CITY PLANNING COMMISSION SACRAMENTO, CALIFORNIA MEMBERS IN SESSION:

ITEM # <u>2</u> March 12, 1998 PAGE 1

P97-080 - El Hogar Guest House

REQUEST:

- A. Environmental Determination: Negative Declaration
- B. Special Permit to locate a 1,008 ± square foot clinic for mentally ill homeless persons in an existing warehouse building consisting of 79,500 ± square feet in the Heavy Commercial/ Warehouse -Richards Blvd. Special Planning District (C-4 SPD) zone.

LOCATION:

1400 C Street, near North 12th Street

APN 002-0020-016

Central City Community Planning Area

Council District 1

APPLICANT: Tina Thomas, 443-2745

Remy, Thomas and Moose

455 Capitol Mall

Sacramento, CA 95814

OWNER: Moe Mohanna

1025 9th Street

Sacramento, CA 95814

PLANS BY Jon Westphal, Architect

5749 El Camino Avenue

Carmichael, CA 95608

APPLICATION FILED: August 5, 1997

STAFF CONTACT: Doug Holmen, 264-8267

<u>SUMMARY</u>: The applicant is requesting the necessary entitlements to relocate a previously approved clinic for mentally ill homeless people from 1321 North C Street to 1400 North C Street. The issues associated with this request is the relocation of this facility without prior planning approval, whether or not this relocation is considered an expansion, and whether or not this relocation is in compliance with the Social Services Siting policies and siting criteria and good neighbor guidelines.

<u>RECOMMENDATION</u>: Staff recommends approval of the requested entitlements subject to conditions. The relocation of the clinic known as the "Guest House" from its former

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location at 1321 North C Street (the Loaves and Fishes complex) provides a separation from services serving young children at the Loaves and Fishes complex, and is consistent with policy which promotes collocation of services to enhance efficiency and reduce costs in the delivery of services.

#### **PROJECT INFORMATION:**

General Plan Designation:
Community Plan Designation:

Existing Land Use of Site:

Existing Zoning of Site:

Special Planning District Service Commercial

Warehouse

Heavy Commercial/Warehouse-Richards

Boulevard. Special Planning District (C-4-

SPD)

Surrounding Land Use and Zoning:

North: Homeless facilities, warehousing; C-4- SPD

South: Warehousing, retail; C-4-SPD

East: Warehousing; C-4-SPD

West: Open Space (Friendship Park), retail (across 12th Street); C-4-SPD

Property Dimensions: 200' x 140'

Property Area:  $2.479 \pm \text{gross acres}$ 

Square Footage of Building: 79,500 ± square feet (office use: 1,008 ±

square feet)

Height of Building:  $20 \pm \text{ feet, one story}$ 

Exterior Building Materials: Brick

Roof Material: composition

Parking Provided: Zero

Parking Required: To be determined by Planning Commission

OTHER APPROVALS REQUIRED: In addition to the entitlements requested, the applicant will also need to obtain the following permits or approvals, including, but not limited to:

<u>Permit</u> <u>Agency</u>

Building Permit Building Division

BACKGROUND INFORMATION: On April 14, 1988, the City Planning Commission approved several entitlements (P88-078) which legally established existing and proposed programs for the homeless population to be located at 1321 North C Street. The El Hogar Guest House was one of the Special Permits that was approved. In 1989 and 1990, staff approved two minor modifications to the above special permit. These modifications included the establishment of Mustard Seed School in one of the previously approved nine rental cottage units; and the swap in locations between St. John's homeless women

shelter and Maryhouse.

In 1995, the City received several complaints regarding the expansion of the Loaves and Fishes facility located on North C Street. Staff inspected the Loaves and Fishes site and identified several building, fire, and zoning code violations. The El Hogar facility was discovered at this time to be in violation of the zoning code since it had relocated across the street to 1400 North C Street without receiving a special permit for the new location.

