

- JADE BAILEY-WONG AT CITY HALL ON JUNE 8 2015  
UPON MEETING WITH HPOZ REGARDING THIS REQUEST

**APPEAL:**  
**530 S ROSSMORE AVE 90020 RAO**  
**Case # DIR 2015-3546 (RAO)**

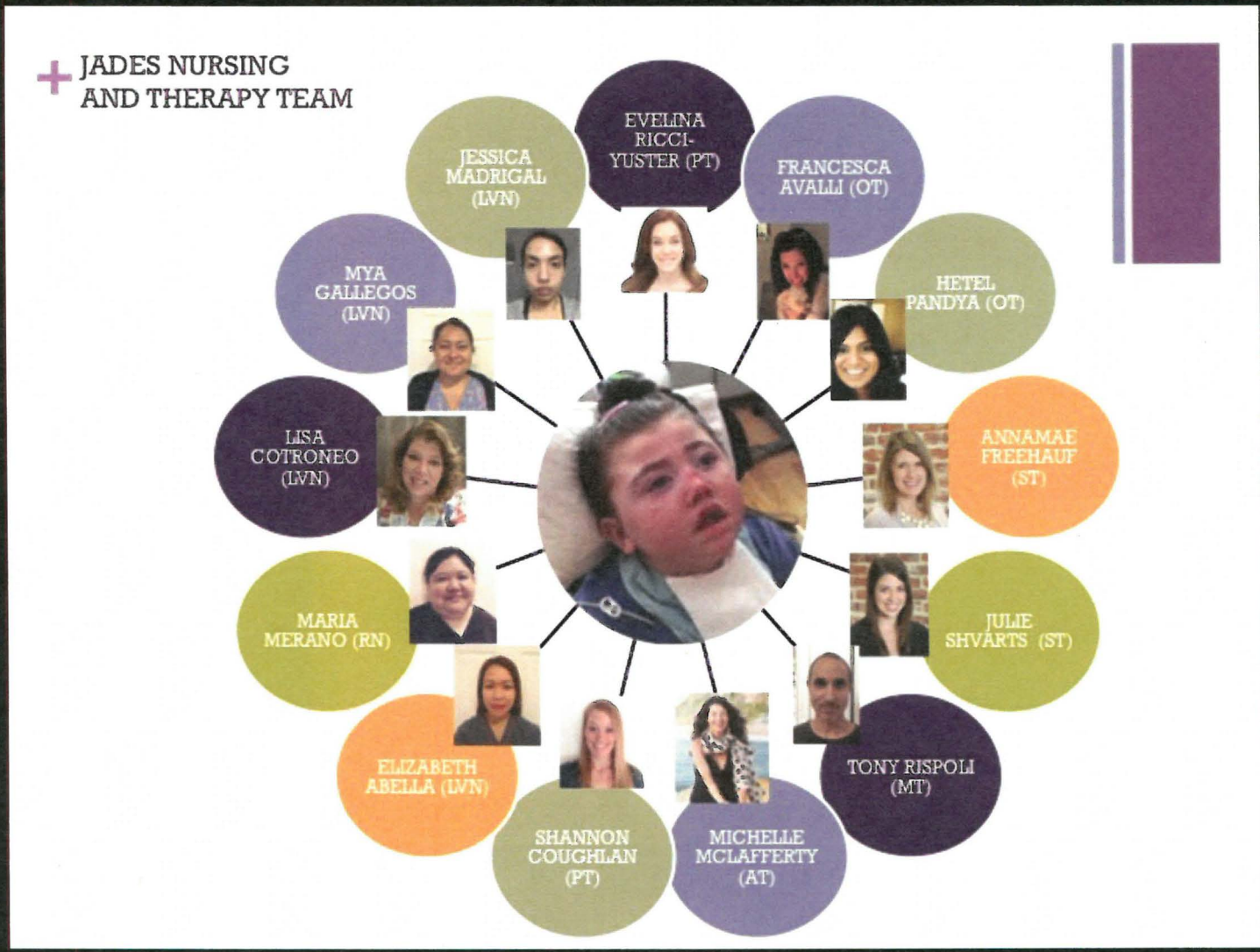
# EXHIBITS

RECEIVED AT THE PUBLIC  
COUNTER ON: 4/1/16

3:00 pm  
L. Frazin Steele



# EXHIBIT A: JADE'S CORE NURSING AND THERAPY TEAM



**TherapyWorksLA**  
**5472 Wilshire Blvd. Unit B**  
**Los Angeles, CA 90036**  
[ot@therapyworkla.com](mailto:ot@therapyworkla.com)  
**(323) 964-0972**

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March 28, 2016

To whom it may concern,

My practice has been treating Jade Bailey-Wong with Occupational Therapy (OT) at her home since January 2015. She is a 9 year old girl, suffering from severe brain damage (Cerebral Palsy) as a result of injury at birth. She has spastic quadriplegia amongst numerous other physical and mental disabilities. She is wheelchair bound and amongst the most severe cases we have treated.

