



**GATEWAY CITIES**  
COUNCIL OF GOVERNMENTS

September 5, 2019

Artesia

Avalon

Bell

Bellflower

Bell Gardens

Cerritos

Commerce

Compton

Cudahy

Downey

Hawaiian Gardens

Huntington Park

Industry

La Mirada

Lakewood

Long Beach

Lynwood

Maywood

Montebello

Norwalk

Paramount

Pico Rivera

Santa Fe Springs

Signal Hill

South Gate

Vernon

Whittier

County of Los Angeles

Port of Long Beach

The Honorable Peggy Huang, Chair  
RHNA Subcommittee  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

Dear Ms. Huang:

**PUBLIC COMMENTS REMITTED BY THE GATEWAY CITIES COUNCIL  
OF GOVERNMENTS (GATEWAY CITIES COG) CONCERNING THE  
DRAFT REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)  
METHODOLOGY PROPOSED BY THE SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS (SCAG)**

On behalf of our twenty-seven member cities of southeast Los Angeles County, as well as unincorporated areas of the County of Los Angeles and the Port of Long Beach, the Gateway Cities Council of Governments (Gateway Cities COG) thanks the Southern California Association of Governments (SCAG) and specifically the RHNA Subcommittee for their important work in shaping the appropriate RHNA methodology for the region and all of its member jurisdictions. The purpose of this letter is to share our concerns with the Draft RHNA Methodology (Draft Methodology) and its impact on our member jurisdictions.

The Gateway Cities COG is deeply concerned that unless adjusted, the Draft Methodology does not take into consideration the socioeconomic and cultural factors that characterize a large majority of our communities, resulting in a disproportionate and excessive number of affordable housing units being assigned to the Gateway Cities COG region at the expense of disadvantaged, densely populated and built-out communities. Additionally, said Draft Methodology does not take into account the Gateway Cities COG region's unique geographical location that provides for the existence of two of the world's largest sea ports and the Nation's most expansive freeway system. The infrastructure and logistical needs required to support the Port of Los Angeles and Port of Long Beach, as well as the area of land dedicated to local freeways, limits the total available land area within the Gateway Cities COG region that is suitable for residential development.

In addition to the referenced constraints, it is imperative to understand that the production of housing is not driven by RHNA or the willingness of local municipalities to permit housing, but rather economic factors beyond the control of local government that fuel private investment in the “for profit” business of housing development. For example, during the current RHNA cycle, cities in the Gateway Cities COG region experienced significant economic challenges presented by the dissolution of redevelopment in 2012 (Dissolution), that provided significant funding to support the promotion and creation of affordable housing, and the recession (Great Recession), which adversely affected the production of housing. It is evident that Dissolution and the Great Recession together impacted the ability of cities to facilitate the production of housing during the current RHNA cycle. Nevertheless, cities have been informed that unbuilt units will “roll over” into the next RHNA cycle effectively burdening local municipalities with additional housing units due to external economic factors that were beyond their control.

It is for this reason that the Gateway Cities COG requests that SCAG develop a Draft Methodology that takes into account the external economic factors such as interest rates, inflation, and property value, as well as economic anomalies like Dissolution and the Great Recession that have a direct impact on the production of housing. Therefore, it is recommended that historical economic trends, together with projected economic forecasts, be reflected in the Draft Methodology in order to establish realistic and attainable housing goals. Furthermore, economic factors that have deterred the production of housing units during a particular RHNA cycle should be accounted for when determining how many units will be required to “roll over” into the next RHNA cycle as a “true up” and/or correction to the number of housing units originally assigned to each municipality.

Based on our analysis and our feasible ability to accommodate housing, we recommend certain key provisions in the final Draft Methodology:

- This cycle of RHNA should include a credit to those jurisdictions that have facilitated housing creation and increased density in previous cycles. Current RHNA allocations should be dismissed due to economic anomalies (Dissolution and the Great Recession).
- The Draft Methodology should be adjusted to account for existing open space areas and open space deficiencies, high levels of existing density, existing single-family residential, maintaining a 1,000 foot buffer from freeways and incompatible industrial/warehouse uses, and environmental contamination as constraints to further growth.

- This cycle of RHNA should disperse very-low, low and moderate-income units throughout the region to promote economically diverse communities and diminish existing over-concentrations of poverty.
- The Draft Methodology should explicitly assure that all jurisdictions within the SCAG region share in the responsibility for housing production.
- This cycle of RHNA should take into account economic factors that have adversely affected the ability of local municipalities to produce affordable housing units during the current RHNA cycle including the dissolution of Redevelopment by the State of California (that effectively eliminated significant one-time funding for the production and creation of housing) and the Great Recession. These external economic factors should be taken into consideration at the end of this RHNA cycle to “true up” and/or correct the housing obligations of local municipalities that are proposed to “roll over” into the next RHNA cycle, if at all.
- The Draft RHNA Methodology should incorporate historical economic trends and forecasted economic projections that have a direct impact on the production of housing and that are beyond the control of local municipal government.
- Local municipalities must be provided the means to financially support the production of housing units, which on average results in an increase in the local population at a ratio of 3:1, thereby placing an added demand on core city services on an ongoing and continuous basis. One-time monetary funding must continue to be provided to all communities for subsidizing the acquisition of property and construction, while on-going revenue generated by way of property tax reform must be made available to local municipalities to cover the increased cost of providing core city services for new residents in perpetuity.

**Despite substantial constraints, the Gateway Cities are already addressing housing supply and affordability.**

The Gateway Cities COG developed a Homeless Action Plan in 2011 which has been implemented over the past eight years. In addition, the Gateway Cities COG and its member cities have pursued Cap-and-Trade funding including Affordable Housing & Sustainable Communities (AHSC) funding and other housing related funds, have updated general plans and zoning and most importantly, have facilitated the construction of housing. Our efforts are producing results despite the expansive freeway system, large

industrial/warehousing facilities, high pollution levels generated by truck, rail and shipping traffic, and other physical constraints to housing production faced by our member jurisdictions. Most recently the Gateway Cities COG has allocated substantial staff and financial resources to working with HCD and our member jurisdictions on SB2-related planning and implementation to further increase housing production. We note that unfortunately while RHNA underproductions “roll over” in the preparation of housing elements, past productions and/or overproductions do not, which is unfair to those jurisdictions that have actually produced housing. The Draft Methodology should take into account the total number of housing units produced by local municipalities in past RHNA cycles in order to acknowledge cities that have actually constructed housing units, while simultaneously accounting for those municipalities who have not. While Option 1 does take some small consideration of permit activity, it utilizes an excessively long time period and does not differentiate between affordable and market rate units, multifamily and single-family units. The net effect of this is to discount or ignore the substantial efforts jurisdictions have previously undertaken to facilitate the construction of affordable and market-rate housing.

