

Communication from Public

Name: Sunset Doheny Homes Associatoin

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Council File No: 25-1484

Comments for Public Posting: Community Impact Statement submitted by Sunset Doheny Homes Association

SUNSET DOHENY HOMES ASSOCIATION

March 17, 2026

The Honorable Traci Park

Councilwoman, District 11
Los Angeles City Council
200 N. Spring Street, Room 410
Los Angeles, CA 90012
councilmember.park@lacity.org

The Honorable John S. Lee

Councilman, District 12
Los Angeles City Council
200 N. Spring Street
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The Honorable Nithya Raman

Councilwoman, District 4
Los Angeles City Council
200 N. Spring Street, Room 425
Los Angeles, CA 90012
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Re: Council File No. 25-1484 — Proposed Ordinance Language Regarding Concentration of Sober Living Homes in Residential Zones

Dear Councilwoman Park, Councilman Lee, and Councilwoman Raman:

On behalf of the Sunset Doheny Homes Association, the homeowners association representing the residents of Doheny Estates, we are writing in connection with Council File No. 25-1484, jointly sponsored by Councilwoman Park and Councilman Lee, regarding the review of regulations addressing the concentration of sober living homes in residential neighborhoods. We are also directing this letter to Councilwoman Raman, as Doheny Estates is located within Council District 4 and the impacts described herein are directly affecting her constituents.

Enclosed for your consideration is proposed draft ordinance language that is intended to:

- Regulate cumulative concentration of sober living homes within Residential Zones;
- Establish objective, measurable thresholds for Conditional Use Permit review;
- Apply consistently to existing and future sober living homes under unified operation;
- Focus on land-use compatibility, infrastructure capacity, and emergency access considerations; and
- Maintain compliance with applicable federal and state fair housing requirements.

This issue is not hypothetical for our community. Carrara Treatment Wellness & Spa currently operates two residential drug and alcohol treatment facilities directly across the street from each other on Marcheeta Place in Doheny Estates — at 1814 Marcheeta Place and 1813 Marcheeta Place, Los Angeles, CA 90069. Both facilities are operated under unified ownership and management, and together they function as an institutional campus embedded within a single-family residential neighborhood. The concentration of these facilities on one narrow hillside street has resulted in increased vehicle traffic, commercial-scale staffing activity, frequent deliveries, and operational impacts that are incompatible with the residential character of the surrounding neighborhood and that strain limited hillside infrastructure and emergency access. The Carrara operation in Doheny Estates is a clear example of the type of overconcentration that the proposed ordinance is designed to address.

The proposed language has been structured to regulate operational intensity and concentration rather than resident status, and to provide a clear compliance pathway for existing facilities while preserving due process protections.

The framework of the proposed ordinance is modeled after sober living home regulations that have been adopted and successfully enforced by California cities. The City of Costa Mesa's ordinance, which requires conditional use permits and imposes a 650-foot separation requirement between facilities, has been repeatedly upheld by the United States Court of Appeals for the Ninth Circuit, most recently in *The Ohio House, LLC v. City of Costa Mesa* (December 2024). In that decision, the Ninth Circuit affirmed that separation requirements and permitting obligations do not violate the Fair Housing Act or California's Fair Employment and Housing Act, provided the regulatory framework confers a net benefit on the protected class. The City of Huntington Beach has since adopted a 1,000-foot separation requirement, the largest currently in effect in California, which has been enforced since 2018 without successful legal challenge. The proposed ordinance adopts Huntington Beach's 1,000-foot threshold as the concentration distance and incorporates the core regulatory principles established by both cities: focusing on land-use compatibility, operational intensity, and infrastructure impacts rather than the status of the residents themselves.

