Written Public Comment Received And Response

(will be included as part of APPENDIX D)



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November 30, 2016

Alem Hagos, Grants Administration Officer Long Beach Development Services 333. W. Ocean Blvd., Third Floor Long Beach, CA 90802

Re: City of Long Beach Assessment of Fair Housing Draft Report

Dear Mr. Hagos,

Habitat for Humanity of Greater Los Angeles (Habitat LA) commends the Long Beach Development Services for their work in identifying fair housing issues that obstruct access to safe and affordable housing in the City of Long Beach. As a long standing stakeholder in the Long Beach housing community, we appreciate the opportunity to contribute to this report through a one-on-one interview, community workshops, and by providing comments on the draft assessment. Additionally, we applaud Mayor Robert Garcia for his efforts to highlight the need for more fair and affordable housing in the City of Long Beach.

Upon review of the draft report, Habitat LA recommends the following revisions and additions to Section IV. Fair Housing Goals and Priorities. It is our belief that the inclusion of the following recommendations will grow opportunities for affordable homeownership and provide measurements by which to gauge success.

- Goal 1, amend bullet one in the Metrics, Milestone and Timeframe for Achievement column to read (p. 146), "By 2022, in line with the City's Housing Element goals and specifically, in line with the City's Housing Action Plan, the City will continue to implement a comprehensive strategy to preserve and create affordable housing stock in the City by increasing housing supply by 465 units, of which at least 30% will be affordable home ownership units. Target funds to financially assist qualified, first-time homebuyers in the purchase of their home in qualified census tracts."
- Goal 5, amend bullet point three in the Metrics, Milestone and Timeframe for Achievement column to read (p. 150), "By 2022, provide opportunities for linkages and new allocations of city resources to down-payment assistance and second mortgage assistance programs for at least 100 first-time homebuyers annually with incomes under 80% AMI."

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- Goal 5, amend bullet point four in the Metrics, Milestone and Timeframe for Achievement column to read (p. 150), "By 2022, partner with community agencies, such as Habitat for Humanity, *to create a strategy that will increase the homeownership rate annually together with financial models.*"
- Goal 5, amend bullet point five in the Metrics, Milestone and Timeframe for Achievement column to read (p. 150), "By 2022 limit further concentration of cash checking, payday lender businesses, *liquor stores, and bars* in the City through implementation of location restrictions and special development standards in 21.45.116 and 21.52.212 of the Long Beach Municipal Code."
- Goal 6, amend bullet point ten in the Metrics, Milestone and Timeframe for Achievement column to read (p.151), "Work in collaboration with the City's First Time Homeownership Program and such partners as *Habitat for Humanity* and Operation Hope to promote the HCV Homeownership Program, and homeownership opportunities."
- Lastly, we recommend the City of Long Beach include resources to allow existing homeowners to conduct critical home repairs.

Again, we thank the Long Beach Development Services and the City of Long Beach for their efforts to identify barriers to fair and affordable housing and solutions to mitigate their impact on housing in Long Beach. Habitat LA is ready and available to work with the city to implement the fair housing goals outlined in the Assessment of Fair Housing.

Sincerely,

Enin Rank

Erin Rank President & CEO

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CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 West Ocean Blvd., 4h Floor Long Beach, CA 90802 Phone: 570.5237 Fax: 570.6205

December 8, 2016

Erin Rank, President & CEO Habitat for Humanity Greater Los Angles 8739 Artesia Boulevard, Bellflower, CA 90706

Re: City of Long Beach Assessment of Fair Housing

Dear Ms. Rank:

Thank you for your review of the City of Long Beach Assessment of Fair Housing. We appreciate your organization's continued participation in the City's various housing and community development planning efforts. With regard to your comments, we offer the following responses:

1. Amend Goal 1 to include 30% of affordable ownership units: Currently, the City has limited funding for affordable housing. The numeric goals established in the AFH are consistent with the City's Housing Action Plan, which focuses on the use of Housing Asset Funds and HOME funds for the expansion of affordable housing opportunities in the City. These are the two major funding sources available to the City.

The City's overall affordable housing strategy is to maximize the efficiency of these funds to provide the most number of affordable units to benefit those who are currently underserved and most in need of assistance. Given the regulatory requirements governing these funding sources, a significant portion of these funds must benefit households with less than 50 percent AMI, making these funds inefficient for ownership housing that requires deep subsidies.

- 2. Amend Goal 5 to allocate resources for downpayment assistance and second mortgage assistance: As noted above, the currently available resources to the City are Housing Asset Funds and HOME funds. Both funding sources are required to focus on households with less than 50 percent AMI and therefore not efficient for homeownership assistance.
- 3. Amend Goal 5 to include the creation of a strategy for increasing homeownership rate: Please see responses above.
- 4. Amend Goal 5 to limit concentration of liquor stores and bars: The goal to limit the concentration of cash checking and payday lender businesses relates to encouraging individuals to utilize conventional financial institution, promoting financial management skills, and safeguarding against predatory lending and frauds. These are equal access to opportunities issues, which are fair housing concerns. However, the concentration of liquor stores and bars are not directly related to fair housing concerns and are already addressed in the City's Zoning Code as land use compatibility issues.

Ms. Erin Rank December 8, 2016 Page Two

- 5. Amend Goal 5 to specifically identify Habitat for Humanity as a community partner in First Time Homeownership Program: The City appreciates the continued efforts of Habitat for Humanity in expanding affordable housing opportunities in the City.
- 6. **Include resources to allow homeowners to conduct critical home repairs:** The City continues to offer the Home Owner Rehabilitation Loan and Home Improvement Rebate programs.

The City appreciates the dedication of your organization in providing affordable housing opportunities in Long Beach. We welcome your continued participation in our housing and community development planning efforts.

Sincerely,

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Alem Hagos Grant Administration Officer Department of Development Services