is true, development impact fees as a proportion of development costs/returns would be lower than those shown.

In this study, major cost categories were revised from the 2018-19 Study, including direct construction costs, land costs, and development impact fees.

- **Direct Construction Costs** – Site Work/Improvements and Vertical Construction Costs. Estimates were taken from Marshal & Swift (a construction cost data provider) estimates, available pro formas, and information from developers where available.
- **Indirect Costs** – Architecture and Engineering Costs, Sales and Marketing, Financing, Development Impact Fee, and other soft costs. Estimates were taken from Marshal & Swift, the WRCOG Fee Comparison, available pro formas, and information from developers where available.
- **Developer Return Requirements** – Developer return requirements were set to be equal to between 9 and 10 percent of development value for all land uses. This represented between 10 and 20 percent of direct and indirect construction costs consistent with typical developer hurdle returns.
- **Land Costs** – Land costs were based on the estimated residual land values when costs and returns were subtracted from estimates of development value and/or information on actual land transactions. Land costs as a percent of development value were reviewed to make sure they fell within a viable range.

Results

As context for the description of the results of this analysis, it is worth repeating that there will be considerable variation throughout Western Riverside County in terms of different development cost components and overall development costs. On an average/illustrative basis, overall development costs included in this analysis may be conservative as they do not include union labor costs and may be conservative with regard to entitlement costs. Given that the focus of this analysis is on the relationship between development impact fees and total development costs, an underestimate in total development costs would mean that the proportionate significance of impact fees has been overestimated.

It is again important to note that the analysis shown here is not an evaluation of development feasibility. Such an analysis would require a more-location specific analysis and is highly dependent on site characteristics, local market conditions, and site land values, among other factors.

Table 12 summarizes the estimated development costs/returns on a per residential unit and per Nonresidential building square foot basis. **Table 13** converts the cost estimates into percent allocations out of the total development/return. It should be noted that the total cost/return (equivalent to the 100 percent) equals the sum of direct and indirect costs, estimated land costs, and required development return. This total cost/return is equivalent to the sales prices/capitalized building value a developer would need to command to cover all costs/return requirements. To the extent, actual costs are higher (e.g., higher land costs or construction costs), the achievable sales prices/capitalized lease rates would also need to be higher.

Table 12 Average Development Cost and Return Estimates by Development Prototype

Development Costs, Land Values, and Return	Single Family (per Unit)	Multifamily (per Unit)	Industrial (per Sq.Ft)	Retail (per Sq.Ft)	Office (per Sq.Ft)
DIRECT					
Basic Site Work/ Lot Improveme	$30,000	$9,257	$11.50	$25.00	$14.29
Direct Construction Cost	$302,400	$220,350	$80.00	$158.00	$203.00
Hard Cost Total	$332,400	$229,607	$91.50	$183.00	$217.29
INDIRECT					
TUMF	$10,104	$6,580	$1.57	$5.40	$2.45
Other Development Impact Fees	$46,974	$25,519	$4.91	$19.87	$14.59
Other Soft Costs	$74,420	$53,791	$18.30	$35.46	$44.34
Soft Cost Total	$131,498	$85,890	$24.78	$60.73	$61.38
Total Direct and Indirect Costs	**$463,898**	**$315,497**	**$116.28**	**$243.73**	**$278.66**
Developer Return Requirement	$63,800	$40,863	$15.00	$34.61	$38.18
Land Value	$110,302	$52,269	$33.80	$95.93	$45.70
TOTAL COST/RETURN	**$638,000**	**$408,629**	**$165.08**	**$374.27**	**$362.54**

* Assumes generally feasible market conditions (i.e. ability to generate developer return and positive land value).

Table 13 Proportional Development Costs and Returns by Development Prototype

Development Costs, Land Values, and Return	Single Family	Multifamily	Industrial	Retail	Office
DIRECT					
Basic Site Work/ Lot Improveme	4.7%	2.3%	7.0%	6.7%	3.9%
Direct Construction Cost	47.4%	53.9%	48.5%	42.2%	56.0%
Hard Cost Total	52.1%	56.2%	55.4%	48.9%	59.9%
INDIRECT					
TUMF	1.6%	1.6%	1.0%	1.4%	0.7%
Other Development Impact Fees	7.4%	6.2%	3.0%	5.3%	4.0%
Other Soft Costs	11.7%	13.2%	11.1%	9.5%	12.2%
Soft Cost Total	20.6%	21.0%	15.0%	16.2%	16.9%
Total Direct and Indirect Costs	**72.7%**	**77.2%**	**70.4%**	**65.1%**	**76.9%**
Developer Return Requirement	10.0%	10.0%	9.1%	9.2%	10.5%
Land Value	17.3%	12.8%	20.5%	25.6%	12.6%
TOTAL COST/RETURN (%)	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

* Assumes generally feasible market conditions (i.e. ability to generate developer return and positive land value).

Key findings include:

- **Direct construction costs represent the largest proportion of total development costs/returns, typically followed by other land costs, other soft costs (collectively), developer returns, and development impact fees.** Unsurprisingly, direct construction costs are the largest cost, representing between 42.2 percent and 56 percent of total costs/returns for the prototypes evaluated. Land costs are likely to be most variable, and depending on circumstance, range from 12.6 percent to 25.6 percent for the prototypes. Other soft costs collectively are the next highest component, though their subcomponents (not shown), such as sales and marketing, architecture and engineering, financing costs, are smaller. The expected hurdle developer return at 9 to 10 percent is the next highest factor. The range for total development impact fees is below all these other ranges, though when indirect costs are considered individually development impact fees are larger than other subcomponents.

- **Total development impact fees represent between 4 percent and 8.9 percent of total development costs/returns for the prototype feasible projects.** Total development impact fees represent 8.9 percent and 7.9 percent of total development costs/returns respectively for single-family and multifamily developments, respectively. As discussed in Chapter 2, these capital facilities fees included water and sewer fees, school district fees, other local jurisdiction fees, TUMF, and other agency/subarea fees. As is common, nonresidential development impact fees are lower as a percent though show a

significant range from 4 percent for industrial development, to 4.7 percent for office development, to 6.8 percent for retail development. Since the 2018-19 Study, the percent of costs that the development impact fees represent has seen a minimal change. The largest change was seen in the proportion of fees on multifamily projects, which decreased by 1 percentage point.

- **TUMF represent between 0.7 percent and 1.6 percent of total development costs/returns for the prototype feasible projects**. As a proportion of overall development costs, TUMF represent 1.6 percent total residential development costs for both single-family and multifamily. For nonresidential uses there is greater variation with TUMF representing 0.7 percent of total costs for office development, 1 percent of total costs for industrial development, and 1.4 percent of total costs for retail development. TUMF represent between 14.4 percent and 24.2 percent of total development impact fees, on average, as indicated in the Fee Comparison with the highest ratios for industrial development and lowest for office development.

4. Conclusions

The Western Riverside Council of Governments (WRCOG) commissioned this and prior studies to provide increased regional understanding of development impact fees on new development in Western Riverside County. It is common practice for new and updated Development Impact Fee Nexus Studies to be accompanied by some consideration of impact fees in neighboring and peer communities and, less frequently, by consideration of impact fees in the context of overall development costs and economics. This is true where individual jurisdictions are introducing/updating a single development impact fee category (e.g. transportation or parks) as well as when undertaking a more comprehensive update to multiple fee categories.

Following the first study in 2016, WRCOG recommended that this report and study be updated periodically to ensure the regional understanding of the region's impact fees remains current in the context of: (1) frequent adjustments to fee levels by individual jurisdictions, (2) changing development cost and economic conditions, and (3) less frequent, but highly significant changes in State law that affect the use and availability of other public financing tools.

The development of this updated study follows that recommendation and represents the second effort to bring the original study up to date.

