

## HOUSING AND HOMELESSNESS

Because the home is the center of family life, a significant amount of Task Force research focused on housing problems experienced by families in Los Angeles. The housing issues which most often came to the attention of the Task Force involved the homelessness of adults, families, and teens, inadequate and substandard housing, unaffordable housing, and housing discrimination — all of which are discussed in this chapter of the report.

### Homelessness

The issue of homelessness seems to be a persistent problem with which California lawmakers have grappled for years. During the New Deal era, for example, the California Legislature confronted the problem by enacting the Housing Authorities Law, an effort to provide safe housing for low-income individuals and families.<sup>1</sup>

In 1970, the Legislature expressed its concern that the housing needs of low-income people were not being met. It declared that a decent home and a suitable living environment for every family was a "priority of the highest order."<sup>2</sup>

As recently as 1984, the Legislature again recognized that "because of economic, physical, and mental conditions that are beyond their control, thousands of individuals and families in California are homeless."<sup>3</sup>

In the City of Los Angeles, the demand for emergency shelter for the homeless increased by 50% during 1986, by far the biggest rise among the 25 major cities surveyed by the United States Conference of Mayors.<sup>4</sup> According to Mayor Tom Bradley, an estimated 33,000 people in the city are homeless.<sup>5</sup>

The characteristics of the homeless do not fit neatly into one package. If the homeless in Los Angeles match the national profile, then 56% of them are single men, 15% are single women, and 28% are families with children.<sup>6</sup> According to one city agency, the stereotypical substance abusers and chronically mentally ill persons have been joined by so-called "throw away" street youth, "new poor" and battered women — all of whom are living on the city's streets, camping on sidewalks and under ramps, and living in automobiles.<sup>7</sup>

For purposes of analysis, this report separates the homeless into three groups: single adults, families, and teenagers. Although there are sometimes overlapping themes to the problems experienced by these groups, the causes and solutions are not necessarily the same for each category.

#### *Homeless Adults*

One very visible manifestation of homelessness involves adults sleeping on city streets and other public places. Because some city officials and many businesses and residents find the so-called "Skid Row" encampments intolerable, last year the Chief of Police and the Mayor announced a plan to clean up Skid Row.<sup>8</sup> Under the plan, sidewalk sleepers were warned that their conduct violated the city's pedestrian traffic ordinances. If they persisted in camping out on the sidewalks, they were threatened with arrest. Police officers offered housing vouchers as an alternative to arrest.

The plan was not without its critics. The Los Angeles City Council asked Police Chief Darryl Gates not to arrest people for sleeping on the streets if no alternative housing was available. The council also asked the City Attorney to initiate a lawsuit against the county for providing inadequate assistance to the homeless.<sup>9</sup>

Councilwoman Ruth Galanter was able to delay police sweeps of the estimated 2,500 persons living on the streets and beaches of the Venice area. In an attempt to find solutions and examine alternatives, she conducted community hearings at which local residents, business owners, social service agencies, and homeless people all presented their views.<sup>10</sup>

Los Angeles City Attorney James Hahn refused to file charges against persons arrested merely because of their homelessness, on the ground that not enough alternative housing is available.<sup>11</sup>

As a short term solution, Mayor Bradley proposed a temporary "urban campground" on vacant land owned by the Rapid Transit District.<sup>12</sup> The number of persons living at the camp grew from about two dozen to more than 500 within three weeks.<sup>13</sup> In addition to alcoholics and drug addicts, estimated to comprise 30% of the city's homeless,<sup>14</sup> the camp included unemployed persons looking for work.<sup>15</sup> During the four months of the camp's existence, more than 2,600 persons used its facilities and services.<sup>16</sup>

Last year, before the scheduled closure of the only two shelters for the homeless, other than the campground, the City Attorney sponsored a study of shelter residents. The study has provided city officials with data necessary to coordinate an intergovernmental strategy to address the crisis of homelessness in the Los Angeles area. The study was completed in June, 1987.<sup>17</sup>

The study found that the typical shelter resident was a poverty stricken, unmarried black male in his mid-thirties, who had been a resident of Los Angeles for nine years and had been homeless for about six months.<sup>18</sup> While he was homeless, he had lived in shelters, missions, or outdoors.

The causes of the homelessness of these men included unemployment, physical or psychiatric disabilities, and substance abuse, with unemployment as the primary cause. Most had held a permanent job for more than three years but had not worked in the previous 18 months. About one-third of the residents had a permanent disability which prevented them from working. About 30% had a history of substance abuse. Ten percent showed evidence of severe psychiatric disabilities.<sup>19</sup>

Often, the trauma of homelessness has had other serious side effects, including hunger and vulnerability to crime and violence. Forty percent have suffered from severe depression requiring clinical intervention. Seven percent were actively suicidal at the time of the survey.<sup>20</sup>

In addition to findings and recommendations pertaining to county responsibilities and services, the City Attorney study made the following observations and recommendations with respect to city policies and programs.<sup>21</sup>

**Low Cost Housing.** The ultimate cause of homelessness is a shortage of low-income housing units. As long as there are more poor people or poor households than there are low-cost housing units, there will be a

housing shortage, and the homelessness resulting from the housing shortage will continue. The study recommended that the city require full replacement of any low-income housing units scheduled to be removed from the total housing stock before demolition of the units, rather than partial replacement after the demolition of the units, as is now often the case.

**Employment Development.** There exists a strong connection between unemployment, poverty, and homelessness. The majority of homeless adults in the survey did not have housing because they could not afford it. They could not afford housing because they did not have steady, full-time jobs. The study recommended more programs encouraging economic development, with an emphasis on creating jobs for minorities in job poor areas, as a way of directly decreasing poverty and indirectly decreasing the number of homeless in the central city.

**Crime Victimization.** The incidence of crime victimization of homeless adults is high. The study recommended a greater police presence in the Skid Row area, especially more officers walking the beat in pairs to safeguard the lives of the homeless.

**Emergency Assistance.** While officials seek long-term solutions to the homeless problem, current pressing needs must not be ignored. The study recommended that immediate basic necessities, such as shelter, beds, and food, be provided.

