

Amity Foundation
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House of Metamorphosis



CALIFORNIA
THERAPEUTIC
COMMUNITIES

11-0262
CPC 2009-800-CA

Inland Valley Recovery
Mental Health Systems
Pathway Society
Phoenix House
Walden House
WestCare California, Inc.

October 6, 2010

Mr. Logrande, Director
Los Angeles City Planning Department
Los Angeles City Hall
200 North Spring Street, Room 272
Los Angeles, California 90012

RE: Case No. CPC 2009-800-CA
CEQA ENV-2009-801.ND
Council File 07-3427

Dear Mr. Logrande,

I am the President of California Therapeutic Communities (CTC), a consortium of treatment providers serving individuals with substance use disorders throughout California. I am writing on behalf of our member organizations in Los Angeles to request clarification on the legal opinions provided in connection with the proposed ordinance above.

The legal opinions that the City of Los Angeles has cited as permissive of the proposed ordinance address the siting of sober living residences, yet the ordinance, as proposed, reaches far beyond sober living residences to include the regulating of bedroom capacity and parking spaces for alcohol and drug abuse treatment programs. Please clarify the legal opinions the City has received that permit such regulations where such regulations may result in creating barriers to accessing treatment for individuals afflicted with substance use disorders.

Moreover, the proposed ordinance and accompanying documentation does not provide any information regarding the means in which the City used to determine the minimum number of parking spaces or maximum number of persons per bedroom for treatment programs. The requirements, as proposed, would have a dramatic impact on the number of available treatment beds in Los Angeles, sharply reducing existing capacity. Will the City please provide information as to how the above requirements were determined and if there is research and/or case law supporting the regulation of state licensed substance use disorder treatment programs as proposed in the ordinance? Do the requirements, as stipulated in the proposed ordinance, lead to safer communities or preserve the character of the neighborhood?

Without the documentation requested above, the regulations appear arbitrary and discriminatory, serving only to prevent treatment programs from providing services *in Los Angeles for community members of Los Angeles in need of care*. The members of CTC believe that the proposed ordinance will serve to significantly limit the availability of treatment for individuals with a qualified disabling condition and, as such, is in conflict with laws that protect the rights of individuals with disabilities.

On behalf of the CTC membership, I look forward to your response.

Sincerely,

Richard Jimenez, President
California Therapeutic Communities
1550 Evans Avenue
San Francisco, California 94124
(415) 970-7542 or Rjimenez@waldenhouse.org

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