

**APPENDIX A – 1. HOUSING NEEDS SURVEY SUMMARY
2008-2014 HOUSING ELEMENT**

Housing Needs Survey Summary

2008-2014 Housing Element



City of Long Beach
Department of Development Services
July 21, 2008

Question No. 1: What zip code do you live in?

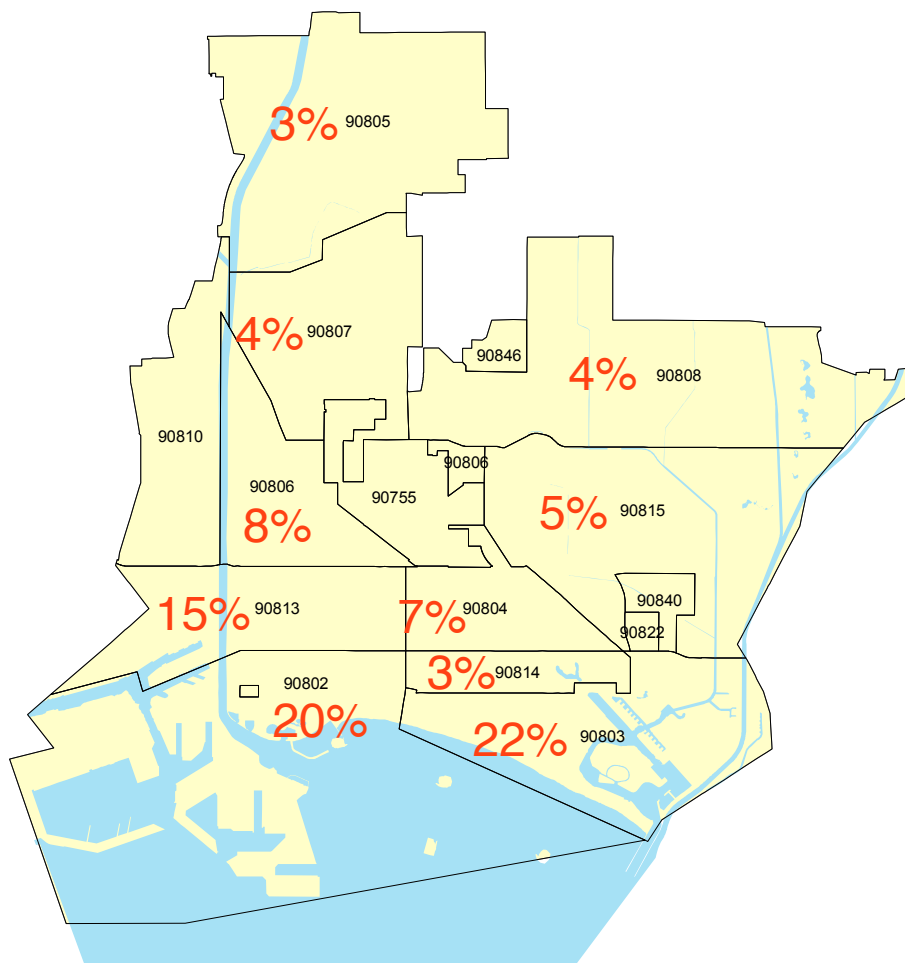


Figure 1

Approximately 375 persons responded to the Housing Survey. Made readily available Citywide, all zip codes showed participation in the survey, however, by far the highest response rates were from zip codes 90803 (22%) and 90802 (20%) located in the southeast and downtown portions of the City. The second highest response rate was from the greater downtown and South Wrigley communities (8% and 7% respectively). The third highest response rate was from zip codes 90806 and 90804 representing more of the Wrigley area, the Poly High School area, the Traffic Circle, and Central Long Beach areas. It should be noted that a preponderance of responses from the 90803 area were from residents of Belmont Shore Mobile Home Estates.

Question No. 2: *Does your neighborhood have a name? If so, please provide.*

Belmont Shores Mobile Estates	Lakewood Village
Downtown	Naples
Wrigley	Rose Park
Belmont Heights	North Long Beach
Belmont Shore	Westside
Bixby Knolls	Willmore District
Los Altos	Bluff Heights
Alamitos Beach	College Park Estates
Alamitos Heights	Hellmen Craftsmen District
Bluff Park	Lakewood Plaza
California Heights	Marina Pacifica
East Village Arts District	Rose Park Historic District
Eastside	Rose Park South
El Dorado Park Estates	Village North
El Dorado Park South	Virginia Country Club

The majority of respondents were able to identify their neighborhood by name. In fact, survey participants represented 30 neighborhoods, from areas all across the City. Neighborhood name recognition is perceived as a positive attribute for neighborhood stability, indicating that many residents feel they have a stake in the future of their neighborhoods and community.

Question No. 3: *What kind of housing unit do you currently live in?*

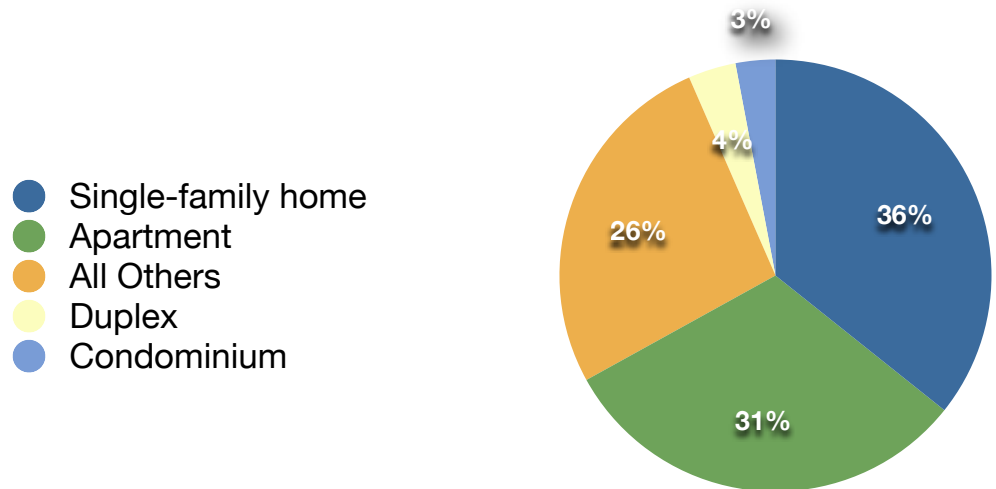


Figure 2

The majority of respondents (36%) live in single-family homes. The second highest response rate (31%) reported living in an apartment. The third highest response rate (26%) reported living in a hotel, motel, mobile home, single room occupancy unit, or were homeless. The majority of those reporting in this group were from the Belmont Shore Mobile Home Estates park.

Question No. 4: *How many Bedrooms does your housing units have?*

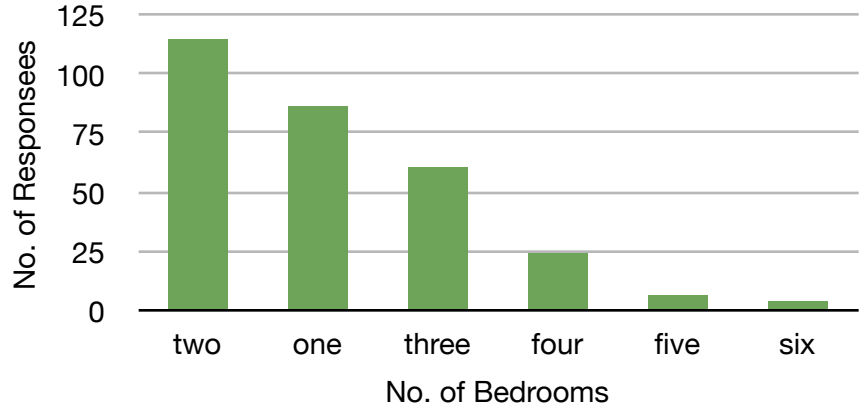


Figure 3

The majority of respondents (38%) live in two bedroom units. The next highest response rates by number of bedrooms in the unit were in this order: one bedroom (29%), three bedroom (15%), four bedroom (8%), five bedroom (2%) and six bedroom(1%). Some did not answer this question or reported homelessness. Overall, 67% of respondents lived in one or two bedroom units.

Question No. 5: *Including yourself, how many people live in your housing unit?*

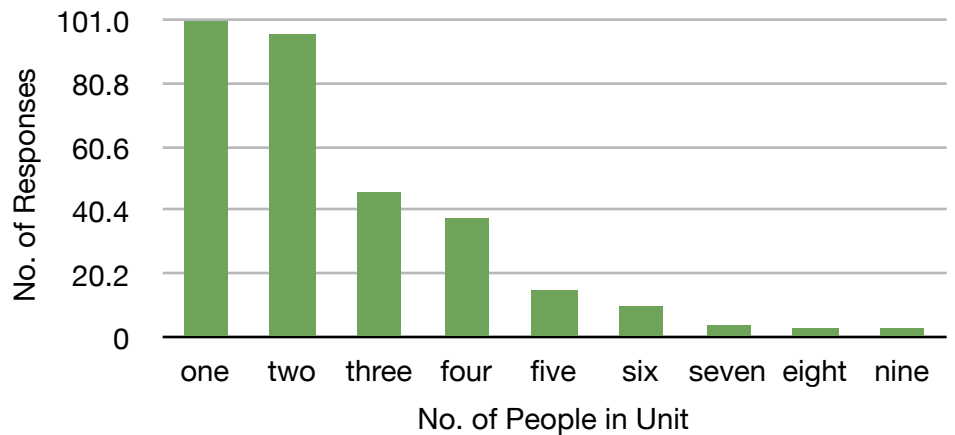


Figure 4

62% of respondents live in small households of one or two people. The majority of respondents (32%) live as singles. A close second, 30% live with one other person. 15% live with two others; 12% live with three others. And, 36 respondents reported living with 4 or more people in their housing unit.

Question No. 6: *Do you own or rent the unit in which you live?*

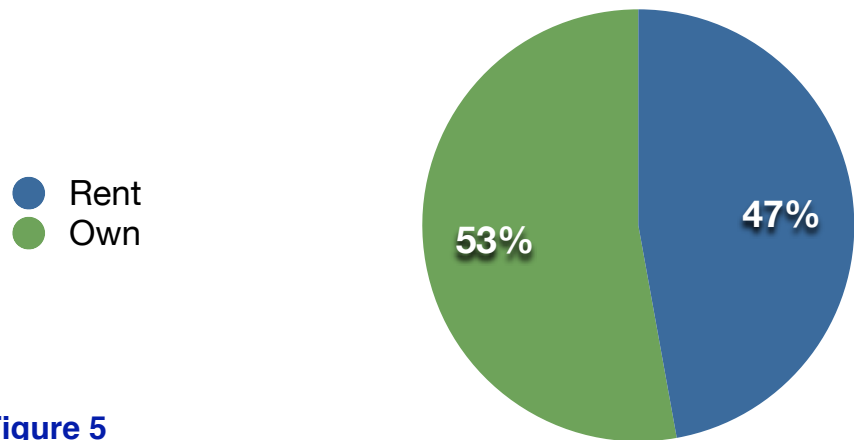


Figure 5

With 53% of respondents reporting that they own their unit and 47% responding that they rent their unit, an fairly even split of owners and renters responded to the survey.

Question No. 7: *Approximately what percent of your household gross monthly income is spent on housing (including rent or mortgage payment, utilities, homeowner fees, taxes and insurance)?*

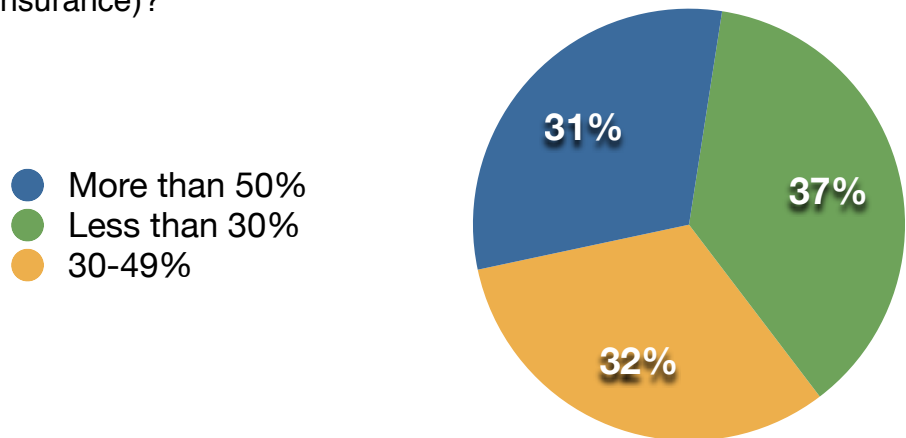


Figure 6

63% of all respondents spend 30% or more of their gross monthly income on their housing costs. 37% of respondents reported spending less than 30% of their gross monthly income on housing; 32% of respondents reported spending 30-49%; and 31% of respondents reported spending more than 50% of gross monthly income on their housing costs. As 30% is the threshold the federal Department of Housing and Urban Development (HUD) uses to calculate affordability, it is apparent that many Long Beach households are experiencing some degree of housing cost burden.

Question No. 8: How satisfied are you with your current residence?

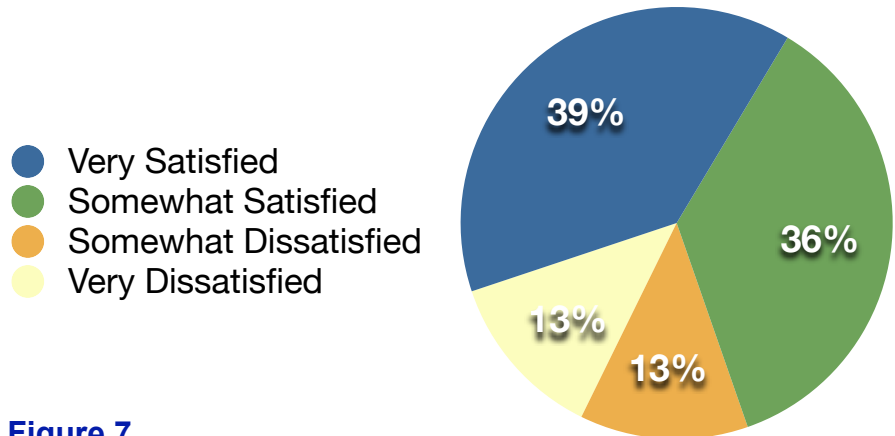


Figure 7.