After many months of ad-hoc crisis management, the City Council recently adopted a Comprehensive Homeless Policy,<sup>22</sup> and the Mayor proposed a one-year moratorium on demolition of old Skid Row hotels which house thousands of poor people.<sup>23</sup> Last September the Mayor unveiled a \$6.3 million plan to buy prefabricated apartments to house up to 2,000 people.<sup>24</sup> The Mayor also has named a new city housing coordinator whose job it is to coordinate the efforts of private developers and various city departments, including the Community Redevelopment Agency, the Community Development Department, the Planning Department, and the City Housing Authority.<sup>25</sup> The courts have been asked to clarify the differing responsibilities of the city and the county in dealing with homelessness.<sup>26</sup>

According to the City Administrative Officer, the city spent about \$2.3 million on homeless services during the first eight months of 1987.<sup>27</sup> Some members of the City Council questioned that estimate, indicating that the actual figure could be as high as \$8 million before the year ended.<sup>28</sup> That revised estimate includes \$1.5 million for 102 mobile homes bought by the city to shelter homeless families throughout the 15 council districts as a part of the long-range solution to the homeless problem.<sup>29</sup>

Homelessness is a multi-faceted problem; real solutions will require the cooperative effort of all levels of government as well as the private sector. The federal government<sup>30</sup> and the state Legislature<sup>31</sup> must allocate sufficient funds for programs designed to aid the homeless. The Mayor, City Attorney, City Council, and County Board of Supervisors all need to take an active role. The city's new Comprehensive Homeless Policy and the Mayor's new housing coordinator are steps in the right direction. To find long-term practical solutions may require the creation of intergovernmental task forces that involve advocates for the homeless,<sup>32</sup> land developers,<sup>33</sup> private sector businesses and trade associations.<sup>34</sup>

It is clear that reliance on the judiciary to resolve the homeless crisis is inappropriate. Protracted litigation — with city and county fighting each other and the state — results in a waste of valuable resources and in long delays in the delivery of services, a situation in which both the homeless and taxpayers lose. The courts, therefore, should be used only as a last resort.

### *Homeless Families*

The Task Force received considerable testimony regarding the plight of homeless families in Los Angeles.

David Wood, a pediatrician at Venice Family Clinic, sees homeless families on a daily basis.<sup>35</sup> According to Dr. Wood, homeless families are now the largest and fastest growing segment of the homeless population. He estimated that about 20,000 families in the Los Angeles area have no place of their own to stay each night. The demand for family shelters is greater than the total number of shelter beds available in Los Angeles.

Stressing the difference between the homeless adult population and the homeless family population, Dr. Wood testified:<sup>36</sup>

Homeless singles are different from homeless families. Homeless singles . . . tend to be predominantly (96%) male. The majority have never been married. They have a high rate of mental illness (45%) and alcohol or drug abuse (34%). The average age is dropping, but it is over 30, and 40% are over 40 years-old. They live in missions (28%) or hotel/motels (25%) or on the streets (22%). Many of these men, the so-called chronically homeless, have been homeless for long periods of time.

Homeless families are very different on almost every count. They are often a single-parent household, headed by a young female less than 25 years-old. She has two-to-three children, half of whom are under 5 years-old. The majority of the mothers had children before the age of 18. There are many (two-parent) families, especially those who have migrated from out of state to find employment in Los Angeles. In a study by Travelers' Aid, 45% of the families had two parents. Mental illness in this group is characterized more by situational depression rather than schizophrenia or chronic affective disorders as in the single adults. . . . Drugs and alcohol are not common but they do often play a role in precipitating the crisis that made the family homeless. The families tend to stay with friends or relatives or live in crowded communal situations until these resources are depleted, and as a last resort they use the shelters or hotels/motels. Only a few of the families live on the streets or in cars, since it is tough to survive on the streets with children. The most outstanding difference [between single adults and families] is the length of homelessness. The majority of the families are transiently homeless, due to a recent economic or personal crisis. But the situation often becomes chronic due to the difficulty in finding affordable housing.

Dr. Wood addressed the more pressing question of why these families are homeless. Citing congressional hearings, academic research, and surveys of shelter residents, Dr. Wood listed three major reasons for the

homelessness of families: (1) scarcity of low-income housing, (2) inadequate income or public assistance benefits, and (3) an increased prevalence of personal crises. He elaborated:<sup>37</sup>

The scarcity of low-income housing appears to be the main cause of homelessness. Poor people simply cannot afford the majority of available housing in the United States. The low-income housing supply is dwindling . . . due to such factors as urban redevelopment, condominium conversions, decreased construction, increased demand from higher income renters, and the virtual elimination of federal funds for the construction of low-income housing. . . .

In addition to the housing shortage and spiraling rents, families simply do not have enough income to both eat and pay rent. In 1970, 1 in 10 American families were headed by females. In the various shelter populations which have been studied, from 55% to 85% of the families are headed by women, with 2 to 3 children each. Half of the female-headed families live below the poverty level. All of the homeless families are living below the poverty level. . . . The increase in welfare benefits has simply not kept up with the rise in housing costs. In Los Angeles, the AFDC [Aid to Families with Dependent Children] payment for a family with 2 or 3 children is from \$617 to \$734 per month. Rent will consume a minimum of \$500 to \$600 per month in Los Angeles. This leaves very little for food, clothing, utilities, transportation, and medical expenses such as medicines. A young family can spend as much as \$40 to \$80 per month on diapers and formula alone. The numbers are very tight, but when one adds a \$1,000 deposit for security and last-month's rent, the chances of getting into an apartment and staying there are very slim.

The third contributing factor to homelessness is related to the strength of the family's support network. Most families cited economic reasons for their homelessness, but one-third of the homeless families surveyed by Ellen Bassuk indicated that a personal crisis, such as a dissolved relationship with a man, battering, death, or illness had caused their state of homelessness. The mothers in Kay McChesney's study in Los Angeles commonly had no family members locally, and many had no living relatives. . . . Homeless mothers are often from [strife ridden] homes, have histories of being abused or neglected, were in foster homes, and have become full-time mothers in their teens. They have generally received little support in their own lives, thus it isn't surprising that they haven't developed supportive relationships in their own families.

Dr. Wood's testimony also underscores the effects of homelessness on children. He said that one of the major findings in the current literature on homelessness is that almost 50% of homeless children are developmentally delayed in significant ways. The lack of a sense of security experienced by the uprooted child often leads to serious anxiety disorders. Social scientists who have studied homeless children describe a myriad of other problems, including nutritional deficiencies, school absence for prolonged periods, poor hygiene and health problems, and the disintegration of the parent-child bond.<sup>38</sup>

Nancy Berlin, coordinator of the House of Ruth, a temporary emergency shelter for homeless women and children located in Boyle Heights, also presented testimony to the Task Force.<sup>39</sup> She basically agreed with Dr. Wood's profile of the typical homeless family, except that she estimated that only one-third of homeless families contain two parents, with the other two-thirds headed by single women.<sup>40</sup> Her testimony also emphasized three causes of homelessness among families: (1) lack of affordable housing, (2) lack of sufficient family income, and (3) personal crises without viable extended family support networks.

