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FILE COPY

- 1736 Family Crisis Center
- Alcott Center for Mental Health Services
- ALMA Family Services *
- Almansor Center
- Amanecer Community Counseling Service
- A.P.C.T.C./S.S.G.
- AspiraNet
- Aviva Family & Children's Services
- Barbour/Floyd Partners
- Bienvenidos Children's Center
- B.R.I.D.G.E.S., Inc.
- Center for Aging Resources
- Child & Family Center
- Child & Family Guidance Center
- ChildNet Youth & Family Services
- Children's Bureau of Southern California
- Children's Hospital of Los Angeles
- Children's Institute, Inc.
- Community Family Guidance Center
- Concept 7 Fam. Support & Treatment Ctr.
- Counseling4Kids, Inc.
- D'Veal Family & Youth Services
- David & Margaret Home, Inc.
- Didi Hirsch C.M.H.C.
- Dubnoff Center
- Eisner Pediatric & Family Medical Center
- El Centro De Amistad, Inc.
- ENKI Health & Research Systems
- Ettie Lee Youth & Family Services
- Families Uniting Families
- Five Acres
- Foothill Family Service
- Gateways Hospital & M.H.C.
- The Guidance Center, Inc.
- Hathaway-Sycamores Child & Family Svcs.
- Health Research Assoc./USC S.H.
- The H.E.L.P. Group
- Hillside
- Hillview M.H.C.
- Hollygrove - An EMQ Agency
- Homes for Life Foundation
- Inst. for Multicul. Couns. & Ed. Svcs.
- Intercommunity Child Guidance Center
- Jewish Family Services of Los Angeles
- Junior Blind of America
- Kayne Eras Center
- Kedren C.M.H.C.
- Koreatown Youth & Community Ctr.
- LeRoy Haynes Center
- Los Angeles Child Guidance Clinic
- Maryvale
- Masada Homes
- McKinley Children's Center
- Mental Health America of Los Angeles
- Olive Crest Treatment Centers
- Optimist Youth Homes & Family Svcs.
- Pacific Clinics
- Pacific Lodge Youth Services
- Para Los Niños
- Penny Lane Centers
- Phoenix House
- Prototypes/I-CAN
- Rosemary Children's Services
- San Fernando Valley C.M.H.C., Inc.
- San Gabriel Children's Center, Inc.
- Social Model Recovery Systems
- S.C.H.A.R.P.
- So. Cal. Foster Family/Adoption Agency
- SPIRITT Family Services
- St. Anne's
- St. John's Child & Family Dev. Center
- St. Joseph Center
- Star View Children & Family Services
- Step Up on Second
- Tarzana Treatment Centers
- Tessie Cleveland Comm. Svcs. Corp.
- Tobinworld
- Transitional Living Centers
- Trinity Youth Services
- United Care, Inc.
- Verdugo Mental Health
- VIP C.M.H.C., Inc.
- The Village Family Services
- Vista Del Mar Child & Family Services
- Westside Children's Center
- WISE & Healthy Aging

November 2nd, 2010

William Roschen, President
Los Angeles City Planning Commission
City Council Chamber- City Hall Room 340
200 N. Spring Street
Los Angeles, CA 90012

Dear President Roschen:

Subject: CPC-2009-800-CA; Proposed Amendments to Ordinance Impacting Housing for Persons with Disabilities

On behalf of the Association of Community Human Service Agencies (ACHSA), we are writing to oppose several of the proposed amendments (outlined below) which impact housing for persons with disabilities due to the negative consequences to our member agencies' ability to provide services to vulnerable clients throughout the City of Los Angeles.

ACHSA is an organization representing more than 85 nonprofit community agencies providing child welfare, mental health, and juvenile justice services for very vulnerable individuals and families, many of which require the kind of facilities these proposed amendments seek to restrict. Housing programs that provide invaluable services to former foster youth, the physically and mentally disabled, and the elderly will all be adversely affected by these amendments.

First, the single lease requirement severely impedes many types of cohabitating living arrangements and undercuts the protections afforded by landlord-tenant laws. Individual lease agreements allow for more flexible living arrangements due to the direct negotiations between landlords and those who may require accommodations based on their specific needs and disabilities. Without these separate contracts, entire homes will be evicted if one resident faults on the lease.

Second, the amendment proposes that "family" be defined by a "single housekeeping unit" which requires a single lease agreement. If there is more than one lease agreement, the City will presume a boarding house use. Boarding houses will be further prohibited from restricted density zones, in addition to the current prohibition from R1 and R2 zones, severely limiting siting opportunities for these types of facilities. A concerning consequence of

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severely limiting siting opportunities for these types of facilities. A concerning consequence of the proposed single lease requirement in conjunction with the boarding house definition would be the restriction of the placement of transitional housing programs that care for former foster youth who would otherwise be at risk of homelessness, because such programs commonly require youth to sign separate leases.

Third, the new ordinance requires more parking spaces per resident for drug and alcohol facilities than are required for community care and residential care facilities. We would ask that the less restrictive requirement apply to both types of facilities, as both provide housing for people with disabilities, with no real justification for additional parking space.

Fourth, the density limit of two persons per bedroom conflicts with state law occupancy standards and treats those with disabilities differently than those without, again with no legitimate justification.

There is currently a well-recognized lack of adequate housing options for vulnerable youth and adults in the city of Los Angeles. The aforementioned proposed amendments are not supported by health and safety justifications and would further decrease the number of housing services for clients with special needs. Accordingly, we respectfully ask that you oppose these proposed amendments.

Sincerely,



Bruce Saltzer
Executive Director



TJ Hill
Mental Health Policy Director

cc: City Planning Commissioners