Three quarters of respondents are satisfied with their current residence. The majority, 39%, are very satisfied. 36% are somewhat satisfied. Only 26% reported being dissatisfied – an even split (13% each) are somewhat dissatisfied and very dissatisfied. Presumably, people continue to live in housing they are not satisfied with because they cannot afford to move to a better unit.

Question No. 9: How satisfied are you with your overall neighborhood?

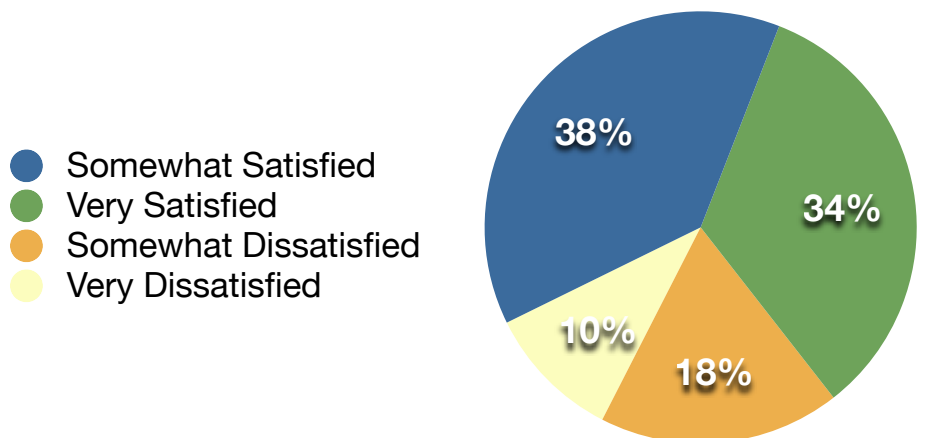


Figure 8.

Similar to reported satisfaction with their current housing unit, nearly three-quarters (72%) of respondents reported being satisfied with their overall neighborhood. 34% of respondents are very satisfied and 38% are somewhat satisfied. 28% reported being dissatisfied, with 18% being somewhat dissatisfied and 10% being very dissatisfied. Presumably, people continue to live in neighborhoods they are not satisfied with because they cannot afford to move to a more desirable neighborhood.

Question No. 10: What are your major issues of concern with regard to your housing and/or neighborhood?

In order of most frequently cited major issues, these are the survey results:

1. Crime and personal safety
2. Rising rents and the high cost of housing
3. Parking impaction (not enough street parking)
4. Property maintenance
5. Street and alley repairs
6. Traffic congestion and traffic safety
7. Graffiti and vandalism
8. Noise: vehicles, air traffic, people and dogs
9. Homeless population
10. Sidewalk repair
11. Trash and litter

Question No. 11: Please indicate your degree of support on a scale from 1 to 5 (1=Most Important, 5=Least Important) for each housing program.

The order of housing program preferences, from the greatest degree of support to least degree of support is:

1. Construction of affordable housing and housing for special needs groups
2. Rehabilitation of housing and neighborhoods
3. Code enforcement
4. New mixed use development along transit corridors
5. Construction of market rate housing
6. New mixed use development in the downtown

2008-2014 Housing Element Update Meeting Jackie Robinson Academy, 2750 Pine Avenue

Summary of Verbal Comments

Affordability

- Need financially accessible housing.
- Gentrification is occurring in the downtown area where newly constructed units are not affordable to current residents. Downtown residents are being pushed out of the City.
- The City's RHNA for very low/extremely low-income households should focus on the extremely low-income category. A 50-50 split between very low and extremely low income housing needs does not represent the City's housing needs.
- Density does not produce affordable housing.
- Need greater density to provide more disabled housing units.

Conditions

- Many apartments are not habitable, with deteriorating conditions and infestation. Landlords are not making repairs in a responsive manner.
- Generally lack of safe neighborhoods.
- Overcrowding is an issue. Apartments are not large enough (not enough bedrooms) for families.

Special Needs

- Housing for persons with special needs is needed.
- Lack of senior housing in the 6th District.
- Long waiting list for senior housing.
- Incorporate the Senior Strategic Plan into the Housing Element.
- Housing is needed for disabled population and extremely low-income households.

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- Independent living for persons with disabilities is needed, not transitional or other institutional housing.
- Lack of affordable and accessible housing for persons with disabilities.
- Promote universal design principles.
- Rising homeless issues in the City.
- Need for larger units with more bedrooms to accommodate large families.
- Need more mental health housing.
- Mentally ill should be housed separate from other disabled persons.

Programs and Policies

- Adopt a comprehensive plan for the Housing Trust Fund.
- Deposit \$26 million to the Housing Trust Fund.
- Adopt an inclusionary, mixed income, housing program.
- Need to provide maximum flexibility in any mandatory affordability ordinances and programs to be successful. Developers should be able to choose from a range of options.
- Adopt a commercial linkage fee program.
- Increase the Redevelopment Housing Set-Aside funds from 20% of the tax increment funds to 30%.
- Establish a community land trust.

Community Participation

- Housing Element process should provide more opportunities for community participation.
- One public meeting before the drafting of the plan is not adequate given the size of the City and the extensive issues confronting the City.
- Need to conduct stakeholder meetings and focused group discussions.

Other Comments

- 60% of residents work outside of the City – therefore housing should be built elsewhere outside the City.
- City staff needs to take leadership and advocate for more affordable housing.

Written Comment Cards

1. As a mother who rents an apartment I see that the size of newer housing developments are too modest in size. My family is large.
2. Give renters some rights, instead of owners. We need rent control, over all.
3. I would like information on how to apply for affordable housing in the City of Long Beach. I'm on Section 8 right now, but I would like to get affordable housing. I'm in the process of moving now because they are turning my apartment into a condo.
4. Construct a single seniors affordable, gated, housing development in the 6th District in the 100 block of East Hill Street. Include a seniors center and Laundromat. Include a green space where seniors can feel safe.
5. My name is Robert Esquivel. I am on SSI and I cannot afford high price apartments. I don't have enough money to pay for my rent, food and other things I need for living. It would be reasonable to have affordable housing.
6. The City of LB needs to create a Housing Trust Fund worth at least \$26 million. The City also needs to implement mixed income ordinance. This meeting seems counterproductive because it does not allow much time for public comment, as was stated in the flyer. [All persons wishing to speak were heard. No time limits were imposed.]
7. Establish a required, mixed-income ordinance. Build meaningful financing of Housing Trust Fund. On your questionnaire, ask homeowners when they first bought their home.
8. There are motels that are considered blight by crime definition. When RDA buys them they could be converted to senior housing with little change. We were kicking this around at CPAC Executive meeting one night when this was presented as two separate problems.
9. It was a great meeting but you should have more meetings and at different times so you can get more people's input. I think this is a great service and you should do more. We need more low-income housing for disabled people.

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10. Lack of emergency shelter for disabled needs to be addressed as well as the need for permanent housing for low, extremely low disabled. Hold more community meetings so more persons can attend.
11. I'm concerned on what appears to be late start on Element plan for submittal in June. When and where will the focus meetings be scheduled for comprehensive input from the community? Organizations need to be advised.
12. Our Council needs to be educated on the reality of the low-income status of a large portion of our population and the housing needs of these families.
13. Not enough public meetings to obtain Long Beach residents' input to understand the need of affordable housing.
14. The City needs to build more housing for extremely low, very low and low-income households. LB should adopt: 1) A \$26 million housing trust fund, 2) A mixed income-housing ordinance, 3) A commercial linkage fee, 4) A condominium conversion fee, 5) Increased redevelopment housing set aside, and 6) Community land trusts.
15. If 60% of people work outside Long Beach and most new LB jobs like Douglas Park will be higher tech and incomes – shouldn't RHNA be adjusted for LB and more for areas where there are lower income jobs? Everyone wants to live in a beach city and mostly moderate and higher incomes will be only ones able to live in LB.
16. Please contact me regarding the needs (number of persons) for emergency shelter and how those numbers were calculated (related to SB2). The special needs breakout group leader only fielded questions on homeless services. This part of public participation has been inadequate.
17. Before Housing Element plan goes to the State we need focus groups to give input from all socio-economic groups.
18. Important to remember that Housing Element needs to be consistent with Zoning Ordinance.
19. We would like to see an open microphone that would allow minorities to speak. [Interpreters and an open mike were available. All persons were given the opportunity to speak.] There should be more meetings regarding housing throughout the city. The meetings should vary and the city should include questions that deal with housing need in the large scale of things because the city is a large city with large housing needs.
20. Seniors [at Belmont Shores Mobile Estates] are being forced to give up their mobile homes because space rent, utilities, security gate keep going up. We need some kind of rent control on housing for seniors so it remains affordable – many of us are in our

70's and 80's.

Other Written Comments

My name is Hasina Shade and I consider Long Beach my home. I've lived here for 10 years. I've heard all these negative things about Long Beach and I don't believe any of them. This city is where my heart is. Where my healing began and where I got my second chance at living again.

It may never have happened though if the place I moved into was not affordable. But it was. I moved in with GR, then my SSI came through and things slowly started to get better. I was in a stable apartment, not homeless or couch surfing any more.

That stability was the foundation I built my wellness on and I haven't lost it since. No matter what happens I always knew I would have an affordable place to live. Since then I got Section 8, making my situation good enough to go back to school. But now, if someone were under the exact same circumstances that I began with would never be able to live here and get a chance to start over.

It frightens and saddens me to think that someone like me now would fall through the cracks and be lost forever, for good. Please consider this when you think about the cost of living and wanting to raise it.

Elina Green, Project Manager Long Beach Alliance for Children with Asthma.

We have worked with over 700 families in Long Beach in our Community Health Worker program, a program where Community Health Workers enroll families over the course of 1 year to teach about asthma and how to decrease indoor allergens (mold, cockroaches, pests, dust) in a non-toxic/healthy manner.

We tried to get some of our participants out tonight but they could not come because of difficulties with transport to this location, so I am going to present the top issues identified by some of our community members in a recent meeting...

Top Housing Issues Identified by our moms:

- 1) Financially accessible apartments
- 2) Habitable apartments with more space for families—many of the apartments convert the living room or closets into bedrooms
- 3) More habitable apartments (without **mold** and **“animals”**—cockroaches, rats, termites, cats & dogs) and/or apartments in better condition initially!
- 4) Apartments where landlords make the repairs to them, quickly and/or that the landlord

puts emphasis on making the spaces better rather than letting them go.

5) Safe neighborhoods.

From a policy perspective, LBACA believes that what we need is to have a fully funded Housing Trust Fund to begin building the affordable housing developments the city needs for the lowest income residents living in Long Beach. As part of that, to encourage balanced development of the city, an Inclusionary Zoning Ordinance will help us provide for the people living in Long Beach and not gentrify aspects of the city, pushing lower income people out of parts of the city, which causes neighborhood destabilization and in the cases of many of our families, requires families to have their children change schools.

Furthermore, it is worth noting that I only found out about this meeting because of our participation in the *Housing Long Beach* coalition. We are on many of the city's regular list serves and notices and I didn't receive notice from the city—I received notice from local advocates, whom I understand were asking for the information about this meeting.

If the city truly wants to have meaningful participation on these issues, these meetings have to be set up for more than one evening in more than one part of the city.

February 27, 2008 Housing Element Community Meeting

- I. My name is Susanne Browne and I am a housing attorney with the Legal Aid Foundation of Los Angeles. I am here tonight on behalf of our client, Housing Long Beach.
- II. Housing LB is concerned about the lack of public participation regarding the City's Housing Element. While surrounding jurisdictions have been conducting outreach since last summer, this is the first and only public meeting planned before the drafting of Long Beach's Housing Element.
- III. Housing element law requires the city to make a diligent effort to obtain public participation from all economic segments of the community.
 - A. One community meeting does not meet this requirement.
 - B. The City should be conducting meetings throughout the City and at various times of day.
- IV. New Housing Element Law requires the City to quantify the housing needs of its extremely low-income residents. The City can either assume that 50% of its very low-income RHNA should be targeted to extremely low-income households or it can come up with its own methodology.

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- V. Based upon extensive research by a UCI Graduate Planning student, the City should not assume that 50% of its very low-income RHNA is for extremely low-income households because this would not accurately reflect the high number of extremely low-income households in the City.
- VI. The City has been assigned a very low income RHNA of 2,321 units. Based upon the number of very low-income and extremely low-income households in the City.
 - A. 1,342 of these units should be allocated for extremely low-income households; and
 - B. 979 units should be allocated for very low-income households.
- VII. Last year, in its Housing Element Annual Report, the City reported that it was far behind in meeting its affordable housing production needs. For the 2000-2006 planning period, the city reported that it produced only:
 - A. 29% of very low-income units needed;
 - B. 17% of low-income units;
 - C. 20% of moderate-income units; and
 - D. 837% of market rate units.
- VIII. Based upon these housing production numbers, the city should adopt policies to encourage the production of affordable housing.
 - A. First, the City should adopt a comprehensive funding plan for the housing trust fund in the amount of at least \$26 million.
 - B. Second, the City should adopt a mixed-income housing ordinance, requiring developers of new housing to set aside a percent of units as affordable.
 - C. Third, the city should adopt a commercial linkage fee.
 - D. Fourth, the city should adopt a condominium conversion fee.
 - E. Fifth, the City should increase its redevelopment affordable housing set aside from the minimum of 20% to 30%.
 - F. Finally, the City should create community land trusts to create permanent affordable housing for its residents.
- IX. Thank you.

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Kelly Puente, Press Telegram

Feb. 14th, 2008 Phone Interview

Thank you for calling back. I am a senior, 78 years old, and a director for Belmont Shores Mobile Estates Homeowners Association. I am also a recently retired licensed clinical social worker.

We are a community of 80 seniors, many in their 70's and 80's, most of which are living on fixed incomes. There are 347 homes in this park. Most of us moved into the mobile home park thinking that in retirement this would remain an affordable place to live, especially if we owned our own mobile home. I have been in the Park for over 5 years and each year there is a significant rental space increase, exceeding the Consumer Price Index. More and more, these increases are forcing seniors to sell their homes because of the continuing elevation of the space rentals, and other fees.

Early in January I wrote a letter to the editor regarding blatant gouging of seniors at Belmont Shores Mobile Estates. Park residents own their own homes, and we rent space from Management who provide us with utilities, trash collection for which we are charged. Mgmt. is responsible to keep Park in good working order, which includes good functioning of sewer system, roads, leveling homes, maintaining common areas.