APPENDIX A:

Development Prototypes

Single Family Prototype

- Reflects median home size for Western Riverside County home sales since 2014

Product Type:	Single Family Detached Unit	
Development Type:	Residential Subdivision	
No. of Acres:	10	Acres
No. of Units:	50	Units
Building Sq.Ft.	2,700	Sq.Ft.
No. of Bedrooms:	4	
No. of Bathrooms:	3	
Garage Space (Sq.Ft):	500	Sq.Ft.
Habitable Space (Sq.Ft:)	2,200	Sq.Ft.
Lot Size:	7,200	Sq.Ft.
Density:	5	DU/AC
Lot Width:	60	Ft.
Lot Depth:	120	Ft.
Total Lot Dimensions (Sq.Ft.):	7,200	Sq.Ft.
Water Meter Size	One 1	Inch Meter

Example Prototype Home, City of Riverside

Multi-Family Prototype

- Reflects median building size for multi-family developments since 2010

Example Prototype Multi-Family Development, City of Temecula

Product Type:	Multi Family Apartment Unit	
Development Type:	Multi Family Apartment Building	
Number of Acres:	10	Acres
Apartment Building Square Feet:	260,000	Sq.Ft.
FAR:	0.60	
Number of Stories:	3	
Dwelling Units:	200	
Density:	20.0	DU/AC
Average Unit Size:	1,100	
Water Meter Sizes*:	Eight 2 inch Meters	
Roof Area:	86,667	Sq.Ft.
Lot Width:	515.0	Ft.
Lot Depth:	846.6	Ft.

*Note: Assumption is for analytical simplicity. Different assumptions are used where recommended by individual jurisdictions.

Industrial Prototype

- Reflects median building size for industrial developments since 2010

Product Type:	Warehouse/ Distribution	
Criteria:	Meets criteria for High-Cube	
No. of Acres:	15.2	Acres
Rentable Square Feet:	265,000	Sq.Ft.
FAR:	0.4	
Water Meter Sizes:	One 2	Inch Meter
Roof Area:	265,000	Sq.Ft.
Lot Width:	813.7	Ft.
Lot Depth:	813.7	Ft.

Example Prototype Industrial Development, City of Perris

Retail Prototype

- Reflects building size for retail developments since 2010

Example Prototype Retail Development, City of Hemet

Product Type:	Retail Building
No. of Acres:	1.15 Acres
Rentable Square Feet:	10,000 Sq.Ft.
FAR:	0.2
No. of Stories:	1
Water Meter Sizes:	One 2 Inch Meter
Roof Area:	10,000 Sq.Ft.
Lot Width:	223.6 Ft.
Lot Depth:	223.6 Ft.

Office Prototype

- Reflects median building size for office developments since 2010

Product Type:	Office Building	
Number of Acres:	1.3	Acres
Rentable Square Feet:	20,000	Sq.Ft.
FAR:	0.35	
No. of Stories:	2	
Water Meter Sizes:	One 2	Inch Meter
Roof Area:	10,000	Sq.Ft.
Lot Width:	239.0	Ft.
Lot Depth:	239.0	Ft.

Example Prototype Office Development, City of Hemet

APPENDIX B:

Location & Service Provider Assumptions

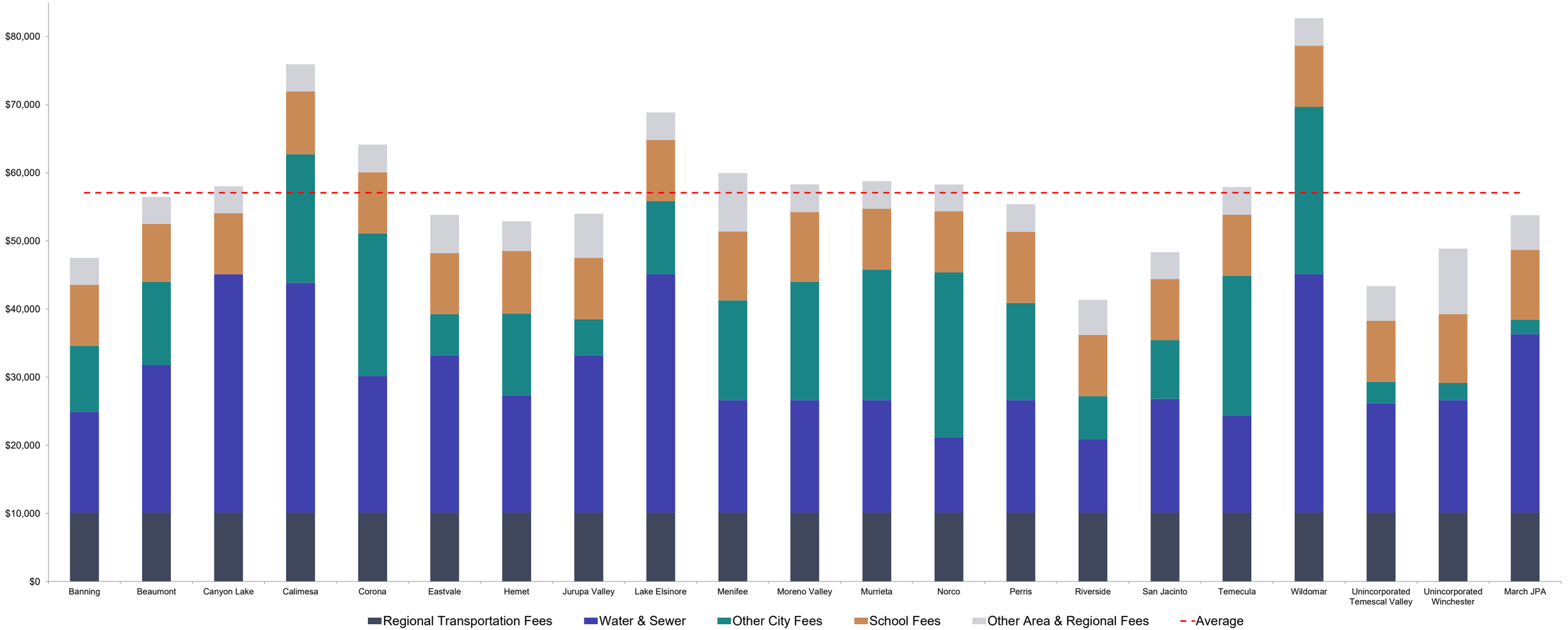
Study Location and Service Provider Assumptions