Unlike most of our other patients, Jade is not treated at our facility. Instead, she is treated at home under doctors order and we have advised the parents and Jades medical insurance on her care and required equipment given her home-based protocol.

Myself and my staff perform multiple therapeutic activities with her 4 times per week. These activities include range of motion exercises, tactile stimulation, weight bearing and massage. We incorporate a variety of equipment - some owned by Jade, others supplied by my practice. Equipment includes but is not limited to TumbleForms positioning platform, Exercise mats, Massage table, Hoyer lift, tactile balls, positioning chairs, variable axis swing, vibrational sensory equipment, supine stander and orthotics.

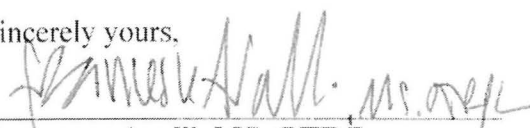
We perform therapy exercises on the area of lawn behind Jades home alongside the driveway. This area is ideal because provides the flat space we need for the equipment itself and to access each of the pieces using her chair and lift. It is also close enough to the house to allow extension cords to power her nursing equipment such as her oxygen concentrator, suction machine and feeding pump as operated by the nurse on duty. The area is also on soft ground which is preferable given the risks we have in transferring her into the equipment.

We avoid performing therapy indoors because there is not enough room to set up the large pieces of equipment; and we avoid being in Jades private quarters to minimize the introduction of germs.

The only difficulty we have with Jades case is the car access. Myself and staff have experienced difficulty in exiting the premises by backing out onto Rossmore Avenue. It can be very scary and takes a long time to wait for a safe moment. I have also had to stop work mid-session in order to let other cars out because we cannot get around each other in the driveway. I now find it more judicious to cut short Jades therapy so that I can park on the street (often blocks away as nearby parking is usually taken). These interruptions deny Jade the full benefit of her services but are necessary given the current parking environment.

My OT team is eagerly awaiting an approval for the requested driveway to allow us to perform the therapeutic activities Jade so desperately requires, and to the best of our ability.

Sincerely yours,

  
\_\_\_\_\_  
Francesca Avalli, MS, OTR/L



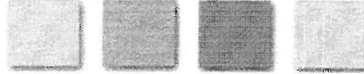
# DOUGLAS SPEECH ASSOCIATES

"Achieving Freedom of Speech"

1680 N. Vine St. Suite 816

Hollywood CA 90028

Telephone: (323) 960-0176



March 30, 2016

To Whom It May Concern,

I am the clinical manager at Douglas Speech Associates, a private speech-language pathology practice in Los Angeles, CA. My colleagues and I have had the privilege to provide highly intensive speech, language, and swallowing therapy for Jade Bailey-Wong since June 2015. We provide in-home therapy at her home of 530 S. Rossmore Ave., Los Angeles, CA.

Jade is a nine-year-old female child diagnosed with an anoxic brain injury that occurred during delivery. As a result, Jade is completely dependent on her caregivers for all care including feeding and communication. Given her severe oropharyngeal dysphagia, swallowing disorder, Jade is fed through a G-tube and requires regular suctioning for management of her secretions. She intermittently requires oxygen via a nasal cannula when her oxygen saturation levels drop below normal levels. She receives daily breathing treatments, uses the Vest Airway Clearance System, and requires frequent suctioning to clear secretion in her upper respiratory track and prevent aspiration of saliva. Throughout her life, Jade has had multiple hospitalizations including in the ICU for pulmonary infections. Jade does not consistently respond to visual, auditory, or tactile stimuli.

Jade requires consistent speech, language, and swallowing therapy to address her communication and swallowing disorders. She participates in x3-4 weekly speech, language and swallowing therapy sessions for clinical hours. Unlike most other patients, Jade receives therapy in her home due to her medically fragile condition and subsequent medical recommendations.

During these sessions, there is a requirement for access to electrical equipment. Specifically, Jade requires monitoring of her oxygen, heart rate, and respiratory rate while completing swallow exercises and stimulation techniques. In addition, access to suctioning equipment and enteral feeding equipment is necessary during sessions. Tools and equipment used for these highly specialized sessions are maintained in a sterile environment in the family's home and then subsequently used in designated therapy spaces to avoid cross-contamination and risk of exposing Jade to harmful bacteria.

