Department of Community Development
Planning Division

8650 California Avenue
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October 20, 2020

RHNA Subcommittee

900 Wilshire Blvd., Ste. 1700

Los Angeles, CA 90017

RE: City of South Gate 6th RHNA Cycle Appeal

To Whom It May Concern:

This letter is an official appeal of the allocated RHNA of 8,263 units for the 2021-2029 planning period to the City of South Gate. It is the position of the City of South Gate that the number of units is an inequitable distribution of RHNA and respectfully submits this appeal based *local planning factors and information on affirmatively furthering fair housing (AFFH).*

<u>Inequitable Distribution of RHNA</u>

The City of South Gate has been allocated a RHNA of 8,263 units for the 2021-2029 planning period. This RHNA represents 33.7 percent of the City's 2020 housing inventory, ranking South Gate the top 11th jurisdiction within the SCAG region for the highest proportion of RHNA to existing housing stock. Among the top ten communities with higher proportion of RHNA to existing housing stock, seven are located in the Inland Empire where the availability of land for development may not be an issue. The City of South Gate is located in an urbanized area where future development relies entirely on infill development and recycling of existing uses. It is unimaginable that South Gate would be considered comparable to Inland Empire communities.

South Gate ranks the highest among all Gateway cities in numeric and proportion of its RHNA to existing housing stock. Within the Gateway Cities COG, South Gate represents only 4.5 percent of the subregion's existing housing inventory but is being made responsible for 10.4 percent of the subregion's future growth. In fact, South Gate's RHNA (8,263 units) is close to three times the subregional average (2,942 units).

If South Gate were to have been allocated the subregion's average of RHNA (14.6 percent of existing housing stock), its 6th cycle RHNA would have been 3,586 units. Even if South Gate were just to be even with the next highest RHNA allocation within Gateway Cities COG – Montebello at 25.8 percent – its RHNA

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would have been 6,332 units. Among South Gate and its immediate neighbors (Downey, Huntington Park, Lynwood, Maywood, Bell Gardens, and Bell), the average RHNA allocation represents only 16.3 percent of the existing housing inventory.

A key objective of the RHNA is to expand the supply of housing throughout the region in an equitable manner. This magnitude of discrepancies between South Gate and other Gateway Cities and across the entire SCAG region cannot be deemed equitable. No other community in the Gateway Cities COG receives such a high RHNA.

The City of South Gate contests this allocation and requests a more equitable allocation. The City proposes to at least close the gap between South Gate and Montebello, meeting the next highest proportional allocation halfway for a reduction of 965 units.

Table 1: RHNA versus Existing Housing Stock – Gateway Cities

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Juridiction	County	Total	VL	L	M	AM	2020 HUs	RHNA%
South Gate city	**Los Angeles**	**8,263**	**2,131**	**991**	**1,171**	**3,970**	**24,540**	**33.7%**
Montebello city	Los Angeles	5,174	1,311	705	775	2,383	20,051	25.8%
Industry city	Los Angeles	17	6	4	2	5	68	25.0%
Pico Rivera city	Los Angeles	3,939	1,149	562	572	1,656	17,173	22.9%
Artesia city	Los Angeles	1,067	311	168	128	460	4,731	22.6%
Downey city	Los Angeles	6,510	2,074	944	913	2,579	35,838	18.2%
Norwalk city	Los Angeles	5,022	1,542	757	657	2,066	28,135	17.8%
Santa Fe Springs city	Los Angeles	950	252	159	152	387	5,514	17.2%
Long Beach city	Los Angeles	26,440	7,123	4,038	4,149	11,130	177,783	14.9%
Bellflower city	Los Angeles	3,726	1,012	487	552	1,675	25,097	14.8%
Lakewood city	Los Angeles	3,914	1,293	636	652	1,333	27,598	14.2%
La Mirada city	Los Angeles	1,957	633	341	319	664	15,175	12.9%
Vernon city	Los Angeles	9	5	4	-	-	76	11.8%
Cerritos city	Los Angeles	1,903	678	344	331	550	16,204	11.7%
Whittier city	Los Angeles	3,431	1,022	536	555	1,318	29,721	11.5%
Signal Hill city	Los Angeles	516	160	78	90	188	4,631	11.1%
Huntington Park city	Los Angeles	1,601	263	196	242	900	15,228	10.5%
Lynwood city	Los Angeles	1,555	376	139	235	805	15,341	10.1%
Hawaiian Gardens city	Los Angeles	331	61	44	46	180	3,724	8.9%
Commerce city	Los Angeles	246	55	22	38	131	3,468	7.1%
Cudahy city	Los Angeles	392	80	36	53	223	5,780	6.8%
Maywood city	Los Angeles	363	54	47	55	207	6,768	5.4%
Bell Gardens city	Los Angeles	501	99	29	72	301	10,012	5.0%
Compton city	Los Angeles	1,001	235	121	130	515	24,637	4.1%
Paramount city	Los Angeles	362	91	43	48	180	14,710	2.5%
Bell city	Los Angeles	228	43	23	29	133	9,298	2.5%
Avalon city	Los Angeles	27	8	5	3	11	2,296	1.2%
Gateway Cities		**79,445**					**543,597**	**14.6%**
% of South Gate		**10.4%**					**4.5%**	