	City / Location	School District	Water District	Sewer District
Western Riverside Council of Governments				
1	Banning	Banning Unified School District	City of Banning	City of Banning
2	Beaumont	Beaumont Unified School District	Beaumont-Cherry Valley Water District	City of Beaumont Sewer & Refuse Service
3	Calimesa	Yucaipa- Calimesa Joint Unified School District	Yucaipa Valley Water District	Yucaipa Valley Water District
4	Canyon Lake	Lake Elsinore Unified School District	Elsinore Valley Municipal Water District	Elsinore Valley Municipal Water District
5	Corona	Corona-Norco Unified School District	City of Corona	City of Corona
6	Eastvale	Corona-Norco Unified School District	Jurupa Community Services District (JCSD)	Jurupa Community Services District (JCSD)
7	Hemet	Hemet Unified School District	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
8	Jurupa Valley	Jurupa Unified School District	Jurupa Community Services District (JCSD)	Jurupa Community Services District (JCSD)
9	Lake Elsinore	Lake Elsinore Unified School District	Elsinore Valley Municipal Water District	Elsinore Valley Municipal Water District
10	Menifee	Menifee Union (Elementary) & Perris Union (High)	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
11	Moreno Valley	Moreno Valley Unified School District	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
12	Murrieta	Murrieta Valley Unified School District	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
13	Norco	Corona-Norco Unified School District	City of Norco	City of Norco
14	Perris	Perris Union High & Perris Union Elementary	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District
15	Riverside	Riverside Unified School District	City of Riverside	City of Riverside
16	San Jacinto	San Jacinto Unified School District	Eastern Municipal Water District	Eastern Municipal Water District (EMWD)
17	Temecula	Temecula Valley Unified School District	Rancho California Water District	Eastern Municipal Water District (EMWD)
18	Wildomar	Lake Elsinore Unified School District	Elsinore Valley Municipal Water District	Elsinore Valley Municipal Water District
19	Unincorporated Temescal Valley	Corona-Norco Unified School District	Temescal Valley Water District	Temescal Valley Water District
20	Unincorporated Winchester	Menifee Union (Elementary) & Perris Union (High)	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
21	March JPA	Moreno Valley Unified School District	Western Municipal Water District (WMWD)	Western Municipal Water District (WMWD)
San Bernardino County				
1	Fontana	Fontana unified School District	Fontana Water Company	City of Fontana
2	Yucaipa	Yucaipa- Calimesa Joint Unified School District	Yucaipa Valley Water District	Yucaipa Valley Water District
3	San Bernardino	San Bernadino City Unified School District	East Valley Water District	San Bernardino Municipal Water Department
4	Ontario	Ontario-Montclier School District	Inland Empire Utilities Agency	Inland Empire Utilities Agency (formerly Ontario Municipal Utilities Company)
5	Chino	Chino Valley Unified School District	Inland Empire Utilities Agency	Inland Empire Utilities Agency (formerly City of Chino Public Works Department)
6	Rialto	Rialto Unified School District	Rialto Water Services	Rialto Water Services
Coachella Valley Association of Governments				
1	Indio	Desert Sands Unified School District	Indio Water Authority	Valley Sanitary District
2	Palm Desert	Desert Sands Unified School District	Coachella Valley Water District	Coachella Valley Water District
3	Palm Spring	Palm Springs Unified School District	Desert Water Agency	Desert Water Agency

APPENDIX C:

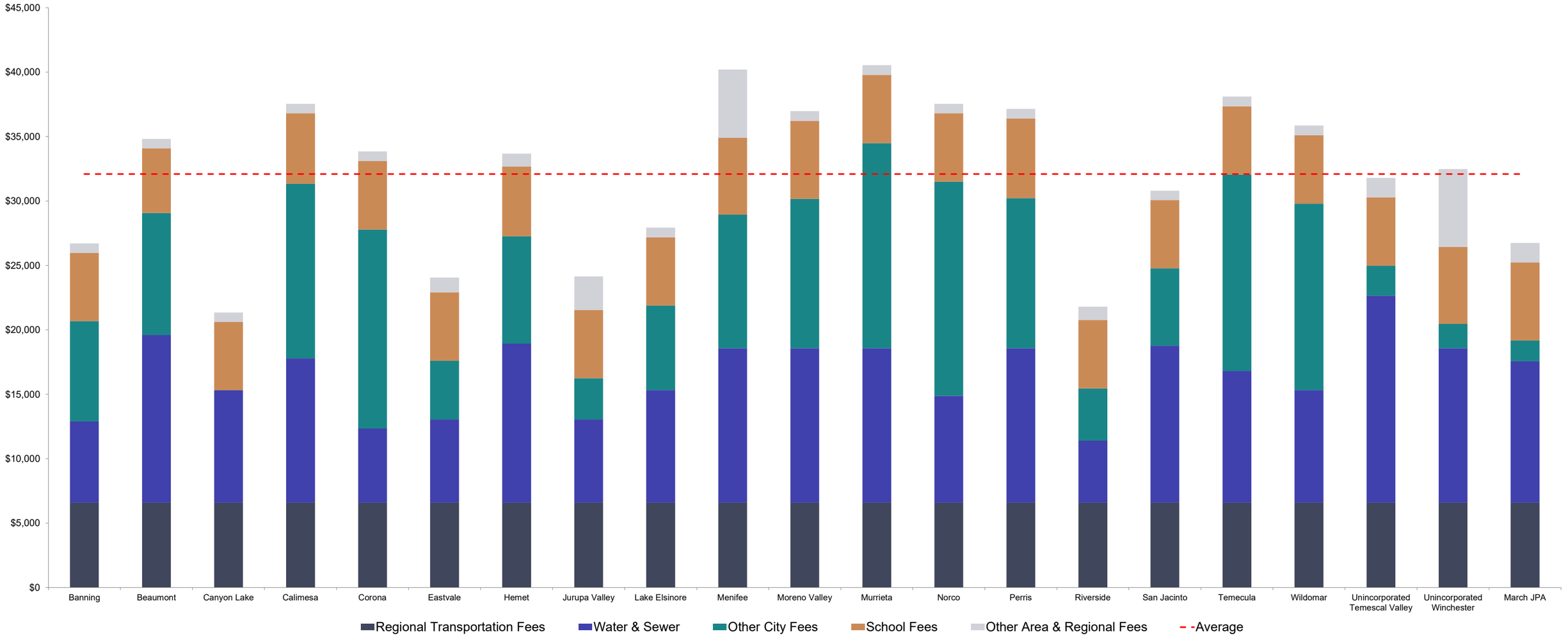
Development Impact Fee Comparison by WRCOG Jurisdictions

Single Family Prototype
Development Fees by Jurisdiction (Per Unit)



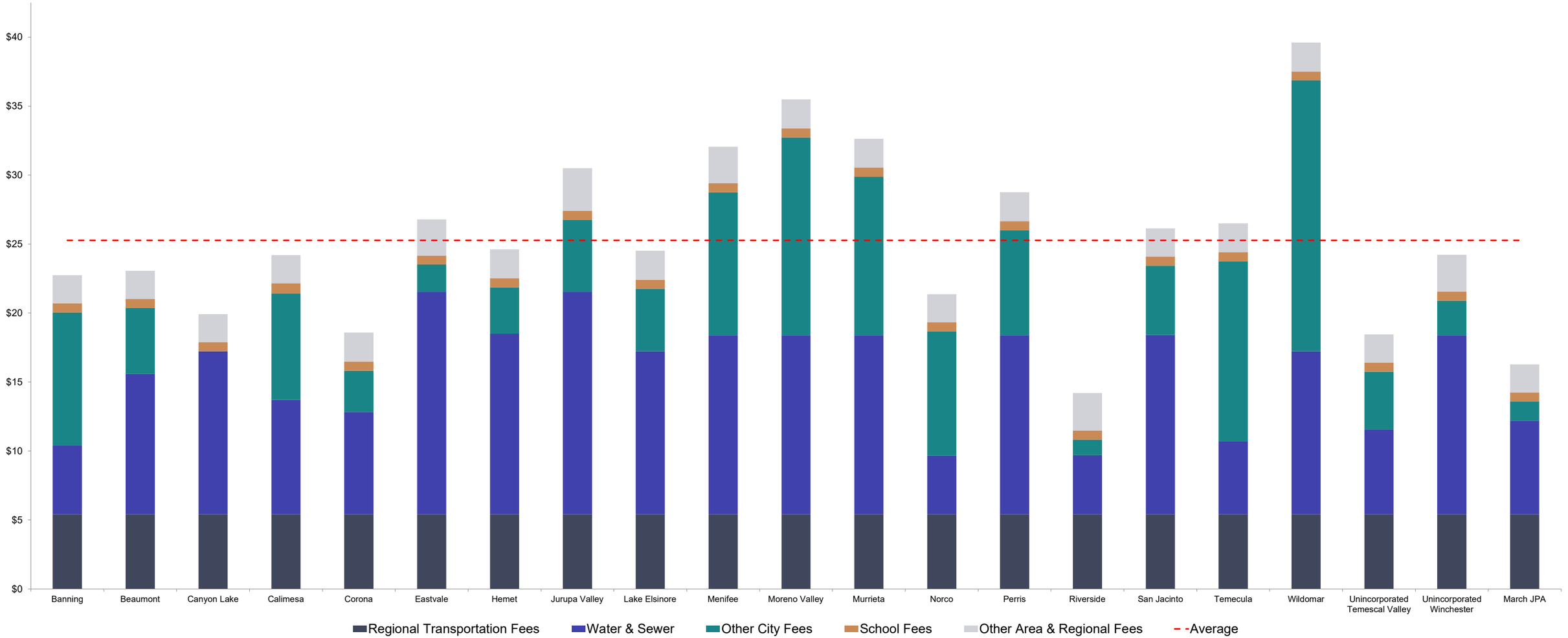
Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.
"Other Area Fees/ Regional Fees" include, but are not limited to, roads and bridges, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.

