



Building Healthy Communities: Long Beach

920 Atlantic Ave., Suite 102 Long Beach CA 90813

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Long Beach Planning Commission
CC: Mayor Garcia and Long Beach City Council

Comments on the Draft Land Use and Urban Design Elements of the City's General Plan

Building Healthy Communities: Long Beach (BHCLB) Environmental Health Work Group (EHWG) has been actively involved in the development and refinement of the Land Use Element (LUE) and Urban Design Element (UDE). Collectively, our coalition has pursued stronger language in support of sustainable and equitable communities, in particular the inclusion of "Green Zones" and affordable housing for low-income working families in the LUE (Implementation Measure [IM] LU-M-64).

We have met with City staff on several occasions, reviewed and discussed the contents of earlier versions of the draft documents, and made suggestions for specific changes, many of which are reflected in the current draft.

While we are pleased with the changes that have been made to date, we have attached suggested revisions for specific pages, including the addition or strengthening of implementation measures. These additional comments and suggestions are provided in the attachment to this letter. With the inclusion of these suggestions, we would be supportive of adopting the LUE and UDE.

The LUE and UDE are critical planning documents, providing a long-range vision for development and investment in the City. The extended process for successive iterations to produce the current draft documents has included extensive public outreach, from the Community Clusters and Community Festivals, to regular and special meetings with a wide range of community and neighborhood associations, the Planning Commission and City Council.

We have the following general comments:

The City Needs a Long Range Land Use Plan

The City began the process for updating the General Plan in 2004. There was a great need for a comprehensive long range land use plan then, and that need has only grown over the intervening 13 years. During that time, the City has updated the Downtown Plan, Midtown Plan and the Southeast Area Specific Plan without benefit of a citywide long-range land use plan. During that extended period, the City spent billions of dollars on capital improvement projects, built new public safety facilities, and made hundreds of other important decisions without a long-range land use plan. The City experienced the Great Recession, periods of substantial growth and change in some neighborhoods. We've experienced ever increasing rents, displacement of long-term residents who are primarily low income residents of color, and sky rocketing sale prices of homes. This is coupled with the entirely new paradigm of online retailing and the creation of on-demand ride-hailing services that are rapidly altering land use and lifestyle patterns without an update to the long-range land use plan. The time to update the Land Use Element has come, and we urge its adoption with our suggested revisions.

Implementation is the Key

The vision provided by the LUE and UDE about the future of the City strongly reflects the collective values of the community. But shared vision is not enough. Implementation of the LUE and UDE will require updating the Chapter 21 of the City's Municipal Code (the Zoning Code) as well as adoption of a number of focused land use plans,

policies and ordinances on a wide variety of subjects ranging from tenant protection policies, anti-displacement policies and policies that preserve and create affordable housing. Currently, Long Beach has no tenant protection policies in place, no anti-displacement measures in place, no policies to preserve and create affordable housing and no local, dedicated revenue source for affordable housing. We cannot continue to grow as a City, in a healthy and equitable manner, if we do not adopt policies and plans that protect our existing residents who make up the diverse fabric of our great City.

The City recently initiated updates to other components of the General Plan, including the Climate Action and Adaptation Plan, the Noise Element, and supporting policies and studies. The City has also noticed an RFP for a consultant to study an inclusionary housing policy for the City. However, the parameters of this potential policy have not been shared with the community and the details of this policy (i.e., who benefits and by how much) are critical. The City has been informed by the Southern California Association of Governments (SCAG) that it needs to produce 5,440 affordable units between 2014 - 2021 to meet the existing housing needs of Long Beach residents. (This is referred to as the City's affordable RHNA number.) Unfortunately, the City is nowhere near meeting this goal. Since 2014, the City has produced approximately 500 affordable units, which is nowhere near its RHNA number of 5,440 affordable units. Therefore, the City needs to adopt a robust inclusionary housing policy that sets aside a significant amount (20%) of new apartments and condominiums for Very Low income households. Every part of the City should be subject to these requirements. It is also critical that this policy be adopted at the same time as increased density is approved, as recommended by the LUE. If increased density is approved first, land values are increased for developers with the stroke of a pen without extracting any community benefits, such as inclusionary housing for Very Low Income families. The City should not repeat the mistakes of the Downtown Plan, which increased density without obtaining any community benefits for impacted residents. The Downtown Plan has resulted in massive gentrification and displacement of long term low income residents of color. Furthermore, and to be abundantly clear, density is not a proxy for affordable housing. Affordable units are only built when developers are required to do so, through policies such as inclusionary housing. Density alone does not bring affordability.