What triggered my letter was a recent notice from Management of this Park that as of April 1st we should expect both a \$30.00 month increase in space rent, and in addition to that our trash fee was being increased from \$1.00 per month to \$20.48 per month. On the issue of the increase in trash collection, we consulted our attorneys and were told that they could charge only their costs for utilities. We advised Management at a Representation Meeting between Management and Board of HOA that we would seek an injunction in the courts to stop the trash increase of \$20.48 because that exceeded their costs. Management yesterday notified residents that they changed their minds after talking to their attorneys and that the charge for trash would be \$9.41 which is monthly amount charged per home.

This area in which we are located off Loynes Drive near Pacific Coast Highway is zoned for Mobile Home Park, golf course, etc. because we are located above a landfill. This was a dumping ground, and there is a significant amount of methane under the ground. This site was a landfill from 1949-1960, and in '62 the mobile home park was constructed directly on top of the landfill site. There are serious drainage problems, subsidence and methane issues.

In June of 2007, California Integrated Waste Management Board. SWIS#19-AK-5003 prepared a report to determine potential for onsite methane occurrences in Belmont Shores Mobile Home Park.

The results from gas surveys show high levels of methane gas in all locations where probes were installed. Some areas of park gas as high as 79% v/v, average concentration 51% v/v.

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In the report the California Integrated Waste Management Board state they can offer no assurances and assume no responsibility for site conditions outside of the scope of their assessment of eight selected structures. This gas monitoring system was installed and monitored for one year.

The report also recommended compliance of State minimum standards at site to provide for protection of public health and safety and the environment. They recommended that any new mobile home owner should be made aware of these conditions.

Most of the seniors moving here with the intention of remaining here for the remainder of their lives. As part of the requirement for getting Federal Funds under the Area Agency for Aging, the City must have senior housing resources and this park is an important source of senior housing with 347 sites for homes in our community. It is critical that this senior housing be kept affordable.

[Signed] Bernice L. Hogan
6251 E. Golden Sands Dr.
Long Beach, CA 90803

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2008-2014 Housing Element Update Meeting City Hall, 333 West Ocean Boulevard

Service Providers

Participants: First Congregational Church; Homeless Coalition; Legal Aid; Disabled Resources; Community Development Corp.; Villages at Cabrillo; Senior Housing; Long Beach Rescue Mission; and Centro Shalom.

Overall Feedback

- Need to preserve affordable housing – even some nonprofit organizations are selling their affordable housing stock.
- Many new units built are probably used as second homes.
- Housing costs in LB are causing decline in school enrollment – now declining enrollment in high schools – because families cannot afford to live in City.
 - Downtown lofts do not attract families.
 - While the school district is not closing schools, they are bussing the students around.
- Substandard apartments are still not affordable to service employees – many live in the Village area and walk or bike to work.
- City has a hidden homeless population – homeless workers not living on the street but are “couch surfers.”
- Housing Action Plan – inconsistent with or not coordinated with objectives in plans by other departments
- This update of the Housing Element is an opportunity for the City to de-politicize affordable housing. The Council needs to make allowing special needs housing a blind process.
- Special needs, transitional, supportive and affordable housing development should be accommodated citywide, dispersed across all council districts.
- The City needs to remove some barriers to make development deals work for special needs housing developers.

Special Needs Housing

- Extensive needs for senior housing.
- Long Beach needs to respond to the new State laws in order to not create barriers to social service and supportive housing providers.
 - People coming out of homelessness can't go into permanent housing due to lack of credit – potential solution is to allow these people access City programs without the credit checks.
 - Zoning code has restrictions on providing social services, and therefore limiting the ability of nonprofit to find appropriate locations for supportive housing.
 - Should consider categorizing social services for homeless/low income persons as “professional” services to bypass the zoning restrictions.
- The Element needs to address transitional housing needs.
- The Council needs to allow transitional housing in all districts – citywide.

Special Needs & Nonprofit Housing Development

- The City needs to help nonprofit developers with land assembly, gap financing and rezoning of properties.
 - Small building sites – development standards are too restrictive to do affordable infill housing.
 - Ideal size is 40 to 75 units.
 - Needs City assistance in assembling sites and address zoning issues. The process for a zone change can be costly and uncertain. In addition to assisting in acquiring/assembling the parcels, City can help reduce costs/uncertainty if the rezoning is initiated by the City.
 - Gap financing from City is also needed, particularly for single households (even tax credit projects are not affordable to single households)
- Zoning and building code obstacles to redeveloping sites for special needs housing include: CHW (Commercial Highway) zone does not allow residential uses, narrow lots are a problem, and our zoning code disallows SROs.
- The City should get non-profit participation in for-profit developments.
- The City should adopt a mixed-income housing ordinance that does not constrain the overall development of housing
- What happened with the Muni-Financial study on the jobs/housing linkage fee?

APPENDIX A – 3. May 16, 2008 Focus Group Meetings

- NIMBYISM attitude is a problem with regard to density & development standards. For example, with Single Room Occupancy (SRO) units – the City makes it difficult to put the pieces together to make developments work – like with the motels we could be using for this purpose.
- HAP (Housing Action Plan). There seems to be a lack of support for the HAP on behalf of the neighborhood organizations where these areas are located. Neighborhoods are not on board with this plan.
- HAP program is a part of the problem in that it ignores other areas and focuses too much on rehab and not on producing new units. Substantial rehabs are reconfigured to larger units – not adding to the housing stock.

Development Standards

- Parking – need to look at parking differently, such as allowing tandem parking, lifts, shared parking, reduced parking along transit lines (25% of population along Anaheim corridor does not own a car).
- Work space at home to encourage working from home.
- Reduce minimum unit size.
- Increase density and height limit especially in downtown area – important to use good design to make density acceptable.

Mixed Income/Inclusionary Housing

- Inclusionary housing component could help meet affordable housing targets. When will the City have something on the MuniFinancial report discussing a jobs/housing development impact linkage fee?
- MuniFinancial report should be discussed prior to the Housing Element discussion for coordination purposes.

Technical Requests

- Legal Aid is asking for a 30 day review of the Draft Housing Element before it goes to Planning Commission.
- They also want the City to calculate the “extremely low income population” to be indexed based on household size and income level, thus deriving a number higher than the State allowed 50% of very low income population.

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- RHF at 911 Studebaker, a seniors housing developer, would like to receive any RFPs from the City.

LB Unified School District

- Stated that many teachers live locally. Planned school constructions are on hold as there is a bubble of middle school and high school students right now and the elementary schools are experiencing declining enrollments.

Downtown Long Beach Associates (DLBA)

- Employees in service level jobs are walking and biking to work, living in illegal units. We need workforce housing near our employment centers.
- Downtown retail needs more population to make it work. Retail employees need affordable housing.
- Seniors downtown are paying so much for housing they are relying on feeding programs to make it through the month.
- We need more daycare services downtown.

Memorial Medical Center & Miller Children's Hospital

- Hospital employees – whole spectrum of employee/salary range – 5,400 employees and 1,800 physicians.
 - 35.8% live in Long Beach.
 - Majority live outside the City due to high cost of living.
 - Higher wage workers need single-family homes in safe neighborhoods
 - Lower wage workers need apartments.
 - During exit interviews – 20% indicated high cost of housing as reason for leaving the hospital.
 - Physicians – one in eight declines employment offers because housing is not affordable.
 - Lack of surgeons and is recruiting from out of state; there is a severe shortage of specialists.
 - 70% of hospital patients rely on MediCal, which has the lowest reimbursement rates in 52 states (e.g. doctors in California get \$15 to see a child but in other states, the reimbursement can be about \$65 to \$100) – most physicians are just moderate income, but housing costs in S. California are high.

Apartment Owner's Association

- The current apartment vacancy rate in LB is estimated to be between 4 - 5%. This is a healthy vacancy rate by industry standards.
- 800 current foreclosures in LB. Most people foreclosing are first-time homebuyers. So far, not affecting apartment rentals. Rental rates are not declining.
- However, many new condominiums are not selling, creating an issue with homeowners' association fees – not enough owners paying into the HOA fees. An inadequate reserve in the HOA funds makes it even harder to sell the condo units.
- In apartment buildings with 16 units or more State law requires on-site management.
- We need to find a way to consolidate small lots.
- Developers have to want to do inclusionary zoning or it won't work. NIMBYISM combined w/ lack of political will - no progress.
 - Inclusionary housing is not going to be supported by the Apt. Owners Assoc. They see it as the first step to rent control.
 - Inclusionary housing policy must have in-lieu options
- The “historic designation” is being applied too liberally.
- The City has a need for Single Room Occupancy units (SROs).
- Adaptive reuse can be done at times cheaper than new construction.

Architects

- We can't really change or affect materials, labor and lending costs – but we can have an influence on construction and unit affordability through allowing greater density, more mixed use and incubation of innovation/technology to affect the equation.
- Form follows parking. Parking spaces cost \$10,000-15,000 for a surface stall; \$25,000 for a podium stall, and \$50,000 in a structure. The City needs to allow more innovation parking solutions including more tandem, parking lifts and the use of shared parking. Allow Transit Oriented Developments parking reductions and less parking where people don't have as many cars. Combine housing for seniors in regular housing and allow reduced parking. Lower parking costs allows for lower unit costs.

APPENDIX A – 3. May 16, 2008 Focus Group Meetings

- City should loosen up the rules and allow more secondary housing units and create different “efficiency unit” standards.
- City should promote corridor redevelopment opportunities and opportunities in the downtown. Talked about the Americana project (Rick Caruso’s new mixed use development in Glendale, CA) as an example.
- Green building standards can increase construction costs by 1-3%. Up front costs in design are the issue. High rises are easier to make green; harder to go green for smaller developers.
- Universal design – give the designer the specific standards up front. In some countries in Europe, the city provides a printout of the design requirements for each project and this is good for 24 months – locked into the project approval.
- Must stress the importance of good design in making density more acceptable.
- Streamlining of permitting process is always desirable.
- City should select 4 or 5 specific locations for design experimentation where zoning isn’t in the way. Let the General Plan elaborate an urban design plan that gives direction to developers and ask developers to come in with proposals. Put a time limit on it. We must stress the importance of good design in making affordable developments acceptable.

**PUBLIC CORRESPONDENCE RECEIVED AFTER PLANNING
COMMISSION MEETING OF OCTOBER 2, 2008 THROUGH
NOVEMBER 17, 2008**

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Long Beach Area Coalition for the Homeless



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Irene Mercer Treasurer
Mary Coburn-Secretary
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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,
Lutheran Rescue Mission,
North South Bay Substance Abuse
Coalition,
Northern Social Services
National Coalition on Alcoholism,
National Mental Health Assoc of Greater Los
Angeles (The Village /SA)
New Image Emergency Shelter,
New Era Energy
North Coast Interfaith Council,
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Barbara McPherson
Linda & Dorothy Samuel
Laura Sanchez
Gary Schellton

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

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 12th Street, Long Beach CA 90813



Long Beach Area Coalition for the Homeless

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



Long Beach Area Coalition for the Homeless

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.

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November 4, 2008

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**RE: COMMENTS RE: CITY OF LONG BEACH'S DRAFT 2008-2014
HOUSING ELEMENT**

Ms. Creswell, Mr. Beck and Ms. Garrow,

The Legal Aid Foundation of Los Angeles offers the following comments and recommendations regarding the City of Long Beach's Draft 2008-2014 Housing Element.

1. **Quantifying the Number of Extremely Low Income Households and the Extremely Low Income RHNA Number (Draft HE Pages II-12 and V-38)**

The City has not accurately quantified the number of extremely low income households in Long Beach in the Draft Housing Element. The Draft Housing Element states that

extremely low income households comprise 16% of the City's population based upon 2000 census data. Such data, however, is extremely outdated, as it is 8 years old and does not reflect rising poverty rates and rent levels in the City. The City, instead, should use 2006 American Community Survey Census data to calculate the number of extremely low income households and the corresponding extremely low income RHNA number, as this data is much more current.

According to 2006 American Community Survey census data, extremely low income ("ELI") residents comprise 19% of the City's households. This translates into a RHNA of 1,342 units. The methodology used to obtain the number of ELI households and the ELI RHNA number was devised by a U.C. Irvine Graduate Planning student and is set forth below.

Step 1: Locate HUD's data on the Area Median Income (AMI) for the Los Angeles-Long Beach Metro Area, which is estimated to be \$59,800 (this estimate is based on the 2000 Census median income adjusted for local inflation and annual trending).

Step 2: Define the income bracket for ELI and very low income households. This is done using HUD's definitions for extremely low income (30% or less of the AMI) and very low income (50% or less of the AMI). You can then identify the upper income limit of the ELI bracket as \$17,941 and the upper income limit of the very low income bracket as \$29,900 annually. These upper income limits can be used to calculate the exact number of households that fall at or below that annual income level.

Step 3: Determine the total number of households that that fall within the ELI bracket. Using 2006 American Community Survey data on income - reported by the Department of Finance - (refer to Table A) you can establish the number of households that fall within the ELI bracket as 33,013, or 19% of the total number of households. This is done using the data in the Table A and with the following calculations:

2006 Annual Median Income by Household	
Income Group	Households
Less than \$10,000	14,807
\$10,000 - \$14,999	12,368
\$15,000 - \$24,999	19,858
\$25,000 - \$34,999	20,555
\$35,000 - \$49,999	25,606
\$50,000 - \$74,999	30,136
\$75,000 - \$100,000	18,639
\$100,000 or more	32,226
TOTAL	174,195
Source:	

American Community Survey 2006; Department of Finance 2006

Add up the number of households that fall below the \$17,941 upper income limit (calculated in Step 2 above):

Less than \$10,000	14,807
\$10,000 - \$14,999	12,368
\$15,000 - \$17,941	<u>5,838</u> (These are 29.4% of the total households in this category)
TOTAL	33,013 households

Step 4: Determine the number of households that fall within the very low income bracket. You once more use the data in Table A and determine the number of households that fall within the very low income bracket as 57,105. This is done with the following calculations:

Add up the number of households that fall below the \$29,900 upper income limit for very low income households (calculated in Step 2):

Less than \$10,000	14,807
\$10,000 - \$14,999	12,368
\$15,000 - \$24,999	19,858
\$25,000 - \$29,900	<u>10,072</u> (These are 49% of the total households in this category)
TOTAL	57,105 households

Step 5: Calculate the percentage of very low income households that are ELI households using the numbers obtained in Step 3 and Step 4. The calculations are as follows:

$$\begin{aligned} 57,105 &= 100\% \\ 33,013 &= 57.8\% \end{aligned}$$

Step 6: Calculate the portion of RHNA units dedicated to very low income households (2,321) that should be allocated to ELI households (57.8%). This is done with the following calculations:

$$\begin{aligned} 2,321 &= 100\% \\ 1,342 &= 57.8\% \end{aligned}$$

In conclusion, using the methodology described above, the number of RHNA units that should be allocated to ELI households is 1,342 units.