In 1995, Loaves and Fishes submitted an application (P95-079) modifying their previously approved special permits and requested a special permit for El Hogar at 1400 North C Street. This project was withdrawn prior to City Planning Commission action. In 1996, a revised application (P96-055) was submitted which addressed modifications to the special permit for services in which Loaves and Fishes had direct involvement. At that time, Loaves and Fishes informed all other service providers utilizing its facilities that they would have to pursue their own special permits. This application was also withdrawn prior to City Planning Commission action.

Since these violations were not resolved through the planning process, the City filed suit against Loaves and Fishes and the various providers utilizing the Loaves and Fishes facilities. El Hogar was one of the providers identified in the lawsuit. This request for a Special Permit is the result of the Settlement Agreement in City of Sacramento v. Sacramento Loaves and Fishes, et al. (Sacramento Superior Court No. 97AS00287), which required Loaves and Fishes and/ or El Hogar to submit a Special Permit application within 120 days from the dismissal of the lawsuit.

The applicant proposes to use the office portion  $(1,008 \pm \text{square feet})$  for a homeless mentally ill clinic which will administer to up to eight clients at a time. This project employs two staff: an on-site service coordinator and a psychiatrist. There also is proposed to be student intern volunteers and volunteers assisting with reception. The clinic will be open Mondays through Fridays from 9 a.m. to 5 p.m. No drugs will be involved with the program's operation, although the psychiatrist may write prescriptions. The goals of the Guest House program are to provide geographically accessible satellite outpatient mental health services to the homeless and mentally ill; to provide collocated services in cooperation with other homeless service providers; and to assist the mentally ill homeless transition to geographical Regional Support Teams for ongoing treatment, resocialization, and transition out of homelessness. The program at this site is helping to meet these overall goals. The Guest House program is a State- certified Medi-Cal service provider and is subject to inspection and recertification every two years.

The original location of El Hogar was located among other small cottages which serve as housing and school facilities for clients of Loaves and Fishes. This was not a compatible use with the other facilities. Mentally ill homeless adults would wait for appointments outside the small cottages and would interact with the children going to the Mustard Seed school and with the children's homeless mothers would stay at the Maryhouse day care

facility which was also located next to the cottages. Loaves and Fishes placed the administrative offices for the Mustard Seed school program into the cottages occupied by the El Hogar Guest House and subleased the office space of the warehouse it leases across North C Street (1400 North C Street) to the Guest House.

STAFF EVALUATION: Staff has the following comments:

### A. Policy Considerations:

The General Plan and Community Plans do not specifically address policies relating to social service facilities. El Hogar Guest House is considered a non-residential care facility by definition in the City's Zoning Ordinance. A non-residential care facility is allowed by Special Permit in any zone in the City. Staff has used the following adopted policies and draft social services criteria to evaluate the project.

1. Richards Boulevard Area Plan Social Service Policy (M93-118, M93-119, M93-123; Resolution No. 94-736, December 13, 1994)

"Consolidate social service providers within the Richards Boulevard planning area. Provide a multi-service social service campus in the area generally bounded by 12th and 16th Streets, North A Street, and the Southern Pacific mainline right-of-way."

The El Hogar "Guest House" is not supportive of this policy since the location is outside the identified area.

2. <u>City Council Resolution regarding the Policy on Facilities on the Homeless and Transient Persons in the Richards Boulevard Area (Resolution No. 89-544, June 27, 1989)</u>

The policy states: "It is the policy of the City to generally not favor in the Richards Boulevard Area;

- a) Establishment of any new social service program or facility to serve indigent, homeless or transient persons; or,
- b) Geographical expansion of any existing facilities in the Richards Boulevard area used for provision of such services. (For the purposes of this section, recognized existing facilities include the Salvation Army facility, the Union Gospel Mission, Loaves and Fishes, including all of its approved, and the Transitional Living and Community Support Outreach Center. It is further recognized that irrespective of this policy, Loaves and Fishes may be allowed to acquire such adjacent properties

as may be necessary to facilitate improved internal operations of its existing programs.)"

The relocation of El Hogar is supportive of subsection "a" because El Hogar is a legally established use in this area and is not a new social service use.

It is not supportive of subsection "b" because the project is a geographic expansion of an existing program.