**The draft methodology fails to acknowledge and consider recent positive initiatives and outcomes.**

Despite the constraints discussed in this correspondence, Gateway Cities COG member jurisdictions have facilitated more than 4,000 housing units during the 5<sup>th</sup> RHNA Cycle, more than 600 of which are restricted very-low-income and low-income units. The Draft Methodology options (Options 2 and 3) provide no credit for that accomplishment. Option 1 focuses on household creation, which tends to be higher in jurisdictions that have created more housing units. Likewise, the Draft Methodology applies a higher ideal vacancy to rental housing units, triggering a need for more units in those jurisdictions that have already recently facilitated rental units. The inclusion of vacancy rate or overcrowding on an individual jurisdiction level is inappropriate as the cause of the housing need and associated vacancy and overcrowding is due to regional factors not fully within an individual jurisdiction’s control. The methodology should be revised to more equitably distribute units regionally, having all jurisdictions contribute their fair share and not over-burdening those jurisdictions that are both facing substantial constraints and having already made significant contributions of units during previous RHNA cycles.

Additionally, Gateway Cities COG member cities facilitated the development of a significant amount of affordable housing units during previous RHNA cycles, with the availability of former redevelopment 20% housing set-aside funds and during better economic times. The total number of housing units built during all previous cycles, including cycles prior to Dissolution and the

Great Recession should be considered, and the final Draft Methodology should take into account the percentage of allocated units completed by each respective jurisdiction during all prior cycles. We note that the Association of Bay Area Governments' (ABAG) methodology contains a similar provision that could be used as the basis for taking into account these factors.

**The draft methodology does not account for constraints found in the Gateway Cities COG region such as residential density, environmental contamination and oil fields, freeways, industrial/warehouse uses, open space and jobs-housing imbalance.**

Density in many Gateway Cities jurisdictions exceeds County, Region and State averages. The fact that our member cities are already denser (See Attachments A and B, see also Attachment C from the SCAG RHNA Final Proposed Methodology, Population Density column) and fully built-out represents a substantial constraint not acknowledged in the Draft Methodology options. Furthermore, many Gateway Cities COG jurisdictions include an overconcentration of freeways, industrial/warehouse land uses, rail corridors and intermodal facilities and other locations where surrounding land area is contaminated and not suitable for housing construction due to potential health risks.

This conflict in goals is particularly acute on contaminated sites previously used for oil and mineral extraction. California Department of Oil, Gas, and Geothermal Resources (DOGGR) and California Department of Real Estate (DRE) regulations discourage the construction of housing on these sites, of which thousands exist in the Gateway Cities COG area. Cities such as Signal Hill and Long Beach have attempted to navigate a pathway to re-use these sites in order to address the substantial need for housing, however these regulations remain a substantial and, on many sites, insurmountable constraint to housing production.

In accordance with the California Environmental Protection Agency/California Air Resources Board's (CARB) 2005 Land Use Handbook, residential development is not recommended to be constructed within five hundred feet (500') of a freeway due to potential health hazards, as living in close proximity to freeways leads to greater adverse health effects beyond those associated with regional air pollution in urban areas. In a document produced by the County of Los Angeles dated March 2019, it was reported that near-roadway pollution exposure had been previously underestimated by CARB and that people residing as far as 1,000 lineal feet from freeways are susceptible to adverse health effects caused by traffic pollution. Further, the City of Los Angeles recently established a 1,000-foot buffer separating freeways from residential land uses in an attempt to minimize pollution exposure to sensitive

receptors. As such, the expansive freeway system in and around the Gateway Cities COG region effectively prohibits the development of sensitive residential land uses within 1,000 lineal feet of freeways, further limiting suitable areas for housing construction due to potential health hazards.

It is also important to note, that it is recommended that sensitive residential land uses also maintain a buffer of 1,000 lineal feet from incompatible land uses such as industrial/warehouse uses due to the greater potential for exposing sensitive receptors to the harmful byproducts associated with industrial/warehouse uses, as exhibited in recent United States Environmental Protection Agency (EPA)/South Coast Air Quality Management District (SCAQMD) cases in the City of Paramount (Carlton Forge Works) and the City of Cerritos (Heraeus Metal Processing). In both cases, the industrial/warehouse uses were located adjacent to and/or in close proximity to sensitive residential and educational land uses, and required extensive intervention from the EPA/SCAQMD to implement measures to mitigate potential harmful byproducts of these uses, including but not limited to, maintaining a physical buffer between sensitive residential land uses and incompatible industrial/warehouse uses in future developments. Due to the significant area of land dedicated to industrial/warehouse uses required to support the needs of the Port of Los Angeles and Port of Long Beach, less land area is suitable and/or available for the construction of sensitive residential land uses in the Gateway Cities COG region than in any other area of the State of California.

Furthermore, due to a resurgence in industrial activity and a repurposing of manufacturing sites into wholesale/distribution uses that accompany the strong activity of the Port of Long Beach and Port of Los Angeles, rezoning industrially classified land for housing would only be a theoretical exercise and is not practical in many Gateway Cities jurisdictions. As an example, Paramount has an above-average percentage of land area zoned for manufacturing. Although some communities with legacies of heavy industry are now left with acres of brownfield properties as the manufacturing base has largely shifted to other countries, Paramount and similar cities are different; Paramount is a built-out city with thriving manufacturing businesses of a range of scales and a vacancy rate that has hovered just below 1% in recent years.

A lack of open space, recreational amenities, quality infrastructure and existing environmental hazards impact the health of existing residents and represent additional constraints for new residential development. The City of Maywood, for example, is one of the densest jurisdictions in Southern California, with over 27,000 residents in a 1.18 square mile area (2010 Census). Less than ten acres of parkland exists for these residents, a fraction of national standards of open-space per capita. Densities in Maywood,

Huntington Park and Cudahy are more than double the County of Los Angeles average and in fact exceed the density in San Francisco (Attachment A).

