



May 31, 2021

City of San Clemente City Council
City Hall, 100 Avenida Presidio
San Clemente, California

Dear Mayor Ward, Mayor Pro Tem James, and Councilmembers Ferguson, Knoblock, and Duncan,

We are writing to you today about the Draft of the Housing Element (HE). The San Clemente Affordable Housing Coalition (SCAHC or the Coalition) is an organization of individuals who are committed to improving the opportunity and choices for Affordable Homes in San Clemente for those who live and work in our city.

Our team has had a chance to review this Draft HE and would like to now add to comments already presented by Chair Kathy Esfahani in a letter/email dated May 18, 2021. We appreciate your time in listening to our concerns. We realize the Draft HE is a work in progress.

These comments focus on three sections/populations of the 6th Cycle Draft HE:

- Seniors
- Persons with Disabilities
- Homeless Persons

We wish to **comment on certain elements to hopefully provide clarity, and in some cases accuracy, on some assertions currently in the Draft Element.** In some cases we comment in order to ensure that a proper picture is “painted.”

1) Senior Housing Needs: The city’s report states: “The elderly, particularly those with disabilities, may face increased difficulty in finding housing accommodations. A senior

on a fixed income can face great difficulty finding safe and affordable housing. Subsidized housing and federal housing assistance programs are increasingly challenging to secure and often involve a long waiting list.”

a) Cost burdened senior households: Table 2-6 of the Draft Housing Element shows that approximately 61% of Senior renter Households are paying greater than 30% of their income on housing, and approximately 35% are paying greater than 50% (severely cost burdened). Among all Senior Households (renters and owners) with extremely low and very low incomes, greater than 1300 households total, 65% are paying 50% or more of their income on housing. A significant number of Senior households in San Clemente are severely burdened by housing costs.

b) Homelessness among seniors: Seniors are the fastest growing group of people experiencing homelessness. In the last full countywide Point in Time Count (2019), seniors experiencing homelessness were about 10% of the total, and there were a reported 78 homeless seniors in the South Service Planning Area (SPA). In the South SPA only 1/3 of homeless seniors were considered sheltered, whereas in the other SPAs 50% of homeless seniors were sheltered. There is reason to believe that the homeless senior population in San Clemente is growing. A recent count by Coalition members of people experiencing homelessness in San Clemente counts almost 20 seniors experiencing unsheltered homelessness - which, according to our research, is approximately 20% of homeless residents - and we know this count was not exhaustive.

c) “Affordable” senior developments: Table 2-31 “Senior Housing Developments” lists 420 units of Senior residences, stating that 270 have “renter qualifications not to exceed anywhere from 50 percent to 80 percent of median income.” Of all of these units available in the city, only about a quarter of them are affordable to people living on the average income from Social Security or Supplemental Security Income (SSI).

Most units at Cotton’s Point (45 of 71) and all of the units at Vintage Shores (122), for example, have minimum income requirements starting at about \$2800 per month, which is practically twice what many seniors have. Only the 72 units at The Presidio and about 30 at Cotton’s Point are the kind where the rents are based on a percentage of income and thus would be affordable to seniors living on income from SSI or the average Social Security.

d) Waitlists: The waitlists at all of the affordable developments are long. For the

most affordable units at Vintage Shores, for example, the waitlist is six years. The waitlist for the affordable units at Cotton's Point that don't have additional requirements (n= 45) has been closed since 2018 and 200 people remain on the list at present. The Presidio has approximately 60 people on the waiting list at present.

e) Conclusion: The city's own data (Table 2-3) shows us that the Senior population is the fastest growing age group in San Clemente. The percentage of the city's residents aged 55-64 grew 3.6% in the last eight years, and the percentage of those 65 and up grew 4.2%. When discussing the needs of people with disabilities (27.2% of seniors) (43.2% of those disabled are seniors) the draft states: "Since seniors have a much higher probability of being disabled, the housing and service needs for persons with disabilities should grow considerably commensurate with senior population growth." And yet we have only added the 77 units at Cotton's Point in the last eight years, and, as discussed, most of those units are still not affordable for households with the lowest incomes, and have very long waitlists. We know that "A senior on a fixed income can face great difficulty finding safe and affordable housing." We know that there are thousands of senior households in San Clemente who are severely cost burdened, and we know that even those who pay more than 30 percent of their income for housing may have difficulty affording necessities such as food, clothing, transportation, and medical care. And yet we are not ensuring that housing is built for these seniors in our community.

2) Persons with Disabilities

a) Need: The city's data shows us that 7.8% of San Clemente residents, not including children or seniors, are considered disabled.

