



## Community Development Department

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Kome Ajise, Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

**RE: A REQUEST BY THE CITY OF SOUTH GATE TO RECONSIDER THE ALTERNATIVE RHNA METHODOLOGY FOR THE 6<sup>TH</sup> CYCLE BY WAY OF SUBSTITUTE MOTION AND TO AMEND THE RHNA METHODOLOGY**

Dear Mr. Ajise,

This letter is to inform you of the City of South Gate's formal opposition to the Southern California Association of Governments (SCAG) Regional Council's November 7, 2019 approval of the substitute motion for an Alternative RHNA Methodology introduced by the City of Riverside. The City of South Gate, along with other cities within the Gateway Cities Council of Governments are greatly concerned that the Regional Council's action appears to have been the result of a non-transparent, coordinated effort between select members of the Regional Council and SCAG in violation of public meeting law. Furthermore, this decision completely dismissed the input provided to SCAG by numerous cities over the last few years.

### Direction Provided to SGAG Staff Regarding Analysis of Alternative RHNA Methodology

It is believed that certain Regional Council Members instructed SCAG Staff to further analyze the Alternative Methodology soon after the RHNA Subcommittee rejected the Alternative Methodology at its October 7, 2019 meeting. This direction was given without the approval of the RHNA Subcommittee, without a majority vote of the Regional Council at a public meeting, and without the knowledge of cities located outside San Bernardino and Riverside Counties.

### Public Notification Regarding Presentation of Alternative RHNA Methodology

The City of South Gate and other cities were given insufficient notice that SCAG intended to present the previously rejected Alternative Methodology at the November 7, 2019 Regional Council meeting. Cities were first notified through an e-mail from SCAG staff, only two days prior to the November 7, 2019 Regional Council meeting, that SCAG staff would be presenting the Substitute Motion as an option to be considered along with SCAG Staff's Recommended RHNA Methodology. This inadequate public noticing failed to allow cities sufficient time to review or comment on the implications of the Alternative Methodology.

## Request for Regional Council Reconsideration

Due to the aforementioned actions taken by the Regional Council and SCAG, the City of South Gate respectfully requests that the Regional Council reconsider its decision to recommend the Alternative Methodology through Substitute Motion. By reconsidering this decision at a duly noticed public hearing, the Regional Board will ensure a transparent process, provide cities an opportunity to fully analyze and compare the impacts of the Alternative Methodology with SCAG Staff's Recommended Methodology, and provide an opportunity for the development of an improved distribution of housing units throughout the region.

## Recommended Amendments RHNA Methodology

The City is willing to provide its fair share of the regional housing need, however, South Gate's proposed 6<sup>th</sup> Cycle allocation of 8,232 housing units is over **550%** of the City's 5<sup>th</sup> Cycle RHNA (1,262 units). To achieve this goal, the City of South Gate would have to increase its current housing stock by **33%** in the next 8 years. As stated in previous written comments to SCAG, the City of South Gate requests that the Regional Board approve a RHNA methodology that includes the following factors:

### **Recognize Existing Density of Local Jurisdictions**

Existing population density of the communities should be a consideration with distributing the RHNA. According to data provided by SCAG, the City of South Gate's population density is at 20.6 persons per acre. The City's density ranks 12<sup>th</sup> among SCAG's 197 member cities and counties. The City of South Gate is a working class city of 96,000 residents with a density of greater than 13,000 residents per square mile. South Gate, along with our neighboring cities of Maywood, Bell, Cudahy, and Huntington Park are all included in the top 15 most dense cities in the State and South Gate ranks 70<sup>th</sup> in the entire nation (out of 19,000+ cities) in density.

The City (at 20.6 person per acre) is 250 percent more dense than the regional average (8.3 persons per acre). As a densely populated community, the City already has higher burdens on its infrastructure and roads, open space, schools, and other services. Coupled with the City's lower income population, the City struggles to provide adequate services for its existing population.

It would be a significantly inequitable allocation if cities received any allocation with a methodology factor based on population share without taking into account density. And the State RHNA law per Government Code Section 65584 requires the RHNA allocation methodology increase housing supply "in an equitable manner."

Less dense cities would have more land area to accommodate future housing. By definition, cities with equal population size but less density (population per acre) would have a larger total city land area (assuming that any protected/non-developable areas are equal or accounted for) to address future growth demands. For instance, two cities with equal population would get the same allocation for any methodology factor using population share factor, but if one city is 250% more dense than the average SCAG density (such as South Gate), then the average lesser dense city would have 250% or 2.5 times more area to accommodate the housing than the higher density city. (Example: City A with 20 persons per acre has the same population in 100 acres [2,000 people] as City B with 8 persons per acre would have in 250 acres [2,000 people] which is 2.5 times larger land area to more easily accommodate added housing).



### **Include an Environmental Justice Factor**

The City of South Gate urges SCAG and RHNA Subcommittee to consider the application of CalEnviroScreen or other comparable local tool if available, to determine RHNA allocation. This well-established environmental justice mapping tool identifies those communities most affected by various sources of pollution, both mobile and stationary. This is especially critical as most High Quality Transit Areas (HQTAs) fall within the top 25 percent of the CalEnviroScreen score, which translates to “disadvantaged communities.” Incorporating an environmental justice factor into the RHNA methodology will help mitigate the overconcentration of lower income households who are exposed to various health risks from pollutants.

The California Environmental Protection Agency (CalEPA) has designated the City of South Gate as part of the “Disadvantaged Communities” list which make up 25% of the highest scoring census tracts with socioeconomic, public health and environmental hazard criteria. The City of South Gate has been identified to be disproportionately impacted by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation. CalEPA and the Office of Environmental Health Hazard Assessment (OEHHA) has also identified South Gate to fall in the bottom 5<sup>th</sup> percentile of cities with the most potential for health risks stemming from pollution. An increase in housing density in these and nearby areas has the potential to negatively exacerbate the existing and formidable health problems faced by our residents.

For South Gate, 16 percent of the City’s land has been developed as industrial uses and heavy truck traffic frequents the Firestone and Atlantic Boulevards, as well as along the 710-Freeway. CalEnviroScreen indicates much of the City is already exposed to high levels of environmental hazards.

Cities throughout the Gateway Cities COG region face additional challenges beyond land dedicated to industrial uses and density constraints. The majority of cities and unincorporated communities in the Gateway Cities COG region are identified as both disadvantaged and low-income communities by SB 535 through OEHHA’s CalEnviro Screen 3.0 and AB 1550 through CARB’s Priority Population Maps respectively, and in many cases are also in the top five-percent of the most disadvantaged locations in the state when environmental hazards, health and socioeconomic factors are considered. Environmental justice demands that we address these hazards and conditions but also informs that we cannot continue to concentrate new housing in these areas until existing infrastructure and health issues are addressed. Due to economic changes over time, many Gateway Cities are also already housing-rich and jobs-poor, meaning creation of new housing would exacerbate rather than correct jobs-housing imbalances in this region. We note that RHNA methodologies for other MPOs, including ABAG, account for employment rather than simply transit and population in determining allocations.

We appreciate your consideration and look forward to working with SCAG on the RHNA process. Please feel free to contact me at (323) 563-9566 or [jperez@sogate.org](mailto:jperez@sogate.org) if you have any questions.

Sincerely,



Joe Perez  
Community Development Director