Cities throughout the Gateway Cities COG region face additional challenges beyond land dedicated to industrial/warehouse uses and density constraints. A majority of Gateway Cities are identified as disadvantaged communities by CalEnviroScreen 3.0 (Attachment D), in many cases 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. In many cities throughout the Gateway Cities COG region, industrial/warehouse uses make-up a large portion of the land area due to the influx of freight/goods movement generated by the Ports of Long Beach and Los Angeles. Displacing existing industrial/warehouse uses, for the purpose of accommodating housing, would displace a significant amount of jobs in the region. The conversion of existing industrial/warehouse uses to residential uses in the Gateway COG region will result in the relocation of industrial/warehouse uses and associated jobs to other parts of Southern California. The relocation of industrial/warehouse uses to underdeveloped and less expensive locations like the Inland Empire, will only result in more freeway congestion and increased air pollution from trucks, and employees having to travel greater distances to employment centers that were once located in the Gateway Cities COG region and displaced by residential development. We note that RHNA methodologies for other Metropolitan Planning Organizations (MPOs), including ABAG, account for employment rather than simply transit and population in determining allocations.

It is inappropriate that the Draft Methodology includes consideration of constraints such as open-space, habitat and wildlife areas, applicable to already lower-density and/or undeveloped suburban locations, whereas the constraints facing the Gateway Cities COG outlined herein that play a more significant role in the health, safety, welfare and lives of our residents are not considered. This shortcoming is unjust and should be addressed in the final Draft Methodology.

**Over concentration of Very Low, Low and Moderate-Income units result in real consequences to cities and sets the region up for failure.**

The Gateway Cities region is home to a full diversity of residents and our member jurisdictions take seriously the need to provide housing to all residents, especially disadvantaged residents. The high levels of poverty in some Gateway Cities jurisdictions, exceeding thirty percent of the population in many census tracts, means that elevated RHNA allocations for lower-income housing could further exacerbate the over-concentration of poverty in specific parts of the region and fail to achieve the statutory RHNA goal of furthering fair housing. Seven of the ten cities with the highest proportion of lower-income persons in Los Angeles County are within the Gateway Cities region, including: Huntington Park, Maywood, Bell, Bell Gardens, Cudahy, Compton, South Gate and Paramount. While the Gateway Cities COG and our member cities are working diligently to improve the livelihood of these residents, those efforts would be diminished by further concentrating additional lower-income units in these same communities.

The RHNA methodology should be revised so that a more-equitable sharing of the allocation of affordable units is spread across the region rather than concentrated in those cities that already include elevated levels of poverty. We are particularly concerned that Option 1 allocates all existing need into affordable income categories, further concentrating such units in existing areas of overconcentration. A higher social equity adjustment than that of which is currently proposed in the Draft Methodology options, or more overt reallocations, could address this issue if they are done at a substantial rate for both existing and projected need.

### **New Housing Paradigm.**

The Gateway Cities COG contends that the manner in which the State of California goes about the facilitation of housing by way of mandating local municipalities to produce housing is ineffective and that further regulations, penalties and the loss of local land use control will continue to produce less than desirable numbers. The housing crisis in the State of California has been brought about by unintended consequences of Proposition 13, which limits the assessment placed on real property to one percent annually despite property values increasing exponentially over time. The cap placed on property tax in turn limits the amount of property tax revenue generated by local municipalities restricting their ability to fund core city services, which continue to increase in cost. To make matters worse, a large majority of cities located in the Gateway Cities COG region are “no low” property tax cities that receive nearly one third of the property tax generated by property tax cities. It is estimated that “no low” property tax cities generate property tax revenue equaling less than five percent of their respective operating budgets, while property tax cities are able to fund over fifteen percent of their respective budgets pursuant to the provisions of Proposition 13.



Due to the lack of financial incentive for both no-low property tax and property tax cities to facilitate the production of housing, cities have been forced to compete with neighboring jurisdictions for sales tax revenue generating commercial uses at the expense of residential development. As a result, local municipalities are conditioned to perceive residential uses as a drain on local revenue sources. Specifically, new residential units result in an increase in population, which in turn places an added demand on local services and programs on an ongoing continuous basis. More importantly, these ongoing costs are not covered by existing one-time funding sources that are intended to assist with the facilitation of residential development by way of subsidizing the cost of property and construction for the financial benefit of a developer.

In order to facilitate the reuse of existing land uses for residential purposes and for the housing crisis in the State of California to subside, local municipalities must be financially incentivized to promote the creation of housing units. Accordingly, the existing housing model employed by the State of California must be discarded to make room for a new housing paradigm, which enables local municipalities to receive their fair share of revenue along with their fair share of housing units. One-time funding sources are insufficient, yet must continue be made available by the State of California to all local municipalities regardless of the financial status of the community for subsidizing the cost of property acquisition and construction. Additionally, long-term revenue provided through property tax reform must be made available to local municipalities for offsetting the added cost of providing required city services and programs to support the influx of new residents in perpetuity.

**The final RHNA methodology should be fair and equitable, it should truly share the need for housing construction throughout the SCAG region.**

The region's housing needs should be addressed equitably by the entire Southern California region. The Gateway Cities COG region has done its part in previous RHNA cycles and is committed to continue to facilitate its fair share of affordable and market-rate housing. We only ask that the RHNA Methodology be adjusted to better achieve its stated goals, facilitating housing construction across the entire region and addressing fair housing while taking into account the economic factors that impact housing production and that are beyond the control of local municipalities.

We thank you again for your consideration of these comments. We would like to channel all communications to Gateway Cities COG staff, Nancy Pfeffer, Executive Director at [nancy@gatewaycog.org](mailto:nancy@gatewaycog.org) or (562) 663-6850.

The Honorable Peggy Huang, Chair, RHNA Subcommittee, Southern California  
Association of Governments  
September 5, 2019  
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Sincerely,



M. Diane DuBois, President  
Gateway Cities Council of Governments

cc: Gateway Cities COG Board of Directors  
Gateway Cities City Managers Steering Committee  
Gateway Cities Planning Directors Committee

**Attachments:**

- Attachment A: Density Among Gateway Cities Jurisdictions
- Attachment B: Map of Density Among Gateway Cities Jurisdictions
- Attachment C: SCAG Region Density (Population per acre), RHNA  
Final Proposed Methodology, Data Appendix A
- Attachment D: Map of Disadvantaged and Low-Income Areas