Multifamily Prototype
Development Fees by Jurisdiction (Per Unit)



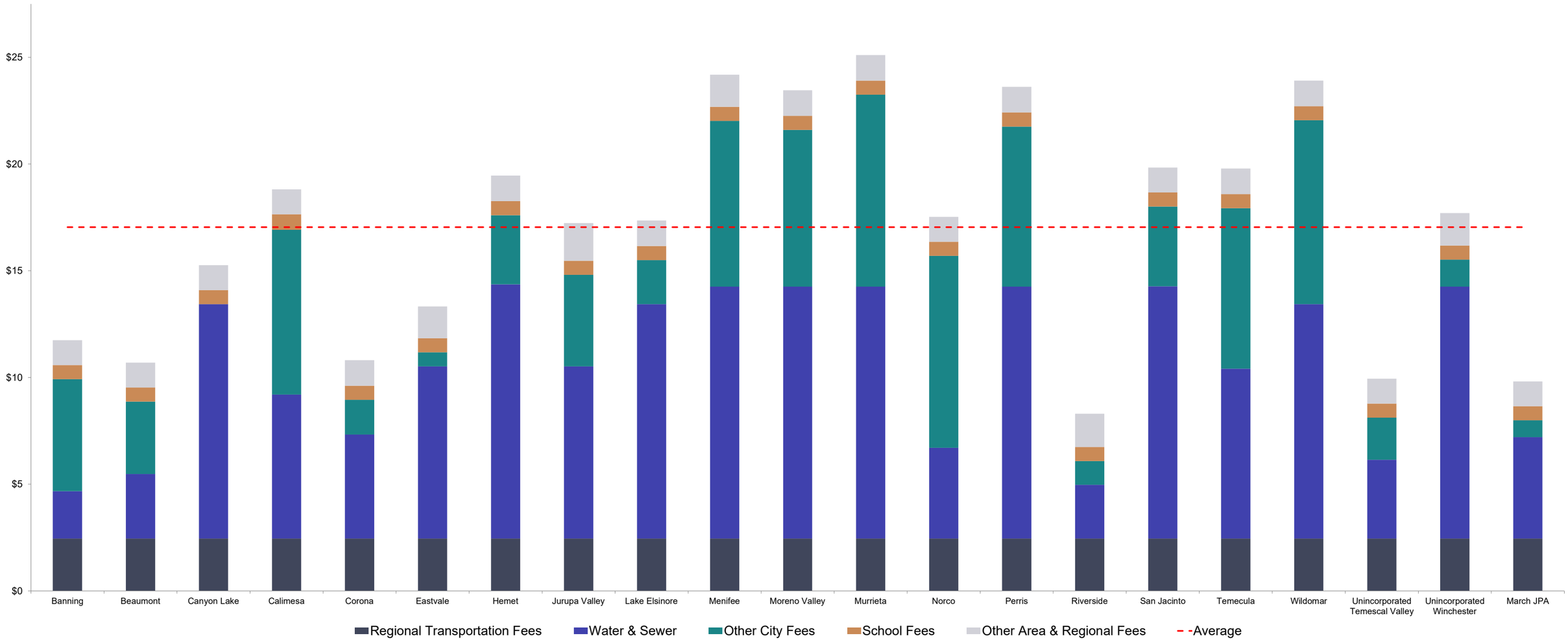
Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.
"Other Area Fees/ Regional Fees" include, but are not limited to, roads and bridges, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.

Retail Prototype
Development Fees by Jurisdiction (Per Square Foot)



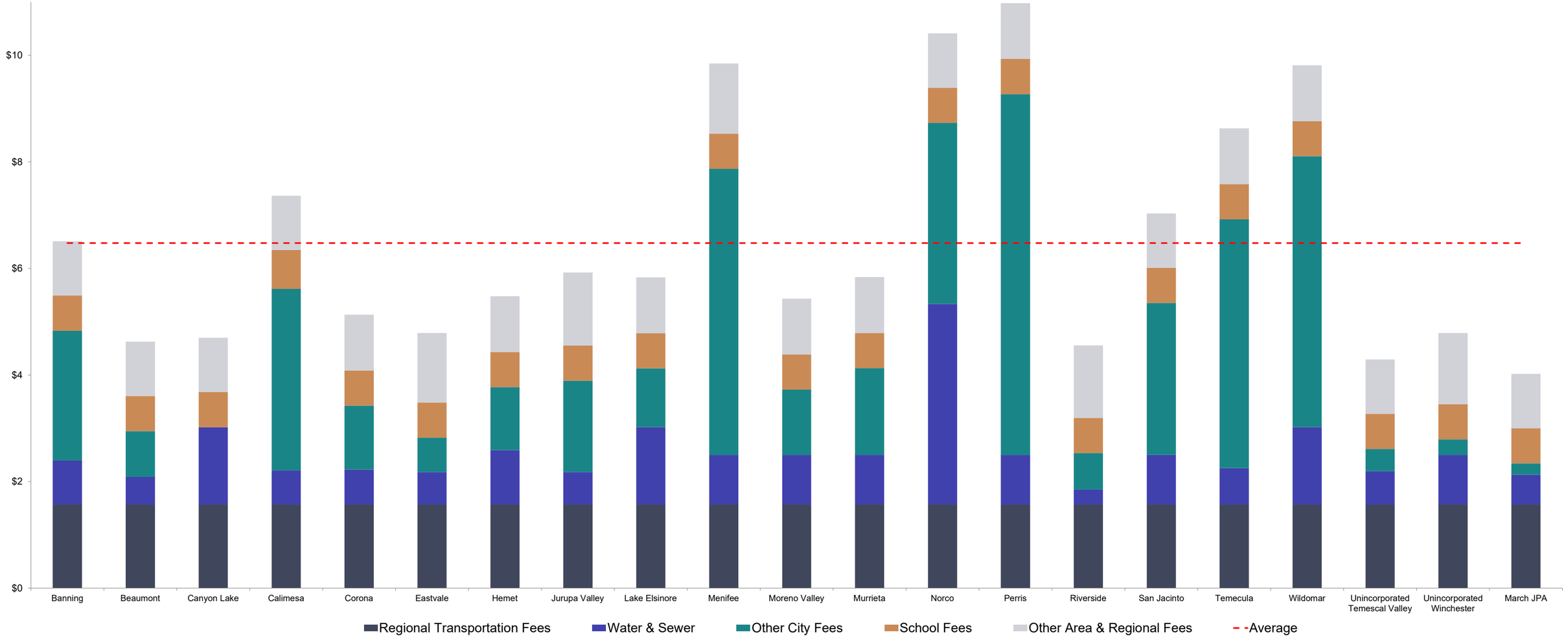
Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.
"Other Area Fees/ Regional Fees" include, but are not limited to, roads and bridges, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.

Office Prototype
Development Fees by Jurisdiction (Per Square Foot)



Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.
"Other Area Fees/ Regional Fees" include, but are not limited to, roads and bridges, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.