We respectfully request that this draft be forwarded to the City Attorney for formal legal review and analysis under Council File No. 25-1484, including evaluation of consistency with state and

federal law and potential fair housing implications. In particular, we ask that the City Attorney evaluate whether the ordinance's legal defensibility would be further strengthened by applying its concentration and permitting requirements to all programmatic or group residential uses — rather than sober living homes alone — with sober living homes receiving the benefit of a permitting pathway not otherwise available. This broader applicability approach mirrors the framework upheld in the Costa Mesa litigation, where the Ninth Circuit found that regulations benefiting the protected class through an affirmative permitting structure survived fair housing scrutiny.

Thank you for your leadership on this matter and for your consideration of this proposal. The residents of Doheny Estates appreciate your continued efforts to balance neighborhood compatibility, infrastructure capacity, and lawful housing operations within the City.

Please feel free to contact our association if additional clarification or information would be helpful.

Respectfully submitted,

Sunset Doheny Homes Association

Board of Directors

Enclosure: Proposed Ordinance Language — Council File No. 25-1484

PROPOSED ORDINANCE LANGUAGE

Amendment to the Los Angeles Municipal Code
Concentration of Sober Living Homes in Residential Zones

ORDINANCE NO. _____

An ordinance amending the Los Angeles Municipal Code to regulate the concentration of sober living homes within Residential Zones.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1.

A new Section ____ is hereby added to Article ____ of Chapter ____ of the Los Angeles Municipal Code to read as follows:

SEC. ____ . CONCENTRATION OF SOBER LIVING HOMES.

(a) Purpose.

The purpose of this Section is to prevent the overconcentration of sober living homes on residential parcels, preserve the character of low-density Residential Zones, ensure that cumulative operational impacts of sober living homes remain compatible with neighborhood infrastructure capacity, circulation, and emergency access standards, and protect the health, safety, and welfare of facility residents by establishing minimum operational standards that promote quality of care and prevent exploitation of vulnerable individuals in recovery.

(b) Applicability.

This Section shall apply to all Sober Living Homes located within Residential Zones.

For purposes of this Section, “Sober Living Home” shall mean any residential dwelling unit operated, in whole or in part, as a residence for persons recovering from drug or alcohol

addiction, whether or not licensed or certified by any state agency, including but not limited to alcohol and drug free living environments, sober living homes, recovery residences, and similar programmatic residential uses as defined elsewhere in this Code.

(c) Unified Operation Determination.

Two or more Sober Living Homes shall be deemed under unified operation where common ownership, management, operational control, or affiliated entity status exists.

(1) Affiliated Entities.

Affiliated entities include entities that:

- Share one or more common members, managers, officers, directors, or controlling persons;
- Share common beneficial ownership, directly or indirectly;
- Operate under a common state license, certification, or regulatory approval;
- Operate under a shared trade name, brand, marketing identity, or centralized admissions system.

(2) Common Control.

Common control includes circumstances in which an entity or person:

- Leases, subleases, or master-leases the dwelling unit;
- Provides operational management services;
- Exercises authority over admissions, staffing, or program operations;
- Receives revenue derived from operation of the dwelling unit.

The use of separate legal entities, property ownership structures, or contractual arrangements shall not exempt properties from unified classification where common ownership or control exists.

(d) Concentration Threshold – Conditional Use Permit Required.

A Conditional Use Permit (CUP) pursuant to Section ____ of this Code shall be required where:

1. Two or more Sober Living Homes under unified operation are located within **one thousand (1,000) feet** of one another; or

2. The cumulative licensed or approved resident capacity of Sober Living Homes under unified operation within 1,000 feet exceeds ____ residents.

Distance shall be measured in a straight line from the nearest property line of one parcel to the nearest property line of another parcel, irrespective of intervening streets or alleys.

(e) Applicability to Existing Facilities.

