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16 COUNTY OF LOS ANGELES

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
19

20 LA ALLIANCE FOR HUMAN
21 RIGHTS, et al.,
22 Plaintiffs,
23 v.
24 CITY OF LOS ANGELES, et al.,
25 Defendants.
26

CASE NO. 2:20-cv-02291 DOC (KES)
DEFENDANT COUNTY OF LOS ANGELES' RESPONSE TO COURT'S REQUEST FOR BREAKDOWN OF MENTAL HEALTH BEDS [DKT. 705]

Assigned to the Hon. David O. Carter and Magistrate Judge Karen E. Scott

1 On April 1, 2024, the Court requested that the County of Los Angeles (the
2 “County”) “provide a breakdown” of the new mental health/substance use disorder
3 (“SUD”) beds reported in Exhibit C of the County’s Supplemental Status Report¹
4 (Dkt. 689) (“Report”) “that identifies their location by Los Angeles City Council
5 district and councilmember, or city within the county.” (Dkt. 705.)

6 In response to the Court’s Request, appended hereto as Exhibit 1 is the chart
7 from Exhibit C of the Report with an additional column identifying the city in which
8 each reported facility is located. For those facilities under the jurisdiction of the
9 City of Los Angeles (“City”), Exhibit 1 identifies the Council District and elected
10 Councilmember. Nearly half (458) of the 921 new mental health/SUD beds are in
11 the City.

12 Eligibility criteria and clinical decisions dictate placement in these beds, not
13 geography, city, or City District residency. This means that residents are not limited
14 to accessing beds in their city or District, which may not match their need. Such
15 geographic restriction would significantly undermine efficiency in the homeless
16 services system, and would do a disservice to clients and the broader community.
17 For example, the County’s supply of mental health beds include acute psychiatric
18 beds that are, by design, intended for short-term stays. Once a client is stabilized,
19 they are moved to a different bed class so that another eligible individual can be
20 placed. As indicated in the Report, the County is diligently expanding the pool of
21 available mental health/SUD beds across the continuum of care in order to create
22 flow across all levels of need. In addition, these beds and the County services
23 attached thereto are reported to and audited by the State of California, and it would
24 violate the governing regulations to restrict these licensed beds to particular
25 populations.

26
27 ¹ The County’s First Status Report pursuant to the settlement agreement (Dkt. 662)
28 contained an identical chart of new mental health and SUD beds.

1 Pursuant to Section D(9) of the County’s Settlement Agreement, the County
2 files quarterly reports on, *inter alia*, “[t]he number of [Mental Health/SUD] beds
3 that have been developed (or status thereon) under this agreement, what said beds
4 are being used for, and the basis for determining greatest need.” The Report
5 therefore identified in Exhibit C only shows mental health and SUD beds that the
6 County had brought online between July 1, 2022 and December 31, 2023, and does
7 not include all the mental health/SUD beds in the County as of December 31, 2023.
8 Nor does the Report or the Exhibits hereto encompass the entire spectrum of beds
9 within a particular City or Council District.

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DATED: April 3, 2024

MILLER BARONDESS, LLP



By:

