

April 3, 2011

Planning and Land Use Management Committee
Board of Public Works Edward R. Roybal Hearing Room 350
Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012

RE: Proposed Community Care Facilities Ordinance
Council File No. CPC-2009-800-CA

Dear Planning and Land Use Management Committee:

I am writing to express my continued support, with some concerns, for the proposed Ordinance regulating Community Care Facilities and Boarding Houses and to respond to some of the questions raised at the PLUM hearing on March 29, 2011.

First, I would like to raise the following concerns:

The definitions should apply to all rented dwelling units/ properties. The proposed Ordinance provides and clarifies definitions of "*Family*," "*Boarding House*," and "*Single Housekeeping Unit*" to clarify and better enforce existing zoning laws.

The Standards provided by this proposed Ordinance must apply to all rental units addressed. Reasonable Standards are provided for uses determined to be public benefit and to locate in low density neighborhoods. These standards for specific facilities are defined in the new paragraph 10 to be added to Subsection A of Section 14.00 of the Los Angeles Municipal Code (page B-6). The requirement to meet these standards should be extended to include all facilities covered by this Ordinance including group homes, boarding or rooming houses, student housing, sober living facilities, parolee homes, licensed community care facilities, and other facilities with transient characteristics with seven or more residents. These standards are rooted in existing code and provide a standard measure and tool upon which to base for findings. Basically all these standards for residential quality of life require: (1) sufficient parking; (2) access to the facility without interfering with traffic; (3) noise levels that do not disturb adjacent residents; (4) maintenance of the existing residential character of the building; (5) security lighting that does not intrude on adjacent residential properties; (6) no disruption of the peaceful enjoyment of adjoining neighborhood properties; and (7) total occupancy that does not exceed two residents for every bedroom.

Issues of over-Concentration must be addressed. The Proposed Ordinance must limit the proximity of Boarding Homes and Licensed Community Care Facilities to within 300 feet of similar uses in order to protect the character of established residential neighborhoods. The over-concentration of these facilities changes the nature of the neighborhood and will ultimately defeat the purpose of integrating the facilities within a stable established community. A proximity limit on these facilities to other similar uses will accomplish the goal for transitioning the residents into society without relegating the residents to a dumping ground or destroying the fabric of a neighborhood resulting in neighborhoods becoming totally transformed by an over concentration of these houses.

Second, I would like to respond to some of the questions regarding student housing raised at the PLUM hearing on March 29, 2011.

Ideally, the ordinance would include definitions and define additional conditions specifically addressing student housing, including issues of boarding house and group home formats as well as problems caused by over-concentration and party houses. However, that is not the focus of this ordinance. This ordinance should not be held up to address these specifics. At the same time, for the same reasons, there is no reason for student housing to be specifically exempted from the

provisions of this ordinance. Poorly managed rental unit facilities, rooming houses and/or student group homes present as many problems as any other similar facility. In fact, they present additional problems of underage drinking, drug use and nighttime activities. Further, students, particularly under age residents, are just as vulnerable to exploitation as any of the protected classes identified in the ordinance. My neighborhood has been plagued with these problems for many years including instances of, but are not limited to the following:

- Late night noise disturbances requiring police or private security intervention
- Public urination and indecent exposure including sexual activity
- Public drunkenness and drug use
- Lack of compliance to community standards such as trash collection, dumping, and basic maintenance issues
- Increased crimes of opportunity
- Increased pest and feral animal infestation
- Increased automobile traffic and street parking
- Paving of entire yards and front yard parking

In the future, the provisions of the Ordinance should be modified to supplement and build upon existing laws and authority and could be structured so as to have little to no effect on owner-occupied homes who “take in a boarder or two.” While many facilities are well managed and successfully self-regulate, the need for regulation by the City has been documented through the multiple hearings and public comment submitted with evidence of the problems created. Such regulation can be an important step in providing communities the tools to protect the quality of life for everyone in our residential neighborhoods while providing for the rights of those needing varied housing opportunities and those who need to supplement their household income. It simply requires those who would run a business to do so responsibly and with respect for the community within which they operate.

In conclusion, the Ordinance proposed is a smart, well balanced approach in that it takes into account both the need for a variety of housing situations while maintaining the character of our residential neighborhoods.

Sincerely yours,

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Copy to:

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