Ms. Berlin testified that about 25% of the homeless families once included an adult male. Often, these men were either abusive to the women or children, effectively forcing the women to flee with the children, or the men abandoned the family. The women generally have been out of the job market for some time. Many of them can find only minimum wage jobs insufficient to pay for adequate housing and the other necessities of life. Additionally, if they do find jobs, they can't afford to pay for child care services.

Ms. Berlin further explained about the shelter crisis:<sup>41</sup>

They [homeless women with children] are very hard to identify. They are terrified that their children are going to be taken away from them. So we are never going to get a very accurate count. However, we do believe that there are only several hundred shelter beds available to homeless families in Los Angeles county, although there are thousands of homeless women and children in the county — so there is a huge gap between these numbers.

As Legal Aid Foundation attorney Byron Gross testified, these women had good reason to fear losing their children if they came forward seeking public assistance.<sup>42</sup> Until very recently, as a matter of general policy and practice, county and state welfare programs refused to provide housing to entire families. These agencies insisted that they could only house needy children. Therefore, in order to help the children, the agencies split up the families — providing shelter for the children and leaving the parent to fend for himself or herself. It is not surprising that poverty stricken parents living in cars or make-shift abodes would do everything possible to avoid official detection.

The Legal Aid Foundation of Los Angeles and other public interest law firms filed a lawsuit challenging the position of the public agencies in the case of *Hansen v. McMahon*. The Superior Court granted the plaintiffs a preliminary injunction, requiring the agencies to provide emergency shelter without requiring the families to split up. The agencies appealed. On July 1, 1987, the Court of Appeal agreed with the trial court and condemned the practices of the agencies which caused the break-up of families.<sup>43</sup> The court ruled that the agency interpretations of relevant statutes was erroneous and "runs counter to the objective of federal and state welfare services legislation that social services be provided in such manner as to prevent the unnecessary separation of children from their families."<sup>44</sup>

The recent passage and signing into law of Assembly Bill 1733 (effective February 1, 1988), establishes by statute many of the changes required by the holding in *Hansen*. For example, it enables a homeless family receiving aid under AFDC to receive special nonrecurring needs funds, which could be used for such items as security deposits or payment of rent. The bill further imposes a state-mandated local pro-

gram, on the county level, to serve homeless families receiving aid under AFDC. To clarify the issue raised in *Hansen*, the statute provides that "emergency shelter care" under the Child Welfare Act is only available to children who have been removed from the custody of their parents or guardians. Thus, essentially, the statute imposes a duty to provide assistance to homeless families with children, but specifies that this should be done through the AFDC program, and not through Child Welfare Act services.

These witnesses suggested several ways in which the city can address the homeless family situation in Los Angeles.

**Increase Affordable Housing.** The increasing gap between housing costs and family income must be narrowed. If the city does not become more active in creating affordable family housing units, it will be burdened with the increasing cost of less effective and often degrading emergency shelter services.<sup>45</sup>

**Develop an Advocacy Program.** The city could institute a Housing Clearinghouse, to scour the city looking for affordable housing, and passing this information on to shelters located in the city. This would assist the shelter staff in matching homeless families with housing they can afford.<sup>46</sup>

**Support Private Shelters.** The city should support the funding of privately run shelters that house homeless families. The City Attorney should enforce existing fair housing laws against shelters that won't accept pregnant women, or revise laws that do not prohibit such discrimination.<sup>47</sup>

**Monitor the Implementation of A.B. 1733.** The City Attorney should monitor the county's implementation of A.B. 1733.<sup>48</sup> If the county fails to put a halt to its current policies which break up homeless families, then the Mayor and the City Council should take a strong public position opposing such anti-family government tactics.<sup>49</sup>

### *Homeless Teenagers*

Homeless youth make up a distinct class of the homeless population. Concerned about the plight of these troubled teens and young adults, the Task Force took testimony on this subject,<sup>50</sup> had help from student researchers,<sup>51</sup> and received a report prepared by a team of Task Force members.<sup>52</sup>

Thousands of homeless youth live in the Los Angeles area. Gary Yates, Director of the High Risk Youth Program at Children's Hospital, explained to the Task Force:<sup>53</sup>

In 1983, there was a study done by the Department of Health and Human Services. Their estimate is: anywhere between 750,000 and 1,500,000 young people run away from home every year in the United States. They also estimate that approximately 60% of those go home within 72 hours, but that 25% of those young people are called chronic street youth and make their living on the streets of the major urban centers of the country.

In 1981, United Way did a study here in L.A. that estimated that in the county there were approximately 10,000 young people on the streets any given day. And in Hollywood

alone they thought it was around 4,000. No one knows for sure about those numbers, but one thing that is certain is the number of shelter beds that are available for young people in Los Angeles County — and that is 24. They are short-term shelter beds. Eighteen of them are for two weeks, six are for 30 days in the Aviva Center Shelter which houses only young women who are homeless. That's the system of care that existed up until recently.

It has been estimated that 300 new runaways arrive in Los Angeles each week.<sup>54</sup> Most of these young people never ask for shelter unless the weather is very cold. The two week limitation on use of the very limited number of shelter beds deters many youth from seeking shelter assistance, except for a temporary rest and a shower.<sup>55</sup>

A great number of homeless children are runaways. Researchers have estimated that about 70% of runaway youth are fleeing from abusive families.<sup>56</sup> Some of them, and among them gay and lesbian youth, have been pushed out by parents who fail or refuse to accept their children's lifestyle or personal characteristics.