GATEWAY CITIES

Gateway Cities Ranked by Population Density	
City Name	Population Density per Square Mile <sup>2</sup>
<b>New York <sup>1</sup></b>	<b>27,016</b>
Maywood	23,257
Huntington Park	19,820
Cudahy	19,371
<b>San Francisco <sup>1</sup></b>	<b>17,116</b>
Bell Gardens	17,066
Hawaiian Gardens	15,556
Lynwood	14,599
Bell	13,414
South Gate	12,839
Bellflower	12,393
Paramount	11,223
Norwalk	10,896
Artesia	10,190
Compton	9,604
Long Beach	8,995
Downey	8,894
Lakewood	8,325
<b>Los Angeles <sup>1</sup></b>	<b>8,008</b>
Montebello	7,454
Los Angeles County	7,372
Pico Rivera	7,211
La Mirada	6,183
Whittier	5,866
Cerritos	5,540
Signal Hill	5,039
Santa Fe Springs	2,268
Commerce	2,008
Avalon	1,237
Industry	1,178
Vernon	22

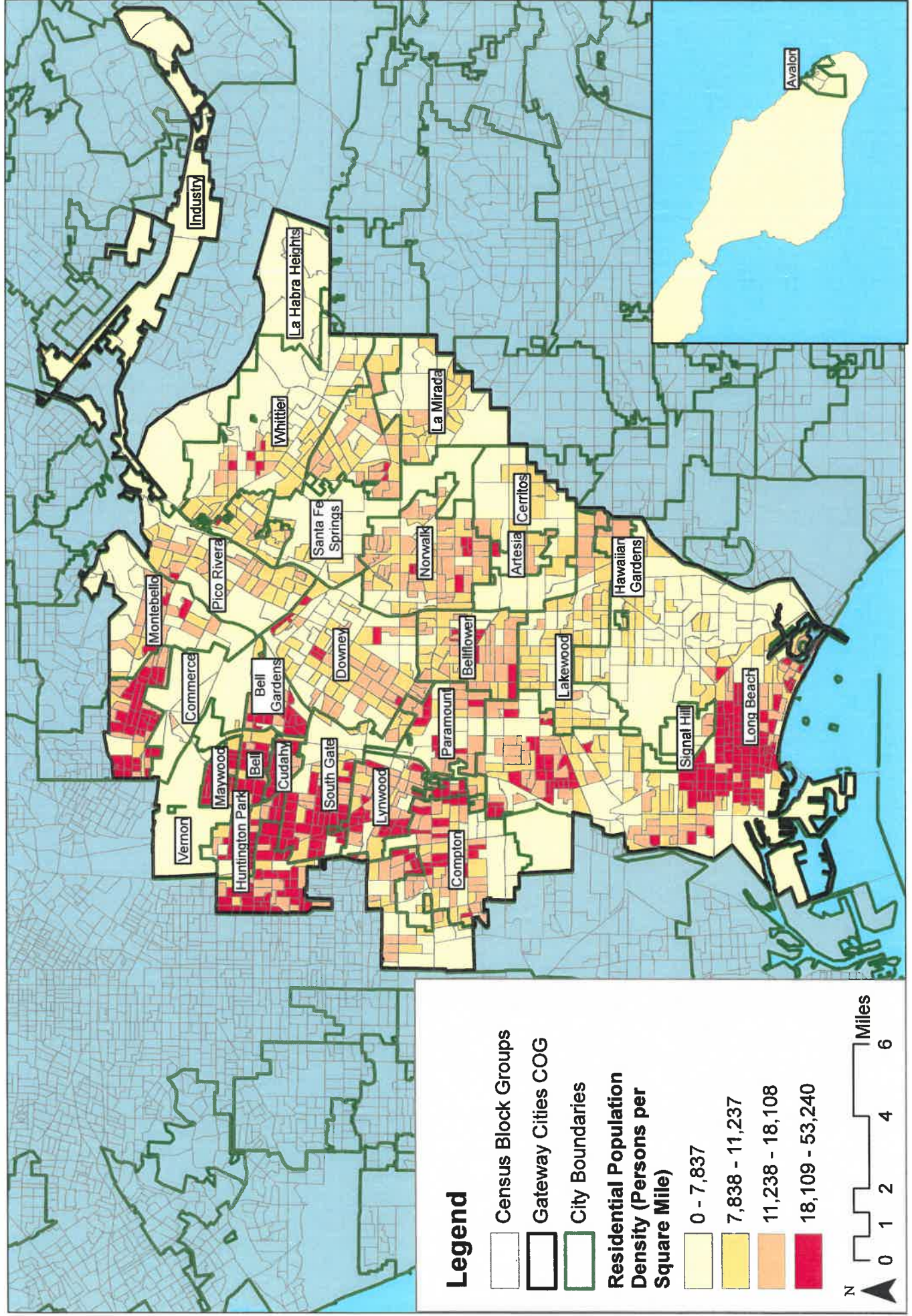
Footnotes:

(1) Cities include for comparison purposes (Population from 2010 Census)

(2) Values obtained from EnergyAtlas (Population from 2010 Census) - EnergyAtlas provides disaggregated energy data developed by the UCLA California Center for Sustainable Communities (CCSC) and funded by the SoCalREN and the County of Los Angeles' Office of Sustainability.

