

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

**COMPLAINT OF THE CITY
AND COUNTY OF SAN FRANCISCO**

)
)
)

Docket No. C2011-_____

1. Pursuant to 39 U.S.C. § 3662, the City and County of San Francisco (“San Francisco”) respectfully submits this complaint against the United States Postal Service (“Postal Service”).

OVERVIEW

2. This is a complaint regarding deficiencies in mail delivery service in violation of Postal Service regulations to San Francisco residents living in certain single-room occupancy buildings (“SROs”). Those deficiencies have exposed the residents of these SROs—some of the City's most vulnerable residents—to significant harms and risks due to lost or stolen mail, which Postal Service regulations are supposed to address.

3. SROs are residential or mixed use buildings in which tenants rent single rooms, typically around 8’ x 10’ in size. SROs comprise the largest sector of low-income housing in San Francisco. Many tenants are on fixed incomes and rely on governmental assistance. SRO tenants sign leases like tenants in San Francisco apartment buildings typically sign. SRO rooms typically differ from studios in higher income apartment buildings only in that they usually do not have a private bathroom or kitchen; instead, tenants typically share these amenities with other SRO residents.

4. Many tenants in SROs live in them for years. The average length of tenancy at certain San Francisco SROs is in excess of three years and the majority of SRO owners who

responded to a recent survey reported that the average tenancy at the building or buildings they own is in excess of one year. (See William Leiter and Michael Shen, *A Study of Private SRO Owners* 2, 8 (2009), available at <http://www.sfdph.org/dph/files/commTaskForcesDocs/SROdocs/HSAColSRORpts.pdf>.)

5. Since 2006, San Francisco has required that SROs install and maintain individual, locked mailboxes that comply with Postal Service regulations for the use of their residents. Since 2008, California Health & Safety Code Section 17958.3 has required that SROs install and maintain individual, locked mailboxes that comply with Postal Service regulations for the use of their residents.

6. The Postal Service has nonetheless refused to deliver mail to individual, locked mailboxes in most of San Francisco's SROs. Instead, the Postal Service's stated policy is to deliver mail only to a single-point at SROs in San Francisco.

7. The Postal Service's stated policy is set forth in a letter from San Francisco Postmaster Noemi Luna, dated December 18, 2008 (the "Luna Letter"). A true and correct copy of the letter is attached hereto as Exhibit 1. The letter states, in pertinent part: "Postal Service regulations provide for single point mail delivery to SROs. Under single point delivery service, the Postal Service delivers mail for residents to the address in bulk to building management, which is responsible for distributing the mail to residents and re-directing mail to former residents."

8. The Postal Service's refusal to provide mail delivery to individual, locked mailboxes at SROs that otherwise meet the requirements of Postal Operations Manual § 631.45 is a violation of Postal Operations Manual § 631.45, adopted pursuant to 39 U.S.C. § 401(2) and 39 C.F.R. § 211.2(a)(2), and the protections afforded by 39 U.S.C. § 403(c).

9. Postal Operations Manual § 631.451 provides:

“Delivery of mail to individual boxes in a residential building containing apartments or units occupied by different addressees (regardless of whether the building is an apartment house, a family hotel, residential units, or business units in a residential area and regardless of whether the apartments or units are owned or rented) is contingent on the following:

“a. The building contains three or more units (above, below, or behind; not side by side) with:

“(1) A common building entrance such as a door, a passageway, or stairs;

“(2) A common street address (some part of the address is shared)

approved by local or municipal authorities.

“b. The installation and maintenance of mail receptacles is approved by the Postal Service.

“c. Each apartment is provided one box, including that of any resident manager or janitor, unless the management has arranged for mail to be delivered at the office or desk for distribution by its employees.

“d. The grouping of the boxes for the building is at a single point readily accessible to the carrier.”

10. 39 U.S.C. § 403(c) provides: “In providing services and in establishing classifications, rates, and fees under this title, the Postal Service shall not, except as specifically authorized in this title, make any undue or unreasonable discrimination among users of the mails, nor shall it grant any undue or unreasonable preferences to any such user.”

11. Further, the Postal Service's stated policy, set out in the Luna Letter, is a regulation enacted outside the scope of the Postal Service's regulatory authority as set forth in 39 U.S.C. § 401(2) and 39 C.F.R. § 211.2(a).

12. 39 U.S.C. § 401(2) provides:

“Subject to the provisions of section 404a, the Postal Service shall have the following general powers: . . . (2) to adopt, amend, and repeal such rules and regulations, not inconsistent with this title, as may be necessary in the execution of its functions under this title and such other functions as may be assigned to the Postal Service under any provisions of law outside of this title[.]”

13. 39 C.F.R. § 211.2(a) provides:

“The regulations of the Postal Service consist of:

“(1) The resolutions of the Governors and the Board of Governors of the U.S. Postal Service and the bylaws of the Board of Governors;

“(2) The Mailing Standards of the United States Postal Service, Domestic Mail Manual; the Postal Operations Manual; the Administrative Support Manual; the Employee and Labor Relations Manual; the Financial Management Manual; the International Mail Manual; and those portions of Chapter 2 of the former Postal Service Manual and chapter 7 of the former Postal Manual retained in force.

“(3) Headquarters Circulars, Management Instructions, Regional Instructions, handbooks, delegations of authority, and other regulatory issuances and directives of the Postal Service or the former Post Office Department. Any of the foregoing may be published in the FEDERAL REGISTER and the Code of Federal Regulations.”

14. San Francisco seeks an order requiring the Postal Service to comply with Postal Operations Manual § 631.45 and 39 U.S.C. § 403(c). Specifically, San Francisco seeks an order requiring the Postal Service to deliver mail to SRO residents (not just to SRO residents living in buildings “grandfathered in” under the policy outlined in the Luna Letter) by placing the mail in the individual, locked mailboxes found at San Francisco SROs that meet the requirements of Postal Operations Manual § 631.45, and to cease unreasonably treating SRO residents differently from other apartment dwellers.

15. The Commission has jurisdiction over this complaint pursuant to 39 U.S.C. § 3662 and 39 C.F.R. §§ 3030 and 3031.

16. Notice and communications about this matter should be sent to:

Dennis J. Herrera, City Attorney
Danny Chou Chief of Complex and Special Litigation
Sherri Sokeland Kaiser (sherri.kaiser@sfgov.org)
Tara M. Steeley (tara.steeley@sfgov.org)
Deputy City Attorneys
City Attorney’s Office
City Hall, Room 234
1 Dr. Carlton B. Goodlett Place
San Francisco, California 94102-4682
Telephone: (415) 554-4691
Facsimile: (415) 554-4747

Michael M. Markman (mmarkman@cov.com)
Kelly Finley (kfinley@cov.com)
Holly Baudler (hbaudler@cov.com)
Bradley A. Chernin (bchernin@cov.com)
Joshua Hurwit (jhurwit@cov.com)
Covington & Burling LLP
One Front Street
San Francisco, California 94111
(415) 591-6000

FACTUAL ALLEGATIONS

A. The City and County of San Francisco and SROs

17. San Francisco is a charter city and county organized and existing under the Constitution and laws of the State of California.

18. Approximately 18,000 San Francisco residents—over 2% of San Francisco's population—live in SROs. These include many elderly, disabled, or low income individuals. For example, in one recent study of SRO residents, the average age of respondents was 55 and nearly half of the respondents received Social Security. (*See* <http://www.sfdph.org/dph/files/commTaskForcesDocs/SROdocs/HSAColSRORpts.pdf> (collecting numerous reports and studies on San Francisco's SROs), attached hereto as Exhibit 2.)

19. SROs in San Francisco are residential or mixed use buildings in which tenants rent single rooms. SRO rooms typically differ from studios in higher income apartment buildings only in that they usually do not have a private bathroom or kitchen; instead, tenants typically share these amenities with other SRO residents. SROs often provide an affordable housing option for persons living on fixed benefits such as social security, disability payments, general assistance and other safety nets. SROs also frequently serve as the housing of last resort for the working poor, particularly families with children. SRO residents sign leases and rental agreements akin to those signed by tenants in apartment buildings.

20. San Francisco relies on the mail to communicate with its residents. San Francisco communicates by mail with residents—including those living in SROs—about medical care, disease prevention, public assistance, elections, and other important civic matters. This is especially important to San Francisco and to those San Francisco residents living in SROs

because these residents are frequently especially reliant on the mail and often do not have regular access to other means of communication, as more affluent individuals often do.

21. San Francisco's reliance on the mails is similar to the reliance of entities like the Postal Service and federal agencies, and of federal office-holders, on the mails to communicate with U.S. citizens (including communications about changes of address, Social Security benefits, Supplemental Security Income benefits, Section 8 housing letters, the U.S. census, and Congressional communications with constituents in mails sent under Congressional frank).

22. In an effort to ensure the delivery of these and other communications sent via the Postal Service, in 2006, San Francisco enacted the Residential Hotel Mail Receptacle Ordinance ("Ordinance"), codified at S.F. Admin. Code § 41E.3. The Ordinance requires owners of SROs to install separate mail receptacles for each residential unit and thus ensure the buildings come into compliance with postal regulations regarding delivery to individual, locked mailboxes in apartment houses.

23. Before enacting the Ordinance, at least one member of the San Francisco Board of Supervisors communicated with the Postal Service in an effort to confirm that, once SROs installed individual locked mailboxes, the Postal Service would begin delivering mail to those individual, locked mailboxes.

B. The Postal Service's Initial Compliance With Postal Operations Manual Regulations

24. Following the enactment of the Ordinance, those owners of SROs where individual, locked mailboxes did not already exist began installing such mailboxes, in compliance with the Ordinance.

25. From the enactment of the Ordinance in 2006 through late 2008, the Postal Service appeared to comply with Postal Service regulations with respect to delivery of mail to San Francisco SROs.

26. As noted in paragraph 9, Section 631.45 of the Postal Operations Manual states delivery of mail to individual mailboxes is contingent on an explicitly enumerated list of factors. Many SROs in San Francisco satisfy each of the factors listed in Section 631.45. Others will satisfy those factors once individual, locked mailboxes are installed.

27. San Francisco is informed and believes, and thereupon alleges, that Section 631.45 of the Postal Operations Manual is a valid Postal Service regulation pursuant to 39 U.S.C. Section 401(2) and 39 C.F.R. Section 211.2(a)(2).

28. SRO residents living in buildings in San Francisco that have installed individual, locked mailboxes and where the Postal Service was delivering the mail to those individual, locked mailboxes have reported a vast improvement in the actual receipt of their mail.

C. The Postal Service Changes Course and Stops Complying With Its Own Regulations

29. On December 18, 2008, San Francisco Postmaster Noemi Luna sent a letter to the Department of Building Inspection (the “Luna Letter,” attached hereto as Exhibit 1) announcing that the Postal Service would no longer deliver mail to individual mail receptacles in SROs, effective January 5, 2009.¹

30. According to the Luna Letter, it would be cheaper for the Postal Service to cut back its mail delivery services to SRO residents. The Letter did not indicate that other

¹ According to the Luna Letter, those SROs—and *only* those SROs—that had been receiving centralized delivery for over 90 days prior to the issuance of the letter would continue to receive centralized delivery.

residential buildings in San Francisco would be subject to the cutbacks. The Luna Letter did not specify the cost-savings that would purportedly be achieved by this step. The Luna Letter also did not reference why there would be a departure from the requirements of Postal Operations Manual Section 631.45.

31. On information and belief, it would not be meaningfully more costly to deliver the mail to individual, locked mailboxes of San Francisco residents living in SROs meeting the requirements of POM § 631.45. Furthermore, regardless of any costs associated with providing these residents centralized delivery, such delivery is required by the Postal Service regulations discussed in this complaint.

32. The Postal Service had been delivering mail to individual boxes at some San Francisco SROs for years. It also provides centralized mail delivery to SROs in other cities. (See Exhibit 3 (Plaintiff City and County of San Francisco's Responses to Defendant United States Postal Service's First Set of Interrogatories, Response to Interrogatory No. 2, *City and County of San Francisco v. United States Postal Service*, No. 3:09-cv-01964-RS (EDL) (June 17, 2010)) and Exhibit 4 (Plaintiff City and County of San Francisco's Responses to Defendant United States Postal Service's Interrogatories (Set Two), Response to Interrogatory No. 28, *City and County of San Francisco v. United States Postal Service*, No. 3:09-cv-01964-RS (EDL) (March 28, 2011)), attached hereto.)

33. The Luna Letter, however, asserts that delivering mail to individual SRO residents in San Francisco is contrary to Postal Service regulations contained in the Domestic Mail Manual ("DMM") and the Postal Operations Manual ("POM").

34. The Luna Letter is not a Postal Service regulation.

35. The Luna Letter has never been printed in the Federal Register. Nor does the Luna Letter qualify for inclusion in the Federal Register.

36. The legal conclusion set out in the Luna Letter is incorrect. Postal carriers are required to deliver mail to individual, locked mailboxes in “apartment houses” and in “residential hotels,” which are both Postal Service categories that unambiguously encompass many SROs.

37. For example, the POM defines “apartment houses” to include all “residential building[s] containing apartments or units occupied by different addresses (regardless of whether the building is an apartment house, a family hotel, residential units, or business units in a residential area and regardless of whether the apartments or units are owned or rented)” as long as the building has (1) at least three units; (2) a common building entrance; (3) a common street address; (4) mail receptacles approved by the Postal Service; (5) one mailbox per residential unit; and (6) mailboxes at a central location readily accessible to the carrier. POM § 631.45. SROs are “residential units,” and they satisfy every requirement for “apartment houses.”

38. Under Postal Service regulations, the Postal Service must provide individual mailbox delivery to SROs in buildings that have individual, locked mailboxes and that meet the criteria set out in POM § 631.45. Yet, the Postal Service has continued to take the position that it will not convert to centralized delivery those buildings meeting the requirements of POM § 631.45.

39. The Postal Service has freely admitted that it does not do “all that it can to provide centralized delivery to all buildings possessing each characteristic described in subheadings a. through d. of [POM §] 631.451.” (United States Postal Service’s Responses to the City and County of San Francisco’s Request for Admission (Set One), Responses to

Admission Nos. 20, 36-37, *City and County of San Francisco v. United States Postal Service*, No. 3:09-cv-01964-RS (EDL) (April 27, 2011), attached hereto as Exhibit 5.)

40. Attached hereto as Exhibit 6 (Plaintiff City and County of San Francisco's Responses to Defendant United States Postal Service's First Set of Interrogatories, Response to Interrogatory No. 3, *City and County of San Francisco v. United States Postal Service*, No. 3:09-cv-01964-RS (EDL) (June 17, 2010)) is a list of SROs in San Francisco as to which San Francisco is informed and does believe identifies addresses of those SROs in San Francisco receiving single-point delivery. A substantial number of these addresses do qualify for centralized delivery under POM § 631.45 and yet do not receive such delivery.

41. The assertion in the Luna Letter that "Postal regulations contained in both the Domestic Mail Manual (DMM) and Postal Operations Manual (POM) provide that single point service is the appropriate mode of delivery for mail addressed to persons in 'hotels, schools, and similar places.' DMM 508.1.7.2; POM 615.2," and that SROs fall under these regulations is misguided, inaccurate, and discriminatory.

42. The fact that SROs are often referred to as "residential hotels" or "family hotels" and that many SROs have the word "Hotel" in their names is not indicative of which Postal Service regulation provides the correct guidance for the type of mail delivery the building is to receive. This is recognized by the Postal Regulations themselves, as POM § 615.2 uses the word "hotel" to describe certain buildings that are to receive single-point delivery while POM § 631.451 uses the phrase "family hotel" to describe certain buildings that are to receive centralized delivery.

43. The Postal Service has further incorrectly claimed that POM § 631.45 only applies where the Postal Service has, through its own, apparently standardless, exercise of

discretion, already determined that a building is an “apartment house.” (United States Postal Service’s Responses to the City and County of San Francisco’s Interrogatories (Set One), Response to Interrogatory No. 11, *City and County of San Francisco v. United States Postal Service*, No. 3:09-cv-01964-RS (EDL) (Sept. 13, 2010), attached hereto as Exhibit 7.) This interpretation obviates one of the clear purposes of the regulation—namely, defining which “residential building containing apartments or units occupied by different addressees” are to receive delivery to individual, locked mailboxes.

44. San Francisco residents living in SROs that meet the requirements of POM § 631.45 (or that will meet the requirements once appropriate individual, locked mailboxes are installed) are being given inferior service by the Postal Service as compared to San Francisco residents living in “apartments” simply because those living in SROs are amongst the poorest of San Francisco’s residents and can only afford to live in the “hotel” rooms that comprise SROs. The Postal Service incorrectly interprets “hotel” in this context as a statement about transience (the types of buildings POM § 615.2 denotes as buildings that should receive single-point delivery) rather than as an indicator of poverty.

D. The Impact of the Postal Service’s Single-Point Delivery to San Francisco and its Residents

45. As a direct result of the Postal Service directing its mail carriers to use single-point delivery at San Francisco’s SROs—that is, to leave a bag of the building’s mail near the entryway or at the desk and then leave—there is an obvious and real danger that mail be stolen, misdelivered, or otherwise “disappear.” For many sensitive pieces of mail containing monthly benefits checks, postal orders, critical health information, treasured personal letters and the like to SRO residents in San Francisco, this has in fact happened.

46. In concurrent litigation, the Postal Service has characterized its use of single-point delivery to SROs despite the Postal Service's own regulations calling for centralized delivery as "a trifling" problem when compared with the other problems facing the generally economically disadvantaged community living in San Francisco's SROs. (Defendant's Opposition to Plaintiffs' Motion for Protective Order, *City and County of San Francisco v. United States Postal Service*, No. 3:09-cv-01964-RS (EDL), at 5 (April 12, 2011), attached hereto as Exhibit 8.) The Postal Service, however, is not permitted to and should not be making such characterizations of the lives of its customers or of the Postal Service's impact on them by virtue of its failure to comply with its own regulations. Nor does the Postal Service's characterization of the life of SRO residents relieve the Postal Service of its obligations to follow its own regulations, including POM § 631.45.

47. The Postal Service's characterization of its use of single-point delivery at San Francisco's SROs as a "trifling" problem further ignores the fact that the Postal Service's stated policy can and does inflict actual harm on some of San Francisco's most vulnerable residents. SRO residents report that they have been unable to pay the rent, faced eviction proceedings, been forced into homelessness, lost crucial financial and medical benefits, and grown estranged from family and friends as a result of the Postal Service's delivery policy. For instance, one resident infected with Hepatitis C did not learn of his diagnosis until more than a year later, when he happened to discover in his medical file a copy of a long-undelivered letter informing him he had tested positive for the life-threatening blood-borne pathogen. Another long-term SRO resident who had been diagnosed with terminal cancer missed appointment notices and even lost Medical coverage because he did not receive his mail. Still more SRO tenants lost the opportunity to receive such state and federal benefits because they did not receive notices informing them of

their eligibility until it was too late. Many SRO residents have never received mail sent from loved ones, benefits checks, and other critical pieces of mail.

48. After dissemination of the Luna Letter, San Francisco has been additionally harmed because a subset of SRO landlords subsequently refused to comply with the Ordinance and to install individual, locked mailboxes, because they viewed compliance as futile since the Postal Service refuses to deliver mail to the individual, locked mailboxes.

NATURE OF THE EVIDENCE SAN FRANCISCO HAS OR EXPECTS TO OBTAIN DURING DISCOVERY TO SUPPORT THE FACTS ALLEGED IN THE COMPLAINT

49. San Francisco intends to support paragraphs 1 through 48 with documentary evidence possessed by San Francisco and with the testimony of San Francisco employees and current and former San Francisco residents who currently reside in or have formerly resided in SROs.

50. San Francisco does not expect to seek extensive discovery from the Postal Service in this matter if it can utilize discovery obtained from the Postal Service during the course of the related litigation in the United States District Court for the Northern District of California (described in paragraphs 53-54 below). Such evidence would include:

- a) Documents, including but not limited to all communications, relating to the decision to ignore POM § 631.45 and related regulations.
- b) Documents, including but not limited to all communications, relating to the authority of the San Francisco Postmaster to issue the Luna Letter.
- c) Identification of the addresses of SROs in San Francisco as to which the decision in the Luna Letter is continuing to be applied instead of the rules established by POM § 631.45 and related regulations.

51. The additional evidence referenced in paragraph 50 are documents and testimony in the sole possession of the Postal Service.

52. San Francisco reserves its rights to seek additional discovery.

RELATED PROCEEDINGS

53. None of the complaints set out here are pending in or have been resolved by an existing Commission proceeding.

54. On May 5, 2009, San Francisco filed a complaint against the Postal Service and additional defendants in the United States District Court for the Northern District of California (Civil Case No. 3:09-cv-01964-RS (EDL)) (“District Court Complaint”). The District Court Complaint seeks an injunction to prevent Constitutional violations arising from the Postal Service’s conduct described in this Complaint. The District Court Complaint does not seek monetary damages. The grounds for relief in the District Court Complaint are separate and distinct from the grounds for relief set forth in Counts I and II of this Complaint. Nonetheless, San Francisco will agree to a stay of the District Court proceedings should the Commission issue a notice of proceeding under 39 C.F.R. § 3001.17 with respect to this Complaint. Further, if San Francisco prevails on this Complaint before the Postal Regulatory Commission, San Francisco anticipates that it may seek dismissal of the District Court Complaint without prejudice.

CERTIFICATION REGARDING ATTEMPTS TO MEET AND CONFER TO RESOLVE OR SETTLE COMPLAINT

55. During the course of the parallel District Court litigation described above, San Francisco conducted a mediation of its dispute with the Postal Service, including San Francisco’s complaints relating to the Postal Service’s violation of POM § 631.45 and related regulations. The parties were not able to resolve their dispute.

56. In light of San Francisco’s unsuccessful attempts to resolve this matter with the Postal Service, and given the Postal Service’s ongoing vigorous litigation of the District

Court litigation referenced above, San Francisco believes that additional steps to settle the matter prior to the filing of this Complaint would be futile.

COUNT I
Declaratory Relief

57. San Francisco incorporates by reference the allegations in paragraphs 1 through 56 above as though fully set forth herein.

58. An actual controversy has arisen and now exists between San Francisco and the Postal Service regarding the Postal Service's decision to provide SROs in San Francisco with single-point mail delivery.

59. The Postal Service, by and through the Luna Letter, concludes that SROs in San Francisco are not entitled to centralized mail delivery to individual, locked mailboxes. The Luna Letter is not a federal regulation and is not a valid Postal Service regulation pursuant to 39 U.S.C. § 401(2) and 39 C.F.R. § 211.2(a).

60. Buildings in San Francisco that meet the requirements of POM § 631.45 for classification as "apartment houses" and/or "residential hotels," are entitled to mail delivery to individual, locked mailboxes per POM § 631.45 and related regulations.

61. Buildings in San Francisco that meet the requirements of POM § 631.45 are entitled to mail delivery to individual, locked mailboxes regardless of whether the buildings are called SROs, whether the buildings include rooms that are leased on a single residential occupancy basis, or whether the buildings have names that include the word "Hotel."

62. The Postal Service, by and through its agents, has failed to enforce its own regulations concerning delivery of mail to individual, locked boxes in buildings that meet the requirements of POM § 631.45.

63. The Luna Letter declaring that SROs in San Francisco would no longer be eligible for delivery to individual mailboxes beginning in January 2009, and the subsequent adherence to and enforcement of the Luna Letter by the Postal Service, was unlawful and in contravention of the Postal Service's regulations.

64. In the alternative, the Postal Service, by and through the Luna Letter, has engaged in unlawful rulemaking that effectively modifies POM § 631.45 and related regulations, without use of the proper procedures.

65. As a result of these disputes, a justiciable controversy exists between San Francisco and the Postal Service.

66. San Francisco seeks a determination by the Commission that the Postal Service must comply with POM § 631.45 by delivering the mails to individual, locked mailboxes in SROs in San Francisco meeting the requirements of POM § 631.45, regardless of whether the building is classified as an "SRO," includes single resident occupancy rooms, or includes the word "Hotel" in the name of the building.

COUNT II
Violation of 39 U.S.C. § 403(c)

67. San Francisco incorporates by reference the allegations in paragraphs 1 through 56 above as though fully set forth herein.

68. As alleged above, the Postal Service's decision to refuse to deliver mail to individual, locked mailboxes at SROs while at the same time providing delivery to individual, locked mailboxes in other similar buildings constitutes unreasonable discrimination among users of the mails and grants undue and unreasonable preferences to certain users of the mails.

69. Upon information and belief, the Postal Service also at times provides delivery to individual mailboxes at SROs in other cities across the United States, thereby making the Postal Service's discrimination even more arbitrary, irrational and discriminatory.

DEMAND FOR RELIEF

WHEREFORE, San Francisco prays that this Commission enter judgment in its favor on each and every claim for relief set forth above and award it relief including, but not limited to, the following:

1. For hearings on this Complaint;
2. For a declaration that the Postal Service's refusal to deliver mail to individual, locked mailboxes of SRO residents living in SROs in San Francisco meeting the requirements of POM § 631.45 violates the Postal Regulations, including POM § 631.45;
3. In the alternative, a declaration that the policy enacted by the Luna Letter was an improper rulemaking, rendering the policy null and void;
4. For a declaration that the Postal Service's refusal to deliver mail to individual, locked mailboxes of SRO residents in San Francisco simply because of their status as SRO residents is unreasonable discrimination among users of the mails and grants undue and unreasonable preferences to certain users of the mails;
5. For an order directing the Postal Service to follow its own regulations and to deliver mail to individual, locked mailboxes at eligible SROs in San Francisco as required by POM § 631.45 and 39 U.S.C. § 403(c); and
6. For such other and further relief as the Commission may deem proper.

San Francisco, California 94102

Counsel for the City and County of San
Francisco

Michael M. Markman

Kelly P. Finley

Joshua D. Hurwit

Bradley A. Chernin

Covington & Burling LLP

One Front Street

San Francisco, California 94111

Counsel for the City and County of San
Francisco

May 18, 2011

EXHIBIT 1



December 18, 2008

Vivian L. Day
Acting Director
Department of Building Inspection
1660 Mission Street
San Francisco, CA 94103

Subject: Mail receptacles at Single Room Occupancy Residential Hotels

Dear Ms. Day:

It has come to our attention that the City and County of San Francisco Department of Building Inspection has cited a number of owners of Single Room Occupancy residential hotels (SROs) who may not be complying with San Francisco Housing Code Section 1002.41E ("section 41E"). That regulation requires SRO owners to install mail receptacles that comply with Postal Service requirements, with an individual box for each occupant. It is our understanding that the deadline for compliance was in 2007.

In the written notice of noncompliance, the Building Inspector instructs the owners:

Provide a mail receptacle for each residential unit as required by section 41E of the San Francisco Administrative Code. Installation and maintenance of the mail receptacles shall meet all the requirements of the U.S. Postal Service. Contact Dan Bernardo of the U.S. Postal Service at 415-550-5707 for the approved model number and placement of the mail receptacles.

I am writing to summarize the Postal Service's activities to date with regard to Section 41E and to clarify our obligations. Section 41E was passed with no input from the Postal Service. I met with representatives of the Board of Supervisors shortly after it was enacted and informed them that Postal Service regulations provide for single point mail delivery to SROs. Under single point delivery service, the Postal Service delivers mail for residents of the address in bulk to building management, which is responsible for distributing the mail to residents and re-directing mail to former residents. In contrast, residents in structures

eligible for apartment delivery under postal policies are served through individual receptacles assigned to each apartment.

Postal regulations contained in both the Domestic Mail Manual (DMM) and Postal Operations Manual (POM)¹ provide that single point service is the appropriate mode of delivery for mail addressed to persons in "hotels, schools, and similar places." DMM 508.1.7.2; POM 615.2.

The main focus of my initial discussions with City representatives was the criteria a SRO would have to meet in order to convert to an apartment building, for the purpose of mail delivery. After that meeting Postal Service Attorney Jennifer Angelo discussed Section 41E with Judy Boyajian of the San Francisco City Attorney's office, who assured her that Section 41E was not an attempt to compel the Postal Service to change its policies or regulations concerning delivery to SROs.

Since that time, the U.S. Postal Service has voluntarily assisted a number of SRO owners in their efforts to comply with Section 41E, by providing them information on Postal Service mail receptacle requirements and advising them on the receptacles suited to their particular circumstances. In addition, we extended delivery to individual unit mail receptacles at some of those SROs, which under Postal Service regulations was inconsistent with our policies.

Unfortunately, current fiscal shortages have compelled us to examine all of our operations, including those related to delivery. From that, we have determined it would not be prudent for the Postal Service to continue to work directly with SRO owners on compliance with Section 41E. Further, the Postal Service will not offer individual mail receptacle delivery to additional SROs, and will be taking action this week to rescind individual delivery that was extended to any SRO within the past 90 days. This action will be effective January 5, 2009. For those SROs that have been receiving individual delivery for more than 90 days, we will continue to provide it.

While we lack the resources to work with individual SRO owners, we can provide the information they will need to meet Postal Service requirements for mail receptacles. Attached please find a list of vendors who manufacture apartment house and wall mounted centralized mail receptacles in accordance with Postal Service requirements. The San Francisco Department of Building Inspection is free to distribute this information as necessary.

¹ The DMM and POM are both considered to be postal regulations under 39 C.F.R. 211.2(a)(2). In addition, the DMM is incorporated by reference in the Code of Federal Regulations, 39 C.F.R. 111.1, and its provisions may be accessed on line at the Postal Service's Postal Explorer website (www.pe.usps.gov).

I have been advised that the Postal Service may not be compelled to comply with or participate in the enforcement of Section 41E. The activities of federal agencies are protected by the Supremacy Clause of the United States Constitution from direct state regulation unless Congress provides otherwise. Thus, the Supremacy Clause preempts the application of non-federal laws that frustrate or interfere with the operations of the Postal Service.

I would appreciate it if future citations issued to SRO owners under Section 41E omit any reference to Dan Bernardo and his contact information. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Noemi Luna", with a long horizontal flourish extending to the right.

Noemi Luna

cc: Congresswoman Nancy Pelosi
Senator Diane Feinstein
Senator Barbara Boxer
San Francisco City Attorney Dennis Herrera

EXHIBIT 2



Gavin Newsom, Mayor

Department of Aging and Adult Services

Trent Rhorer, Executive Director

November 2, 2009

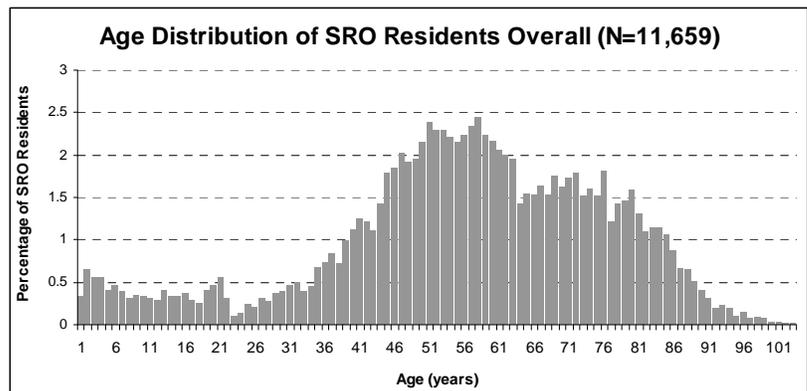
To: SF-HSA Managers/City Department Representatives
From: Dan Kelly
Re: Fiscal and Policy Implications for Single Room Occupancy Hotels

This memo highlights findings from previous SRO studies, considering them within the context of city policy, and adds new fiscal analysis and research. It is organized into sections that describe three different SRO populations: 1) seniors; 2) adults with disabilities; and 3) families and children.

Seniors

San Francisco’s official policy is to support seniors to “age in place” in their own homes (Long Term Care Coordinating Council, 2009). Though often overlooked, many low income seniors call SROs home. These hotels provide affordable, centrally-located housing that allows older persons to remain in the community. Yet San Francisco has no comprehensive strategy for serving a group that, because of poverty, isolation, and hazardous physical environments, is at particular risk for entering institutions.

Ms. Fribourg matched SRO addresses against caseload data from city programs and found over 11,000 unique clients lived in these hotels.¹ Based on Ms. Fribourg’s estimate of 18,500 total SRO residents in San Francisco, it would mean that 63% of all SRO residents are either clients of SF-HSA or are receiving SSI. The data match was used to infer a profile of who was living in SROs. The accompanying chart depicts the ages of SRO residents in the client database. The mean age was 55 years, but more than 5,000 were over the age of 60, comprising 43% of the total clients in SROs. Other findings about seniors from the data match include:



¹ The 530 SRO addresses were matched against administrative data from the following programs: CalWORKs; subsidized child care; children’s protective services; Department of Children, Youth, and Families; Medi-Cal; County Adult Assistance Program; Food Stamps; SSI; In Home Supportive Services; Office on the Aging; and Adult Protective Services. The match revealed that 11,660 unique clients lived in SROs. Please see Ms. Fribourg’s study for more detailed information.

- ❖ *Asian Pacific Islanders (API) comprise 37% of the city's seniors, but among senior clients living in SRO hotels, they are 61%. The majority of API senior clients (1,611) live in Chinatown, although more API seniors (673) live in Tenderloin SROs than Whites (537). SRO seniors are also more likely to be male. Men comprise only 43% of all seniors in San Francisco, but 56% of SRO seniors in the client database are male.*
- ❖ *Seniors in SROs are exceptionally poor, but have none of the rental protections of seniors in public housing. Of all seniors in the database, two thirds (3,371) rely on monthly SSI checks of \$991. The average monthly SRO rent of \$589 would claim almost 60% of their income, leaving them with approximately \$402 for living expenses. Residents of public housing pay no more than 30% of their monthly adjusted gross income for rent.*
- ❖ *Seventy one percent of seniors in SRO hotels live alone. Data from the Office on the Aging suggests that about half of SRO seniors have never been married, with another 18% divorced or separated and 16% widowed.*

In addition to social isolation, seniors living in SROs are often trapped by physical barriers. For example, only nine of Chinatown's 144 SROs have elevators, yet Chinatown has a higher density of seniors than any neighborhood in the city. In a survey of In Home Supportive Services (IHSS) recipients who had mobility impairments and lived in Chinatown SROs, 40% reported that they left their rooms once a week or less (San Francisco Department of Aging and Adult Services, 2006).

In focus groups, respondents often described Chinatown SROs as having steep stairs, unsteady banisters, and torn tiles. Falls are a common factor in the decline of seniors. A study by the San Francisco Department of Public Health (1999) found that seniors accounted for almost half of all injury-related hospitalizations in San Francisco, and falls accounted for 77% of those hospitalizations. According to the Centers for Disease Control and Prevention (2005), falls often hasten the decline of seniors' ability to live independently.

Eleven percent (2,374 total) of all IHSS recipients live in SRO hotels. They tend to be slightly younger and more capable of caring for themselves than non-SRO residents who receive these services, according to a numeric ranking system that indicates clients' level of functioning. This may be expected, as surviving in an SRO likely requires a higher level of independence. *It likely also reflects that as they age, seniors living alone in hazardous SROs are more likely to enter institutions than those who live with family in safe housing.*

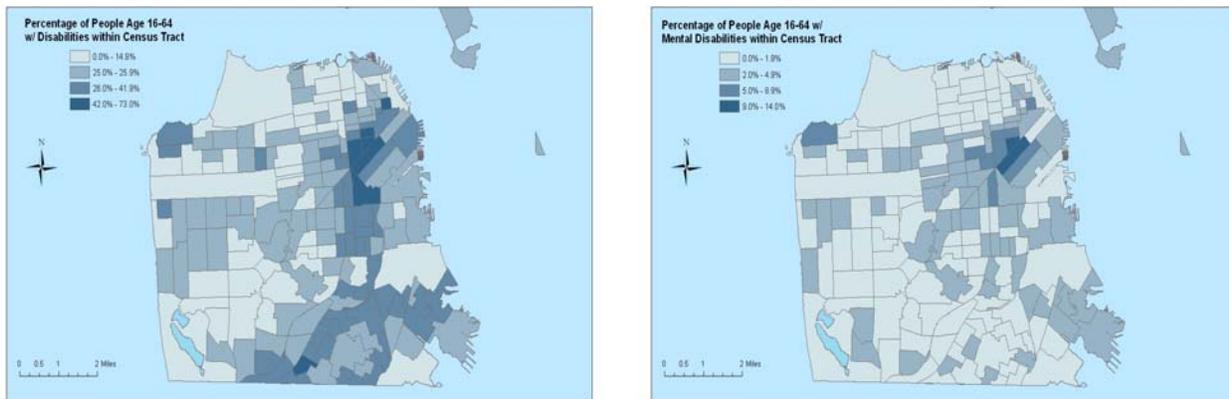
The cost of keeping seniors safely in SROs can be contrasted with the cost of a skilled nursing facility. The total annual cost of a bed at Laguna Honda Hospital is \$166,356 (FY 07/08), including local general fund costs of \$66,026. A 2008 analysis of SF-HSA's Community Living Fund, a local, flexible funding stream aimed at keeping individuals out of institutions, found that the majority of clients needed an average of \$2,088 annually in case management and purchase of services, plus an additional \$24,228 annually of IHSS to remain safely at home. All of the Community Living Fund, and 16% of IHSS costs come from local general fund, making the total local cost \$5,965. Therefore, the annual difference in local general fund between keeping a non-intensive senior in a Chinatown SRO hotel --where he or she wants to live -- versus Laguna

Honda would be \$60,061. If a senior can be maintained in an SRO for an additional five years, it could create a savings of \$300,305. About 8,000 seniors live in SRO hotels.²

To help seniors in SROs age in place, San Francisco needs to develop creative strategies across city departments to reduce their isolation, make their homes safe, and provide greater access to the community's resources. The geographic concentration of at-risk seniors offers opportunities for precisely targeted strategies, as is discussed further in the recommendations section of this report.

Younger Adults with Disabilities

More younger adults (ages 16 – 64) have disabilities in San Francisco than seniors, and the largest concentration of them is in the Tenderloin and South of Market neighborhoods, followed by the inner Mission and Chinatown (Department of Aging and Adult Services, 2006). In particular, persons with mental disabilities are concentrated in the Tenderloin and South of Market. The maps below illustrate the prevalence of persons with disabilities by census tract.



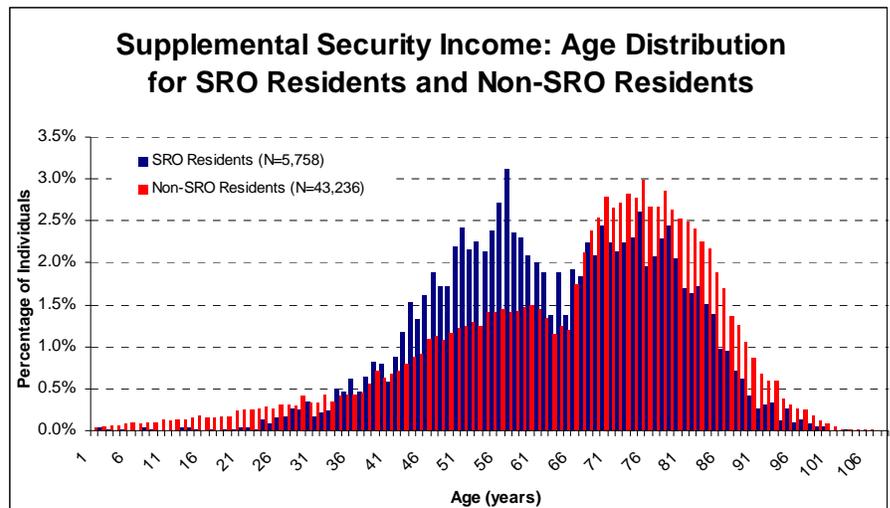
Almost 19,000 San Franciscans between the ages of 16 and 64 rely on SSI, 16% of whom (2,962) live in SRO hotels. The chart on the next page compares the ages of individuals receiving SSI in San Francisco with those of SSI recipients living in SROs, illustrating a skew toward younger adults with disabilities. Another 1,500 persons under the age of 65 live in SRO hotels and rely on CAAP. Seventy eight percent of these CAAP recipients are male, with the mean age being 48. A 2003 SF-DPH study found that half of CAAP recipients seeking employment assistance had received publicly-funded behavioral health services.

For Ms. Fribourg's study, the San Francisco Department of Public Health matched SRO addresses against its behavioral health databases. It found over 3,500 substance abuse treatment clients in its databases had SRO addresses, including 714 who received treatment in 2008. Over half lived in Tenderloin SROs; about one-fourth, South of Market SROs. The match also found

² The total number of seniors in SROs is not known, but 43% of the 11,160 persons in the client database are seniors. Ms. Fribourg's census analysis estimated that 18,543 people are living in SROs. Forty three percent of the difference would be an additional 3,175 seniors, for a total of 8,192. Though speculative, this number seems reasonable.

that 1,773 SRO residents received mental health services in 2008. Over half (992 individuals) lived in the Tenderloin, with SOMA residents being the second largest group (389). Tenderloin SRO residents were also more likely to use crisis/emergency mental health services (229 individuals), with SOMA SRO residents being the second highest (106).