# 3. <u>Social Services Siting Criteria Policies (conceptually approved by the City Council December, 1997)</u>

In December, 1997, the City Council approved "in concept" policies regarding "fair share" siting for social services. Many of the policies relate directly to the siting of social services, but several policies are not applicable to a specific project or location and are not listed here.

The relocation of El Hogar is supportive with the following policies:

- "Promote the use of the 'Good Neighbor Guidelines and Process' early in the planning process for new facilities and also consideration for existing facilities."
- "Promote collocation of services as a way to enhance efficiency and reduce costs in the delivery of services."
- "Pursue better enforcement of operating standards and more accountability by service providers and other businesses.

The relocation of El Hogar is not supportive of the following policies:

- "Promote decentralization of social services as a means to improve accessibility and to reduce impacts."
- "Protect clients and neighborhoods by not placing 'at risk' clients in areas with concentrations of crime or substandard housing conditions."

# 4. <u>Draft Social Service Siting Criteria</u>

Social Service Siting Criteria were drafted by an appointed focus group of representatives from the various neighborhoods, businesses, facility operators, and government related agency personnel. Although the criteria

has not been officially adopted by the City, the following table gives an indication of how the criteria relate to the location of a group counseling service at the El Hogar Guest House location. The El Hogar Guest House would be considered a Group Counseling Service by definition in the Draft Social Service Siting Criteria. It is a non residential care facility in the existing zoning ordinance.

**Group Counseling Service** 

Group Counseling Service	1
理 Draft Siting Criteria: 由 由 由 由 由 由 由 由 由 由 由 由 由 由 由 由 由 由 由	Supports
Zoning Conformity	
Heavy Commercial/ Warehouse (C-4)	Yes
Spacing Standards	4 P
1,000 feet from another social service facility (measured from Loaves and Fishes complex)	No
500 feet from a residentially zoned area, schools, community centers, and parks (measured from the Mustard Seed School)	No
Operational Standards	## 1
Setbacks (None re required)	Yes
Height (75 feet)	Yes
Parking 1:200 (5 spaces)	Yes
Lighting (meet police standards)	Yes
Business Practices	
All services occur inside a building	Yes
Adequate waiting space is provided inside	Yes
Adequate and Accessible bathrooms are provided inside	Yes .
Trash Receptacles are readily available in and outside	Yes
Service activities do not rely on using the public right of ways (Parking is on street)	No

# B. Staff Analysis

# 1. Special Permit

A special permit allows the City to review projects as to their compliance with required findings of fact regarding sound principles of land use; will not be a detriment to the public health, safety or welfare, or result in the creation of a nuisance; and complies with General Plan policies.

The location of the El Hogar Guest House complies with sound principles of land use for the following reasons:

- Non residential care facilities are conditionally accepted in the Heavy Commercial/ Warehouse Zone.
- The facility meets the operational standards and business practices of the draft Social Services Siting Criteria.
- The facility complies with the City Council conditionally approved Social Service Siting Criteria policy which states: "Promote collocation of services as a way to enhance efficiency and reduce costs in the delivery of services."

#### Good Neighbor Policy

The "Good Neighbor Policy and Guidelines" provides a process for an applicant of a social service facility to meet with affected neighborhood and business groups to work out issues of a proposed location, and operations of a facility. Although compliance with the "Good Neighbor Policy and Guidelines" is not a requirement of an applicant, it was suggested that representatives of El Hogar meet with representatives from the surrounding midtown neighborhood groups and individuals to discuss the facility and its impact on the surrounding area.

El Hogar participated in the "Good Neighbor" process by meeting with neighborhood representatives. The neighborhood representatives were supportive of allowing the facility to locate at 1400 North C Street. They recognize the importance of this facility, believe the operators- Volunteers of America- provide responsible management, and understand that there should be separation between a mentally ill clinic and services for children.

