



# Long Beach Area Coalition for the Homeless

# R-11

COMMENTS IN RESPONSE TO  
DRAFT 2008-2014 HOUSING ELEMENT:  
City of Long Beach, California  
General Plan

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**Coalition Officers:**

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Arlene Mercer Treasurer  
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Kit Wilke- Vice President*

**Organizations:**

California Heights United Methodist Church,  
Catholic Charities  
Children Today  
Christian Outreach In Action,  
City of Long Beach  
Dept. Health and Human Service,  
Housing Services Bureau,  
Disabled Resources Center,  
Downtown Long Beach Associates, Inc.,  
Energy for Others  
First Congregational Church  
Food Finders  
Gumbiner Foundation,  
Long Beach Christ Second Baptist Church  
Long Beach Housing Authority,  
Long Beach Rescue Mission,  
Long Beach/South Bay Substance Abuse  
Coalition,  
Lutheran Social Services  
National Coalition on Alcoholism,  
National Mental Health Assoc of Greater Los  
Angeles (The Village ISA)  
New Image Emergency Shelter,  
Sempra Energy  
South Coast Interfaith Council,  
St. Luke's Episcopal Church  
U.S. Vets of Long Beach  
VA Long Beach Healthcare System  
Voice Int. Ministry,  
Women to Women City of Long Beach

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September 29, 2008

Patricia A. Garrow, Senior Planner  
Advance Planning, Planning Bureau  
Development Services Department  
333 W. Ocean Boulevard, Floor 5  
Long Beach, CA 90802

cc: Long Beach Planning Commission  
Long Beach City Council  
California Department of Housing  
and Community Development

Dear Ms Garrow:

The Long Beach Area Coalition for the Homeless (LBACH) appreciates this opportunity to comment on the Draft 2008-2014 Housing Element. People experiencing homelessness are, by definition, at the *extremely-low income* level, and they comprise a Special Needs Group in the context of the Housing Element. For this reason, individual LBACH members have taken an active part in the public participation aspect of the Housing Element outreach strategy, including the Housing Needs Survey, Housing Element Workshop, Focus Group Interviews, Study Sessions, and LB 2030 General Plan Workshops.

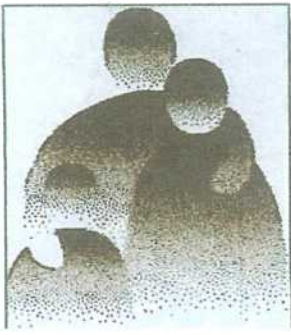
On September 3, 2008, LBACH conducted a facilitated workshop and review of the Housing Element. Some 25 members participated and were tasked to look at "innovative housing solutions" within the Housing Element. These comments are the report of their findings.

Please include these LBACH comments as a part of the Housing Element draft and submittal process.

Respectfully yours,

The Rev. Christopher (Kit) Wilke  
Vice President  
Long Beach Area Coalition for the Homeless

General Meeting: First Wednesday of Every Month at 8:30 AM  
at the Multi-Service Center for the Homeless  
1301 West 12<sup>th</sup> Street, Long Beach CA 90813



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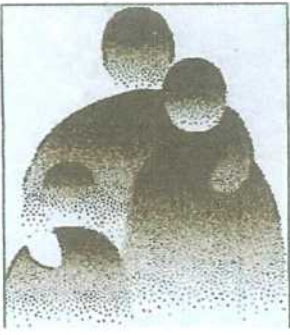
Comments on City of Long Beach, Draft 2008-2014 Housing Element,  
released 8/22/08

From Long Beach Area Coalition for the Homeless, Sept 29, 2008

The Long Beach Area Coalition for the Homeless (LBACH) respectfully submits these comments on the draft of the City of Long Beach's 2008-2014 Housing Element of the General Plan. We share the General Plan principle of increasing public participation (p. V-12) and appreciate the City's stated objective of considering the input of community members regarding their concerns with housing-related issues (p. V-13). The Coalition is eager to assist the City in developing a housing plan that adequately addresses the key issues of (1) creating and preserving accessible, affordable housing; (2) providing public assistance to increase housing affordability; (3) maintaining and upgrading properties and infrastructure; and (4) addressing homelessness and the housing concerns of special needs populations (p. V-13).