The City should revise the Housing Element to reflect that ELI households comprise 19% of the City's households, not 16%. The City should also revise the Housing Element to reflect that the extremely low income RHNA number is 1,342.

2. Inadequate Analysis of Projected Housing Needs

State law provides that the Housing Element shall contain: "An analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected housing needs for all income levels, including extremely low income households ..." California Government Code §65583(a)(1).

In the Draft Housing Element, the City fails to identify and analyze the housing needs of extremely low-income households. The City should describe the housing needs of extremely low-income households and provide information on the availability and suitability of housing appropriate for these households. As stated in HCD's Building Blocks regarding extremely low-income housing needs, a thorough analysis includes an estimate of the number of: (1) existing households with extremely low-incomes; and (2) projected households with extremely low-incomes. Furthermore, "the analysis should assess the kind of housing available and suitable for extremely low-income households (including supportive housing and Single-Room Occupancy [SROs] units and whether existing zoning permits those housing types." The Draft should be revised to include this analysis.

3. Failure to use 2006/2007 American Community Survey Census Data in Analysis of Current and Projected Housing Needs

The City should have utilized 2006 and 2007 American Community Survey ("ACS") census data to update 2000 Census data. ACS includes updated information, for example, regarding the total number of households, housing tenure and vacancy rates. 2006 and 2007 ACS census data is much more current than 2000 census data and is more relevant in light of increased housing costs, increased overcrowding and decreased rental housing vacancy rates.

The Draft Housing Element should be revised to include 2006 and 2007 ACS census data in the analysis of current and projected housing needs.

4. Extremely Low Income Households as a Special Needs Group

Based upon the high number of extremely low income households in the City (33,013 households, or 19% of the City's population) and the incredibly difficult time they have finding affordable housing, the City should identify extremely low income households as a special needs group in the Housing Element. This would allow the City to develop specific programs to address their housing needs, which includes permanent supportive housing, deeper income targeting and SRO's.

The City should revise the Housing Element to identify extremely low income households as a special needs group and identify specific programs to address their housing needs.

5. **Governmental and Nongovernmental Constraints (Draft HE Section III)**

State law provides that the Housing Element shall contain: "An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, [...] and for persons with disabilities [...], including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Section 65584 and from meeting the need for housing for persons with disabilities..." California Government Code §65583(a)(5).

The Housing Element shall also contain: "An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, and the cost of construction." California Government Code §65583(a)(6).

A. **Inadequate Analysis of Constraints**

The Draft fails to conclude whether most of the discussed potential constraints function as actual constraints to the maintenance, improvement and development of housing in the City. In particular, the discussion of land use controls needs to be strengthened to include more analysis regarding: (1) how residential development standards and zoning constrain affordable housing development; (2) how conditional use permits and site plan review requirements for multifamily housing developments constrain housing; and (3) the effectiveness of the City's second unit and density bonus ordinances.

B. **Housing for Persons with Disabilities**

1. Siting of Housing for Persons with Disabilities

The Draft fails to sufficiently analyze constraints to the development of housing for persons with disabilities, including how local land use and zoning regulations impact the siting and development of housing for persons with special needs. The Draft should also include an analysis of the impacts of conditional use permit requirements in the City's zoning code on housing for persons with disabilities.

2. Definition of Family

The Draft Housing Element should contain an analysis of the definition of "family" in the City's Zoning Code. The definition of "family" excludes residential care facilities, indicating that a residential care facility cannot function as a family. This singles out housing for people with disabilities and treats such housing differently than housing for groups of persons without disabilities who might reside together. The element of a treatment component in a residential care facility does not take away from the family-like

functioning of such a household. The effect of the definition of "family" is to prohibit residential care facilities from siting by right in single family residential zones, which are great locations for many of these licensed facilities. The definition of "family" is also vague and problematic because the term "large" is not defined. See below.

21.15.1010 Family.

"Family" means any group of individuals living together based on personal relationships. Family does not include larger institutional group living situations such as dormitories, fraternities, sororities, monasteries, nunneries, residential care facilities or military barracks, nor does it include such commercial group living arrangements as boardinghouses, lodginghouses and the like.

3. Definition of Medical Office

The definition of "medical office" copied below, while not addressing housing directly, is also important, as it excludes mental health from the definition of medical office and there should be no such distinction. Additionally, this provision violates CA Welfare & Institutions Code Sec. 5120, which pre-empts certain local regulation of mental health treatment programs. This state law indicates that in any zone in which hospitals and nursing homes are permitted, mental health treatment programs are also permitted. This speaks to parity. This definition impacts housing because services should be able to locate near housing.

21.15.1740 Medical office.

"Medical office" means a commercial land use involved in the practice of medicine (not including psychiatric medicine or psychology services), but not including the overnight care of a patient.

C. Replacement Housing Policies (Draft HE Pages III-9, III-23 and III-24)

The Draft Housing Element states that the City requires one-for-one replacement of affordable units demolished or converted in the coastal zone. This requirement is a state law requirement, which comes from the Mello Act, CA Gov't Code Sec. 65590. The Draft Housing Element states that developers can satisfy the Mello Act's replacement housing obligations through new construction, rehabilitation of substandard units, subsidy of existing units or payment of an in lieu fee. There are problems with some of these options. First, three of these options constitute a barrier to the production of affordable housing because they will not result in net, new units that add to the City's housing stock and they will not result in one-for-one replacement of units demolished or converted in the coastal zone, as required by the Mello Act. Rehabilitation of substandard units, subsidy of existing units and payment of very low in lieu fees¹,

¹ The fee for replacement of a one bedroom unit occupied by a low income tenant, for example, is set at \$15,000.00. This is much too low to result in the production of an affordable unit.

therefore, should not be permitted. The City should only allow developers to satisfy their replacement housing obligations through: (1) new construction; (2) adaptive re-use; and (3) payment of in lieu fees set high enough to result in one-for-one replacement. The City should commit in its Housing Element to reviewing and revising its local ordinance implementing the Mello Act, which is located at LBMC Sec. 21.61, to ensure that affordable units demolished or converted in the coastal zone are actually replaced on a one-for-one basis, as is required by State law. The City should also select replacement options that result in net, new units.

D. Reverse Inclusionary Housing

Another barrier to the development of affordable housing that the City fails to discuss in the Draft Housing Element is the City's new policy of requiring affordable housing developers to include 20% market rate units in their developments. While this is not a written policy, developers are consistently told by the City's Housing Department when they come in to propose affordable housing developments that the City will not provide monetary assistance to 100% affordable multi-family housing projects. This policy, which has been labeled by housing advocates as "reverse inclusionary housing," is an enormous barrier to the development of affordable housing because such projects will not be competitive for tax credits with 20% market rate units. Affordable housing developers have consistently told Legal Aid that the City's 80/20 reverse inclusionary housing policy will prevent them from developing affordable housing in the City of Long Beach.

I met with the City's Director of Community Development, Dennis Thys, on August 27, 2008, to discuss this policy. Mr. Thys confirmed in this meeting that the City no longer looked favorably upon dense multi-family 100% affordable housing projects and that it was not likely to assist in the development of such projects. Mr. Thys explained that the one exception to this general policy was that the City would assist in the development of 100% affordable multi-family housing projects for special needs groups.

The Draft Housing Element should be revised to include an analysis of this policy and its impacts on the development of affordable housing. If the City concludes, as it should, that this policy acts as a constraint, the City should discontinue its use of this policy.

E. Impact of Condominium Conversions

Every time a rental unit is converted to a condominium, the City permanently loses one unit of rental housing. The loss of rental units to conversion is severely impacting the City's rental housing vacancy rate, which is at 3%-4%. (A healthy vacancy rate is 5%.) When Long Beach renters are displaced from their units as a result of conversions, they are unable to locate units to which they can move. This is resulting in increased doubling and tripling up of families, as well as homelessness. Since 2002, *the City has lost over 2,133 rental units to conversion:*

- In 2002, 4 units were approved for conversion
- In 2003, 18 units were approved for conversion
- In 2004, 426 units were approved for conversion
- In 2005, 262 units were approved for conversion
- In 2006, 1,073 units were approved for conversion
- In 2007, 350 units were approved for conversion as of 6-07

The City can adopt protections, as many other jurisdictions have done, to curb the negative impacts of conversions. When such protections are adopted, Cities allow for balanced development. Examples of such protections include:

- Imposing a limit on the number of conversions permitted per year
- Permitting conversions only when the City's rental vacancy rate has been at 5% or higher for the previous 12 months
- Denying a conversion application if it would result in the City's vacancy rate dropping below 5%
- Requiring converters to set aside low income units in converted buildings.
- Requiring converters to pay a condo conversion fee to the City to assist in the production of replacement rental housing
- Requiring life-time leases for tenants who cannot afford to purchase their units if the tenants are seniors, disabled or of low income. Life-time leases are typically coupled with reasonable limits on rent increases to prevent increases aimed at displacing tenants.
- Requiring converters to replace converted rental units on a one-for-one basis.
- Providing discretion to City agencies to disapprove conversions based upon the impact they will have on the supply of low and moderate income rental housing

The City has taken the position that the impacts of condominium conversions have not been felt in Long Beach because many converters have not obtained their final maps. This is not a tenable position for three reasons. First, conversions take up to 3 years to obtain all of their needed approvals. Many units are still in the process of obtaining their approvals. (Notably, 1,073 units were approved for conversion by the Planning Commission in 2006 and they are still in the conversion process.) As soon as these units obtain their remaining approvals, they will be permanently depleted from our rental housing stock. Second, and more importantly, based on our experience working closely with tenants in converted buildings, converters typically force tenants out of their units very early on in the conversion process, usually around the time they obtain their tentative map from the City. This means that these rental units are actually removed from the rental housing stock long before they are converted. Finally, while it may be true that many converters will hold onto their converted units and wait to sell them at a time when the housing market is on the rise again, this will not help the City's low income renters because these units will be offered as high end, expensive rentals as a result of the improvements required as part of the conversion process.

The Draft Housing Element should be revised to include an analysis of the impacts of condominium conversion on the City's rental housing stock and how this has impacted the ability of low income residents to find affordable rental housing.

6. RHNA Credits for Units Built Since 2006 (Draft HE Pages IV-2 and IV-3)

According to HCD, jurisdictions may credit units constructed between the base year of the RHNA period and the beginning of the new planning period if the jurisdiction "demonstrate[s] the unit's affordability for lower- and moderate-income households based upon: Actual rents; Subsidies, financing, or other mechanisms that ensure affordability... [;or] Actual sales prices." (HCD "Housing Element Questions and Answers" #17).

The City has wrongfully taken credits towards its RHNA numbers by counting units built since 2006 without demonstrating that they are affordable with information regarding income targeting, rent levels, sales prices and funding streams. The Draft Housing Element should include proof of affordability based upon: (1) actual rents; (2) subsidies, financing, or other mechanisms that ensure affordability; and/or (3) actual sales prices, as required by HCD.

The City should revise the Housing Element to include information regarding rent levels, sales prices, funding streams and mechanisms to ensure affordability for affordable units built since 2006 if they are counted towards meeting the City's RHNA numbers.

7. RHNA Credits for Units Not Yet Built (Draft HE Pages IV-3 and IV-4).

The City has wrongfully taken credits towards its RHNA numbers by counting affordable units that are part of development applications that have been submitted, but have not received any entitlements. This is not permissible because there is no evidence that these developments will be approved.

The Draft Housing Element, accordingly, should be revised to remove RHNA credits taken for units that are part of development applications that have not received any entitlements.

8. Inadequate Land Inventory and Identification of Sites

State law provides that the Housing Element shall contain: "An inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites." California Government Code §65583(a)(3). For nonvacant sites identified in the inventory, the city: "shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, development trends, market conditions, and

regulatory or other incentives or standards to encourage additional residential development on these sites.” California Government Code §65583.2(g)

A. Capacity

To establish the number of housing units that can potentially be accommodated on each site in the City’s site inventory, the analysis should include a description of how capacity of the sites has been established and should show that the inventory can provide for a variety of types of housing. The Draft fails to include any analysis regarding whether the inventory can provide for a variety of types of housing. The Draft should be revised to include an analysis of site suitability for such types of housing as multifamily rental housing, factory-built housing, mobilehomes, emergency shelters and transitional housing. (Govt. Code §65583.2(c))

B. Suitability Analysis for Non-Vacant Sites (Draft HE Pages IV-6 and IV-7)

Pursuant to Govt. Code §65583.2(g), the Draft must specifically describe the methodology used to establish the development potential of non-vacant sites. This analysis must include: (1) the extent to which existing uses may constitute an impediment to additional residential development; (2) development trends; (3) market conditions; and (4) the availability of regulatory and/or other incentives (e.g., expedited permit processing, fee waivers/deferrals) that encourage additional residential development on these sites. The Draft fails to include an analysis of these factors. For example, all but two of the sites proposed by the City currently have existing uses such as a parking lot, office building, restaurant or retail store. The Draft Housing Element includes *no discussion* as to why the City believes these existing uses are likely to cease. The Draft Housing Element further includes *no discussion* as to why the City believes future uses of these sites are likely to be residential as opposed to other uses. The Draft Housing Element also fails to consider the impact of the current down housing market in the future development of these sites. Finally, it appears that the City is relying solely on the base zoned density to establish development potential on these sites. Therefore, the land inventory and identification of sites is inadequate and must be modified to include further analysis.

C. Restrict Some Sites to Low Income Multifamily Housing

A percentage of the multifamily sites should be reserved for low and very low income affordable multifamily housing so that all sites are not taken for high cost rental housing. At a minimum, 50% of sites zoned for multifamily should be reserved for predominantly low income affordable housing developments. (Such areas are often referred to as “affordable housing opportunity zones.”)

9. Housing Trust Fund Statements (Draft HE Page IV-11)

The City cannot contend as it does in the Draft Housing Element that the Housing Trust Fund augments State and Federal programs to provide housing for extremely low income households. The Housing Trust Fund is essentially unfunded and has not produced one unit of affordable housing since it was created in 2005.