# 3. Parking

The warehouse in which El Hogar is located is given a parking credit of 80 parking spaces. This is based on the zoning code requirement of providing one space for every 1,000 square feet of floor area in a warehouse. Although a complete floor plan of the warehouse has not been provided, staff has been provided with information that the office use in this warehouse does not exceed 25%. El Hogar will be utilizing 1,008 ± square feet of the office area in the warehouse. The Zoning Code requires a use such as El Hogar (group counseling or medical office) to provide one space for every 200 square feet of gross area. Therefore, El Hogar would be required to provide six parking spaces. El Hogar was part of the original Loaves and Fishes Special Permit (P88-078) when the complex was assigned 40 parking spaces. There has not been any change of uses or expansion of existing uses occur with this relocation. The Mustard Seed program expanded its administrative offices into the cottage area that El Hogar originally occupied. There was no increase in staff. Staff of El Hogar would still be provided the original parking spaces. Also, the mentally ill homeless adults coming to El Hogar for counseling, will in all probability not be arriving by motor vehicle. Based on the above information, staff has determined that there is sufficient parking provided for El Hogar.

# PROJECT REVIEW PROCESS:

# A. Environmental Determination

The Environmental Services Manager has determined the project, as proposed, will not have a significant impact to the environment; therefore, a Negative Declaration has been prepared.

# B. <u>Public/Neighborhood/Business Association Comments</u>

The project was routed to several neighborhood groups including Richards Boulevard PAC, Central City Alliance of Neighborhoods (CCAN), Alkali Flat PAC, Sacramento Old City Association (SOCA), The Neighborhood, Washington Park Neighborhood, Boulevard Park Neighborhood, and Midtown Business Association. The following comments were received:

Richards Boulevard PAC: The Richards Boulevard PAC was not in support of this project and consider this an expansion of the Loaves and Fishes complex. They see the homeless facilities as contributing to the blighting affect in the area.

Capitol Station District: The Capitol Station District is opposed to any expansion

of social services in the Loaves and Fishes complex (see letter in Exhibit 1C).

Alkali Flat PAC: The PAC could not officially take action on this project, but were favorable towards it.

Midtown Neighborhood Groups: These groups were supportive of this use. A meeting was held on November 12, 1997 between El Hogar representatives and representatives from the midtown neighborhoods to discuss the relocation of the facility. Staff facilitated the meeting. After questioning the representatives of El Hogar, the neighborhood representatives did not have any concerns regarding the El Hogar program. It was recognized that the program was originally approved for the Loaves and Fishes "campus" and that its new location makes better sense than the previous location. No additional conditions were asked for.

# C. Summary of Agency Comments

The project has been reviewed by several City Departments and other agencies. The following summarizes the comments received:

**Building Division**: Additional information needs to be provided to determine building occupancy. Change in occupancy shall require full compliance with electrical, mechanical, plumbing, and building codes.

Fire Department: No objections as long as the Building Department requirements are met.

<u>PROJECT APPROVAL PROCESS</u>: The Planning Commission has the authority to approve or deny the Special Permit. The Planning Commission action may be appealed to the City Council. The appeal must occur within 10 days of the Planning Commission action.

<u>RECOMMENDATION</u>: Staff recommends the Planning Commission take the following actions:

- A. Adopt the attached Notice of Decision and Findings of Fact ratifying the Negative Declaration;
- B. Adopt the attached Notice of Decision and Findings of Fact approving the Special Permit to locate a 1,008 ± square foot clinic for mentally ill homeless persons in an existing warehouse building consisting of 79,500 ± square feet in the Heavy Commercial/ Warehouse -Richards Blvd. Special Planning District (C-4 SPD) zone.

