



# 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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March 25, 2011

Councilmember Ed Reyes  
Chair, Planning and Land Use Management Committee  
City Hall  
200 North Spring Street, Room 410  
Los Angeles, CA 90012

Re: March 29, 2011 PLUM Committee Meeting  
Council File: 11-0262  
Opposition to Proposed Community Care Facilities Ordinance

Dear Councilmember Reyes:

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 closely the Planning Department's development of the Community Care Facilities Ordinance. While we are pleased with the proposed treatment of large licensed community care facilities as "public benefits," we are concerned with one of the ordinance's main provisions.

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 through the provision of permanent supportive housing in shared housing situations. This ordinance would restrict group homes and shared housing in single-family homes, which largely operate with separate lease agreements, to high-density residential zones by classifying them as a boarding house. The February 2011 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).

*Councilmember Ed Reyes*

*March 25, 2011*

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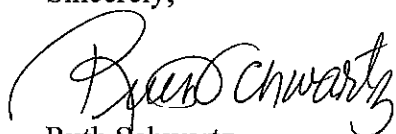
Under the Mental Health Services Act, the State expressly allows shared housing for persons with mental illness, highlighting it as a way for extremely low-income mentally ill individuals with otherwise limited options to access and maintain permanent housing. Separate lease agreements are also required 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 low-density 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 and Land Use Management Committee 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,

A handwritten signature in cursive script that reads "Ruth Schwartz". The signature is written in black ink and is positioned above the typed name.

Ruth Schwartz  
Executive Director

cc: Councilmember Jose Huizar, Vice Chair, PLUM Committee  
Councilmember Paul Krekorian, Member, PLUM Committee