


CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

DATE: November 15, 2018

TO: Public Counters
Department of City Planning Staff
Department of Building and Safety Staff

FROM: Kevin J. Keller, AICP 
Executive Officer, Department of City Planning

SUBJECT: Clarification Regarding Supportive Housing and Transitional Housing

The purpose of this memo is to provide guidance on zoning code regulations as they apply to the development of Supportive Housing and Transitional Housing, in a manner consistent with California Government Code Section 65583 and the Los Angeles Municipal Code (LAMC), as of the date of this memo. This memo provides guidance on five areas of clarification related to Supportive Housing, Transitional Housing and Supportive Services.

1. Supportive Housing and Transitional Housing are residential uses.

California Government Code Section 65583 states in relevant part:

Transitional housing and supportive housing shall be considered a residential use of property, and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.

Projects that meet the definition of Supportive Housing and Transitional Housing are residential uses and as such are permitted in any zones which allow a residential use. Consistent with state law, Supportive Housing and Transitional Housing should be subject only to the standards that are applied to other residential uses in the same zone. For this purpose, Transitional Housing and Supportive Housing are defined in Sections 50675.2 and 50675.14 of the California Health and Safety Code, respectively.

2. Supportive Services are included in the definitions of Supportive Housing and Transitional Housing, and are accessory to the residential use.

The following are definitions from the Los Angeles Municipal Code (LAMC) and California Health and Safety Code.

Supportive Housing: As defined in California Health and Safety Code Section 50675.14(b)(2), “Supportive Housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.”

This definition is consistent with the definition provided in LAMC 12.03, which further specifies that “any Floor Area used for the delivery of Supportive Services shall be considered accessory to the residential use.”

Transitional Housing: As defined in LAMC Section 12.03, Transitional Housing is defined as “a building where housing linked to Supportive Services is offered, usually for a period of up to 24 months, to facilitate movement to permanent housing for persons with low incomes who may have one or more disabilities, and may include adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.”

Supportive Services: Supportive Services are defined in LAMC 12.03 to include, “Services that are provided on a voluntary basis to residents of Supportive Housing and Transitional Housing, including, but not limited to, a combination of subsidized, permanent housing, intensive case management, medical and mental health care, substance abuse treatment, employment services, benefits advocacy, and other services or service referrals necessary to obtain and maintain housing.”

3. Supportive Services, when provided in conjunction with Supportive Housing or Transitional Housing, do not subject the project to any additional requirements.

Supportive Services, whether provided directly onsite or linked to outside providers, normally will require some physical space within the residential building dedicated to providing those services, including but not limited to: case management offices, community rooms, demonstration kitchens, recreational facilities, medical or health clinics, and counseling and referral facilities. Those services are intended for residents of the building only. Supportive Services that are provided onsite for use of residents are to be considered accessory to the residential use, and should not subject the project to any additional requirements, including maximum square footage limits when otherwise complying with total floor area regulations of the underlying zone. As such, the inclusion of qualified Supportive Services in conjunction with Supportive Housing or Transitional Housing does not require the provision of additional automobile parking.

4. Supportive Housing projects shall not be required to utilize LAMC Section 14.00 A.13 (“Density Bonus for Qualified Permanent Supportive Housing.”).

LAMC Section 14.00 A.13 provides a voluntary incentive program to qualifying Supportive Housing Projects. Supportive Housing projects are not required to utilize the incentives and

procedures in that Zoning code section. The adoption of that Subdivision by Ordinance No. 185,492 does not in any way invalidate the applicability of Government Code Section 65583, and Supportive Housing Projects may continue to use that Government Code Section in conjunction with other affordable housing incentive programs.

5. Supportive Housing and Transitional Housing shall not be required to utilize LAMC Section 14.00 A.12 (“Interim Use of Motels for Supportive Housing or Transitional Housing”).

LAMC Section 14.00 A.12 provides a voluntary, streamlined pathway to facilitate the interim use of an existing motel, Hotel, Apartment Hotel, Transient Occupancy Residential Structure, or Hostel as Supportive Housing or Transitional Housing. The adoption of that Subdivision by Ordinance No. 185,489 does not in any way invalidate the applicability of Government Code Section 65583, and Supportive Housing and Transitional Housing Projects may continue to use that Government Code Section in conjunction with other affordable housing incentive programs.

For questions, please contact Cally Hardy in the Department of City Planning at (213) 978-1643, or cally.hardy@lacity.org.