The City should revise the Housing Element to reflect that the Housing Trust Fund is essentially unfunded and that it has not produced one unit of affordable housing. The City should also revise the programs section of the Housing Element to commit to identifying stable funding sources for the Housing Trust Fund within the next 6 months. (See Comment #15 A for further discussion regarding the Housing Trust Fund)

10. Commercial Linkage Fee statements (Draft HE Page V-4)

The Housing Element states that a commercial linkage fee was evaluated by the City and it was determined that the commercial market would not support such a fee. This is not true. Two separate consultants hired by the City, David Rosen and Associates (2003) and Muni Financial (2008), both concluded in their respective studies that such a fee was economically feasible and both recommended appropriate fee levels.

Staff should revise the Housing Element to state that two separate consultants hired by the City concluded that a commercial linkage fee was economically feasible. The Housing Element should also be revised to state that such a fee has not been voted on by the City Council. Finally, the programs section of the Housing Element should be revised to state that the City Council will consider adopting a commercial linkage fee within the next 6 months.

11. Inadequate Analysis Regarding Progress Towards Meeting 2000-2005 RHNA Numbers (Draft HE Page V-8)

The Draft Housing Element, at page V-8, credits units rehabbed towards meeting its 2000-2005 RHNA numbers without demonstrating that it has met the required criteria to take such RHNA credits. Pursuant to HCD Questions & Answers #50, local governments may satisfy *up to 25%* of their RHNA numbers through substantial rehabilitation only if: (a) the rehabilitated units resulted in a net increase in the stock of housing affordable to low and very low income households; (b) the rehabilitated units were at imminent risk of loss to the housing stock; (c) displaced tenants who were not eligible for relocation assistance under state law received relocation assistance consistent with that required under H&S Code Section 17975, including a minimum of four months rent, moving expenses and comparable replacement housing; (d) displaced occupants had the right to re-occupy the rehabilitated units; and (e) the rehabilitated units have long term affordability covenants of not less than 20 years or any other term required by federal or state funding or law.

Accordingly, the Draft Housing Element should be revised to indicate what percent of RHNA credits came from substantially rehabbed units. It should additionally be revised to indicate whether the rehabbed units for which RHNA credits were taken meet the following requirements: (a) the rehabbed units resulted in a net increase in the stock of housing affordable to low and very low income households; (b) the rehabbed units were at imminent risk of loss to the housing stock; (c) displaced tenants who were not eligible for relocation assistance under state law received relocation assistance consistent with that required under H&S Code Section 17975, including a minimum of four months rent, moving expenses and comparable replacement housing; (d) displaced occupants had the right to re-occupy the rehabilitated units; and (e) the rehabbed units have long term affordability covenants of not less than 20 years or any other term required by federal or state funding or law.

12. Inadequate Statement of Goals and Quantified Objectives

State law provides that the Housing Element shall contain: "A statement of the community's goals, quantified objectives, and polices relative to the maintenance, preservation, improvement, and development of housing." California Government Code §65583(b).

There should be a corresponding goal and policy in the Housing Element for each housing need, resource inadequacy and constraint identified in the Housing Needs Assessment section of the Draft. In addition, there must be a quantified objective for each housing need identified. Failing to include an adequate analysis of the City's housing needs, resources, and constraints, the Draft also fails to contain both a complete statement of goals and policies as well as a complete statement of the City's quantified objectives. Furthermore, since the constraints analysis is inadequate, an analysis of the adequacy of the goals and policies section with regards to addressing constraints is impossible. The City should also revise its quantified objectives to include extremely low-income objectives.

13. SRO Ordinance (Draft HE Page V-23)

The City should create an SRO ordinance that permits SRO's in any high density multi-family residential zone or commercial/light/industrial zone. SRO housing should not require a conditional use permit and it should not be grouped with Special Group Residences as it currently is in the Draft Housing Element. SRO's are a form of multi-family housing and they should be treated as such in the City's zoning code.

Staff should revise the Housing Element to include the creation of an SRO ordinance that permits SRO's in any high density multi-family residential zone or commercial/light/industrial zone where multi-family housing is permitted.

14. Inadequate Programs and Five-Year Schedule of Actions (Draft HE Pages V-19 through V-37)

The Housing Element shall contain: "A program which sets forth a five-year schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element...to make adequate provision for the housing needs of all economic segments of the community..." California Government Code §65583(c).

As stated above, the Draft's goals, policies, and quantified objectives are deficient, thereby making it difficult to adequately analyze the program of actions upon which these policies and objectives is based. Additionally, without an adequate analysis of constraints, it is difficult to recommend programs to remove these constraints as required by Govt. Code §65583(c)(3). For these and the following reasons, the program of actions fails to comply with the requirements of the law.

An effective housing program section should include quantified objectives and proposed measurable outcomes, as well as definite time frames for implementation. (HCD "Questions and Answers" #36) Additionally, the programs section must demonstrate the City's firm commitment to implement specific programs and actions. Many of the programs fail to include sufficiently specific language by which to guide the City over the planning period to carry out the programs' intentions. Many of the programs are written with such loose and vague language that they do not commit the City to undertaking any real actions. The following programs contain loose and/or vague commitments and should be revised to include specific and meaningful objectives:

- **Preservation of at Risk Units:** The City commits to doing little more than monitor the status of units and provide information. This will not preserve at risk units.
- **Section 8:** The City does not explain how it will encourage property owners to accept Sec. 8, nor does it state how or when the Housing Authority will raise the payment standard.
- **Universal Design:** The City only commits to evaluating the feasibility of additional incentives. This is meaningless.
- **HOME Security Deposits:** The City commits to providing assistance to only 50 households per year in a City with 500,000 residents. This is not enough in light of the housing crisis faced by the City's low income renters. The City should expand this program to provide assistance to at least 500 households per year.
- **Multi-family Housing Inspection:** The City does not commit to monitoring or enforcing inspection orders to ensure that repairs are actually made. Sending an inspector out to inspect a unit will not lead to repairs being made without monitoring and enforcement of the repair order. Low income residents continually complain that inspections do not result in repairs because the City does not do anything beyond issuing a repair letter, which landlords ignore because they know there is no penalty for failing to comply.
- **Housing Production:** The City does not commit to any programs that will significantly increase housing production in the City. The City is not eligible for

Prop 1C money because its Housing Trust Fund (HTF) does not have any dedicated sources of local revenue and because one-half of the HTF is targeted to households earning 120%-150% of area median income (nearly \$90,000 per year). The City does not have adequate sites as it alleges in this Section because the City has inappropriately taken RHNA credits. (See earlier discussion above re: this in #6 and #7.) The City's identification of sites is also faulty because the City did not include an analysis regarding the suitability of non-vacant sites. (See earlier discussion above re: this in #8.) To truly increase housing production, the City should adopt the programs discussed below in #15.

- **Constraints:** The City must amend this section to include a discussion of the following constraints, which the City failed to identify in the Draft Housing Element: (a) conditional use permits and site plan reviews; (b) housing for persons with disabilities; (c) reverse inclusionary housing; and (d) condominium conversions. (See discussion above in #5 re: each of these constraints.)
- **E-Government:** The City fails to state how it will improve E-government.
- **Development Incentives (density bonus and relaxed standards):** Many jurisdictions around the state have adopted local ordinances implementing state density bonus law. The Housing Element does not address how the City of Long Beach's failure to adopt a local ordinance has impacted the use of density bonuses. With respect to relaxed standards for affordable developments, the Housing Element fails to state how often the Planning Commission exercises its discretion to relax standards for affordable developments. Having discretion to do something is meaningless if the discretion is not exercised when appropriate.

The programs section must be revised to address the inadequacies described above.

15. Programs to Increase Affordable Housing Production

The City has not demonstrated in the Draft Housing Element that it has sufficient sites to accommodate housing for its low income residents. The City, moreover, did not come close to meeting its affordable RHNA numbers for the last planning period. The City has not committed in the Draft Housing Element to any programs that will significantly increase housing production in the City. The City must produce a total of 5,440 affordable units in the next planning period to meet the housing needs of its low and moderate income residents. The City has an annual housing budget (from redevelopment housing set aside money and HOME dollars) of \$25 million. When you consider that it costs approximately \$400,000 to produce one unit of affordable housing, it becomes clear that the City must find ways to supplement its housing budget to meet the housing needs of its low income residents.² The City should commit to creating new programs to encourage the production of affordable housing in the Housing Element.

² The City leverages housing dollars, on average, at a rate of 3 to 1. This means that for every \$100,000.00 the City commits to housing development, it can leverage \$300,000.00 from other funding sources. Accordingly, if the City has an annual housing budget of \$25 million and it funds affordable units at a rate of \$100,000 per unit, the City will produce only 250 affordable units per year. While 250 affordable units per year will help some Long Beach families, this will not come close to meeting the City's affordable RHNA number of 5,440 units by 2014. The City, accordingly, should adopt policies to encourage the production of affordable housing.

The City should revise the Programs Section of the Housing Element to include the following programs to encourage the production of affordable housing:

A. Comprehensive Funding Plan for the Housing Trust Fund, with Dedicated Diversified Local Sources of Funding

At its October 2, 2008 hearing regarding the Draft Housing Element, the Long Beach Planning Commission recommended that the City Council identify stable funding for the Housing Trust Fund in the Draft Housing Element. The City Council should follow the Planning Commission's recommendation and include funding for the Housing Trust Fund in the programs section of the Housing Element.

The City created a Housing Trust Fund in 2005. Since its creation, the Housing Trust Fund has remained essentially unfunded and has never produced one unit of affordable housing. The City should commit in the Housing Element to identifying local dedicated revenue sources for the Housing Trust Fund in the amount of at least \$10 million within the next 6 months. The first step in this process is for the City to release the Housing Trust Fund Revenue Source Study, which was completed earlier this year by Muni Financial. To date, City Staff has refused to release this Study to the public. This Study should be released immediately and the City should commit in the Housing Element to adopting dedicated, diversified local sources of revenue for the Housing Trust Fund within six months.

B. Mixed Income Housing Ordinance

The City should adopt a mixed income housing ordinance, which would require developers of new apartment and condominium developments to include a percent of units (typically 10-15%) as affordable to low and moderate income households. There are 170 jurisdictions in California with mixed income housing ordinances. Such ordinances create equitable distribution of affordable housing and prevent the concentration of affordable units in one area.

C. Commercial linkage Fee

The City should adopt a commercial linkage fee to support a housing/jobs balance in the City. With a commercial linkage fee, developers of new commercial developments are charged a fee per square foot of new development. These fees are then be used to create new housing targeted to the income levels of those who would work in the new developments. Such fees, therefore, create a balance between housing and jobs. Nearly 20 cities in California have adopted commercial linkage fees.

D. Condominium Conversion Fee

As discussed in #5 above, condominium conversions are rapidly depleting the City's rental housing stock and making it even more difficult for low income families to find affordable rental housing. The City should require converters to include affordable units in converted buildings or pay a condominium conversion fee that can be used to build replacement rental units. Such a policy would support balanced development in the City.

E. Increase the Redevelopment Housing Set Aside

The City should increase the redevelopment housing set aside from the minimum 20% to 30% to create additional funds for affordable housing development. By increasing the redevelopment housing set aside from the minimum required amount of 20% to 30%, this would create approximately \$8 million in additional revenue for housing development. Many redevelopment agencies in California have increased their redevelopment housing set asides above the legally required minimum of 20% to address local housing needs (E.g., the cities of L.A., Folsom and Buellton set aside 25%; Anaheim sets aside 30%; and San Francisco sets aside 50%.)

F. Community Land Trusts

The City should create a community land trust, which would allow for the development of *permanent* affordable housing. With a community land trust, Long Beach could avoid the problems associated with expiring affordability covenants.

Thank you for your consideration of our comments. Please feel free to contact me if you have any questions. I can be reached at (562) 304-2520.

Sincerely,



Susanne Browne
Attorney-at-Law

cc: Mayor Bob Foster
Council Member Bonnie Lowenthal
Council Member Suja Lowenthal
Council Member Gary DeLong
Council Member Patrick O'Donnell
Council Member Gerrie Schipske
Council Member Dee Andrews
Council Member Tonia Reyes Uranga
Council Member Rae Gabelich
Vice-Mayor Val Lerch

Long Beach, CA 90802
November 5, 2008

Cathy Creswell, Director
Department of Housing and
Community Development
Division of Housing Policy Development
1800 Third Street, Suite 430
Sacramento, CA 95811

I appreciate this opportunity to present my thoughts related to the Draft 2008-2014 Housing Element of the General Plan of the City of Long Beach prior to its being forwarded to the California Department of Housing and Community Development. Below please find the text of my remarks prepared for delivery to the Long Beach City Council meeting held October 14, 2008, at which it considered the Draft and sent it back for inclusion of certain elements which it had recognized as important enough to warrant a delay in the document's transmittal to the HCD for approval.

Respectfully submitted,



Gary Shelton
1243 East Ocean Boulevard
Long Beach, California 90802
(562) 590-9520

cc: Craig Beck, Department of Development Services, City of Long Beach
Pat Garrow, Department of Development Services, City of Long Beach
City of Long Beach, Mayor and Members of the City Council

[Text of my comments follows]

**At City Council, Long Beach, California
October 14, 2008**

Honorable Councilmembers:

I wish to address THREE specific points in the Housing Element as it relates to conformance with the Housing Accountability Act of 2007

(SB 2-Cedillo, et al). The three points are “capacity, feasibility and suitability.” The Housing Element update must incorporate a by-right

The Housing Accountability Act of 2007 (SB 2, Cedillo) put into place a requirement that this Housing Element update “identify a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit.” This has become known as “by right” permitting of emergency shelters. My comments will focus on THREE points where I feel that, in terms of its conformance with the mandates of the Act, this Housing Element falls short, even to the point of its being insufficient and non-compliant.

First, capacity: Pursuant § 65583(a)(4)(A) of the Act, “[t]he identified zone or zones shall include sufficient capacity to accommodate the need for emergency shelter...”). Chart 14 at page II-21-22 shows this need to be 1,625 “unsheltered” persons, but fails to demonstrate that the PD-31 and IL zones which have been identified (p. III-16) include sufficient capacity to accommodate this need. In fact, the reality on the ground would indicate that the identified zones fall far short of sufficient capacity.

PD-31 is the Villages at Cabrillo, a U.S. Navy housing reuse project which is currently houses over 500 homeless men, women and children and is adding capacity for 80 homeless families. But it realistically has no additional capacity for homeless shelter facilities due to limited developable acreage, economic constraints and especially due to its secure and sober operations model, situations which are unlikely to change between now and 2014.