Affirmatively Furthering Fair Housing and Redistribution of Residual Need

The concept of affirmatively furthering fair housing involves dispersing lower income housing to high resource areas, avoiding the concentration of minority and poverty. The practices of assigning areas with the federal designation of Racial and Ethnically Concentrated Areas of Poverty (R/ECAPs) and identifying areas with TCAC's Opportunity Mapping require data at the census tract level. However, in SCAG's RHNA methodology for the redistribution of Residual Need (excess growth), the designation of "Disadvantaged" is not applied at the census tract level. Instead, each jurisdiction is either considered "Disadvantaged" or not. As a result, despite the City of South Gate being impacted by similar factors as the "Disadvantaged Communities" in the Gateway Cities COG, South Gate is being burdened for an additional 667 units in existing needs from the redistribution of the residual need.

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The City of South Gate has a minority population of 97 percent. Low and moderate income population represents 42 percent of the residents and 18.8 percent of the population is living below the poverty level. Figure 1 through Figure 4 illustrate that virtually the entire City of South Gate is impacted by high concentrations of low income, poverty, and minority.

Furthermore, a composite index of these factors indicates that South Gate ranks top 8 among the 27 communities in the Gateway Cities COG (see Table 2). In fact, for the 14 "Disadvantaged Communities" in the Gateway Cities COG that receive a RHNA "discount" from Residual Need, seven have lower composite scores than South Gate. Allocating South Gate with the highest RHNA in the Gateway Cities COG further exacerbates the high concentration of disadvantaged population in a single city.

The City of South Gate contests the methodology for designating entire jurisdictions as Disadvantaged Communities and exempting these jurisdictions from addressing the existing needs in the region. South Gate is similarly, if not more, impacted by low income/poverty and minority concentrations, compared to many jurisdictions with the Disadvantaged Community designation. The City requests a reduction of 667 units from the Residual Need.

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Table 2: Composite Index of Low Income/Poverty/Minority Populations – Gateway Cities

City	6th RHNA	% Low/Mod Pop	Total Low/Mod	Non-Hisp White	% Minority	% Living Below Poverty	Combined Index	Disadvantaged Community	Residual	Redistributed
Bell Gardens	501	27%/19%	46%	2.7%	97.3%	29.9%	173.2%	Yes	2,126	0
Cudahy	392	24%/20%	44%	2.8%	97.2%	28.0%	169.2%	Yes	1,409	0
Huntington Park	1,601	20%/18%	38%	1.5%	98.5%	26.1%	162.6%	Yes	3,364	0
Bell	228	22%/21%	43%	5.5%	94.5%	23.9%	161.4%	Yes	2,381	0
Maywood	363	18%/18%	36%	1.3%	98.7%	25.7%	160.4%	Yes	1,791	0
Compton	1,001	19%/20%	39%	1.2%	98.8%	21.9%	159.7%	Yes	4,383	0
Lynwood	1,555	23%/18%	41%	2.4%	97.6%	20.5%	159.1%	Yes	3,824	0
South Gate	**8,263**	**22%/20%**	**42%**	**3.1%**	96.9%	**18.8%**	157.7%	**No**	**-**	**667**
Hawaiian Gardens	331	19%/20%	39%	6.2%	93.8%	23.1%	155.9%	Yes	786	0
Commerce	246	23%/17%	40%	1.2%	98.8%	16.3%	155.1%	Yes	736	0
Paramount	362	20%/20%	40%	4.8%	95.2%	18.7%	153.9%	Yes	2,181	0
Vernon	9	41%/13%	54%	5.6%	94.4%	2.2%	150.6%	Yes	12	0
Montebello	5,174	19%/19%	38%	7.2%	92.8%	13.4%	144.2%	No	-	386
Pico Rivera	3,939	17%/19%	36%	5.4%	94.6%	10.0%	140.6%	No	-	283
Norwalk	5,022	16%/22%	38%	10.4%	89.6%	12.8%	140.4%	No	-	409
Bellflower	3,726	20%/19%	39%	16.4%	83.6%	13.8%	136.4%	No	-	314
Downey	6,510	17%/20%	37%	14.4%	85.6%	9.9%	132.5%	No	-	520
Artesia	1,067	14%/24%	38%	16.8%	83.2%	10.1%	131.3%	No	-	79
Santa Fe Springs	950	12%/17%	29%	12.7%	87.3%	13.3%	129.6%	Yes	187	0
Long Beach	26,440	15%/17%	32%	28.1%	71.9%	18.1%	122.0%	Yes	10,530	0
Industry	17	18%/20%	38%	24.4%	75.6%	5.8%	119.4%	No	-	1
Whittier	3,431	15%/16%	31%	24.7%	75.3%	10.8%	117.1%	No	-	209
Signal Hill	516	16%/14%	30%	28.0%	72.0%	13.5%	115.5%	Yes	508	0
Cerritos	1,903	10%/14%	24%	14.9%	85.1%	4.9%	114.0%	No	-	161
Avalon	27	12%/24%	36%	39.6%	60.4%	16.2%	112.6%	No	-	0
Lakewood	3,914	13%/15%	38%	35.5%	64.5%	6.4%	108.9%	No	-	264
La Mirada	1,957	11%/16%	27%	33.0%	67.0%	6.9%	100.9%	No	-	130