Many SRO residents are prone to using expensive, emergency services, including:

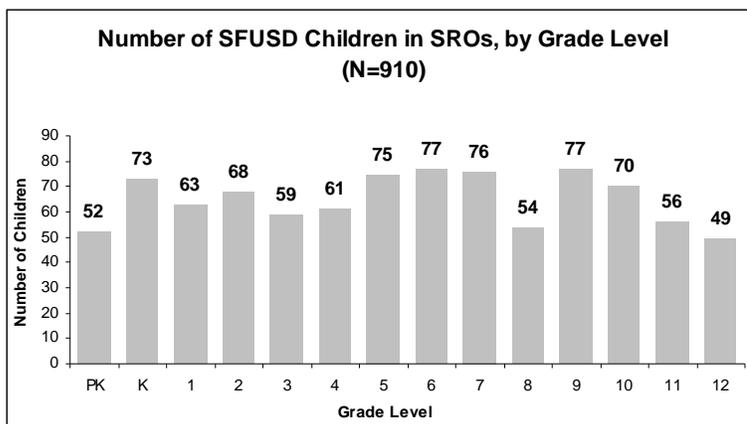


- ❖ **Ambulance Services:** Many Tenderloin and SOMA SRO residents severely undermine their health through self neglect and risky behavior and require ambulance calls. For example, a 2003 study found that heroin-related overdose was the single largest category of accidental deaths in San Francisco, surpassing suicide, homicide, and traffic fatalities. Almost half of heroin-related overdose deaths occur in SROs. One third of such deaths occur within 500 meters of the intersection of Golden Gate and Jones streets (Davidson et al., 2003).
- ❖ **Emergency Medical Services:** SRO residents are also prone to using emergency medical services. For the 1,037 SRO residents in the Tenderloin who used emergency services in 2008, the average annual cost was \$1,114 per person, or \$1.15 million for SRO residents in this one neighborhood. Across neighborhoods, 1,895 adult SRO residents used emergency services on 3,087 occasions, costing the city approximately \$2.15 million.
- ❖ **Charity Care:** Many SRO residents have no health insurance. In the SRO client database, almost 1,500 clients received County Adult Assistance Program (CAAP) assistance but not Medi-Cal. According to SF-DPH (2009), the supervisory district that encompasses the Tenderloin and SOMA had substantially more uninsured applicants for charity healthcare than any other district, with 16,745 applicants, over 17% of the total charity care applicants. The Mission was next highest (11,976 applicants, 13% of total).

These figures are most likely undercounts, since many adults with disabilities interlace periods of living in SROs with episodes of street homelessness. In focus groups, nonprofit case managers described a cycle in which indigent persons, especially persons with mental illness, cycled from private SROs to shelters to the street. While data on SRO vacancies is contradictory, the most recent survey by the Department of Building inspections suggests that as many as 5,400 SRO units may be vacant, which contrasts with the city’s homeless population of 6,500. These vacancies present opportunities for partnership that are discussed further in the recommendations section.

Children and Families

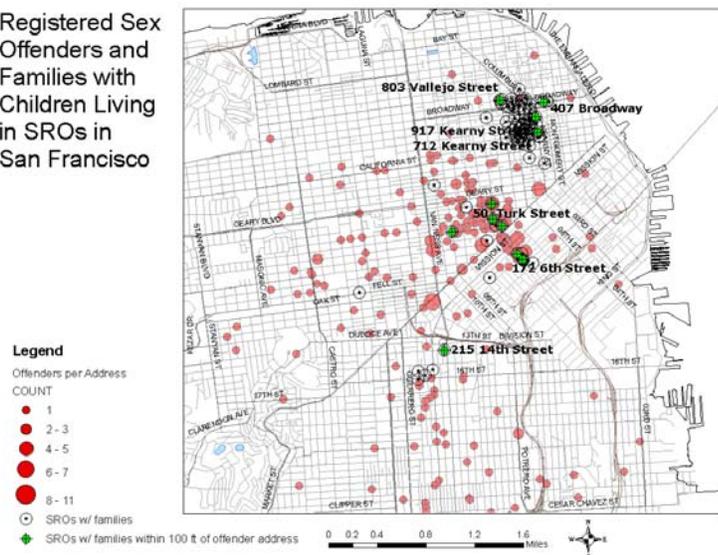
According to a San Francisco Board of Supervisors decree, families living in SROs are homeless. Yet the number of San Francisco Unified School District students living in private SROs is 910. They are evenly distributed across grades, with 29% in high school. A reasonable estimate of the total number of children living in SROs, including pre-school age children and those attending private schools, would be 1,100 – 1,200. Assuming the presence of siblings, the number of families would be lower. Most of these children live in Chinatown (65%), are Chinese (59%), and are English language learners (60%). They are evenly distributed across grade levels, with 28% (252) being high school students.



The lack of space in SROs places particular stress on families, making it difficult for children to study and play, for parents to have appropriate privacy, and for older children and youth to share their homes with friends. Since SROs are planted in high crime neighborhoods, residents are exposed to danger when they go outside. *Between March and June, 2009, more than half of all San Francisco's crimes in the following categories occurred in the four neighborhoods with SROs: assault; burglary; drug/narcotic, larceny/theft, robbery, and forcible sex offences.* Thirty-one percent occurred in just the Tenderloin and Chinatown neighborhoods. Tenderloin and SOMA SROs are particularly unsafe for children. The accompanying map compares the location of SRO families with the addresses of registered sex offenders.³

Families living in SROs use city services unevenly. Just 29 children in SROs receive subsidized child care, and 30 participate in First Five programs. Though 77% of students living in SROs participate in the school district's Free and Reduced Lunch program, only 60 children receive Temporary Assistance to Needy Families (TANF). The Department of Children, Youth, and Families has the highest SRO penetration rate, especially through after school programs like the Chinatown Beacon Center, serving 514

Registered Sex Offenders and Families with Children Living in SROs in San Francisco



³ Data drawn on June 4, 2009 from San Francisco Police Department website (http://www.sfgov.org/site/police_index.asp) for the period between March 7th and June 4th, 2009.

children. Families in SROs often use the city's medical services: in a one year period 195 children from SROs made 600 primary care visits to city clinics, and 69 were inpatients at SFGH. Children in Tenderloin SROs were more likely to use emergency services (22 total) and be inpatients (41).

Children in the Tenderloin and SOMA SROs appear to have worse outcomes than those in Chinatown. More students in the Tenderloin (16%) and SOMA (22%) SROs receive special education services. Over four years, 655 children living in SROs were subjects of child abuse reports, with 213 being under the age of two, most from the Tenderloin and SOMA. Reports about children living in SROs were more likely to involve caretaker absence and neglect.

It should also be recognized that students living in Chinatown SROs, who form the majority of SRO students, score higher on standardized tests than the average school district student and are less likely to be receiving special education services. Nevertheless, raising children in a room less than 8 X 10 feet in a Chinatown SRO must be stressful, and information is not available about parent indicators of stress. School performance is a narrow measure of child outcomes.

Though the Board of Supervisors has identified SROs as unsuitable housing for families, this global policy may impede efforts that acknowledge the reality of the city's housing shortage and make SROs more habitable for families. Directions for city policies related to families in SROs are discussed in the next section.

Recommendations

As described by Ms. Friebourg, SRO residents outnumber people living in public housing developments, but have none of their advantages. The San Francisco Housing Authority (SFHA) has resident councils and makes decisions in public forums. Besides private security officers, SFHA has MOUs with the police department for community policing, and screens housing applicants for felonies. It also has MOUs with non-profits and can apply for grants. Each family development has a Head Start program.

In contrast, private SROs are businesses. Owners want to maximize profit. Yet by housing such vulnerable populations, the SRO business model implicitly relies on expensive city-funded services. Though not organized like the Housing Authority to achieve specific outcomes, the city has an extensive economic relationship with privately owned SROs. On an ad hoc basis, it directly rents about 300 "stabilization beds" as well as rooms for probation, treatment, and other purposes across departments. Moreover, the city's large scale entry into the SRO sector through its Housing First initiative, filling large hotels that had high vacancies, has drawn residents away from privately operated SROs and may have altered the market. By recognizing this economic relationship, San Francisco can create incentives to improve the lives of SRO residents and minimize their use of expensive city services. Elements of a broad strategy might include:

- ❖ ***Develop mutually beneficial partnerships with SRO owners.*** Too often the relationship between city government and SRO owners has focused on monitoring health and safety codes, which are non-negotiable, but which should not eclipse the possibility for

partnerships between owners and city departments to improve the well-being of SRO tenants. For example, the city could develop loan programs or matching fund strategies that encourage SRO hotel owners to install bathroom grab bars and fix hazards, reducing the risk of hospitalization for large groups of seniors. One finding of the attached studies is that private SROs may have a large number of unwanted vacancies. Owners want their hotels to be fully occupied with stable tenants; the city wants to minimize costly services. These are mutually beneficial goals worthy of an explicit strategy.

- ❖ ***Develop desk clerks as professionals.*** One SRO owner who was interviewed noted that hotel staff seldom know how to approach persons with mental illness, much less recognize signs that a resident has stopped taking medication. Rather than calling crisis intervention, they call the police. An exemplary model for training desk clerks has been developed by the Community Housing Partnership, which covers such topics as “customer service, safety, emergency procedures, de-escalating conflicts, and setting boundaries.” At this time, however, the training is only used by community based organizations that manage hotels. On an ad hoc basis, the city directly rents about 300 “stabilization beds” in private SROs, as well as rooms for probation, treatment, and other purposes across departments. Yet it has no formal standards for desk clerks in those hotels where it rents rooms. The city should rent only in hotels with trained desk clerks. Nonprofit organizations that rent SRO rooms should abide by the same standard. With trained clerks, SROs would work with health and social service providers proactively and prevent the use of emergency services.
- ❖ ***Geographic caseloads.*** City caseworkers often have clients living in SROs, but their caseloads are not organized geographically. By concentrating SRO residents in a few caseloads, caseworkers can build knowledge about SROs, collaborate more readily across programs with other geographically assigned caseworkers, and build relationships with desk clerks and tenants that would result in earlier referrals of new clients and more proactive phone calls about existing clients who are struggling.
- ❖ ***Target outreach:*** The data matches that were conducted for the current studies can be used to identify which hotels have large concentrations of at-risk individuals – families, disabled persons, and seniors. With the owners’ cooperation, programs can provide efficient, targeted outreach that engages high-risk individuals in services like Healthy San Francisco that would mitigate the use of costly city services.
- ❖ ***Organize CBO contracts strategically.*** Many nonprofits are serving SRO residents, and most receive city funding. Rather than limiting itself to drop-in models of service delivery, the city can contract for services that target specific hotels where high risk individuals live, with an outcome measure that they retain their housing. Even in the midst of a depressed budget cycle, San Francisco has program resources that can be reconfigured to keep SRO residents out of institutions, emergency care waiting rooms, and homeless shelters.
- ❖ ***Fund more program beds.***⁴ Given that SROs appear to have vacancies, the city should explore expanding the use of program beds to achieve specific interventions that would allow clients better odds at changing their lives. For example, SF-HSA could reserve

⁴ A program bed is one rented by SF-HSA or another agency and provided to a client for program purposes. The client is not the building tenant and does not receive tenancy rights. If the client drops out of the program, he or she loses the unit. Once the client completes the program, however, he or she could be given the opportunity to assume tenancy in the unit.

program beds for homeless clients receiving SSI advocacy, ensuring that the clients are situated during the application process, and possibly be reimbursed for rent through the retroactive award of SSI.

- ❖ ***Prioritize SRO families:*** Until they can enter better housing, families in SROs need strategies that improve their current situation. For example, since such a high number of infants in SROs are referred to children's protective services, a wise prevention policy would specify that any child born to parents living in an SRO is assigned a public health nurse as a home visitor. To ensure that children spend as many hours as possible in enriched environments outside of SROs, the city should allow them to rise to the top of waiting lists for subsidized child care, early education, and after-school programs.
- ❖ ***Incorporate SROs into city disaster planning:*** SF-HSA recently responded to a fire in a Chinatown hotel without elevators and discovered a 91 year old person with a wheelchair and an oxygen bottle who was living on an upper floor. In the event of a large scale disaster, the city could be faced with hundreds of vulnerable persons living in environments that would be hard to evacuate them from or return them to. Furthermore, the 1989 Loma Preita earthquake increased the city's homeless population by damaging a large number of SRO hotels. San Francisco should consider the role of SRO hotels as it thinks about longer-term rebuilding challenges related to major disasters.

SROs are a valuable asset to San Francisco, housing vulnerable populations and acting as a safety valve on homelessness. Without a coordinated strategy for working with SROs, however, the city is missing an opportunity to reach large concentrations of persons who are at extreme risk to use expensive city services. In the next few weeks, SF-HSA will be organizing a forum of city departments to start a discussion of how to use the city's resources more strategically to meet the needs of SRO residents.

References

Centers for Disease Control and Prevention, Home and Recreational Safety. *Fact Sheets: Falls Among Older Adults: An Overview*. June, 2005. Downloaded on June 5, 2009 from: www.cdc.gov/HomeandRecreationalSafety/Falls/adultfalls.html.

Community Housing Partnership/Supportive Housing Employment Collaborative. *Desk Clerk Training Program Course Syllabus*. Received from Christine E. Galvez, Director of Employment and Training, Community Housing Partnership, July 9, 2009.

Davidson, Peter J., McLean, Rachel L., Kral, Alex HSA, Gleghorn, Alice A., Edlin, Brian R., and Moss, Andrew R. *Fatal Heroin-Related Overdose in San Francisco, 1997-2000: a Case for Targeted Intervention*. *Journal of Urban Health: Bulletin of the New York Academy of Medicine*, Vol. 80, No. 2, June 2003.

Long Term Care Coordinating Council. *Living With Dignity in San Francisco: A Strategic Plan to Make Improvements in the network of Community Based Long Term Care and Supportive Services for Older Adults and Adults with Disabilities*. San Francisco Department of Aging and Adult Services, February, 2009.

San Francisco Department of Aging and Adult Services. *Community Needs Assessment*. September, 2006.

San Francisco Department of Human Services. *Profile of PAES Recipients and Factors that Influence PAES Outcomes: Analysis of PAES Recipients Enrolled January 1999 to June, 2000*. Downloaded on September 2, 2009 at: <http://www.ci.sf.ca.us/site/frame.asp?u=http://www.dph.sf.ca.us/>.

San Francisco Department of Public Health. *Injuries to San Francisco Seniors: Defining the Problem and Prioritizing Prevention Strategies*. June, 1999. Downloaded on September 2, 2009 at: <http://www.ci.sf.ca.us/site/frame.asp?u=http://www.dph.sf.ca.us/>.

San Francisco Department of Public Health, Office of Policy and Planning, *Fiscal Year 2007 San Francisco Hospital Charity Care Summary*, January, 2009. Downloaded on September 2, 2009 from <http://www.ci.sf.ca.us/site/frame.asp?u=http://www.dph.sf.ca.us/>.



December 3, 2009

To: SF-HSA Managers/City Department Representatives
From: Dan Kelly
Re: Single Room Occupancy Hotels

This memo introduces four studies of San Francisco's Single Room Occupancy (SRO) hotels. These are an initial effort to understand the SRO community, especially the 88% of hotels that are privately owned and operated, as well as to act as a starting point for discussing how city departments might work together to serve SRO residents more strategically.

Over 18,000 low-income San Franciscans live in SROs, compared to 12,000 in public housing developments. Yet poverty in SROs is different than in public housing. The profile of residents is different; the environments are different. SROs offer a unique opportunity to reach clusters of the city's most vulnerable citizens. Eight thousand seniors, many at risk of institutionalization, live in SROs. Younger adults with disabilities are concentrated in Tenderloin and South of Market SROs, often using expensive city services. Over 1,100 children live in SROs.

Three of the four studies were conducted by graduate students and include:

- 1) *A profile of who lives in SROs and who owns the hotels* by Aimee Friebourg. Her study synthesizes information about SROs from the Department of Planning, Department of Building Inspections, and Assessor's Office, as well as from a series of data matches using SRO addresses and administrative data from a range of city programs.
- 2) *A survey of SRO owners*, conducted by Michael Shen and William Leiter, about resident characteristics, vacancy rates, and the owners' willingness to partner with the city to better meet the human service needs of residents; and
- 3) *Interviews of SRO desk clerks in the Tenderloin*, also by Shen and Leiter, asking about the residents' characteristics, the operations of the hotel, and the nature of their jobs.
- 4) *Fiscal and policy issues related to SROs*, by the SF- HSA Planning Unit, drawing on public health cost information related to the use of city services by SRO residents, additional research articles, and summarizing some of the information from the other three studies in the context of existing San Francisco policies. This memo also contains additional rationale for the recommendations listed below.

Recommendations

As described by Ms. Friebourg, SRO residents outnumber people living in public housing developments, but have none of their advantages. The San Francisco Housing Authority (SFHA) has resident councils and makes decisions in public forums. Besides private security officers, SFHA has MOUs with the police department for community policing, and screens housing

applicants for felonies. It also has MOUs with non-profits and can apply for grants. Each family development has a Head Start program.

In contrast, private SROs are businesses and tenants are on their own. By housing such vulnerable populations, though, the SRO business model implicitly relies on expensive city-funded services. Though not organized like the Housing Authority to achieve specific outcomes, the city has an extensive economic relationship with privately owned SROs. By recognizing this relationship, San Francisco can create incentives to improve the lives of SRO residents and minimize their use of expensive city services. Elements of a broad strategy might include:

- ❖ ***Develop mutually beneficial partnerships with SRO owners.*** Too often the relationship between city government and SRO owners has focused on monitoring health and safety codes, which are non-negotiable, but which should not eclipse the possibility for partnerships between owners and city departments to improve the well-being of SRO tenants. For example, the city could develop loan programs or matching fund strategies that encourage SRO hotel owners to install bathroom grab bars and fix hazards, reducing the risk of hospitalization for large groups of seniors. One finding of the attached studies is that private SROs may have a large number of unwanted vacancies. Owners want their hotels to be fully occupied with stable tenants; the city wants to minimize costly services. These are mutually beneficial goals worthy of an explicit strategy.
- ❖ ***Develop desk clerks as professionals.*** One SRO owner who was interviewed noted that hotel staff seldom know how to approach persons with mental illness, much less recognize signs that a resident has stopped taking medication. Rather than calling crisis intervention, they call the police. An exemplary model for training desk clerks has been developed by the Community Housing Partnership, which covers such topics as “customer service, safety, emergency procedures, de-escalating conflicts, and setting boundaries.” At this time, however, the training is only used by community based organizations that manage hotels. On an ad hoc basis, the city directly rents about 300 “stabilization beds” in private SROs, as well as rooms for probation, treatment, and other purposes across departments. Yet it has no formal standards for desk clerks in those hotels where it rents rooms. The city should rent only in hotels with trained desk clerks. Nonprofit organizations that rent SRO rooms should abide by the same standard. With trained clerks, SROs would work with health and social service providers proactively and prevent the use of emergency services.
- ❖ ***Geographic caseloads.*** City caseworkers often have clients living in SROs, but their caseloads are not organized geographically. By concentrating SRO residents in a few caseloads, caseworkers can build knowledge about SROs, collaborate more readily across programs with other geographically assigned caseworkers, and build relationships with desk clerks and tenants that would result in earlier referrals of new clients and more proactive phone calls about existing clients who are struggling.
- ❖ ***Target outreach:*** The data matches that were conducted for the current studies can be used to identify which hotels have large concentrations of at-risk individuals – families, disabled persons, and seniors. With the owners’ cooperation, programs can provide efficient, targeted outreach that engages high-risk individuals in services like Healthy San Francisco that would mitigate the use of costly city services.

- ❖ **Organize CBO contracts strategically.** Many nonprofits are serving SRO residents, and most receive city funding. Rather than limiting itself to drop-in models of service delivery, the city can contract for services that target specific hotels where high risk individuals live, with an outcome measure that clients retain their housing. Even in the midst of a depressed budget cycle, San Francisco has program resources that can be reconfigured to keep SRO residents out of institutions, emergency care, and homeless shelters.
- ❖ **Fund more program beds.**¹ Given that SROs appear to have vacancies, the city should explore expanding the use of program beds to achieve specific interventions that would allow clients better odds at changing their lives. For example, SF-HSA could reserve program beds for homeless clients receiving SSI advocacy, ensuring that the clients are situated during the application process, and possibly be reimbursed for rent through the retroactive award of SSI.
- ❖ **Prioritize SRO families:** Until they can enter better housing, families in SROs need strategies that improve their current situation. For example, since such a high number of infants in SROs are referred to children's protective services, a wise prevention policy would specify that any child born to parents living in an SRO is assigned a public health nurse as a home visitor. To ensure that children spend as many hours as possible in enriched environments outside of SROs, the city should allow them to rise to the top of waiting lists for subsidized child care, early education, and after-school programs.
- ❖ **Incorporate SROs into city disaster planning:** SF-HSA recently responded to a fire in a Chinatown hotel without elevators and discovered a 91 year old person with a wheelchair and an oxygen bottle who was living on an upper floor. In the event of a large scale disaster, the city could be faced with hundreds of vulnerable persons living in environments that would be hard to evacuate them from or return them to. Furthermore, the 1989 Loma Preita earthquake increased the city's homeless population by damaging a large number of SRO hotels. San Francisco should consider the role of SRO hotels as it thinks about longer-term rebuilding challenges related to major disasters.

SROs are a valuable asset to San Francisco, housing vulnerable populations and acting as a safety valve on homelessness. Without a coordinated strategy for working with SROs, however, the city is missing an opportunity to reach large concentrations of persons who are at extreme risk to use expensive city services. In the next few weeks, SF-HSA will be organizing a forum of city departments to start a discussion of how to use the city's resources more strategically to meet the needs of SRO residents.

¹ A program bed is one rented by SF-HSA or another agency and provided to a client for program purposes. The client is not the building tenant and does not receive tenancy rights. If the client drops out of the program, he or she loses the unit. Once the client completes the program, however, he or she could be given the opportunity to assume tenancy in the unit.

ADVANCED POLICY ANALYSIS

San Francisco's Single-Room Occupancy (SRO) Hotels: A Strategic Assessment of Residents and Their Human Service Needs

**A Study Conducted for the San Francisco
Human Services Agency (SF-HSA),
San Francisco, California**

by

Aimée Fribourg

SPRING 2009

The author conducted this study as part of the program of professional education at the Goldman School of Public Policy, University of California at Berkeley. This paper is submitted in partial fulfillment of the course requirements for the Master of Public Policy degree. The judgments and conclusions are solely those of the author, and are not necessarily endorsed by the Goldman School of Public Policy, by the University of California or by any other agency.

Table of Contents

ACKNOWLEDGEMENTS	2
EXECUTIVE SUMMARY	3
1. INTRODUCTION	8
2. METHODOLOGY	9
2.1. QUANTITATIVE ANALYSIS	9
2.2. RECORDS REVIEW	10
2.3. QUALITATIVE RESEARCH	10
3. CONTEXT	11
3.1. SRO BUILDINGS AND RESIDENTS	11
3.2. HISTORY	11
3.3. SRO LIVING: ADVANTAGES AND OPPORTUNITIES	15
3.4. SRO LIVING: DISADVANTAGES AND CHALLENGES	16
3.5. SAN FRANCISCO'S SRO PROGRAMS AND POLICIES	16
3.6. NEIGHBORHOOD CHARACTERISTICS	20
3.7. KEY NEIGHBORHOODS	23
3.8. BUILDING PROPERTIES	27
3.9. MONTHLY RENT	31
3.10. OWNERS	32
3.11. PUBLIC HOUSING AND SECTION 8	33
4. MASTER PROFILE	38
4.1. METHODOLOGY	38
4.2. GENDER	39
4.3. AGE	41
4.4. ETHNICITY	44
4.5. LANGUAGE SPOKEN	45
4.6. CHANGE OVER TIME	45
5. SENIORS AND ADULTS WITH DISABILITIES	46
5.1. DATA SOURCES	46
5.2. FINDINGS	46
6. CHILDREN AND FAMILIES	54
6.1. DATA SOURCES	54
6.2. FINDINGS	54
7. PUBLIC SERVICE UTILIZATION	64
7.1. DATA SOURCES	64
7.2. FINDINGS	64
8. RECOMMENDATIONS	70
APPENDIX A: GLOSSARY OF TERMS AND ACRONYMS	73
APPENDIX B: ADDITIONAL DATA	76
MASTER PROFILE	76
ADULT PROTECTIVE SERVICES, 2008 CALENDAR YEAR	82
CALWIN, JANUARY 2009	84
CHILD WELFARE SERVICES, 2004-08 (INCLUSIVE)	88
DEPARTMENT OF PUBLIC HEALTH, CALENDAR YEAR 2008	91
IN-HOME SUPPORTIVE SERVICES, DECEMBER 2008	92

OFFICE ON THE AGING, JANUARY 2009	96
SAN FRANCISCO UNIFIED SCHOOL DISTRICT, APRIL 13, 2009.....	98
SUPPLEMENTAL SECURITY INCOME, JANUARY 2008	100
APPENDIX C: ADDITIONAL SRO NEIGHBORHOOD INFORMATION AND MAPS.....	101
NEIGHBORHOOD DEMOGRAPHICS	101
NEIGHBORHOOD QUALITY OF LIFE INDICATORS	101
SROs AND REALTOR NEIGHBORHOODS	102
SROs AND ZIP CODES	102
SROs AND SUPERVISORIAL DISTRICTS.....	103
REGISTERED SEX OFFENDERS AND FAMILIES WITH CHILDREN LIVING IN SROs IN SAN FRANCISCO	103
APPENDIX D: HSA SINGLE ADULT SUPPORTIVE HOUSING (SASH) AND DPH DIRECT ACCESS TO HOUSING (DAH) SITES	105
HSA SINGLE ADULT SUPPORTIVE HOUSING SITES	105
DPH DIRECT ACCESS TO HOUSING SITES.....	106
APPENDIX E: SAN FRANCISCO SRO HOTEL SAFETY AND STABILIZATION TASK FORCE	107
APPENDIX F: SERVICES CONNECTION PILOT PROJECT AND PROGRAM.....	108
APPENDIX G: KEY INFORMANT INTERVIEW PROTOCOL	109
APPENDIX H: SRO DEFINITIONS.....	110
APPENDIX I: SRO PRESERVATION EFFORTS AND SUPPORTIVE SRO PROGRAMS OUTSIDE SAN FRANCISCO	114
APPENDIX J: SELECTED PHOTOS	117
WORKS CITED	118

Acknowledgements

The process of gathering and synthesizing the information contained in this report would not have been possible without the continued support of Dan Kelly, HSA's Director of Planning, for working closely with me throughout this project; Noelle Simmons, HSA Deputy Director, for connecting me with numerous resources; Adam Nguyen, HSA Planning Unit, for his invaluable technical and moral support; all the members of HSA's Planning Unit: Gayathri Sundar, John Murray, Diana Jensen, Sarah Crow, and Candace Thomsen; and Trent Rhorer, HSA's Executive Director.

I would like to thank those individuals who contributed to this report by providing data and/or taking the time to speak with me: Rosemary Bosque, Jim Buick, Judy Chiang, Angela Chu, Jean Cooper, Tracy Dobronravova, September Jarrett, Deneen Jones, Jamie Lew, Janice Link, Maria Martinez, Mike McGinley, Teresa Ojeda, Johnson Ojo, Sam Patel, Alissa Pines, Michelle Rutherford, Luciana Tsay, Scott Walton, Hugh Wang, Cindy Ward, and Harry Williams.

I am also grateful to Larry Rosenthal and the members of my APA seminar for their feedback and encouragement throughout the semester.

Executive Summary

This report provides a profile of Single-Room Occupancy (SRO) hotel residents and their human service needs, drawing on caseload data from various city programs, key informant interviews, and administrative records reviews. Specifically, this study describes SRO residents through four distinct lenses: an overall “master profile”, seniors and adults with disabilities, children and families, and public service utilization.

The city of San Francisco is unable to meet residents’ demand for affordable housing. Many of the city’s most vulnerable populations, including families with children, seniors and adults with disabilities, and other public service recipients, are often at risk for homelessness. SROs account for a substantial portion of San Francisco’s affordable housing stock, as they provide housing for more low-income people than all the city’s public housing developments.

Most of San Francisco’s SRO hotels were built in the early decades of the 20th century. Most of these buildings have less than 40 units, and average monthly rents range from \$500 and \$600. These residential hotels are concentrated in four neighborhoods: the Tenderloin (208 buildings), Chinatown (145), South of Market (60), and Mission (50). While these neighborhoods differ across many dimensions, they all have lower median household incomes, higher proportions of residents in poverty, more racial and ethnic diversity, and higher unemployment rates than citywide measures.

An estimated 18,500 people live in the 530 buildings classified as SROs by the Planning Department. The city works closely with 46 of these hotels through the Human Service Agency (HSA)’s Single Adult Supportive Housing program, including Care Not Cash, and the Department of Public Health’s Direct Access to Housing program. Sixty-six are owned by non-profits. The remaining hotels represent opportunities for mutually beneficial partnerships between service providers and hotel owners.

I. Master Profile

The master profile is based on aggregated information from ten human service programs:

<ul style="list-style-type: none">• Adult Protective Services (APS)• California Work Opportunities and Responsibility to Kids (CalWORKS)• Cash Assistance Program for Immigrants (CAPI)• County Adult Assistance Programs (CAAP, or General Assistance)• Food Stamps	<ul style="list-style-type: none">• Foster Care• In-Home Supportive Services (IHSS)• Medi-Cal• Office on the Aging (OOA)• Supplemental Security Income (SSI)
--	--

These are all the programs for which Social Security Number was available, thus enabling the merging of caseload data into one master list of unduplicated individuals. While this dataset represents almost two-thirds of the estimated total number of SRO residents, it only includes those individuals connected with at least one of the ten above programs. People who receive other services or no services at all (e.g., those who are ineligible or not in need) are therefore

excluded. Nevertheless, this master profile is a good faith effort to capture as much information as possible about SRO residents. Key findings include:

- Most of the individuals in this dataset (57%) participate in only one of these ten programs.
- While males represent between two-thirds and three-fourths of SRO residents among African-Americans, Latinos, and Whites, they are the minority among Asian/Pacific Islanders (API) SRO residents.
- Close to half the individuals in the SRO resident master profile are API, just under one-fourth are White, and almost one-fifth are African-American.
- English is the primary language of more than half of these SRO residents; Chinese is the primary language of slightly over one-third.
- Younger SRO residents (under 18 years old) are mostly API and Latino. The API population also has the highest proportion of seniors living in SROs.

II. Seniors and Adults with Disabilities

The profile of seniors and adults with disabilities who live in SROs draws on caseload data from Adult Protective Services (APS), In-Home Supportive Services (IHSS),¹ Office On the Aging (OOA),² and Supplemental Security Income (SSI). Data and key informant interviews suggest that seniors and adults with disabilities who live in SROs are generally more socially isolated than their non-SRO-dwelling counterparts, and that they often need a broad range of comprehensive support services. Key findings include:

- Males account for the majority of SRO residents who receive SSI, IHSS, OOA, and APS services, while they represent minority of non-SRO program participants.
- In all four programs, SRO residents are significantly younger than non-SRO residents.
- With respect to ethnicity, almost half of all IHSS recipients in SROs are Asian/Pacific Islanders, while Whites make up over half of those with reports of abuse. Among SRO residents in all four programs, about one-fifth are African-American and a small percentage is Latino.
- SRO residents are generally less functionally limited than non-SRO residents, according to IHSS rankings.
- Compared to non-SRO residents who receive OOA services, SRO residents are more likely to be disabled or unemployed (as opposed to retired or employed), single or divorced (as opposed to married or widowed), and have veteran status.
- With respect to abuse, SRO residents involved with APS are more likely to be reported for “self-abuse”, while non-SRO residents are more likely to be reported for abuse by others.

¹ IHSS provides personal assistance services that allow low-income people with chronic and disabling conditions to remain in their homes.

² OOA contracts with community-based organizations to provide services for seniors and people with disabilities.

III. Children and Families

Findings about children and families who live in SROs are informed by individual-level data from the California Work Opportunities and Responsibility to Kids (CalWORKS), Child Welfare Services, First 5 San Francisco, and Subsidized Child Care; and neighborhood-level data from the Department of Public Health and the San Francisco Unified School District (SFUSD). SROs are generally far from ideal homes for children and families due to crowded conditions, lack of privacy, and often unsafe surroundings. Key findings include:

- Of the 910 SFUSD children living in SROs, over half are in Chinatown and close to one-third are in the Tenderloin.
- Over half of the SFUSD children who live in SROs are Chinese and almost one-fifth are Latino. The data suggest that many of these children are immigrants—over two-thirds of children living in SROs are in Chinatown and the Mission, and half of those in the Tenderloin, have English Language Learner status.
- With respect to public health services used by children who live in SROs, those in Chinatown's SROs made the greatest number of primary health care visits in 2008 and those in the Tenderloin's SROs account for the most Emergency Department and inpatient service visits. Children in those two neighborhoods also represent the bulk of mental health service clients among SRO residents.
- Children who live in SROs display a higher substantiation rate for child abuse reports than non-SRO residents, although the total number of child welfare referrals made for SRO residents decreased by about one-third between 2005 and 2008.

IV. Public Service Utilization

This profile uses individual-level data from the Food Stamps program, County Adult Assistance Programs (CAAP, or General Assistance), and Medi-Cal; and neighborhood-level data from the Department of Public Health. Key findings include:

- Among SRO residents, males make up just over half of Medi-Cal recipients, about two-thirds of Food Stamps recipients, and over three-fourths of CAAP beneficiaries.
- The mean and median ages for Medi-Cal, Food Stamps, and CAAP recipients who live in SROs range from 43 to 55 years.
- Ethnicity varies across programs. African-Americans and Whites each make up slightly over one-third of CAAP recipients who live in SROs; Food Stamps recipients who live in SROs are relatively evenly distributed among African-Americans, Asian/Pacific Islanders, and Whites; almost two-thirds of Medi-Cal recipients who live in SROs are Asian/Pacific Islanders.
- English is the primary language of the overwhelming majority of CAAP and Food Stamps recipients who live in SROs, while Chinese is the primary language of just over half of SRO residents with Medi-Cal.
- Among all SRO residents, those in the Tenderloin used the largest portion of medical, mental health, and substance abuse services in 2008.

Recommendations

1. Develop and use criteria to target specific SROs and populations of SRO residents for outreach.

The data suggest that many SRO residents may not be taking full advantage of services for which they are eligible. Moreover, many private SRO owners have a strong interest in addressing tenants' needs, especially when they interfere with hotel operations (e.g., mental illness, substance abuse, hoarding and cluttering, criminal activities).³ Potential criteria for targeted outreach include:

- a. Supplemental Security Income (SSI) recipients who do not receive In-Home Supportive Services (IHSS). This study found that, while all SSI recipients are income-eligible for IHSS and many would likely benefit from caretaker services, just under one-third of SSI recipients living in SROs also receive IHSS.
- b. SFUSD children with free/reduced lunch who do not receive Food Stamps. This study found that the number of children living in SROs who receive Food Stamps is less than half the number of children in SROs who receive free/reduced lunch. While some of these children may be ineligible (e.g., due to immigration status), those who do qualify would likely benefit from additional nutritional support.
- c. Concentrations of Personal Assisted Employment Services (PAES) recipients, especially in the Tenderloin. PAES recipients are employable adults, and SRO residents who receive PAES should be targeted by HSA's Boyd Hotel Workforce Development Center in the Tenderloin, which offers services for formerly homeless individuals living in supportive housing units.
- d. Concentrations of seniors and adults with disabilities, considering the Services Connection Program as a model. This program is a collaboration between DAAS, the San Francisco Housing Authority, resource centers, and community-based service providers.
- e. Concentrations of children and families. Target hotels with the greatest number of children and families for on-site services such as outreach for benefit screening, after-school activities, and exit strategies.

2. Preserve SROs as affordable housing stock in San Francisco.

While new construction may take years, San Francisco's SROs already house more low-income people than the city's public housing developments. Strategies such as master leasing can be mutually beneficial to owners, service providers, and residents. Owners benefit from a guaranteed income stream, service providers are able to offer on-site support and, according to the San Francisco Planning Department, "the transfer of residential hotels to effective non-profit housing organizations...ensure[s] permanent affordability, livability, and maintenance."⁴

3. Bring key stakeholders together to strategize about how to better serve low-income SRO residents.

Establishing partnerships that promote information-sharing between city departments,

³ Conversation with Sam Patel, president of the San Francisco Independent Hotel Owners and Operators Association, on 5/7/09.

⁴ San Francisco General Plan: Housing Element (2004)

community-based organizations, and hotel owners and residents will increase efficiency by fostering collaborative service delivery. For example:

- a. San Francisco Police Department. While some private SRO owners already work closely with local police,⁵ formalizing these partnerships would grant owners more direct access to police services and allow police officers to better protect and serve the community.
- b. Human Services Agency (HSA) and community-based service providers. Establishing partnerships with human service providers would equip hotel owners with information about available services and more direct access to providers. Moreover, the HSA and community-based providers would have the opportunity to expand their client base.
- c. SRO Commission and/or Resident Councils. Creating a formal setting in which tenants may voice their concerns and communicate with hotel owners and property managers would help foster increased understanding and cooperation.

4. Monitor changes in the SRO resident profile over time.

San Francisco's SRO population is constantly shifting, and the HSA and other service providers should identify changing trends in SRO residents' demographics and human service needs. Monitoring changes in the SRO population will help ensure the provision of appropriate services based on clients' needs. This report may be used as a baseline against which to measure change.

⁵ Conversation with Sam Patel, president of the San Francisco Independent Hotel Owners and Operators Association, 5/7/09.

1. Introduction

This is the San Francisco Human Service Agency (HSA)'s first comprehensive assessment of the city's SRO residents and their human service needs. An evidence-based understanding of the city's SRO residents is crucial in order to determine whether they differ significantly from comparable non-SRO populations, whether they merit differential treatment, and how to most effectively reach them and address their needs.

Section 2 of this report contains a brief explanation of the research methods used.

Section 3 provides contextual information about SRO buildings and residents, outlines the history of San Francisco's SROs, discusses several advantages and drawbacks of SRO living, and reviews relevant citywide programs and policies. It also contains descriptions of the four neighborhoods in which most SROs are located and additional information about building characteristics, monthly rents, and SRO owners. Following that is a brief discussion of public housing developments, as they represent the primary housing alternative for low-income San Francisco residents who might otherwise live in SROs.

Sections 4 through 7 of this report describe SRO residents through four distinct lenses: an overall "master profile", seniors and adults with disabilities, children and families, and public service utilization. Each SRO resident profile includes findings about characteristics such as gender, age, ethnicity, and language spoken, as well as various additional descriptors.

Section 8 offers recommendations for future action.

2. Methodology

2.1. Quantitative Analysis

This report uses caseload data from various city programs in order to generate descriptive information about SRO residents (see Table 1). Within each set of caseload data, only those individuals with San Francisco addresses were retained. Data cleaning involved eliminating duplicate records when appropriate, fixing typographical errors (e.g., misspellings or non-standardized street names), and separating the street number and street name into two separate fields. Addresses from caseload data were matched against the 530 SRO addresses, and those individuals with matching addresses were flagged as SRO residents. All other individuals were labeled non-SRO residents. **Primary data sources** are those that include social security number and, when aggregated into one large dataset, produce this report's master profile of SRO residents. **Additional data sources** are those that do not include social security number and/or were obtained as aggregated information.

PRIMARY DATA SOURCES (FOR MASTER PROFILE)			
Data Source	Date of Extract	Number of Individuals	Percentage that are SRO Residents
1. Adult Protective Services (APS)	Calendar Year 2008	3,807	16.39%
2. California Work Opportunity and Responsibility to Kids Information Network (CalWIN) (comprises eight programs)	January 2009 (and December 2006)	104,029 (2009) 99,120 (2006)	6.23% (2009) 6.45% (2006)
3. In-Home Supportive Services (IHSS)	December 2008	20,754	11.44%
4. Office on the Aging (OOA)	January 2009	14,728	7.90%
5. Supplemental Security Income (SSI)	January 2008	48,994	11.75%
ADDITIONAL DATA SOURCES			
Data Source	Date of Extract	Number of Individuals	Percentage that are SRO Residents
1. Child Welfare Services Case Management System (CWS CMS)	2004 - 2008	28,669 (referrals)	2.28%
2. First 5 San Francisco	Academic Year 2008-2009	3,723	≤ 0.81%
3. Department of Public Health: Medical, Mental Health, and Substance Abuse Services	2008 Calendar Year	varies by type of service	unknown
4. San Francisco Unified School District	April 13, 2009	unknown	(910 children)
5. Subsidized Child Care (from Children's Council)	March 11, 2009	3,558 families 1,824 providers	0.82% of families 1.43% of providers

Table 1. Primary and Additional Data Sources.

2.2. Records Review

This study uses building-level information about SROs from the following sources:

- Planning Department
- Department of Building Inspections (DBI)
- Office of the Assessor-Recorder

2.3. Qualitative Research

One focus group and numerous interviews were conducted with individuals from public and community-based organizations that interface with SRO residents. Interviews used a uniform protocol for consistency.⁶

City Programs and Services

- Care Not Cash, Housing and Homeless Programs, HSA (Deputy Director)
- Community Programs, DPH (Deputy Director)
- In-Home Supportive Services (Hospital Discharge Liaison and Senior Social Worker)
- Policy and Planning, Department of Children Youth and Families (Director)
- Temporary Rental Subsidy Program, Family Programs, Housing and Homeless Division, HSA (Manager)

Community-Based Organizations

- Chinatown Community Development Center (Community Organizing Manager)
- Curry Senior Center (Case Management Supervisor)
- Glide Foundation (Director of Community Building, Walk-In Case Manager, and Health Services Case Manager)
- Self-Help for the Elderly (Home Care & Hospice Administrator and Home Care Occupational Therapist)

⁶ See Appendix G for key informant questionnaire.