The well-documented needs of these homeless youth include: (1) emergency shelter and crisis intervention, (2) counseling, and (3) longer-term placement for those who are unlikely to return home, especially youth who are difficult to place in foster care.<sup>57</sup>

Programs that help reconcile youth with their parents are essential. However, research shows that often the families are so destructive and abusive that returning the children is unwise. Almost 50% of the runaways need other options, including alternative residential care, transitional services for those ready for emancipation, and basic survival services for those committed to street life.<sup>58</sup>

The team report on Runaways and Homeless Youth identified several areas of concern to homeless youth living either on their own or with a homeless family.<sup>59</sup>

**Emergency Shelter and Services.** There are not enough shelter beds for homeless youth in Los Angeles. The county Juvenile Court has 22 SODA beds (Status Offender Detention Alternatives Program) and local non-profit agencies have another 24 short-term (2 weeks) beds. These beds are generally used while the agencies try to reunite the minors with their families. Expanding the SODA bed program is not the answer, since most homeless youth tend to avoid programs which bring them into contact with the Juvenile Court.

**Solution:** Shelter and services should be developed which are aimed at the homeless youth for whom reunification with their family is not feasible. The Homeless Youth Project (a cooperative project of Children's Hospital, the Los Angeles Youth Network and the Coordinating Council for Homeless Youth Services) has recently been funded as a pilot project. This 20-bed overnight emergency shelter also has a comprehensive daytime case management center which is connected with a network of service providers. However, this one project is not an adequate solution to major, system-wide problems. The City of Los Angeles should develop and fund other programs modeled in whole or in part after the Homeless Youth Project.

**Eligibility for Relief and Social Services.** Many homeless youth cannot prove they are county residents and thus are not able to gain

access to services provided by local government agencies. Ineligibility for general relief assistance is a continuing problem for homeless youth. General relief is available for homeless adults, but not to minors unless they have been declared "emancipated" by a court. However, emancipation statutes require that the minors must be living away from home with parental consent and that the minors are living on income derived from a lawful source. These requirements make most homeless teens ineligible for emancipation. Many older homeless teens (16 or 17 year-olds) are not generally suitable for foster care placement; independent living is often the best option for them. However, without some general assistance, independent living is difficult, if not impossible, to achieve.

*Solution:* Enable homeless teens — especially those who can not be returned home or placed in foster care — to qualify for general relief. This could be done by changing local agency procedures and guidelines. In addition, the emancipation statutes should be changed to allow a court to declare 16 and 17 year-olds emancipated if they are enrolled in an independent living program operated by county or non-profit agencies.

**Access to Public School Programs.** Homeless youth, whether they are runaways, "push-outs," or living within a homeless family, find it difficult to attend public school. Those children who live in homeless families often are not enrolled in such because every few weeks they are moved from a shelter in one school district to a shelter in another district. As a result, the school lives of these youngsters are severely disrupted. Additionally, when homeless families seek to enroll children, or when runaways seek to enroll, two bureaucratic problems emerge. First, the law requires evidence of inoculation. Second, schools frequently ask for a birth certificate. Homeless children often do not have these documents. Amazingly, participation in some school programs, such as school lunch programs, requires evidence of a permanent address. Homeless youth receive further discouragement when they are required to provide items such as school supplies or bag lunches. One conclusion is inescapable: public school regulations do not recognize the special problems of homeless families and homeless youth.

*Solution:* Public schools should not require evidence of a permanent address in order to enroll children or offer a benefit such as a school lunch. The only requirement should be some evidence that the child is presently residing in the school district. In light of analogous court cases dealing with public assistance and voter registration, the permanent address requirement of the Los Angeles Unified School District may be unlawful and should be discontinued.<sup>60</sup>

**Transportation to and from Services.** Los Angeles is a large metropolitan area with an inefficient public transportation system. For homeless youth and homeless families, travelling from one service to another, which means travelling from one part of the city to the other, is burdensome and sometimes impossible. Many homeless youth or their families get discouraged and simply stop seeking services, including needed health care.

*Solution:* The city should develop a publicly-funded van service between social and medical support services utilized by homeless youth and homeless families. This will allow the needy to have greater access to essential medical and social services.

**Coordinated Services.** Local agencies dealing with homeless youth do not adequately coordinate their services; the system of care is

very fragmented, with inadequate communication among the agencies serving the same population. The lack of coordination is especially serious considering the scarce resources available.

*Solution:* The city should increase access to services by providing instruction to homeless families and homeless youth about all available services. The city should establish a centralized Homeless Information and Referral Service which could assist the homeless and educate the general community about both the severity of the problems and the existence of projects designed to alleviate them.

## Adequate and Affordable Housing

Overcrowded housing, substandard housing, and the lack of affordable housing are issues of major concern to the Task Force. High birth rates and an increase in extended-family living arrangements are contributing to a greater number of large families in the city, especially in many ethnic neighborhoods. As the middle-class shrinks and low-income households increase in numbers, the concept of affordability must be reexamined. As a practical reality, there are not enough housing units to meet the demand of large families, and of the existing housing stock, units are either inadequate in size, substandard, or simply not affordable.

**Overcrowding.** During the past two years, the Los Angeles City Council has grappled with the overcrowding issue. First, by an 8 to 5 vote, the Council tentatively voted to adopt an ordinance limiting the number of persons who could sleep in one room.<sup>61</sup> Dissenters claimed that the proposal discriminated against Latino families, Black families, and other large families in the city. Later, the Council voted 10 to 4 to rescind the measure.<sup>62</sup> Councilman Richard Alatorre temporarily convinced his colleagues that the restriction would break up families and give slumlords an extra weapon with which to threaten complaining tenants with eviction. However, after further study, the Council unanimously approved an ordinance limiting the number of people who can occupy an apartment or a rented house.<sup>63</sup> Under the new law, 70 square feet of sleeping space is required for two persons and another 50 square feet for each additional person. City officials calculated that this formula would allow up to 10 people to live in a moderate-sized two-bedroom apartment.<sup>64</sup> The Council sought to prevent abuses by landlords when it passed a companion measure requiring landlords to give written notices to tenants advising them of the maximum number of occupants legally allowable per unit, banning landlords from retaliating against tenants who complain of housing conditions, and requiring landlords evicting tenants for overcrowding to offer alternative housing of adequate size if it is available.<sup>65</sup> Despite the liberality of the new ordinances, many tenants — especially undocumented residents — feel they cannot comply.<sup>66</sup>

Dr. Allan Heskin, a professor at the UCLA School of Architecture and Planning, has attributed the overcrowding problem, in part, to the city's lack of a family housing policy. He has stressed that the city's preoccupation with building a large number of one-bedroom units has exacerbated the problem, causing a tremendous mismatch between the housing needs of families and the housing supply for families. In his testimony to the Task Force, Professor Heskin explained:<sup>67</sup>

[T]he bureaucracy in the city is very much into a numbers game. Like anybody who is in a social service agency, they want to report large numbers, as large a number as they can produce.