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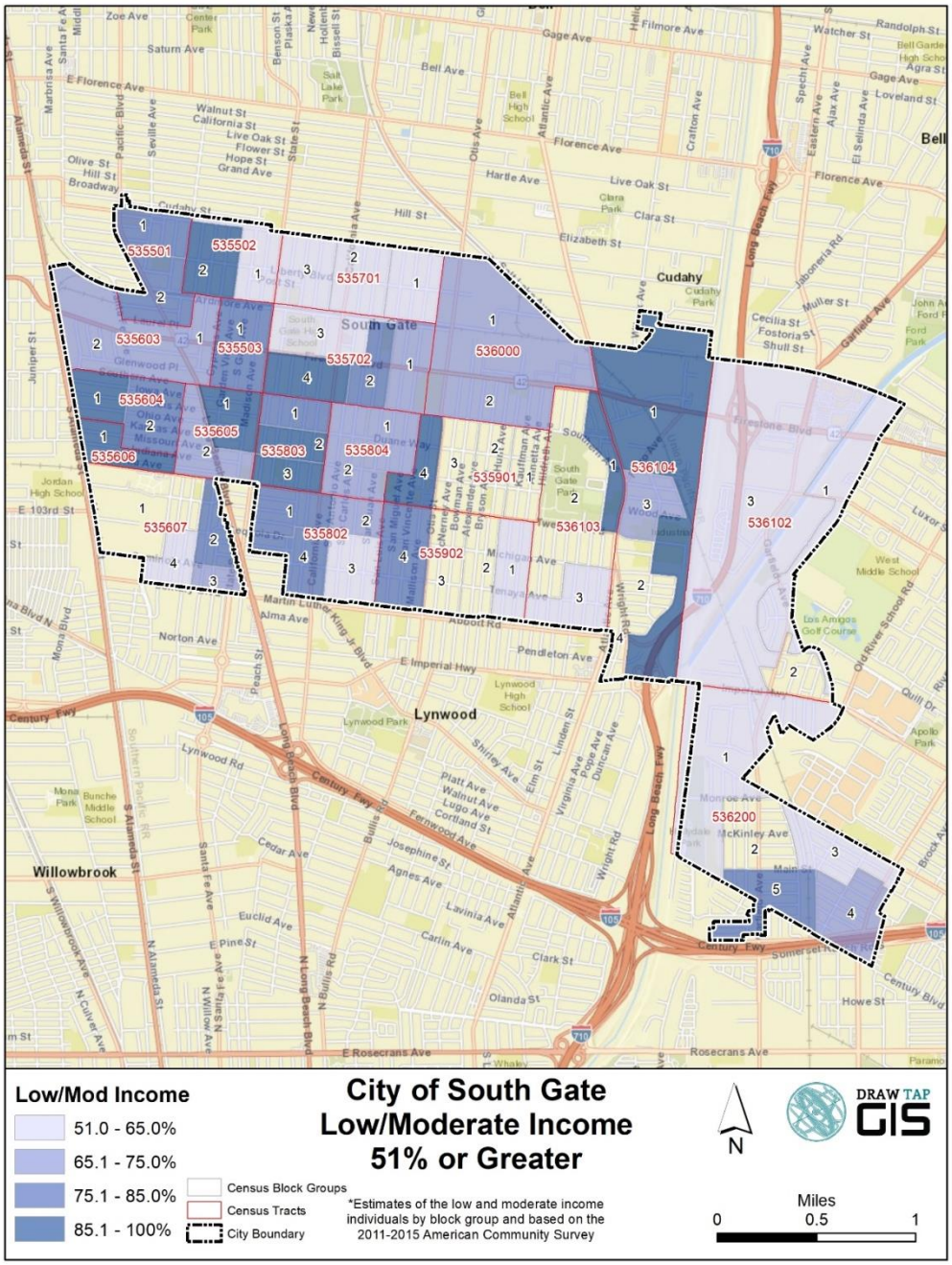
Figure 1: Low Income Concentrations



