



April 19, 2012

Councilmembers Reyes, Huizar, Englander  
Planning and Land Use Management  
City Hall  
200 North Main Street  
Los Angeles, CA 90012

RE: Ordinance Regulating Community Care Facilities and Boarding Houses, Case No. 11-0262

Dear Councilmembers Reyes, Huizar and Englander,

Los Angeles Coalition for Neighborhoods is a nonprofit organization which supports the City's efforts to regulate boarding houses and community care facilities in low density residential neighborhoods. 38 other Neighborhood Organizations have agreed that the City needs an ordinance that regulates these businesses. We urge the following:

1. **The proposed definition of "Single Housekeeping Unit" must be adopted including, in particular, reference to the following three concepts:**
  - a. The household is the functional equivalent of a traditional family
  - b. The makeup of the household is stable and semi-permanent
  - c. The makeup of the household is determined by the residents of the unit

Anything less specific will render the ordinance unenforceable.

2. **The proposed definition of "Boarding or Rooming House Business" must be adopted, including, in particular the reference to two separate leases.**

As a result of the recession, boarding houses have infiltrated low density residential communities. Typically, a homeowner who is moving for work, but cannot sell their house or a homeowner who can no longer afford the mortgage, leases their home in order to get out from under a huge burden. If "Boarding House" is defined as a dwelling where lodging is provided under three or more leases, boarding houses will flourish in low density zones. Many Boarding Houses currently employ two leases, one between the homeowner and business operator and another between the operator and individual lodgers. If the number of allowable leases is increased to two, the ordinance would provide no protection to low density neighborhoods.

**3. Community Care Facilities serving 7 or more residents must be prohibited in low density zones and required to obtain a conditional use permit in order to locate in R3 and higher zones.**

There is absolutely no precedent for granting community care facilities public benefit status in low density zones. For example, while homeless shelters are deemed public benefits in R3 zones, they are prohibited in R1 and R2 zones. LAMC Section 1400(A)(8). There simply are no facilities similar to that of community care facilities that are given this broad based freedom to locate in any zone in the city without first obtaining a conditional use permit. Public benefit status is more typically reserved for libraries, museums, fire stations, parks and playgrounds. LAMC Section 1400 (A).

- a. Oakland, Orange, Pasadena, Riverside, and Santa Monica all prohibit community care facilities serving 7 or more in low density zones and require a conditional use permit in higher density zones.
- b. Los Angeles already prohibits “transient occupancy residential structures” in low density zones and requires them to obtain a conditional use permit before locating in higher density zones. LAMC Sec. 12.24(W)(24) pertaining to hotels.

Alternatively, similarly to Anaheim, Colton, Fontana, Fresno, Murrieta, Sacramento, and San Diego, Community Care Facilities serving 7 or more residents must be required to seek a conditional use permit in order to locate in specified zones.

**4. The ordinance must define “Parolee/Probationer Homes.”**

Colton, Fontana, Murrieta, Orange, Riverside, and Sacramento have all addressed the definition of “Parolee/Probationer Home.” With the pending influx of parolees and probationers from the state prison system, it is critical that the Los Angeles City Council address this immediately.

Sincerely,

Rebecca Lobl  
President  
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