Industrial Prototype
Development Fees by Jurisdiction (Per Square Foot)



Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.
"Other Area Fees/ Regional Fees" include, but are not limited to, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.

Western Riverside Council of Governments
Planning Directors Committee

Staff Report

Subject: **Good Neighbor Guidelines for Siting New and/or Modified Warehouse / Distribution Facilities**

Contact: **Chris Gray, Deputy Executive Director, cgray@wrcog.us, (951) 405-6710**

Date: **April 13, 2023**

Requested Action(s):

1. Receive and file.

Purpose:

The purpose of this item is to gather input regarding WRCOG's Good Neighbor Guidelines.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #5 - Develop projects and programs that improve infrastructure and sustainable development in our subregion.

Background:

In January 2003, a Regional Air Quality Task Force was formed to study air quality issues in Western Riverside County. In response to the increased development of warehouses and distribution centers in the region, the Task Force developed the Good Neighbor Guidelines. These guidelines were intended to provide practical measures that could be incorporated into the design of warehouse and distribution centers to minimize adverse effects of diesel emissions, especially for those in close proximity to sensitive receptors. The Good Neighbor Guidelines (Attachment 1) was endorsed by the Executive Committee on September 12, 2005. Nearly 20 years has passed since the original development of these guidelines. Since that time, no updates to the document have been made.

The logistics industry has and continues to drive much of the economy within the Inland Empire. As e-commerce continues to grow and local jurisdictions continue to see warehouse and distribution center development interests, community concerns such as traffic, pollution, community character, and environmental justice also grow. In response, many jurisdictions have adopted a good neighbor policy or guidelines to help mitigate the impacts associated with warehouse and distribution centers. These guidelines also help jurisdictions proactively plan for logistics development within their boundaries. This type of guidance benefits the community and environment but it also can be a benefit to development interests by providing clear and predictable expectations. These are not new issues or ideas, but they have evolved over the past 20 years.

When the Regional Air Quality Task Force was formed in 2003, it sought to develop Good Neighbor Guidelines to meet the following objectives: 1) provide local governments with specific strategies that

can be considered and implemented to minimize potential diesel impacts from new warehouses and distribution centers, and 2) educate existing warehouse and distribution centers about strategies that can be implemented to minimize potential diesel impacts from their operations. In developing the guidance document, several goals were developed, each with corresponding benefits and recommended guidelines. In 2005 when the Good Neighbor Guidelines document was completed, it was endorsed by the Executive Committee.

Since then, more recent guidance has been developed. Several WRCOG cities have developed their own Good Neighbor Guidelines, and in 2022, the Governor's Office of Planning and Research published a document, *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*. Additionally, the South Coast Air Quality Management District has developed new source rules to reduce pollution and promote electrification, and additional requirements for outreach and siting for warehouses are now required in environmental justice communities pursuant to SB 1000. These more recent requirements are generally more stringent than the guidance found in WRCOG's Good Neighbor Guidelines.

WRCOG's principal role is to serve its member agencies. Sometimes this is done by developing a collective voice or direction on key issues; other times this is best achieved by sharing resources and serving as a repository for information. Given the resources currently available, and in acknowledging the uniqueness of each jurisdiction and its community, WRCOG staff believes the topic of warehouse development is best addressed at a local level. WRCOG can assist by acting as a resource and sharing available information, or through the development of new and updated content. Therefore, WRCOG staff seeks to have a discussion with the Planning Directors Committee regarding the Guidelines. The Technical Advisory Committee will be asked to make a recommendation on whether to update or formally rescind the Executive Committee's endorsement of the Good Neighbor Guidelines for Siting New and/or Modified Warehouse / Distribution Facilities (2005).

Prior Action(s):
September 12, 2005: The Executive Committee endorsed the Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities, and directed staff to distribute the document to member jurisdictions with the recommendation to consider adopting all or part of the document into their planning practices.

Fiscal Impact:
If recommended to rescind, this item will result in no fiscal impact. If the document is updated, this activity would be included in the Transportation & Planning Department budget for Fiscal Year 2023/2024, and funded utilizing LTF.

Attachment(s):
Attachment 1 - Good Neighbor Guidelines for Siting Warehouse Distribution Facilities

Good Neighbor Guidelines
For Siting New and/or Modified
Warehouse/Distribution Facilities

(Final, September 12, 2005)

WRCOG

Regional Air Quality Task Force

Western Riverside Council of Governments

4080 Lemon Street, 3rd Fl., MS 1032

Riverside, CA 92501-3679

(951) 955-7985

Acknowledgements

The Western Riverside Council of Governments (WRCOG) staff would like to acknowledge the exceptional contributions made to this document by members of the Regional Air Quality Task Force (RAQTF). Since 2003, WRCOG staff has consistently relied on the RAQTF to provide critical and constructive input on developing and implementing environmental policies and actions.

The RAQTF is convened by WRCOG, and is comprised of representatives from South Coast Air Quality Management, County of Riverside, Office of District 2 Supervisor John F. Tavaglione, Eastern Municipal Water District, American Lung Association of the Inland Counties, Center for Community Action and Environmental Justice, March Joint Powers Authority, City of Riverside, City of Norco, Clean Energy, City of Moreno Valley, and the Waste Haulers Association. Their suggestions and input throughout the development of these guidelines are appreciated.

In particular, the following individuals are acknowledged for their work on this document:

Regional Air Quality Task Force Policy Committee

John Tavaglione, Supervisor, District 2;
John Field, Senior Deputy, Office of Supervisor John Tavaglione, District 2;
Larry Dressel, Mayor, City of Beaumont;
Frank Hall, Council Member, City of Norco;
Ron Loveridge, Mayor, City of Riverside.

Regional Air Quality Task Force Technical Staff

Patricia Burbano-Brenes, City of Riverside;
Patricia Byrd, American Lung Association of the Inland Counties;
Mike Harrod, County of Riverside Planning Department;
Dan McGivney, Eastern Municipal Water District;
Mark Minard, Assistant Engineer, City of Moreno Valley, Public Works/Transportation Engineering Division;
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Penny Newman, Executive Director, Center for Community Action and Environmental Justice;
Paul Ryan, P.F. Ryan and Associates, Inc.;
Matt Shea, Clean Energy;
Colleen Smethers, Center for Community Action and Environmental Justice;
Barbara Spoonhour, Program Manager, Western Riverside Council of Governments;
Rosa Washington, Staff Analyst I, Western Riverside Council of Governments.

Introduction

On January 16, 2003, the Riverside County Board of Supervisors (Board) directed Executive Office staff to initiate the establishment of a Regional Air Quality Task Force to study air quality issues in western Riverside County. This task force was envisioned to be an important tool for implementing air quality mitigation measures for the region.

The Regional Air Quality Task Force (RAQTF) continues to research the different areas of air quality mitigation that is needed for the subregion. Since many communities within the region either have a separate air quality element or address air quality issues in their land use section of their General Plan, the RAQFT undertook the need for a policy for local governments to voluntarily adopt when siting new warehouse/distribution centers. It should be noted that air quality agencies, such as, SCAQMD and CARB have broadly addressed this issue with in their Guidance Documents and Air Quality Handbook, but have not created stand alone documentation. The Guidelines that follow appear to be the first stand alone document that local governments can use when siting warehouses.

The RAQTF has developed these "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities," (referred to as "Good Neighbor Guidelines") to promote and assist planning departments, developers, property owners, elected officials, community organizations, and the general public as a tool to potentially help address some of the complicated choices associated with permitting warehouse/distribution facilities and understanding the options available when addressing environmental issues. These Good Neighbor Guidelines are designed to help minimize the impacts of diesel particulate matter (PM) from on-road trucks associated with warehouses and distribution centers on existing communities and sensitive receptors located in the subregion.