In Jade's home, a large, safe and easily accessible therapy space has been created for Jade. This outdoor space allows Jade to be seen by multiple disciplines. Jade sees many different disciplines daily to include speech therapy, occupational therapy, physical therapy, nursing staff, massage therapy, and medical specialists. For purposes of cognitive stimulation therapy, Jade can be exposed to a huge variety of environmental sounds, sights, touches, smells in this outdoor therapy space. Per medical recommendations, therapists are not to see Jade in her sterile environment of her bedroom where therapy would need to occur if it were not for the availability of the outdoor therapy space.

Our practice is aware of and in full support for the Bailey-Wong family's request for a circular driveway and parking in the front of the home. The current parking situation makes it not only



difficult but also quite dangerous for the multiple disciplines to safely enter and exit the Bailey-Wong's residence in order to provide quality services for Jade. With speech therapy alone, sessions have started later than scheduled and terminated earlier than scheduled given the difficulty of street parking near the Bailey-Wong residence. Therapists such as my colleague, Julie Shvarts, and myself have needed to start sessions up to 10 minutes later than scheduled given the difficulty with parking. Additionally, sessions are terminated earlier than scheduled sometimes 10-15 minutes, as therapists need to move their vehicle prior to street cleanings. Therapists cannot park in the family's driveway, as consistent access is needed in case of emergencies for Jade. Backing out of the driveway is extremely dangerous given the high traffic on Rossmore Avenue. These factors directly and negatively impact Jade's progress in her speech, language, and swallowing progress.

We urge the approval of the request for a semi-circular driveway and parking at of 530 S. Rossmore Ave., Los Angeles, CA to support Jade Bailey-Wong's safety, health, and progress in therapy.

Sincerely,



Anamae M. Freehauf, M.S., CCC-SLP  
Speech-Language Pathologist  
Douglas Speech Associates  
T: 323-960-0176  
E: [anamae@douglasspeech.com](mailto:anamae@douglasspeech.com)

**Elizabeth Abella LVN**

March 31, 2016

2824 West Sunset Blvd  
Los Angeles CA 90026

To whom it may concern,

I am one of Jade Bailey-Wong's nurses and I've been working with her since her arrival from NY in August 2014. I work with her 4-5 days per week on 12 hour shifts.

Every day I drive to work. When I park my car in the driveway, I have to move my vehicle several times per day to allow other cars to enter and exit.

This means I have to back out my car onto Rossmore Avenue, and leave Jade without nursing supervision while I do this. It is a very dangerous street and I am scared each time.

I have had to fill-in for nurses who have decided not to take the case because of the parking issues. It's really difficult to park on Rossmore Ave because there are never any spots and leaving Jade is risky.

Please allow the family to install the driveway and parking in front so we can focus on what matters - taking care of Jade.



Sincerely yours,



March 26, 2016

To whom it may concern,

I have been caring for Jade Bailey-Wong for over one year during the night. My duties include monitoring her oxygen levels and heart rate, constantly adjusting her oxygen concentrator levels and bi-pap, administering respiratory, digestive and seizure medications, maintaining air-way clearance via oral suctioning, lubricating her oral cavity, g-tube feeding, regularly turning her to avoid bed sores and more. I have developed a very close connection with Jade and the family.

I have found that the parking situation at Jades residence to be very unsafe. In driving to work I would have to leave Jade's bedside to move my car every time somebody entered or left the home. I found this to be deeply troubling - primarily because I must leave Jade and hope nothing happened while I was away - but also because I would have to reverse onto Rossmore during busy evening hours with little visibility, and also that Jades van can easily be blocked in times of emergency by my car, or others'.

There were parking spots a few blocks away however I have a condition that does not allow me to walk these distances. Despite my close relationship with Jade I seriously considered searching for a new position.

In the end, I decided to stay with Jade and her family, but pay the expense from my own pocket to have a driver take me 19 miles between home (Reseda) and Hancock Park and back. I do this 4 nights per week.

Please grant Jade the circular driveway in front of the house. I've noticed many of Jades neighbors with the same and I'm sure they do not have the same degree of necessity as this family does.