# Population Density Map in the Gateway Cities Council of Governments

Persons per Square Mile



Share of 2019 Population in 2016 HQTAs

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County	Subregion	City	Total Acres*	Population (2019)	Density* (Population per acre)	Share of Regional Population (2019)	Draft 2016 HQTA BY (acre)	Draft 2016 HQTA BY (%)	Population in HQTA	Population in HQTA (%)	Share of Regional Population within HQTA
San Bernardino	SBCTA/SBCOG	Adelanto city	33,804	35,136	1.0	0.2%	-	-	-	-	-
Los Angeles	Las Virgenes Malibu COG	Agoura Hills	5,003	20,842	4.2	0.1%	-	-	-	-	-
Los Angeles	SGVCOG	Alhambra city	4,882	86,931	17.8	0.5%	4,289	87.8%	76,781	90.2%	1.1%
Orange	OCCOG	Aliso Viejo city	4,427	51,372	11.6	0.3%	-	-	-	-	-
Orange	OCCOG	Anaheim city	32,537	359,339	11.0	1.9%	12,794	39.3%	171,998	49.3%	2.5%
San Bernardino	SBCTA/SBCOG	Apple Valley town	47,927	73,464	1.5	0.4%	-	-	-	-	-
Los Angeles	SGVCOG	Arcadia city	7,106	58,891	8.3	0.3%	525	7.4%	4,652	8.0%	0.1%
Los Angeles	GCCOG	Artesia city	1,039	16,919	16.3	0.1%	-	-	-	-	-
Los Angeles	GCCOG	Avalon city	1,845	3,845	2.1	0.0%	-	-	-	-	-
Los Angeles	SGVCOG	Azusa city	6,178	51,313	8.3	0.3%	944	15.3%	9,519	19.4%	0.1%
Los Angeles	SGVCOG	Baldwin Park city	4,335	77,286	17.8	0.4%	2,010	46.4%	31,865	41.6%	0.5%
Riverside	WRCCOG	Banning city	14,822	31,044	2.1	0.2%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Barstow city	26,411	24,150	0.9	0.1%	409	1.6%	643	2.7%	0.0%
Riverside	WRCCOG	Beaumont city	19,173	48,401	2.5	0.3%	-	-	-	-	-
Los Angeles	GCCOG	Bell city	1,676	36,556	21.8	0.2%	1,607	95.9%	35,745	99.5%	0.5%
Los Angeles	GCCOG	Bell Gardens city	1,577	42,972	27.3	0.2%	1,021	64.8%	27,617	64.5%	0.4%
Los Angeles	GCCOG	Bellflower city	3,955	78,308	19.8	0.4%	75	1.9%	1,368	1.8%	0.0%
Los Angeles	WCCOG	Beverly Hills city	3,655	34,627	9.5	0.2%	3,034	83.0%	32,795	95.0%	0.5%
San Bernardino	SBCTA/SBCOG	Big Bear Lake city	4,116	5,461	1.3	0.0%	-	-	-	-	-
Riverside	CVAG	Blythe city	17,437	19,428	1.1	0.1%	-	-	-	-	-
Los Angeles	SGVCOG	Bradbury city	1,255	1,077	0.9	0.0%	-	-	-	-	-
Imperial	ICTC/IVAG	Brawley city	4,902	27,337	5.6	0.1%	-	-	-	-	-
Orange	OCCOG	Brea city	7,816	45,606	5.8	0.2%	-	-	-	-	-
Orange	OCCOG	Buena Park city	6,749	83,384	12.4	0.4%	2,883	42.7%	38,893	46.8%	0.6%
Los Angeles	Arroyo Verdugo	Burbank city	11,109	105,952	9.5	0.6%	6,087	54.8%	75,933	72.5%	1.1%
Los Angeles	Las Virgenes Malibu COG	Calabasas city	8,805	24,239	2.8	0.1%	-	-	-	-	-
Imperial	ICTC/IVAG	Calico city	5,439	42,198	7.8	0.2%	-	-	-	-	-
Riverside	WRCCOG	Calimesa city	9,514	9,159	1.0	0.0%	-	-	-	-	-
Imperial	ICTC/IVAG	Calipatria city	2,391	7,281	3.0	0.0%	-	-	-	-	-
Ventura	VCOG	Camarillo city	12,642	69,880	5.5	0.4%	503	4.0%	3,641	5.4%	0.1%
Riverside	SBCCOG	Canyon Lake city	2,956	11,285	3.8	0.1%	-	-	-	-	-
Los Angeles	CVAG	Carson city	12,115	93,604	7.7	0.5%	920	7.6%	8,334	9.0%	0.1%
Riverside	GCCOG	Cathedral City city	14,574	54,907	3.8	0.3%	-	-	-	-	-
Los Angeles	GCCOG	Cerritos city	5,659	50,711	9.0	0.3%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Chino city	18,939	89,829	4.7	0.5%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Chino Hills city	28,709	84,364	2.9	0.4%	-	-	-	-	-
Los Angeles	SGVCOG	Claremont city	8,614	36,511	4.2	0.2%	907	10.5%	8,726	24.3%	0.1%
Riverside	CVAG	Coachella city	19,138	46,351	2.4	0.2%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Colton city	10,313	54,391	5.3	0.3%	2,507	24.3%	19,331	35.7%	0.3%
Los Angeles	GCCOG	Commerce city	4,192	13,021	3.1	0.1%	2,863	68.3%	10,507	80.8%	0.2%
Los Angeles	GCCOG	Compton city	6,460	98,711	15.3	0.5%	3,039	47.0%	49,754	50.8%	0.7%
Riverside	WRCCOG	Corona city	25,132	188,101	6.7	0.9%	835	3.3%	2,807	1.7%	0.0%
Orange	OCCOG	Costa Mesa city	10,138	115,830	11.4	0.6%	5,427	53.5%	72,110	63.9%	1.0%