## General Recommendations:

1. LBACH encourages the City to consult *Within Our Reach: A Community Partnership to Prevent and End Homelessness, Long Beach's 10-Year Plan Report* **not only** for its recommendations for implementing the Continuum of Care program for homeless persons (as stated in Policy 2.2), but for its many **suggestions for increasing and maintaining the affordable housing stock** to meet the housing needs of a wide variety of low-income and special needs populations. The suggestions in the 10-year plan specifically address the creation of efficiency unit (single-room occupancy) housing for very low income and special needs populations and incentives for increasing mixed income and inclusionary housing development (see sections of the 10-year plan, Housing Goal, Objectives 2 and 5, p. 92-94 and 95-97). Both of these objectives are shared by the Housing Plan (Policy 1.6 p. V-14 and Policy 2.1 p. V-14 and Policy 5.3 p. V-17).
2. LBACH recommends that the City create consistency between the Housing Element and Land Use Element of the General Plan so that the zoning recommendations in the Housing Element are reflected properly in the Land Use Element, especially in regards to zoning that supports adaptive reuse, efficiency unit/SROs, and mixed income projects across the city.
3. LBACH supports the positive emphasis on creating and promoting voluntary incentives for developers to build mixed income and affordable housing. See specific suggestions for strengthening this HE objective below (bullet points 6, 7, 10, 11, 12).
4. LBACH was happy to see supportive housing defined as including onsite or offsite supportive services (p. III-17).
5. LBACH was disappointed to find that no objectives for establishing new programs to expand housing for special needs populations are listed in the objectives for 2008-2014 (p. V-22). It seems that the units mentioned in bullet point 2 refer to the Family Commons currently being



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built at the Villages at Cabrillo by PATH Partnerships. If so, this is not a new program. See specific suggestions below (bullet points 8 and 9).

## Specific Recommended Changes and Additions:

1. The Housing Element (HE) uses both the terms single-room occupancy (SRO) and efficiency units. Please clarify the definitions of these terms and if they are referring to the same type of housing, standardize the use of the term throughout the HE document. LBACH recommends using the term efficiency units (as used on p. V-22) because of the negative connotations of the term "SRO."
2. Make efficiency units/SROs a separate zoning designation instead of Special Group Residence (Program 2.2 p. V-22) for the following reasons: 1) to create flexibility in the use of efficiency units by a wide variety of very low income people; 2) to site efficiency units/SROs in multiple areas of the city, especially to allow for adaptive reuse of existing hotel/motel properties, which may be located outside of the current Special Group Residence zoning areas of R-4, CCN, CCR, and CHW zones; and 3) to set requirements for parking, security, size, and management that are appropriate to the specific location and use of the building rather than constrained by those for Special Group Residences. We view the adaptive reuse of former hotels/motels as efficiency unit/SRO apartment buildings as improving neighborhoods and reducing blight, while expanding transitional and supportive housing throughout the city.
3. Ensure that zoning code changes allow for efficiency unit/SRO housing to be used for transitional and supportive housing and for former hotels/motels to be converted into efficiency unit/SRO housing (p. V-23 and Policy 1.6 p. V-14).
4. Ensure that zoning code changes allow for extremely low income people to be included as a special needs group (p. II-15 and Program 2.2 p. V-22).
5. Please clarify the zoning for special group residences. On page III-13, CHW is not listed in the description of locations zoned for special group residences (top of the page) while Chart 40 on p. III-111 reads that CHW is zoned as such.
6. Change Policy 2.1 (p. V-14) to apply density bonus incentives for housing for all low income residents and special needs groups, not only seniors and disabled.
7. Add to sentence on p. II-49 in section on Density Bonus Projects line 7, "add a bonus for land donation *that is developed for affordable housing*" and not just land for open space or other uses.
8. Remove bullet point 1 from p. V-22. Remodeling of the Multi-Service Center (MSC) should not be part of Housing Element nor should it be listed as a new objective/plan for 2008-2014

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(p. V-22). MSC remodeling is an existing project funded by LA County, not a new project planned for the future. This project should be mentioned in the Continuum of Care section of the HE, but not as a major element of the plan to address housing needs. The project

does not meet the stated goals/objectives of a housing element because there is no housing on the MSC site.