It . . . relates to dealing with smaller units which cost less to rehabilitate or cost less to build, so they are going to produce small units — they're not going to produce family units, large units. . . .

Also, the Redevelopment Agency, until very recently, had no interest in families — again, because you could produce more numbers with smaller units. Recently, there has been some awakening in the Redevelopment Agency, partly in the Hollywood Redevelopment program and partly due to Councilman Woo's efforts in asking, "How is family housing?" But it's something that ought to be asked in every part of the housing program. If only concerned Councilpeople, when they saw these reports and saw these numbers, would ask: "Well, how about family housing?" Instead of counting units, maybe they should ask: "How many three-bedrooms have you produced?" Maybe if you changed the accounting system you would get a better result.

In Hollywood, for example, there's a classic example of this problem. Hollywood . . . [is] massively overcrowded. It's almost entirely one-bedroom apartments, and it's almost entirely families. So we have this incredible mismatch of the housing stock and the family composition, and the city has historically been very much a part of this problem. You'll find one-bedroom after one-bedroom produced by the city. . . .

So you'll find throughout this area of the city, and throughout the whole city, huge complexes of one-bedroom units. We have basically exhausted that market. We're basically at the same situation we were in the condo boom. Remember how they built condos? Now we're into the one-bedroom rental situation the way we were into condos.

The Task Force on Family Diversity finds that there is a need for the city to adopt a family housing policy that goes beyond the mere imposition of occupancy limits. Further subsidy of zero-bedroom or one-bedroom unit construction should be halted until sufficient two, three, and four-bedroom units have been built to meet the housing needs of the city's families.

Related to the overcrowding issue is that of "undercrowding." According to Kelly Brydon, Coordinator of the Fair Housing Council of the San Fernando Valley, the imposition of overly-restrictive occupancy limits by landlords is also a major problem throughout the city.<sup>68</sup> In the absence of laws preventing the practice, many landlords have adopted a rule of "one person per bedroom." Speaking about this type of limitation, Ms. Brydon testified:<sup>69</sup>

They [landlords] are currently governed by whatever the owner's preference is. Whatever an apartment owner or houseowner chooses to set as a limit is acceptable. There is no guideline under state law or city law for L.A. . . . By undercrowding, I mean that some of these owners, rather than go ahead and live with the new child laws and the lack of being able to discriminate, they're setting occupancy limitation standards that not only aren't reasonable, in our opinion they would be clearly discriminatory. For example,

they set a one-person-per-bedroom occupancy standard. So let's take the classic example of a married couple with no children. That would mean that they would have to have two bedrooms. So as we can see, that is not very reasonable. A second example to clarify that is there's a landlord right now that's involved in a lawsuit. His occupancy limit is one person per bedroom. He had a three-bedroom apartment available and we had a family with two children and they did not qualify. Having an adequate income, and meeting all other criteria, they would have qualified for the apartment but because they had two kids instead of one he disqualified them from the unit. So that's definitely an area we need to look at.

The Task Force on Family Diversity finds the one-person-per-bedroom rule, which has been adopted by many local landlords, to be arbitrary and unreasonable. The City Attorney should advise the City Council as to whether this practice is illegal under existing law. If it is, landlords should be advised to stop using this rule. If they persist, violators should be prosecuted. If the rule is not illegal under existing law, then the law should be amended to make it illegal.

**Affordability.** Most families in Los Angeles cannot afford to buy a home. According to the California Association of Realtors, the affordability index in Los Angeles is about 26%; last year it was 29%.<sup>70</sup> The median price for homes in the Los Angeles area in 1987 was \$137,000; today it is \$156,000. In order to qualify for a purchase loan to buy an average dwelling, households in this region need a minimum annual income of \$45,000. With homes being priced out of their range, only 26% of Los Angeles households have sufficient income to qualify for an average home loan.

There are 313,943 households — 28% of all households in the City of Los Angeles — in need of housing assistance.<sup>71</sup> The city has only 22,000 federally assisted and public housing units available.<sup>72</sup> About 15,000 people are on the waiting list.<sup>73</sup>

The city Housing Authority has an annual budget of \$175 million. Yet, last year, the agency declared a "cash flow" problem and withheld more than \$1 million in rent subsidy payments to participating landlords. This caused a serious hardship on some landlords of smaller buildings who then threatened to remove their units from the low-income housing program.<sup>74</sup> The federal Department of Housing and Urban Development has declared the Housing Authority to be "operationally troubled."<sup>75</sup> With two-thirds of the city's low-income households in need of assistance, and with long waiting lists for public housing, the city cannot afford to have landlords pull out of the program. The severity of the problem and its practical impact on the lives of residents merit the swift and comprehensive attention of government so that needed subsidies are not interrupted now or in the future.

Two local housing experts predict that the city's housing crisis has only begun. They cite several conditions to support their opinions.<sup>76</sup>

**Earthquake-Safety Upgrades.** More than 30,000 low-cost units may be lost as private apartment owners upgrade their buildings to meet the city's earthquake-safety ordinance. As a result, low-income tenants will face either increased rents to cover the cost of improvements or demolition of their homes.

*Lifting of Subsidy Restrictions.* Another 30,000 units may become unaffordable to low-income families and seniors as federal rent restrictions on privately-owned, government subsidized housing expire.

*Conversion to Condos or High-Rent Units.* Spurred by low interest rates, demolition or conversion of local apartment units has more than doubled over the last three years. These affordable units are being replaced by high-cost rentals or condominiums.

*More Minimum-Wage Jobs.* In Los Angeles, high-paying industrial jobs are being replaced by low-paying work in the service sector. Consequently, an increasing number of families are now trying to survive on earnings at or near minimum wage. With the least expensive one-bedroom units in the city renting for \$400 per month, this means that a single parent, earning minimum wage, has to spend almost 70% of income on rent, leaving less than \$180 per month to feed, clothe, and provide essential family health care.

In addition to calling a halt to the overproduction of one-bedroom units, Professor Heskin suggested two other ways the city could address local housing problems. The first has to do with the definition of "affordability." The city uses the federal government's definition, which is based on the median of everyone's income in Los Angeles County, including people who live in such affluent areas as Beverly Hills, and including homeowners as well as renters.<sup>77</sup> This results in an unrealistically and artificially high number.