3. Context

3.1. SRO Buildings and Residents

In different contexts, an SRO unit may be a studio apartment or a room, with or without a private bath, with or without a kitchen, with or without food preparation permitted in the unit or in a common kitchen on the premises.⁷ Some SROs mix revenues from the lower discount rates that residents and tourists pay with occasional income from guests who pay higher prices for shorter stays.

Because this report relies largely on building-level data provided by San Francisco's Planning Department, it uses their definition of SRO units:

"SEC. 890.88. RESIDENTIAL USE.

A use which provides housing for San Francisco residents, rather than visitors...

(c) Single Room Occupancy (SRO) Unit. A dwelling unit or group housing room consisting of no more than one occupied room with a maximum gross floor area of 350 square feet and meeting the Housing Code's minimum floor area standards. The unit may have a bathroom in addition to the occupied room...

A single room occupancy building (or "SRO" building) is one that contains one or more SRO units and no nonaccessory living space.

(Added by Ord. 131-87, App. 4/24/87; amended by Ord. 368-94, App. 11/4/94)."

According to a 2006 U.S. Census Bureau report about people who live in hotels, SRO inhabitants are largely single locals of the city and its surrounding suburbs taking advantage of low rates.⁸ In San Francisco, a person who has lived in an SRO hotel continuously for 32 days or more is considered to be an SRO hotel resident.⁹

3.2. History

Early 20th Century: SRO Expansion

According to historian Paul Groth, residential hotels were "an integral part of the casual labor supply and its culture" in the early 20th century.¹⁰ As early as the 1890s, unskilled day laborers began coming to San Francisco in search of work. They were mostly men with few belongings and no family attachments who had a reputation for drinking, working intermittently, and traveling often.¹¹ Due to the low wages they earned, their own subculture, and the fact that they were not welcome in most of the city despite the importance of their labor to the local economy, these casual laborers often stayed downtown in lodging houses.¹²

⁷ Brownrigg (2006). See Appendix H for a discussion of different definitions.

⁸ Brownrigg (2006)

⁹ Different jurisdictions have varying classifications of SRO residents, tenants, and transients.

¹⁰ Groth (1994)

¹¹ Groth (1994)

¹² Groth (1994)

In the 1920 census, San Francisco registered over 17,000 general laborers and an additional 7,000 longshoremen and sailors.¹³ A significant proportion of San Francisco’s casual labor market and lodging house residents comprised new immigrants and racial minorities, especially Chinese and Japanese workers. A small number of women and families also lived in these lodging houses.

Rising employment due to World War II production began in 1939, increasing the demand for hotel housing in San Francisco. Many workers resided in emergency dormitory and barracks-style housing modeled on traditional lodging and rooming houses.¹⁴ The post-war rooming house market continued to thrive with the influx of single young men and women. These residential hotels also housed college and technical school students, whose numbers grew in the 1940s and 1950s.

1960s: SRO Residents’ Changing Profile

In the 1960s, the profile of San Francisco’s residential hotel tenants began to shift. Downtown, the demand for unskilled labor began to diminish as workshop employers and shipping firms moved to outlying suburbs, the cargo port lost traffic to more modern ports, and still other jobs were eliminated through mechanization. As Groth notes, “By 1960, welfare departments were sending more unemployed downtown people—especially the elderly—to hotels for temporary housing that tended to become permanent.”¹⁵ He goes on to describe the influx of former mental hospital patients into SRO hotels: “In the mid-1960s, the well-intentioned (and budget-cutting) decision...to mainstream mental hospital populations had been coupled with promises of halfway houses and group homes...However, the halfway houses were never established. Patients were essentially dumped into downtown hotels where neither hotel staff nor residents were prepared for the care required by these new neighbors.”¹⁶

Post-1960s: SRO Stock Loss

Between World War II and 1960, a generation of hotel owners died and many of their inheritors sold those properties in favor of suburban real estate investments. Urban renewal put additional pressure on San Francisco’s residential hotels in the 1960s, as coalition of retailers and real estate developers strove to accommodate the increased demand for office space downtown. The need to connect surrounding suburban areas with the rebuilt downtown resulted in the demolition of thousands of hotel rooms in order to make way for highways and viaduct routes. As Groth puts it, “urban renewal was also a period of hotel resident removal.”¹⁷

Since hotels were not officially considered to be permanent housing, the people who lived in hotels were not seen as “residents.” Consequently, when SRO buildings were demolished during the massive downtown clearances that occurred between 1950 and 1970, “no one” had been moved, and no dwelling units were lost in official counts and newspaper reports.¹⁸

¹³ Groth (1994)

¹⁴ Groth (1994)

¹⁵ Groth (1994)

¹⁶ Groth (1994)

¹⁷ Groth (1994)

¹⁸ Groth (1994)

Between 1975 and 1988, San Francisco lost 43% of its low-cost residential hotels.¹⁹ An estimated one million SRO units across the nation were demolished between 1970 and the mid-1980s.²⁰ Examples from other cities include:

- Chicago’s “cubicle hotels”²¹ were “totally eliminated” by 1982²²
- Denver lost 64% of its SRO hotels between 1971 and 1981²³
- Los Angeles lost more than half of its downtown SROs by 1985²⁴
- New York City lost 87% of its SRO stock renting at \$200 a month or less between 1970 and 1982²⁵
- Portland, Oregon lost 59% of its residential hotels from 1970 to 1986²⁶
- In Seattle, demolition and urban redevelopment claimed most “skid row” hotels; by 1998, only four were left²⁷

Current Situation: SRO Preservation

Recently, there has been growing interest in protecting and preserving SROs. Following the widespread demolition and degradation of these hotels, several jurisdictions passed laws to protect or remodel their remaining stock of SRO units.²⁸ Various retention programs in San Francisco have slowed the rate of SRO loss from the late 1970s, when the city lost almost 700 units per year.²⁹ Nevertheless, many of San Francisco’s SROs have been converted to permanent or seasonal tourist uses, which tend to be more lucrative. Others are used as family housing, dormitories, or efficiency apartments for nearby educational institutions. Still others were demolished and replaced with buildings for entirely different uses. Between 1981 and 1997, fires eliminated at least 684 low cost SRO hotels in San Francisco.³⁰ A net loss of 392 residential hotel rooms was recorded citywide between 1996 and 2002.³¹ Between 1999 and 2004, San Francisco lost approximately 700 SRO units to fire, earthquake damage, or other types of conversion.³²

San Francisco’s 10-Year Plan to End Homelessness, released in 2004, set a goal of 3,000 housing units for the “chronic homeless” While new construction may take years, SROs are often overlooked as affordable housing stock. Individual/SRO housing made up the smallest proportion of new affordable housing construction in 2007 (see Table 2):

¹⁹ Wright (1997)

²⁰ Dolbeare (1996)

²¹ Type of hotel in which tenants pay for a small cubicle as opposed to a private room. See Appendix A for detailed definition.

²² Koegel (1996)

²³ Wright (1997)

²⁴ Koegel (1996)

²⁵ Koegel (1996)

²⁶ Wright (1997)

²⁷ McKnight (2002)

²⁸ Brownrigg (2006). See Appendix I for examples of other cities’ efforts to preserve SRO stock.

²⁹ San Francisco General Plan: Housing Element (2004)

³⁰ Cell (1998). In August 2001, the Board of Supervisors passed the Residential Hotel Sprinkler Ordinance, requiring the installation of automatic sprinkler systems in all residential hotels by December 31, 2002.

³¹ San Francisco General Plan: Housing Element (2004)

³² San Francisco General Plan: Housing Element (2004)

Year	Family	Senior	Individual / SRO	Homeowner	Total
2003	126	50	98	85	359
2004	354	25	0	169	548
2005	228	226	235	110	799
2006	260	0	56	175	491
2007	154	258	120	203	735
Total (2003-2007)	1,122	559	509	742	2,932
% of Total, 2003-2007	38%	19%	17%	25%	100%

Table 2. New Affordable Housing Construction by Housing Type, 2003-2007

Source: San Francisco Housing Inventory 2007

Notes: Family units include projects with a majority of two or more bedroom units. Individual / SRO includes projects with a majority of studios or one bedroom, residential care facilities, shelters, and transitional housing.

In recent years, the general trend among residential hotels is toward a decreasing supply of *for-profit* residential hotels and residential rooms in these hotels, and a concurrent increase in the number of *non-profit* residential hotels and rooms. Table 3 shows the changes in residential housing stock between 2001 and 2005.

Year	For-Profit Residential Hotels			Non-Profit Residential Hotels		Total Residential Rooms	
	Number of Buildings	Residential Rooms	Tourist Rooms	Number of Buildings	Residential Rooms	Number of Buildings	Residential Rooms
2000	457	16,331	3,781	61	3,314	518	19,645
2001	460	16,031	4,084	61	3,482	521	19,513
2002	457	15,902	3,846	61	3,473	518	19,375
2003	457	15,878	3,520	62	3,495	519	19,373
2004	455	15,767	3,239	65	3,652	520	19,419
2005	435	15,106	3,345	71	4,217	506	19,323
Overall, 2000-2005	-22	-1,225	-436	10	903	-12	-322

Table 3. Changes in Residential Hotel Stock, 2001-2005.

Source: San Francisco Housing Inventory 2005

The increasing number of residential hotel buildings owned and/or managed by non-profits helps ensure their long-term affordability.³³ Sixty-six of the city's 530 SROs, or 12.5% of the total, are run by nonprofits.³⁴ Figure 1 indicates the location of San Francisco's 530 SROs.

³³ San Francisco General Plan: Housing Element (2004)

³⁴ Data source: San Francisco Planning Department.

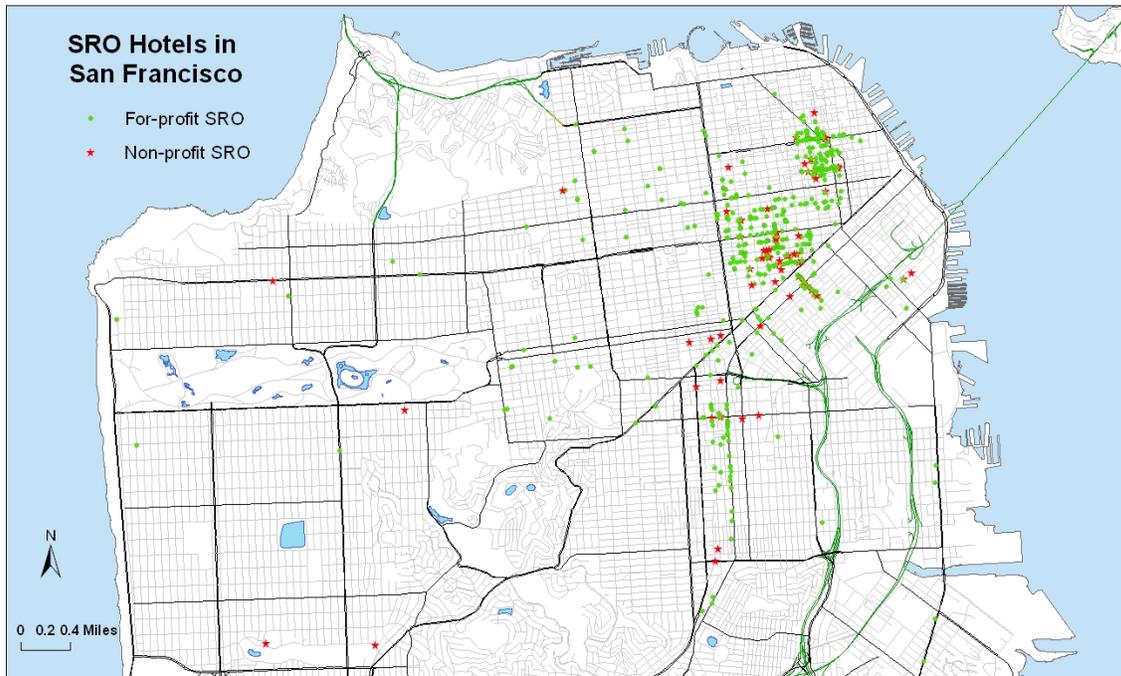


Figure 1. For-profit and non-profit SROs in San Francisco.

Non-profit involvement in SROs includes those hotels that are master-leased by the San Francisco Human Services Agency (SF-HSA) for its Single Adult Supportive Housing program, including Care Not Cash, and by the Department of Public Health (DPH) for its Direct Access to Housing (DAH) program. For-profit, privately-owned SROs may also contain some DPH “stabilization rooms” where formerly homeless individuals can stay temporarily while they receive help searching for permanent housing.³⁵

3.3. SRO Living: Advantages and Opportunities

Social Network

Dense urban living and communal living, including in SROs, offer several potential benefits. SRO residents can build a social network for each other. Some buildings may have sense of community and foster information-sharing among residents. Other homeless populations, including those who stay in temporary shelters, may be more socially isolated.

Support Services

According to several interviewees who work with this population, SRO residents are often aware of available support services and programs (e.g., public assistance, free meal sites, low-cost dining halls, medical clinics, detoxification programs) as a consequence of information-sharing among residents, physical proximity to these services and, in some cases, onsite case management. Dense concentrations of SRO residents with similar needs offer “economies of scale” for service providers. Some interviewees noted that, if there is a case manager on site, living in an SRO can be better for seniors than other group housing situations that do not offer onsite support.

³⁵ See Section 3.5 for detailed explanations of these and other programs.

An SRO Is a Home

San Francisco is unique in having the amount of SRO housing stock that it has. For a subset of SRO residents, the only alternatives may be living the street or in a temporary shelter. Although an SRO is not an ideal home, it is nonetheless a home with some degree of stability and often inexpensive rent.

3.4. SRO Living: Disadvantages and Challenges

Crowded Conditions

SRO rooms have very limited space and the buildings, with communal kitchens and bathrooms, generally lack privacy. While some rooms are occupied by single individuals, there are reports of up to two generations families in one room. Crowded conditions can be especially problematic for families and residents with mental health issues.

Social Isolation and Vulnerability

Although some SROs are said to foster a sense of community, many SRO residents can be socially isolated. These hotels were not originally designed to build community and consequently do not usually have any communal space. One interviewee explained that “there is no living room, so residents go hang out on Market Street.” Some residents may have no friends, no family, and/or no telephone. Many have scarce or limited support systems, especially when there are no on-site case managers. Interviewees noted that some SRO residents may behave as if they were homeless by spending all day outside, often in unsafe environments, and coming home only to sleep. Seniors and immigrants who live in SROs are also said to be particularly vulnerable target populations for scams.

Lack of Alternatives

According to several key informants, while residents usually want to move out of SROs, they often do not want to leave their neighborhoods. In addition, some SRO tenants may be ineligible for public services due to income restrictions yet remain unable to pay for private services.

Low Service Uptake

History and qualitative research indicate that, compared to apartment dwellers, SRO residents tend to be more transient. One service provider noted that a small but significant subset is unstably housed due to substance abuse or other risk factors. Still others are simply not attached to any city services—these “off-the-grid” or “shadow” groups include undocumented immigrants, people who have timed out on aid, and those with criminal histories or mental health issues. Finally, according to several interviewees, not all SRO residents are willing to accept services for a variety of reasons (e.g., immigration status concerns, fear of the government, uncertainty about how the system works).

3.5. San Francisco’s SRO Programs and Policies

In recent decades, San Francisco has developed numerous programs and policies that aim to preserve SROs as affordable housing and support SRO residents, owners, and service providers.

The Residential Hotel Ordinance. The Residential Hotel Ordinance, administered by the Department of Building Inspection (DBI)’s Housing Inspection Services Division, was originally adopted in 1980. This ordinance regulates and protects the existing stock of

residential hotels by requiring permits for conversion of residential hotel rooms to commercial use, imposing a strong replacement provision, and mandating that 80% of the replacement cost be provided to the City in the case of conversion or demolition. Measures to strengthen the enforcement of the program were incorporated in 1990, significantly decreasing the annual loss of SRO units in the City.

*The Single Room Occupancy Hotel Safety and Stabilization Task Force.*³⁶ Established in 2001, San Francisco's SRO Hotel Safety and Stabilization Task Force's mission is "to monitor, develop and present recommendations to the Mayor and Board of Supervisors regarding policies and procedures around fire prevention, investigations and prosecution of SRO violators, and stabilization of hotel tenants and residents."³⁷ The SRO Task Force is also charged with producing a comprehensive annual report.

Planning Department. San Francisco's Planning Department recognizes SROs as "unique and often irreplaceable resource for thousands of lower income elderly, disabled, and single-person households."³⁸ In 2004, the Planning Department's Housing Element General Plan included two policies directly related to SROs:

1. *Preserve the existing stock of residential hotels.* The Planning Department recommended that those hotels located in predominantly residential areas be protected by zoning that does not permit commercial or tourist use. In non-residential areas, they assert that conversion of units to other uses should either not be permitted or only be permitted where a residential unit will be replaced with a comparable unit elsewhere. The plan also states that hotels that operate as mixed tourist/residential hotels should be subject to strict enforcement to ensure the availability of the hotel for permanent residential occupancy. Finally, the report recommends that the City facilitate the purchase and master lease of residential hotels by "effective non-profit housing organizations" in order to ensure permanent affordability, livability, and maintenance.³⁹
2. *Encourage the construction of affordable units for single households in residential hotels and "efficiency" units.* In 1995, the City adopted a set of development standards for residential hotel construction. These SRO Design Guidelines focused on strategies to ensure neighborhood compatibility, affordability levels, and adequate life safety for SRO development. This report recommends that appropriate sites and sponsors for both market rate and affordable residential hotels should be developed. In order to achieve this, the Planning Department set out to identify appropriate sites and sponsors for affordable residential hotels in collaboration with the Mayor's Office of Housing and the Redevelopment agency. The City also requires that qualified property management companies be responsible for operating newly constructed SROs so that the facilities and associated services will be properly maintained and suitable for occupancy in the future. Finally, in order to get communities on board, the City encourages affordable housing advocacy groups to hold project specific

³⁶ See Appendix E for a description of the Task Force's membership and goals.

³⁷ SFGov Website, http://www.sfgov.org/site/sro_index.asp

³⁸ San Francisco General Plan: Housing Element (2004)

³⁹ San Francisco General Plan: Housing Element (2004)

neighborhood acceptance community meetings when SRO housing developments are proposed in “particular neighborhoods.”⁴⁰

Direct Access to Housing (DAH). San Francisco’s Department of Public Health (DPH) established DAH in 1998 to provide permanent housing with on-site supportive services for approximately 400 formerly homeless adults, most of whom have concurrent mental health, substance abuse, and chronic medical conditions. This program provides 370 units of permanent supportive housing in five SROs that were acquired through master leasing.⁴¹ The key components of master leasing are:⁴²

- Identify privately-owned buildings that are vacant or nearly vacant and whose owners are interested in entering a long-term lease in which the owner retains responsibility only for large capital improvements.
- Negotiate improvements to the residential and common areas of the building prior to executing the lease. The owner is responsible for building improvements in compliance with all health and safety codes, with all rooms fully furnished prior to occupancy.
- Contract with community-based organizations to provide on-site support services and property management. Most DAH buildings include a collaborative of two or more entities.⁴³

Care Not Cash. In 2004, a voter referendum caused San Francisco to abandon the “Continuum of Care” strategy that graduated the formerly homeless from shelters to transitional housing to permanent housing. In its place, the City adopted the “Housing First” model, which emphasizes “immediate placement of the individual in permanent supportive housing, and then provides the services, on site, necessary to stabilize the individual and keep them housed.”⁴⁴ The HSA began implementing the Care Not Cash initiative, a plan that Mayor Gavin Newsom claimed would end chronic homelessness in ten years, on May 3rd, 2004.

Care Not Cash targets homeless people who receive cash assistance from San Francisco’s County Adult Assistance Program (CAAP), a cash aid program for adults without dependent children, and people in emergency shelters. Under this program, homeless CAAP recipients are offered housing/shelter and other amenities as a portion of their benefit package. Care Not Cash reduced welfare payments for the homeless by 86%, using the savings to expand permanent housing and increased services, including access to mental health, substance abuse, and other support services. In order to execute this plan, the city master leased several former commercial SRO hotels, targeting larger hotels (i.e., those with more than eighty units). As of 2006, the HSA was contracting with 17 SRO buildings to provide a total of 1,321 units⁴⁵.

⁴⁰ San Francisco General Plan: Housing Element (2004)

⁴¹ An additional 33 units are located in a licensed residential care facility.

⁴² “Local Implementation of 10 Year Plans to End Homelessness”, 7.11.05 NAEH Conference, HomeBase/Legal and Technical Services Supporting Shared Property—Training Institute

⁴³ Service providers include Episcopal Community Services; Baker Places, Inc.; Tenderloin AIDS; Lutheran Social Services; Page St. Guest House; and Richmond Area Multiservices.

⁴⁴ The San Francisco Plan to Abolish Chronic Homelessness, 2004 (<http://sfgov.org/site/uploadedfiles/planningcouncil/news/TheSFPlanFinal.pdf>)

⁴⁵ Tipton (2008)

Temporary Rental Subsidy Program. This program, operated by the HSA's Division of Housing and Homeless Programs, aims to help families who live in SROs, shelters, or other overcrowded conditions out of their current living situation. Recipients must demonstrate a viable plan for self-sufficiency within 12-24 months. Although no citizenship documentation is required, immigrant status can be a barrier to achieving self-sufficiency, as can lack of experience, work history, and education.

Stabilization Rooms. The San Francisco Homeless Outreach Team (SF HOT) was established in June 2004 with the goal of engaging chronically homeless individuals in services to get them off the streets and into stabilized situations. SF HOT operates “stabilization rooms” in private SROs, mostly in the Tenderloin, where clients may stay temporarily while searching for permanent housing.

Definition of Homelessness. In December 2001, the board of Supervisors and the Mayor expanded the Definition of Homelessness to include families with children who live in SROs, as recommended by the SRO Task Force. This made services that had previously only been open to individuals living on the street or in shelters available to families in SROs. The Families in SROs Collaborative engages in outreach activities to inform potential beneficiaries about these services.

Tenancy Rights. SRO dwellers gain tenancy rights as legal "permanent residents" after a continuous stay of 30 days under state law, or 32 days under city law.⁴⁶ In the past, some San Francisco SRO hotel managers were reported to evict tenants every few weeks to prevent them from establishing tenants' rights, a practice sometimes referred to as “musical rooms.” The City Attorney has sued the proprietors of several SROs for engaging in this practice.⁴⁷

Safety regulations. Since 1999, safety code violations have displaced hundreds of SRO residents.⁴⁸ The City Attorney has sued several SROs to bring them up to code.⁴⁹ A significant number of units found to have violations were subsequently converted to other types of permanently affordable housing.⁵⁰ The DBI and SF Fire Department are required to conduct annual inspections to regulate SRO building safety.⁵¹

Hoarding and Cluttering. The San Francisco Task Force on Compulsive Hoarding began in June 2007 and is co-chaired by the Mental Health Association of San Francisco and DAAS. They define “compulsive hoarding” as:

- The acquisition of, and failure to discard possessions that appear to be useless or of limited value
- Living spaces sufficiently cluttered so as to preclude activities for which those spaces were designed

⁴⁶ Cell (1998)

⁴⁷ the Drake Hotel, Hotel West, Edgewater Hotel, the (new) Minna Lee, and the Alder; source: Cell (1998)

⁴⁸San Francisco General Plan: Housing Element (2004)

⁴⁹ the Hotel Alder, the Henry, the Elm, and the Alkain; source: Cell (1998)

⁵⁰San Francisco General Plan: Housing Element (2004)

⁵¹ San Francisco General Plan: Housing Element (2004)

- Significant distress or impairment in functioning caused by the hoarding⁵²

Hoarding and cluttering are common problems among SRO residents. This Task Force works to identify gaps and barriers in services, assess current services and needs, identify best practices, raise awareness among the public and policymakers, and make policy recommendations.

3.6. Neighborhood Characteristics

San Francisco’s SROs are concentrated in four neighborhoods that contain 463 of its 530 SROs (87% of the total). This report uses the Planning Department’s neighborhood definitions as a basis for delineating these four neighborhoods:

Neighborhood	Refers to Planning Department’s Neighborhood(s)
“Chinatown”	Chinatown, Financial District, North Beach, Russian Hill
“Mission”	Mission
“South of Market”	South of Market
“Tenderloin”	Downtown/Civic Center, Nob Hill

Table 4. Neighborhood Definitions.

The above definitions of Chinatown and the Tenderloin reflect the areas that many service providers and residents commonly refer to as such.

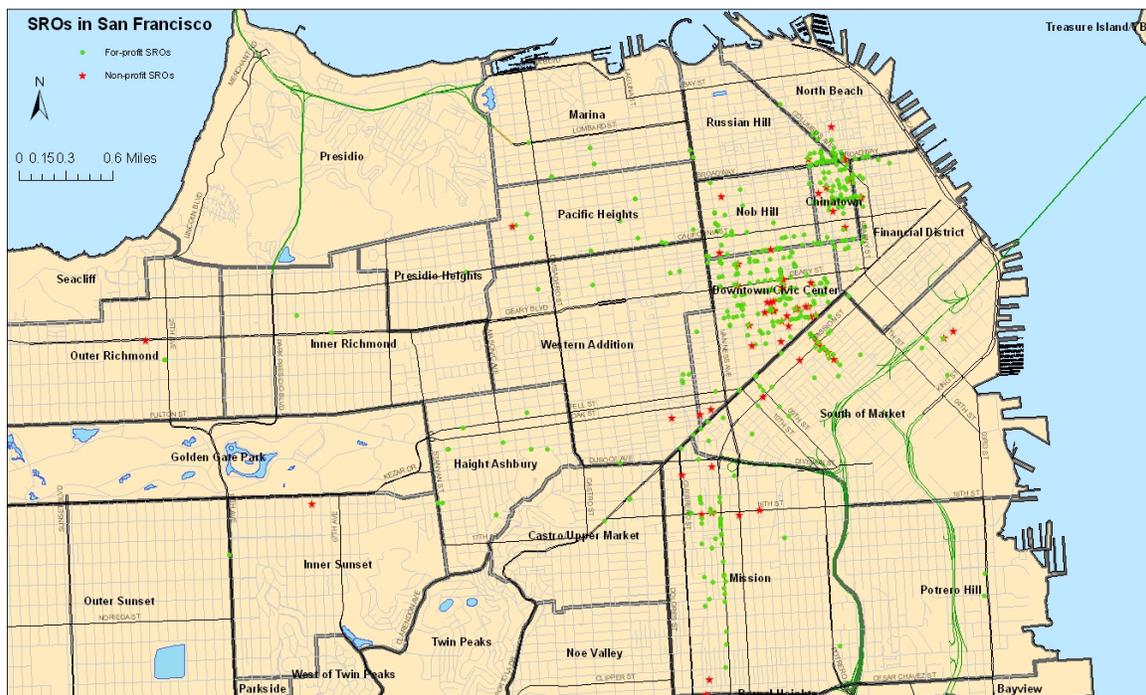


Figure 2. SROs in San Francisco and Planning Department Neighborhoods.⁵³

⁵² From “MHA-SF’s Institute on Compulsive Hoarding and Cluttering, HSA Management Retreat 4/26/08”; Citation: Frost and Hartl (1996)

The Tenderloin contains the largest number of SROs (208), followed by Chinatown (145). South of Market and the Mission also have a substantial number of SROs (60 and 50, respectively), and the remaining 67 are scattered throughout the city. Table 5 enumerates the number of SROs, the number of total and occupied residential units, the occupancy rates, and the estimated number of residents in each neighborhood and overall.

Neighborhood	Number of SROs	Number of residential units	Number of occupied residential units	Occupancy rate	Number of residents (estimated ⁵⁴)
Tenderloin	208	8,616	6,064	70.38%	7,731
Chinatown	145	5,464	4,404	80.60%	5,615
South of Market	60	2,522	1,860	73.75%	2,371
Mission	50	1,764	1,246	70.63%	1,589
Other	67	1,647	971	58.96%	1,238
Total	530	20,013	14,545	72.68%	18,543

Table 5. SROs, SRO Units, Occupancy Rates, and Estimated SRO Residents by Neighborhood.
Source: Planning Department

The four neighborhoods in which SROs are concentrated differ across many dimensions, and each has a distinct set of strengths, needs, and characteristics.

Demographics

Compared to citywide averages, these neighborhoods' residents have lower median household incomes, higher proportions living in poverty, more racial and ethnic diversity, and higher unemployment rates (see Table 6).⁵⁵

Demographic Indicator	Tenderloin	Chinatown	South of Market	Mission	Citywide
Weighted median household income	\$41,649	\$43,170	\$43,195	\$61,817	\$71,451
Proportion living below the poverty level	18%	17%	23%	17%	11%
Diversity index score (0-100) ⁵⁶	59.5	45.75	68	79	58

⁵³ See Figures 3 through 6 below for neighborhood-specific maps, and Appendix C for maps with Realtor Neighborhoods, Zip Codes, and Supervisorial Districts.

⁵⁴ Estimated using average occupancy rate for zero-bedroom apartments in San Francisco, 2005-2007, according to ACS data (source: IPUMS)

⁵⁵ See Appendix C for additional neighborhood demographic information.

⁵⁶ represents the likelihood that two persons, chosen at random from the same area, belong to different race or ethnic groups; 0 means no diversity and 100 means complete diversity

Unemployment rate	6%	6%	10%	7%	5%
-------------------	----	----	-----	----	----

Table 6. Neighborhood Demographics. Source: Healthy Development Measurement Tool⁵⁷

Note: Figures for Tenderloin and Chinatown are based on unweighted means of figures for the Planning Department neighborhoods to which they refer (see Table 4).

Density and Mobility

The Tenderloin far surpasses the other neighborhoods and the city as a whole with respect to residential and population densities, South of Market exhibits the greatest residential mobility, and the Mission has the largest average household size (see Table 7).

Density and Mobility	Tenderloin	Chinatown	South of Market	Mission	Citywide
Average household size	2	1.75	2	3	2
Residential density (average housing units per acre)	63	29.75	10	20	12
Population density (people per square mile)	60,617	28,854	11,016	31,961	15,381
Residential mobility (proportion of persons residing in the same house as five years ago)	47%	55%	36%	52%	54%

Table 7. Neighborhood Density and Mobility. Source: Healthy Development Measurement Tool

Note: Figures for Tenderloin and Chinatown are based on unweighted means of figures for the Planning Department neighborhoods to which they refer (see Table 4).

Quality of Life

All four neighborhoods have more per-person code violations for housing safety and habitability than the city average, with the Tenderloin and the Mission showing the highest numbers (see Table 8).⁵⁸ The Tenderloin also has the highest density of take-out alcohol outlets. Relative to the other neighborhoods and the city as a whole, a much smaller proportion of South of Market residents live close to a park, recreation facility, or public library.

⁵⁷ The majority of HDMT indicators that use U.S. Census data rely on data from the 2000 Census, obtained from the GeoLytics® CensusCD® Neighborhood Change Database (NCDB) 1970-2000. In Spring 2008, some HDMT indicators using Census-based population and household denominator data were updated with new 2007 data released by Applied Geographic Solutions (AGS) in an attempt to reflect the changing population demographics of San Francisco. Unfortunately, AGS does not provide updated estimates for all Census variables used in the HDMT. As a result, HDMT indicators are based on a combination of both 2000 and 2007 data.

⁵⁸ See Appendix C for additional neighborhood quality of life indicators.

Quality of life Indicator	Tenderloin	Chinatown	South of Market	Mission	Citywide
Proportion of population within 1/4 mile of neighborhood or regional park	86%	99%	72%	85%	88%
Proportion of population within 1/4 mile of a recreation facility	71%	60%	29%	57%	46%
Proportion of population within 1/2 mile and 1 mile of a public library	67%	78%	36%	51%	57%
Density of take-out alcohol outlets (per square mile)	102	79.5	28	48	18
Number of code violations for housing safety and habitability in the past year (per 1,000 people)	27.5	15.5	30	24	12

Table 8. Quality of Life Indicators. Source: Healthy Development Measurement Tool

Note: Figures for Tenderloin and Chinatown are based on unweighted means of figures for the Planning Department neighborhoods to which they refer (see Table 4).

3.7. Key Neighborhoods

Tenderloin

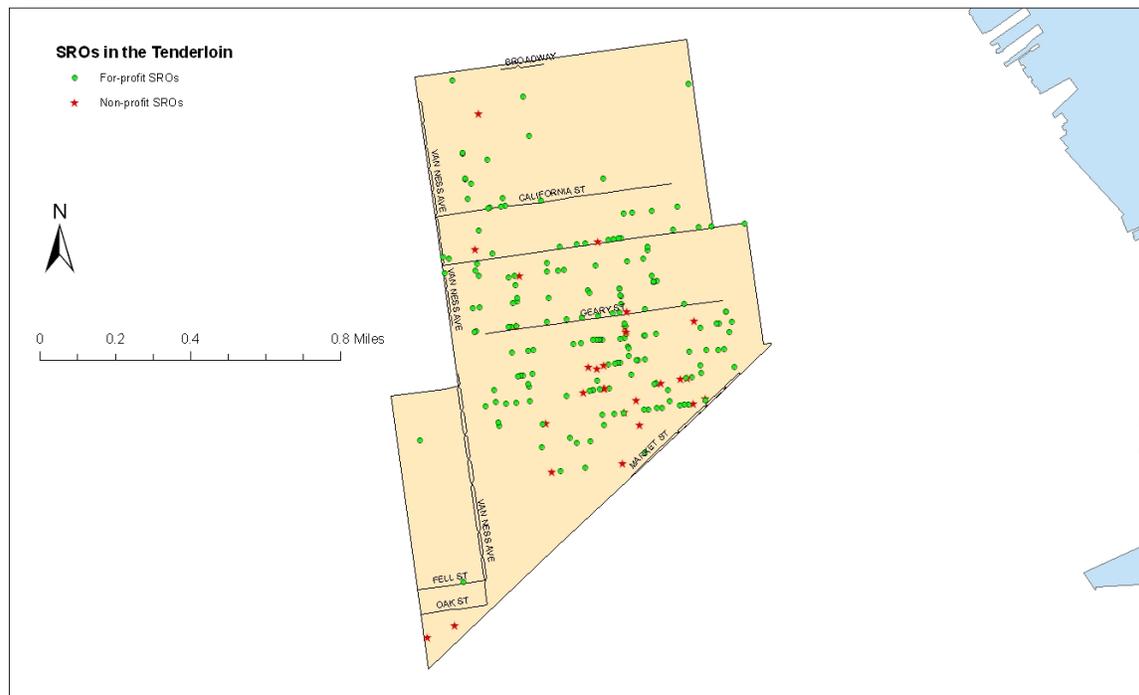


Figure 3. SROs in the Tenderloin (Downtown/Civic Center and Nob Hill).

In this report, “Tenderloin” refers to the Planning Department’s Downtown/Civic Center and Nob Hill neighborhoods.⁵⁹ One service provider noted that the Tenderloin mostly consists of SRO hotels and one-bedroom apartments, as opposed to many other parts of San Francisco in which multiple-bedroom apartments are a housing alternative. It is the most densely populated of the four SRO neighborhoods, and most Tenderloin residents are at or below the poverty level. This neighborhood is also home to a number of support services. As one interviewee noted, “there is as much good service provision and creativity as there is edgy, hideous stuff.” He offered the example of a local restaurant that serves low-cost breakfast and lunch, setting up accounts for customers who are unable to manage their own expenditures. Food is easily accessible—but not necessarily fresh, nutritious food—and residents are close to medical services, public transportation, and downtown.

Of the four SRO neighborhoods, the Tenderloin has the highest density of take-out alcohol outlets and a relatively large number of code violations for housing safety and habitability. It also has a reputation for containing high concentrations of individuals with mental health problems and people involved with substance abuse/recovery and other criminal activities such as prostitution. Key informants noted that, compared to other SRO neighborhoods, there is generally more fear of break-ins among residents in the Tenderloin’s SROs, and most of the buildings have security measures in place (e.g., multiple locks, windows that do not open). Residents are said to not want to go out at night because of personal safety concerns. Some SRO residents are also reported to be engaged in illegal and aberrant behavior, especially related to drugs.

A number of the Tenderloin’s SROs contain high concentrations of seniors. Many seniors have lived in the same SRO unit for ten to twenty years or more, “aging in place”, and may have physical or mental health problems. While some seniors who live in SROs need a fair amount of structure and support, others are capable of living independently. One interviewee noted that “ghettoizing” certain populations in the Tenderloin presents quality of life problems and health and safety concerns for residents and their visitors. Still, he went on to explain that many seniors who live in Tenderloin SROs prefer to stay where they are when offered alternative housing because “despite the negative aspects, people build community where they find it.” This is one reason why some advocates support the expansion of senior-only SRO housing.

In addition to seniors and single adults, several interviewees noted that there seems to be an increasing population of families, especially Latinos, living in the Tenderloin’s SRO hotels.

⁵⁹ The Tenderloin is sometimes referred to as “Central City”.

Chinatown

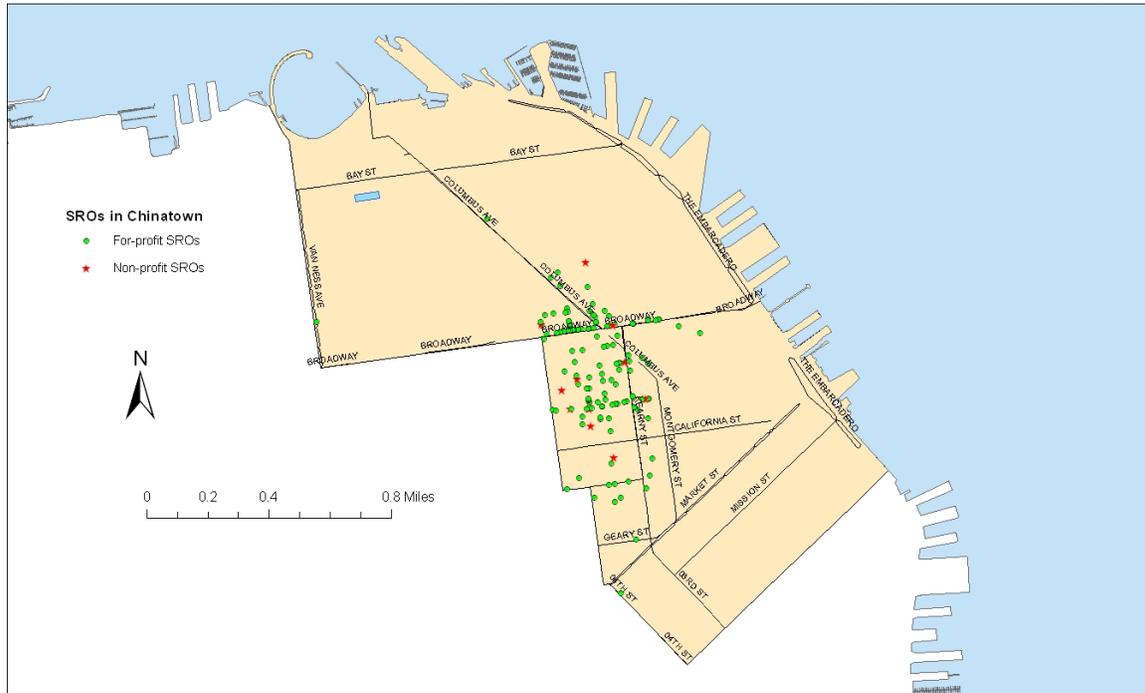


Figure 4. SROs in Chinatown (Chinatown, Financial District, North Beach, and Russian Hill).

In this report, “Chinatown” includes the Planning Department’s Chinatown, Financial District, North Beach, and Russian Hill neighborhoods. All four neighborhoods are included because many SROs lie along their borders. Chinatown is an ethnic enclave with a large Chinese immigrant population. Several service providers mentioned their clients’ strong neighborhood attachment.

Chinatown’s SRO residents are principally low-income families, new immigrants, and seniors. Several interviewees noted that while families who live in SROs in other neighborhoods move out more frequently, often to shelters or to the street, families who live in Chinatown’s SROs tend to stay for longer periods of time. This may be because of the support they have in SROs (e.g., grandparents, neighbors), or because non-SRO housing options are limited in Chinatown.

Compared to SROs in other neighborhoods, those in Chinatown are more apartment-like (e.g., often have no front desk) and are said to be more communal and have more family and neighbor involvement. Several key informants noted that Chinatown’s SROs have less of the tenant problems that plague residential hotels in other neighborhoods, such as substance abuse/recovery, prostitution, transients, and personal safety concerns. Interviewees also noted that in Chinatown, the fact that residents tend to be older people and families who often share a common language further helps build community and decrease social isolation. One interviewee said that the Asian community in Chinatown tends to be insular and not touch the mainstream systems, and for this reason SRO residents may be unaware of available resources. Because Chinatown SRO buildings are locked, on-site outreach efforts usually necessitate already having a contact in each hotel.