Report Prepared By,

Report Reviewed By,

Doug Holmen

Associate Planner

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Steve Peterson

Senior Planner

# **Attachments**

Attachment 1 Notice of Decision & Findings of Fact

Exhibit 1A Site Plan

Exhibit 1B Good Neighbor Guidelines

Exhibit 1C Letter from the Capitol Station District

Attachment 2 Vicinity Map

Attachment 3 Land Use & Zoning Map

# **ATTACHMENT 1:**

#### NOTICE OF DECISION AND FINDINGS OF FACT FOR

#### **EL HOGAR GUEST HOUSE**

LOCATED AT 1400 NORTH C STREET
SACRAMENTO, CALIFORNIA IN THE
HEAVY COMMERCIAL/ WAREHOUSERICHARDS BOULEVARD SPECIAL PLANNING DISTRICT ZONE. (C-4- SPD)
APN: 002-0020-016

At the regular meeting of February 12, 1998, the City Planning Commission heard and considered evidence in the above entitled matter. Based on verbal and documentary evidence at said hearing, the Planning Commission took the following actions for the location listed above:

- A. Environmental Determination
- B. Approved the Special Permit to locate a 1,008 ± square foot clinic for mentally ill. homeless persons in an existing warehouse building consisting of 79,500 ± square feet in the Heavy Commercial/ Warehouse -Richards Blvd. Special Planning District (C-4 SPD) zone.

These actions were made based upon the following findings of fact and subject to the following conditions:

#### FINDINGS OF FACT

- A. <u>Negative Declaration</u>: The Negative Declaration is approved for the proposed El Hogar Guest House based upon the following findings:
  - 1. The Negative Declaration was prepared and circulated for the aboveidentified project pursuant to the requirements of CEQA;
  - The proposed Negative Declaration and comments received during the public review process were considered prior to action being taken on the project; and
  - 3. Based upon the Initial Study and the comments received during the public review process, there is no substantial evidence that the project will have a significant effect on the environment.

- B. <u>Special Permit</u>: The Special Permit for the proposed El Hogar Guest House (Exhibit 1A) on a 2.479 ± developed acres site is hereby approved based upon the following findings of fact:
  - 1. The Special Permit, as conditioned, is granted upon sound principles of land use in that:
    - a. Non residential care facilities are conditionally accepted in the Heavy Commercial/ Warehouse Zone.
    - b. The facility meets the operational standards and business practices of the draft Social Services Siting Criteria.
    - c. The facility complies with the City Council conditionally approved Social Service Siting Criteria policy which states: "Promote collocation of services as a way to enhance efficiency and reduce costs in the delivery of services."
  - 2. The Special Permit, as conditioned, will not be detrimental to the public health, safety or welfare, or result in the creation of a nuisance in that:
    - a. The Staff will continue to follow the Good Neighbor process and guidelines as conditioned.
    - b. The facility complies with the City Council conditionally approved Social Service Siting Criteria policy which states: "Pursue better enforcement of operating standards and more accountability by service providers and other businesses."
  - 3. The proposed project is consistent with the land use policies of the General Plan in that:
    - a. The use is conditionally allowed in a Heavy Commercial/ Warehouse area.
    - b. Care facilities are permitted in a Special Planning District with a special permit.
    - c. Care facilities are permitted in a Special Planning District with a special permit.

#### **CONDITIONS OF APPROVAL**

C. The Special Permit is hereby approved subject to the following conditions:

- C1. The applicant shall obtain all necessary building permits to bring the existing office space up to Building Code standards within 30 days of approval of this project or within an additional period of time to the satisfaction of the Planning Director.
- C2. The applicant shall comply with the following conditions which were conditions of P88-078:
  - Days and hours of operation shall be limited to 9 a.m. to 5 p.m.
     Monday through Friday.
  - Capacity shall be limited to no more than eight clients at any one time who are chronically mentally ill.
  - A licensed professional counselor shall manage the program.
  - No drugs are to be involved in the program's operation.
- C3. Prepare a Good Neighbor Plan based on the "Good Neighbor Guidelines" (Exhibit 1B). The Good Neighbor Plan shall be subject to review and approval by the Planning Director, and shall include at least the following:
  - a. Within 1 month of project approval, or by no later than April 30, 1998, the facility operator shall conduct a "get acquainted" meeting with the businesses generally located within a four block radius from the project site, representatives from the Alkali Flat PAC and Capitol Station District, and residential neighborhood representatives from the Neighborhood Action Alliance Group (NAAG) who represent the area. The meeting shall occur at the subject site to introduce the facility operations to the neighbors and to provide emergency phone number(s) of contact person(s).
  - b. For the next 16 months following project approval, the facility operator shall hold community meetings once every four months. (The facility operator may cooperate with an existing neighborhood organization to arrange and notice these meetings.) The meetings shall be conducted to receive community comments and concerns and to implement solutions. The facility operator shall notify the Planning Director of the meeting date, time, and place, at least two weeks prior to the meeting date. An attendee list and meeting minutes shall be submitted to the Planning Director or designee within one week following the quarterly meeting.
  - c. After the 16 month period, the facility operator shall meet with community organizations, neighborhood representatives, and/or

individual property owners/occupants, as requested, on a case-by-case basis.