The Task Force on Family Diversity agrees with Professor Heskin's criticisms of present methods of computing "affordability." Affordability for renters should not be based on an equation that includes the incomes of homeowners — people who are not in the rental housing market. Rent of \$650 per month for a two-bedroom apartment is simply not affordable to low-income families.

Second, Professor Heskin suggests the development of non-profit organizations in the housing business. With few exceptions, like the S.R.O. Development Corporation, the City of Los Angeles has not supported non-profits in the housing field, and this failure may be short sighted.

The director of the Community Redevelopment Agency recently acknowledged this problem. From a profit-making standpoint, she said most developers are interested in building larger complexes with 75 units or more. However, "housing a lot of [families with] children works out better in smaller doses."<sup>78</sup>

The director of the National Housing and Rehabilitation Association — primarily representing private developers — agrees that nonprofit groups can play an important role in spurring the production of low-income housing.<sup>79</sup>

One national non-profit organization is taking aim at the Los Angeles housing market with the objective of generating more low-income housing by merging corporate dollars and government housing funds.<sup>80</sup> The Task Force on Family Diversity commends the Chicago-based National Equity Fund for its interest in helping Los Angeles and encourages similar interest by local corporate leaders.

The Task Force on Family Diversity notes that as yet the corporate sector in Los Angeles has not produced a housing advocate. Two local

researchers have pointed out that New York has David Rockefeller, Chicago has Lawrence Fuller, Baltimore has James Rouse, and the San Francisco business community has formed the Bay Area Council which has raised several million dollars for nonprofit housing.<sup>81</sup> Perhaps such a corporate advocate is a missing ingredient in the solution of the Los Angeles' housing crisis.

Much of this section of the Task Force report is consistent with findings made by the Los Angeles County Commission on Human Relations.<sup>82</sup>

The Task Force on Family Diversity is also concerned about the displacement which accompanies gentrification — a process whereby urban professionals move into lower-income areas, renovating and improving the housing stock. The displaced tend to be the poor, the elderly, female-headed households, those with limited education, the unemployed, and the disabled, with a high percentage of ethnic minorities in each of these categories.<sup>83</sup> City departments with housing responsibilities should develop concrete plans to deal effectively with gentrification, including the displacement caused thereby.

### Discrimination in Housing

Housing discrimination exists, persists, and in some areas has increased in the City of Los Angeles. For example, in the San Fernando Valley, between 1985 and 1986, fair housing officials reported an increase in housing discrimination on the basis of race (up 34%), national origin (up 60%), and marital status (up 25%). Discrimination against families with children was also up 40%.<sup>84</sup> The number of clients served by four fair housing councils in the city rose from 4,192 in 1983 to 5,808 in 1985.<sup>85</sup>

In her testimony before the Task Force, the coordinator of the Fair Housing Council of San Fernando Valley confirmed that housing discrimination against racial and ethnic minorities, unmarried couples, people with disabilities, and families with children is not unusual.<sup>86</sup> The County Human Relations Commission has found such discrimination persistent in some locations:<sup>87</sup>

Equal access to housing continues to be denied to many individuals for a variety of reasons, with discrimination having a pronounced and disparate effect on certain groups: Blacks, female-headed households, immigrants and refugees, the disabled, the economically disadvantaged, and families with children.

The Task Force on Family Diversity finds that housing discrimination against families exists in the City of Los Angeles. Unfair housing practices are common throughout the city. The City Attorney and the the city's new housing coordinator should work with the Fair Housing Councils in the city to develop a plan to deter landlords from engaging in unfair housing practices and to educate families of their housing rights. Educational outreach should specifically extend to single-parent families, large families, immigrant families, unmarried couples, and families of color.

According to Richard Smith, past-President of the Mayor's Advisory Council on Disability, some builders avoid compliance with accessibility laws when they build condominiums.<sup>88</sup> Since condominium complexes are treated the same as single family dwellings —

builders do not have to make them accessible to physically-challenged individuals.

Mr. Smith also noted that an apartment (not condominiums) complex that recently opened in San Fernando Valley with 1,296 apartment units, financed 80% by the Community Redevelopment Agency, is not accessible to people with disabilities; the builder avoided the accessibility laws by securing a "high density" variance from the city. Such variances are usually used for condominiums and do not have accessibility requirements attached to them. When building large apartment complexes, builders now often seek and receive these permits, thereby rendering accessibility laws ineffective.

The Task Force suggests that the City Department of Building and Safety stop issuing high density variances to builders of apartment buildings without attaching accessibility requirements. If necessary, the City Attorney should examine the problem and take appropriate steps to stop the misuse of high density variances to avoid accessibility requirements.

## **HOUSING AND HOMELESSNESS: RECOMMENDATIONS**

### **Homeless Adults and Families**

15. To prevent displacement of individuals and families, the Task Force recommends that the city require full replacement of low-income housing units scheduled to be removed from the total housing stock before demolition of the units, rather than mere partial replacement after demolition, as is now often the case.

16. To protect the homeless from crime, and to protect businesses and residents from criminals posing as homeless persons, the Task Force recommends that the Los Angeles Police Department develop a greater and highly visible police presence in areas that attract large homeless populations, especially downtown Los Angeles and the Venice area.

17. To decrease discord and waste of resources caused by inter-governmental lawsuits, and to increase cooperation on the homelessness issue, the Task Force recommends that a City-County Task Force on the Homeless be created. A 25-member Task Force could include 15 members appointed by the County Board of Supervisors (3 members per Supervisor), 5 appointed by the Mayor and 5 by the President of the City Council. Members of the Task Force should include corporate and religious leaders, developers, builders, and city planners, social service providers, and advocates for the homeless. The City-County Task Force should monitor the implementation of A.B. 1733, develop plans for a Housing Clearinghouse that would assist in matching homeless families with affordable housing, and recommend ways in which the city and the county can effectively deal with the problems of the homeless, including support of private shelters for homeless individuals and families.

### **Homeless Youth**

18. The Task Force recommends that the Mayor and the City Council support the development of other programs based on the model of the Homeless Youth Project of Children's Hospital.