South of Market (SOMA)

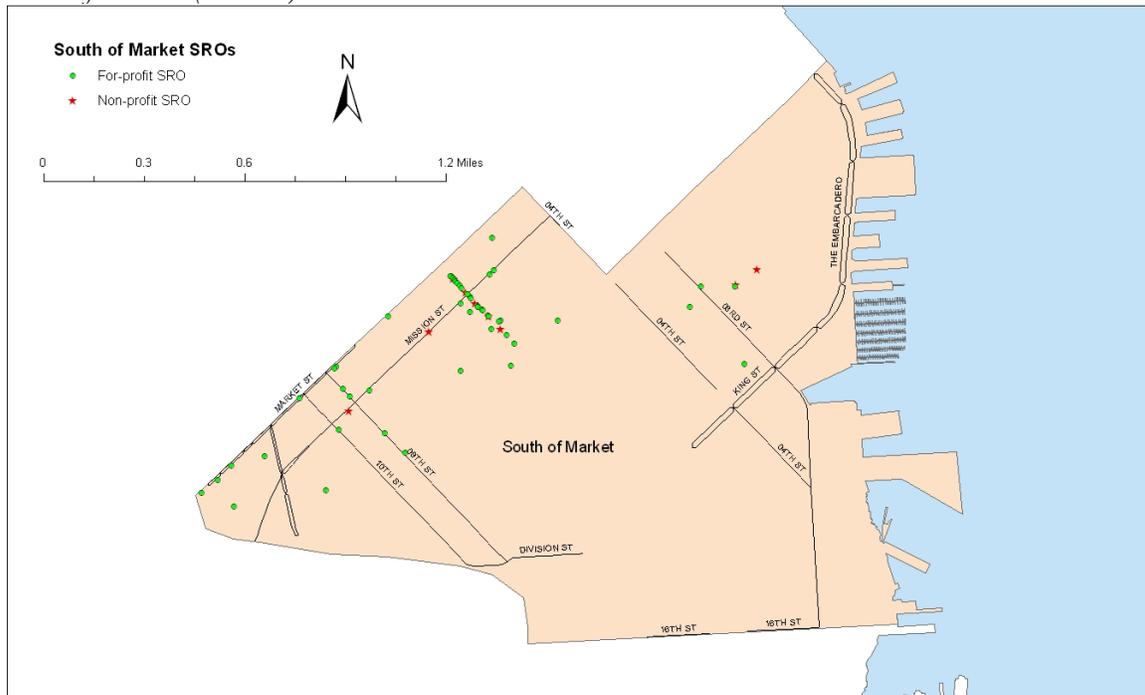


Figure 5. SROs South of Market.

A large number of SROs in the South of Market (SOMA) district are clustered along the 6th Street corridor.⁶⁰ SOMA is a relatively poor neighborhood⁶¹ and has the highest residential mobility rate of the four main SRO neighborhoods. It also has the largest number of property crimes per person and, like the Tenderloin, a large number of code violations for housing safety and habitability.

SOMA's SRO residents have a reputation for being more transient than those other SRO neighborhoods. Some interviewees noted that, aside from the 6th St. corridor, SOMA's SROs are generally more "livable" than those in the Tenderloin and Chinatown. On the other hand, several interviewees described the 6th St. corridor, where many of SOMA's SROs are located, as dangerous and rife with criminal activity.

⁶⁰ "6th Street corridor" refers to the area bordered by 5th and 7th St.'s and Market and Harrison

⁶¹ 23% below the poverty level and 10% unemployed, versus 11% and 5% citywide, respectively. Source: Healthy Development Measurement Tool

Mission

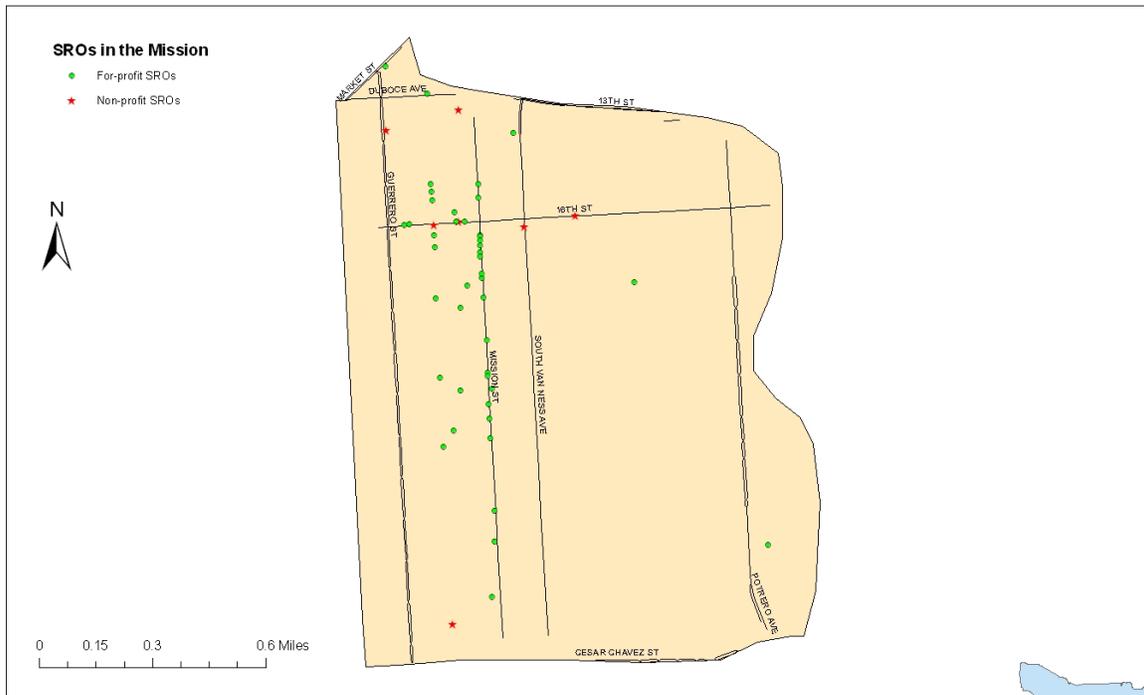


Figure 6. SROs in the Mission.

The largest share of the Mission's SROs is located on Mission Street. This neighborhood has a large Latino immigrant population and a relatively large proportion of younger residents.⁶²

Key informant interviews did not yield information about the Mission's SROs, suggesting that these residential hotels are somehow distinct or disconnected from SROs in the Tenderloin, Chinatown, and South of Market.

3.8. Building Properties

Year Built

San Francisco SRO construction began in earnest at the beginning of the 20th century (see Figure 7). The 1906 earthquake and subsequent fires caused widespread destruction throughout the city, resulting in an upsurge of SRO construction between 1907 and 1915⁶³, at which time most reconstruction was complete. After 1930, SRO construction began to taper off dramatically.

⁶² 17% are under 18 years old, compared to 14% citywide. Source: Healthy Development Measurement Tool

⁶³ The Panama-Pacific International Exposition was held in San Francisco in 1915, another reason for construction in the city during this time.

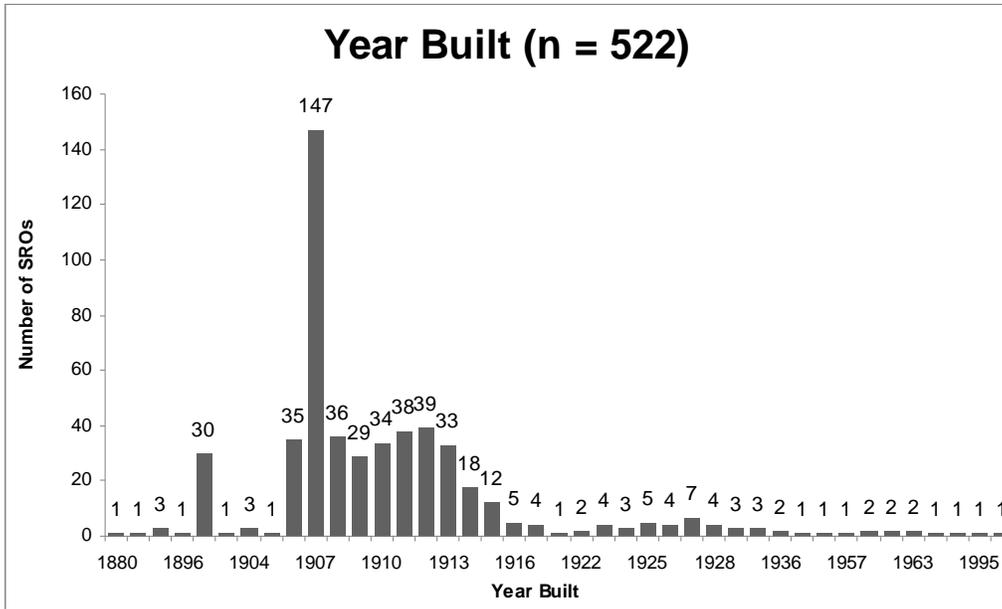


Figure 7. Year Built for All SROs. Note: Time axis not to scale.
 Data Source: San Francisco Office of the Assessor-Recorder

The Tenderloin contains a large share of the hotels built in the 1920s, while post-1950 construction is largely in the “other” neighborhoods (see Figure 8).

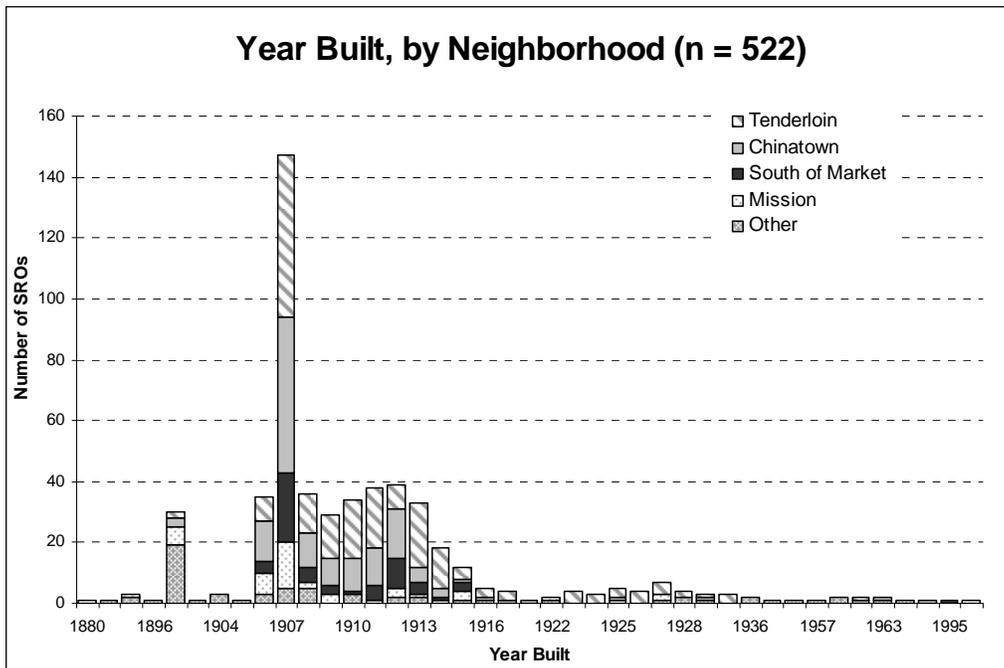


Figure 8. Year Built, by Neighborhood. Note: Time axis not to scale.
 Data Source: San Francisco Office of the Assessor-Recorder

Number of Units per Hotel

Eighty percent of San Francisco’s SROs have less than seventy units (see Figure 9). The average number of units per building is 44.5, and the median is 31.⁶⁴

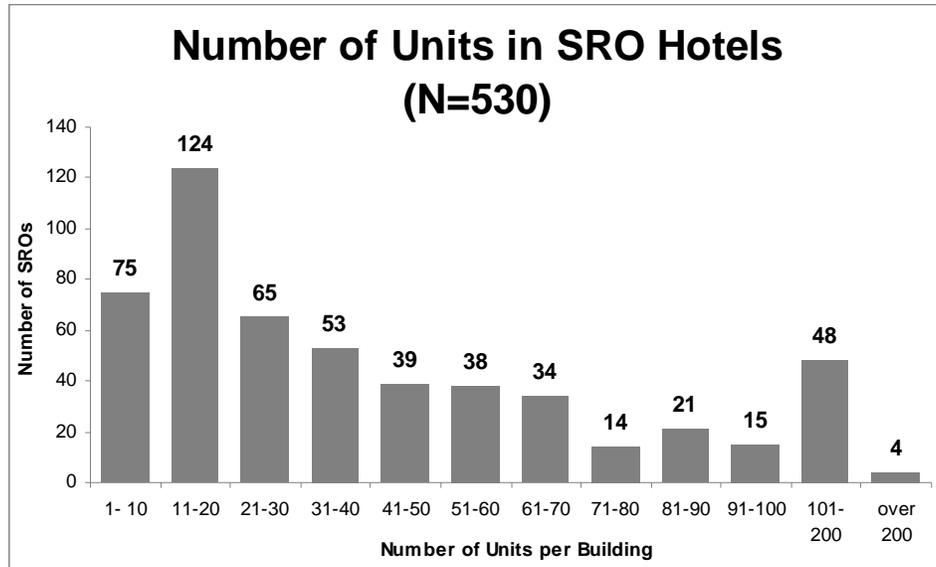


Figure 9: Number of Units in SRO Hotels
Data Source: San Francisco Planning Department

Many of the larger hotels are located in the Tenderloin and SOMA, while Chinatown and Mission SROs tend to have fewer units per building (see Table 9 and Figure 10).

Number of Units per SRO, by Neighborhood		
	Mean	Median
Tenderloin (N=208)	52.25	40
Chinatown (N=145)	39.3	28
SOMA (N=60)	54.2	45
Mission (N=50)	39.6	27.5
Other (N=67)	26.8	17

Table 9: Number of Units per SRO, by Neighborhood
Data Source: San Francisco Planning Department

⁶⁴ Standard deviation = 40.2

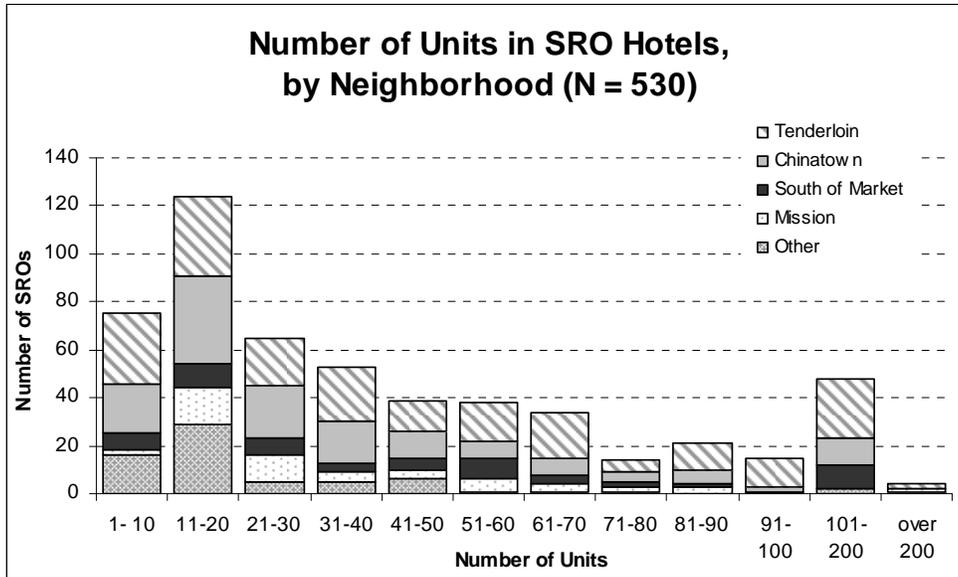


Figure 10: Number of Units in SRO Hotels, by Neighborhood
 Data Source: San Francisco Planning Department

Bedroom to Bathroom Ratios

On average, San Francisco’s SRO hotels have 4.17 units for each bathroom, although the average bedroom to bathroom ratio varies across neighborhoods (see Figure 11). The Mission’s SROs have the highest number of units per bathroom, followed by those in Chinatown, South of Market, and “other” neighborhoods. The Tenderloin’s SROs exhibit the lowest average bedroom to bathroom ratio.

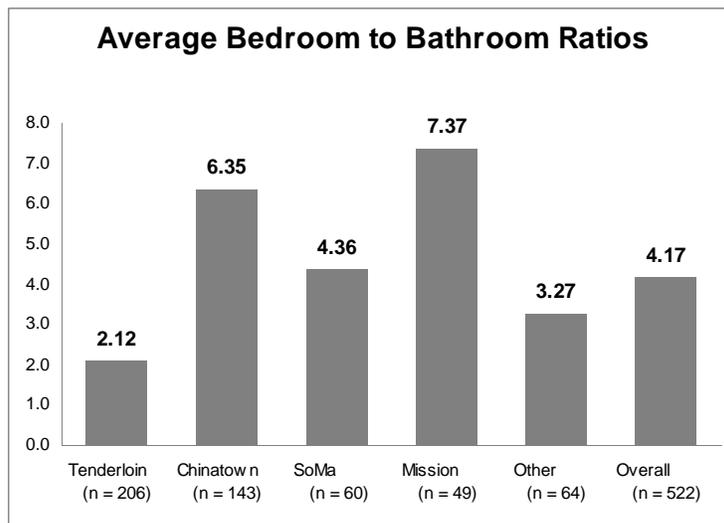


Figure 11: Bedroom to Bathroom Ratios, by Neighborhood and Overall
 Data Sources: San Francisco Planning Department (number of units) and San Francisco Office of the Assessor-Recorder (number of bathrooms)

3.9. Monthly Rent

Monthly rents range from \$195⁶⁵ to \$2,943 (see Table 10 and Figures 12 and 13).⁶⁶ However, such high rents are unusual and do not represent the typical SRO. Over two-thirds⁶⁷ of these hotels have monthly rents below \$601, while less than 10%⁶⁸ have a monthly rent that exceeds \$1000.

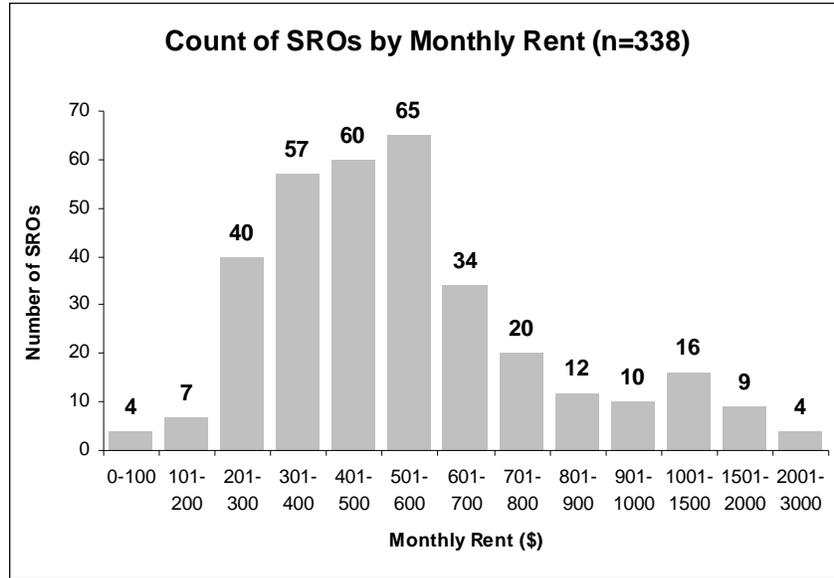


Figure 12. SRO Monthly Rent.

Data Source: Housing Inspection Services, Residential Hotel Unit Conversion and Demolition Ordinance, Executive Summary for Hotel Unit Usage Report - Group by Status, 9/18/08

Chinatown has the lowest mean and median rents, while SROs outside the four main neighborhoods have the highest mean and median rents.

Neighborhood	Mean Rent (\$)	Median Rent (\$)	Minimum Rent (\$)	Maximum Rent (\$)	n (out of total)
Tenderloin	724	600	195	2,943	129 (of 208)
Chinatown	380	318	0	1,600	111 (of 145)
SOMA	517	540	300	759	31 (of 60)
Mission	538	600	300	1,100	34 (of 50)
Other	881	699	210	2,270	33 (of 67)
Overall	589	512	0	2,943	338 (of 530)

Table 10. SRO Monthly Rents by Neighborhood.

Data Source: Housing Inspection Services, Residential Hotel Unit Conversion and Demolition Ordinance, Executive Summary for Hotel Unit Usage Report - Group by Status, 9/18/08

⁶⁵ the smallest non-zero rent

⁶⁶ Rent data from September 2008 is available for 338 of the 530 SROs, or about 64% of the total.

⁶⁷ 69% (233 hotels)

⁶⁸ 8.6% (29 hotels)

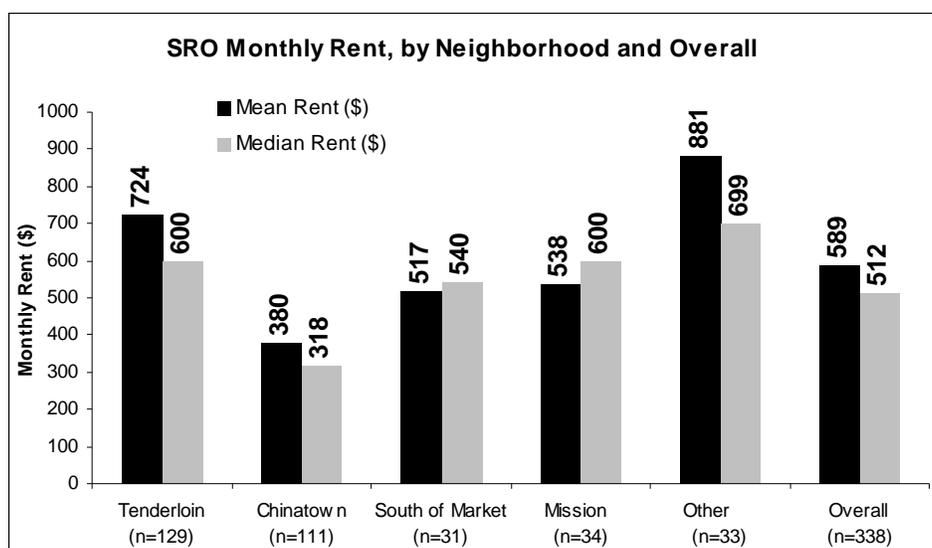


Figure 13. SRO Monthly Rent, by Neighborhood and Overall.

Data Source: Housing Inspection Services, Residential Hotel Unit Conversion and Demolition Ordinance, Executive Summary for Hotel Unit Usage Report - Group by Status, 9/18/08

3.10. Owners

As illustrated in Table 11, most SRO owners have local addresses.

Location (Zip Code)	Number of SRO Owners (N = 522)	Percentage of Total
San Francisco (941--)	420	80.5%
Bay Area (94---)	497	95.2%
California (9----)	517	99.0%

Table 11. SRO Owners by State

Note: 94--- Zip Codes (“Bay Area”) include Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma counties

Data Source: San Francisco Office of the Assessor-Recorder

Just over ten percent of San Francisco’s SROs are nonprofit-owned, and another 18% belong to family trusts (see Table 12). At least half belong to private, for-profit owners.

Owner Type	Number	Proportion of Total
Nonprofit	66	12.5%
INC, CORP, LLC, LTD, LP	283	53.4%
Family Trust	96	18.1%
Other	85	16.0%

Table 12. SRO Owners by Owner Type

Key informants discussed the range of attitudes and approaches held by SRO owners, and their impact on residents. One interviewee noted that “property management can make or break a community”, and both non-profit and for-profit SROs vary greatly in this respect. The SRO Task Force strives to bring owners together with residents and other key stakeholders.

Several interviewees alluded to management companies that are not particularly responsive and owners who have “caused trouble” such as shutting off the heat or restricting the time when residents can use the kitchen. Moreover, as one interviewee noted, case managers may have a harm reduction philosophy while property managers may have a zero-tolerance policy (e.g., with respect to substance abuse or other criminal activity).

While owners and managers display a varying level of responsiveness to residents’ needs, key informants generally agreed that the situation is improving overall. A Tenderloin service provider noted that “it is remarkable how much heart and community sense there is in many of the SROs. There is lots of good stuff that goes on in the SROs and staff can be remarkably responsible.”

Throughout the key stakeholder interviews, a clear distinction emerged between perceptions of privately-owned SROs and those that have city or nonprofit involvement. While the generalizations below are not necessarily based on facts or even personal experience, they are important in that they reflect notions and stereotypes held by some service providers. Prevalent themes include:

Privately-owned SROs

- no resources or on-site support
- often have no lease and no/unclear rules
- residents often stay for very short periods of time (e.g., one week)
- incidents of prostitution, drug-dealing, break-ins, violence, noise, unhygienic bathrooms
- buildings in ill repair
- more expensive rent

City-leased / Nonprofit-run SROs

- on-site case managers
- coordinated responses, rules (may be overly restrictive), security
- buildings must be well-maintained
- base of stable residents
- foster a sense of community and social networks (e.g., welcome parties for new tenants, communal events)
- more connected to services (for example, 70%-80% of Glide’s SRO clients live in nonprofit hotels)
- more difficult to get into, long waitlists (ten to twelve months)

3.11. Public Housing and Section 8

Aside from temporary shelters, public housing developments and Section 8 vouchers are the primary housing alternatives for low-income San Francisco residents who might otherwise

live in SROs.⁶⁹ This section describes public housing and Section 8, comparing and contrasting them with SROs across various dimensions.

Units and Residents

In San Francisco, more low-income people live in SRO hotels than in public housing (see Figure 14). There are only approximately five Section 8 voucher holders living in SROs.⁷⁰

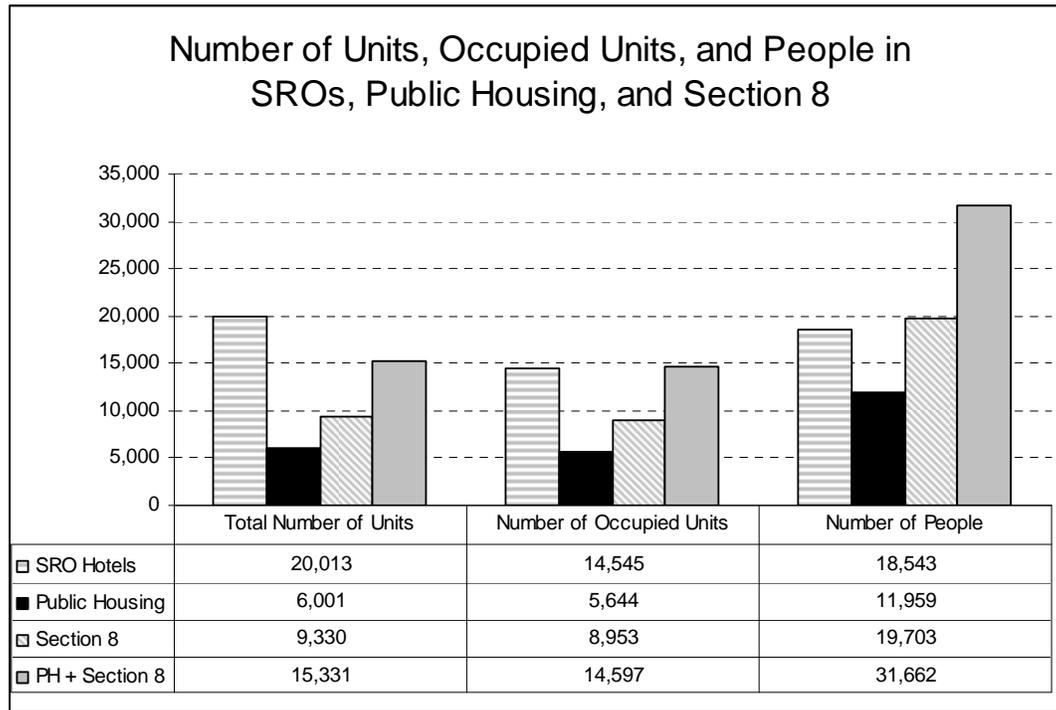


Figure 14. Total Number of Units, Number of Occupied Units, and Number of People in SROs, Public Housing, and Section 8.

Building Properties

San Francisco’s Public Housing developments were constructed much more recently than its SROs. The average year built for San Francisco’s SROs is 1911, and the average year built for Public Housing developments is 1968. Of San Francisco’s 51 Public Housing developments, including Hope VI sites, nine were rehabilitated since their original construction⁷¹. Figure 15 illustrates the number of Public Housing developments built or rehabilitated in a given year.

⁶⁹ The San Francisco Housing Authority (SFHA) provides for the city’s public housing residents and Section 8 participants.

⁷⁰ According to Kyle Pedersen, Director, Governmental Affairs & Communications, San Francisco Housing Authority.

⁷¹ The average year rehabilitated is 1985.

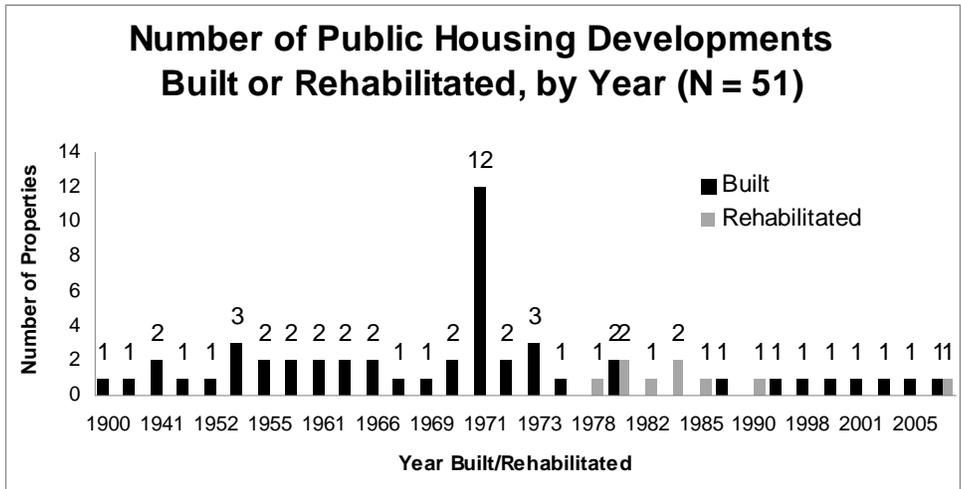


Figure 15. Number of Public Housing Developments Built or Rehabilitated, by Year
 Data Source: SFHA (<http://www.sfha.org/about/developments/index.htm>) (includes senior sites, family sites, and Hope VI sites)

While construction of SROs began to dwindle in the 1930s, Public Housing construction began in earnest in the 1950s, ramping up through the end of the 1970s. Figure 16 shows the percentage of total stock of each type of housing constructed in a given year.

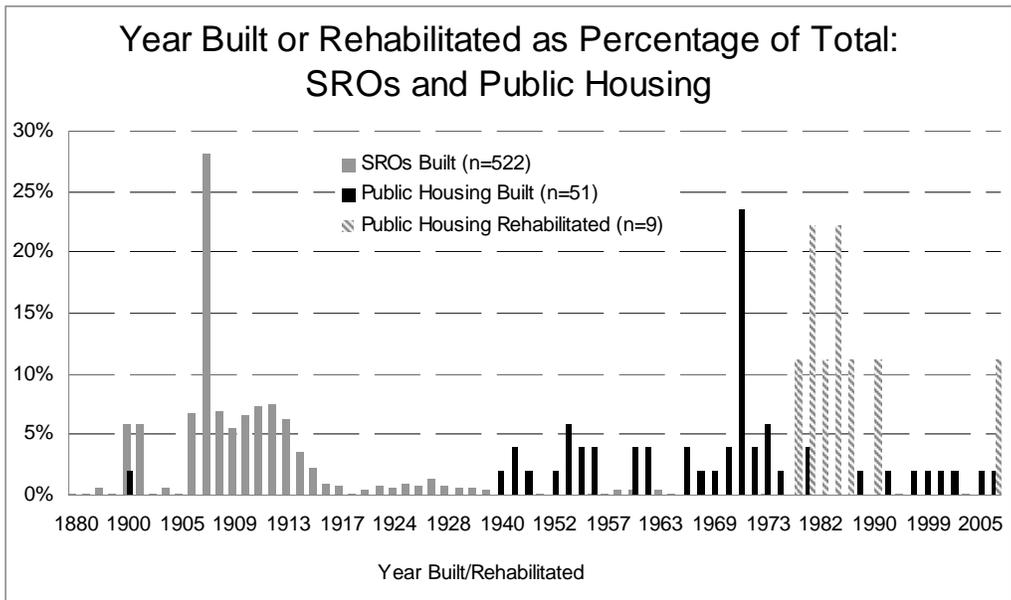


Figure 16: Year Built or Rehabilitated as a Percentage of Total: SROs and Public Housing
 Data Source for SROs: San Francisco Office of the Assessor-Recorder
 Data Source for Public Housing: SFHA (<http://www.sfha.org/about/developments/index.htm>)

Rent and Household Income

Public housing residents and Section 8 voucher holders pay far less in monthly rent than the average SRO resident (see Table 13).

	Public Housing	Section 8	SRO Hotel
Average Tenant Rent	\$286.95	\$466.11	\$598
Average Household Income	\$13,206	\$17,548	unknown

Table 13. Average Rent and Household Income for Public Housing and Section 8
Source for PH and Section 8: San Francisco Housing Authority data from September 27, 2007
Source for SRO Hotels: Housing Inspection Services, Residential Hotel Unit Conversion and Demolition Ordinance, Executive Summary for Hotel Unit Usage Report - Group by Status, 9/18/08

Tenant Demographics

African-Americans represent the largest proportion of Public Housing and Section 8 residents, followed by Asian/Pacific Islanders, Whites, and Latinos (see Table 14). Based on this report’s findings, the ethnic composition of SRO residents differs from that of Public Housing and Section 8 residents—Asian/Pacific Islanders make up almost half of the total, followed by Whites, African-Americans, and Latinos.⁷²

	Public Housing	Section 8	SROs (based on this report’s master profile)
African-American	41.6%	31.8%	18.2%
Asian/Pacific Islander	26.8%	30.0%	45.6%
White	18.6%	28.1%	23.7%
Latino	10.6%	9.1%	6.5%
Native American	0.5%	0.7%	0.6%
Other	1.9%	0.3%	5.5% (other / unknown / decline to state)

Table 14. Racial Composition of Public Housing and Section 8.
Source for Public Housing and Section 8: San Francisco Housing Authority data from September 27, 2007

Resources⁷³

In addition to living in more recently constructed buildings and paying lower monthly rents than SRO tenants, Public Housing residents are granted numerous opportunities to voice their concerns and access additional services, none of which are mandated or guaranteed to people who live in SROs. For example:

- Public Commission – The SFHA Commission has seven members, appointed by the mayor, two of whom are public housing residents. The Commission makes decisions regarding the SFHA at public meetings where residents may ask questions and make comments.

⁷² This does not necessarily represent the true ethnic composition of all SRO residents, as it is based on aggregated caseload data from a select number of HSA programs.

⁷³ Information is based on interview with Kyle Pederson, Director, Governmental Affairs & Communications, San Francisco Housing Authority, conducted by Dan Kelly, Director of Planning, Human Services Agency, on 3/16/09.

- Public Housing Administrative Plan—Residents have the opportunity to comment on and influence SFHA’s Public Housing Administrative Plan, which sets goals and allocates resources for the upcoming year. This plan must be submitted to the Department of Housing and Urban Development (HUD) annually.
- On-Site Resident Council—HUD gives the local Housing Authorities \$25 per unit per year for "resident participation." SFHA is planning to give the Resident Councils the structure to budget these funds for improvements at the sites.
- Property Managers and Labor Force— Each public housing group has a property manager and a labor force to fix problems and respond to complaints.⁷⁴ The residents can either go through the property managers to request repairs, or they can use the City's 311 phone system.
- Grant Money—SFHA can apply for federal, state, and local grants to improve the sites and develop the community.
- Support Services—SFHA has Memoranda of Understanding (MOUs) with non-profits, and one with the Department of Aging and Adult Services (DAAS), to provide support services to seniors and families.
- Head Start—Each family site has a Head Start Center that pulls from the tenants and from the surrounding neighborhood.
- Security—Although some have a reputation for being dangerous, the developments have private security officers on site and SFHA has an MOU with the San Francisco Police Department to conduct community policing activities.
- Screening—SFHA conducts criminal background checks on applicants and monitors the developments for drug activity, frequently evicting residents who engage in illegal activity.

⁷⁴ In order to organize its resources, SFHA groups two or three similar smaller developments together (e.g., for seniors, for families). Large developments are their own group.

4. Master Profile

An estimated 18,500 people live in San Francisco's SRO hotels.⁷⁵ This section describes San Francisco's SRO residents based on information from five datasets comprising ten human service programs, merged by Social Security Number (see Table 15). This master profile describes 11,660 unduplicated individuals, or 63% of the estimated total number of SRO residents. While this report draws on data from additional sources, it was not possible to incorporate their information into the master dataset because they do not include Social Security Number and/or were obtained as aggregate information. Findings from these additional data sources are discussed in subsequent sections.

Key Findings for Master Profile of SRO Residents

Gender

- 61.5% male, 38.5% female
- males are the majority for all ethnicities except Asian/Pacific Islanders
- males are the majority for English- and Spanish-speakers, but not for Chinese- and other non-English-speakers

Age

- average age is 55.1 years; for males it is 54.5; for females, 56.0
- mean age is youngest for Latinos and oldest for Asian/Pacific Islanders
- mean age is youngest for those whose primary language is Spanish and oldest for those whose primary language is an "other" non-English language (i.e., not Chinese or Spanish)

Ethnicity

- close to half are Asian/Pacific Islanders, just under one-fourth are White, almost one-fifth are African-American

Language Spoken

- more than half speak English, slightly more than one-third speak Chinese

4.1. Methodology

The Master Profile comprises caseload data from ten human service programs:

Adult Protective Services (APS)
California Work Opportunities and Responsibility to Kids (CalWORKs)
(CalWIN database)
Cash Assistance Program for Immigrants (CAPI) (CalWIN database)
County Adult Assistance Programs (CAAP) (CalWIN database)
Food Stamps (CalWIN database)

⁷⁵ Estimated using average occupancy rate for zero-bedroom apartments in San Francisco, 2005-2007, according to ACS data (source: IPUMS)

Foster Care (CalWIN database)
In-Home Supportive Services (IHSS)
Medi-Cal (CalWIN database)
Office on the Aging (OOA)
Supplemental Security Income (SSI)

Table 15. Human Service Programs Included in SRO Resident Master Dataset.

Most individuals in the master dataset (57%) participate in only one of these ten programs, and nobody participates in more than five (see Figure 17).⁷⁶

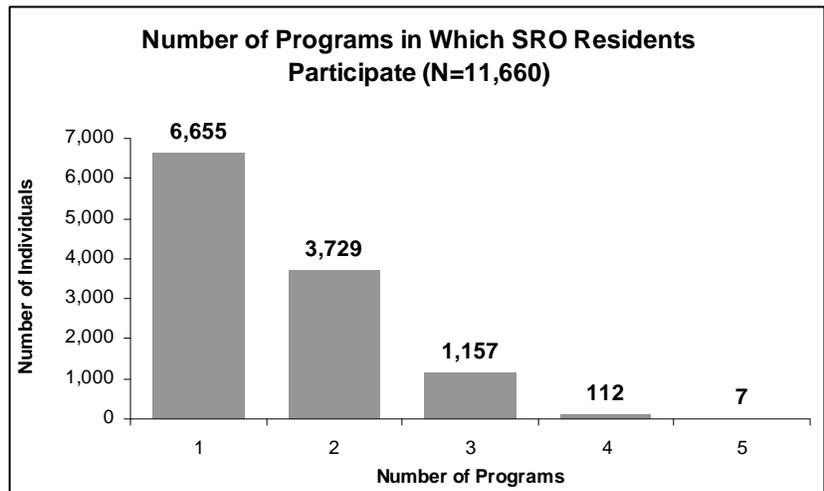


Figure 17. Number of Programs in Which SRO Residents Participate.

SRO residents who participate in more than one program have multiple entries for the same indicator (e.g., name, address, date of birth). In order to generate descriptive information about SRO residents, each individual was assigned the age, gender, ethnicity, and language given in the first of the following databases in which s/he appears:⁷⁷

- (1) SSI, (2) CalWIN (includes 6 programs), (3) IHSS, (4) APS, (5) OOA

Categories for ethnicity and language differ across the five databases. For this master profile, ethnicity was standardized into six categories: African-American, Asian/Pacific Islander (API), Latino, Native American, White, and Other/Decline to State. Language was standardized into four categories: Chinese (includes Cantonese, Mandarin, and other Chinese languages), English, Spanish, and Other/Decline to State.

4.2. Gender

The majority of individuals in the SRO master dataset are males (see Figure 18).

⁷⁶ See Appendix B for additional data about cross-program participation.

⁷⁷ SSI, CalWIN, and IHSS tend to be the most reliable databases because they involve payments. APS is the next most reliable, because data is entered by HSA staff, while OOA data is entered by contractors.

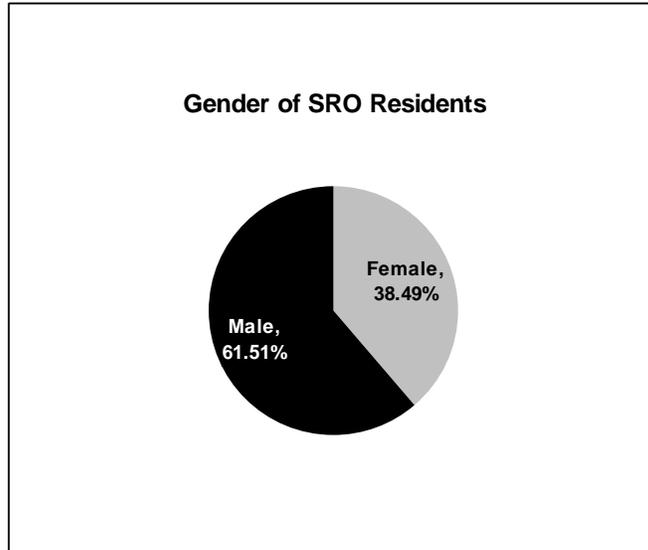


Figure 18. Gender of SRO Residents.