- d. The following management practices shall be followed beginning now:
  - Prohibit loitering.
  - Provide for litter control.
  - Establish and post hours of service.
  - Graffiti will be removed as soon as possible from the facility.
  - Keep buildings and grounds clean.
  - Post contact person for 24 hour response to problems.
  - Referral information on community services should be made available to clients as needed and appropriate. Service providers shall deliver services in a manner that enhances client's self reliance.

ATTEST:

CHAIRPERSON

SECRETARY TO CITY PLANNING COMMISSION

DATE (March 12, 1998)

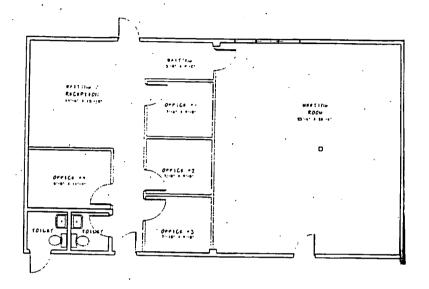
#### **Attachments**

Exhibit 1A Site Plan

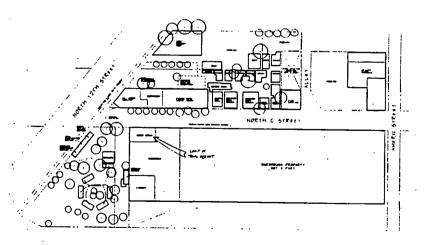
Exhibit 1B Good Neighbor Guidelines

Exhibit 1C Letter from the Capitol Station District

Exhibit 1A Site Plan



EXISTING FLOOR PLAN



LOAVES AND FIGHER MASTER PLAN

Exhibit 1B Good Neighbor Guidelines

# **GOOD NEIGHBOR GUIDELINES**

The Good Neighbor Guidelines were developed through a collaborative process which include service providers, neighborhood representatives, government, and clients. Using these guidelines provides a sound foundation for operating in a compatible manner within the neighborhood. The guidelines consist of elements to achieve effective two-way communication, recommended management practices, performance standards, and design factors.

To effect a two-way communication between the provider and the neighbors, it is recommended that the provider:

- Establish a process for neighbors to communicate directly with the agency board as well as the providers being invited to be part of the neighborhood or business organizations.
- Hold "Good neighbor- open house" forums to insure ongoing communication.
- Give the neighbors the name of the contact person (who has authority) for service provider.

The recommended management practices are:

- Develop and implement a security plan that will ensure safe and orderly operation within the facility and the immediate vicinity as developed through the Good Neighbor process.
- Apply sanctions and/ or terminate clients who have repeated violations of facility rules which will include violations in the neighborhood unless prohibited by law (use "social nuisance ordinance" criteria).
- Prohibit loitering.
- Provide for control of litter.
- Establish and post hours of service.
- Graffiti will be removed as soon as possible from the facility.
- Keep buildings and grounds clean.
- Stagger appointments and use technology with the purpose of eliminating onsite congestion.

- Take complaints seriously, respond immediately, and provide feedback on action taken by service provider.
- Post contact person for 24 hour response to problems.
- Referral information on community services should be made available to clients as needed and appropriate. Service providers shall deliver services in a manner that enhances client's self reliance.

