

December 5, 2025

Carl Nadela, AICP, Principal Regional Planner
Puente Whittier Development Services

SUBJECT: REQUEST FOR INFORMATION FOR PROJECT NUMBER R2014-02985-(4), CONDITIONAL USE PERMIT 201400140, MINOR PARKING DEVIATION RPPL2025003832

Dear Mr. Nadela,

Project Number R2014-02985-(4) is scheduled for public hearing on December 16, 2025. After reviewing the Hearing Officer package for the item, I have the following comments. Please be prepared to address these comments at the hearing. I ask that you forward this memo to the applicant/owner and ensure this memo is posted on the public website for the item. Additional questions may follow depending on responses at the hearing.

According to the staff report, the Project is for the legalization of the conversion of an existing accessory Single-Family Residence and a portion of an existing church to a sober living facility for adult men recovering from substance abuse, with 22 residents and six total staff (three on daytime shift and three on nighttime shift). The staff report indicates that only “counseling services” are provided to the residents.

Under state law:

- California Health and Safety Code (HSC) section 11834.02 defines an “alcohol or other drug recovery or treatment facility” as a premises that provides 24-hour residential nonmedical services to adults recovering from alcohol or drug misuse who need recovery treatment or detoxification services.
- Title 9, California Code of Regulations (CCR) section 10501 defines “alcoholism or drug abuse recovery or treatment services” to include one or more of the following:
 - **Detoxification Service:** A service designed to support and to assist an individual in the alcohol and/or drug withdrawal process and to explore plans for continued service;
 - **Group Session:** Group interaction that encourages residents to identify and resolve alcohol- and/or drug-related problems, to examine personal attitudes and behavior,

- and provides support for positive changes in life style and recovery from alcoholism and/or drug abuse;
 - **Individual Session:** Private interaction between a resident and program staff which focuses on identification and resolution of alcohol- and/or drug-related problems, to examine personal attitudes and behavior and other barriers to recovery;
 - **Educational Session:** Planned, structured, didactic presentation of information related to alcoholism and alcohol or drug abuse; and/or
 - **Alcoholism or Drug Abuse Recovery or Treatment Planning:** The development of a resident specific goal and a continuum of recovery or treatment objectives. It is the licensee's responsibility to provide the activities to facilitate this process.
- Once a facility provides any such services, it qualifies as a licensed “recovery or treatment facility,” and may not operate without a valid license from California Department of Health Care Services (DHCS).

Accordingly, to determine whether the subject facility is properly characterized as an unlicensed sober living facility or instead must be treated as a licensed recovery or treatment facility, please clarify the following:

- Who exactly provides the “counseling services”? Are they provided by the six staff members identified in the staff report?
- Are the “counseling services” provided in a structured format, as opposed to informal peer support, communal living, house-meetings, or house-rule enforcement?
- Do these “counseling services” include any of the following categories defined in Title 9, CCR section 10501: detoxification; group sessions; individual sessions; educational sessions; and/or recovery or treatment planning?
- If yes to any of the above, the facility would meet the definition of a “recovery or treatment facility” under HSC section 11834.02 and be subject to licensing by DHCS. Furthermore, it would meet the definition of a “residential substance use recovery facility” pursuant to Section 22.14.180 (R) of Title 22 (Planning and Zoning) of the Los Angeles County Code. As such:
 - The staff analysis, findings, and conditions of approval should characterize it as a residential substance use recovery facility and not as an unlicensed sober living facility; and
 - A condition of approval should be added to ensure that all development pursuant to the grant shall comply with all state licensing requirements.

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Sincerely,

A handwritten signature in cursive script that reads "Tina Fung".

Tina Fung
Hearing Officer