Neither can the IL (light industrial) zone be shown to have capacity for sufficient emergency shelters to meet the identified need. Comprised of some 17 separate sites, all of which are located west of Redondo Avenue, a significant portion of this zone presently is occupied by stable and long-term uses: the row of auto dealerships on Cherry Avenue south of Carson Street; the former Home Depot site and present Long Beach Unified School District facility at South and Cherry; Rancho Suspension-Tenneco on Atlantic Avenue near the 91-710 interchange; occupied residential housing near 70th and Paramount; the driving range on Atlantic Avenue near the 710-405 interchange and the headquarters of Long Beach Gas & Oil at Spring and Junipero. These six uses alone reduce the acreage and reasonable capacity of the IL zone by well over half.

Second, suitability: Pursuant Paragraph 1 and § 65589.5(d)(5)(A) of the Act, the Legislature has recognized the importance of the suitability of the zone for emergency shelter use. A site visit to the IL zone areas readily shows serious lack of suitability from several points of view. Given the unlikelihood that a significant portion of the 1,625 unsheltered people will access an emergency shelter by any method of transport other than public transportation, walking or both, the distance from nearby bus stops to the shelter becomes a key factor in the sites' suitability. Of the remaining 9 IL-zoned areas, 7 of them are within ½ mile of a Long Beach Transit stop. One of the other two is as far as 2½ miles from a bus stop (the strip of land between Pacific Coast Highway and Willow Avenue along the west side of the railroad tracks fronting the I-103 Terminal Island freeway; the other is the driving range site which is about ¾ of a mile from the BlueLine Wardlow Station. Other barriers to suitability of the IL-zone sites include over-head high tension lines (south of the Tennico site), low-lying flood zones (below Drake Park), and undersize parcels (Spring/405 off-ramp landscaped area).

Finally, feasibility: There is a conundrum at Goal: Address the Unique Housing Needs of Special Needs Residents—Policy 2.2 (p. V-14), “Implement the feasible components *Within Our Reach: A Community Partnership to Prevent and End Homelessness, Long Beach’s 10-Year Plan Report*. The “10-Year Plan” is currently in the Council’s Housing and Neighborhoods Committee and on the City Manager’s desk awaiting some decisions as to which components of it are feasible. This creates the dilemma that, until such time as any of the 10-Year Plan’s 400+ recommendations are determined to be feasible, the 2008-2014 Housing Element is constrained from moving forward in respect to its full compliance with the Housing Accountability Act of 2007 and putting a roof over the heads of 1,625 of our neighbors who are unsheltered every night.

Thank you very much for your attention to these issues.

**Respectfully,
Gary Shelton
1243 E. Ocean Blvd.
Long Beach, CA 90802
562-590-9520**

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3025 E. 5th St. #6
Long Beach, CA 90814

Ms. Pat Garrow
Department of Development Services
333 W. Ocean Boulevard, 5th Floor
Long Beach, CA 90802
Email: PatGarrow@longbeach.gov

Cc: Long Beach City Council members, Mayor Bob Foster
California Department of Housing and Community Development

October 27, 2008

Dear Ms. Garrow:

Thank you for the opportunity to comment on the Draft 2008-2014 Housing Element. This document expands on my testimony presented at the Long Beach City Council Meeting on October 14, 2008. At the conclusion of the discussion of the Housing Element, the Council requested that City staff address the issues raised by community members during the public comment period and revise the document accordingly. I respectfully submit these comments to assist in that process.

Housing Needs Assessment for Homeless Persons and Senate Bill (SB) 2

1. Government Code Section 65583(a)(7) (see Chapter 633, Statutes of 2007 Senate Bill 2) requires a housing needs assessment for homeless persons and families. The components of this assessment should include an analysis of existing shelter, transitional and supportive housing beds/units by type and a measure of unmet homeless needs. The Housing Element (HE) reports statistics on the unmet shelter/housing needs for the homeless in Long Beach specifically on p. 11-22 in Chart 14. The figures are called the "Unmet need/gap" in the document. The calculations used to obtain the figures are not clear. Specifically, it is not clear how the 380, 339, and 906 figures are derived and how they are related to the numbers for emergency and transitional sheltered and unsheltered homeless persons in 1a and 2a of Chart 14.

- a. Request: Include an explanation in the HE of how these numbers were calculated.
2. "SB 2 clarifies existing law by requiring zoning identified for emergency shelters to include sufficient capacity *to accommodate the need*. The identified zone(s) must have sufficient capacity, when taken as a whole, *to meet the need for shelters identified in the housing element*, and have a realistic potential for development or reuse opportunities in the planning period" (emphasis added, p. 9, Chapter 633, Statutes of 2007). It is not clear how City staff used the unmet need/gap analysis figures in identifying zones with sufficient capacity for emergency shelters.

In addition, the HE states on the bottom of p. III-16 and 17: "Site inventories show that opportunities exist in the City for both the conversion of existing buildings into shelters and for the construction of new facilities on underutilized properties." However, there is no evidence provided to demonstrate capacity in the designated zones (Light Industrial and Planned Development 31 – see p. III-16 of HE), such as available sufficient acreage or enumerations of the buildings or square feet of space that could be reused as or converted to emergency shelters. SB 2 states that "the element should also address available acreage (vacant or underutilized) and the realistic capacity for emergency shelter in the zone" (p. 9, Chapter 633, Statutes of 2007).

- a. Request: Include an explanation in the HE of how the unmet need/gap figures are addressed and resolved by the capacity in the zones identified for emergency shelters.
- b. Request: Add specific evidence to show that designated zones have suitable and sufficient capacity to address the unmet need for homeless shelters.
- c. Request: Expand the number of zoning areas available for emergency shelter in order to ensure capacity.

Clarification for point 2.c. During the City Council Meeting on 14 October, there was discussion about the general resistance by some community members to the siting of homeless services and shelters and that City staff are hesitant to expand the number of designated zones for the locating of shelters due to this known resistance. Staff indicated that they would need to canvas for community buy-in before adding additional zones, a request that the City Council declined. Community support for designated zones is not required under SB 2. The City is not required to obtain conditional use permits

for siting these emergency shelters and therefore is not required to obtain community approval. Such community NIMBYism is precisely the issue that SB 2 was meant to address.

3. The distribution of the zoning areas designated for homeless shelters (Light Industrial (IL) and Planned Development 31 (PD 31)) are disproportionately in the northern and western parts of the city (see attached map). Bullet one on p. III-14 discusses the approval process for such Special Group Residences. It reads: "Standard conditions are that no similar facility can be operate[d] within ½ mile from [one] another, thus furthering state law and fair housing goals to reduce the impactation of lower-income households in any one area." If state law also requires this goal of homeless shelters, does this affect the suitability of IL and PD 31 as designated zones for shelters that do not require a conditional use permit?
 - a. Request: Clarify in the HE whether state law and fair housing goals apply conditions affecting impactation (such as the ½ mile buffer) to the location of emergency shelters zoned under SB 2 requirements.
 - b. Request: Expand the number of zoning areas available for emergency shelter in order to ensure an equitable distribution of sites across the city.
4. "SB 2 provides that transitional and supportive housing constitute a residential use" (p. 14, Chapter 633, Statutes of 2007). Transitional housing "can take several forms, including group housing or multifamily units..." (p. 13, Chapter 633, Statutes of 2007). The HE proposes to comply with SB 2 by differentiating between "transitional and supportive housing that operates as group residence versus transitional and supportive housing that is regular rental apartments" (p. III-17) and applying different zoning requirements, specifically conditional use permits, for housing that operates as group residence. SB 2 does not seem to make a distinction between types of transitional or supportive housing. Does SB 2 allow for distinguishing between transitional and supportive housing in this manner? In addition 1) What is meant by regular rental apartments and are not some special group residences also regular rental apartments?
 - a. Request: Please clarify how SB 2 allows for transitional and supportive housing to be categorized into different classes and treated differently in terms of zoning.
5. The HE plans to amend the zoning code to accommodate single-room occupancy (SRO) units as Special Group Residence (p. III-17). This type of affordable private housing could serve as transitional or supportive housing that is regular rental

housing, so it should have at least one zone designation by right, especially if it constitutes an adaptive reuse of former group residence or hotel/motel property.

- a. Request: Create an SRO zone designation by right that is separate from Special Group Residence to facilitate the use of SROs as transitional or supportive rental housing.
6. Project Achieve is described as a transitional shelter on p. V-5. My understanding from conversations with the director of the shelter and the City's homeless services officer is that Project Achieve is classified as an emergency shelter under CA state law.
 - a. Request: Clarify the legal categorization of Project Achieve and change point 25 in Chart 49 on p. V-5 accordingly.

Evaluation of the 2000-2005 Housing Element

7. The summary of accomplishments for the 2000-2005 HE (Chart 49 p. V-3) states in #13 that "adequate sites, zoned for housing to meet the City's RHNA targets, were provided." However, Chart 50 (p. V-8) states that "only the higher income targets were achieved" in meeting RHNA construction targets. The HE does not provide evidence to demonstrate the adequacy of the sites zoned for housing to meet the 2000-2005 RHNA targets. Such evidence should include sufficient acreage (vacant or underutilized), enumerations of the existing buildings or square feet of space with appropriate densities, adequate access to public services, and an assessment of the realistic capacity for development of housing within these zones. The HE should provide an assessment of whether developers took advantage of these sites to produce housing and if they did not, whether it was a reflection on the lack of capacity of the sites. While meeting RHNA housing production targets is not required of the City, an assessment of the realistic capacity of the zoned sites in hindsight is appropriate for determining the extent to which the suitability of sites plays a role in preventing housing development.
 - a. Request: Create a program to systematically evaluate, with quantitative performance benchmark measures, the achievements accomplished toward meeting RHNA targets in order to learn from past plans and revise new plans to address past inadequacies accordingly.
8. There are several statements within the HE like this one: "In summary, the City's list of housing incentives has historically had mixed success, largely due to market forces" (p. V-10). The HE should provide more specifics about what exactly is it about market forces and the city's options to address market conditions (p. III-1) that did not work for moderate, low, and very low income housing, while it worked for above

moderate housing. For example, what is the cost of 1 unit of low income housing or land values in 2000 versus the cost in 2005 and how does that compare to inflation?

- a. Request: Provide evidence to demonstrate quantitatively how "market forces precluded achievement of the 2000-2005 RHNA construction targets" (p. V-8). Using quantitative measurement, demonstrate the increased costs of land, labor, and construction materials and how competing "with construction and energy demands from China, India, and other emerging nations" (p. V-9) has an impact on housing production in Long Beach.

2008-2014 Plan Goals, Policies, and Programs

9. Given the City's modest success with housing incentives (as stated in the HE), the HE should include a program to research and implement more incentive options and other methods to increase housing production. The program should include a plan for establishing a system for evaluating how well the current incentive programs are working with performance measures such as how many developers have taken advantage of such incentives and what kind of housing has been build with it. The program should encourage consultation with developers to determine what kinds of incentives would work for them, so that the City can facilitate more cooperation with private and non-profit developers to actually build affordable and mixed income housing. Such cooperation should facilitate meeting RHNA targets, not just by providing adequate zoning, but with actual housing.

In addition, the City's 10-year plan to end homelessness includes in Appendix E (see *Within our Reach*, p. 79-80) information about the 170 cities and counties in California that use inclusionary zoning ordinances including Lakewood, Huntington Beach, Laguna Beach, and San Diego County. San Diego County has seen growth in residential building permit activity since the adoption of the ordinance.

- a. Request: Create a program to actively explore and establish more incentive programs with the assistance of developers.
- b. Request: Create a program to evaluate inclusionary zoning ordinances.

Thank you again for the opportunity to participate in reviewing the housing plan for Long Beach. Please include these comments as part of the Draft 2008-2014 Housing Element and submittal process to the Long Beach City Council and California Department of Housing and Community Development.

Sincerely,



Christine L. Jocoy, Ph.D.
cjocoy@gmail.com
562-544-9354

State-wide Developers, Inc.

6242 Napoli Court,
Long Beach, California 90803
Off: 562/597-6801 Cell: 682.7882 Fax: 562/498-3621
Email: wylid.crd@verizon.net

11/5/08

To: Planning Director Craig Beck

Dear Craig:

Please find the enclosed package for your review, which was prompted by the recent article in the Long Beach Business Journal that contained the following heading: "City Council to Discuss Housing Element, Low Income Units on November 11".

I believe you will find the information quite timely in addressing one of the article's concerns that dealt with "workforce housing" needs. The Converta-Belle housing concept clearly contributes towards fulfilling this need.

Therefore, my associate, Roger Peter Porter (AIA) and I, would ask that you consider adding this important tool as part of the upcoming draft 2008-2014 Housing Element of the General Plan. At the very least, we would ask that you recommend provisions be added to the draft HEGP adding the Converta-Belle as an option in the process.

As you will see within the attached package, the Converta-Belle concept has already been unanimously and conditionally approved by the Long Beach Planning Commission for the development of a demonstration project, and a search for a proper site is in process.

Once the demonstration project has been constructed and sold, its success will motivate developers to take full advantage of the Converta-Belle's innate market safety and profitability, and they will not require anywhere close to the financial assistance presently provided by the City for "workforce housing" development.

With regard to the current economic conditions in the Country, if some of the recent buyers of homes in Long Beach would have instead purchased the Converta-Belle, all those owners would have had to do was convert a portion of their residence to a rental, which would have provided them the extra income to honor their loan obligations until the crisis passed - avoiding foreclosure.

Please contact me if you have any questions prior to the Nov. 11th Council hearing.

Best regards,

Alex

Alex Bellehumeur
State-Developers, Inc.
President

Alex Bellehumeur
Founder/President

- State-Wide Developers, Incorporated
- San Pasqual Stables, LP
- International SpeedHockey League (www.SpeedHockey.com)
- Rough Rider, Incorporated.

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562.682.7882 Cell
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wylid.crd@verizon.net

"g.bullock3"
<g.bullock3@verizon.net>

To <Pat_Garrow@longbeach.gov>

cc

11/17/2008
08:33 PM

Subj Draft Housing Element Comments
ect

November 16, 2008

Pat Garrow:

I am a resident of Long Beach-7th District (3761 Falcon Ave.) and a member of Housing Long Beach Steering Committee. I was unable to stay for the council item #19 Draft Housing Element considered at the Tuesday November 11th council meeting; but would like my comments added to other comments accompanying the Draft Housing Element when it is sent to the State.