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Source: HUD Low and Moderate Income Data

Figure 2: Poverty Concentrations

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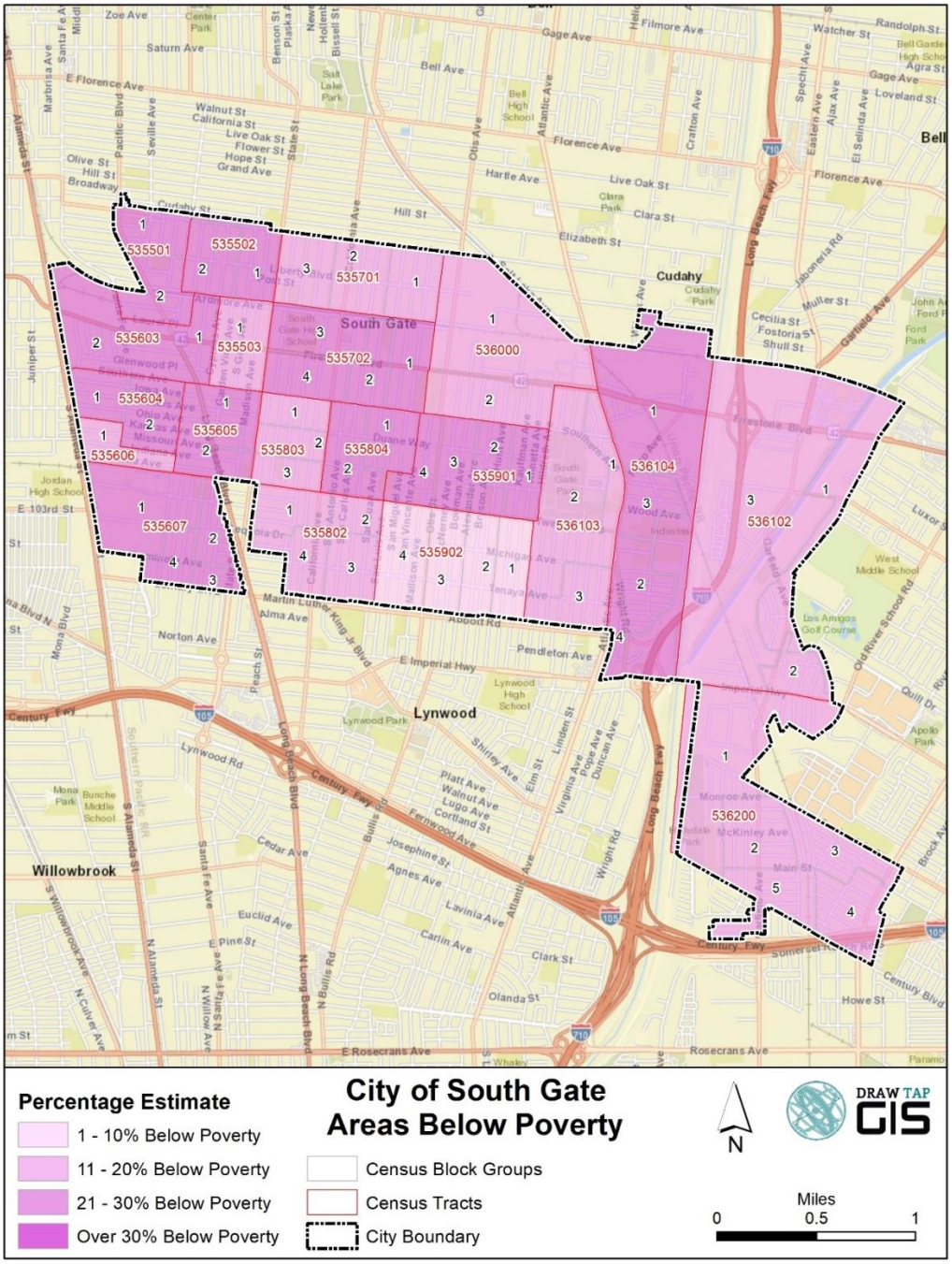