19. Because various agencies have overlapping responsibilities in dealing with runaways and other homeless youth in the City of Los

Angeles, the Task Force recommends that an Inter-Agency Task Force on Homeless Youth be created. Membership on the Task Force should include representatives from public agencies, such as the Los Angeles Police Department, Los Angeles County Sheriff's Department, Los Angeles Juvenile Court, Department of Public Social Services, Los Angeles Unified School District, City Attorney, District Attorney, and private agencies, such as the Los Angeles Youth Network, the Gay and Lesbian Community Services Center, and the Coordinating Council for Homeless Youth. The Inter-Agency Task Force should develop ways to implement recommendations adopted by the Family Diversity Task Force Team on Runaways and Homeless Youth, especially those dealing with emergency shelter and services, eligibility for relief and social services, access to school programs, and coordinated services.

20. The Task Force recommends that the Mayor and the City Council develop a publicly-funded van service between social and medical support services utilized by homeless youth and families.

### **Adequate and Affordable Housing**

21. The Task Force recommends that the city's Housing Coordinator create a Task Force on Adequate and Affordable Housing. The first job of the Task Force should be to begin development of a policy for the city on affordable family housing. In addition, the Task Force should: (a) recommend ways to stimulate the production of more three and four-bedroom units in the city, (b) review the city's ability to discourage rental policies that charge additional fees for additional persons once a basic rent has been established for a unit, and (c) identify areas of gentrification and develop plans to maintain housing for low-income and large families presently living in those areas.

22. The Task Force recommends that the City Council and the Mayor support the establishment of local non-profit housing organizations.

### **Housing Discrimination**

23. The Task Force recommends that Councilman Michael Woo ask the City Attorney for an opinion regarding the legality of the one-person-per-bedroom rule imposed by many landlords. If the rule is illegal, the City Attorney should advise local apartment-owner associations of this. If the practice is not illegal under existing law, the Council should amend the law.

24. The Task Force recommends that the City Attorney enforce existing fair housing laws against shelters for the homeless that won't accept pregnant women. If rejection of pregnant women is not presently illegal, the law should be amended.

25. Since housing discrimination persists, the Task Force recommends that the City Attorney and the city's Housing Coordinator cooperate with the Fair Housing Councils to develop a plan to deter landlords from engaging in unfair housing practices and to educate families of their housing rights.

26. The Task Force recommends that the Department of Building and Safety stop issuing high density variances to builders of apartment buildings without including accessibility requirements. If necessary, the City Attorney should take appropriate steps to stop the misuse of high density variances to avoid accessibility laws.



## Notes: Housing

- <sup>1</sup> *Hansen v. McMahon* (1987) 193 A.C.A. 3d 283, 87 Daily Journal D.A.R. 4063, 4066.
- <sup>2</sup> Health and Safety Code Section 50002; see also former Health and Safety Code Sections 37120 et seq., 42000, 41003, 41002, and 44104.
- <sup>3</sup> Stats. 1984, ch. 1691.
- <sup>4</sup> May, Lee, "L.A. Leads in Rise in Ranks of Homeless, Survey Finds," *Los Angeles Times*, December 18, 1986.
- <sup>5</sup> *Ibid.*
- <sup>6</sup> *Ibid.*; "Los Angeles in Lead as Needs of the Homeless Increase," *Los Angeles Daily Journal*, December 19, 1986.
- <sup>7</sup> Homeless Policy for the City of Los Angeles, submitted by the Chief Legislative Analyst to the City Council on June 9, 1987.
- <sup>8</sup> McMillan, Penelope, "L.A. Homeless on Skid Row to Face Arrest," *Los Angeles Times*, May 29, 1987.
- <sup>9</sup> McMillan, Penelope, "Council Calls for Limits on Plan to Jail the Homeless," *Los Angeles Times*, June 3, 1987; Sackett, Kacy, "L.A. City Files Suit Against County Over Homeless Aid," *Los Angeles Daily Journal*, July 23, 1987.
- <sup>10</sup> Chandler, John, "Venice Meeting Long on Argument, Short on Solutions," *Los Angeles Herald Examiner*, September 18, 1987.
- <sup>11</sup> McMillan, *supra*, note 8.
- <sup>12</sup> McMillan, Penelope, "Bradley Proposes Temporary Camp for L.A.'s Homeless," *Los Angeles Times*, June 4, 1987.
- <sup>13</sup> McMillan, Penelope, "Foundation Laid at 'Campground' for the Homeless," *Los Angeles Times*, June 28, 1987.
- <sup>14</sup> See note 4, *supra*.
- <sup>15</sup> See note 13, *supra*.
- <sup>16</sup> Merina, Victor, "Urban Camp for Homeless Due to Close," *Los Angeles Times*, September 17, 1987.
- <sup>17</sup> McChesney, Kay Young, Ph.D., "Characteristics of the Residents of Two Inner-City Emergency Shelters for the Homeless," June 23, 1987.
- <sup>18</sup> *Ibid.*
- <sup>19</sup> *Ibid.*
- <sup>20</sup> *Ibid.*; about half the homeless studied experienced serious hunger problems, and more than half had been victims of violence or robbery.
- <sup>21</sup> *Id.*, pp. 64-72.
- <sup>22</sup> Harris and McMillan, "Services and Shelter for the Homeless OK'd by L.A.," *Los Angeles Times*, June 10, 1987.
- <sup>23</sup> Boyarsky, Bill, "Bradley Calls for Halt to Razing of Skid Row Hotels," *Los Angeles Times*, July 22, 1987.
- <sup>24</sup> Conklin, Ellis, "'Bradleyville' Transients Get Reprieve," *Los Angeles Herald Examiner*, September 18, 1987.
- <sup>25</sup> Merina, Victor, "Bradley Appoints Coordinator to Help Develop Low-Cost Housing," *Los Angeles Times*, September 18, 1987. The new position apparently was in response to a recommendation by a city task force that a deputy mayor for housing be named so that the Mayor's Office could become the focal point to coordinate efforts to develop and implement a comprehensive city housing policy. See: Merina, Victor, "Panel Urges Saving Skid Row Hotels for Residents, Relocating Homeless," *Los Angeles Times*, July 25, 1987.
- <sup>26</sup> See note 9, *supra*.
- <sup>27</sup> See note 16, *supra*.
- <sup>28</sup> *Ibid.*
- <sup>29</sup> *Ibid.*
- <sup>30</sup> "Senate Votes \$923 Million for Homeless," *Los Angeles Times*, June 28, 1987; "Funds for Homeless Win Lopsided Approval in House," *Los Angeles Times*, July 1, 1987.
- <sup>31</sup> "Fund for Homeless Families Would Aid County Residents," *Mt.*

*Washington Star Review*, September 5, 1987.