Sensitive receptors are considered:

- Residential Communities;
- Schools;
- Parks;
- Playgrounds;
- Day care centers;
- Nursing homes;
- Hospitals;
- And other public places where residents are most likely to spend time.

Objective

The mission of the RAQTF is to develop air quality measures that can be considered and potentially adopted by local governing bodies to address adverse air quality issues in the inland region through their planning activities.

The RAQTF has developed the Good Neighbor Guidelines to help achieve the following objectives:

- **Provide local governments with specific strategies that can be considered and implemented to minimize potential diesel impacts from new warehouse and distribution centers;**

- **Educate existing warehouse and distribution centers about strategies that can be implemented to minimize potential diesel impacts from their operations.**

Some communities in western Riverside County, because of their proximity to freeways, arterial highways, rail lines, and warehouse/distribution facilities experience higher diesel emissions exposure associated with warehouse/distribution centers than others. In particular, warehouse/distribution center projects sited close to sensitive receptors (homes, schools, parks, day care centers, nursing homes, hospitals and other places public places) can result in adverse health impacts. The reverse is also true – siting sensitive receptors too close to an existing source of diesel emissions can also be a problem.

Audience

These Good Neighbor Guidelines focus on the relationship between land use, permitting, and air quality, and highlight strategies that can help minimize the impacts of diesel emissions associated with warehouse/distribution centers.

The California Resources Air Board (CARB) defines warehouses/distribution centers as facilities that serve as a distribution point for the transfer of goods. Such facilities include cold storage warehouses; goods transfer facilities, and inter-modal facilities such as ports. These operations involve trucks, trailers, shipping containers, and other equipment with diesel engines.

For the purpose of these Guidelines, warehouse/distribution center means a building or premises in which the primary purpose is to store goods, merchandise or equipment for eventual distribution and may include office and maintenance areas. A warehouse or distribution center includes 3 or more loading bays, or is expected to have more than 150 diesel truck trips per day. For the purpose of these Guidelines, a warehouse and distribution center is not intended to include "big box" discount or warehouse stores that sell retail goods, merchandise or equipment, or storage and mini-storage facilities that are offered for rent or lease to the general public.

While the primary users of these Guidelines will likely be agencies responsible for land use planning and air quality, they may also be useful for:

- Planners;
- Architects;
- Developers;
- Elected officials;
- School districts;
- Community advisory councils;
- Public/community organizations.

Purpose

The purpose of the Good Neighbor Guidelines is to provide local government and developers with a variety of strategies that can be used to reduce diesel emissions from heavy-duty trucks that are delivering goods to and from warehouse and distribution centers.

In 1998, the SCAQMD conducted its second Multiple Air Toxics Emissions Study (MATES II) [1]. Considered the nation's most comprehensive study of toxic air pollution to date, the study found that:

- Diesel exhaust is responsible for about 70 percent of the total cancer risk from air pollution;
- Emissions from mobile sources -- including cars and trucks as well as ships, trains and planes -- account for about 90 percent of the cancer risk. Emissions from businesses and industry are responsible for the remaining 10 percent; and
- The highest cancer risk occurs in south Los Angeles County -- including the port area-- and along major freeways.

The RAQTF is recommending that the Good Neighbor Guidelines be approved by WRCOG member jurisdictions and considered for all new warehouse/distribution centers that attract diesel trucks. Implementation of the recommended guidance for proposed facilities is technically more feasible than retroactive application to existing warehouse/distribution centers. However and as previously mentioned, there is an educational component of these Guidelines aimed at existing facilities. There are mechanisms in the planning process that will encourage developers to incorporate the recommended guidelines upfront in the design phase of a project.

The RAQTF recommends that jurisdictions consider these Guidelines when issuing permits such as conditional use permits, or zoning permits. In addition, the recommended Guidelines can be used to mitigate potentially significant adverse environmental impacts that are identified under the California Environmental Quality Act (CEQA). The recommended Guidelines are intended to be used for new warehouses and can be incorporated in the design phase of the proposed warehouse or distribution center. Many of the recommended guidelines can, however, be incorporated into existing facilities.

The recommended Guidelines format identifies the overall goal, benefits and the recommended strategies that can be implemented to achieve the goal. The Guidelines include a series of strategies that can be implemented in part or whole, or tailored to the specific needs of a project. The purpose of the guidelines is to provide a general framework for planners and developers regarding how they can achieve a specified goal.

It should be noted that CARB has adopted two airborne toxic control measures that will reduce diesel particulate materials (PM) emissions associated with warehouse/distribution centers. The first will limit nonessential (or unnecessary) idling of diesel-fueled commercial vehicles, including those entering from other states or countries. This measure prohibits idling of a vehicle for more than five minutes at any one location. The second measure requires that transport refrigeration units (TRUs) operating in California become cleaner over time. The measure establishes in-use performance standards for existing TRU engines that operate in California, including out-of-state TRUs. The requirements are phased-in beginning in 2008, and extend to 2019.[2]

CARB also operates a smoke inspection program for heavy-duty diesel trucks that focuses on reducing truck emissions in California communities. Areas with large numbers of distributions centers are a high priority.

While CARB has these measures in place, local agencies need to acknowledge that the enforcement of these measures is through the California Highway Patrol and do not provide a swift resolve to local air quality issues. Local agencies can adopt local control measures, like the ones being mentioned, that can be enforced by code enforcement and law enforcement officials and provide a more immediate affect to the regions air quality.

Recommended Local Guidelines

1. Goal: Minimize exposure to diesel emissions to neighbors that are situated in close proximity to the warehouse/distribution center.

Benefits:

1. Reduces exposure of diesel emissions to residences and other sensitive receptors.
2. Reduces potential future health, odor and noise related issues, particularly when in close proximity to residential neighborhoods.

Recommended Strategies:

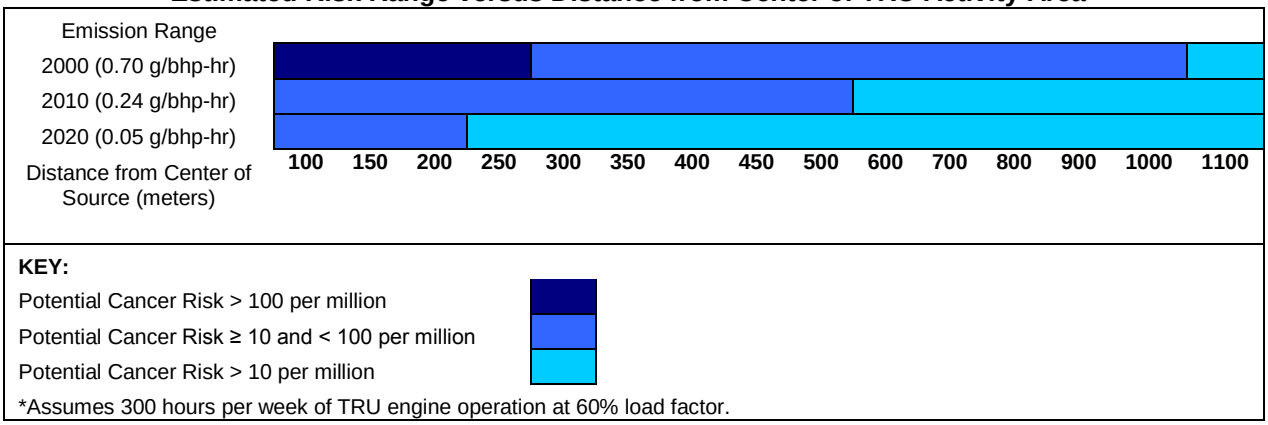
- Create buffer zone of at least 300 meters (roughly 1,000 feet, can be office space, employee parking, greenbelt) between warehouse/distribution center and sensitive receptors (housing, schools, daycare centers, playground, hospitals, youth centers, elderly care facilities, etc.);
- Site design shall allow for trucks to check-in within facility area to prevent queuing of trucks outside of facility;
- Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points[3];
- Design warehouse/distribution center so that interior vehicular circulation shall be located away from residential uses or any other sensitive receptors.

