

11-0262



# Shelter Partnership

www.shelterpartnership.org

523 West Sixth Street, Suite 616 ■ Los Angeles, California 90014 ■ Fax (213) 689-3188 ■ (213) 688-2188

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February 9, 2011

Planning Commissioners  
c/o Commission Secretariat  
City of Los Angeles  
200 North Main Street, Room 272  
Los Angeles, CA 90012



Re: February 10, 2011 City Planning Commission Hearing  
Agenda Item 8  
Council File: 07-3427  
Case Number CPC-2009-800-CA

Dear Commissioners:

Shelter Partnership, Inc. is dedicated to alleviating, preventing and ending homelessness by assisting in the development of short-term and transitional housing programs, affordable housing, and supportive services for the homeless and potentially homeless throughout Los Angeles County. We have been following the Planning Department's development of the proposed Community Care Facilities Ordinance, and while we are pleased with much of the ordinance, we are also concerned with one of its main provisions.

Shelter Partnership commends the City for changing the stringent parking requirements for licensed Alcoholism or Drug Abuse Recovery or Treatment programs as originally proposed to instead match the more lenient Community Care Facilities requirements. We are also pleased that the City removed the sections of the proposed ordinance related to Correctional and Penal Institutions and Group Homes for Parolees and Probationers. We additionally support the regulation of State licensed community care facilities as "public benefits."

However, Shelter Partnership has serious concerns with the City's proposed changes to the definitions of "family" and "boarding/rooming house" through the addition of a "single housekeeping unit" definition. The inclusion of this "single housekeeping unit" term has the potential to constrain the siting of housing for people with disabilities, including the homeless.

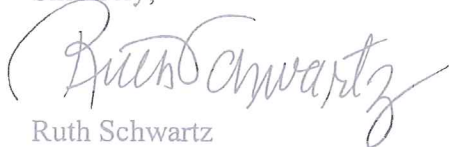
Requiring a single lease agreement in order to be considered a family for zoning purposes directly contradicts a number of local programs designed to combat homelessness. The most recent Planning Department staff report attempts to address this issue, as it was raised previously at the October 2010 hearing on this ordinance, but fails to do so adequately (p. 5).

Under the Mental Health Services Act, the State expressly allows shared housing for persons with mental illness, highlighting it as a way for extremely low-income mentally ill individuals with otherwise limited options to access and maintain permanent housing. Separate lease agreements are also required in order for clients in shared housing situations to be eligible for the City's Homeless Prevention and Rapid Re-housing Program (HPRP). The County's General Relief (GR) Housing Subsidy Project, in which eligible GR recipients receive a \$400 rental subsidy, also depends on shared housing with separate rental agreements for its success.

Furthermore, unlicensed group homes are often an appropriate housing type for people with disabilities; the proposed revised definition of family will restrict the development of such housing and effectively remove one type of housing option for the disabled and homeless. This attempt by the City to handle a small number of problematic group homes will in fact have a detrimental impact on the development of permanent supportive housing in certain residential zones. We encourage the City to instead consider revising its nuisance abatement procedure in order to effectively control those improperly managed group homes.

It is our hope that the Planning Commission will refer this proposed ordinance back to the Planning Department for further revision to ensure that the City continues to treat housing for persons with disabilities equitably. Should you have any questions, please feel free to contact me by email at [rschwartz@shelterpartnership.org](mailto:rschwartz@shelterpartnership.org) or telephone at 213-943-4580.

Sincerely,



Ruth Schwartz  
Executive Director

cc: Sarah Dusseault, Office of Councilmember Eric Garcetti  
Kathy Godfrey, Office of Councilmember Jan Perry  
Matt Karatz, Office of Mayor Antonio Villaraigosa