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County	Subregion	City	Total Acres*	Population (2019)	Density* (Population per acre)	Share of Regional Population (2019)	Draft 2016 HQTA BY (acre)	Draft 2016 HQTA BY (%)	Population in HQTA	Population in HQTA (%)	Share of Regional Population within HQTA
Los Angeles	SGVCOG	Covina city	4,504	48,876	10.9	0.3%	1,012	22.5%	9,831	20.2%	0.1%
Los Angeles	GCCOG	Cudahy city	785	24,264	30.9	0.1%	722	91.9%	23,070	95.5%	0.3%
Los Angeles	WCCOG	Culver City city	3,285	40,173	12.2	0.2%	2,682	81.6%	32,049	81.3%	0.5%
Orange	OCCOG	Cypress city	4,235	49,833	11.8	0.3%	355	8.4%	2,338	4.8%	0.0%
Orange	OCCOG	Dana Point city	4,164	34,249	8.2	0.2%	-	-	-	-	-
Riverside	CVAG	Desert Hot Springs city	19,461	29,251	1.5	0.2%	-	-	-	-	-
Los Angeles	SGVCOG	Diamond Bar city	9,524	57,495	6.0	0.3%	176	1.9%	391	0.7%	0.0%
Los Angeles	GCCOG	Downey city	8,039	114,212	14.2	0.6%	2,489	31.0%	39,623	35.0%	0.6%
Los Angeles	SGVCOG	Duarte city	4,272	21,952	5.1	0.1%	321	7.5%	2,973	13.6%	0.0%
Riverside	WRCOG	Eastvale city	8,415	66,078	7.9	0.3%	-	-	-	-	-
Imperial	ICTC/IVAG	El Centro city	7,070	46,248	6.5	0.2%	-	-	-	-	-
Los Angeles	SGVCOG	El Monte city	6,150	117,204	19.1	0.6%	-	-	-	-	-
Los Angeles	SBCCOG	El Segundo city	3,483	17,066	4.9	0.1%	3,259	53.0%	62,054	53.5%	0.9%
Ventura	VCOG	Fillmore city	2,111	15,925	7.5	0.1%	1,103	31.7%	2	0.0%	0.0%
San Bernardino	SBCTA/SBCCOG	Fontana city	27,581	212,078	7.7	1.1%	1,887	6.8%	27,065	13.1%	0.4%
Orange	OCCOG	Fountain Valley city	5,798	56,652	9.8	0.3%	769	13.3%	8,726	15.4%	0.1%
Orange	OCCOG	Fullerton city	14,357	142,824	9.9	0.7%	4,098	28.5%	48,476	34.6%	0.7%
Orange	OCCOG	Garden Grove city	11,465	175,155	15.3	0.9%	7,577	66.1%	123,083	70.4%	1.8%
Los Angeles	SBCCOG	Gardena city	3,746	61,042	16.3	0.3%	3,732	99.6%	59,772	99.5%	0.9%
Los Angeles	Arroyo Verdugo	Glendale city	19,565	206,283	10.5	1.1%	3,519	18.0%	91,445	45.8%	1.3%
Los Angeles	SGVCOG	Glendora city	12,564	52,122	4.1	0.3%	169	1.3%	1,767	3.4%	0.0%
San Bernardino	SBCTA/SBCCOG	Grand Terrace city	2,269	12,654	5.6	0.1%	-	-	-	-	-
Los Angeles	GCCOG	Hawaiian Gardens city	611	14,690	24.0	0.1%	-	-	-	-	-
Los Angeles	SBCCOG	Hawthorne city	3,898	87,854	22.5	0.5%	2,613	67.0%	59,721	68.3%	0.9%
Riverside	WRCOG	Hemet city	18,707	84,754	4.5	0.4%	-	-	-	-	-
Los Angeles	SBCCOG	Hermosa Beach city	956	19,847	20.8	0.1%	-	-	-	-	-
San Bernardino	SBCTA/SBCCOG	Hesperia city	46,488	96,362	2.1	0.5%	-	-	-	-	-
Los Angeles	Las Virgenes Malibu COG	Hidden Hills city	1,080	1,885	1.7	0.0%	-	-	-	-	-
San Bernardino	SBCTA/SBCCOG	Highland city	11,948	55,778	4.7	0.3%	153	1.3%	1,421	2.6%	0.0%
Imperial	ICTC/IVAG	Holtville city	736	6,779	9.2	0.0%	-	-	-	-	-
Orange	OCCOG	Huntington Beach city	17,414	203,761	11.7	1.1%	4,198	24.1%	65,431	32.6%	0.9%
Los Angeles	GCCOG	Huntington Park city	1,928	59,350	30.8	0.3%	1,848	95.9%	57,852	98.1%	0.8%
Imperial	ICTC/IVAG	Imperial city	3,736	19,929	5.3	0.1%	-	-	-	-	-
Riverside	CVAG	Indian Wells city	9,328	5,445	0.6	0.0%	-	-	-	-	-
Riverside	CVAG	Indio city	21,254	89,406	4.2	0.5%	-	-	-	-	-
Los Angeles	SGVCOG	Industry city	432	432	0.1	0.0%	636	8.3%	2,087	624.8%	0.0%
Los Angeles	SBCCOG	Inglewood city	5,813	112,549	19.4	0.6%	4,973	85.5%	91,921	82.8%	1.3%
Orange	OCCOG	Irvine city	42,194	280,202	6.6	1.5%	781	1.9%	1,801	0.7%	0.0%
Los Angeles	SGVCOG	Irwindale city	6,162	1,506	0.2	0.0%	560	9.1%	65	4.8%	0.0%
Riverside	WRCOG	Jurupa Valley city	27,931	106,318	3.8	0.6%	503	1.8%	1,969	1.9%	0.0%
Los Angeles	Arroyo Verdugo	La Canada Flintridge city	5,532	20,602	3.7	0.1%	-	-	-	-	-
Orange	OCCOG	La Habra city	4,713	63,542	13.5	0.3%	-	-	-	-	-
Los Angeles	GCCOG	La Habra Heights city	3,939	5,485	1.4	0.0%	-	-	-	-	-