Why do we suggest buffer zones?

The reduction of potential cancer risk levels at locations where TRUs operate is a direct result of the reduction of diesel PM emissions. Figure 1-1 compares the cancer risk range at various distances assuming 300 hours of TRU activity per week. For year 2000, the current fleet average emission rate of 0.7 g/bhp-hr was used. In 2020, the statewide fleet PM emission rate would be reduced 92 percent from the 2000 baseline year to 0.05 g/bhp-hr. Figure 1-1 below illustrates the significant reduction of the estimated near source risk as the diesel PM emission rate is reduced from the current fleet emission rate to the much lower emission rate in 2020.[4]

Figure 1-1

Estimated Risk Range versus Distance from Center of TRU Activity Area*



2. Goal: Eliminate diesel trucks from unnecessarily traversing through residential neighborhoods.

Benefits:

1. Reduces exposure of diesel emissions to residences and other sensitive receptors.
2. Reduces or eliminate trucks in residential neighborhoods.
3. Reduces truckers travel time if key destinations are clearly identified.

Recommended Guidelines:

- Require warehouse/distribution centers to clearly specify on the facility site plan primary entrance and exit points;
- Require warehouse/distribution centers to establish specific truck routes and post signage between the warehouse/distribution center and the freeway and/or primary access arterial that achieves the objective. The jurisdiction may not have an established truck route, but may take the opportunity to consider the development of one;
- Provide food options, fueling, truck repair and or convenience store on-site or within the warehouse/distribution center complex;
- Require warehouse/distribution centers to provide signage or flyers identifying where food, lodging, and entertainment can be found, when it is not available on site;

3. Goal: Eliminate trucks from using residential areas and repairing vehicles on the streets.

Benefits:

1. Reduces exposure of diesel emissions to residences and sensitive receptors.

Recommended Guidelines:

- Allow homeowners in the trucking business to acquire permits to park vehicles on property, residential areas or streets;
  Note: Some jurisdictions already restrict parking of oversized vehicles on residential streets regardless of ownership.
- Establish overnight parking within the warehouse/distribution center;
- Allow warehouse/distribution facilities to establish an area within the facility for repairs.

4. Goal: Reduce and/or eliminate diesel idling within the warehouse/distribution center

Benefits:

1. Reduces exposure of diesel emissions to residences and other sensitive receptors.

Recommended Guidelines:

- Require the installation of electric hook-ups to eliminate idling of main and auxiliary engines during loading and unloading, and when trucks are not in use;
- Train warehouse managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks within the facility;
- Require signage that informs truck drivers of the California Air Resources Board (CARB) regulations (which include anti-idling regulations);
- Post signs requesting that truck drivers turn-off engines when not in use;
- Restrict idling within the facility to less than ten (10) minutes.

5. Goal: Establish a diesel minimization plan for on- and off-road diesel mobile sources to be implemented with new projects.

Benefits:

1. Reduces exposure of diesel emissions to residences and sensitive receptors.
2. Establishes long-term goal for facility to eliminate diesel emissions at the facility.
3. Reduces on- and off-road diesel emissions that are associated with use of the facility.

Recommended Guidelines:

- Encourage warehouse/distribution center fleet owners to replace their existing diesel fleets with new model vehicles and/or cleaner technologies, such as electric or compressed natural gas;
- Require all warehouse/distribution centers to operate the cleanest vehicles available;
- Provide incentives for warehouses/distribution centers and corporations which partner with trucking companies that operate the cleanest vehicles available;
- Encourage the installation of clean fuel fueling stations at facilities.

6. Goal: Establish an education program to inform truck drivers of the health effects of diesel particulate and the importance of reducing their idling time.

Benefits:

1. Educates truck drivers of the health effects of diesel particulate to encourage drivers to implement diesel reduction measures.

Recommended Guidelines:

- Provide warehouse/distribution center owners/managers with informational flyers and pamphlets for truck drivers about the health effects of diesel particulates and the importance of being a good neighbor. The following information should include:

    - Health effects of diesel particulates;
    - Benefits of minimizing idling time;
    - ARB idling regulations;
    - Importance of not parking in residential areas.

7. Goal: Establish a public outreach program and conduct periodic community meetings to address issues from neighbors.

Benefits:

1. Informs the community regarding proactive strategies that the warehouse/distribution center has or is doing to reduce exposure to diesel particulate.
2. Allows the warehouse/distribution center to be more proactive.
3. Encourages partnerships to develop solutions for both parties.

Recommended Guidelines:

- Encourage facility owners/management to conduct periodic community meetings inviting neighbors, community groups, and other organizations;
- Encourage facility owners/management to have site visits with neighbors and members of the community to view measures that the facility has taken to reduce/and or eliminate diesel particulate emissions;
- Encourage facility owners/management to coordinate an outreach program that will educate the public and encourage discussion relating to the potential for cumulative impacts from a new warehouse/distribution center.
- Provide facility owners/management with the necessary resources and encourage the utilization of those resources such as, the California Air Resources Board (ARB) and the South Coast Air Quality Management District regarding information about the types and amounts of air pollution emitted in an area, regional air quality concentrations, and health risks estimates for specific sources;
- Require the posting of signs outside of the facility providing a phone number where neighbors can call if there is an air quality issue.

Recommended Regional Guidelines

The following guidelines can be implemented at the regional level for the siting of new and/or modified warehouses/distribution center (s):

- Develop, adopt and enforce truck routes both in and out of a jurisdiction, and in and out of facilities;

- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;

- Promote the benefits of fleets rapidly adopting cleaner technologies;

- Provide incentives for local fleets to acquire cleaner technologies that can reduce idling;

- Adopt and implement the regional idling ordinance (being developed by this task force) to minimize idling at delivery locations warehouses, truck stops, etc;

- Provide local warehouses/distribution facilities incentives to reduce idling (i.e. reduce noise);

- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;

- Educate the local enforcement agencies (including law enforcement) on diesel emissions minimization strategies (specifications, how, etc.);

- Educate local governments of potential air quality impacts;

- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods.

GLOSSARY OF KEY TERMS

Buffer Zone: An area of land separating one parcel or land from another that acts to soften or mitigate the effects of one land use on the other.

California Environmental Quality Act (CEQA): A California law that sets forth a process for public agencies to make informed decisions on discretionary projects approvals. The process helps decision-makers determine whether any potential, significant, adverse environmental impacts are associated with a proposed project and to identify alternatives and mitigation measures that will eliminate or reduce such adverse impacts.

Distribution Center: See Warehouse

Idling: The operation of the engine of a vehicle while the vehicle is not in motion.

Land Use Agency: Local government agency that performs functions associated with the review, approval, and enforcement of general plans and plan elements, zoning, and land use permitting. For the purpose of these Guidelines, a land use agency is typically a local planning department.

Mobile Source: Sources of air pollution such as automobiles, motorcycles, trucks, off-road vehicles, boats, trains and airplanes.

Ordinance: A law adopted by a City Council or County Board of Supervisors. Ordinances usually amend, repeal or supplement the municipal code; provide zoning specifications; or appropriate money for specific purposes.

Risk: For cancer health effects, risk is expressed as an estimate of the increase chances of getting cancer due to facility emissions over a 70-year lifetime. This increase in risk expressed as chances in a million (e.g., 1,400 in a million).

Stationary Sources: Non-mobile sources such as manufacturing facilities, power plants, and refineries.