Source: 2014-2018 ACS

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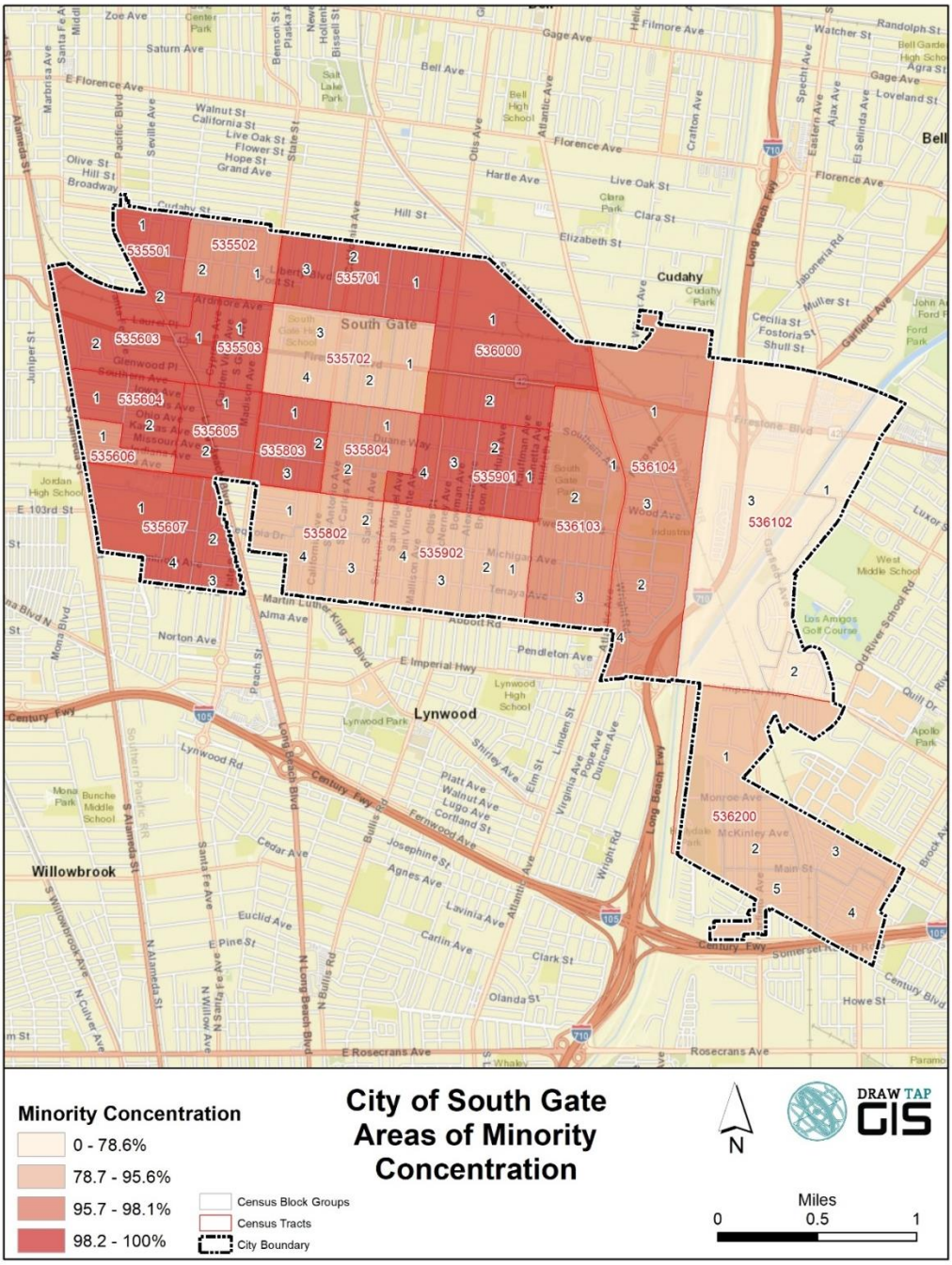
Figure 3: Minority Concentrations