The number above presumably includes an estimated 976 persons with developmental disabilities. The report states that approximately 13% of developmentally disabled persons live in care facilities or in independent or supported living.

b) Income: Persons with disabilities are more likely to be unemployed and live in poverty. People with disabilities who work earn, on average, $\frac{2}{3}$ that of non-disabled persons. For people who cannot work, their income If coming from Social Security as SSDI or SSI, would likely be anywhere from \$1,000 per month (SSI), to \$1300 per month (the average SSDI benefit). Many people with disabilities would be classified as having very low income.

c) Homelessness among disabled persons: According to the last Point in Time Count, 29% of unsheltered persons experiencing homelessness report having a physical disability; 25% report having mental health issues; and 14% report having developmental disabilities. HUD has estimated that nearly half - 47.3% - of people who are homeless report being disabled. These numbers are greater than in the population as a whole. People with disabilities are over-represented among people experiencing homelessness.

d) Supportive Housing: The draft reports: “The California Department of Social Services, Community Care Licensing Division reports that in San Clemente there.... (is) one adult residential facility” that provides in-home supportive services for adults who are not seniors. It appears that this is a 6-bed facility, the nature of which can not be ascertained, but is likely a privately run Board and Care. While not listed, we know that there is a new development in San Clemente which provides a home for 17 formerly homeless individuals with disabilities. This home was developed by Friendship Shelter, and not in any partnership with the city of San Clemente so there is no resident priority, and our homeless residents remain on the street. There is a significant need for Supportive Housing in our community for residents experiencing chronic homelessness who have disabilities. When developed the city should contribute and partner with developers to ensure that SC residents get priority.

e) Conclusion: Most people with disabilities can live independently. Many of those who can, however, live on very low income, and would be in the category of people for whom even “Affordable Housing” would not be accessible. There are many people who need support in order to live independently. Data shows us that people with disabilities are disproportionately represented among people experiencing homelessness, and experience shows us that providing proper affordable and supportive living situations provides stability and ends homelessness for people with disabilities.

3) Homeless Persons - Resources: Many issues regarding homelessness were addressed in the Coalition’s previous comments as we believe adequate Affordable Housing can end homelessness. Special groups of people experiencing homelessness - seniors and people with disabilities - were discussed above. This section will focus on Table 2-36 “Homeless Resources” as we see errors and a significant mischaracterization of the services listed.

a) Emergency shelter

1. **Friendship Shelter's Alternative Sleeping Location (ASL):** Friendship Shelter's emergency shelter is primarily for people with ties to Laguna Beach (LB) and/or clients of Friendship Shelter's other programs. At the last Point in Time Count, Laguna Beach had 145 people in the city experiencing homelessness. There were almost 800 unhoused people in the South Service Planning Area (SPA), and the ASL is the only shelter for single adult men without children in the entire SPA. They only have 40 beds, with 5 reserved for LB police, and people can stay as long as they need to if they're working on a housing plan, so there are rarely beds opening up. Friendship Shelter ASL should not be counted as a resource for SC residents.
2. **Laura's House:** Laura's House cannot serve women with significant mental health issues, nor women with substance abuse issues, so it is not an option for many/most women experiencing street homelessness in San Clemente. There are no resources in Orange County specifically for women experiencing homelessness and experiencing domestic violence.
3. **Family Assistance Ministries (FAM):** FAM periodically provides emergency shelter for people in town, but it is usually very short-term and typically only when another solution to the homelessness is imminent. Additionally, fluctuating funding results in inconsistent abilities to provide emergency shelter. These things result in few people being sheltered from street homelessness. Since funds became available during the pandemic to provide emergency housing, however, FAM has been able to help more people, taking some people directly off the street. Nonetheless it is always very short of the need. The funding from the pandemic is expected to end in June, or possibly may last until September at the latest, so this resource - FAM providing this shelter - will not likely continue to be available.

b) Transitional Housing

1. **Gilchrist House and Home Aid:** FAM'S transitional housing programs provide temporary shelter to up to 12 families and 8 single women without children. They are usually at capacity. The programs also have certain requirements that make them unavailable to a segment of the population who are homeless. Namely that they require sobriety. While that is important for having the kind of homes they want, the shelter then is not a

resource for a certain segment of the population of homeless women. The structure and shared rooms also make it impossible for some people with mental health issues including PTSD to tolerate. While they are great programs which help many women and families, they are not accessible to many unsheltered homeless women in SC. Further, the programs are not for single men without children who are the majority of people experiencing homelessness in San Clemente.

2. **Henderson House:** Henderson House is primarily for Transitional Age Youth primarily coming from Friendship Shelter's programs. This is another program that is not accessible to the majority of people experiencing homelessness in SC.

c) Rental and Support Services

1. **Family Assistance Ministries:** FAM used to provide food, clothes, and case management to people experiencing homelessness, but after receiving harassment and threats in 2018 from housed residents for providing services to people experiencing homelessness, they significantly cut back on providing services to people who are homeless. Many people experiencing homelessness stopped going there for assistance at that time. FAM said they would still provide services to homeless people who were willing to "work on a housing plan," but how it worked out in actuality for many unsheltered people was being turned away even from receiving food or clothing assistance.