1. Any Sober Living Homes under unified operation that meet the concentration threshold described in Subsection (d) as of the effective date of this ordinance shall submit a complete Conditional Use Permit application within **one hundred eighty (180) days**.
2. An existing facility that timely submits a complete application may continue operating pending final determination of the application and exhaustion of administrative appeals.
3. If Conditional Use approval is denied, operation of the second or subsequent facility shall cease within **twelve (12) months** of final determination, unless otherwise extended by the City for purposes of orderly transition.
4. No expansion of resident capacity, staffing levels, operational intensity, or physical footprint shall occur during the review period.
5. Operation prior to the effective date of this ordinance shall not create a vested right to continue operation without compliance with subsequently adopted land use regulations.

(f) Conditional Use Findings.

In addition to findings otherwise required by this Code, approval shall require a determination that:

1. The cumulative operational intensity of the Sober Living Homes will not materially exceed infrastructure capacity serving the surrounding neighborhood;
2. Emergency vehicle circulation, staging, and response access will not be materially impaired by cumulative vehicle activity, parking demand, or site operations;
3. The concentration will not result in institutional or campus-style operational characteristics inconsistent with the intent of Residential Zones, including but not limited to: centralized or shared staffing operations across multiple sites; coordinated patient or resident intake, transport, or transfer between nearby facilities; shared commercial-grade kitchen, laundry, maintenance, or medical services; signage, lighting, or security infrastructure of a commercial or institutional character; regular use of passenger vans, shuttle vehicles, or fleet transportation for residents or staff; and any pattern of coordinated activity between facilities that collectively functions as a single institutional

operation distributed across multiple residential parcels. The review shall also consider whether the concentration of facilities generates a cumulative pattern of high-frequency resident turnover that produces recurring operational impacts on the surrounding neighborhood, including but not limited to frequent move-in and move-out activity, repeated intake and discharge processing, recurring admissions-related vehicle traffic, and a volume of transitional operational activity that is inconsistent with the settled patterns of use characteristic of Residential Zones;

4. Cumulative parking demand, traffic generation, refuse handling, deliveries, staffing presence, and visitor activity remain compatible with surrounding residential development;
5. The concentration of facilities will not result in disproportionate demand on municipal services relative to other permitted residential uses within the zone.

An operational management plan addressing traffic circulation, emergency access, refuse handling, deliveries, and exterior activity shall be submitted as part of the application.

(g) Operational Standards and Good Neighbor Requirements.

Each Sober Living Home subject to this Section shall comply with the following operational standards, which are intended to protect both surrounding residents and the health, safety, and welfare of facility residents:

1. The facility shall designate a responsible on-site operator or house manager who shall serve as a twenty-four-hour point of contact for the City, emergency services, and neighboring residents.
2. The facility shall maintain and post on-site a written good neighbor policy directing residents to be considerate of surrounding neighbors, including refraining from excessively loud, disruptive, or obnoxious behavior that would unduly interfere with a neighbor's use and enjoyment of their property.
3. The facility shall establish and maintain a written complaint protocol, including a publicly available telephone number and email address, for receiving and responding to neighbor concerns within a reasonable time.
4. The facility operator shall maintain current records of house rules, residency agreements, and program participation requirements, which shall be made available to the City upon request for purposes of verifying compliance with this Section.
5. The facility shall adopt written policies governing visitor access, parking, quiet hours, smoking areas, and exterior activity that are consistent with the residential character of the surrounding neighborhood.

6. Upon discharge of any resident, the facility operator shall provide or arrange appropriate transition assistance, which may include transportation, to prevent displacement of former residents into the surrounding neighborhood without adequate support.

Failure to comply with the operational standards set forth in this Subsection shall constitute grounds for revocation or modification of any Conditional Use Permit issued pursuant to this Section.

(h) Reasonable Accommodation.

Nothing in this Section shall preclude reasonable accommodation as required by federal or state law.

(i) Severability.

If any provision of this Section is held invalid by a court of competent jurisdiction, such invalidity shall not affect the remaining provisions, which shall remain in full force and effect.

Suggested Transmittal Note

Submitted under Council File No. 25-1484 for review and analysis regarding legal sufficiency, consistency with state and federal law, and fair housing implications.