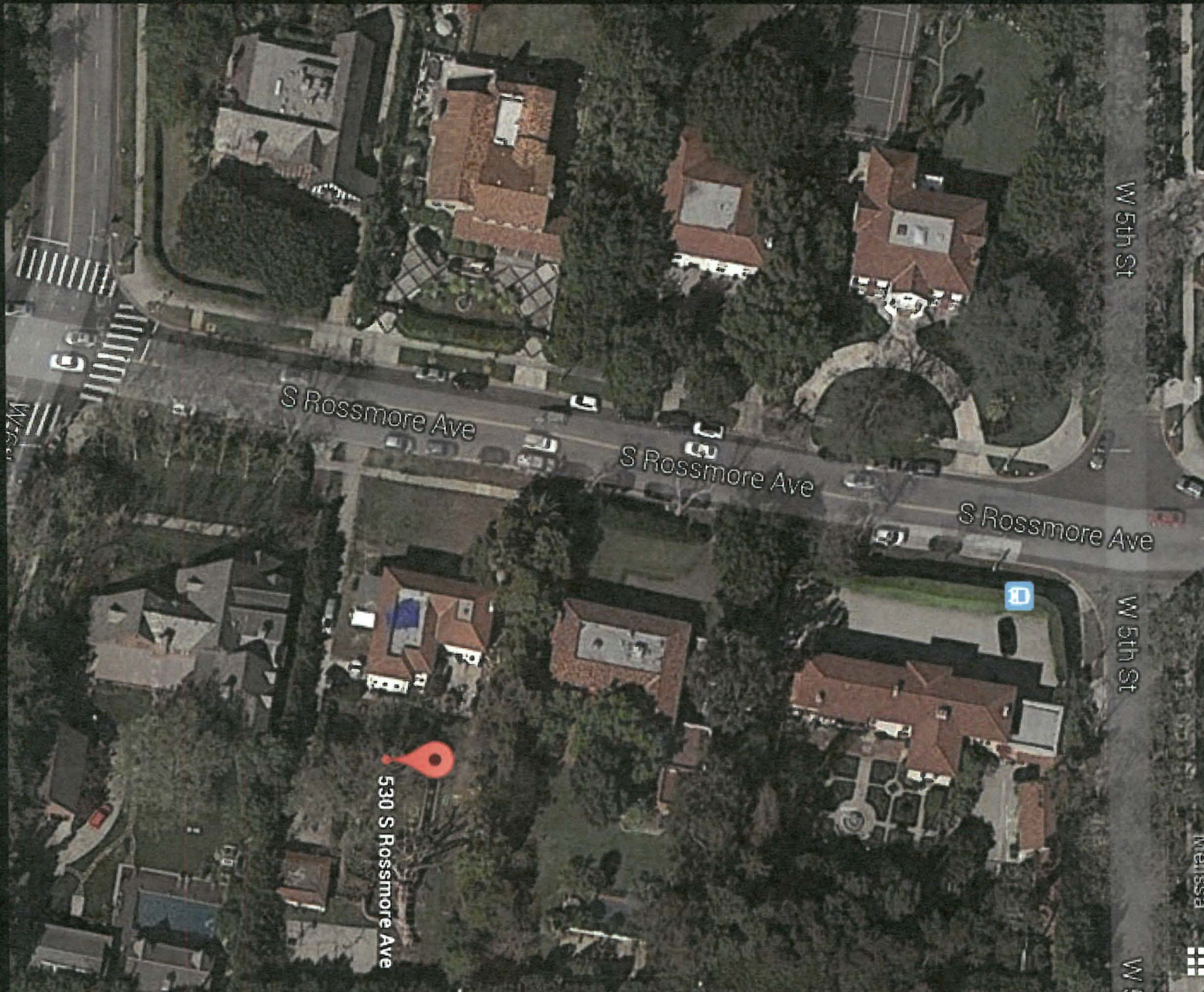
Sincerely yours,



Maria Merano. RN



EXHIBIT C: GOOGLE MAPS VIEW OF ROSSMORE AVE BTWN 5TH AND 6TH ST



Typical lack of available parking on Rossmore Ave. As seen here, not a single spot available.

Also note existing neighborhood driveways on this block:  
8 homes:  
6 with semi-circular / turnaround driveway  
2 with straight driveway