- <sup>32</sup> "Advocates for Homeless Will Stop Protest at Capitol," *Los Angeles Times*, January 11, 1987.
- <sup>33</sup> Kaplan, Sam, "City Groping for Skid Row Policy," *Los Angeles Times*, July 19, 1987.
- <sup>34</sup> Kinchen, David, "Study Calls for Changes To Shelter the Homeless," *Los Angeles Times*, September 6, 1987; Getlin, Josh, "Innovative, Experimental Programs Aid Homeless," *Los Angeles Times*, June 21, 1987; Spiegel, Claire, "Innovative Fund Takes Aim at Homeless," *Los Angeles Times*, July 16, 1987.
- <sup>35</sup> Testimony of David Wood, M.D., "Homeless Families: A Growing Crisis," *Public Hearing Transcript*, p. 208.
- <sup>36</sup> *Ibid.*, at p. 209.
- <sup>37</sup> *Ibid.*, at pp. 209-210.
- <sup>38</sup> Jones, Lanie, "Youngsters Share Plight of Homeless," *Los Angeles Times*, May 19, 1987.
- <sup>39</sup> Testimony of Nancy Berlin, "Special Needs of Homeless Families," *Public Hearing Transcript*, p. 129.
- <sup>40</sup> *Ibid.*
- <sup>41</sup> *Id.*, p. 130.
- <sup>42</sup> Testimony of Byron Gross, Esq., "Homeless Families: The *Hansen* Case," *Public Hearing Transcript*, p. 33.
- <sup>43</sup> See note 1, *supra*.
- <sup>44</sup> *Ibid.*
- <sup>45</sup> Testimony of David Wood, *supra*, note 34, at p. 211.
- <sup>46</sup> *Ibid.*
- <sup>47</sup> Testimony of Nancy Berlin, *supra*, note 38, at p. 131.
- <sup>48</sup> A.B. 1733 was filed with the Secretary of State as Stats. 1987, ch. 1353.
- <sup>49</sup> Berlin, *supra*.
- <sup>50</sup> Testimony of Gary Yates, "Runaways and Homeless Youth," *Public Hearing Transcript*, p. 55.
- <sup>51</sup> Prince, Richard, "Runaways and Homeless Youth in Los Angeles County," *Report of the Task Force on Family Diversity: Supplement — Part Two*, p. S-645; Mendez and Werber, "Runaways: A Social Problem," *Supplement — Part Two*, p. S-889.
- <sup>52</sup> Costello and Mata, "Runaways and Homeless Youth," *Report of the Task Force on Family Diversity: Supplement — Part One*, p. S-476.
- <sup>53</sup> Testimony of Gary Yates, "Runaways and Homeless Teenagers," *Public Hearing Transcript*, p. 55.
- <sup>54</sup> Costello and Mata, *supra*, note 52, p. S-489.
- <sup>55</sup> Yates, *supra*, note 53, p. 56.
- <sup>56</sup> Porche-Burke and Wood, "Team Report on Family Violence," *Report of the Task Force on Family Diversity: Supplement — Part One*, p. S-243.
- <sup>57</sup> Costello and Mata, *supra*, note 52, p. S-490.
- <sup>58</sup> Rothman and Thomas, Bush Program, UCLA School of Social Welfare, *Focus on Runaway and Homeless Youth: Status Offenders in Los Angeles County, A Study and Policy Recommendations* (1985).
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- <sup>60</sup> *Nelson v. Board of Supervisors* (1987) 190 Cal.App.3d 25; *Collier v. Menzel* (1985) 176 Cal.App.3d 24.
- <sup>61</sup> Bottroff, Sarah, "Plan to Limit Bedroom Crowding Approved," *Los Angeles Daily Journal*, April 23, 1986.
- <sup>62</sup> Bottroff, Sarah, "Council Takes Second Look at Bedroom Overcrowding," *Los Angeles Daily Journal*, November 4, 1986.
- <sup>63</sup> Merina, Victor, "Council OKs Occupancy Limits on Rental Units," *Los Angeles Times*, December 13, 1986.
- <sup>64</sup> *Ibid.*
- <sup>65</sup> *Ibid.*
- <sup>66</sup> Ramos, George, "Crowded Families See No Way Out of Plight," *Los Angeles Times*, December 13, 1987.

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- <sup>68</sup> Testimony of Kelly Brydon, "Housing Problems of Families," *Public Hearing Transcript*, p. 89.
- <sup>69</sup> *Ibid.*
- <sup>70</sup> "California's Housing Affordability Fell in April," *Los Angeles Times*, June 4, 1987; "The Numbers," *Los Angeles Times*, April 25, 1988.
- <sup>71</sup> Kinchen, David, "Study Calls for Changes to Shelter Homeless," *Los Angeles Times*, September 6, 1987.
- <sup>72</sup> *Ibid.*
- <sup>73</sup> Speigel, Claire, "City Agency Delays Paying \$1 Million — To Stay in Black, Housing Authority Withholds Rent Subsidies," *Los Angeles Times*, May 29, 1987.
- <sup>74</sup> *Ibid.*
- <sup>75</sup> *Ibid.*
- <sup>76</sup> Richman, Neal, and Schwartz, Ruth, "Housing Homeless Families: Why L.A. Lags Behind," *Los Angeles Times*, May 24, 1987.
- <sup>77</sup> Testimony of Professor Allan Heskin, *supra*, at pp. 320-322.
- <sup>78</sup> Speigel, Claire, "Innovative Fund Takes Aim at Homeless," *Los Angeles Times*, July 16, 1987.
- <sup>79</sup> *Ibid.*
- <sup>80</sup> *Ibid.*
- <sup>81</sup> See note 76, *supra*.
- <sup>82</sup> "Division in the Midst of Diversity: Continuing Discrimination in Housing" (April 1986).
- <sup>83</sup> Hanna-Witherspoon, Betty, "Report of the Research Team on Housing Issues," *Report of the Task Force on Family Diversity: Supplement — Part One*, p. S-426.
- <sup>84</sup> *Ibid.*
- <sup>85</sup> *Ibid.*
- <sup>86</sup> Testimony of Kelly Brydon, *supra*, at pp. 90-92.
- <sup>87</sup> Hanna-Witherspoon, *supra*, note 83, at p. S-425.
- <sup>88</sup> Testimony of Richard Smith, "The City's Response to Disability Issues," *Transcript of Public Hearings*, p. 241.