

Alex Medina

From: Nazir Abuyounes <nazir@wearelbre.org>
Sent: Thursday, December 19, 2024 10:36 AM
To: PlanningCommissioners; Stephanie Harper; Eljio Sandoval; CityClerk
Cc: Andre Donado
Subject: Public Comment for Agenda Item #4 - December 19th, 2024 Planning Commission Meeting
Attachments: Public Comment for Item 4_Inclusionary Housing Update.pdf

-EXTERNAL-

Dear Members of the Long Beach Planning Commission,

Please find attached a joint letter from the Housing for All Long Beach Community Land Trust and Long Beach Residents Empowered with comment on Item 4, updates to the Inclusionary Housing Ordinance, on the December 19th, 2024 Planning Commission Agenda. Please let me know if you have any questions. We look forward to collaborating on this item.

Best,
Nazir

Nazir Abuyounes (they/he)

HFALBCLT Director

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December 19, 2024

Members of the Long Beach Planning Commission
411 W Ocean Blvd.
Long Beach, CA 90802

**RE: Public Comment for Agenda Item #4 - Updates to the Long Beach
Inclusionary Housing Ordinance**

Dear Members of the Long Beach Planning Commission,

We are encouraged by the expansion of Inclusionary Housing citywide, to increase access to affordable housing and homeownership to those most in need. We hope innovative policies like these can bring us closer to our vision of a Long Beach where we can live, work, attend schools, and maintain life-sustaining connections in our community regardless of our race or income.

The Housing for All Long Beach CLT (HFALBCLT) and Long Beach Residents Empowered (LiBRE) write this letter to share support for the recommendations that Long Beach residents and community organizations have shared around the expanded Inclusionary Housing Ordinance and to include some recommendations to ensure that affordable housing development in Long Beach is accessible and centers community ownership and input.

Ensuring Fair Access to Affordable Units

HFALBCLT and LiBRE have a strong interest in ensuring fair access to affordable units. As community-led organizations, we have had extensive communication with residents who share that they do not see the affordable units reaching their intended population.

Community land trusts are well positioned as community-led organizations to assist in ensuring the affordable units are reaching the community. Several cities have empowered community land trusts to serve as property managers for the inclusionary units. This is most notably successful in Irvine where the Irvine CLT serves as the property manager of all the inclusionary affordable units developed. A CLT can serve as the contracted property manager of the inclusionary units, and is in the best position to outreach to and place residents in units, ensuring that the affordable units are reaching the intended population.

Enhancing Alternative Compliance

The inclusionary zoning policy should drive developers to choose the on-site option whenever possible. However, if off-site or alternative compliance is permitted, we hope that the outcomes benefit the community and those most in need.

We appreciate the recommendation to expand city use of in-lieu fees to be used for a broader range of affordable housing units, including CLTs. We ask that the ordinance go a bit further by prioritizing CLTs as recipients of the in-lieu fees, or allocating a set aside of the fees annually to CLTs. This would better support the inclusionary housing policy's goal of developing permanently affordable housing for those most in need.

As it currently stands, an applicant may dedicate land to the City or a local nonprofit housing developer. We ask that alternative compliance prioritize community centered efforts and that any land dedication be prioritized to community land trusts. Community land trusts carry the purpose of the inclusionary zoning policy, to provide permanently affordable housing with access to the same types of resources, amenities, and characteristics of market rate housing. Nonprofit housing developers building affordable housing developments may not be committed to the same permanent affordability and community centered principles.

Although land dedication may benefit the community, in order to meet the goal of creating more affordable units, ideally the developer would build the off-site units—transferring ownership of the units or management of the units via a master lease to a CLT. The management of either rental properties, or the sale or resale of ownership units by a CLT would ensure fair access to those units and permanent affordability. If a land dedication were to be made to a CLT, we ask that the City waive the prohibition on accessing city funding for the development of those off-site units.

Eliminating Developer Hardship

Eliminating the developer hardship exemption ensures that more of the intended affordable housing units are built. This provision is unnecessary, as residential developments with nine or fewer units are already exempt from compliance. Many inclusionary housing policies have successfully removed similar exemptions in order to prioritize the creation of affordable housing.

Thank you for the opportunity to share these recommendations for a stronger, community-centered Inclusionary Housing Ordinance. We are encouraged by the outreach to the community and incorporation of community feedback in the ordinance.

We look forward to collaborating with the City through the exploration and implementation of these recommendations.

Sincerely,

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Director

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