EXHIBIT D: OBSTRUCTION  
- GIANT TREE IN REAR

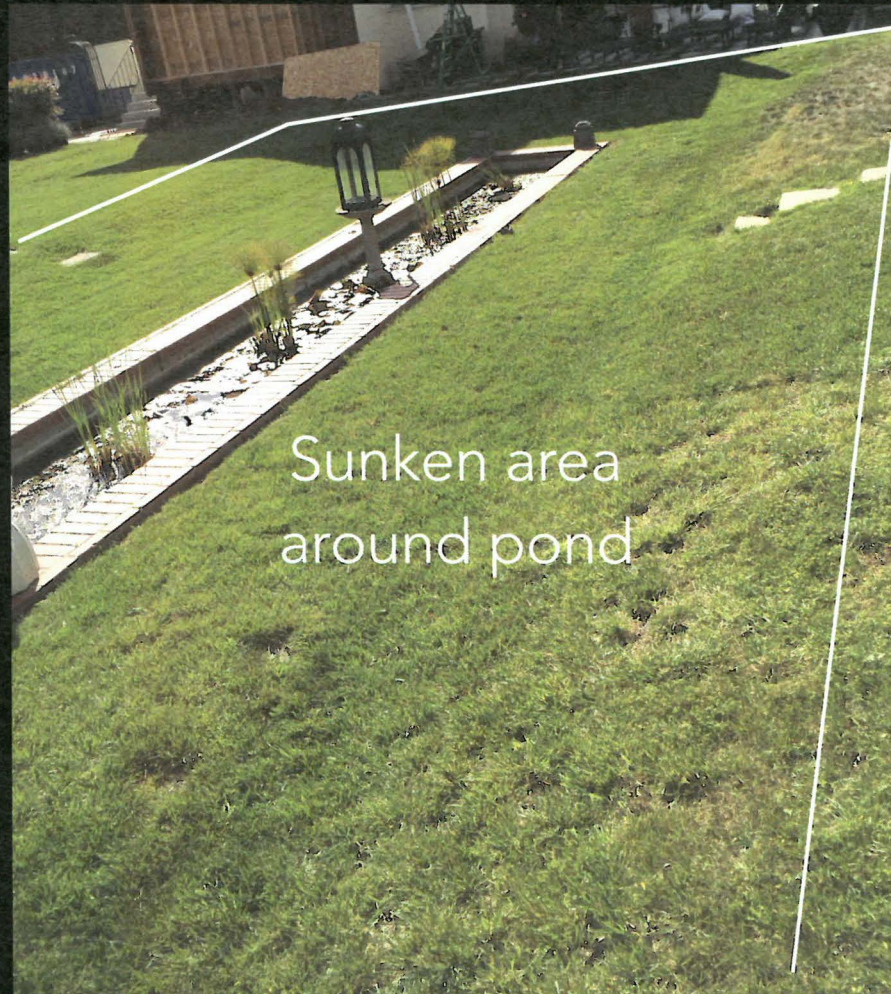


EXHIBIT E: OBSTRUCTION  
- AQUATIC THERAPY POOL



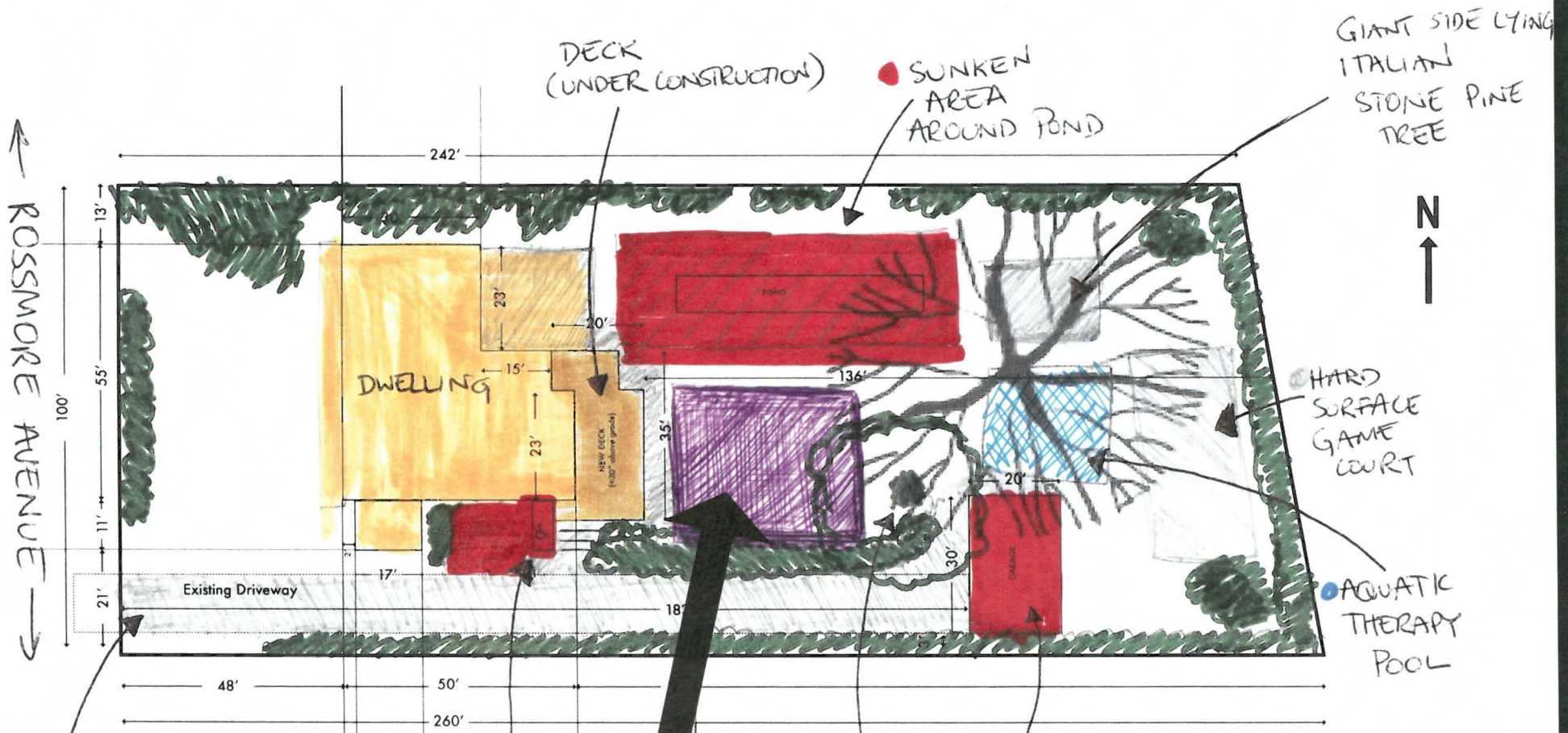


EXHIBIT F: OBSTRUCTION - POND WITH 2FT SUNKEN AREA



Sunken area  
around pond





**Site Plan**

**530 S Rossmore Ave,  
Los Angeles 90020**

TR 3446 Lot 15  
 County Map Reference #M B 37-84  
 Assessor Parcel # 5505-015-003

**EXHIBIT G: SITE PLAN SHOWING LAND USE AND OBSTRUCTIONS- SPECIFICALLY JADES THERAPY AREA**

# EXHIBIT H. LETTER FROM PHYSICAL THERAPIST



To whom it may concern,

I am the owner of PT N' Play - a pediatric physical therapy (PT) practice. My staff and I have been treating Jade Bailey-Wong (9 year old female) with PT since November 2014 at her home at 530 S Rossmore Ave, Los Angeles.

Jade presents with muscular-skeletal issues seen with extreme cases of cerebral palsy such as hers. She has no voluntary movement of arms or legs and no head control. Her breathing suffers from lack of muscle tone in her torso. Jade has had hip surgery, tendon release and a medicine pump installed in her abdomen to administer muscle relaxant directly into her spinal fluid. Despite these surgical interventions, Jade still requires regular PT in order to maintain range of motion and to build strength in her muscles and her bones to prevent atrophy. We perform PT with Jade four times per week. Unlike most other patients of ours, Jade receives therapy at home due to her fragile medical state and subsequent doctors orders. We have created an outdoor gymnasium/therapy space for Jade on the lawn to the rear of the house because there is a variety of large equipment that we use in her routine. The area is flat and approximately 1200 square feet, affording us the space to lay out her therapy mats, tumble form positioning equipment, hoist lift, supine stander and other equipment as well as the wheelchair accessibility required to navigate around. In order to place her in her large equipment, we use a lift with harness to take her from her wheelchair into her equipment. While this requires more space, it is Occupational Safety and Health Administration standards to use lifting equipment to transfer a patient of her weight (80lbs). This is for the safety of Jade and ourselves. While we perform therapy directly with Jade, Jade's caregivers and family are also trained and encouraged to perform additional activities with her in our absence.

We are aware of - and fully support - the request for a circular driveway and parking in the front of the home. I have discussed with the family that I have found it extremely dangerous to reverse out of the driveway onto Rossmore Avenue and have advised my staff against it. Not only does it present a danger, there is also interruption of therapy when we are required to move our vehicles to let somebody else out. The parking situation at Jade's home impinges on our ability to provide the full allocated duration of services. Our alternative is to park on the street, which is typically at some distance from the house. This results in our inability to carry large and/or heavy equipment that Jade would benefit from and also shorten the duration of her sessions.

Please approve the request for the semi-circular driveway and parking because it is having ramifications on the therapy that Jade receives.