The recommended performance standards for the Good Neighbor Guidelines are:

- Performance standards are reasonable and understood by all parties.
- Terminate contracts with providers who violate terms of agreements. Those providers not under contract should have use permit revoked.
- Determine due process for termination of contracts and use permits including notice and reasonable time to correct.
- Contract between government and service providers to include good neighbor clause.
- A review process for zoning permits and a defined complaint process for neighbors.
- Use incentives and disincentives for permit granting and reviews.
- Offer responsive programs that meet the needs of the specific clients.
- Clients to be free of behavior associated with excessive drug and alcohol use.

The following aesthetics and design factors are:

- Design, size, and operate a facility to blend in with neighborhood.
- Provide adequate waiting areas inside facility and in the outside courtyard.
- The provider will provide adequate indoor restrooms.
- Small, localized facilities are preferred.
- Develop guidelines for facility design which are compatible with both the City and County buildings and use codes.

- Design facilities that are appropriate for the intended use.
- Facilities must be designed to meet the requirements of the recipients.
- Provide smoking areas outside in internal courtyards.

After one year an evaluation of the Good Neighbor Policy shall occur to identify the effects on social service providers and neighborhoods. Recommendations for improvement shall be considered. Data collection will be collected for assessment.

Exhibit 1C Letter from the Capitol Station District

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# CSD

Capitol Station District

501 North 10th Street

Sacramento, CA 95814

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fax 916.553.9281

February 9, 1998

Sacramento City Planning Commission c/oDoug Holmen City of Sacramento Planning Division 1231 I Street, Suite 300 Sacramento, CA 95814

Dear Planning Commissioners,

RE: P97-080

The Capitol Station District, Inc. is a nonprofit business organization promoting the economic and cultural well-being of the Richards Blvd. redevelopment district. The North 12th and 16th street triangle is of particular importance to the revitalization of our district, because it is our commercial and retail anchor as well as the gateway into and from downtown. In surveying businesses, property owners and residents of the area, we have found that, almost unanimously, their number one concern is the negative effect that the transient population, most particularly, Loaves & Fishes "guests," have on their neighborhood.

Clearly, the Richards Blvd. redevelopment area shoulders more than its share of the burden of providing food, shelter and necessary services to the homeless and hungry in our region. We are cooperating with social service providers in our district to improve efficiency and accountability in delivery of services, and to mitigate as much as possible any negative effects, including crime, vagrancy, garbage and toileting problems, panhandling, and public intoxication.

However, it is our position that there should be a firm limit, if not a reduction, on the social services in the district, and that other communities and municipalities should share the responsibility for helping those in need. There should be no new or expanded programs until the problems caused by current programs are resolved. In addition, we need to be sure that the children and teenagers who seek services at Loaves & Fishes are separated from any dangers posed by "guests" who are mentally ill, substance abusers, potentially violent, etc.

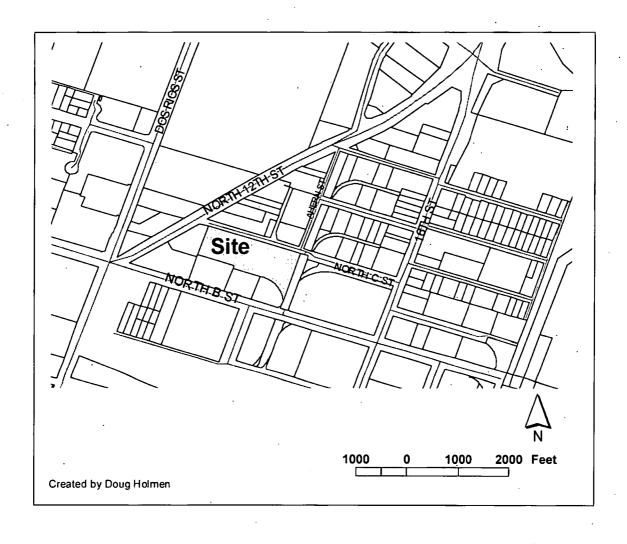
We oppose El Hogar's application for a permit to operate a mental health facility at the Loaves & Fishes complex and urge the Planning Commission to do the same.

Yours truly,

Connie Miottel
Executive Director

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Attachment 2 · Vicinity Map



Attachment 3 Land Use and Zoning Map