County	Subregion	City	Total Acres*	Population (2019)	Density* (Population per acre)	Share of Regional Population (2019)	Draft 2016 HQTA BY (acre)	Draft 2016 HQTA BY (%)	Population in HQTA	Population in HQTA (%)	Share of Regional Population within HQTA
Los Angeles	SGVCOG	La Mirada city	5,017	49,558	9.9	0.3%	115	2.3%	1,115	2.3%	0.0%
Orange	OCCOG	La Palma city	1,154	15,820	13.7	0.1%	-	-	-	-	-
Los Angeles	GCCOG	La Puente city	2,222	40,795	18.4	0.2%	934	42.0%	17,908	44.3%	0.3%
Riverside	WRCOG	La Quinta city	22,841	42,098	1.8	0.2%	-	-	-	-	-
Los Angeles	North Los Angeles County	La Verne city	5,450	33,201	6.1	0.2%	107	2.0%	1,045	3.2%	0.0%
Orange	OCCOG	Laguna Beach city	5,652	23,368	4.1	0.1%	-	-	-	-	-
Orange	OCCOG	Laguna Hills city	4,252	31,572	7.4	0.2%	-	-	-	-	-
Orange	OCCOG	Laguna Niguel city	9,458	66,748	7.1	0.3%	277	2.9%	1,030	1.6%	0.0%
Orange	OCCOG	Laguna Woods city	2,115	16,518	7.8	0.1%	-	-	-	-	-
Riverside	WRCOG	Lake Elsinore city	27,600	62,949	2.3	0.3%	-	-	-	-	-
Orange	OCCOG	Lake Forest city	10,735	86,346	8.0	0.5%	-	-	-	-	-
Los Angeles	GCCOG	Lakewood city	6,046	81,352	13.5	0.4%	322	5.3%	2,406	3.0%	0.0%
Los Angeles	SGVCOG	Lancaster city	60,446	161,604	2.7	0.8%	503	0.8%	4,586	2.9%	0.1%
Los Angeles	SBCCOG	Lawndale city	1,259	33,436	26.6	0.2%	1,259	100.0%	32,953	99.3%	0.5%
San Bernardino	SBCTA/SBCOG	Loma Linda city	4,839	24,335	5.0	0.1%	1,307	27.0%	10,057	42.0%	0.1%
Los Angeles	SBCCOG	Lomita city	1,228	20,763	16.9	0.1%	413	33.7%	7,138	34.5%	0.1%
Los Angeles	GCCOG	Long Beach city	33,135	475,013	14.3	2.5%	18,962	57.2%	358,947	76.3%	5.2%
Orange	OCCOG	Los Alamitos city	2,617	11,721	4.5	0.1%	-	-	-	-	-
Los Angeles	City of Los Angeles	Los Angeles city	302,810	4,040,079	13.3	21.1%	156,827	51.8%	3,114,706	78.9%	44.9%
Los Angeles	GCCOG	Lynwood city	3,098	71,343	23.0	0.4%	2,355	76.0%	57,174	80.1%	-
Los Angeles	Las Virgenes Malibu COG	Malibu city	12,613	12,046	1.0	0.1%	-	-	-	-	-
Los Angeles	SBCCOG	Manhattan Beach city	2,553	35,922	14.1	0.2%	90	3.5%	421	1.2%	0.0%
Los Angeles	GCCOG	Maywood city	753	27,971	37.1	0.1%	745	98.8%	25,818	93.2%	0.4%
Riverside	WRCOG	Menifee city	29,792	93,452	3.1	0.5%	-	-	-	-	-
Orange	OCCOG	Mission Viejo city	11,519	96,434	8.4	0.5%	226	2.0%	1,161	1.2%	0.0%
Los Angeles	SGVCOG	Monrovia city	8,796	38,529	4.4	0.2%	444	5.0%	5,563	15.0%	0.1%
San Bernardino	SBCTA/SBCOG	Montclair city	3,536	39,563	11.2	0.2%	1,315	37.2%	11,615	30.1%	0.2%
Los Angeles	SGVCOG	Montebello city	5,353	64,247	12.0	0.3%	2,847	53.2%	40,879	64.4%	0.6%
Los Angeles	SGVCOG	Monterey Park city	4,949	61,828	12.5	0.3%	3,001	60.6%	46,022	75.4%	0.7%
Ventura	VCOG	Moorpark city	7,982	37,020	4.6	0.2%	503	6.3%	4,501	12.5%	0.1%
Riverside	WRCOG	Moreno Valley city	32,970	208,297	6.3	1.1%	63	0.2%	265	0.1%	0.0%
Riverside	WRCOG	Murrieta city	21,501	118,125	5.5	0.6%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Needles city	20,182	5,085	0.3	0.0%	-	-	-	-	-
Orange	OCCOG	Newport Beach city	16,508	87,180	5.3	0.5%	994	6.0%	10,204	11.8%	0.1%
Riverside	WRCOG	Norco city	8,948	26,386	2.9	0.1%	-	-	-	-	-
Los Angeles	GCCOG	Norwalk city	6,242	106,744	17.1	0.6%	696	11.1%	9,840	9.2%	0.1%
Ventura	VCOG	Ojai city	2,796	7,769	2.8	0.0%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Ontario city	31,921	178,268	5.6	0.9%	503	1.6%	133	0.1%	0.0%
Orange	OCCOG	Orange city	16,491	141,691	8.6	0.7%	4,815	29.2%	54,768	39.0%	0.8%
Ventura	VCOG	Oxnard city	17,429	209,879	12.0	1.1%	503	2.9%	8,341	4.0%	0.1%
Riverside	CVAG	Palm Desert city	17,245	53,625	3.1	0.3%	-	-	-	-	-
Riverside	CVAG	Palm Springs city	60,437	48,733	0.8	0.3%	-	-	-	-	-
Los Angeles	North Los Angeles County	Palmdale city	67,994	157,854	2.3	0.8%	375	0.6%	1,353	0.9%	0.0%

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Los Angeles	SBCCOG	Palos Verdes Estates city	3,069	13,544	4.4	0.1%	-	-	-	-	-
Los Angeles	GCCOG	Paramount city	3,084	55,497	18.0	0.3%	149	4.8%	3,073	5.6%	0.0%
Los Angeles	SGVCOG	Pasadena city	14,798	146,312	9.9	0.8%	5,366	36.3%	61,930	43.9%	0.9%
Riverside	WRCOG	Perris city	20,269	76,971	3.8	0.4%	1,005	5.0%	3,430	4.6%	0.0%
Los Angeles	GCCOG	Pico Rivera city	5,695	64,033	11.2	0.3%	1,525	26.8%	16,277	26.5%	0.2%
Orange	OCCOG	Placentia city	4,235	52,333	12.4	0.3%	293	6.9%	3,513	6.7%	0.1%
Los Angeles	SGVCOG	Pomona city	14,691	154,310	10.5	0.8%	4,821	32.8%	54,258	35.6%	0.8%
Ventura	VCOG	Port Hueme city	2,913	23,526	8.1	0.1%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Rancho Cucamonga city	25,655	179,412	7.0	0.9%	503	2.0%	1,142	0.7%	0.0%
Riverside	CVAG	Rancho Mirage city	16,065	18,489	1.2	0.1%	-	-	-	-	-
Los Angeles	SBCCOG	Rancho Palos Verdes city	8,656	42,560	4.9	0.2%	-	-	-	-	-
Orange	OCCOG	Rancho Santa Margarita city	8,273	48,960	5.9	0.3%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Redlands city	23,177	71,839	3.1	0.4%	-	-	-	-	-
Los Angeles	SBCCOG	Redondo Beach city	4,006	68,473	17.1	0.4%	662	16.5%	7,037	10.4%	0.1%
San Bernardino	SBCTA/SBCOG	Rialto city	15,427	107,271	7.0	0.6%	2,267	14.7%	28,887	28.1%	0.4%
Riverside	WRCOG	Riverside city	52,126	328,101	6.3	1.7%	1,573	3.0%	11,076	3.4%	0.2%
Los Angeles	SBCCOG	Rolling Hills city	1,913	1,892	1.0	0.0%	-	-	-	-	-
Los Angeles	SBCCOG	Rolling Hills Estates city	2,300	8,247	3.6	0.0%	-	-	-	-	-
Los Angeles	SGVCOG	Rosemead city	3,309	55,087	16.7	0.3%	2,710	81.9%	47,369	86.7%	0.7%
San Bernardino	SBCTA/SBCOG	San Bernardino city	39,914	219,233	5.5	1.1%	14,313	35.9%	116,977	54.3%	1.7%
Ventura	VCOG	San Buenaventura city	14,201	108,170	7.6	0.6%	865	6.1%	4,901	4.4%	0.1%
Orange	OCCOG	San Clemente city	11,737	65,405	5.6	0.3%	275	2.3%	2,234	3.4%	0.0%
Los Angeles	SGVCOG	San Dimas city	9,858	34,584	3.5	0.2%	1,086	11.0%	2,217	6.5%	0.0%
Los Angeles	City of Los Angeles	San Fernando city	1,516	24,918	16.4	0.1%	796	52.5%	13,336	54.3%	0.2%
Los Angeles	SGVCOG	San Gabriel city	2,643	41,178	15.6	0.2%	807	30.5%	15,899	39.4%	0.2%
Riverside	WRCOG	San Jacinto city	16,654	48,878	2.9	0.3%	-	-	-	-	-
Orange	OCCOG	San Juan Capistrano city	9,215	36,821	4.0	0.2%	503	5.5%	3,556	9.9%	0.1%
Los Angeles	SGVCOG	San Marino city	2,408	13,352	5.5	0.1%	134	5.6%	1,034	7.8%	0.0%
Orange	OCCOG	Santa Ana city	17,495	337,716	19.3	1.8%	15,946	91.1%	313,086	93.6%	4.5%
Los Angeles	North Los Angeles County	Santa Clarita city	42,233	218,103	5.2	1.1%	1,508	3.6%	9,862	4.7%	0.1%
Los Angeles	GCCOG	Santa Fe Springs city	5,677	18,261	3.2	0.1%	220	3.9%	196	1.1%	0.0%
Los Angeles	WCCOG	Santa Monica city	5,458	93,593	17.1	0.5%	4,752	87.1%	85,522	92.5%	1.2%
Ventura	VCOG	Santa Paula city	3,654	30,779	8.4	0.2%	-	-	-	-	-
Orange	OCCOG	Seal Beach city	7,475	25,073	3.4	0.1%	-	-	-	-	-
Los Angeles	SGVCOG	Sierra Madre city	1,892	11,135	5.9	0.1%	-	-	-	-	-
Los Angeles	GCCOG	Signal Hill city	1,401	11,795	8.4	0.1%	1,275	91.0%	10,460	90.9%	0.2%
Ventura	VCOG	Simi Valley city	27,051	127,716	4.7	0.7%	479	1.8%	3,011	2.4%	0.0%
Los Angeles	SGVCOG	South El Monte city	1,823	21,293	11.7	0.1%	417	22.9%	6,079	29.4%	0.1%
Los Angeles	GCCOG	South Gate city	4,703	96,777	20.6	0.5%	3,356	71.4%	70,706	74.1%	1.0%
Los Angeles	SGVCOG	South Pasadena city	2,185	26,245	12.0	0.1%	1,459	66.8%	19,073	73.4%	0.3%
Orange	OCCOG	Stanton city	1,986	39,307	19.8	0.2%	1,846	92.9%	31,547	81.6%	0.5%
Riverside	WRCOG	Temecula city	23,785	113,826	4.8	0.6%	-	-	-	-	-
Los Angeles	SGVCOG	Temple City city	2,575	36,583	14.2	0.2%	52	2.0%	379	1.0%	0.0%