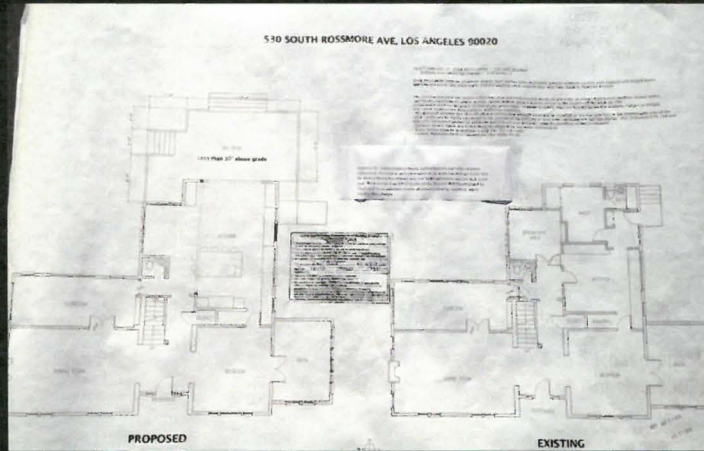
Regards,

*Evelina Ricci-Yuster, PT*

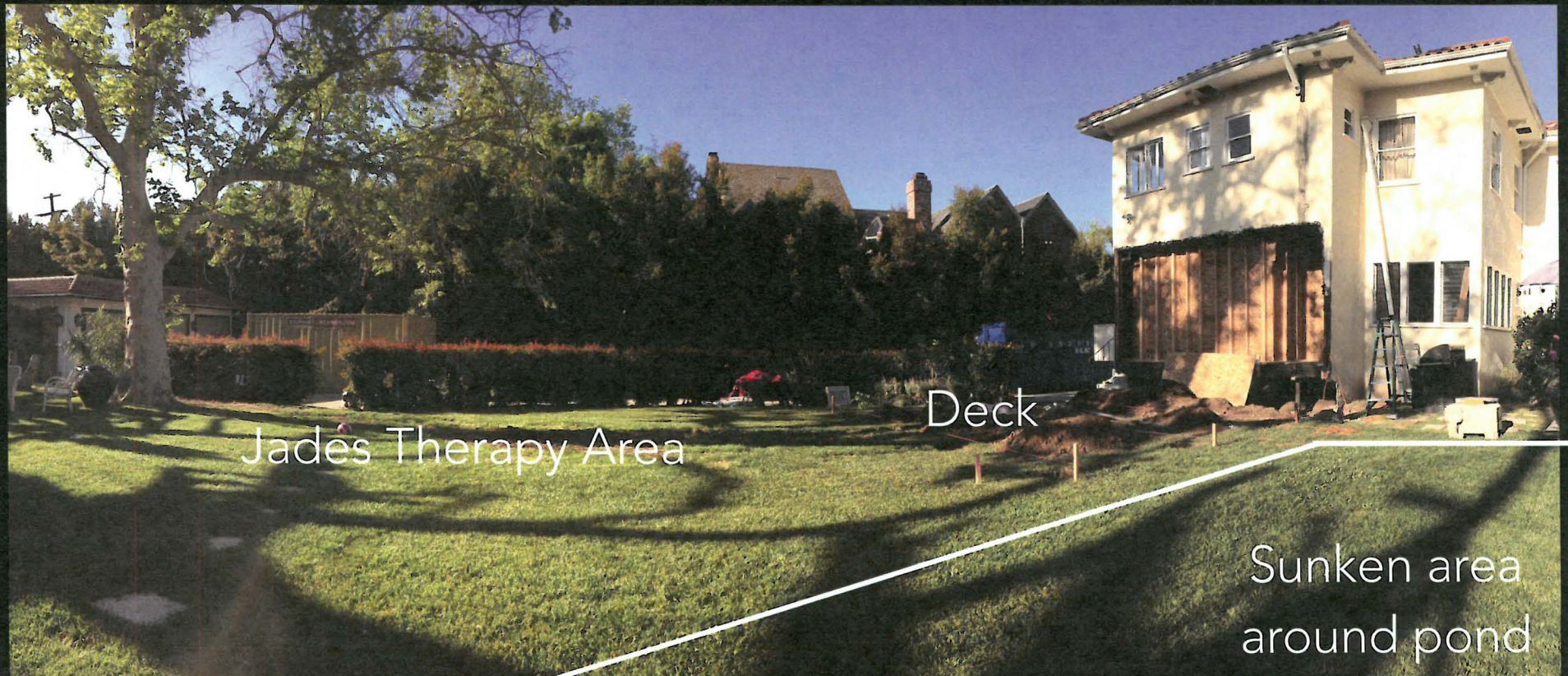
Owner and director of PT N' PLAY Physical Therapy Inc.



# EXHIBIT H(2) PERMITTED PLAN



## EXHIBIT I: OBSTRUCTION - DECK (UNDER CONSTRUCTION)





# EXHIBIT J: EXISTING SINGLE LANE DRIVEWAY CONDITION



Exterior wheelchair lift location



Slope too steep for ADA wheelchair access compliance and leads straight onto busy thoroughfare of Rossmore Ave