MIRA HASHMALL
Attorneys for Defendant
COUNTY OF LOS ANGELES

EXHIBIT 1

Mental Health/Substance Use Disorder Beds

PROGRAM/FACILITY/PROJECT NAME	AVAILABLE BEDS	DATE AVAILABLE	CITY OR COUNCIL DISTRICT ("CD")
SIERRA VISTA	4	7/1/2022	HIGHLAND
CALIFORNIA PSYCHIATRIC TRANSITIONS	10	7/1/2022	MERCED
STONEY POINT MEDICAL SNF	35	7/1/2022	CD 12 - Lee
TELECARE RANCHO CITRUS HOUSE	16	10/3/2022	DOWNEY
LAS ENCINAS	10	12/1/2022	PASADENA
LACADA SAFE HAVEN	16	12/1/2022	SANTA FE SPRINGS
FLORENCE HOUSE	16	12/1/2022	LOS ANGELES
TELECARE LA GENERAL MAGNOLIA HOUSE	16	12/12/2022	CD 14 - de León
TELECARE OLIVE HOUSE	16	12/12/2022	CD 7 - Rodriguez
CENTRAL STAR RANCHO LOS AMIGOS	16	2/6/2023	DOWNEY
VALLEY STAR MLK BHC CRT	16	3/22/2023	LOS ANGELES
CENTRAL STAR OLIVE VIEW UCLA	16	5/17/2023	CD 7 - Rodriguez
VALLEY STAR RANCHO LOS AMIGOS	16	6/14/2023	DOWNEY
LAS ENCINAS	15	7/1/2023	PASADENA
MISSION COMMUNITY HOSPITAL	20	7/1/2023	CD 6 - Padilla
PACIFICA HOSPITAL OF THE VALLEY	10	7/1/2023	CD 6 - Padilla
GENERATIONS	10	7/1/2023	ATWATER FRESNO
JOURNEY TO NEW HORIZONS	40	7/8/2023	CD 8 - Harris-Dawson
PACIFICA HOSPITAL OF THE VALLEY URGENT CARE CLINIC	8	8/1/2023	CD 7 - Rodriguez
COAST PLAZA HOSPITAL	37	8/7/2023	NORWALK
THE MARK TWAIN	56	9/1/2023	CD 13 - Soto-Martínez
PINE LODGE	15	9/18/2023	CD 10 - Hutt
DEL AMO HOSPITAL	18	10/11/2023	TORRANCE
CENTRAL STAR LA GENERAL	16	10/30/2023	CD 14 - de León
NEW: HOLLYWOOD WALK OF FAME HOTEL	20	11/20/2023	CD 13 - Soto-Martínez
CASA DE LAS AMIGAS	5	7/1/2022	PASADENA
BEACON HOUSE ASSOCIATION OF SAN PEDRO (THE)	15	7/13/2022	CD 15 - McOsker
BEACON HOUSE ASSOCIATION OF SAN PEDRO (THE)	12	7/13/2022	CD 15 - McOsker
BEACON HOUSE ASSOCIATION OF SAN PEDRO (THE)	14	7/13/2022	CD 15 - McOsker
BEIT T'SHUVAH	10	7/13/2022	CD 10 - Hutt
CRI-HELP, INC.	14	7/13/2022	CD 2 - Krekorian
DIVINE HEALTHCARE SERVICES, INC.	5	7/13/2022	SIGNAL HILLS
DIVINE HEALTHCARE SERVICES, INC.	4	7/13/2022	SIGNAL HILLS
EXODUS RECOVERY INC.	8	7/13/2022	CD 7 - Rodriguez
FRED BROWN'S RECOVERY SERVICES, INC.	6	7/13/2022	CD 15 - McOsker
GRANDVIEW FOUNDATION, INC.	4	7/13/2022	PASADENA
GRANDVIEW FOUNDATION, INC.	6	7/13/2022	PASADENA
HEALTHRIGHT 360	24	7/13/2022	POMONA
HOUSE OF HOPE FOUNDATION, INC.	2	7/13/2022	CD 15 - McOsker
HOUSE OF HOPE FOUNDATION, INC.	6	7/13/2022	CD 15 - McOsker
HOUSE OF HOPE FOUNDATION, INC.	4	7/13/2022	CD 15 - McOsker
LOS ANGELES CENTERS FOR ALCOHOL AND DRUG ABUSE	20	7/13/2022	WHITTIER
LOS ANGELES CENTERS FOR ALCOHOL AND DRUG ABUSE	20	7/13/2022	WHITTIER
SAFE REFUGE (ORIGINAL NAME: SUBSTANCE ABUSE FOUNDATION OF LONG BEACH, INC.)	10	7/13/2022	LONG BEACH
SAFE REFUGE (ORIGINAL NAME: SUBSTANCE ABUSE FOUNDATION OF LONG BEACH, INC.)	6	7/13/2022	LONG BEACH
SAFE REFUGE (ORIGINAL NAME: SUBSTANCE ABUSE FOUNDATION OF LONG BEACH, INC.)	2	7/13/2022	LONG BEACH
SAFE REFUGE (ORIGINAL NAME: SUBSTANCE ABUSE FOUNDATION OF LONG BEACH, INC.)	2	7/13/2022	LONG BEACH
SOCIAL MODEL RECOVERY SYSTEMS, INC.	1	7/13/2022	COVINA
SOCIAL MODEL RECOVERY SYSTEMS, INC.	1	7/13/2022	CD 14 - de León
SOCIAL MODEL RECOVERY SYSTEMS, INC.	1	7/13/2022	EL MONTE
TARZANA TREATMENT CENTERS, INC.	6	7/13/2022	CD 12 - Lee
TARZANA TREATMENT CENTERS, INC.	1	7/13/2022	LANCASTER
TARZANA TREATMENT CENTERS, INC.	1	7/13/2022	CD 4 - Raman
TARZANA TREATMENT CENTERS, INC.	1	7/13/2022	CD 3 - Blumenfield
TARZANA TREATMENT CENTERS, INC.	6	7/13/2022	CD 3 - Blumenfield