Gender by Ethnicity. With the exception of Asian/Pacific Islanders, the majority of SRO residents in each ethnic group are also males, to varying degrees (see Figure 19). In this respect, the API population living in SROs is distinct from the others.

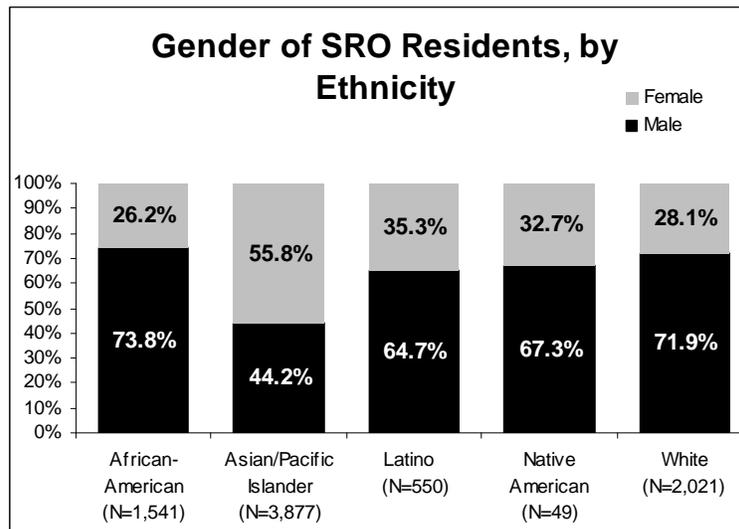


Figure 19. Gender of SRO Residents, by Ethnicity.

Gender by Language Spoken. Males are also the majority of SRO residents among those whose primary language is English or Spanish (see Figure 20). However, males are the minority among SRO residents for whom Chinese⁷⁸ or other non-English languages are the primary language.

⁷⁸ Here, “Chinese” refers to Cantonese, Mandarin, and other Chinese languages.

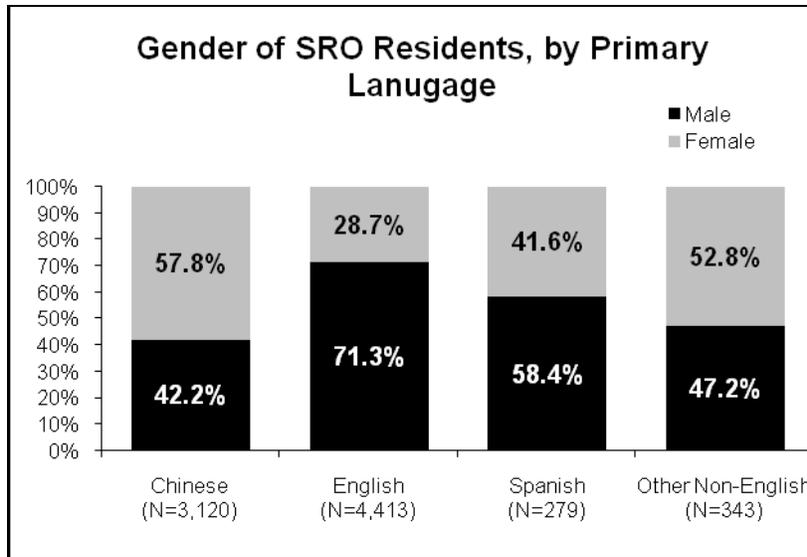


Figure 20. Gender of SRO Residents, by Primary Language.

4.3. Age

The average age of SRO residents in the master dataset is 55.1 years.⁷⁹ Figure 21 shows the age distribution of all individuals in the master dataset. Zero to twenty-one-year-olds hover between 0.3% and 0.5% of the total population, with a decline among twenty-two to twenty-five-year-olds. Thereafter, older people make up an increasingly greater proportion of SRO residents until the early sixties. There is another, smaller spike around the late sixties and early seventies, and another decline in the proportion of SRO residents that consists of those who are eighty and older.

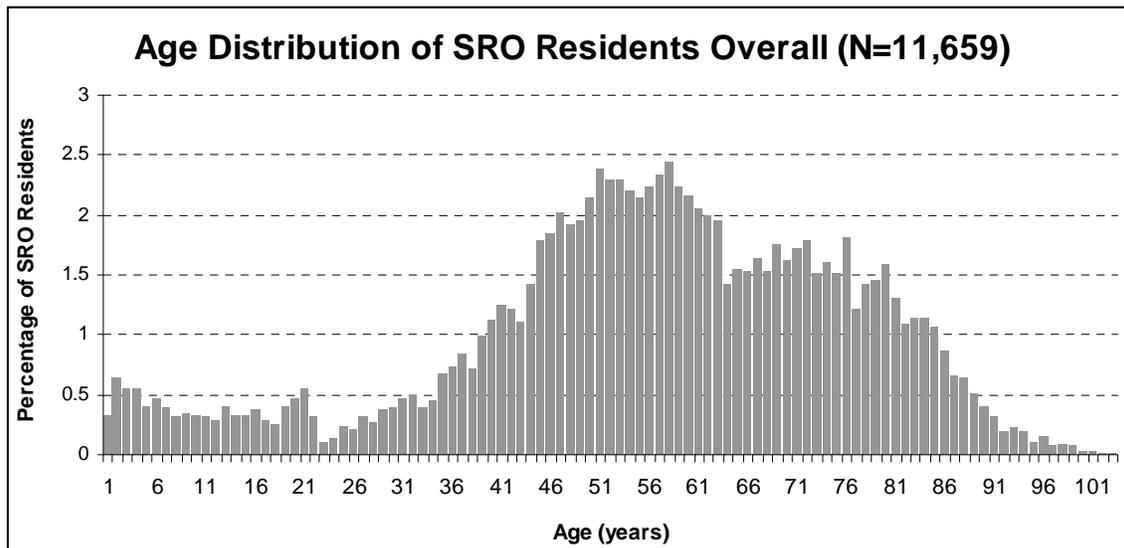


Figure 21. Age Distribution of SRO Residents Overall.

⁷⁹ standard deviation = 20.4 years

Age by Gender. The average age of males in the master dataset is 54.5 years, and the average age of females is 56.0.⁸⁰ Age distribution also differs by gender (see Figures 22 and 23). The male age distribution has one clear peak that spans the late forties through the early sixties. Female SRO residents are more evenly distributed across ages, with a larger proportion of older individuals than male SRO residents.

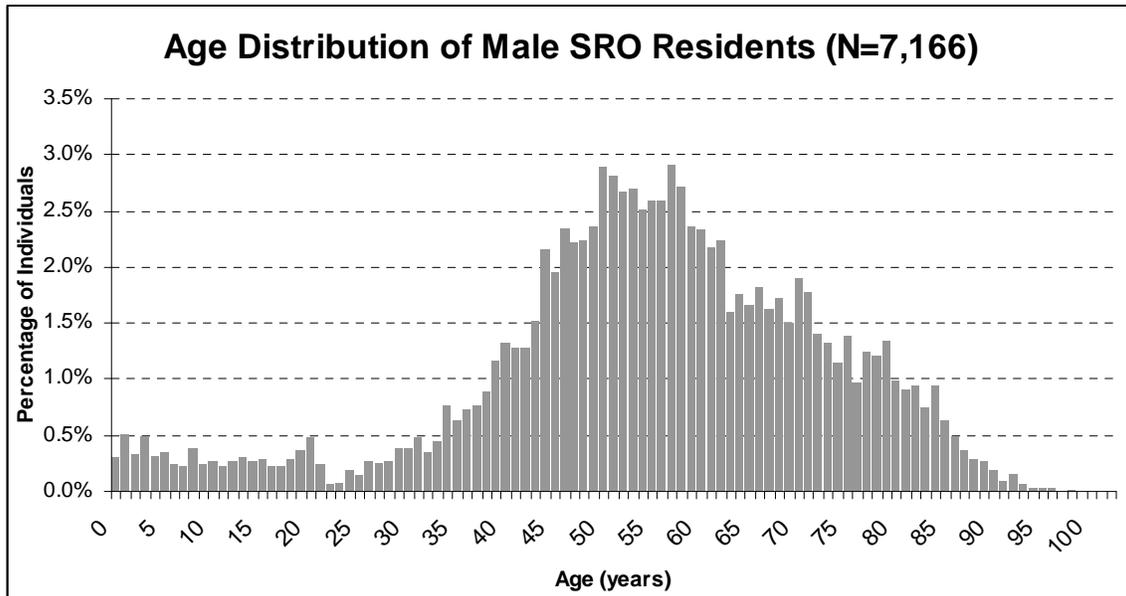


Figure 22. Age Distribution of Male SRO Residents.

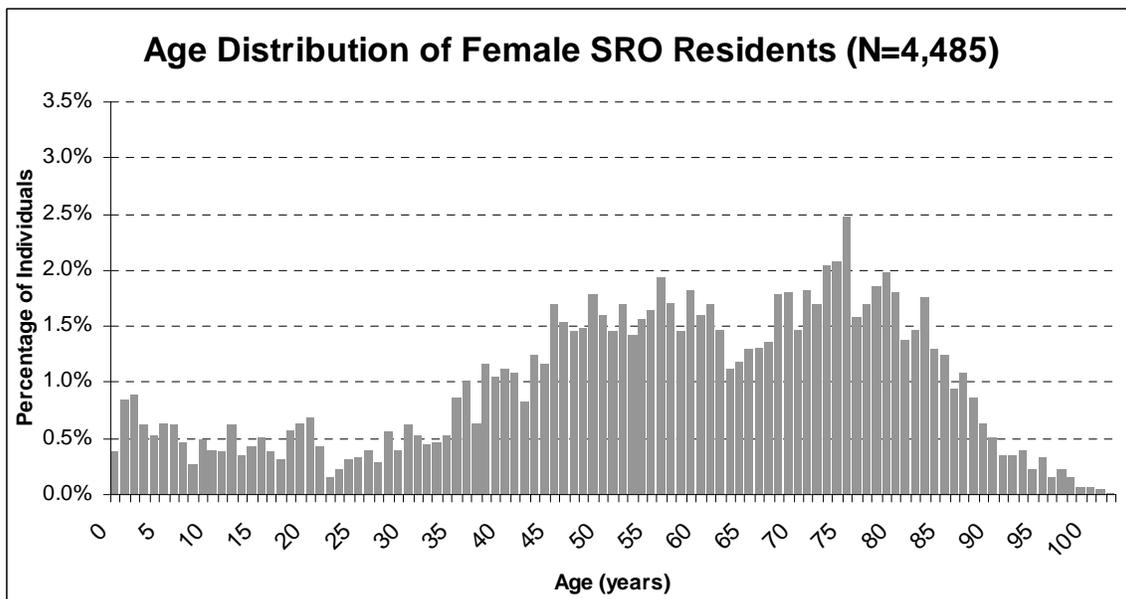


Figure 23. Age Distribution of Female SRO Residents.

Age by Ethnicity. Mean age also differs by ethnicity (see Table 16). On average, Latino SRO residents are youngest and Asian/Pacific Islanders are oldest.

⁸⁰ This difference is statistically significant, with $p=0.0002$.

Ethnicity	Mean Age (years)	Standard Deviation
African-American (N=1,547)	51.09	13.49
Asian/Pacific Islander (N=3,878)	57.01	26.95
Latino (N=550)	41.05	24.55
Native American (N=49)	49.37	14.05
White (N=2,021)	54.95	15.27
Other/Unknown/Decline to state (N=467)	52.69	16.91

Table 16. Mean Age with Standard Deviation for Master Dataset, by Ethnicity.

Figure 24 shows SRO residents' age distributions by ethnicity.⁸¹ Younger SRO residents in the master dataset (i.e., those under eighteen) are mostly Asian/Pacific Islanders and Latinos, suggesting that many of the families in SROs belong to those two ethnic groups. The largest proportions of African-Americans and Whites are between forty and sixty-five years old. Asian/Pacific Islanders also have the highest proportion of seniors among these SRO residents.

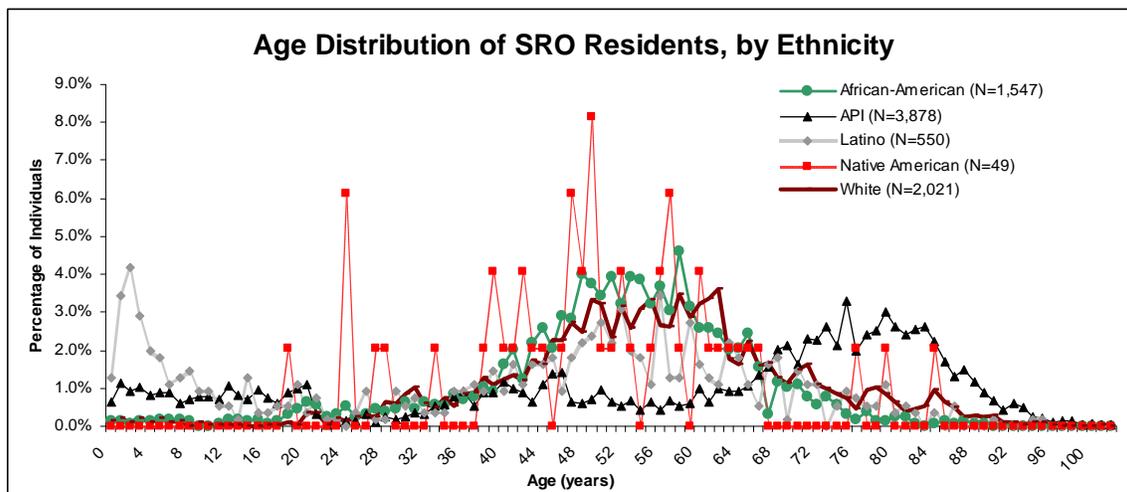


Figure 24. Age Distribution of SRO Residents, by Ethnicity.

Age by Language Spoken. On average, Spanish-speaking SRO residents are youngest and other non-English speakers (i.e., not Chinese or Spanish) are oldest (see Table 17).

Language	Mean Age (years)	Standard Deviation
Chinese ⁸² (N=3,121)	57.12	27.36
English (N=4,414)	51.84	16.27

⁸¹ see Appendix B for individual age distribution graphs by ethnicity

⁸² Here, “Chinese” refers to Cantonese, Mandarin, and other Chinese languages.

Language	Mean Age (years)	Standard Deviation
Spanish (N=279)	33.99	27.3
Other Non-English (N=343)	62.44	23.18

Table 17. Mean Age with Standard Deviation for Master Dataset, by Language Spoken.

Figure 25 shows the age distribution of SRO residents by primary language.⁸³ A large proportion of younger SRO residents in the master dataset speak Spanish as their primary language. The highest percentage of individuals who speak other non-English languages (i.e., not Chinese or Spanish) is among the oldest SRO residents. SRO residents whose primary language is English peak among forty-five to sixty-five-year-olds, and those whose primary language is Chinese peak among sixty-five to ninety-year-olds.

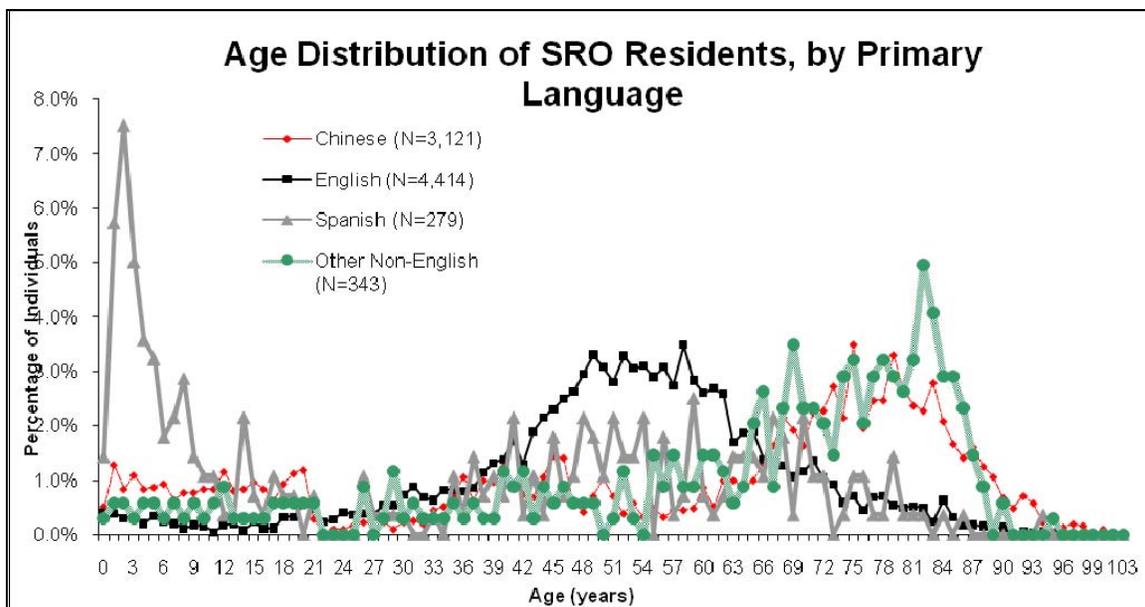


Figure 25. Age Distribution of SRO Residents, by Primary Language.

4.4. Ethnicity

Close to half of the SRO residents in this dataset are Asian/Pacific Islanders (see Figure 26). The next largest ethnic groups are Whites (23.7%) and African-Americans (18.2%).

⁸³ See Appendix B for language-specific age distribution histograms.

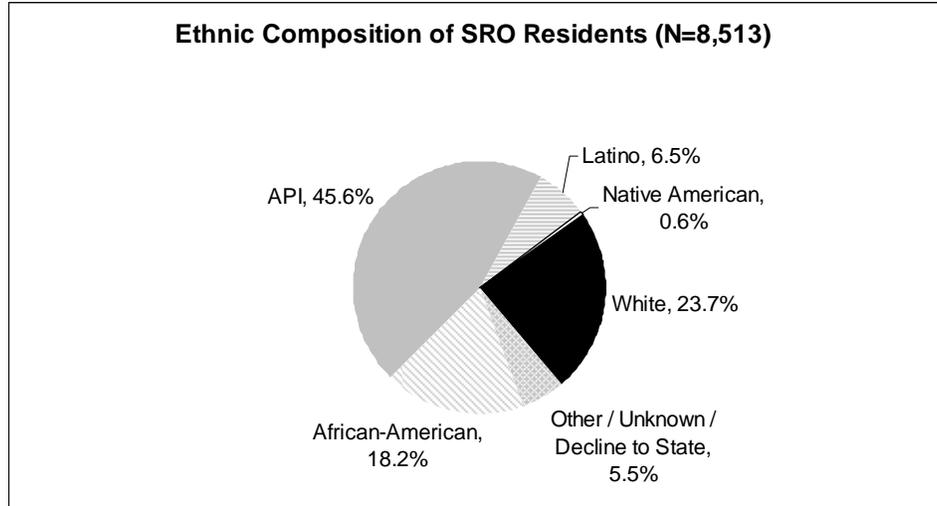


Figure 26. Ethnic Composition of SRO Residents.

4.5. Language Spoken

Just over half of the SRO residents in the master dataset speak English as their primary language (see Figure 27). The next most common primary language is Chinese, at 37.9%.⁸⁴

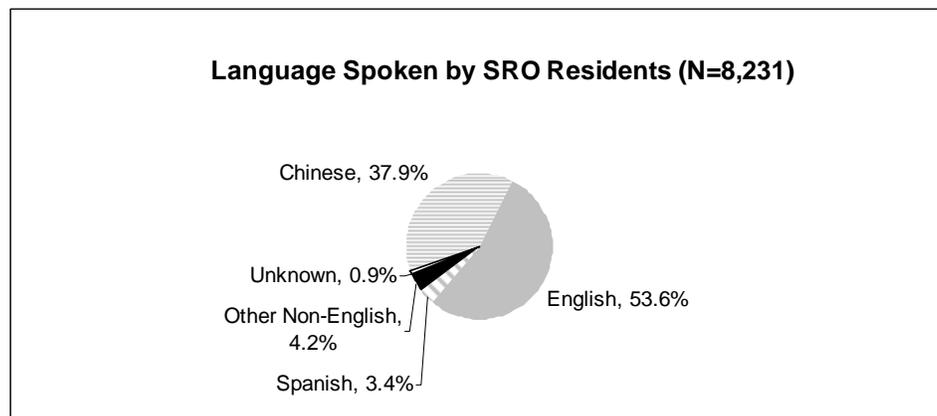


Figure 27. Language Spoken by SRO Residents.

4.6. Change over Time

While tracking changes in the SRO population over time is a valuable endeavor, it is beyond the scope of this study.⁸⁵ When asked about how the SRO population has changed over time, key informants offered a variety of responses. Some commented that the biggest change is an increased amount of families in SROs and a lack of exits and longer stays for these families. Another service provider noted that the population of 25- to 50-year-olds has been growing in recent years, perhaps due to Care Not Cash and the economic downturn. Others said that more people who receive unemployment benefits seem to be living in SROs. There was also mention of an increase in people with disabilities and DPH placement of chronic inebriants in SROs. Finally, another interviewee spoke of an increase in residents with acute psychological and medical health issues.

⁸⁴ Here, “Chinese” refers to Cantonese, Mandarin, and other Chinese languages.

⁸⁵ However, this report may be used as a baseline against which to compare future findings.

5. Seniors and Adults with Disabilities

5.1. Data Sources

Adult Protective Services, 2008 Calendar Year

Adult Protective Services (APS) assists all San Francisco elders (i.e., 65 and older) and adults with disabilities (18-64 years old) whose physical or mental conditions restrict their ability to protect their rights and who are abused or neglected or at risk of abuse or neglect. The two categories of abuse reported by APS are (1) abuse by others and (2) self-abuse, with more specific types of abuse identified within each category.

In-Home Supportive Services (IHSS), December 2008

In-Home Supportive Services (IHSS) is a statewide program that provides personal assistance services to low-income people with chronic and disabling conditions who need such assistance to remain safely in their homes and engaged in their communities. In San Francisco, most IHSS beneficiaries are over 65 years of age. The remainder are younger adults as well as a small number of children. IHSS includes chore and house cleaning services and personal care (e.g., assistance with eating, bathing, dressing, and using the toilet).

Office on the Aging (OOA), January 2009

The Office on the Aging selects, funds, manages and oversees contracts for direct service programs provided by 40-50 community-based organizations and two public agencies, serving persons 60 years of age and older and adults with disabilities. Service providers target younger adults with disabilities as well as frail seniors, low-income seniors, and cultural/racial/ethnic minority groups of elders. Participating agencies provide a wide range of programs and services, including nutrition, transportation, and bilingual/bicultural needs, to help keep clients healthy and living independently in the community.

Supplemental Security Income (SSI), January 2008

SSI is a Federal income supplement program designed to help aged, blind, and disabled people who have little or no income. It provides cash to meet basic needs for food, clothing, and shelter.

5.2. Findings

Gender. In all caseload data used, males represent the majority of SRO residents and the minority of non-SRO residents (see Table 17).

Data Source	SRO Residents: Percentage Male	Non-SRO Residents: Percentage Male
APS	63.3% (N=619)	39.4% (N=3,165)
IHSS	53.2% (N=2,374)	35.4% (N=18,380)
OOA	63.5% (N=1,164)	35.6% (N=13,564)

Data Source	SRO Residents: Percentage Male	Non-SRO Residents: Percentage Male
SSI	60.6% (N=5,758)	45.1% (N=43,236)

Table 17. Percentage Male among SRO Residents and Non-SRO Residents for APS, IHSS, OOA, and SSI recipients.

Age. In all caseload data used, SRO residents who receive services for seniors and the disabled were significantly younger than non-SRO residents (see Table 18).⁸⁶

Data Source	SRO Residents: Average Age (years)	Non-SRO Residents: Average Age (years)
SSI	62.3 (N=5,758)	65.7 (N=43,236)
IHSS	67.2 (N=2,374)	71.0 (N=18,380)
OOA	68.3 (N=1,164)	78.8 (N=13,564)
APS	63.4 (N=608)	72.7 (N=3,065)

Table 18. Average Age of SRO Residents and Non-SRO Residents for APS, IHSS, OOA, and SSI recipients.

Ethnicity. The ethnic composition of SRO residents differs across the three caseload data sources that provide this information (see Figure 28).⁸⁷ In all cases, about one-fifth are African-American and about 5-6% are Latino. Asian/Pacific Islanders make up almost half of IHSS recipients living in SROs, one-third of those who receive OOA services, and only 14% of those with reports of abuse. This trend reverses itself for Whites, who make up one fourth of IHSS recipients living in SROs, one-third of those who receive OOA services, and over half of those with reports of abuse.

⁸⁶ All differences are statistically significant, with $p < 0.001$. See Appendix B for program-specific age distribution histograms.

⁸⁷ See Appendix B for program-specific information about SRO residents' and non-SRO residents' ethnic compositions.

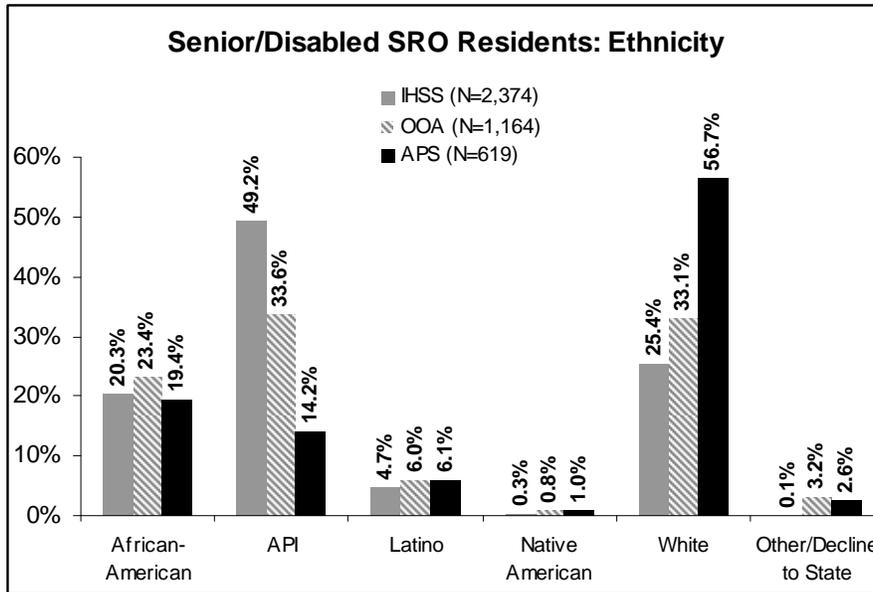


Figure 28. Senior/Disabled SRO Residents: Ethnicity

Language Spoken. Slightly over half of OOA recipients who live in SROs speak English as their primary language, a greater proportion than among non-SRO residents (see Figure 29).⁸⁸ Relative to all other OOA recipients, SRO residents include a smaller proportion of individuals whose primary language is Chinese, Spanish, or another non-English language.

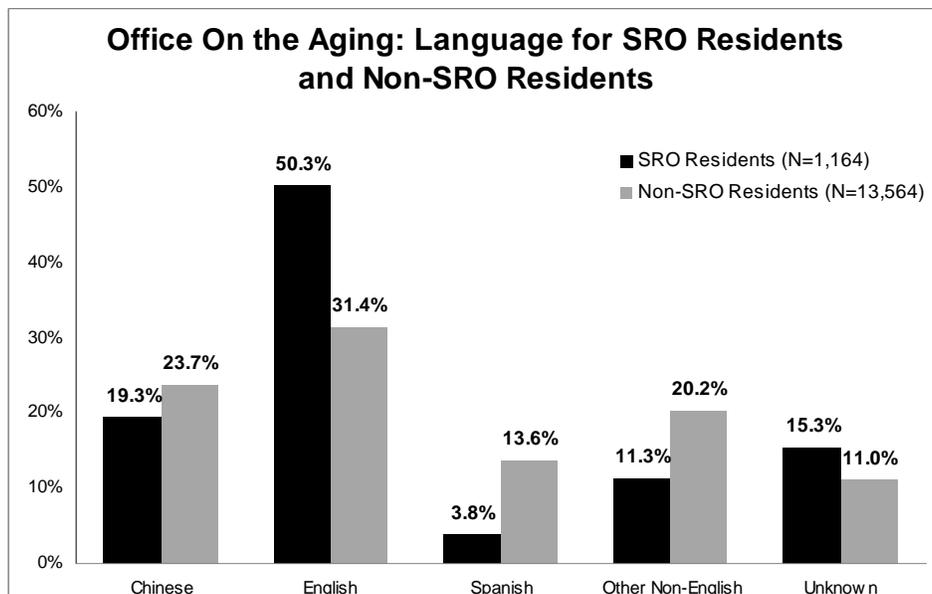


Figure 29. Office On the Aging: Language for SRO Residents and Non-SRO Residents.

Functionality. IHSS assigns clients a numeric ranking (one through six) that indicates their level of independence in specific functional areas. Table 19 below explains the meaning of each ranking.

⁸⁸ OOA is the only data source used that provides information about client language.

Rank	Definition
1	Independent—Able to perform functions without human assistance thought client may have difficulty. However, no completion of the task with or without a device poses a risk to his/her safety.
2	Able to perform but needs verbal assistance such as reminding, guidance or encouragement.
3	Can perform with some human help, i.e., direct physical assistance from the provider.
4	Can perform with a lot of human assistance.
5	Cannot perform function at all without human assistance.
6	Paramedical services needed.

Table 19. In-Home Supportive Services Functional Rank Definitions

According to IHSS rankings, SRO residents are *less* functionally limited in most areas than non-SRO residents (see Figure 30).

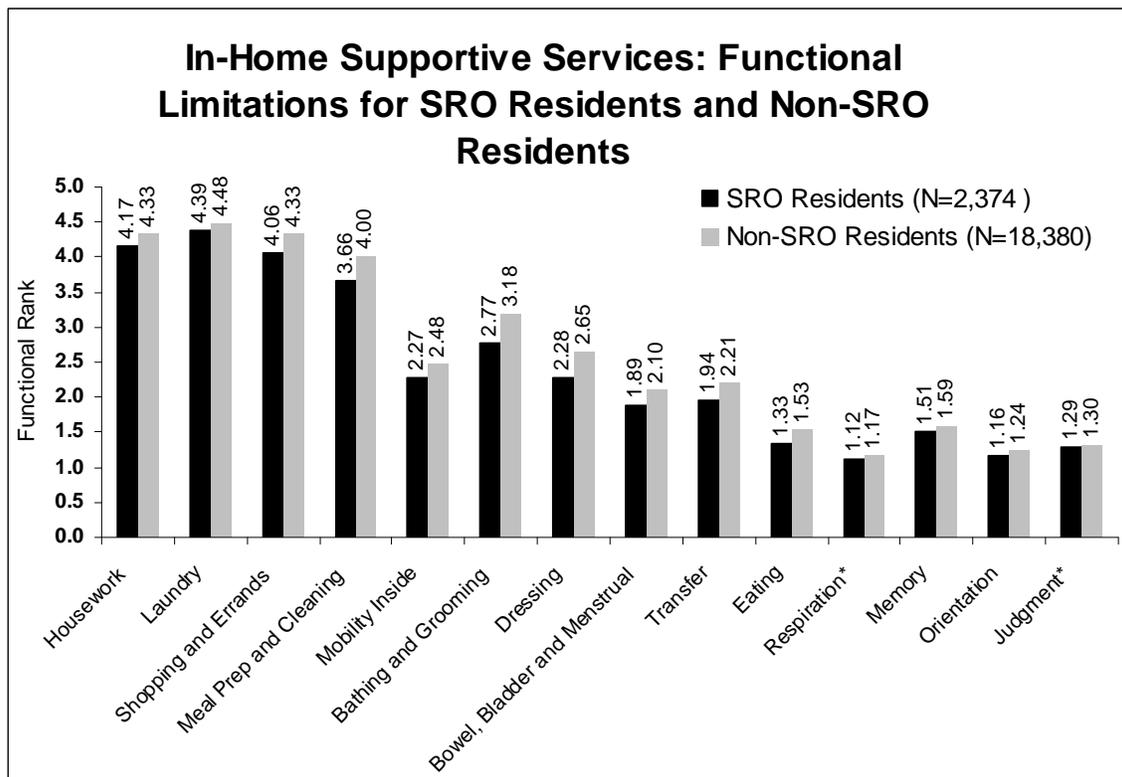


Figure 30. In-Home Supportive Services: Functional Limitations for SRO Residents and Non-SRO Residents.
 *All differences are statistically significant with $p < 0.001$, except Respiration ($p = 0.003$) and Judgment ($p = 0.7$)

IHSS also provides an overall functional index that indicates clients' relative need for services. As with the individual rankings, one indicates the lowest level of need and five indicates the highest. The mean overall functional index for SRO residents is 2.56 and the

mean for non-SRO residents is 2.81.⁸⁹ Here as well, SRO residents tend to be *less* functionally limited than non-SRO residents.

Employment, Relationship, and Veteran Status. OOA classifies program participants into mutually exclusive categories that reflect employment, relationship, and veteran status.⁹⁰

About one third of SRO residents who participate in OOA services are retired and one-fifth are disabled (see Figure 31). Relative to non-SRO residents, a greater proportion of SRO residents who participate in OOA services is disabled or unemployed, and a smaller proportion is retired or works full- or part-time.

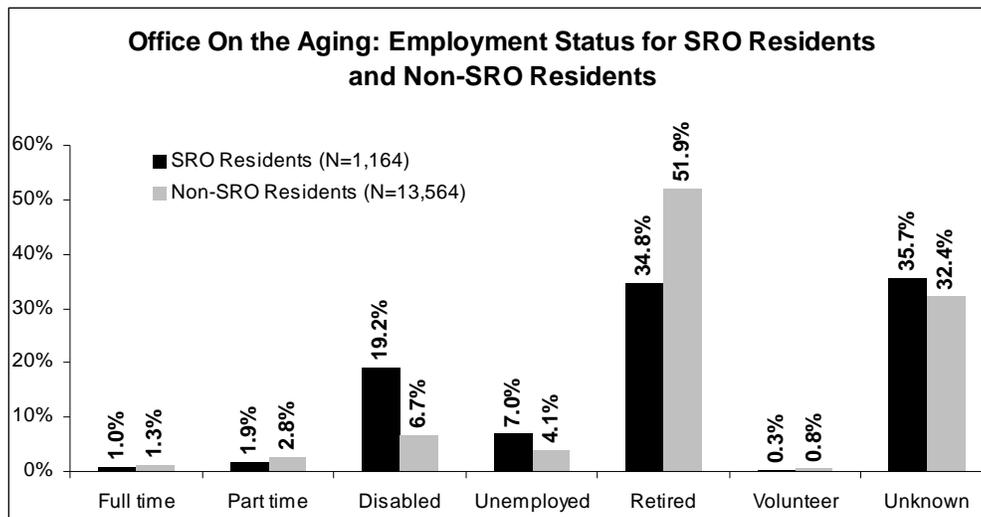


Figure 31. Office On the Aging: Employment Status for SRO Residents and Non-SRO Residents.

Among OOA participants, two thirds of those who live in SROs are either single (never married), divorced, or widowed, while the majority of non-SRO residents are married or widowed (see Figure 32).

⁸⁹ This difference is statistically significant, with $p < 0.001$. See Appendix B for an overall functional index histogram for SRO residents and non-SRO residents.

⁹⁰ In practice, individuals may fall into more than one category (e.g., disabled and retired).

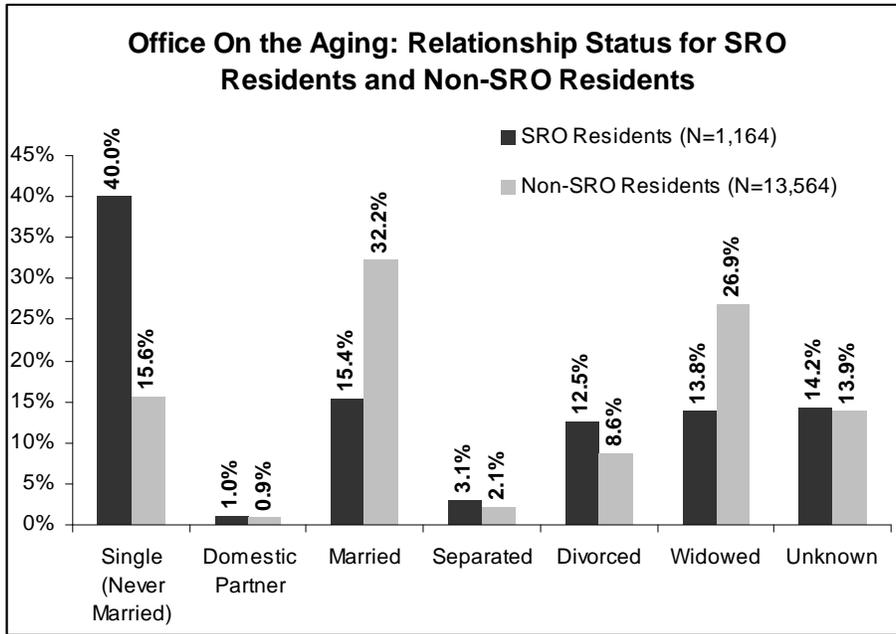


Figure 32: Office On the Aging: Relationship Status for SRO Residents and Non-SRO Residents.

The proportion of SRO residents that are veterans (13.6%) is more than twice that of non-SRO residents (see Figure 33).

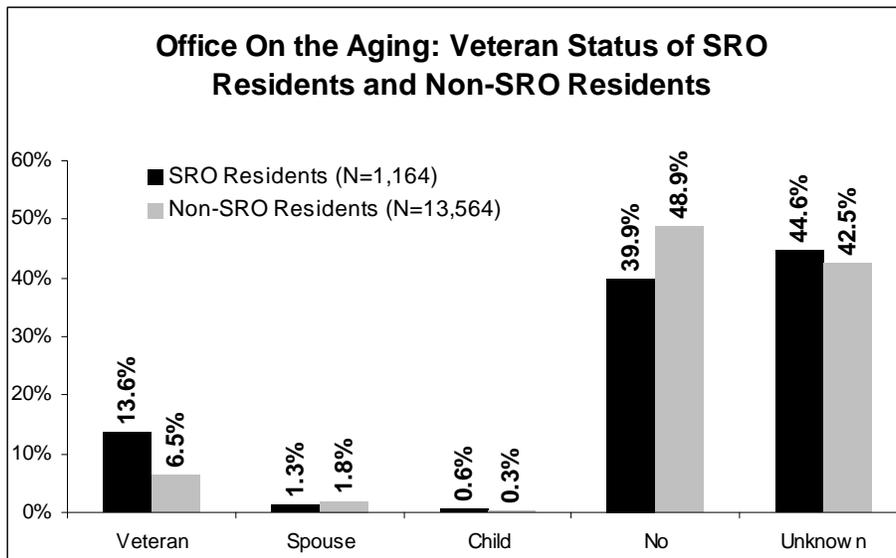


Figure 33. Office On the Aging: Veteran Status of SRO Residents and Non-SRO Residents.

Living Situation. Close to three-fourths of IHSS and OOA participants who reside in SROs live alone (see Table 20).⁹¹

	Independent (Lives Alone)	Shared (Does Not Live Alone)	Other / Unknown
IHSS (N=2,374)	71.1%	27.8%	1.1%
OOA (N=1,164)	71.7%	18.3%	10.0%

Table 20. Seniors/Disabled SRO Residents: Living Situation.

The proportion of IHSS recipients who live in SROs that have a stove or refrigerator at their residence is much lower than that of non-SRO residents (see Table 21).

IHSS Participants	SRO Residents (N=2,374)	Non-SRO Residents (N=18,380)
Stove in Residence	46.5%	97.6%
Refrigerator in Residence	68.1%	98.6%

Table 21. IHSS Participants with Stove or Refrigerator in Residence, SRO vs. non-SRO.

Abuse. According to APS caseload data, SRO residents display a greater tendency to be reported for self-abuse, while non-SRO residents are more likely to be reported for abuse by others (see Figure 34).

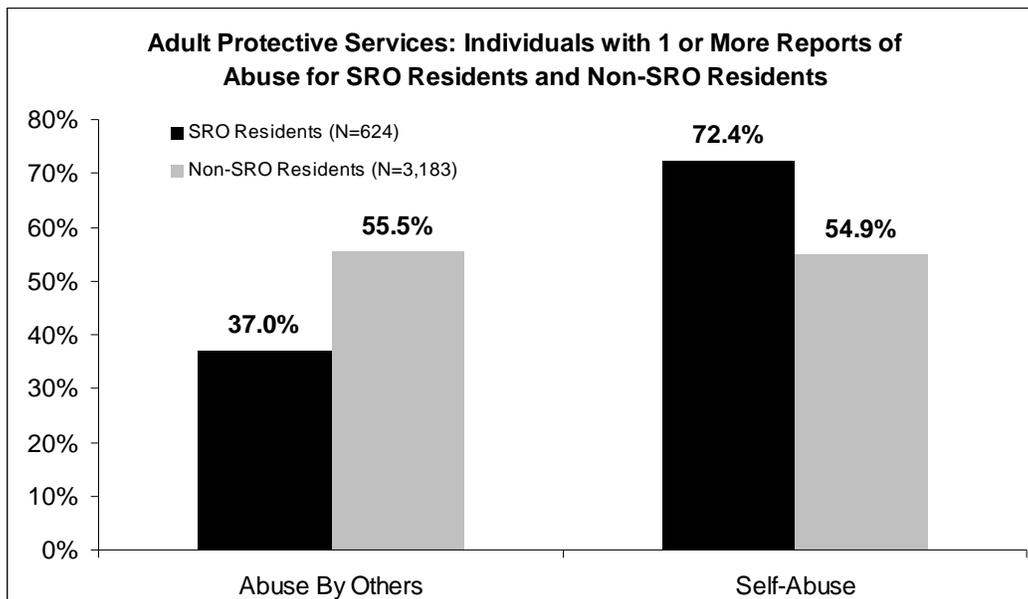


Figure 34. Adult Protective Services: Individuals with 1 or More Reports of Abuse for SRO Residents and Non-SRO Residents.