In addition to including the specifics of an inclusionary housing policy in the LUE, the LUE should also include anti-displacement protections such as a "No Net Loss" policy. A No Net Loss policy would require developers to replace all affordable units that are demolished or converted to make way for a new development. Importantly, "affordable units" should be defined to include not just covenanted units or units with affordable rents, but also any unit that is "occupied by a low or moderate income household". This definition of affordable unit is utilized in state density bonus law as well as housing policies in the City and County of Los Angeles. Defining affordable units to include units occupied by low or moderate income households is the current best practice for housing policy.

With a No Net Loss policy, after a developer determines the number of existing affordable units in a development, the City must then require that any new development on that site include this number of replacement units. Importantly, this requirement would be in addition to any inclusionary housing requirement. Finally, with a No Net Loss policy, the policy must define demolition to include substantial rehabilitation work so that developers don't have a loophole for avoiding replacement housing obligations by engaging in major rehabilitation work.

Adoption of the LUE and UDE with our suggested revisions will provide a foundation for all of these other plans and policies to move forward. It is difficult to see how these other important efforts can proceed without the guidance from LUE in any meaningful way.

Complete Neighborhoods

One of the primary founding principles of the 10-year Building Healthy Communities initiative, initiated in Long Beach in 2010, was to rectify the significant health and life expectancy discrepancies from West, North and Central, where life expectancy can be up to 7 years shorter than residents from the Eastside. The EHWG is in strong support of the policy discussion in the LUE, most especially the Sustainability and the Natural Environment (LUE Pages 47-50) and Health Communities sections (LUE Pages 51-54). The Sustainability section includes references to the Sustainable City Action Plan and climate change and sea level rise. The Healthy Communities section references the Healthy Communities Policy adopted by City Council in 2014, the development of which was supported by

BHCLB. The narrative promotes active living, access to healthy foods, and improving environmental justice, all primary focus areas of the EHWG collectively and its collaborative members. The comments EHWG has at this point in the process have to do with expanding and strengthening Implementation Measures to provide more direction and assurance that the sustainability and healthy community policies will become meaningful and effective during the planning horizon of the LUE.

The ultimate goal of this effort to improve the quality of life for all residents, workers and visitors in Long Beach. The focus of this effort will be to ensure that all neighborhoods are complete (IM LU-M-45), providing a full range of daily needs activities, including access to a wide range of goods and services, healthy foods, recreational and suitable employment opportunities. Only when all neighborhoods provide a healthy and comprehensive range of services will the historic health disparities.

Targeted Economic Development

The EHWG collaborative supports sustainable targeted economic development, particularly affordable housing and the reduction of exposure to environmental hazards of all types. This means that new residential development should not be built in areas where pollution and other environmental conditions adversely impact healthy living, including the Port (IM LUM-50), and industrial areas and near freeways and heavily traveled roadways (IM LU-M-51).

At present, too high a percentage of Long Beach residents are renters paying too much of their income for basic housing and so many residents are on the verge of homelessness. More housing at all socioeconomic levels, especially at the most affordable levels and for homeless and transitional housing, is needed.

Growth in significant growth, transit-rich and infill areas (IM LU-M-21 through LUM-31), and economic development (IM LU-M-13 through LU-M-20) would help provide a wide range of affordable housing options (IM LU-M-41 through LU-M-44).

The LUE should include more specific policies and implementation measures that will work to create truly affordable housing to our lowest income residents, and a better match between jobs and the employability of Long Beach residents as part of the economic development efforts.

Sustainable Growth and Equitable Development that Encourages Complete Neighborhoods, Healthy Lifestyles and Affordable Housing

EHWG supports sustainable and equitable development, a City that thrives for all its residents, workers and visitors. However, for far too long, development has been planned and built in only some areas of the city, burdening people in those areas with congestion, pollution and lower standards of living. Some of this was legislatively prescribed through covenants, conditions and restrictions that were racially motivated. These provisions were morally wrong when they were written, but their influence has endured. The LUE should seek to correct these historic disparities and result in improved quality of life for all of Long Beach. In order to rectify these discrepancies, more investment in historically disadvantaged communities and communities of color will be required in the coming decades.