Warehouse(s): For the purpose of these Guidelines, warehouse/distribution center means a building or premises in which the primary purpose is to store goods, merchandise or equipment for eventual distribution and may include office and maintenance areas. A warehouse or distribution center includes 3 or more loading bays, or is expected to have more than 150 diesel truck trips per day. For the purpose of these Guidelines, a warehouse and distribution center is not intended to include “big box” discount or warehouse stores that sell retail goods, merchandise or equipment, or storage and mini-storage facilities that are offered for rent or lease to the general public

Zoning Ordinances: City councils and county boards of supervisors adopts zoning ordinances that set forth land use classifications, divides the county or city into land use zones as delineated on the official zoning, maps, and set enforceable standards for future development.

References

1. *Multiple Air Toxics Emissions Study (MATES II) (2000).* South Coast Air Quality Management District.

2. Air Quality and Land Use Handbook: A Community Health Perspective. (April 2005) California Air Resources Board.

3. Air Quality and Land Use Handbook: A Community Health Perspective. (April 2005) California Air Resources Board.

4. Air Quality and Land Use Handbook: A Community Health Perspective. (April 2005) California Air Resources Board.

Western Riverside Council of Governments
Planning Directors Committee

Staff Report

Subject: **Presentation on Fire Hazard Maps**

Contact: **Aaron Pfannenstiel, Founding Principal/ Chief Financial Officer, Atlas Planning Solutions, aaron@atlasplanning.org, (909) 374-4828**

Date: **April 13, 2023**

Requested Action(s):

1. Receive and file.

Purpose:

The purpose of this item is explain CALFIRE fire hazard mapping updates and describe the implications for local agencies.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #6 - Develop and implement programs that support resiliency for the subregion.

Background:

Significant portions of the State of California are prone to wildfires and cities and counties are regularly managing these risks. However, significant growth within the Wildland Urban Interface (WUI) has required a response by the California Department of Forestry and Fire Protection (CAL FIRE) that affects the planning within these areas. Since 2007, CAL FIRE has worked to inform agencies most at risk of wildfire hazards through mapping and analysis that helps understand and regulate these areas. In 2022, CAL FIRE released updated maps for State Responsibility Areas that re-assesses fire severity zones throughout the state. In 2023, this process will also provide updated mapping for the Local Responsibility Areas (Cities / Special Districts) changing the way we perceive and manage risk in fire prone areas.

To better understand the nuances associated with these maps and regulations, Aaron Pfannenstiel, Principal from Atlas Planning Solutions, will provide information on the following:

- Who / What is CAL FIRE and the Board of Forestry and Fire Protection
- What is the difference between Local and State Responsibility Areas
- What are Fire Safe Regulations
- What is required for a General Plan Safety Element
- What data is currently available for Safety Element Updates
- What changes are on the horizon
    - Fire Safe Regulation Updates
    - State Responsibility Areas (SRA) Mapping Updates

- Local Responsibility Areas (LRA) Mapping Updates

Prior Action(s):
None.

Fiscal Impact:
This item is for informational purposes only; therefore, there is no fiscal impact.

Attachment(s):
None.

Western Riverside Council of Governments
Planning Directors Committee

Staff Report

Subject: REAP SRP 2.0 Local Housing Assistance Requests

Contact: Suzanne Peterson, Analyst III, speterson@wrcog.us, (951) 405-6719

Date: April 13, 2023

Requested Action(s):

1. Receive and file.

Purpose:

The purpose of this item is to notify PDC members of upcoming local housing assistance availability through the Regional Early Action Planning (REAP) Grant, Subregional Partnership (SRP) Program 2.0 allocation to WRCOG.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #2 - Identify and help secure grants and other potential funding opportunities for projects and programs that benefit member agencies.

Background:

SCAG is receiving a second allocation of funding though the Regional Early Action Planning (REAP) Grant of 2021, deemed "REAP 2.0," a flexible program that seeks to accelerate progress towards State housing goals and climate commitments through a strengthened partnership between the State of California, its regions, and local entities. One of the programs under REAP 2.0 is another iteration of the Subregional Partnership Program (SPR) of which WRCOG is set to receive and allocation of $1.6M. The WRCOG Executive Committee has directed staff to apply for the funding and submit an application to SCAG, once it becomes available. After WRCOG has officially been awarded the funding and an MOU with SCAG is established, WRCOG may begin work on the various proposed projects.

Through SCAG's REAP SRP 2.0 program, WRCOG plans to continue providing direct local assistance on implementation-related housing activities. Eligible activities include:

- Land use planning, related studies, and/or programs that result in implementable / adoptable programs and policies (meaning subject to adoption or approval of the legislative body) required to meet the programs, projects, and commitments in draft, adopted and/or compliant 6th cycle Housing Elements.
- Outreach supporting programs, projects, or plans required in draft, adopted and/or compliant 6th cycle Housing Elements, and consistent with SCAG's adopted Racial Equity Action Plan.
- Housing strategies for increasing supply and lasting affordability including strategic planning and/or seed funding for subregional housing trust funds and community land trusts in compliance

with the Guidelines.
- Technical assistance to implement the eligible activities and uses listed above, including temporary staffing and consultant costs.

WRCOG also seeks to assist interested cities in applying for the Pro-housing Designation. WRCOG would provide assistance with application development, submittal, and addressing California Department of Housing and Community Development comments towards a successful submission. WRCOG would encourage any interested cities to act quickly, as the Pro-housing Designation application will become more onerous beginning in 2024.

While the REAP SRP application is not yet available, WRCOG staff seeks to engage cities now in order to provide requested assistance as soon as the funding is available. Project approval and specific timelines are subject to SCAG approval.

Prior Action(s):
March 16, 2023: The Technical Advisory Committee received and filed.

April 13, 2023: The Executive Committee directed staff to submit a grant application to the Southern California Association of Governments for the SRP under the REAP 2.0 Program in the amount of $1.6M.

February 9, 2023: The Planning Directors Committee received and filed.

Fiscal Impact:
WRCOG's SRP grant application, if approved by SCAG, will allow WRCOG to secure up to $1.6M in funding through the REAP 2.0 Program. Once this grant application is approved by SCAG, WRCOG and SCAG will execute an MOU which will allow WRCOG to secure this funding. This MOU will be brought to the WRCOG Executive Committee for its approval at a subsequent meeting. WRCOG anticipates that this revenue will be available starting July 1, 2023, and WRCOG will therefore include the revenue in the Fiscal Year 2023/2024 Agency Budget.

Attachment(s):
None.

Western Riverside Council of Governments
Planning Directors Committee

Staff Report

Subject: **Housing Element Compliance**

Contact: **Colin Drukker, Principal, PlaceWorks, cdrukker@placeworks.com, (714) 966-9220**

Date: **April 13, 2023**

Requested Action(s):

1. Receive and file.

Purpose:

The purpose of this item is to provide information on Housing Element compliance.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #2 - Identify and help secure grants and other potential funding opportunities for projects and programs that benefit member agencies.

Background:

WRCOG is utilizing Regional Early Action Planning (REAP) grant funding to provide member agencies a closer look into the implications and potential impacts of Housing Element compliance and non-compliance.

Colin Drukker, Principal with PlaceWorks, will provide a brief overview of current Housing Element law, with a focus on implications of compliance (today and throughout the planning period). This includes timelines, requirements, penalties, triggers related to other state laws, and an overview of recent litigation. PlaceWorks will also be available to provide limited assistance to jurisdictions, with strategies to achieve compliance and certification.

Prior Action(s):

None.

Fiscal Impact:

Transportation & Planning Department activities are included in the Agency's adopted Fiscal Year 2022/2023 Budget under the Transportation Department. This item is covered by REAP funding that has been approved by SCAG; this funding source is identified in the Fiscal Year 2022/2023 Budget.

Attachment(s):

None.