Additionally, FAM's location makes it challenging for many people experiencing homelessness to access. Even with Lyft services in the city, many people who are homeless, not having smart phones or charged phones, cannot use Lyft. Most people experiencing street homelessness in the city no longer access the food or clothing at FAM.

Nonetheless, despite FAM not being considered a resource for many people experiencing homelessness in town, they have, as discussed above, recently been able to help several people with emergency shelter.

2. **Dayle McIntosh Center for the Disabled, Laguna Hills:** This is not a program for homeless people in SC. Here is an example of their "housing assistance," from their website: "At this time, the Dayle McIntosh Center

(DMC) can provide resources such as affordable housing and emergency shelter lists and information on tenants' rights and responsibilities. DMC can sometimes aid with accessibility modifications in the home. Please note: DMC does not own or operate any housing units nor does the organization have funding for emergency shelter."

3. **RIO Adult Day Health Care Center:** This is not a program for unsheltered people experiencing homelessness. Can someone who is homeless go there? Perhaps, but this is like listing all the doctors in SC as resources for people who are homeless because they can go there for medical care.
4. **St. Clemente's-By-The-Sea Episcopal Church Summer Food Service Program:** There is no record of this existing recently. It is, or was, at most, a lunch program for all children in the neighborhood, not a program for homeless children, and certainly not a program for adults who are homeless.
5. **CUSD Family Resource Center & Learning Links Program:** this is a program at Las Palmas school. This is for preschoolers and their parents. This is no more a program for people unsheltered than any pre-school or school is.
6. **South County Outreach:** these services are in Irvine. Most homeless, usually carless, people cannot access a food bank in Irvine.

The transitional housing program they operate is for families only, up to 37 adults and 66 children. At the last Point in Time Count there were 246 family individuals (adults and children combined) experiencing homelessness in the South SPA, including 59 in SC.

7. **Camino Health Center San Clemente:** this location has been closed for over a year. People do go to the San Juan Capistrano location, but this is just medical care for anyone and does not affect a person's homelessness. They do not help patients apply for benefits or housing.
8. **Salvation Army Family Services 616 South El Camino Real, Suite B San Clemente:** There's no evidence that this exists. No one from the Coalition, including people familiar with services accessed by homeless persons in town, have ever heard of the Salvation Army providing any social services in town.

4) Review of Past Accomplishments - One comment:

The Draft Housing Element, in Table B-1, under “Progress” states, “In May 2019, the City designated a campsite for the homeless to provide for the needs of unsheltered individuals. Due to the significantly reduced homeless population in San Clemente by the end of 2019, the City chose to close the designated campsite in December of 2019.”

According to our research, this is inaccurate. There was no significant reduction in homelessness at the end of 2019 that would justify no longer “provide(ing) for the need of unsheltered individuals.”

At the end of August 2019 the camp had at least 70 people in it, and there were still many people homeless in SC who had never gone to the camp. The city closed the camp on August 30, saying it was for a cleaning, and when they re-opened later that day they only allowed back in people who could adequately prove ties to the city. There were reportedly 29 people remaining, with the other 41 people kept out. Over the ensuing months more and more people were kicked out of the camp, such that there were only five or six people in the camp by December 2019 when the city decided to close the camp. **While some people who had resided in the camp may have moved on to other cities in the months following their eviction from the camp, the homeless population in the city was certainly not “significantly reduced.”**

The population in the camp was reduced by the evictions on the 30th, and then by many more over the next couple months, but the number of people experiencing homelessness in the city was not significantly reduced. People continued to be homeless in San Clemente: those who never went to the camp remained where they were all along, those evicted from the camp continue to be homeless in town, many having to find new places to sleep or camp, and even those last five or six who remained in the camp at the end of the year continue to be homeless in San Clemente. While the population may have swelled slightly when the city operated its designated camping lot, homelessness in the city was otherwise static. CityNet’s street outreach data reports 97 unique contacts in June 2020, which corresponds with the 96 unsheltered homeless individuals counted in the 2019 Point in Time Count. **The assertion that the city “chose to close the designated campsite” “due to the significantly reduced homeless population in San Clemente” should be corrected for accuracy.**

In conclusion, we appreciate your time in reviewing this extensive comment. We recognize a great amount of work has gone into the Draft HE. Given the tremendous importance of this endeavor, however, we urge City Council and city staff to continue working on the document. **We ask that you revise the Draft HE in light of our comments so the document can accurately reflect the realities of homelessness experienced by certain populations, including the realities of Affordable and Supportive Housing stock, and the dearth of services available, and we reassert comments, requests, and recommendations made by Coalition Chair Kathy Esfahani (correspondence dated May 18, 2021) in order to truly meet the housing needs of our community.** We would welcome the opportunity to meet with members of City Council, city staff, and the HE consultant to further discuss our ideas for improving the Draft HE.

Sincerely,

Jacky Trani and
Bridget Callanan
San Clemente residents and
members, San Clemente Affordable Housing Coalition

Cc: Jim Ruehlin, San Clemente (SC) Planning Commissioner
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