9. Change bullet point 2 on p. V-22 to read “at least 100 **additional** new” units to clarify that this is referring to a new development, not the Family Commons housing currently being built at Village at Cabrillo by Path Partnerships. The Family Commons project should not be listed as a new project planned for 2008-2014.
10. Add to the Housing Plan, under *Goal 5: Mitigate Government Constraints to Housing Investment and Affordability* (p. V-17), a policy of exploring, designing, and implementing more incentive programs for developers to create inclusionary projects. Engage developers directly for their input on programs in which they would participate.
11. Establish a system for evaluating how well the current incentive programs are working. Add this as a 2008-2014 objective for the Development Services Center (p. V-34). For example, we would like to see the Housing Element include a review of how many developers successfully took advantage of the density bonus program in the 2000-2005 planning period and what kind of affordable housing they created (i.e., for seniors, disabled, families, formerly homeless, very low income). The HE states that as of April 2008 378 units of affordable housing were created using the density bonus incentive. In Chart 33 (p. II-45), 334 of these units are listed and all are housing for seniors. Why is the density bonus incentive not attracting other low-income housing developers/developments? How can the density bonus incentive be expanded to meet the needs of other special needs groups and non-special needs groups like the very low, low, and moderate income? How many more developers/development projects did the City need to have taken advantage of density bonuses in order to have met the RHNA targets?
12. Add to the Housing Plan, Section C Housing Programs (p. V-30) as an objective: Create a special office for inclusionary projects to define inclusionary zoning with direct input from developers and to speed up and remove impediments to the process of developing housing projects. This could be added to the 2008-2014 objectives for the Development Services Center (p. V-34).
13. Add a goal to the 2008-2014 Housing Plan (p. V-12): Improve opportunities for public participation from the non-English speaking community. This requires going beyond advertising with multilingual flyers and actually having real-time translation of meeting content including PowerPoint presentations.
14. Change the section on p. I-3 about public participation in the creation of the Housing Element to reflect more closely the public’s experience and perceptions of the meetings. This means going beyond stating how the public was notified and which groups attended the meetings, and



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reflecting on the effectiveness of how they were notified and their satisfaction with venues and mechanisms used to solicit their input. For example, LBACH members who attended the public meeting at Jackie Robinson Academy felt that too much time was spent presenting the PowerPoint presentation and left limited time for public comment. They felt that the location of the meeting was difficult to find and the City should have provided better directions and more/better advertising of the event. Attendees also stated that there was no city staff available at the meeting to translate for Spanish speakers, which contradicted the advertising for the event. In addition, language translation for the Housing Needs Survey failed to capture the views of Spanish-speaking residents because the translation was inadequate and not useable according to bilingual LBACH members.

15. Improve public comment opportunities to address the issues highlighted in bullet point 14 above for 2008-2014 Housing Plan (p. V-12).
16. Add an objective under section 2.5 Universal Design (p. V-24) that reads: Monitor and enforce compliance with codes requiring accessibility for people with disabilities. This should also be reflected as an overall goal for the section on building codes: Ensure that building codes include improving access for disabled people.
17. Include in section 2.2 on zoning (p. V-22) a policy statement (Policy Goal 2 p. V-14) that ensures that the Housing Element will comply with the provisions of CA legislation SB 2 and AB 2634 for all three types of housing: emergency, transitional, and supportive.
18. Change "Relaxed Standards" (p. III-9 and V-36) to "**Flexible** Standards" so as not to imply weakening of standards.
19. Affordable housing covenants should be changed from "at least 30" to "at least **55 years**". This is what the Long Beach Housing Development Company is now using (p. II-47).

### **Typographic errors and omissions:**

1. Pages V-13 and V-14 are missing the numerations of Goal "1" and Goal "2".
2. Page II-50, text mentions Chart 33 in first paragraph and it should read Chart 34.