Development efforts should be focused on provided complete neighborhoods, making it easier for residents to live healthier lifestyles. Affordable housing production should keep up with demands. The City's policies and spending priorities should be in line with creating equity and accommodating growth where it is envisioned to occur in the LUE.

Urban Design Guidance is Critical

The UDE provides important urban design guidance for the placetypes and street types. This discussion should be augmented with more guidance for how taller or denser projects can best be integrated into the existing urban fabric, particularly for mid- and high-rise development outside of the Downtown Placetype.

Active Transportation

The UDE provides important design guidance for pedestrian, bicycle and transit infrastructure (UDE Page 84-85). The EHWG and several of its collaborator members focus their efforts on improving the pedestrian and bicycling environment in Long Beach, and strongly support an efficient and effective transit network. This design guidance is helpful, but no corresponding implementation measures are provided in Chapter 6 to support these strategies. Strategy No. 60 (UDE Page 93) calls for the creation of standards for street wall design. To be most effective, this effort should be coupled with street design standards called for in the adopted Mobility Element (Page 122, MOP IM-1).

Create, Restore and Preserve Open Space

The LUE states that the City recognizes the need for a wide variety of parks and open spaces within certain neighborhoods, particularly in the north, central and western portions of Long Beach. This Land Use Plan focuses on creating and restoring open spaces, with priority in underserved areas. This includes large portions of West and North Long Beach where many of our partners have been working in, including the Terminal Island Freeway, Shoreline Drive/Shoemaker Bridge, SCE right-of-way, railroad right-of-ways and adjoining industrial properties.

The SCE corridor in East Long Beach is currently "open space" while it is "light industrial" or "right of way" in North and West Long Beach. The LUE consolidates flood control facilities, electricity transmission corridors and other infrastructure as "open space" which could have substantial benefits for West, North and Central Long Beach. While it does not immediately convert these spaces into parks or urban farming opportunities, it could preclude new tenants from setting up new industrial uses, freight operations or truck parking. The revised LUE maps remove Caltrans facilities [freeways] from that "open space" designation which should be returned to the original designation.

Convert Industrial Edges to Neo-Industrial Uses

The LUE states that Industrial uses remain relatively important in Long Beach, but economic trends indicate that the local economy is shifting toward knowledge-based and service-based industries. Professional services employment is rapidly growing, along with a slow emergence of high technology and creative companies known for introducing innovative approaches and products. Traditional manufacturing industries are being transformed as large-scale plants are diminishing or being phased out and smaller local-serving manufacturers fill the void. The City has established the Neo-Industrial PlaceType to help transition outdated and underutilized manufacturing and industrial sites to higher-value, better employment opportunities. For added flexibility, the Neo-Industrial PlaceType allows some live/work opportunities for artists, craftspeople and other creative entrepreneurs. This PlaceType also functions as a buffer between heavier industrial enterprises and residential neighborhoods.

We support this direction as it reduces land-use conflicts between existing adjacent industrial and residential uses by de-intensifying the industrial uses. There is also the opportunity to introduce housing (including affordable) development sites and park opportunities where appropriate. This section should be revised to include consideration for other uses including residential as it could in some cases lead to more rapid land-use change too.

Promote Appropriate Infill Development

The LUE promotes appropriate infill development, particularly along corridors and centers that have established transit facilities. Long Beach will encourage development of vacant or underutilized land located in built-up areas. New infill development should be carefully planned to minimize impacts and to complement surrounding development. Appropriate infrastructure and supporting services must be adequate or in place to serve new infill development without sacrificing services to the existing population. The Multi-Family, Neighborhood-Serving Center and Transit-Oriented Development PlaceTypes provide opportunities for infill development in strategic areas, with policies aimed at protecting established low-density neighborhoods. The Mobility Element promotes improved transit services where it will complement infill development.

The new areas for multi-family/mixed-use development as well as increased height/density has been among the most contentious items in the plan. While the revisions to the LUE will include reduced densities consideration should remain for transit rich, walkable and amenity dense portions of Long Beach outside of Downtown and Midtown, including around the medical centers and college campuses.

Conclusion

The EHWG is encouraged by the evolution of the LUE and UDE, and provide these comments and urge their inclusion into the final draft that goes to City Council for adoption. With these changes, the EHWG would be supportive of adoption of these policy document. Without them, we will remain neutral to their adoption.