⁹¹ Appendix B contains program-specific comparisons of SRO residents and non-SRO residents.

Compared to non-SRO residents, SRO residents have a smaller proportion of alleged financial abuse and neglect by others, and a larger proportion of alleged self-abuse in the areas of health, malnutrition, medical, and physical (see Figure 35).⁹²

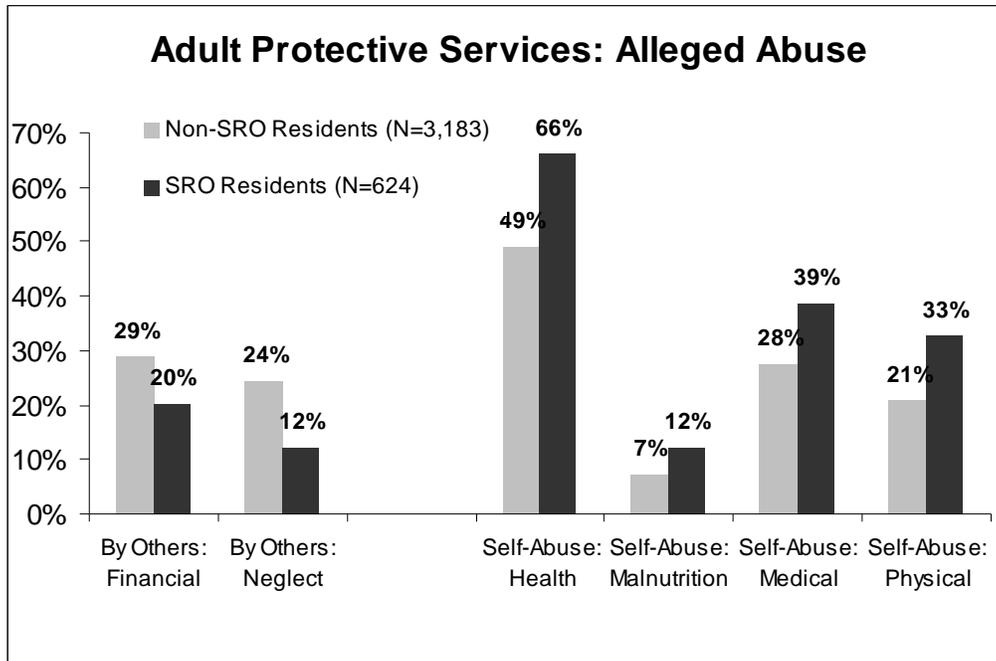


Figure 35. Adult Protective Services Alleged Abuse for Non-SRO Residents and SRO Residents.

Additional Issues. Many seniors who live in SROs have multiple challenges such as mobility limitations, mid-range dementia, and/or forgetfulness, and may need on-site or readily accessible case managers. American Disabilities Act (ADA) code enforcement can be a concern for this population. One service provider noted that some residents, especially those in Chinatown SROs, may choose not to call attention to code enforcement because they do not speak English or want to avoid conflict. Other concerns for seniors and the disabled who live in SROs include buildings with long flights of stairs, some without rails, coupled with a lack of functional elevators, and few lifeline buttons in SRO units. Some advocates stress the need for more senior-only housing options.

⁹² See Appendix B for additional APS data about SRO residents and non-SRO residents.

6. Children and Families

6.1. Data Sources

California Work Opportunities and Responsibility to Kids (CalWORKS) / Temporary Assistance for Needy Families (TANF) (CalWIN database) January 2009 and December 2006

The CalWORKs program provides temporary financial assistance and employment-focused services to families with children who have income and property below State maximum limits for their family size. Most able-bodied aided parents are also required to participate in the CalWORKs employment services program.

Child Welfare Services Case Management System, 2004-2008

The information in this section describes child abuse data from the Child Welfare Services Case Management System (CWS CMS) for all San Francisco addresses from 2004-2008 (inclusive). Often, more than one referral, removal and/or placement is associated with an individual child. For this report, duplicate entries for a single child were removed, such that the numbers given here refer to individual children, not unique incidents.⁹³

Department of Public Health (DPH), 2008 Calendar Year

DPH matched SRO addresses against its records for medical, mental health, and substance abuse treatment services during calendar year 2008. Aggregated data was provided at the neighborhood level.

First 5 San Francisco, Program Year 2008-2009

First 5 San Francisco was established in 2000 as part of the statewide First 5 California movement to assist public agencies, non-profit organizations and families in supporting early education, pediatric healthcare, family support and systems change. Grantees include Compass Family Services, Good Samaritan Family Resource Center, and Portola Family Connections.

San Francisco Unified School District, April 13, 2009

The San Francisco Unified School District (SFUSD) matched SRO addresses against all public school students, pre-kindergarten through 12th grade. Aggregated data was provided at the neighborhood level.

Subsidized Child Care, March 11, 2009

Children's Council of San Francisco provides free child care referrals and child care subsidy assistance to low-income parents and supports licensed and legally license-exempt child care. SRO addresses were matched against subsidized child care recipients and providers.

6.2. Findings

Neighborhood. According to SFUSD data, Chinatown contains the largest number of children living SROs, followed by the Tenderloin (see Table 22). SROs in SOMA, the Mission, and other neighborhoods have far fewer children.

⁹³ In these cases, substantiated referrals were kept in favor of unsubstantiated referrals.

Neighborhood	Number of Children with SRO Addresses
Chinatown	512
Tenderloin	288
SOMA	37
Mission	33
Other	40
Total	910

Table 22. Number of Children with SRO Addresses, by Neighborhood.

Age. SFUSD children with SRO addresses are relatively evenly distributed across grade levels, pre-kindergarten through 12th (see Figure 36).⁹⁴

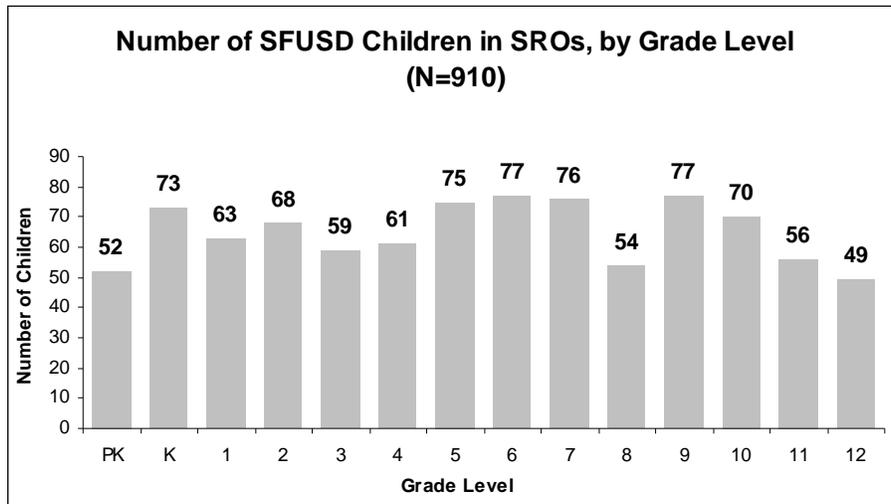


Figure 36. Number of SFUSD Children in SROs, by Grade Level.

In December 2006, there were 192 CalWORKS recipients living in SROs.⁹⁵ This number decreased to 160 in January 2009. Figure 37 shows the age distribution of January 2009 CalWORKS recipients living in SROs, who are members of families with minor children.

⁹⁴ See Appendix B for grade level distribution by neighborhood.

⁹⁵ This number reflects individuals, not households.

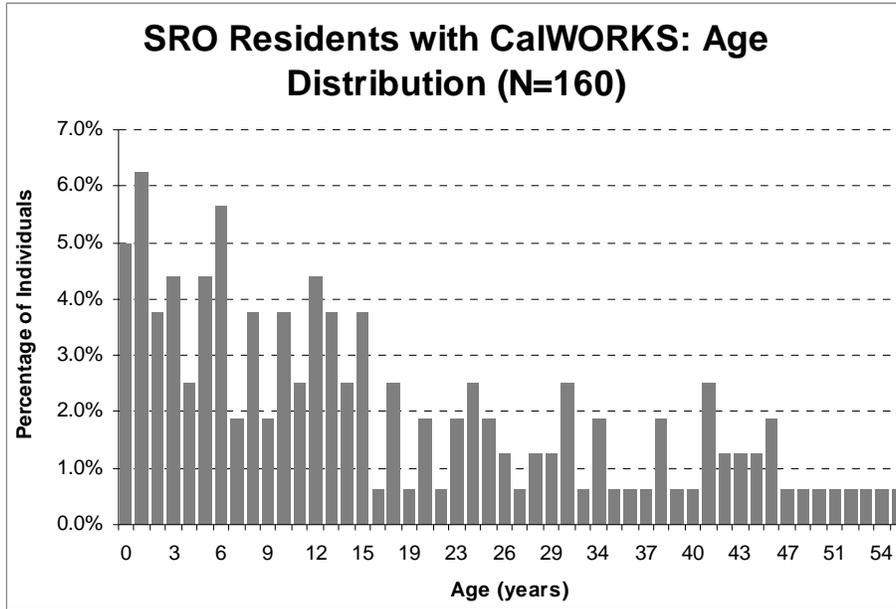


Figure 37. SRO Residents with CalWORKS: Age Distribution.

With respect to child welfare, a relatively large number of child abuse referrals were made for babies (i.e., under one year old) living in SROs between 2004 and 2008, over half of which were substantiated (see Figure 38). While a large number of referrals for school-age children (i.e., over five years old) was also made during this time period, a smaller proportion of those referrals were substantiated.

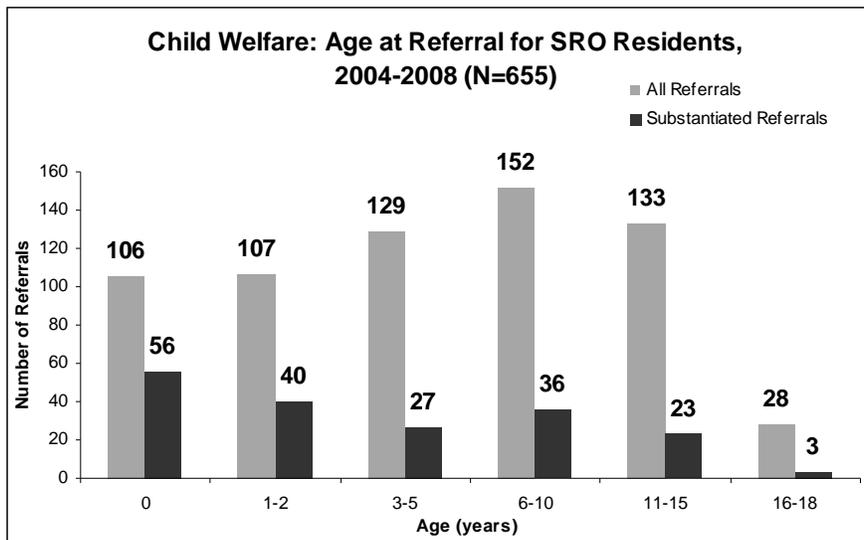


Figure 38. Child Welfare: Age at Referral for SRO Residents, 2004-2008.

Ethnicity. Given that most SFUSD children with SRO addresses live in Chinatown, it is not surprising that the bulk of these children (59%) are Chinese (see Figure 39).⁹⁶

⁹⁶ See Appendix B for neighborhood-specific ethnicity data.

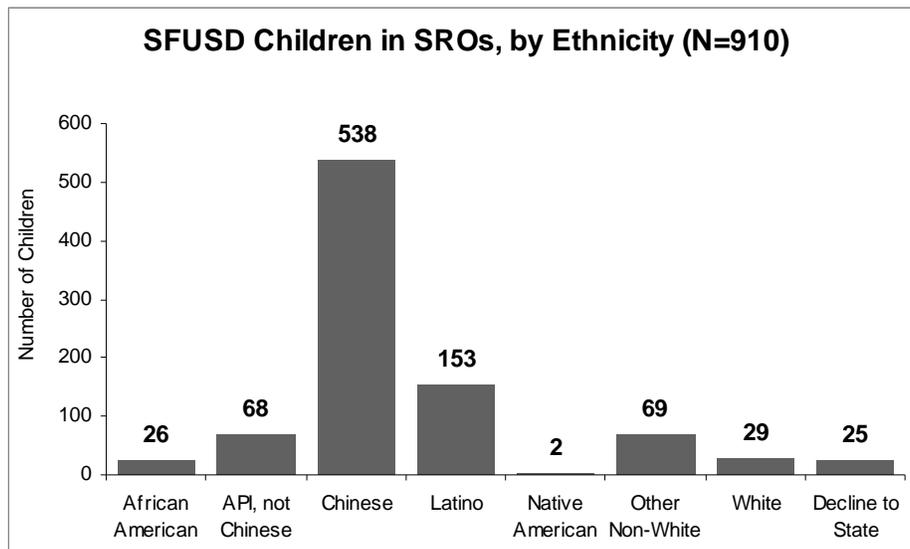


Figure 39. SFUSD Children in SROs, by Ethnicity.

Although most school-age children who live in SROs are Chinese, the greatest proportions of child abuse referrals among SRO residents between 2004 and 2008 were made for African-Americans and Latinos (see Table 23).⁹⁷

	African-American	API	Latino	Native American	White	Unknown
Percentage of Total Child Welfare Referrals with SRO Addresses, 2004-08 (N=655)	29.8%	18.9%	24.7%	1.1%	20.6%	4.9%

Table 23. Percentage of Total Child Welfare Referrals with SRO Addresses, 2004-08.

Between 2005 and 2008, the total number of child welfare referrals made for SRO residents decreased by about one-third (see Figure 40). In 2004, Latinos made up the largest proportion of child abuse referrals. Between 2005 and 2007, African-Americans displayed the largest share of referrals, and in 2008, Asian/Pacific Islander and White children each made up about one quarter of referrals.

⁹⁷ See Appendix B for ethnicity information for substantiated referrals.

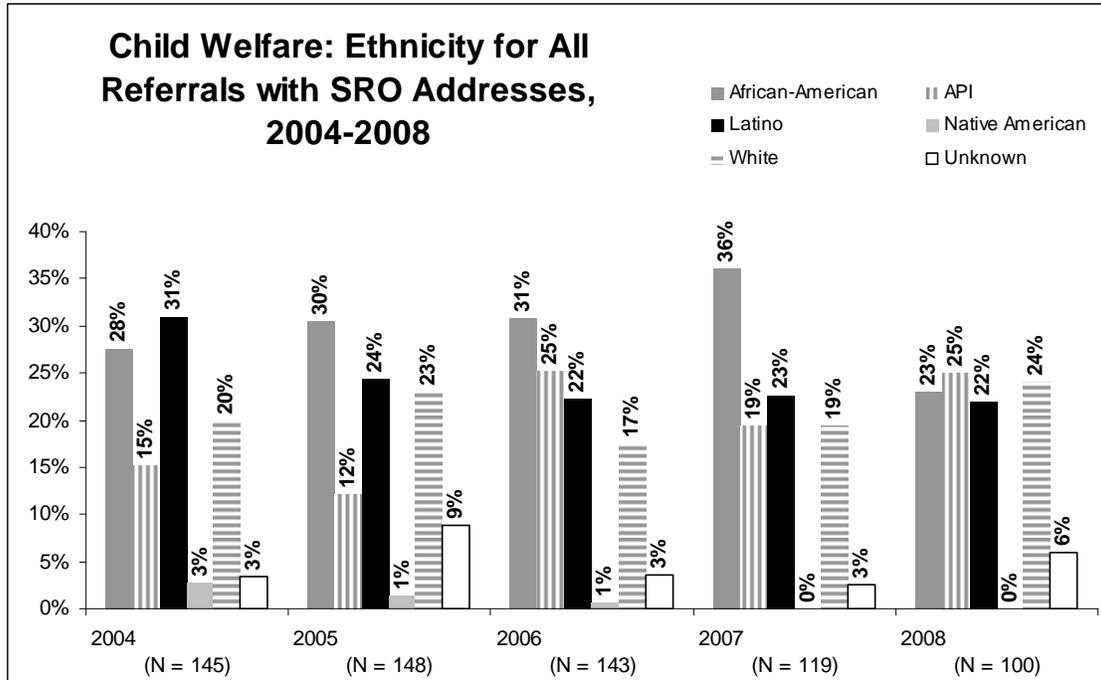


Figure 40. Child Welfare: Ethnicity for All Referrals with SRO Addresses, 2004-2008.

Language. Overall, 60% of SFUSD children in SROs have English Language Learner (ELL) status (see Figure 41). Since Chinatown and the Mission have large immigrant populations, it is expected that these neighborhoods' SROs also have the highest proportion of ELL children. The large percentage of ELL children in Tenderloin SROs (50%) probably indicates the presence of immigrant families.

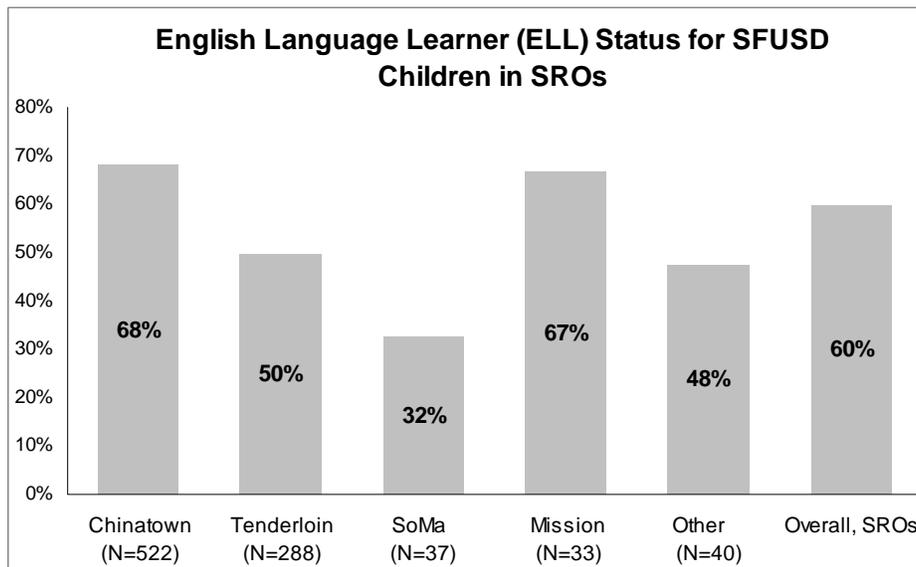


Figure 41. English Language Learner (ELL) Status for SFUSD Children in SROs.

Special Education, Testing Proficiency, Free/Reduced Lunch. In aggregate, the proportion of children with special education status in SROs is the same as the proportion districtwide (see

Figure 42). However, this number varies greatly across neighborhoods. South of Market SROs have the highest percentage of special education students (22%), while Chinatown has the lowest (4%).

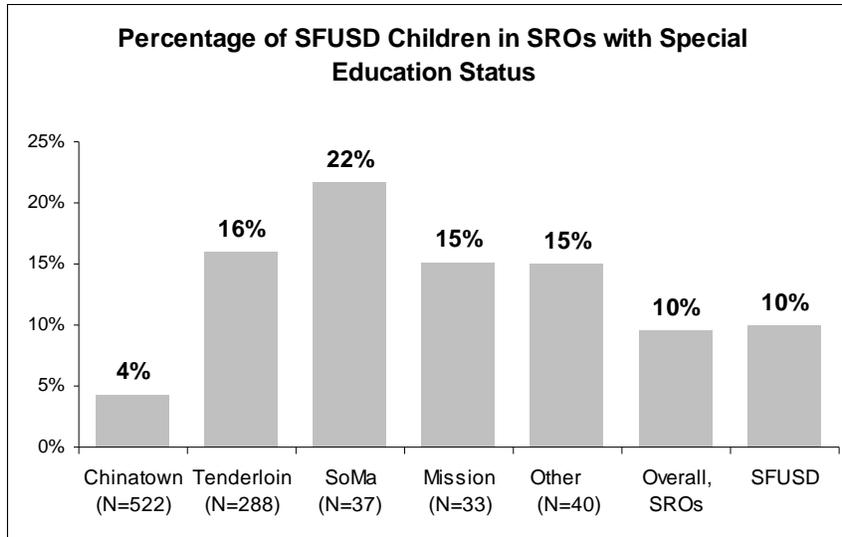


Figure 42. Percentage of SFUSD Children in SROs with Special Education Status.

Fifty-three percent of all SFUSD children in SROs test as “proficient” (see Figure 43). Children who live in the Mission’s SROs have the highest proportion that tests “proficient”, while SOMA and the Tenderloin have the lowest.

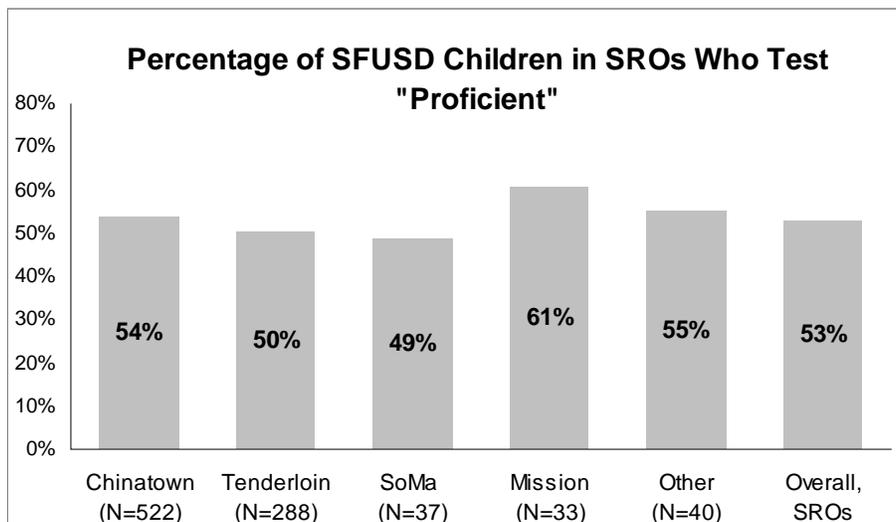


Figure 43. Percentage of SFUSD Children in SROs Who Test “Proficient”

Free/reduced lunch status is a proxy for poverty among school-age children. It is therefore not surprising that the proportion of SFUSD children in SROs who receive free/reduced lunch is much greater than the districtwide average of 53% (see Figure 44). Chinatown SROs have the highest proportion of children who receive free/reduced lunch, and SROs in “other” neighborhoods have the lowest proportion.

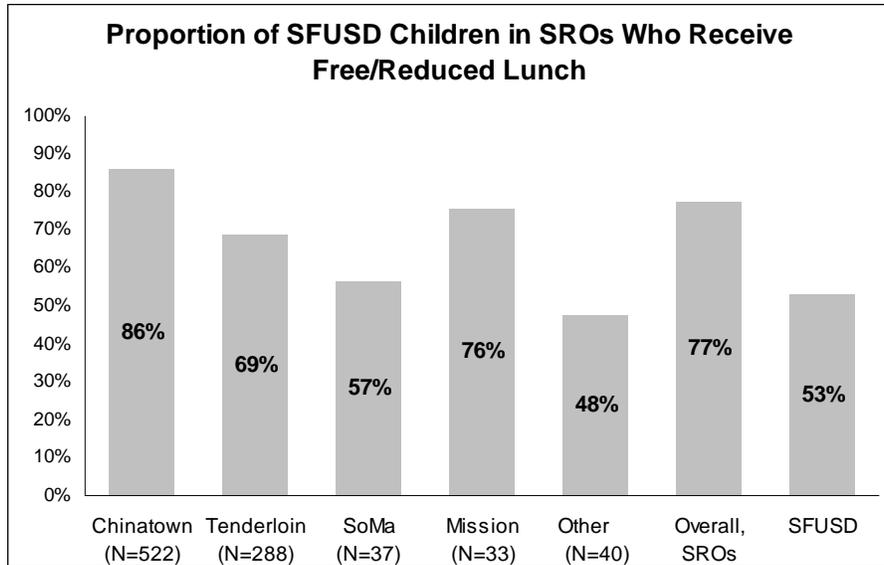


Figure 44. Proportion of SFUSD Children in SROs Who Receive Free/Reduced Lunch.

Health Care. DPH provided information about medical service usage (i.e., primary care, emergency department and inpatient services) and mental health service usage for SRO residents under 18 years old.⁹⁸

Among SRO residents, Chinatown’s youth used 63% of the total primary care visits made to public health clinics in 2008, and those in the Tenderloin used 24% of the total (see Figure 45). SOMA and the Mission used smaller proportions of these primary care visits among children who live in SROs.

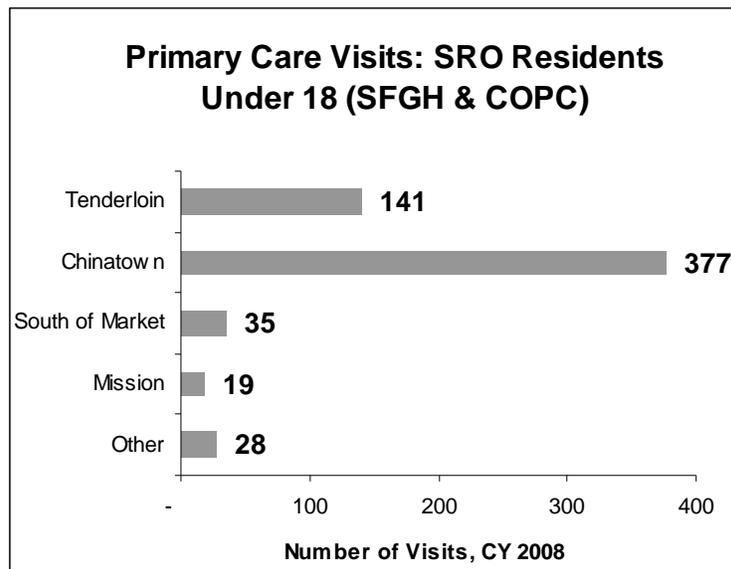


Figure 45. Primary Care Visits: SRO Residents Under 18 (SFGH & COPC).⁹⁹

⁹⁸ See Section on Public Service Utilization for DPH data about SRO residents over 18 years of age.

⁹⁹ SFGH: San Francisco General Hospital, COPC: Community Oriented Primary Care, PES: Psychiatric Emergency Services, PSY: Psychiatric.

Among children living in SROs, those in the Tenderloin made the most Emergency Department and inpatient service visits in 2008 (see Figure 46). Children who live in Chinatown's SROs made the next largest number of visits, and those in SOMA and the Mission show smaller numbers.

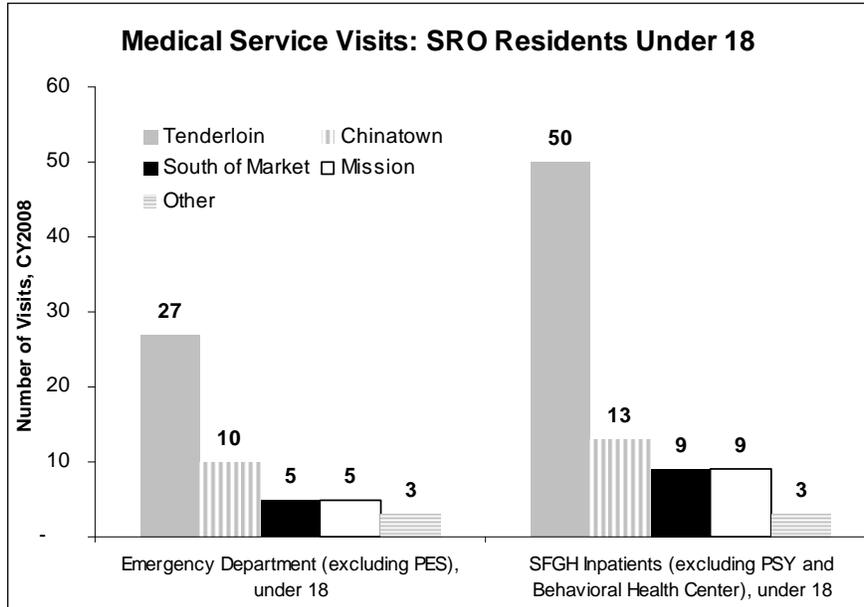


Figure 46. Medical Service Visits: SRO Residents under 18.

Chinatown leads in mental health service usage among SRO residents under 18, with 49% of the total, followed by the Tenderloin with 39% of the total (see Figure 47). The numbers for other neighborhoods and for crisis/emergency mental health service usage among SRO residents under 18 are much lower.

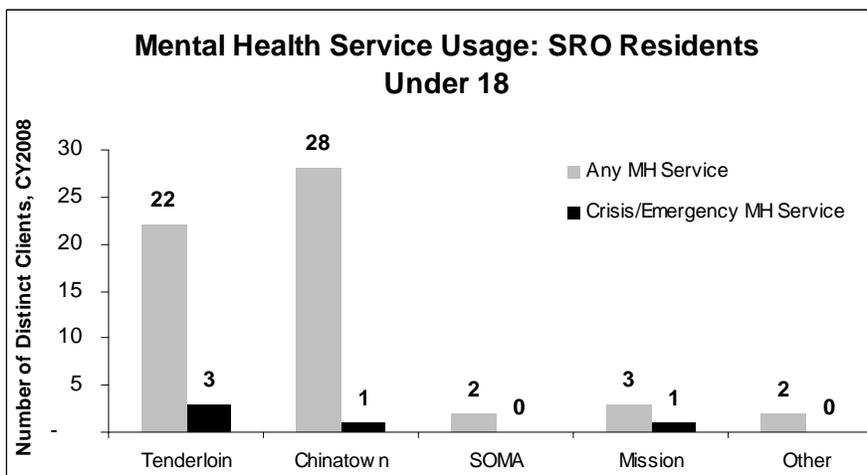


Figure 47. Mental Health Service Usage: SRO Residents Under 18.

Subsidized Child Care and First 5. Only a very small proportion of San Francisco's subsidized child care recipients (0.82%) and providers (1.43%) and First 5 program participants (0.8%)

correspond with SRO addresses (see Table 24).¹⁰⁰ Coupled with the substantial number of young children living in SROs, these numbers suggest low service uptake for these programs.

	Subsidized Child Care Recipients	Subsidized Child Care Providers	First 5 San Francisco
Percentage that are SRO Residents	0.82%	1.43%	0.81%
Number of SRO Residents	29	26	30
Number of Observations (N)	3,558	1,824	3,723

Table 24. Subsidized Child Care and First 5 San Francisco Participants with SRO addresses.
Data Source: Children’s Council of San Francisco (March 11, 2009) and First 5 San Francisco (PY 2008-9)

Child Abuse. Compared to non-SRO residents, children in SROs display a higher proportion of substantiated child abuse referrals (see Table 25).

	Total Number of Referrals	Number of Substantiated Referrals	Proportion of Referrals That Were Substantiated
Non-SRO residents	28,014	5,391	19.24%
SRO residents	655	185	28.24%
Total	28,669	5,576	19.45%

Table 25. Proportion of Referrals That Were Substantiated.

Relative to non-SRO residents and total child abuse referrals, SRO residents have a larger proportion of referrals made for caretaker absence/incarceration, emotional abuse, general/severe neglect, and substantial risk (see Figure 48a). On the other hand, a smaller proportion of the referrals for SRO residents were for being at risk of sibling abuse and for physical and sexual abuse, relative to non-SRO residents and total referrals (see Figure 48b).¹⁰¹

¹⁰⁰ First 5 San Francisco data probably represents fewer than 30 households, because each child and adult participant is counted separately.

¹⁰¹See Appendix B for figures on substantiated referrals

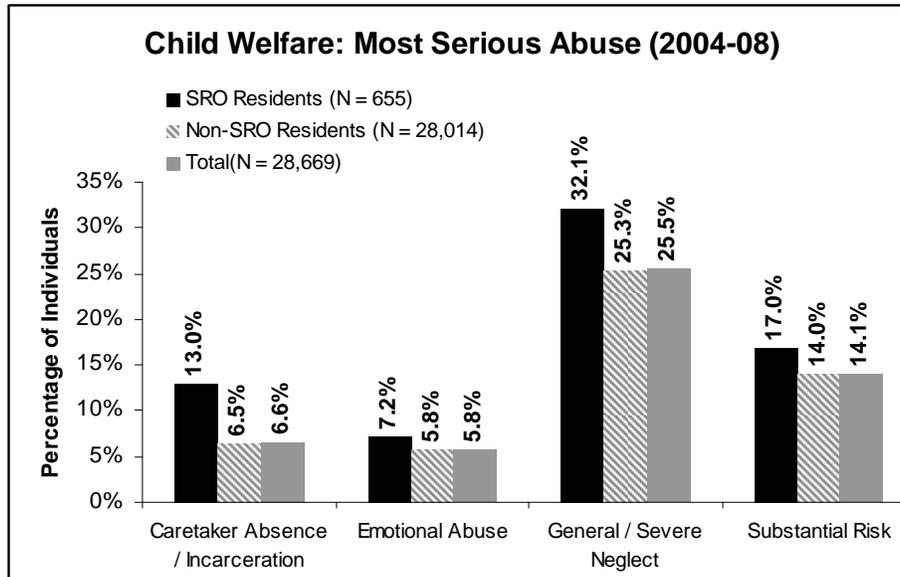


Figure 48a. Child Welfare: Most Serious Abuse (2004-08).

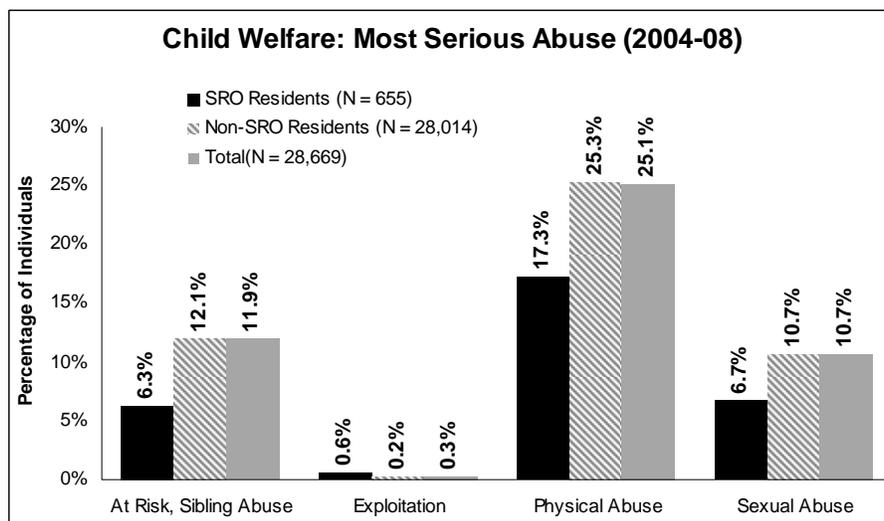


Figure 48b. Child Welfare: Most Serious Abuse (2004-08).

Additional Issues. Living in SROs is especially challenging for families and can lead to emotional stress, abuse, neglect, and mental health problems.¹⁰² One interviewee noted that the SROs are not family friendly and “children cannot be children”. Family boundaries and environmental health (e.g., shared bathrooms and kitchens) are of particular concern. Moreover, even when the building itself is safe, children who live in SROs are often exposed to unsafe conditions in the surrounding neighborhoods when going to and from school. Many advocates note the need for expanded support for this population, such as child care, homework space, and play space.

¹⁰² Families are not permitted to live in city-run SROs.

7. Public Service Utilization

7.1. Data Sources

County Adult Assistance Programs (CAAP) (CalWIN Database), January 2009

CAAP serves very low-income San Francisco adult residents without dependents through four programs: Personal Assisted Employment Services (PAES), Supplemental Security Income Pending (SSIP), Cash Assistance Linked to Medi-Cal (CALM), and General Assistance (GA). These four programs, which are unique to San Francisco, were created to provide more opportunities to engage those individuals formerly served only by GA, the most basic financial safety net. CAAP determines eligibility and issues benefits to clients who are not eligible for other state or federal cash aid programs.

Department of Public Health (DPH), 2008 Calendar Year

DPH matched SRO addresses against its records for medical, mental health, and substance abuse treatment services during calendar year 2008. Aggregated data was provided at the neighborhood level.

Food Stamps (CalWIN Database), January 2009

The Food Stamp Program is a federally-mandated, state-supervised, and county-operated government program designed to eliminate hunger. Food Stamp benefits help low-income families and individuals improve their health by providing access to a nutritious diet. Income limits and financial resource levels establish eligibility for food stamp benefits. Most people enrolled in CalWORKs or CAAP are eligible.

Medi-Cal (CalWIN Database), January 2009

Medi-Cal provides health and long-term care coverage to low-income children, their parents, elderly, and disabled Californians. It is the largest source of federal funds to California.

7.2. Findings

Gender. The majority of SRO residents who receive CAAP, Food Stamps, and/or Medi-Cal are males (see Table 26). Males make up just over half of Medi-Cal recipients, about two-thirds of Food Stamps recipients, and over three-fourths of CAAP beneficiaries.

SRO Residents	Percentage Male	Percentage Female
CAAP (N=1,520)	77.6%	22.4%
Food Stamps (N=2,431)	67.3%	32.7%
Medi-Cal (N=4,751)	50.8%	49.2%

Table 26. Gender Measures for CAAP, Food Stamps, and Medi-Cal recipients.

Age. The mean and median ages of CAAP, Food Stamps, and Medi-Cal recipients who live in SROs range from 43 to 55 years (see Table 27).¹⁰³

¹⁰³ See Appendix B for program-specific age distribution histograms.

Program	Mean Age (years)	Median Age (years)	Standard Deviation
CAAP (N=1,520)	48.4	50	10.4
Food Stamps (N=2,431)	43.2	48	17.9
Medi-Cal (N=4,571)	50.8	55	27.3

Table 27. Age Measures for CAAP, Food Stamps, and Medi-Cal recipients.

Ethnicity. The ethnic composition of SRO residents who receive public assistance differs across programs (see Figure 48). African-Americans and Whites each make up slightly over one-third of CAAP recipients. Food Stamps recipients are relatively evenly distributed among African-Americans, Asian/Pacific Islanders, and Whites. Almost two-thirds of Medi-Cal recipients who live in SROs are Asian/Pacific Islanders, with much smaller percentages of African-Americans, Latinos, and Whites.

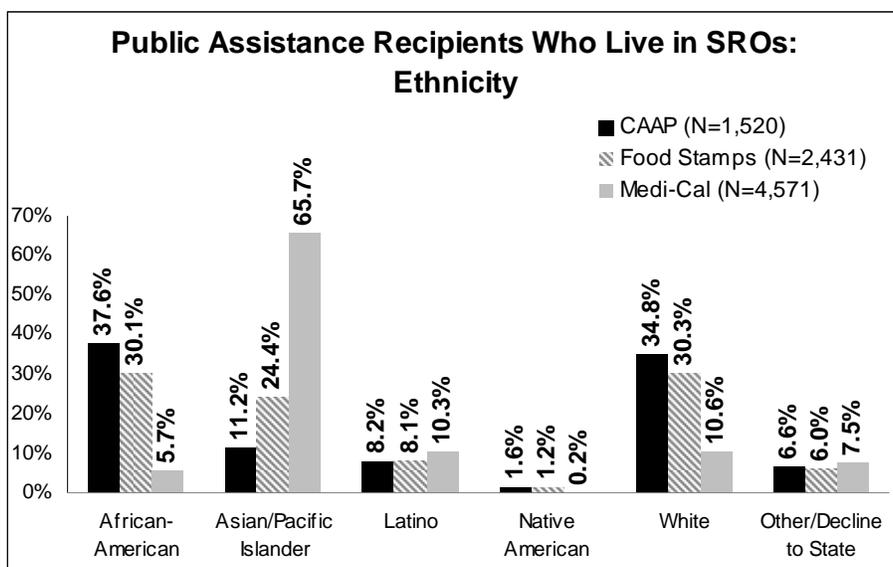


Figure 48. Public Assistance Recipients Who Live in SROs: Ethnicity.

Language. The primary language of SRO residents who receive public assistance also differs across programs (see Figure 49). The overwhelming majority of CAAP and Food Stamps recipients who live in SROs speak English as their primary language. However, Chinese is the primary language of just over half of SRO residents with Medi-Cal, and English is the primary language of about one-third of this population.