EXHIBIT K: UNOBSTRUCTED FRONT SETBACK



EXHIBIT K2: RECENT PICTURE OF EXISTING FRONT HEDGE TO CONCEAL REQUESTED DRIVEWAY AND PARKING





EXHIBIT L1: EAST SIDE AND WEST SIDE OF S ROSSMORE AVE BETWEEN 5TH AND 6TH ST



A

B EAST SIDE

530 S ROSSMORE AVE C

D

E

F

G

H



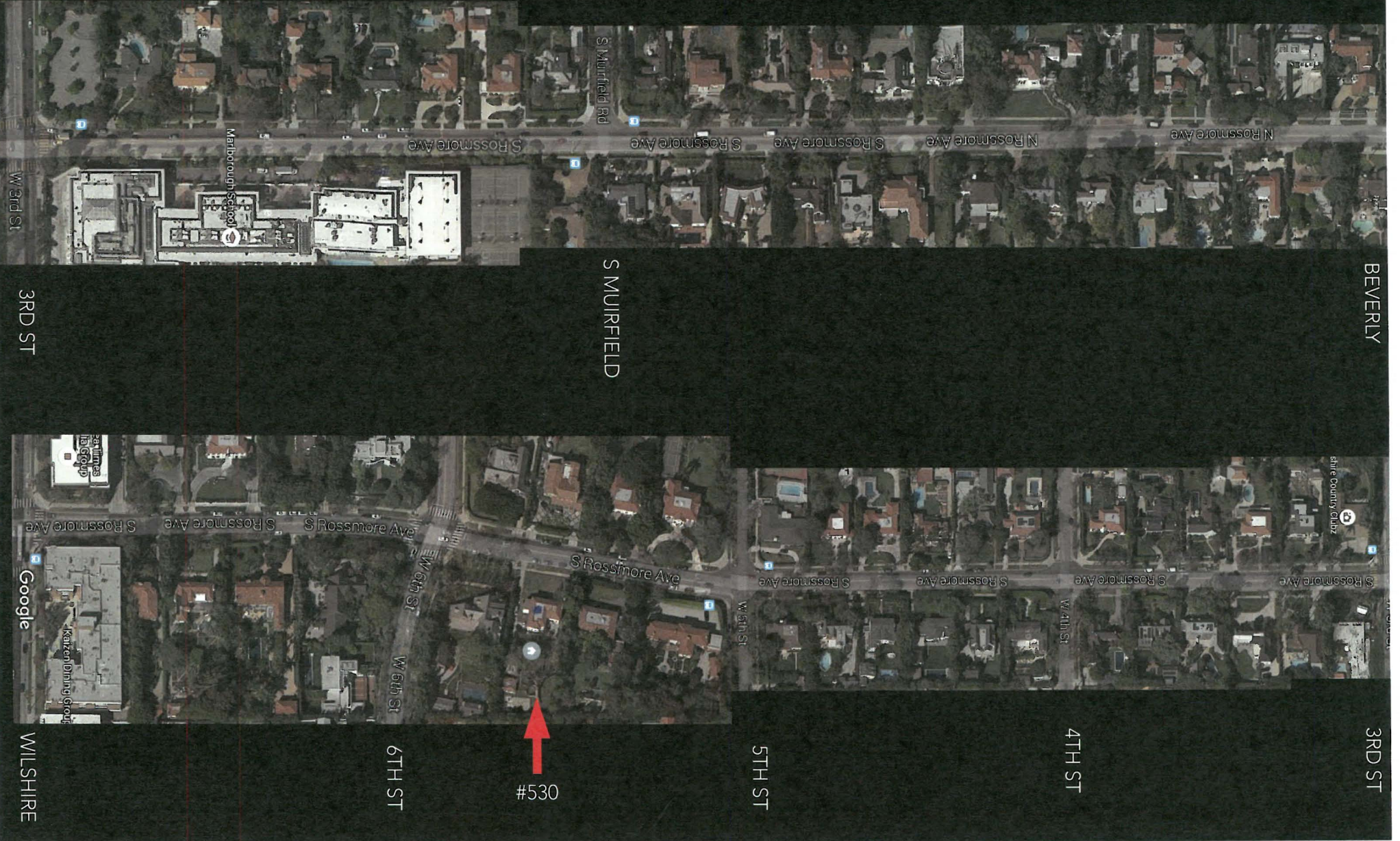
WEST SIDE



FOR CLOSE-UP, SEE EXHIBIT C



EXHIBIT L2: SATELLITE MAP OF S ROSSMORE AVE FROM WILSHIRE BLVD TO BEVERLY BLVD SHOWING REGULARITY OF SEMI-CIRCULAR / DUAL ENTRY AND TURNAROUND DRIVEWAYS IN FRONT SETBACK





# EXHIBIT L3: EARLIER PICTURE OF PROPERTY SHOWING EXISTING SLOPE CONDITIONS IN FRONT SETBACK

Gently sloped ADA (<4.9%) compliant wheelchair path requested alongside requested driveway

SPEED LIMIT 35

Too steep for wheelchair (+11%)

ROSSMORE AVE SLOPES DOWN-HILL (7%)