We look forward to continuing to work with the City on implementation of the policies, strategies, and the subsequent programs and planning efforts that will move us closer to the shared vision provided by these documents.

Thank you for the opportunity to comment on these important vision and policy documents. Feel free to contact us if you have any questions or would like to meet to discuss how to better incorporate healthy community policies into these long range development plans for the City, and implementation of the subsequent policies and programs the documents call for.

Sincerely,

AMY CABRERA RASMUSSEN

*Chair, Environmental Health Working Group
Building Healthy Communities: Long Beach*

On behalf of:



Attachment

Specific Suggestions/Comments to Amend the Land Use Element

Page	Comment
130	IM LU-M-42 calls for an inventory of vacant lots. Just knowing where vacant lots are does not provide the direction and vision to make good use of those lots. Temporary or interim uses such as urban farms, parks, pop-up retail spaces and other uses that support healthy lifestyles should be encouraged on vacant lots.
130	IM LU-M-43 should be expanded upon in two critical ways: First, the City should add a commitment to adopting a city-wide inclusionary housing ordinance that will set aside 20% of all new apartment and condominium units, on-site, as Very Low Income units with 55 year covenants. Second, the City should add a commitment to adopting a No Net Loss policy, as explained earlier in this comment letter. Moreover, both of these must be adopted before density is increased in the City, pursuant to the LUE, through the updating of the City's zoning code.
131	IM LU-M-53 encourages joint use of recreational spaces at school properties, outside of school hours. Progress on this effort has been very slow in recent years. More specific goals and deadlines are needed to implement this initiative.
131	IM LU-M-56 calls for more incentives for green energy and technologies. Since the City is currently considering options to pursue community choice energy for electricity and a higher share of clean energy production for the City's electrical needs, the policy should be updated.
134	IM LU-M-78 calls for demonstration streetlet projects along Long Beach Boulevard. There has been a demonstration project along Long Beach Boulevard, and others could be attempted as part of the nearly completed North Long Beach Open Space Plan, for instance. The IM should be updated to reflect broader implementation of possible streetlets.
134	IM LU-M-83 encourages more trees be planted in the City. Development of a more aggressive urban forestry plan would promote a range of benefits, including slowing traffic along tree-lined streets, providing more shade to improve walkability and counter the heat island effect, and sequestering carbon from the atmosphere as part of climate change adaptation efforts. The language should be clarified and strengthened. The UDE, however, does provide implementation for a street tree master plan (UDE Page 93, Strategy No. 61), and should be cross-referenced.
134-135	IM LU-M-85 calls for creative provision of temporary open space and IM LU-M-86 calls for creative use of vacant properties. This effort is vital to providing open space in West, Central and North Long Beach, which is highly underserved by park space per capita when compared with the Eastside. This effort should be prioritized.
135	IM LU-M-87 is overly specific for an implementation of the General Plan, applying to only one situation, and should be broadened through language in the UDE about how new or expanded parks should be designed adjacent to existing residential areas.
135	IM LU-M-93 calls for sustainable drainage design features in the development of streets and parking lots. Creation of street design standards, as called for the adopted Mobility Element (Page 122, MOP IM-1), should include drainage features that slow time of concentration and reduce pollution load from runoff as well as provide groundwater infiltration where appropriate.

Specific Suggestions/Comments to Amend the Urban Design Element

Page	Comment
27	Policy UD4-4 suggests providing walking loops denoted by distance. Experience has shown that noting average walking time is a greater encouragement for walking than distance.
27	Policy UD5-2 provides a clear language about the need for housing opportunities for all income levels. This policy is strongly supported, and should be complemented by a statement about creating complete neighborhoods, where a full range of daily needs, goods and services, including healthy options, are available in all neighborhoods.
68-75	Considering how much consternation about height and density has been expressed during recent public input, some guidance for the introduction of infill mid-rise and high-rise development should be provided, including addressing issues such as shadowing of adjacent properties and privacy intrusion. The Placetypes chapter includes substantial discussion about design transitions within and between various land uses within the placetypes and where more than one placetype abuts another. This is very helpful, but should be augmented with additional design guidance for the introduction of larger structures and complexes into the existing urban fabric to minimize adverse impacts.