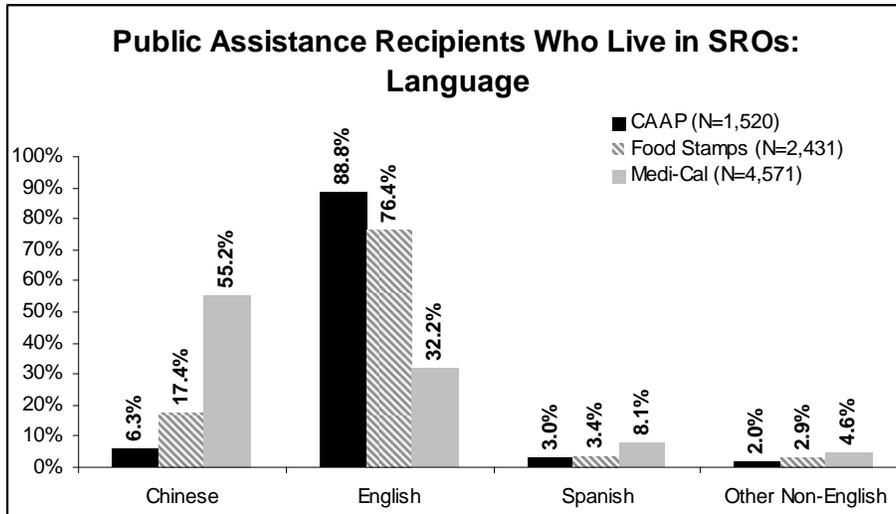


Figure 49. Public Assistance Recipients Who Live in SROs: Language.

Medical Services. DPH generated information about primary care medical service utilization by SRO residents at San Francisco General Hospital (SFGH) and Community Oriented Primary Care (COPC) clinics¹⁰⁴ during the 2008 calendar year. Among SRO residents 18 and older, those in the Tenderloin use the largest portion (62%) of total primary care visits (see Figure 50). South of Market’s SRO residents used the next largest portion of the total (17%), and those in Chinatown and the Mission made still less primary care medical visits.

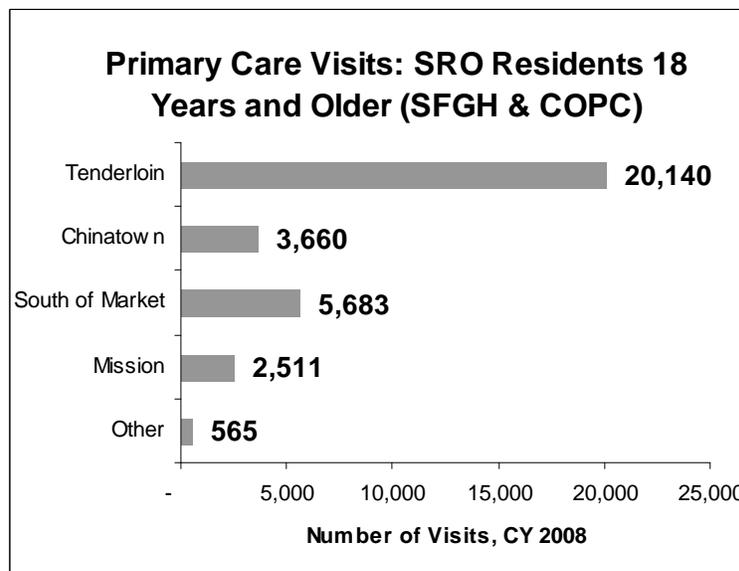


Figure 50. Primary Care Visits: SRO Residents 18 Years and Older (SFGH & COPC).

¹⁰⁴ In addition to offering these services at San Francisco General Hospital (SFGH), DPH operates a network of 18 Community Oriented Primary Care (COPC) clinics throughout San Francisco. COPC clinics offer a broad array of primary care and mental health services including youth health, senior health, infectious disease, and family planning.

DPH also provided information about SRO residents' utilization of the following medical services (see Figure 51):

- i) Emergency Department (ED), excluding Psychiatric Emergency Services (PES)
- ii) SFGH Inpatients, excluding Psychiatric (PSY) and Behavioral Health Center (BHC)
- iii) SFGH Urgent Care

For all three types of services, among SRO residents 18 years and older, those in the Tenderloin made the greatest number of visits in 2008, followed by South of Market, Mission, and Chinatown.

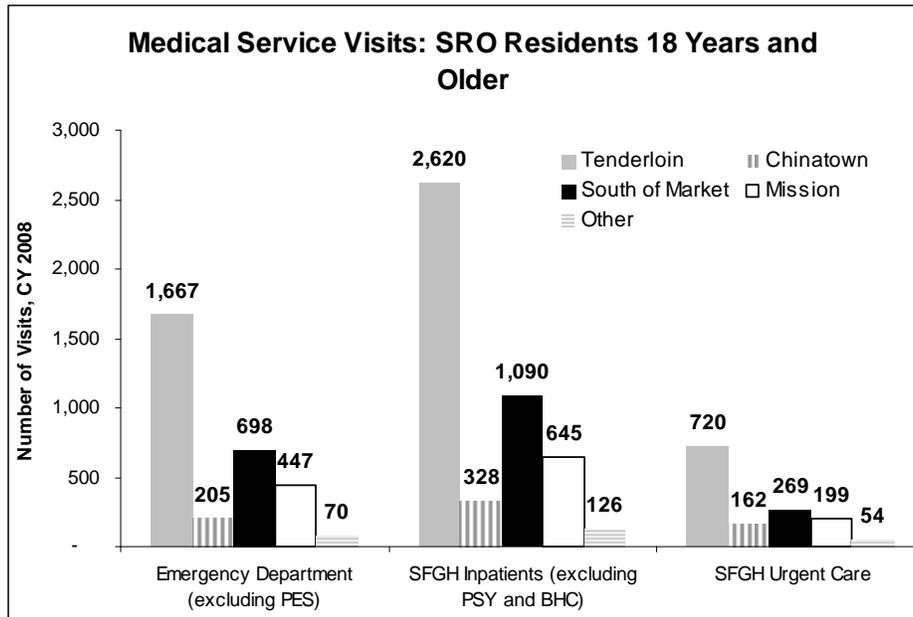


Figure 51. Medical Service Visits: SRO Residents 18 Years and Older.

Mental Health Services. People living in the Tenderloin's SROs used over half (56%) of the total mental health services used by SRO residents in 2008 (see Figure 52). South of Market's SRO residents used the next largest proportion (22%), followed by Chinatown and the Mission. In the same manner, Tenderloin SRO residents used over half (55%) of the total crisis/emergency mental health services, and individuals in South of Market's SROs used one-fourth, with smaller numbers in the Mission and Chinatown. A similar pattern emerges among only those SRO residents who are 18 years old and over.¹⁰⁵

¹⁰⁵ See Appendix B.

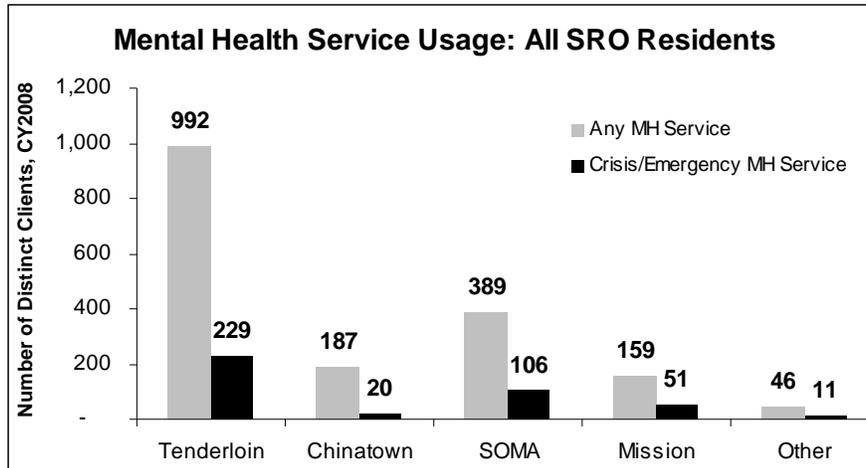


Figure 52. Mental Health Service Usage: All SRO Residents

Substance Abuse Treatment Programs. Out of the 714 distinct clients living in SROs that utilized substance abuse treatment programs in 2008, over half lived in the Tenderloin’s SROs, about one-fourth in South of Market’s SROs, and about one-tenth in the Mission (see Figure 53).¹⁰⁶

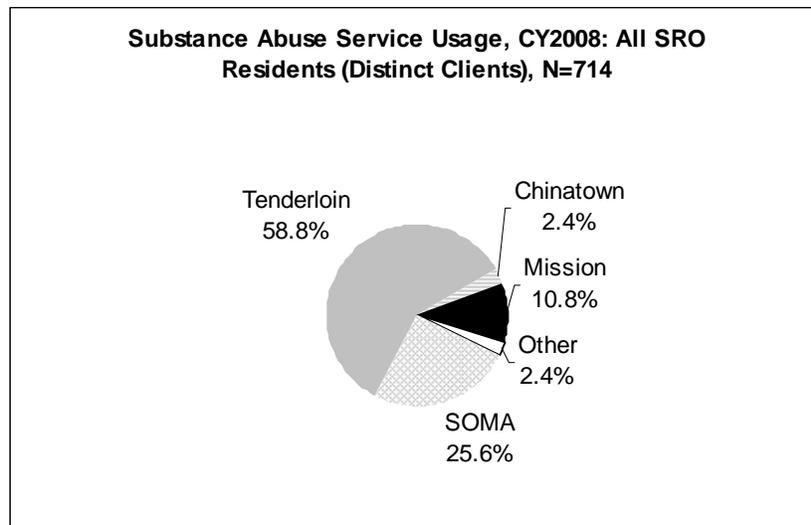


Figure 53. Substance Abuse Service Usage, CY 2008: All SRO Residents (Distinct Clients).

Additional Issues. One interviewee asserted that provision of support services for SRO residents is mostly a capacity issue, stressing the need to expand existing services rather than create new ones.

While SRO rent is relatively low by San Francisco standards, public assistance alone rarely covers the full monthly rent, and accumulating enough savings to move out can take a long time. Although Care Not Cash recipients are housed, many of them still have no job, no savings, and no other source of income, and may continue to panhandle on the street. Some CAAP recipients are said to augment their income with under-the-table work, and some SSI

¹⁰⁶ Only three substance abuse treatment clients were under the age of 18 (2 in the Tenderloin and 1 South of Market).

beneficiaries take advantage of services such as hygiene kits, food pantries, and clothing vouchers. Still other SRO residents need money management services, but existing services can be oversubscribed. Moreover, those with limited English skills face constrained employment opportunities. One interviewee noted that some immigrants may prefer sending remittances home to spending their savings on higher, non-SRO rent.

The availability of fresh, nutritious food is another concern for SRO residents because they often do not have access to food storage or cooking facilities. One Tenderloin service provider noted that most food outlets in the area are liquor stores and there is no “real food.” Some buildings in that neighborhood have started food pantries in order to address this concern.

Other common needs for SRO residents that interviewees mentioned include substance abuse treatment and enforcement of tenants’ rights. HIV- positive SRO residents have their own service sphere that includes Catholic Charities and the AIDS Alliance.

8. Recommendations

8.1. Develop and use criteria to target specific SROs and populations of SRO residents for outreach.

SRO tenants are historically an “invisible” population, and the data suggest that many residents may not be taking full advantage of services for which they are eligible for a number of reasons (e.g., lack of awareness, misinformation). Moreover, many private SRO owners have a strong interest in addressing tenants’ needs, especially when they interfere with hotel operations (e.g., mental illness, substance abuse, hoarding and cluttering, criminal activities).¹⁰⁷ Targeting specific SROs and populations of SRO residents would enable service providers to reach more clients and residents to receive increased support services. Potential criteria for targeted outreach include:

- a. *Supplemental Security Income (SSI) recipients who do not receive In-Home Supportive Services (IHSS).* This study found that of the 5,758 SSI recipients living in SROs, just under one-third also receive IHSS (1,802 individuals, or 31.1%). All SSI recipients are income-eligible for IHSS, and many of them would likely benefit from caretaker services. According to this study’s data, the ten SROs with the greatest number of SSI recipients who do not receive IHSS are:¹⁰⁸

▪ xxx Eddy (87 residents who receive SSI but not IHSS)	▪ xxx Ellis (51 residents)
▪ xxx Turk (74 residents)	▪ xxx Sixth St. (51 residents)
▪ xxx Jones (69 residents)	▪ xxx Sixth St. (49 residents)
▪ xxx South Van Ness (69 residents)	▪ xxx Polk (48 residents)
▪ xxx Sixth St. (55 residents)	▪ xxx Turk (48 residents)

- b. *San Francisco Unified School District (SFUSD) children with free/reduced lunch who do not receive Food Stamps.* This study identified 704 school-age children living in SROs who receive free/reduced lunch and only 323 Food Stamps recipients in SROs under the age of 19. While some of these children may not be eligible (e.g., due to immigration status), those who do qualify would likely benefit from additional nutritional support.
- c. *Concentrations of Personal Assisted Employment Services (PAES) recipients, especially in the Tenderloin.* PAES recipients are employable adults, often in need of services such as psychological and vocational assessment, substance abuse and mental health counseling, expenses for work-related clothing, tools and supplies, and transportation assistance to and from work activities. SRO residents who receive PAES should be targeted by HSA’s Boyd Hotel Workforce Development Center in the Tenderloin, which offers services for formerly homeless individuals living in supportive housing units.
- d. *Concentrations of seniors and adults with disabilities.* The data suggest that many seniors and adults with disabilities are not accessing all the support services available to them.

¹⁰⁷ Conversation with Sam Patel, president of the San Francisco Independent Hotel Owners and Operators Association, on 5/7/09.

¹⁰⁸ Addresses not listed here because of confidentiality concerns. However, addresses were provided to HSA.

Consider using the Services Connection Program (SCP) as a model. The SCP aims to link older adults and adults with disabilities who live in public housing with services provided in the community. It is a collaboration between DAAS, the San Francisco Housing Authority (SFHA), resource centers for seniors and adults with disabilities, and community-based service providers.¹⁰⁹ According to this study’s master profile of SRO residents, the ten SROs with the greatest number residents aged 65 and over are:¹¹⁰

▪ xxx Eddy (300 residents aged 65 years or older)	▪ xxx Jones (185 residents)
▪ xxx Ellis (239 residents)	▪ xxx Polk (145 residents)
▪ xxx Turk (215 residents)	▪ xxx Washington (144 residents)
▪ xxx Stockton (202 residents)	▪ xxx Jackson (124 residents)
▪ xxx Ellis (202 residents)	▪ xxx Washington (123 residents)

e. *Concentrations of children and families.* Although SROs are generally not ideal homes for children and families, the data show that a number of children and families are nevertheless living in these hotels. Hotels with larger numbers of children and families should be targeted for on-site outreach for benefit screening, after-school activities (e.g., academic support, recreation), and exit strategies to more family-friendly housing. According to this study’s master profile of SRO residents, the ten SROs with the greatest number residents aged 18 and under are:¹¹¹

▪ xxx Belden (34 residents 18 years and under)	▪ xxx Polk (21 residents)
▪ xxx Washington (26 residents)	▪ xxx Grant (18 residents)
▪ xxx Washington (29 residents)	▪ xxx McAllister (17 residents)
▪ xxx Stockton (24 residents)	▪ xxx Sixth St. (17 residents)
▪ xxx Powell (23 residents)	▪ xxx Turk (17 residents)

8.2. Preserve SROs as affordable housing stock in San Francisco.

In 2004, as part of its 10-Year Plan to End Homelessness, San Francisco set a goal of creating 3,000 units to house the chronically homeless. While new construction may take years, San Francisco’s SROs already house more low-income people than the city’s public housing developments. Strategies such as master leasing can be mutually beneficial to owners, service providers, and residents. Owners benefit from a guaranteed income stream, service providers have the opportunity to offer on-site support and, according to the San Francisco Planning Department, “the transfer of residential hotels to effective non-profit housing organizations...ensure[s] permanent affordability, livability, and maintenance.”¹¹²

¹⁰⁹ See Appendix F for detailed information about the Services Connection Program.

¹¹⁰ Addresses not listed here because of confidentiality concerns. However, addresses were provided to HSA.

¹¹¹ Addresses not listed here because of confidentiality concerns. However, addresses were provided to HSA.

¹¹² San Francisco General Plan: Housing Element (2004)

8.3. Bring key stakeholders together to strategize about how to better serve low-income SRO residents.

Numerous city entities are already working with SRO residents.¹¹³ Establishing partnerships that promote information-sharing between city departments, community-based organizations, and hotel owners and residents is likely to increase the efficiency of service delivery by fostering collaboration and preventing the duplication of services. For example:

- *San Francisco Police Department (SFPD).* While some private SRO owners already work closely with local police,¹¹⁴ expanding and formalizing these partnerships would grant owners more direct access to police services while enabling police officers to better protect and serve the community. The San Francisco Housing Authority (SFHA), the next largest provider of affordable housing after SROs, has a Memorandum of Understanding (MOU) with the SFPD for community policing activities.
- *San Francisco HSA and community-based service providers.* While the data suggest that many SRO residents are already connected with HSA services (i.e., Department of Human Services (DHS) and Department of Aging and Adult Services (DAAS)), many more SRO residents would likely benefit from additional support. Establishing partnerships with social service providers would equip hotel owners with information about available services and more direct access to providers. Moreover, the HSA and community-based providers would have the opportunity to expand their client base. The SFHA has MOUs with DAAS and several nonprofits to provide support services for seniors and families.
- *SRO Commission and/or Resident Councils.* Establishing a formal setting in which tenants may voice their concerns and communicate with hotel owners and property managers provides an opportunity to foster mutual understanding and cooperation. The SFHA Commission, which includes two public housing residents, holds semi-monthly public forums. Public housing developments also have on-site resident councils.

8.4. Monitor changes in the SRO resident profile over time.

San Francisco's SRO population is constantly shifting, and the HSA and other service providers should identify changing trends in SRO residents' demographics and human service needs. Monitoring changes in the SRO population will help ensure the provision of appropriate services based on clients' needs. This report may be used as a baseline against which to measure changes.

¹¹³ City entities that work with SRO residents include: Department of Children Youth and Their Families, Department of Building Inspections, Department of Public Health, Human Services Agency, Police Department, San Francisco Unified School District According to Sam Patel, president of the San Francisco Independent Hotel Owners and Operators Association, a forum that includes many of these key stakeholders is planned for August or September 2009.

¹¹⁴ Conversation with Sam Patel, president of the San Francisco Independent Hotel Owners and Operators Association, 5/7/09.

Appendix A: Glossary of Terms and Acronyms

- APS:** Adult Protective Services. Assists all San Francisco elders (65 years and over) and adults with disabilities (18 to 64 years old) whose physical or mental condition restricts his/her ability to protect his/her rights who are abused or neglected or at risk of abuse or neglect. The abuse may be physical violence, sexual assault, financial exploitation, neglect by others or self, abandonment, or emotional harassment and intimidation. They provide short-term case management and crisis intervention services for victims, connecting the individuals to the services needed to stop the abuse and ensure their on-going safety. The focus is on maintaining individuals in their own homes. Services include: emergency shelter/in-home protection, counseling, and tangible services. The services are free and voluntary, individuals may refuse them.
- CAAP:** County Adult Assistance Program; serves very low-income San Francisco adult residents without dependents through four programs: Personal Assisted Employment Services (PAES), Supplemental Security Income Pending (SSIP), Cash Assistance Linked to Medi-Cal (CALM) and General Assistance (GA). These four programs, which are unique to San Francisco, were created to provide more opportunities to engage those individuals formerly served only by General Assistance, the most basic financial safety net. CAAP determines eligibility and issues benefits to clients who are not eligible for other state or federal cash aid programs. Homeless CAAP clients may receive housing, support services and smaller cash grants.
- CALM:** County Assistance Linked to MediCAL
- CalWIN:** CalWORKS Information Network; a integrated on-line, real-time automated system with 26 subsystems to support eligibility and benefits determination, client correspondence, management reports, interfaces and case management for public assistance programs. CalWIN supports programs including Cash Assistance Program for Immigrants (CAPI), California Work Opportunities and Responsibility to Kids (CalWORKS)/Temporary Assistance for Needy Families (TANF), Foster Care, Food Stamps, County Adult Assistance Programs (CAAP), Kinship Guardianship Assistance Payment (Kin-GAP), Medi-Cal, and Refugee Cash Assistance.
- CalWORKS:** California Work Opportunities and Responsibility to Kids; provides temporary financial assistance and employment-focused services to families with minor children who have income and property below State maximum limits for their family size.
- CLF:** Community Living Fund; launched in 2007, administered by the Department of Aging and Adult Services (DAAS) through Institute on Aging and seven partner organizations. CLF funds home and community-based services, or combination of goods and services, that will help individuals who are currently or at risk of being institutionalized. The program uses coordinated case management and purchase of services for vulnerable older adults and younger adults with disabilities.
- COPC:** Community Oriented Primary Care. DPH operates a network of 18 COPC clinics throughout San Francisco. COPC clinics offer a broad array of primary care and mental health services including youth health, senior health, infectious disease, and family planning.
- Cubicle hotel:** “These multistory buildings might contain as many as 400 cubicles for residents. The interior walls did not extend floor to ceiling, but left space for air to circulate. Chicken wire nailed across the top of the units prevented tenants from

climbing over. A single hanging bulb shed light on little more than bed, chair, and stand...Tenants paid just enough for personal privacy and security in the ‘cages,’ but not enough to escape the noise and stench of a shared atmosphere. As many as forty tenants might share the same toilet and bath.”¹¹⁵

DAAS: Department of Aging and Adult Services

DAH: Direct Access to Housing; provides permanent housing with on-site supportive services for approximately 400 formerly homeless adults, most of whom have concurrent mental health, substance abuse, and chronic medical conditions. **DBI:** Department of Building Inspection

DHS: Department of Human Services

DPH: Department of Public Health

Efficiency apartment: a dwelling unit containing one habitable room (California Department of Housing and Community Development); which has a minimum floor area of 150 square feet and which may also have partial kitchen or bathroom facilities (Section 17958.1 of the California Health and Safety Code)

Extended stays hotels: a fast-growing segment of the accommodations industry. Brands and properties have multiplied in the last decade. They offer furnished, well-equipped units, common facilities, and hotel services in dedicated buildings and complexes. As hotels, at a minimum, extended stays provide housekeeping services, change the linens (sheets and towels), collect trash, handle mail and messages, and provide at least some limited hours of reception services. Brands vie with each other by including “extras” in the price of the unit rental: free parking, free use of hotel facilities (pool, exercise room), shuttle buses, free prepared food (breakfast, dinner), concierge services, evening receptions. Unit style varies by brand, and within brand, by adaptations to local market and hotel legal standards because few jurisdictions recognize extended stays as the hybrids they are¹¹⁶

HSA: Human Services Agency; its mission is to promote well-being and self-sufficiency among individuals, families and communities in San Francisco. HSA was formed in 2004 with the merger of two previously existing city departments, the Department of Human Services (DHS) and the Department of Aging and Adult Services (DAAS).

IHSS: In-Home Supportive Services; a statewide publicly funded program providing personal assistance services to low-income people with chronic and disabling conditions who need such assistance to remain safely in their homes and engaged in their communities. In San Francisco, most consumers served by IHSS are over 65 years of age. The remainder are younger adults and a small number of children. In-Home Supportive Services include chore and house cleaning services as well as personal care, such as assistance with eating, bathing, dressing, and using the toilet. IHSS allows consumers to live safely at home, where they want to be, rather than in institutions.

Master leasing: a legal contract in which a third party (other than the actual tenant) enters into a lease agreement and is responsible for tenant selection and rental payments. Under “master leasing” a nonprofit or public agency leases multiple units of housing (could be scattered site units or a whole apartment building) from a landlord, and subleases the units to homeless or low-income tenants. By assuming the tenancy burden, the agency facilitates housing of clients who may not be able to maintain a lease on their own due to

¹¹⁵ Levinson (2004)

¹¹⁶ Brownrigg, 2006

poor credit, evictions, or lack of sufficient income. The landlord receives a certain monthly payment whether or not the units are occupied.

McKinney/Vento Homeless Assistance Act: (originally called the Stewart B. McKinney Homeless Assistance Act of 1987) this legislation created three U.S. Department of Housing and Urban Development (HUD) programs that can be used to develop permanent housing for homeless individuals and families with disabilities: the Shelter Plus Care program (S+C), the Supportive Housing Program (SHP), and the Section 8 Mod Rehab SRO Program. These three programs form the backbone of the Continuum of Care.¹¹⁷

OOA: Office on the Aging; selects, funds, manages and oversees contracts for direct service programs provided by 40-50 community-based organizations and two public agencies to serve persons 60 years of age and older and adults with disabilities 18 years of age and older.

PAES: Personally Assisted Employment Services; PAES recipients are employable adults, often in need of services such as psychological and vocational assessment, substance abuse and mental health counseling, expenses for work-related clothing, tools and supplies, and transportation assistance to and from work activities.

SFGH: San Francisco General Hospital

SSI: Supplemental Security Income; SSI is a Federal income supplement program designed to help aged, blind, and disabled people who have little or no income. It provides cash to meet basic needs for food, clothing, and shelter.

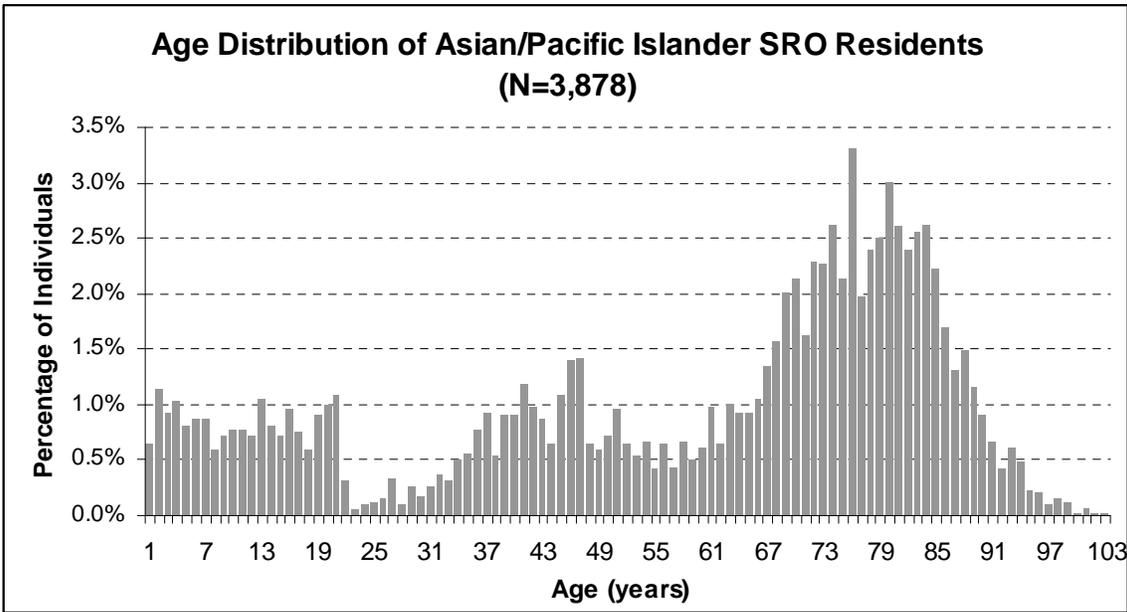
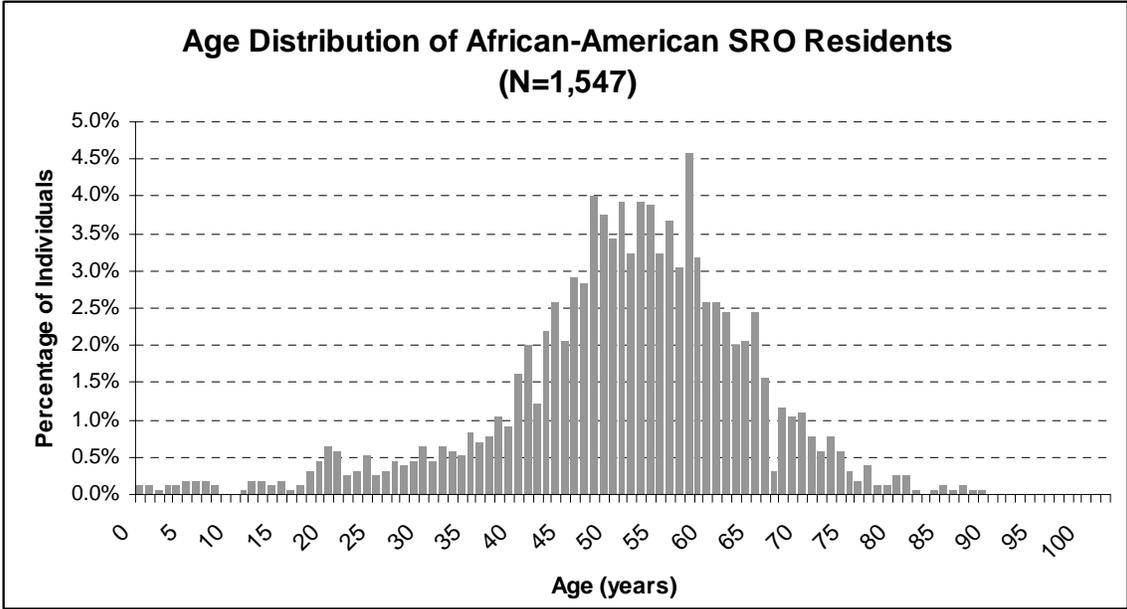
SSIP: Supplemental Security Income Pending

¹¹⁷ http://www.tacinc.org/HH/Program_Policy/Section8SROMod.htm

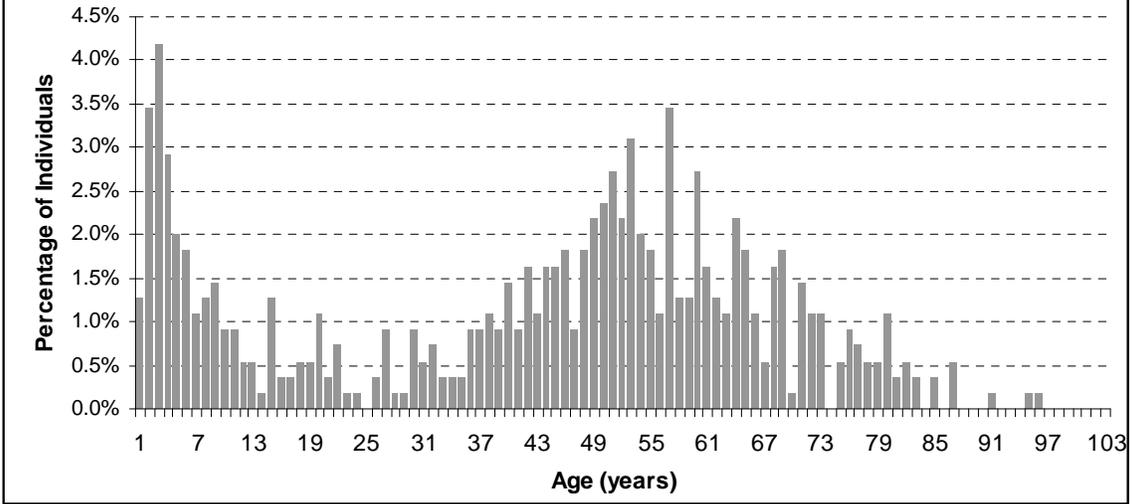
Appendix B: Additional Data

Master Profile

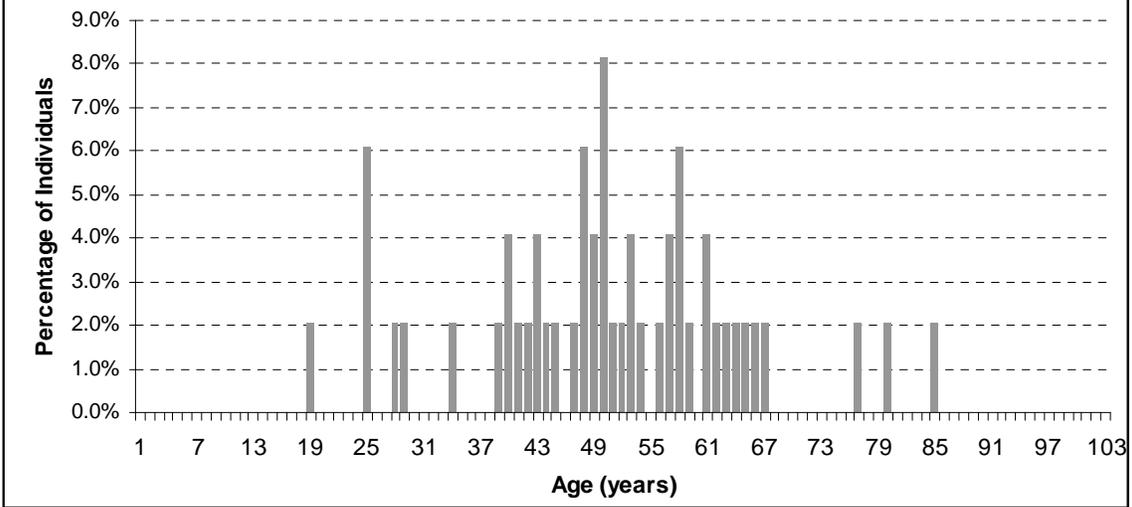
Name of Program	(A) Number of SRO Residents Who Participate in <u>Only</u> This Program	(B) <u>Total</u> Number of SRO Residents Who Participate in This Program	(A) / (B) Percentage of Program Participants Involved in This Program Only
Adult Protective Services (APS)	196	576	34.0%
County Adult Assistance Program (CAAP)	114	1495	7.6%
CalWORKs	0	159	0.0%
Cash Assistance Program for Immigrants (CAPI)	0	67	0.0%
Food Stamps	454	2426	18.7%
Foster Care	0	5	0.0%
In-Home Supportive Services (IHSS)	265	2374	11.2%
Medi-Cal	2219	4356	50.9%
Office on the Aging (OOA)	260	840	31.0%
Supplemental Security Income (SSI)	3147	5758	54.7%

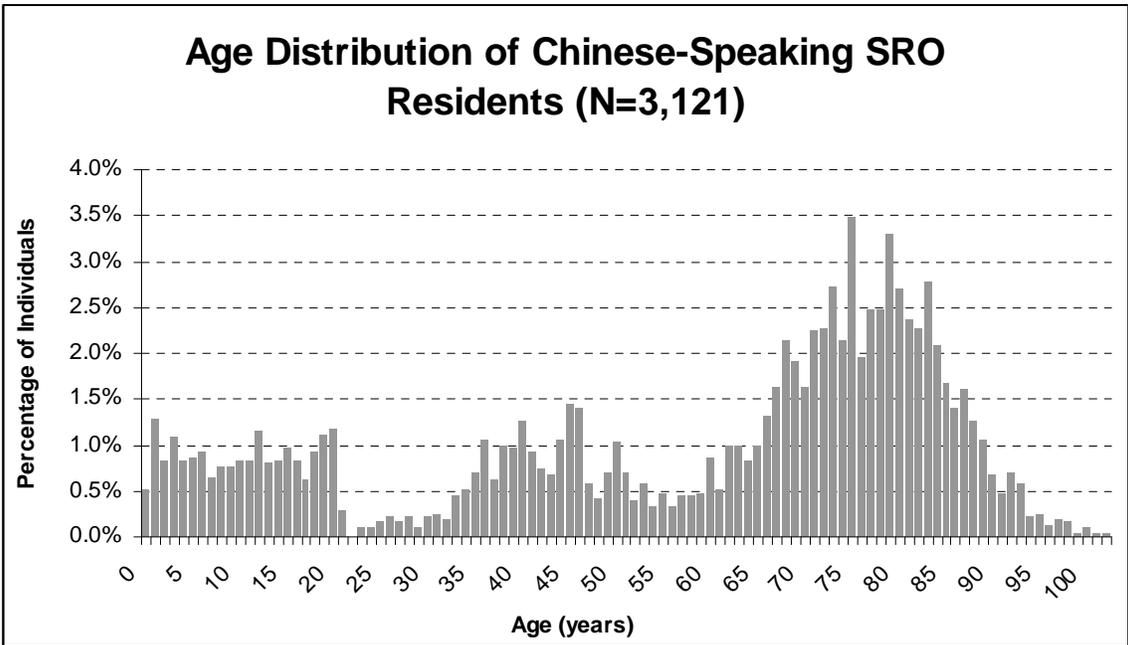
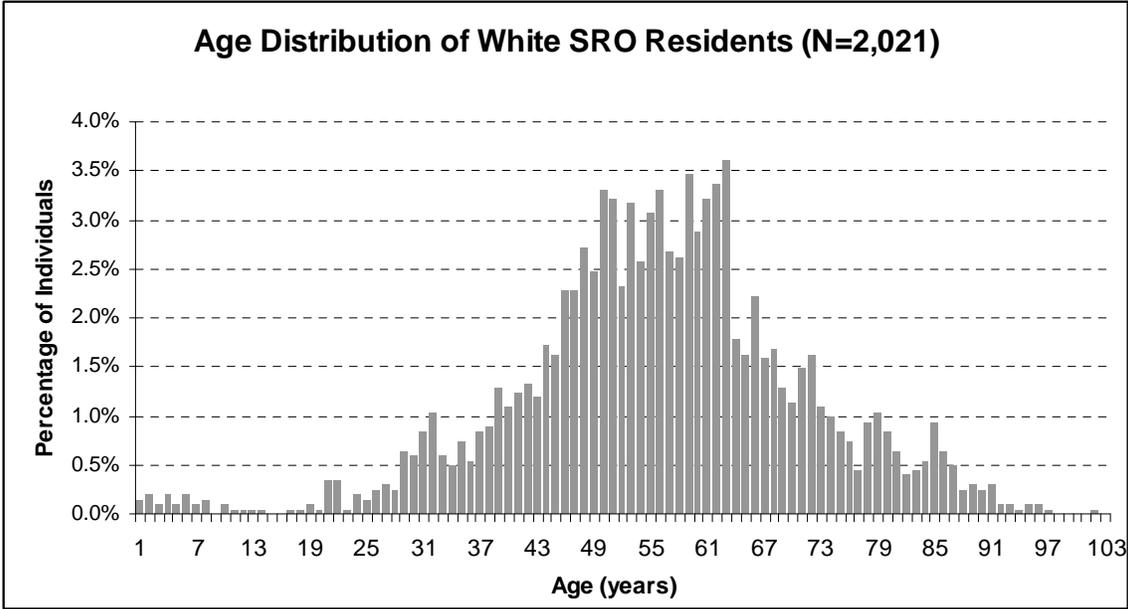


Age Distribution of Latino SRO Residents (N=550)

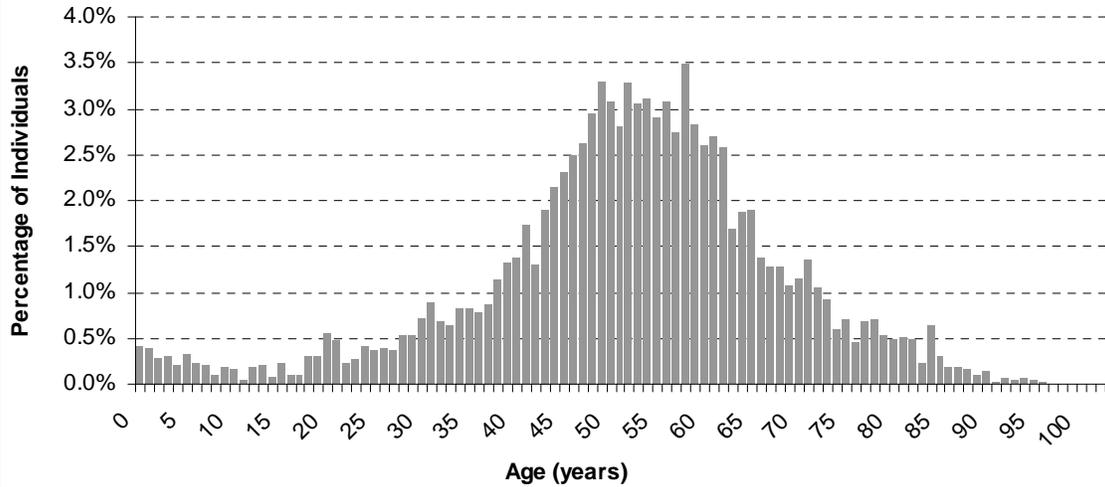


Age Distribution of Native American SRO Residents (N=49)