A major concern is that city staff has not been willing to cooperate with HLB and others in revising the Draft Housing Element as recommended by the Planning Commission and City Council. At the October council meeting, the council voted to continue the HE item for a month so that staff could reply to comments and recommendations and work with housing advocates on drafting proposed policy options and new HE language. Staff has ignored the council's recommendations and intent again.

In addition, I would like to summarize revisions I would like to see in the HE, that would encourage the production of affordable housing:

- A. A comprehensive funding plan for the housing trust fund.
- B. A mixed income housing ordinance.
- C. A commercial linkage fee (to create a jobs/housing balance)
- D. A condominium conversion fee.
- E. An increase of the redevelopment housing set aside from the minimum of 20% to 30;
and
- F. Community land trusts (to create permanent affordable housing)

Thank you for your consideration of these matters and I hope to see you at the next council meeting.

Sincerely,

George V. Bullock

PaulCDJ@aol.com

11/12/2008 06:30 PM

To **lbds@longbeach.gov**

cc

Subject **Sent From: LBDS - For SUZANNE M. FRICK**

Dear Ms. Frick,

This is to inform and request that the Converta Bella housing conversions NOT be included for any future Long Beach development and housing plans and be kept out of the Housing Element.

This type of housing has the potential to be a mini version of the Crackerbox fiasco that is a case study in planning text books. Just a few years ago we went through the whole process of looking at the potential of that type of housing. It was solidly turned down, by Staff, the Planning Commission and the Council.

The fifteen questions on the housing plan is enough without adding a "camels nose under the tent" as Mr. Bellhumer said, in last nights Council meeting. Alex is a well respected builder in this city, but this plan is not good in that it increases density in what should be lower density neighborhood, does not provide parking, and is simply the same as a garage conversion when it comes down to it.

Again, please do not include mention of it in the Housing Element since there is enough there without re opening a concept that was thoughtfully examined and turned down, just a few years ago.

Regards,

Paul de Jung
Long Beach. 439 4544.

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APPENDIX B – HOUSING DEVELOPMENT CAPACITY

Housing Development Activity – RHNA Cycle 2006-2014

		Very Low	Low	Moderate	Upper
RHNA Assignment	9,583	2,321	1,485	1,634	4,143
Units Completed 1/1/2006 to 6/30/2008	1,359	0	5	12	1,342
Units Rehabbed and Income Restricted	337	336	0	0	1
Units Under Construction	758	121	50	0	587
Entitlements Granted	1,483	0	0	46	1,437
Application Received – Zoning allows density	886	0	0	97	789
Application Received – Zoning change required	1,435	65	0	0	1,370
Sites Suitable for Housing Development	5,199	2,080	1,507	1,612	0
Total	11,457	2,602	1,562	1,767	5,526
Remaining	-1,874	-2817 <u>281</u>	-77	-133	-1,383

Under Construction

Address	Name	Units	Very Low	Low	Moderate	Upper
421 West Broadway	Lyon West Gateway	291		26		265
2080 Obispo	Alamitos Ridge (106 SFRs)	106				106
210 East 3 rd Street	Lyon Promenade	104				104
350 Long Beach Boulevard	Gateway on 4 th	82				82
2001 River	Villages at Cabrillo	81	56	24		1
2555 Atlantic Avenue	Menorah House (Senior)	66	65			1
433 Pine Avenue	Newberry Lofts	18				18
431 East 6 th Street	10 units	10				10
		758	121	50	0	587

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

Entitlements Granted

Address	Name	Units	Very Low	Low	Moderate	Upper
604 Pine Avenue	Press Telegram Lofts	542				542
777 East Ocean Blvd.	Shoreline Gateway	358				358
150 West Ocean Blvd.	OceanAire	216				216
100 East Ocean Blvd.	Edgewater	155				155
2010 East Ocean Blvd.	56 units plus 40 hotel rooms	56				56
1628-1724 East Ocean Blvd.	51 units plus 47 motel rooms	51				51
2355 Long Beach Blvd.	Metahousing	46			46	
125 Linden Avenue	Broadlind Condos	30				30
4200 East Anaheim Street	29 units	29				29
		1,483	0	0	46	1,437
	<u>Progress Since 01/01/06</u>	3,600	121	55	58	3,366
	<u>Remaining RHNA</u>	5,983	2,200	1,430	1,576	777

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

Application Received – Zoning Allows Density

Address	Name	Units	Very Low	Low	Moderate	Upper
301 Pine	Pine Pacific Block	375				375
500 West Broadway	176 residential units	176				176
432-440 West Ocean Blvd	80 residential units	80				80
245 Pine Avenue	AMC Theatres	68				68
1598 Long Beach Blvd	64 residential units	64				64
2114 Long Beach Boulevard	Meta Housing Corp.	49			49	
2000-2199 Atlantic Avenue	48 Town homes	48			48	
110 West Ocean Boulevard	Ocean Center Reuse	26				26
		886	0	0	97	789

Application Received – Zoning Change Required

Address	Name	Units	Very Low	Low	Moderate	Upper
11 Golden	Golden Shore Master Plan	1,370				1,370
3635 Elm Avenue	65 units senior assisted living	65	65			
		1,435	65	0	0	1,370

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

18 Sites Suitable for Housing Development

Location	Acres	Units/ Acre	Units	Very Low	Low	Moder- ate	Upper
World Trade Center (600 West Broadway)	5.61	200	1,122	449	325	348	0
Old State Office Building (245 West Broadway)	2.68	200	536	214	155	166	0
Broadway & Daisy Avenue (NW & NE Blocks)	6.04	75	453	181	131	140	0
Long Beach Boulevard & 1 st Street – NW Corner	2.06	200	412	165	119	128	0
Long Beach Boulevard & Spring Street – SE Corner	8.35	44.6	372	149	108	115	0
Long Beach Boulevard & Willow Street– SW Corner	3.37	108	364	146	106	113	0
Long Beach Boulevard & Broadway – NE Corner	3.53	96	339	136	98	105	0
Long Beach Boulevard & Anaheim Street – SW Corner	2.71	108	293	117	85	91	0
Long Beach Boulevard & 6 th Street – NW Corner	3.53	75	265	106	77	82	0
Long Beach Boulevard & Willow Street– SE Corner	2.18	108	235	94	68	73	0
Long Beach Boulevard & 9 th Street – SE Corner	2.00	108	216	86	63	67	0
Santa Fe Avenue & Spring Street – NW Corner	4.92	30	148	59	43	46	0
1081 – 1095 Long Beach Boulevard	1.20	108	130	43	38	40	0
1332 Locust Avenue	1.00	108	108	41	31	33	0
Broadway & Atlantic – SE Corner	1.38	75	104	24	30	32	0
Willow Street & Caspian Avenue – SW Corner	2.04	30	61	17	18	19	0
Long Beach Boulevard & 19 th Street – NE Corner	0.93	44.6	41	17	12	13	0
			5,199	2,080	1,507	1,612	0

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

Sites Suitable for Housing Development

#	Location	Acres	Units / Acre	Units	Zoning	Current Use	Parcels *
1	World Trade Center (600 West Broadway)	5.61	200	1,122	PD-30 Downtown Core Subarea, Unlimited Height District	Parking Lot	7278-015-044
2	Old State Office Building (245 West Broadway)	2.68	200	536	PD-30 Downtown Core Subarea, Unlimited Height District	Office Building and Parking Lot	2 parcels 7280-022-007, 7280-022-914
3	Broadway & Daisy (North West and North East Blocks)	6.04	75	453	PD-30 Downtown Mixed-Use Subarea, 6 Stories Height District	Parking Lot	52 parcels 7278-019-900 - 7278-019-951
4	Long Beach Boulevard and 1 st Street - North West Corner	2.06	200	412	PD-30 Downtown Core Subarea, Unlimited Height District	Parking Lot	12 parcels 7280-028-021, 7280-023 – 7280-028-026; 7280-028-903, 7280-028-905, 7280-028-906; 7280-028-911 – 7280-028-917
	Long Beach Boulevard and Spring Street – South East				PD-29	Parking Lot Parking Lot	3 parcels 7207-003-052, 7207-003-054, 7207-

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

5	Corner	8.35	44.6	372	Subarea 1 (R-4-N)		003-055
6	Long Beach Boulevard and Willow Street – South West Corner	3.37	108	364	PD-29 Subarea 1 (R-4-U)	Fast Food and Motel	2 parcels 7208-001-003, 7208-001-004
7	Long Beach Boulevard and Broadway - North East Corner	3.53	96	339	PD-30 Downtown Core Subarea, 5 Stories Height District	Parking Lot	5 -15 parcels 7281-017-001, 7281-017-002, 7281-017-004, 7281-017-006, 7281-017-008, 7281-017-009, 7281-017-011, 7281-017-900 - 7281-017-907
8	Long Beach Boulevard and Anaheim Street – South West Corner	2.71	108	293	PD-29 Subarea 1 (R-4-U)	Parking Lot	12 parcels 7272-003-008, 7272-003-009, 7272-003-011, 7272-003-012, 7272-003-013, 7272-003-014, 7272-003-017, 7272-003-020, 7272-003-023, 7272-003-024, 7272-003-025, 7272-003-026
9	Long Beach Boulevard and 6 th Street – North West Corner	3.53	75	265	PD-30 Downtown Mixed-Use Subarea, 100 Feet Height District	Fast Food and Auto Repair	12 parcels 7273-026-001, 7273-026-002, 7273-026-004, 7273-026-006, 7273-026-008, 7273-026-009, 7273-026-011, 7273-026-017, 7273-026-019, 7273-026-020, 7273-026-021, 7273-026-022
10	Long Beach Boulevard and Willow Street – South East Corner	2.18	108	235	PD-29 Subarea 2 (R-4-U)	Retail Rite Aid	3 parcels 7208-003-023, 7208-003-034, 7208-003-035
	Long Beach Boulevard and 9 th Street – South				PD-29	Retail and	10 parcels 7273-017-003, 7273-017-004, 7273-017-012, 7273-017-013, 7273-017-014, 7273-017-015, 7273-017-016, 7273-

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

11	East Corner	2.00	108	216	Subarea 5 (R-4-U)	Parking Lot	017-017, 7273-017-026, 7273-017-027
12	Santa Fe Avenue and Spring Street – North West Corner	4.92	30	148	R-4-R	Private Open Space – Gold Star	7314-005-018
13	1081-1095 Long Beach Boulevard	1.20	108	130	PD-29 Subarea 5 (R-4-U)	Auto Repair	3 parcels 7273-007-012, 7273-007-013, 7273-007-014
14	1332 Locust Avenue	1.00	108	108	PD-29 Subarea 5 (R-4-U)	Vacant Lot	4 parcels 7269-015-028, 7269-015-032, 7269-015-033, 7269-015-034
15	Broadway and Atlantic Avenue – South East Corner	1.38	75	104	PD-30 East Village Mixed-Use Subarea, 4 Stories Height District	Supermarket	7281-021-019
16	Willow Street and Caspian Avenue – South West Corner	2.04	30	61	R-4-R (CCR)	Supermarket	2 parcels 7401-003-001, 7401-003-030
17	Long Beach Boulevard Street – North East Corner	0.93	44.6	41	PD-29 4-R-4N	Vacant Lot and Azteca Bar	5 parcels 7209-009-001, 7209-009-002, 7209-009-003, 7209-009-004, 7209-009-005

* [For individual parcel sizes and General Plan LUD see table on the next pages](#)

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

<u>SITE #</u>	<u>APN</u>	<u>AREA IN SF</u>	<u>GP LAND USE DISTRICT</u>
<u>1</u>	<u>7278015044</u>	<u>245,389</u>	<u>7</u>
<u>2</u>	<u>7280022007</u>	<u>77,737</u>	<u>7</u>
<u>2</u>	<u>7280022914</u>	<u>39,207</u>	<u>7</u>
<u>3</u>	<u>7278019900</u>	<u>3,750</u>	<u>7</u>
<u>3</u>	<u>7278019901</u>	<u>3,749</u>	<u>7</u>
<u>3</u>	<u>7278019902</u>	<u>7,539</u>	<u>7</u>
<u>3</u>	<u>7278019903</u>	<u>2,818</u>	<u>7</u>
<u>3</u>	<u>7278019904</u>	<u>4,985</u>	<u>7</u>
<u>3</u>	<u>7278019905</u>	<u>2,809</u>	<u>7</u>
<u>3</u>	<u>7278019906</u>	<u>2,792</u>	<u>7</u>
<u>3</u>	<u>7278019907</u>	<u>4,986</u>	<u>7</u>
<u>3</u>	<u>7278019908</u>	<u>1,870</u>	<u>7</u>
<u>3</u>	<u>7278019909</u>	<u>4,377</u>	<u>7</u>
<u>3</u>	<u>7278019910</u>	<u>4,364</u>	<u>7</u>
<u>3</u>	<u>7278019911</u>	<u>8,784</u>	<u>7</u>
<u>3</u>	<u>7278019912</u>	<u>3,446</u>	<u>7</u>
<u>3</u>	<u>7278019913</u>	<u>1,798</u>	<u>7</u>
<u>3</u>	<u>7278019914</u>	<u>2,250</u>	<u>7</u>
<u>3</u>	<u>7278019915</u>	<u>4,546</u>	<u>7</u>
<u>3</u>	<u>7278019916</u>	<u>781</u>	<u>7</u>
<u>3</u>	<u>7278019917</u>	<u>3,260</u>	<u>7</u>
<u>3</u>	<u>7278019918</u>	<u>1,548</u>	<u>7</u>
<u>3</u>	<u>7278019919</u>	<u>2,720</u>	<u>7</u>
<u>3</u>	<u>7278019920</u>	<u>5,003</u>	<u>7</u>
<u>3</u>	<u>7278019921</u>	<u>4,135</u>	<u>7</u>
<u>3</u>	<u>7278019922</u>	<u>2,500</u>	<u>7</u>
<u>3</u>	<u>7278019923</u>	<u>3,756</u>	<u>7</u>
<u>3</u>	<u>7278019924</u>	<u>2,854</u>	<u>7</u>

