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March 1, 2017

The Honorable Tony Mendoza  
California State Senate  
State Capitol, Room 5100  
Sacramento, CA 95814

**RE: SB 786 (Mendoza) Alcoholism or drug abuse recovery or treatment facilities: overconcentration. –SUPPORT**

Dear Senator Mendoza,

The Association of California Cities – Orange County (ACC-OC) would like to express its support for Senate Bill 786 (Mendoza). This bill would require the Department of Health Care Services (DHCS) to deny any alcohol or other drug residence facility licensing application if the proposed location is in proximity to an existing facility in an area zoned residential that would result in over concentration. The ACC-OC believes in the importance of increasing the oversight of local treatment facilities, which will ultimately result in better quality care for the residents seeking treatment. SB 786 is an important measure in helping bring to better regulate non-compliant treatment facility operations and practices.

SB 786 would create a framework that would strengthen the DHCS's review over licensed alcoholism or drug abuse recovery or facilities. Existing law states that an alcoholism or drug abuse recovery or treatment facility is any facility that provides 24-hour residential nonmedical services to adults who are recovering from problems related to alcohol and/or drug use. Recovery houses or other group living facilities that provide no care or supervision are exempt from the licensing requirements under the Community Care Facilities Act (CCFA). There are currently no protections to ensure patients receive a true residential experience when seeking treatment in a residential setting, addressing the proliferation of multiple facilities within close proximity to one another. Because DHCS is the sole authority overseeing licensed residential treatment facilities, this bill provides that protection, and allows the department to ensure that the primary function of residential treatment is being secured.

This bill will focus on creating guidelines for licensed residential treatment facilities in four specific areas, including; facility overconcentration, statewide facility capacity, access and barrier mitigation, and outcome measures. Overconcentration has been a concern for cities, particularly in the Orange County region, because 15% of licensed treatment facilities are located in the County of Orange – which, when compared to the rest of the State, is a greatly disproportionate number. An individual seeking treatment or recovery in a licensed residential treatment facility is doing so to experience a typical residential environment or reintegrate in a residential setting. Overconcentration of facilities, in a residential neighborhood, can lead to an institutional atmosphere – none of which would support the



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patient or the community. As mentioned, an oversaturation of facilities in one area, like Orange County, is not proportional and doesn't provide access to those seeking treatment in all parts of the State. This is important in addressing both the barrier and accessibility components, and the statewide capacity component. We hope that this bill provides a fair and equitable way to best serve those seeking treatments in all of California's regions.

The ACC-OC is a non-profit organization that proudly represents the interests of the 34 Orange County cities and the County of Orange. ACC-OC serves as a resource for elected officials and municipalities, focusing on three key initiatives: education that empowers, policy that is collaborative, and advocacy that is service-oriented. This bill helps fulfill this mission, by providing our cities and those seeking treatment the resources needed to help their communities. For this and the reasons state above, the Association of California Cities – Orange County is proud to support SB 34, as amended.

Should you have any questions about our position or about ACC-OC, please contact Diana Coronado, ACC-OC's Legislative Affairs Director, at (714) 953-1300 or at [dcoronado@accoc.org](mailto:dcoronado@accoc.org). We hope to be a resource to you, and we look forward to working with you and your office on this legislation.

Sincerely,

Heather Stratman  
Chief Executive Officer  
Association of California Cities – Orange County