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Source: 2014-2018 ACS

Figure 4: Composite – Low Income/Poverty/Minority Concentrations

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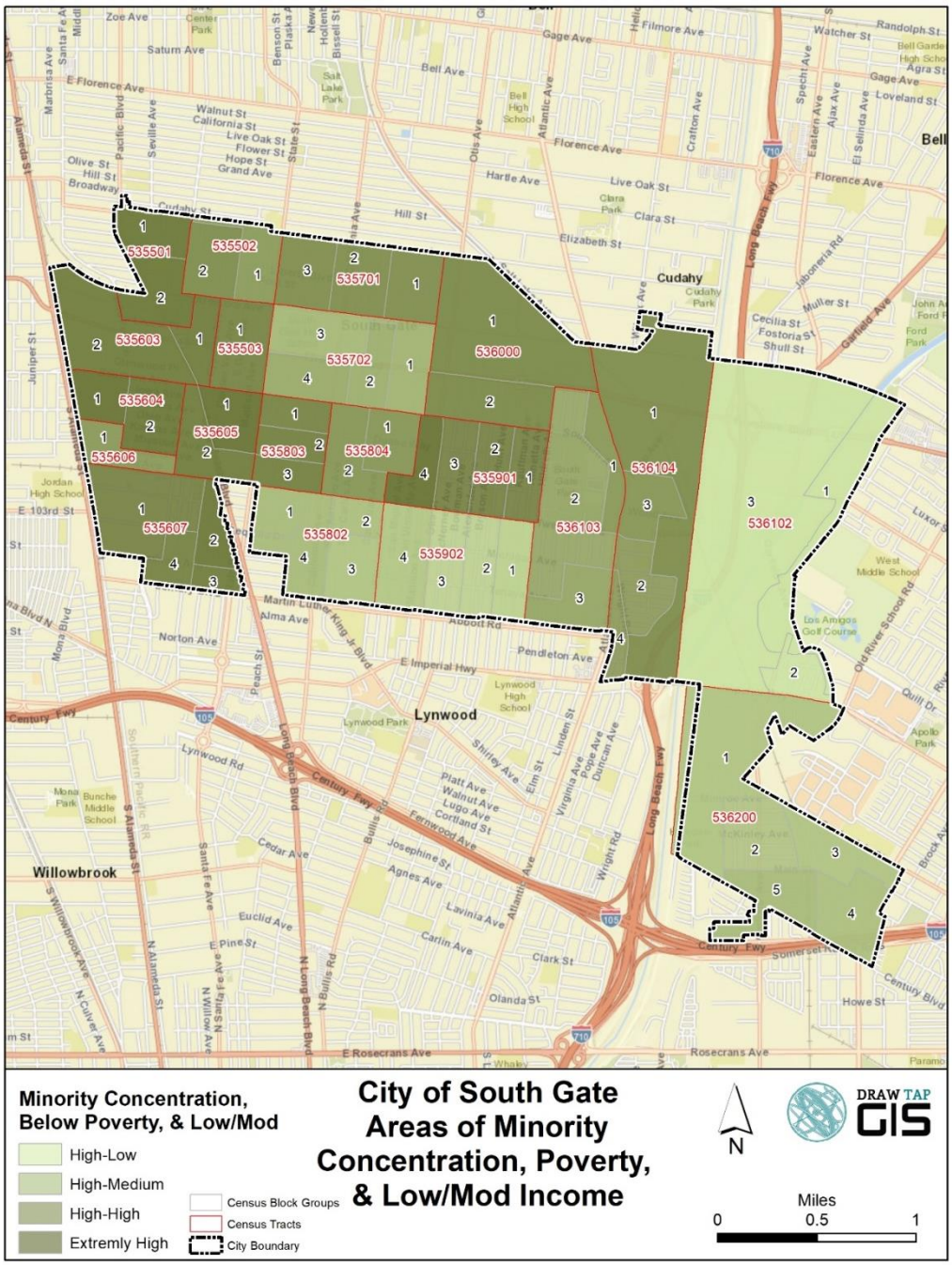

Source: 2014-2018 ACS

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Thank you for receiving and processing the City of South Gate's RHNA 6th Cycle Appeal. Should you have any questions regarding this matter please feel free to contact me at (323)563-9566 or padams@sogate.org.

Sincerely,

Paul L. Adams
Interim Community Development Director
City of South Gate