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

<u>SITE #</u>	<u>APN</u>	<u>AREA IN SF</u>	<u>GP LAND USE DISTRICT</u>
3	7278019925	2,492	7
3	7278019926	7,500	7
3	7278019927	2,151	7
3	7278019928	2,805	7
3	7278019929	7,502	7
3	7278019930	1,876	7
3	7278019931	3,752	7
3	7278019932	7,501	7
3	7278019933	5,251	7
3	7278019934	8,580	7
3	7278019935	10,807	7
3	7278019936	68	7
3	7278019937	1,970	7
3	7278019938	2,170	7
3	7278019939	3,362	7
3	7278019940	4,988	7
3	7278019941	23	7
3	7278019942	5,019	7
3	7278019943	5,026	7
3	7278019944	3,747	7
3	7278019945	3,736	7
3	7278019946	7,458	7
3	7278019947	1,655	7
3	7278019948	1,758	7
3	7278019949	2,475	7
3	7278019950	14,000	7
3	7278019951	9,778	7
4	7280028021	5,979	7
4	7280028023	11,999	7

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

<u>SITE #</u>	<u>APN</u>	<u>AREA IN SF</u>	<u>GP LAND USE DISTRICT</u>
4	<u>7280028024</u>	<u>2,652</u>	<u>7</u>
4	<u>7280028025</u>	<u>2,653</u>	<u>7</u>
4	<u>7280028026</u>	<u>2,318</u>	<u>7</u>
4	<u>7280028903</u>	<u>24,984</u>	<u>7</u>
4	<u>7280028905</u>	<u>2,100</u>	<u>7</u>
4	<u>7280028906</u>	<u>8,045</u>	<u>7</u>
4	<u>7280028911</u>	<u>12,459</u>	<u>7</u>
4	<u>7280028913</u>	<u>3,732</u>	<u>7</u>
4	<u>7280028916</u>	<u>3,724</u>	<u>7</u>
4	<u>7280028917</u>	<u>4,973</u>	<u>7</u>
5	<u>7207003052</u>	<u>24,703</u>	<u>7</u>
5	<u>7207003054</u>	<u>12,202</u>	<u>7</u>
5	<u>7207003055</u>	<u>327,085</u>	<u>7</u>
6	<u>7208001003</u>	<u>70,139</u>	<u>7</u>
6	<u>7208001004</u>	<u>76,891</u>	<u>7</u>
7	<u>7281017001</u>	<u>1,251</u>	<u>7</u>
7	<u>7281017002</u>	<u>1,252</u>	<u>7</u>
7	<u>7281017004</u>	<u>3,773</u>	<u>7</u>
7	<u>7281017006</u>	<u>7,501</u>	<u>7</u>
7	<u>7281017008</u>	<u>6,523</u>	<u>7</u>
7	<u>7281017009</u>	<u>7,510</u>	<u>7</u>
7	<u>7281017011</u>	<u>12,539</u>	<u>7</u>
7	<u>7281017900</u>	<u>22,503</u>	<u>7</u>
7	<u>7281017900</u>	<u>26,374</u>	<u>7</u>
7	<u>7281017901</u>	<u>7,534</u>	<u>7</u>
7	<u>7281017902</u>	<u>11,252</u>	<u>7</u>
7	<u>7281017903</u>	<u>12,542</u>	<u>7</u>
7	<u>7281017904</u>	<u>1,254</u>	<u>7</u>
7	<u>7281017905</u>	<u>1,911</u>	<u>7</u>

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

<u>SITE #</u>	<u>APN</u>	<u>AREA IN SF</u>	<u>GP LAND USE DISTRICT</u>
<u>7</u>	<u>7281017906</u>	<u>9,210</u>	<u>7</u>
<u>7</u>	<u>7281017907</u>	<u>7,506</u>	<u>7</u>
<u>8</u>	<u>7273003008</u>	<u>8,568</u>	<u>7</u>
<u>8</u>	<u>7273003009</u>	<u>8,559</u>	<u>7</u>
<u>8</u>	<u>7273003011</u>	<u>8,505</u>	<u>7</u>
<u>8</u>	<u>7273003012</u>	<u>8,482</u>	<u>7</u>
<u>8</u>	<u>7273003013</u>	<u>8,522</u>	<u>7</u>
<u>8</u>	<u>7273003014</u>	<u>8,521</u>	<u>7</u>
<u>8</u>	<u>7273003017</u>	<u>6,634</u>	<u>7</u>
<u>8</u>	<u>7273003020</u>	<u>10,507</u>	<u>7</u>
<u>8</u>	<u>7273003023</u>	<u>14,999</u>	<u>7</u>
<u>8</u>	<u>7273003024</u>	<u>7,391</u>	<u>7</u>
<u>8</u>	<u>7273003025</u>	<u>16,728</u>	<u>7</u>
<u>8</u>	<u>7273003026</u>	<u>11,023</u>	<u>7</u>
<u>8</u>	<u>7273026001</u>	<u>7,612</u>	<u>7</u>
<u>8</u>	<u>7273026002</u>	<u>12,560</u>	<u>7</u>
<u>8</u>	<u>7273026004</u>	<u>22,462</u>	<u>7</u>
<u>8</u>	<u>7273026006</u>	<u>7,457</u>	<u>7</u>
<u>8</u>	<u>7273026008</u>	<u>7,516</u>	<u>7</u>
<u>8</u>	<u>7273026009</u>	<u>7,501</u>	<u>7</u>
<u>8</u>	<u>7273026011</u>	<u>4,982</u>	<u>7</u>
<u>8</u>	<u>7273026017</u>	<u>15,005</u>	<u>7</u>
<u>8</u>	<u>7273026019</u>	<u>17,548</u>	<u>7</u>
<u>8</u>	<u>7273026020</u>	<u>7,486</u>	<u>7</u>
<u>8</u>	<u>7273026021</u>	<u>4,603</u>	<u>7</u>
<u>8</u>	<u>7273026022</u>	<u>23,477</u>	<u>7</u>
<u>8</u>	<u>7208003023</u>	<u>12,309</u>	<u>7</u>
<u>8</u>	<u>7208003034</u>	<u>48,826</u>	<u>7</u>
<u>8</u>	<u>7208003035</u>	<u>34,141</u>	

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

<u>SITE #</u>	<u>APN</u>	<u>AREA IN SF</u>	<u>GP LAND USE DISTRICT</u>
<u>11</u>	<u>7273017003</u>	<u>7,502</u>	<u>7</u>
<u>11</u>	<u>7273017004</u>	<u>7,508</u>	<u>7</u>
<u>11</u>	<u>7273017012</u>	<u>12,459</u>	<u>7</u>
<u>11</u>	<u>7273017013</u>	<u>6,531</u>	<u>7</u>
<u>11</u>	<u>7273017014</u>	<u>4,098</u>	<u>7</u>
<u>11</u>	<u>7273017015</u>	<u>2,399</u>	<u>7</u>
<u>11</u>	<u>7273017016</u>	<u>7,020</u>	<u>7</u>
<u>11</u>	<u>7273017017</u>	<u>5,007</u>	<u>7</u>
<u>11</u>	<u>7273017026</u>	<u>14,957</u>	<u>7</u>
<u>11</u>	<u>7273017027</u>	<u>19,967</u>	<u>7</u>
<u>12</u>	<u>7314005018</u>	<u>214,566</u>	<u>3B</u>
<u>13</u>	<u>7273007012</u>	<u>12,575</u>	<u>7</u>
<u>13</u>	<u>7273007013</u>	<u>12,482</u>	<u>7</u>
<u>13</u>	<u>7273007014</u>	<u>26,468</u>	<u>7</u>
<u>14</u>	<u>7269015028</u>	<u>4,332</u>	<u>7</u>
<u>14</u>	<u>7269015032</u>	<u>2,073</u>	<u>7</u>
<u>14</u>	<u>7269015033</u>	<u>19,260</u>	<u>7</u>
<u>14</u>	<u>7269015034</u>	<u>19,052</u>	<u>7</u>
<u>15</u>	<u>7281021019</u>	<u>60,195</u>	<u>7</u>
<u>16</u>	<u>7401003001</u>	<u>8,405</u>	<u>8R</u>
<u>16</u>	<u>7401003030</u>	<u>80,488</u>	<u>8R</u>
<u>17</u>	<u>7209009001</u>	<u>13,529</u>	<u>7</u>
<u>17</u>	<u>7209009002</u>	<u>6,776</u>	<u>7</u>
<u>17</u>	<u>7209009003</u>	<u>6,764</u>	<u>7</u>
<u>17</u>	<u>7209009004</u>	<u>6,767</u>	<u>7</u>
<u>17</u>	<u>7209009005</u>	<u>6,785</u>	<u>7</u>
<u>17</u>	<u>7209009004</u>	<u>6,767</u>	<u>7</u>
<u>17</u>	<u>7209009005</u>	<u>6,785</u>	<u>7</u>

Word Trade Center - 3rd at Main Street (#1)



Old State Bldg. at Broadway and Pacific (#2)



NW Corner at Broadway & Daisy (#3)



NE Corner at Broadway & Daisy (#3)



APPENDIX B – HOUSING DEVELOPMENT CAPACITY

NW Corner at LB Blvd & First (#4)



SE corner of Spring at LB Blvd. (#5)



SW corner of LB Blvd. at Willow (#6)



SW corner of LB Blvd. at Willow



NE corner LB Blvd. at Broadway (#7)



SW corner LB Blvd. At Anaheim St. (#8)



APPENDIX B – HOUSING DEVELOPMENT CAPACITY

NW corner LB Blvd. at 6th St. (#9)



SE corner of LB Blvd. At Willow (#10)



SE corner LB Blvd. at 9th Street (#11)



Gold Star Manor/Santa Fe at Spring (#12)



APPENDIX B – HOUSING DEVELOPMENT CAPACITY

1095 Long Beach Boulevard (#14 13)



1081 LB Blvd. (#14 13)



APPENDIX B – HOUSING DEVELOPMENT CAPACITY

1332 Locust Ave. (~~#15~~ 14)



SE corner of Broadway at Atlantic (~~#16~~ 15)



Willow and Caspian –
The Willow Market (#17 16)



NE corner LB Blvd. At 19th St. (#18 17)



APPENDIX B – HOUSING DEVELOPMENT CAPACITY

Demonstration of Density Achieved

Zoning	Max Allowed Units/Acres	Actual Project and Density Achieved within Same Zone
PD-29 Subareas 1 and 4 R-4-N	44.6	Olive Court Project at 1870 Long Beach Boulevard was completed with 58 units on 104 acres which equates to 41 units/acre
PD-29 Subareas 2 and 5 R-4-U	108	A project at 838 Pine Avenue was completed with 83 units on 0.7 acres which equates to 118 units/acre
PD-30 Downtown Core Subarea, Unlimited Height District	No Max	Press Telegram Project at 604 Pine Avenue is entitle for 542 units on 206 acres which equates to 208 units/acre
PD-30 Downtown Mixed Use Subarea, 6 stories Height District	75	Lyon Project at 421 West Broadway is building 294 units on 3.6 acres which equates to 80 units/acre
PD-30 Downtown Core Subarea, 5 Stories Height District	96	Lyon Project at 421 West Broadway is building 294 units on 3.6 acres which equates to 80 units/acre
PD-30 Downtown Mixed-Use Subarea, 100 Feet Height District	75	Lyon Project at 421 West Broadway is building 294 units on 3.6 acres which equates to 80 units/acre
PD-30 East Village Mixed-Use Subarea, 4 Stories Height District	75	Lyon Project at 421 West Broadway is building 294 units on 3.6 acres which equates to 80 units/acre
<u>PD-30 Downtown Core Subarea, Unlimited Height District</u>	<u>No Max.</u>	<u>A project at 777 E. Ocean Blvd. is entitled for 221 units on a 0.8 acre site which equates to 275 units per acre</u>
<u>PD-30 Mixed Use Subarea, 6 Stories - Height District</u>	<u>75</u>	<u>The Gateway on Fourth, a project at 350 Long Beach Blvd. is under construction with 82 units on 1.15 acres, which equates to 71 units per acre</u>

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

PD-29 Subarea 3 – R4N	44.6	<u>A project at 2355 Long Beach Blvd. is entitled for 46 units on a 0.8 acre site. (This affordable project achieved a density of 58 units to the acre with a 30% density bonus).</u>
PD-6 Downtown Shoreline Subarea 4	100	<u>A project at 150 E. Ocean Blvd. is entitled for 216 units on a 2.2 acre site.</u>
R-4-R	30	<u>The Neo Zoe Project at 1500 Pine Avenue has been completed with 22 units on 0.7 acres, which equates to 31 units per acre. Of the 22 units, 5 are affordable to low income households and 12 are affordable to moderate income households.</u>

Of the 17 sites suitable for future housing development nine sites have structures on them.

- Site #2 consists of an old 3-story State Office Building on a one-block site where half of the site is used for surface parking. This site is surrounded by 5, 8 and 14 story buildings in an unlimited height district of the Downtown Core and is considered a prime redevelopment site.
- Site #6 currently hosts a drive through fast food restaurant and an old motel, both of which are considered marginal uses at a key corner within a 5 minute walk to a light rail passenger station in an area zoned for Urban High Density Residential uses (R4U).
- Site #9 has one-story fast food and an old auto repair shop located along the light rail line in an area that allows up to 100-foot high developments. Hence, its current uses are considered marginal and redevelopment is highly encouraged.
- Site #10 has a marginal one-story retail outlet with surface parking in the R4U - Urban High Density Residential District which is intended to support employment activity centers with adjoining workforce housing. This site is also within a 5-minute walk of a light rail station.

APPENDIX B – HOUSING DEVELOPMENT CAPACITY

- Site #11 currently hosts a small, marginal, one-story commercial building with surface parking in the R4U - Urban High Density Residential District which is intended to support employment activity centers with adjoining workforce housing. This site is also within a 5-minute walk of a light rail station.
- Site #13 currently hosts an old, vacated auto-repair use on a site zoned R4U - Urban High Density Residential to encourage redevelopment to higher and better uses along this light rail route. This site is only two blocks from the Anaheim light rail station.
- Site #15 consists of an old, obsolete and undersized grocery store and surface parking lot which shares the block with a high rise residential tower. Located in the East Village area of the Downtown, this site is zoned to encourage redevelopment to a more intense/dense development that includes housing.
- Site #16 also has an undersized, marginal grocery store surrounded by surface parking. Located in the village center area of the Westside Redevelopment Area, this site is zoned to accommodate residential uses at moderate density to support this neighborhood center.
- Site #17 is currently occupied by a small, old tavern siting on a corner lot within a 5-minute walk to the Blue Line light rail station. This is considered a very marginal use and the R4N zoning applied to the property has been applied to facilitate recycling this site to a new multiple family housing opportunity.