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Ventura	VCOG	Thousand Oaks city	35,488	129,557	3.7	0.7%	-	-	-	-	-
Los Angeles	SBCCOG	Torrance city	13,156	148,054	11.3	0.8%	2,559	19.4%	32,303	21.9%	0.5%
Orange	OCCOG	Tustin city	7,123	81,369	11.4	0.4%	2,952	41.4%	42,064	52.6%	0.6%
San Bernardino	SBCTA/SBCOG	Twentynine Palms city	37,609	28,958	0.8	0.2%	-	-	-	-	-
Imperial	Unincorporated	Unincorporated Imperial Count	2,843,170	38,033	0.0	0.2%	-	-	-	-	-
Los Angeles	Unincorporated	Unincorporated Los Angeles C	1,679,677	1,046,858	0.6	5.5%	22,894	1.4%	376,761	35.7%	5.4%
Orange	Unincorporated	Unincorporated Orange Count	176,510	129,128	0.7	0.7%	1,246	0.7%	18,829	14.5%	0.3%
Riverside	Unincorporated	Unincorporated Riverside Cour	4,078,448	394,200	0.1	2.1%	545	0.0%	511	0.1%	0.0%
San Bernardino	Unincorporated	Unincorporated San Bernardin	12,300,111	312,654	0.0	1.6%	1,891	0.0%	15,260	5.1%	0.2%
Ventura	Unincorporated	Unincorporated Ventura Count	1,063,642	96,377	0.1	0.5%	24	0.0%	13	0.0%	0.0%
San Bernardino	SBCTA/SBCOG	Upland city	10,022	78,481	7.8	0.4%	859	8.6%	8,075	10.6%	0.1%
Los Angeles	GCCOG	Vernon city	3,296	301	0.1	0.0%	2,400	72.8%	176	231.6%	0.0%
San Bernardino	SBCTA/SBCOG	Victorville city	47,356	126,543	2.7	0.7%	-	-	-	-	-
Orange	OCCOG	Villa Park city	1,329	5,933	4.5	0.0%	-	-	-	-	-
Los Angeles	SGVCOG	Walnut city	5,744	30,561	5.3	0.2%	2,414	42.0%	9,653	32.1%	0.1%
Los Angeles	SGVCOG	West Covina city	10,282	108,116	10.5	0.6%	4,378	42.6%	48,704	45.2%	0.7%
Los Angeles	WCCOG	West Hollywood city	1,211	36,660	30.3	0.2%	1,211	100.0%	36,211	100.2%	0.5%
Los Angeles	Las Virgenes Malibu COG	Westlake Village city	3,521	8,378	2.4	0.0%	-	-	-	-	-
Orange	OCCOG	Westminster city	6,441	92,610	14.4	0.5%	4,469	69.4%	69,327	75.5%	1.0%
Imperial	ICTC/IVAG	Westmorland city	362	2,461	6.8	0.0%	-	-	-	-	-
Los Angeles	GCCOG	Whittier city	9,379	87,526	9.3	0.5%	-	-	-	-	-
Riverside	WRCCOG	Wildomar city	15,157	36,066	2.4	0.2%	-	-	-	-	-
Orange	OCCOG	Yorba Linda city	12,707	88,706	5.4	0.4%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Yucaipa city	18,069	54,844	3.0	0.3%	-	-	-	-	-
San Bernardino	SBCTA/SBCOG	Yucca Valley town	25,468	22,050	0.0	0.1%	-	-	-	-	-
Regional				19,155,405	8.3		422,115		6,933,859		

Source: California Department of Finance E-5, January 2019; SCAG 2016 RTP/SCS

\*Acre size and density calculation is for total area within jurisdictional boundaries.

# Disadvantaged and Low-Income Communities Eligibility in the Gateway Cities Council of Governments

SB 535 and AB 1550