PROGRAM/FACILITY/PROJECT NAME	AVAILABLE BEDS	DATE AVAILABLE	CITY OR COUNCIL DISTRICT ("CD")
TARZANA TREATMENT CENTERS, INC.	2	7/13/2022	CD 12 - LEE
TARZANA TREATMENT CENTERS, INC.	1	7/13/2022	PALMDALE
TARZANA TREATMENT CENTERS, INC.	1	7/13/2022	LANCASTER
TARZANA TREATMENT CENTERS, INC.	1	7/13/2022	LANCASTER
TARZANA TREATMENT CENTERS, INC.	1	7/13/2022	LANCASTER
TARZANA TREATMENT CENTERS, INC.	1	7/13/2022	CD 4 - Raman
TARZANA TREATMENT CENTERS, INC.	1	7/13/2022	CD 3 - Blumenfield
FRED BROWN'S RECOVERY SERVICES, INC.	1	7/14/2022	CD 15 - McOsker
FRED BROWN'S RECOVERY SERVICES, INC.	9	7/15/2022	LOS ANGELES
FRED BROWN'S RECOVERY SERVICES, INC.	1	7/16/2022	TORRANCE
FRED BROWN'S RECOVERY SERVICES, INC.	5	7/17/2022	CD 15 - McOsker
FRED BROWN'S RECOVERY SERVICES, INC.	1	7/18/2022	CD 15 - McOsker
FRED BROWN'S RECOVERY SERVICES, INC.	1	7/19/2022	CD 15 - McOsker
LAKE HUGHES RECOVERY	100	8/17/2022	LEBEC
SOUTHERN CALIFORNIA ALCOHOL AND DRUG PROGRAMS, INC.	6	11/15/2022	DOWNEY
SADLER HEALTHCARE, INC.	5	12/1/2022	CD 10 - Hutt
SADLER HEALTHCARE, INC.	15	12/1/2022	CD 1 - Hernandez
FRED BROWN'S RECOVERY SERVICES, INC.	1	4/11/2023	CD 15 - McOsker
FRED BROWN'S RECOVERY SERVICES, INC.	1	4/11/2023	CD 15 - McOsker
JWCH INSTITUTE, INC.	10	7/1/2023	CD 7 - Rodriguez
JWCH INSTITUTE, INC.	12	7/1/2023	CD 9 - Price
LOS ANGELES CENTERS FOR ALCOHOL AND DRUG ABUSE	2	7/1/2023	PASADENA
LOS ANGELES CENTERS FOR ALCOHOL AND DRUG ABUSE	6	7/1/2023	LOS ANGELES
CLARE FOUNDATION, INC.	5	7/25/2023	SANTA MONICA
FRED BROWN'S RECOVERY SERVICES, INC.	6	11/29/2023	CD 15 - McOsker
VOLUNTEERS OF AMERICA OF LOS ANGELES	12	11/29/2023	CD 9 - Price
DIVINE HEALTHCARE SERVICES, INC.	12	11/29/2023	LONG BEACH
FRED BROWN'S RECOVERY SERVICES, INC.	10	11/29/2023	CD 15 - McOsker
TARZANA TREATMENT CENTERS, INC.	7	11/29/2023	LANCASTER
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