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September 11, 2019

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

Re: Regional Housing Needs Assessment (RHNA) Methodology - City of Bell

Dear Honorable Peggy Huang,

The City of Bell appreciates the opportunity to submit this comment letter to the RHNA Subcommittee regarding the appropriate RHNA methodology for the region and all its member jurisdictions. Establish a Baseline RHNA Allocation for All Jurisdictions.

The City of Bell supports a baseline RHNA allocation for all jurisdictions. The baseline allocation could be based on a sliding scale to not overly burden smaller jurisdictions, but also to ensure that every jurisdiction within the SCAG region participates in solving the regional housing crisis. Having a baseline also prevents some well-connected jurisdictions with extensive political clout from unduly influencing the development of the RHNA methodology.

The lack of a baseline for the fifth cycle had resulted in 22 jurisdictions receiving RHNA allocations that are single digits, and another 13 jurisdictions with allocations that are fewer than 50 units. This past RHNA methodology contributed to the large existing unmet needs that we now also have to address based on new State requirements. Consider an Environmental Justice Factor

The City of Bell 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.

For Bell, 22 percent of the City's land has been developed as industrial uses and heavy truck traffic frequents the Florence and Atlantic Avenues, as well as along the 710-Freeway.

CalEnviroScreen indicates much of the City is already exposed to high levels of environmental hazards.

Consider a Social Equity Factor for Existing Housing Need and Projected Housing Need. We understand the County of Los Angeles is in support of the inclusion of a social equity factor of 150 percent for existing needs and extending the factor to projected needs. The City of Long Beach is proposing a minimum social equity factor of 200 percent.

The City of Bell also supports the inclusion of a social equity factor in the proposed methodology for determining existing housing need. However, the City suggests that the Subcommittee consider extending the equity factor to the projected need.

The City of Bell has long been impacted by low income. While 14.3 percent of countywide residents are below the poverty level, 25 percent of residents in the City of Bell are below the poverty level. The City struggles to provide adequate affordable housing and supportive services for the households in need. Minority households are disproportionately impacted by low income. Communities with high minority concentrations are also those with high concentrations of low income households. Bell is 92 percent Hispanic.

Using a jurisdiction's existing income distribution to determine the RHNA income distribution would continue the pattern of low income concentrations. Applying the social equity factor to both the existing and projected needs would help further the important Housing Element goal of affirmatively furthering fair housing - narrowing the disparities in access to opportunities such as employment and quality schools between Racial/Ethnically Concentrated Areas of Poverty (R/ECAPs) and non-R/ECAPs.

Recognize the Existing Density of Local Jurisdictions. Existing population density of the communities should be a consideration with distributing the RHNA. The City of Bell ranks seventh in terms of population density in the Gateway Cities sub region. The City (at 13,414 persons per square mile) is also 82 percent more dense than the countywide average (7,372 persons per square mile). As a densely populated and built-out community, the City has higher burdens on its infrastructure and roads, open space, schools, and other services. Jobs/Housing ratios should also be considered where adding housing in a higher density city with a lower than average job/housing ratio would make the city's job/housing ratio worse and would reduce the developable areas for job producing uses, and likewise the goals of improving job/housing balance to help reduce vehicle miles traveled and to provide economic growth are then harder to accomplish.

Allocate 30% of Existing Need to High-Quality Transit Areas (HQTA)

Unless adjusted, the High-Quality Transit Area (HQTA) factor will exacerbate the overconcentration of low-income households in large jurisdictions and continue patterns of racial and economic segregation.

Bell also concurs with the analysis and comments provided by the City of Long Beach regarding allocating 30 percent of the existing need to HQTAs would exacerbate the current pattern of low income concentrations in minority neighborhoods.

As SCAG staff pointed out, low income households tend to live in HQTAs and higher income households tend to live in non-HQTA areas. The proposed methodology for existing need however applies 30 percent of the RHNA exclusively to HQTAs. Instead of burdening jurisdictions within HQTAs with inflated RHNA allocations - jurisdictions that are largely built-out with higher density populations and face physical constraints to expanding housing production - a more appropriate policy would be to expand transit opportunities in those areas that are not currently well-served by transit.

Phasing Obligations from Existing Needs Over Three Housing Element Cycles

The existing needs component of the RHNA is substantial, as shown in SCAG's estimates. This is a result of decades of under-production, especially in the multi-family housing construction and affordable housing. While it is important to address existing housing needs, as mandated by State law, the City of Bell would like to stress the infeasibility of rectifying this housing shortage over the eight- year Housing Element planning period, in addition to the projected needs component.

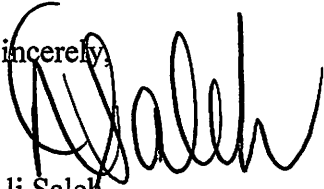
With the new housing bills passed in 2017 and 2018, the RHNA is no longer just a planning goal, but also a production target. As properties identified in the Housing Element sites inventory are developed or redeveloped, jurisdictions must ensure that its sites inventory continues to have the capacity to accommodate its remaining RHNA by income level. As affordable housing almost never materializes without substantial public assistance, jurisdictions - especially those experiencing and fostering housing production - must continue to replenish their sites inventory with properties designated for high density use. This law, coupled with SCAG's proposed methodology of allocating higher RHNAs for jurisdictions with HQTAs, would unfairly penalize jurisdictions that are successful in facilitating Transit-Oriented Development or multi-family housing production in general, while indirectly encouraging or rewarding non-producers.

Requiring local jurisdictions to designate significant amounts of high-density land may also result in backlashes from communities. We urge SCAG and the Subcommittee to work closely with HCD so that the existing need component could be phased over three Housing Element cycles.

The City of Bell appreciates SCAG's efforts on the RHNA process to date and requests that these comments be reflected in the final methodology to be developed and presented to HCD. We look

forward to continuing this cooperative process together. Should you have any questions regarding this matter please contact Susie Gomes at 323-588-6211 extension 2617.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ali Saleh', written in a cursive style.

Ali Saleh
Mayor