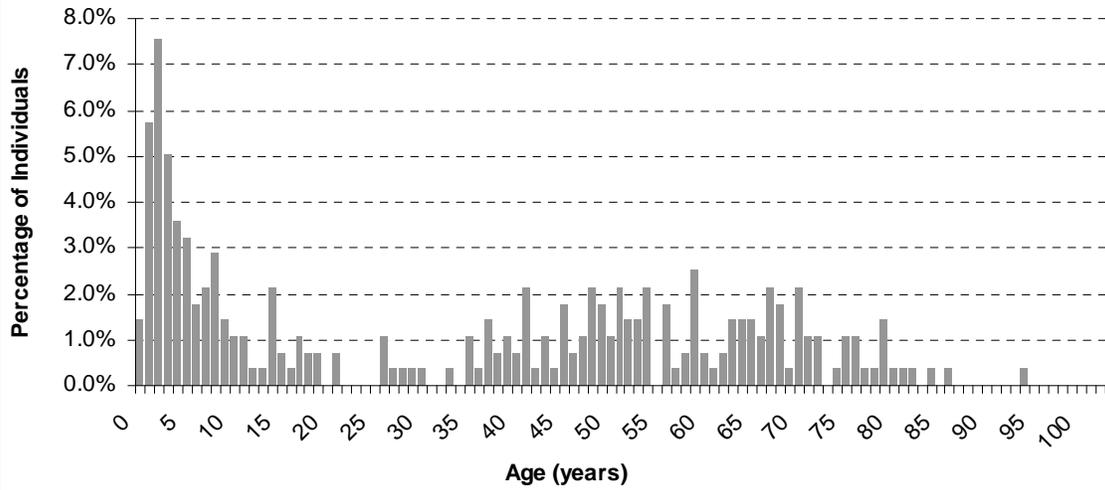




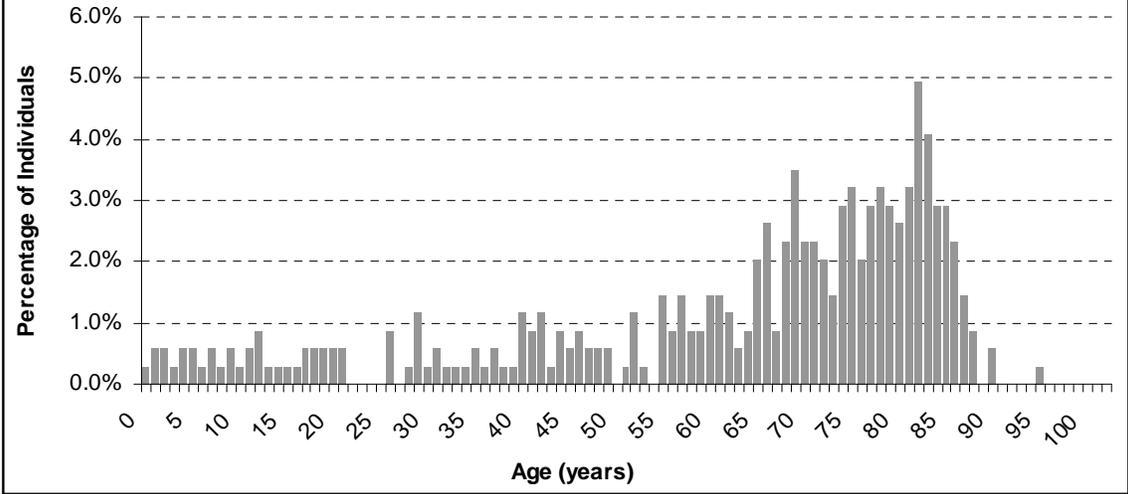
Age Distribution of English-Speaking SRO Residents (N=4,414)



Age Distribution of Spanish-Speaking SRO Residents (N=279)



Age Distribution of Other Non-English-Speaking SRO Residents (N=343)

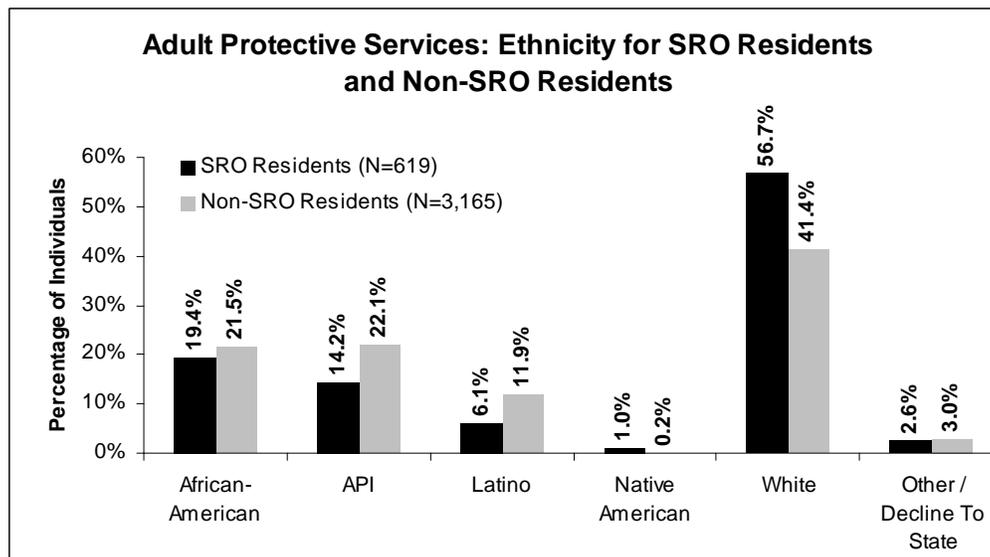
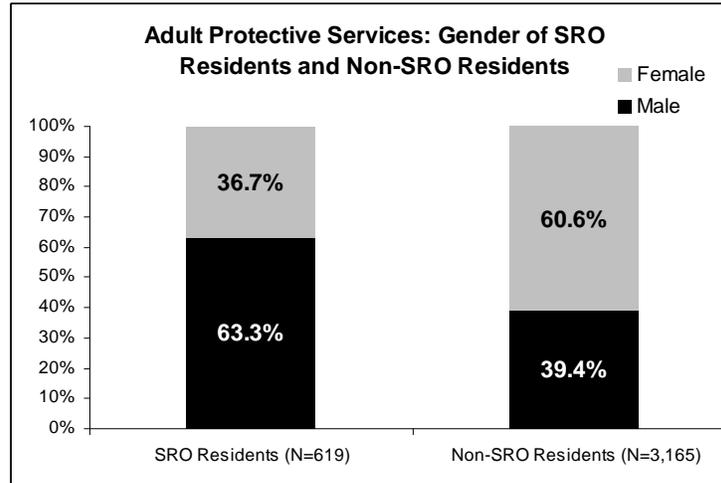


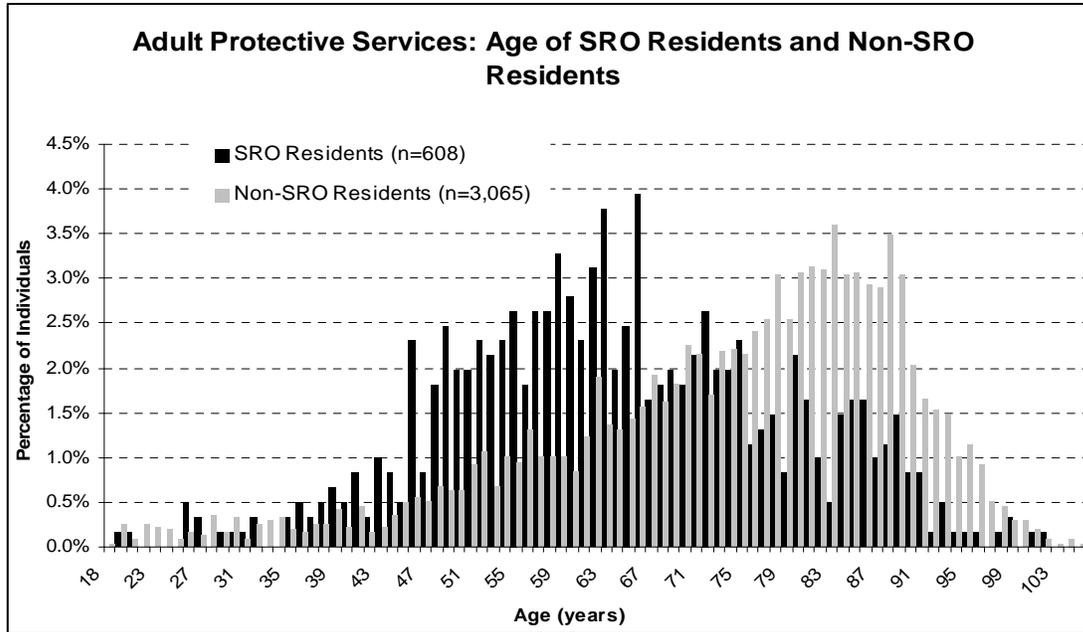
Adult Protective Services, 2008 Calendar Year

Key Findings for Adult Protective Services

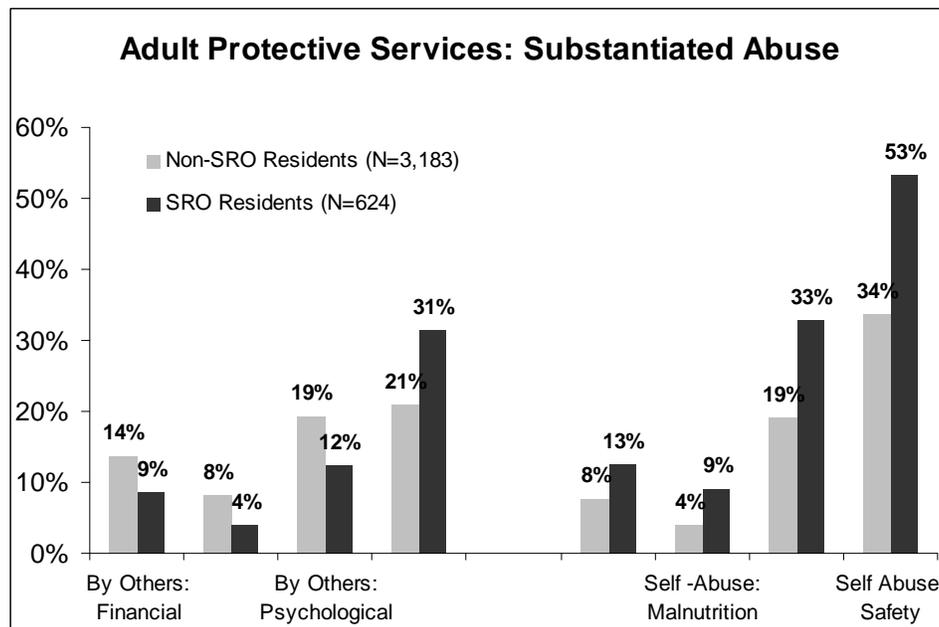
Relative to non-SRO residents, SRO residents display the following characteristics:

- higher percentage of males
- greater proportion of Whites; smaller proportion of African-Americans, Asian/Pacific Islanders, and Latinos
- tend to be younger
- smaller proportion reported for abuse by others (financial and neglect)
- larger proportion reported for self-abuse (health, malnutrition, medical, and physical)





Note: Age data was not available for all program participants.



CalWIN, January 2009

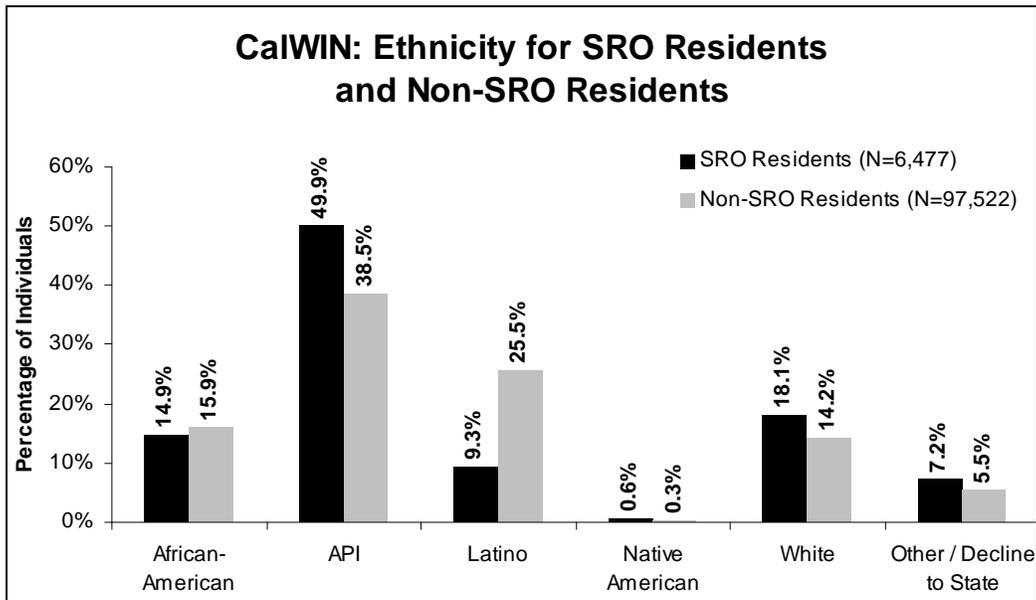
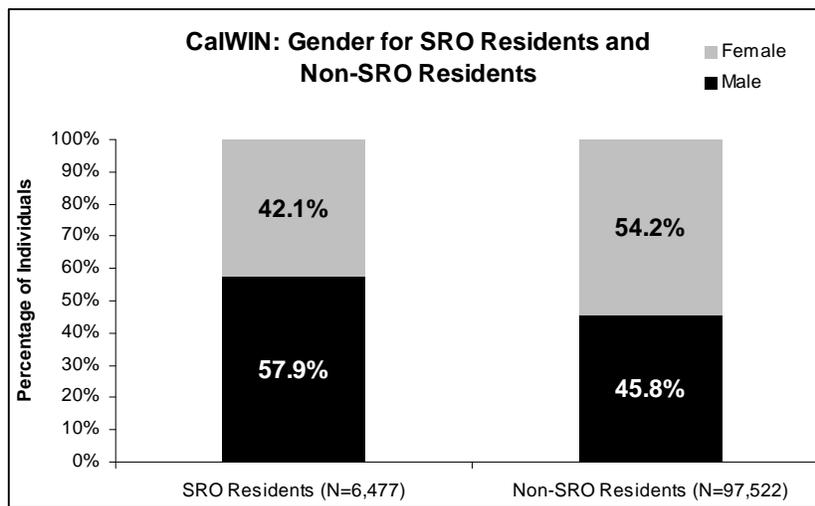
This report uses includes CalWIN data for the following programs:

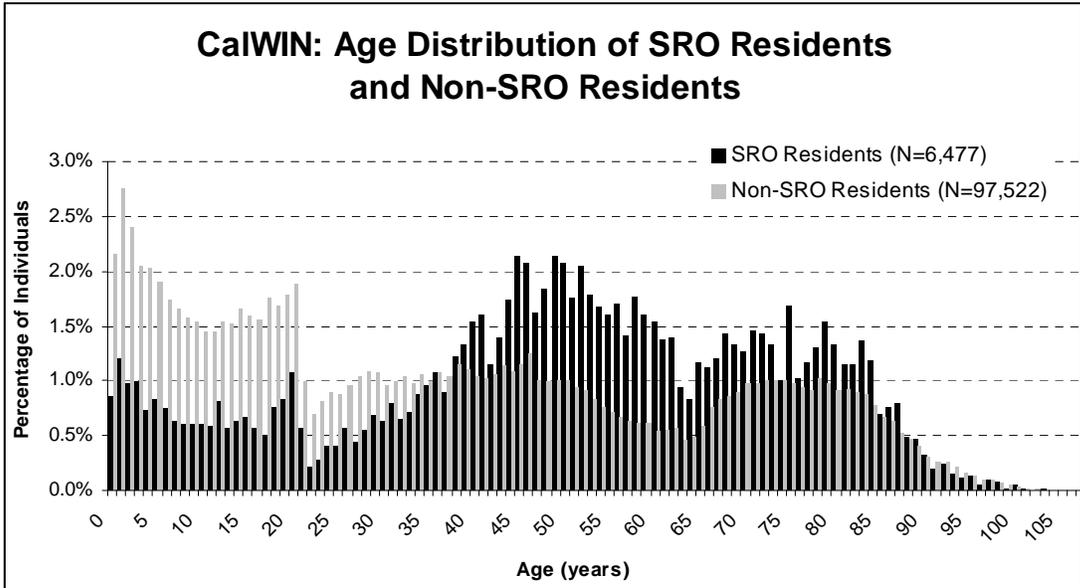
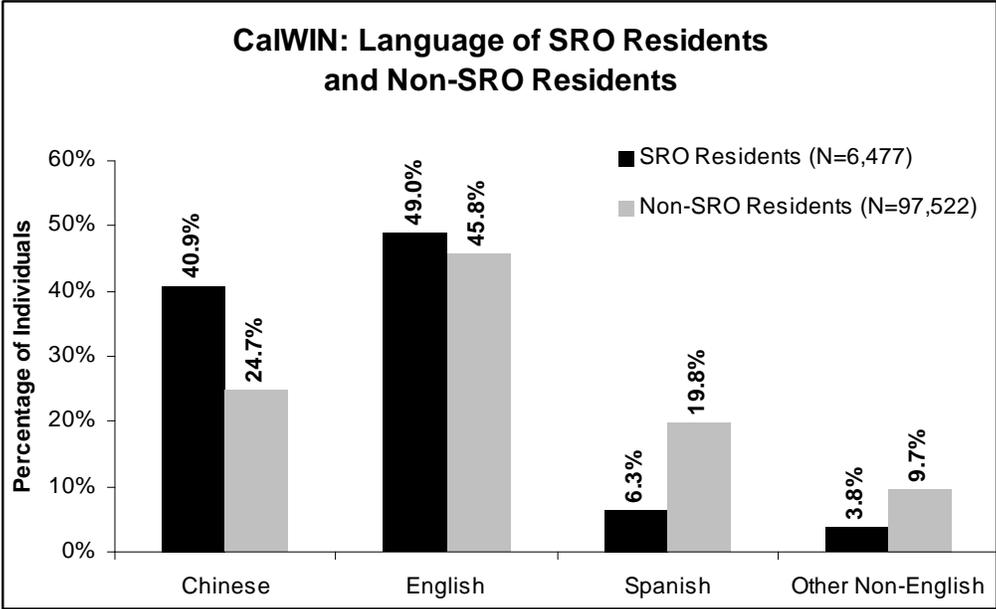
	Program Name	Program Description
1	Cash Assistance Program for Immigrants (CAPI)	Cash assistance program for immigrants who are disabled, blind, or age 65 or older. CAPI is a state-funded program that pays cash benefits to lawful non-citizens who do not qualify for SSI/SSP solely due to their immigration status.
2	California Work Opportunities and Responsibility to Kids (CalWORKS) / Temporary Assistance for Needy Families (TANF)	The CalWORKs program provides temporary financial assistance and employment focused services to families with minor children who have income and property below State maximum limits for their family size. Most able-bodied aided parents are also required to participate in the CalWORKs GAIN employment services program.
3	Foster Care	The Foster Care Program provides financial assistance for children who are in need of substitute parenting and have been placed in out-of-home care.
4	Food Stamps	The Food Stamp Program is a federally-mandated, state-supervised, and county-operated government program designed to eliminate hunger in the United States. Food Stamp benefits help low-income families and individuals improve their health by providing access to a nutritious diet. Income limits and financial resource levels establish eligibility for food stamp benefits. Most people enrolled in CalWORKs or San Francisco's County Adult Assistance Programs (CAAP) are eligible.
5	County Adult Assistance Programs (CAAP)	CAAP serves very low-income San Francisco adult residents without dependents through four programs: Personal Assisted Employment Services (PAES), Supplemental Security Income Pending (SSIP), Cash Assistance Linked to Medi-Cal (CALM) and General Assistance (GA). These four programs, which are unique to San Francisco, were created to provide more opportunities to engage those individuals formerly served only by General Assistance (GA), the most basic financial safety net. CAAP determines eligibility and issues benefits to clients who are not eligible for other state or federal cash aid programs.
6	Kinship Guardianship Assistance Payment (Kin-GAP)	Kin-GAP enables children exiting the juvenile court dependency system to live with a relative legal guardian as a permanent plan. Kin-GAP provides a subsidy payment that matches the basic foster care rate, based upon age, and pays the clothing and special needs allowance if applicable.
7	Medi-Cal	Medi-Cal provides health and long-term care coverage to low-income children, their parents, elderly, and disabled Californians. It is the largest source of federal funds to California.
8	Refugee Cash Assistance	Refugee Cash Assistance is a cash assistance and employment services program designed for adults without children who have official status as a refugee, and who have been in the United States for less than eight months. Aid is limited to eight months.

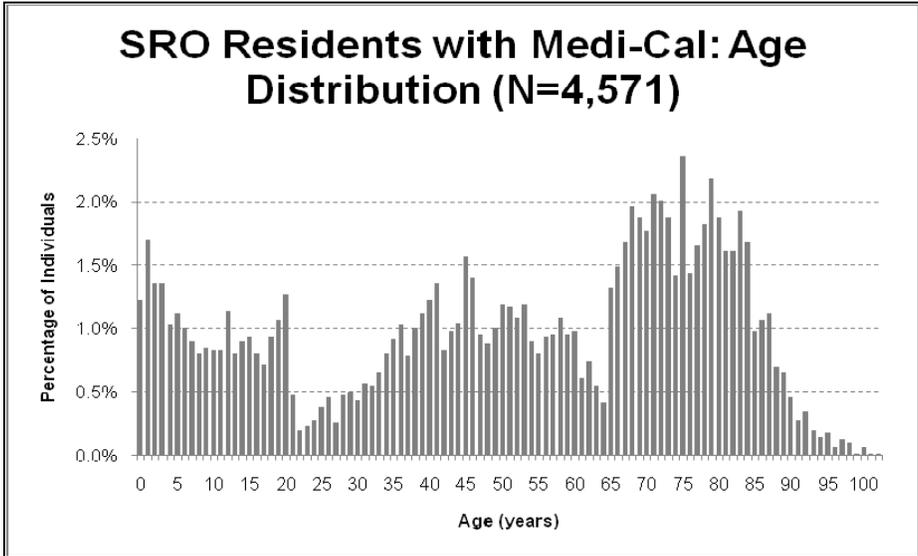
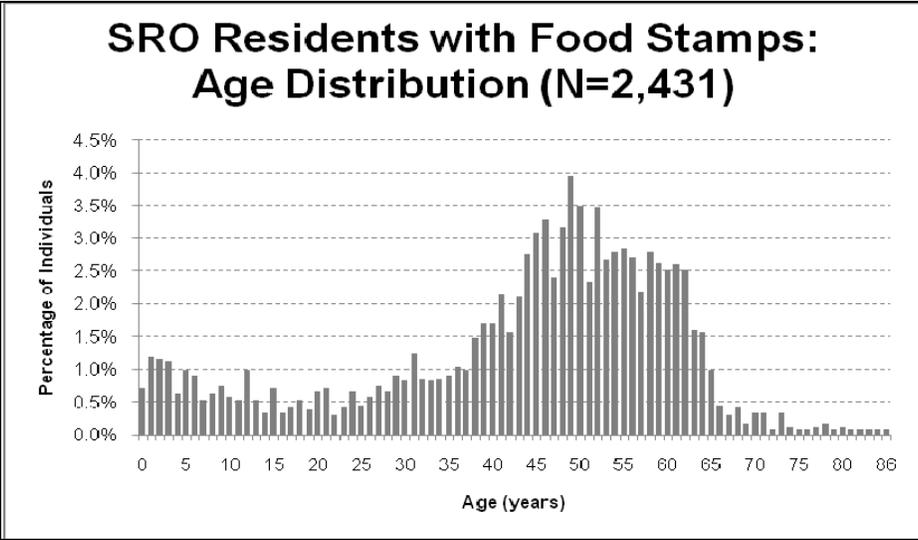
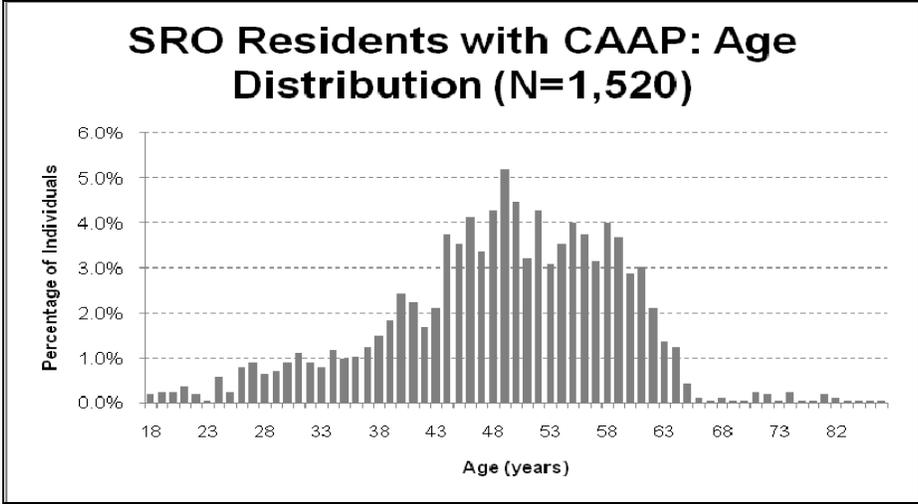
Key Findings for Individuals in CalWIN Database

Relative to non-SRO residents, SRO residents display the following characteristics:

- higher percentage of males
- larger proportion of Asian/Pacific Islanders and Whites, smaller proportion of Latinos
- much greater proportion of Chinese speakers, much smaller proportion of Spanish and other non-English speakers
- older







Child Welfare Services, 2004-08 (inclusive)

Key Findings for Child Welfare Services

Children in the Child Welfare Services Case Management System listed as living at an SRO address display the following characteristics:

- higher rate of substantiated child abuse allegations, relative to non-SRO residents
- higher percentage of allegations for neglect, substantial risk, caretaker absence/incarceration, and emotional abuse, relative to non-SRO residents
- large number of referrals for newborns (i.e., under one year old)
- increase in allegations, but not in substantiations, for school-age children
- decreasing number of children referred between 2006 and 2008

Gender	SRO Residents, All Referrals (N = 655)	Non-SRO Residents, All Referrals (N = 28,014)	All Referrals (N = 28,669)
Female	52.37%	50.24%	50.29%
Male	46.41%	49.09%	49.03%
Not Reported	1.22%	0.67%	0.68%
Total	100.00%	100.00%	100.00%

Year	Total Referrals (substantiated and unsubstantiated)	SRO Residents	Non-SRO Residents	Percentage of Referrals that are SRO Residents
2004	6,240	145	6,095	2.32%
2005	5,963	148	5,815	2.48%
2006	6,008	143	5,865	2.38%
2007	5,243	119	5,124	2.27%
2008	5,215	100	5,115	1.92%
Total	28,669	655	28,014	2.28%

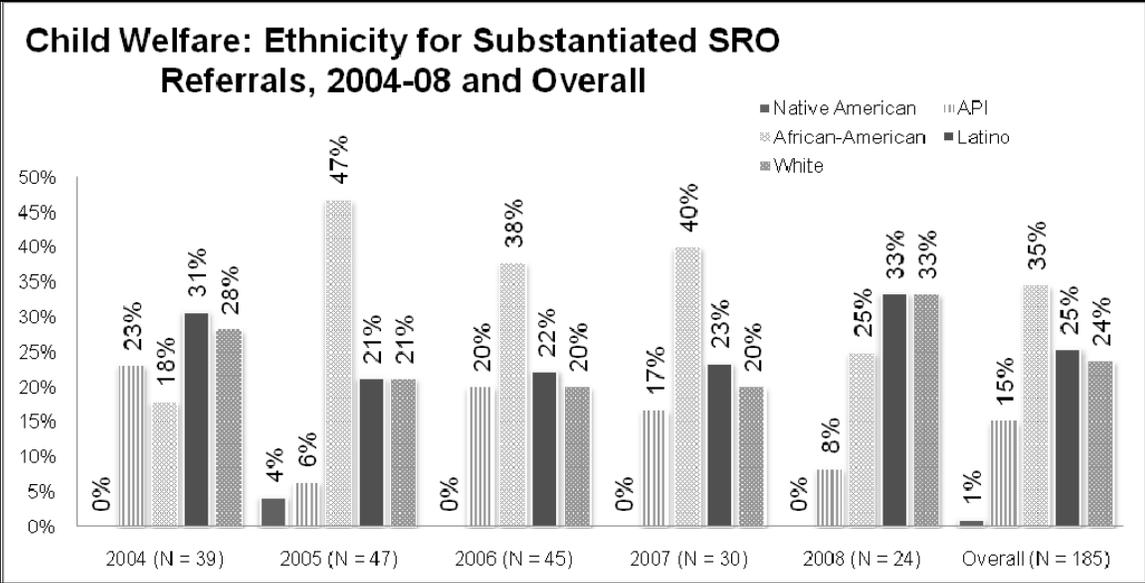
Year	Substantiated Referrals	SRO Residents	Non-SRO Residents	Percentage of Substantiated Referrals that are SRO Residents
2004	1,176	1,215	39	3.21%
2005	1,110	1,157	47	4.06%
2006	1,059	1,104	45	4.08%
2007	1,013	1,043	30	2.88%
2008	1,033	1,057	24	2.27%

Year	Substantiated Referrals	SRO Residents	Non-SRO Residents	Percentage of Substantiated Referrals that are SRO Residents
Total	5,391	5,576	185	3.32%

A “removal” refers to when children are removed from their homes and placed with an alternative caretaker for some period of time.

Year	Total Removals	SRO Residents	Non-SRO Residents	Percentage of Removals that are SRO Residents
2004	1,507	39	1,546	2.52%
2005	1,309	66	1,375	4.80%
2006	1,358	65	1,423	4.57%
2007	1,227	39	1,266	3.08%
2008	1,145	37	1,182	3.13%
Total	6,546	246	6,792	3.62%

Most Serious Abuse, 2004-08 (substantiated referrals)	SRO Residents (N = 185)	Non-SRO Residents (N = 5,391)	Total (N = 5,576)
At Risk, Sibling Abuse	1.62%	7.55%	7.35%
Caretaker Absence / Incarceration	23.78%	15.77%	16.03%
Emotional Abuse	8.11%	5.40%	5.49%
Exploitation	0.00%	0.15%	0.14%
General/Severe Neglect	36.76%	31.14%	31.33%
Physical Abuse	11.35%	15.97%	15.82%
Severe Neglect	0.54%	0.98%	0.97%
Substantial Risk	17.30%	17.60%	17.59%
Total	100.00%	100.00%	100.00%



Department of Public Health, Calendar Year 2008

DPH matched SRO addresses against its records for medical, mental health, and substance abuse treatment services during calendar year 2008. Aggregated information was provided at the neighborhood level.

Key Findings for Department of Public Health (DPH) Services, CY2008

With respect to public health service usage during calendar year 2008, SRO residents display the following characteristics:

Primary Care

- Among SRO residents 18 and older, those in the Tenderloin made the most visits; among residents under 18, those in Chinatown made the most visits

Other Medical Services

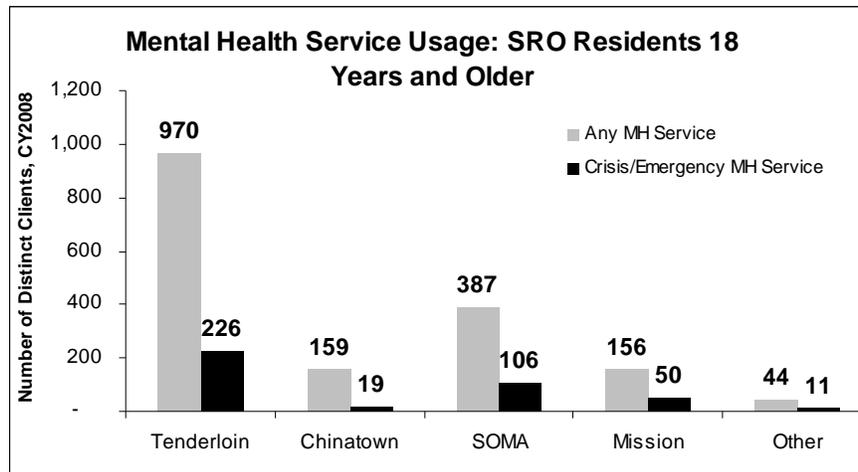
- Tenderloin SRO residents used the majority of other medical services
- Among SRO residents 18 and older, those in South of Market made the next largest number of visits; among residents under 18, those in Chinatown made the next largest number of visits

Mental Health Services

- Among SRO residents 18 and older, the greatest number of distinct mental health clients lived in the Tenderloin, followed by those in South of Market
- Among residents under 18, the greatest number of distinct mental health clients lived in Chinatown, followed by those in the Tenderloin

Substance Abuse Treatment Programs

- Tenderloin's SRO residents made up more than half the number of distinct substance abuse service clients, and South of Market's SRO residents made up one fourth

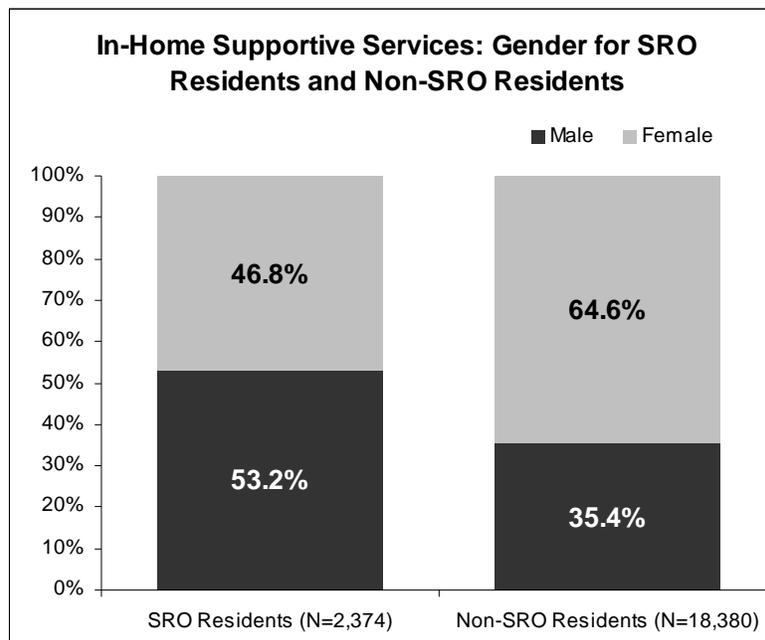


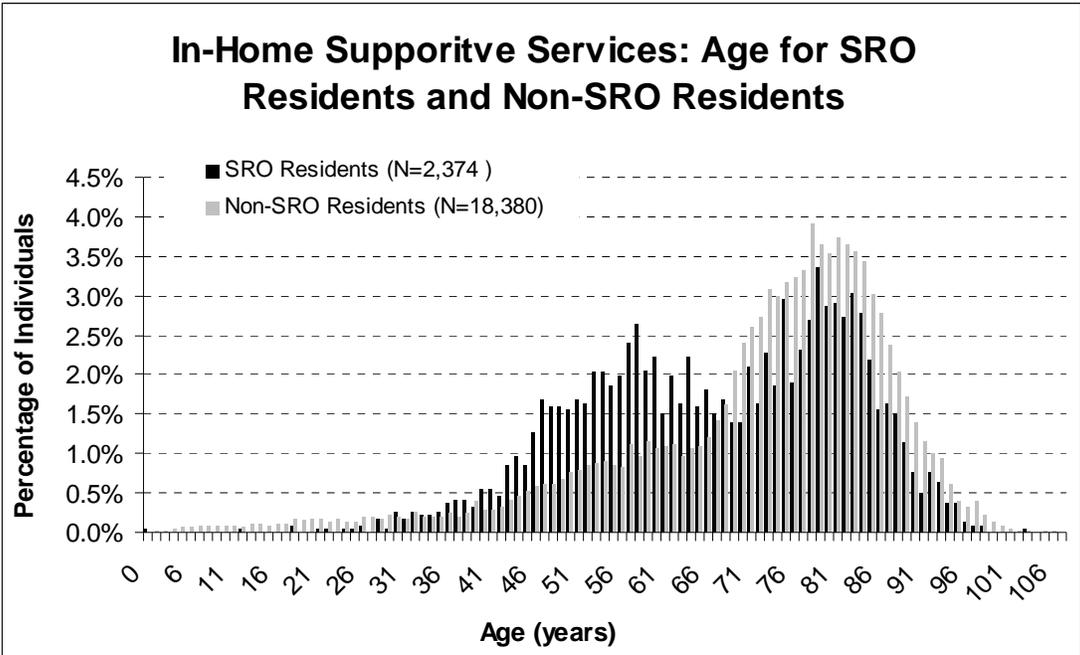
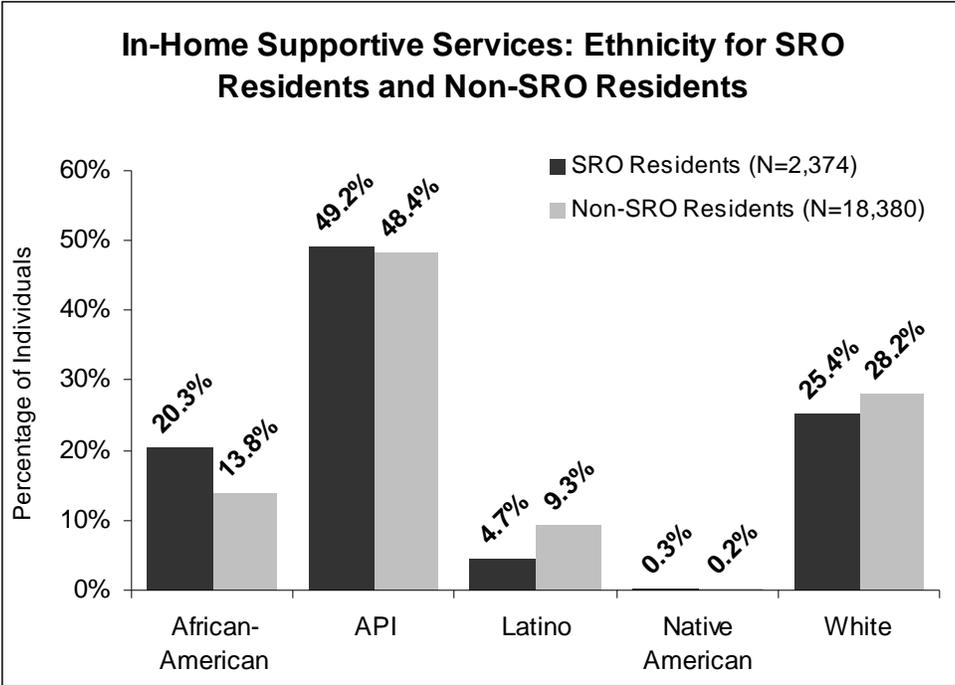
In-Home Supportive Services, December 2008

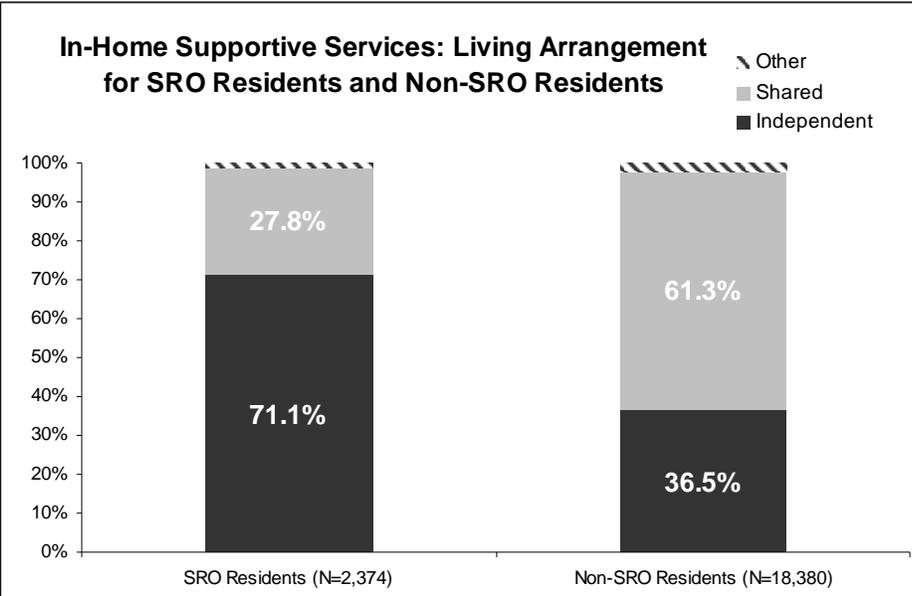
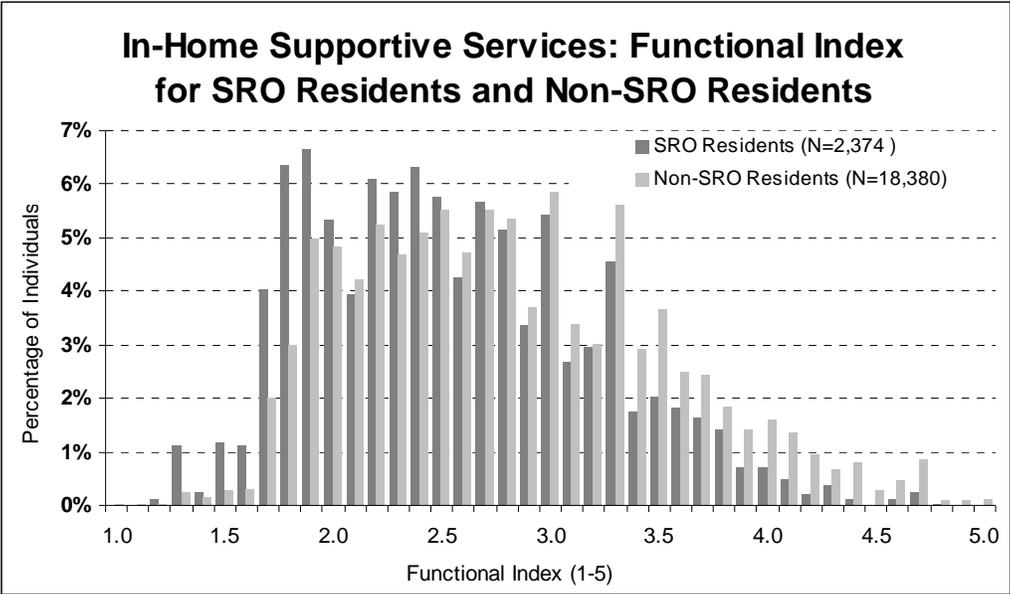
Key Findings for In-Home Supportive Services (IHSS) Recipients

Relative to non-SRO residents, SRO residents display the following characteristics:

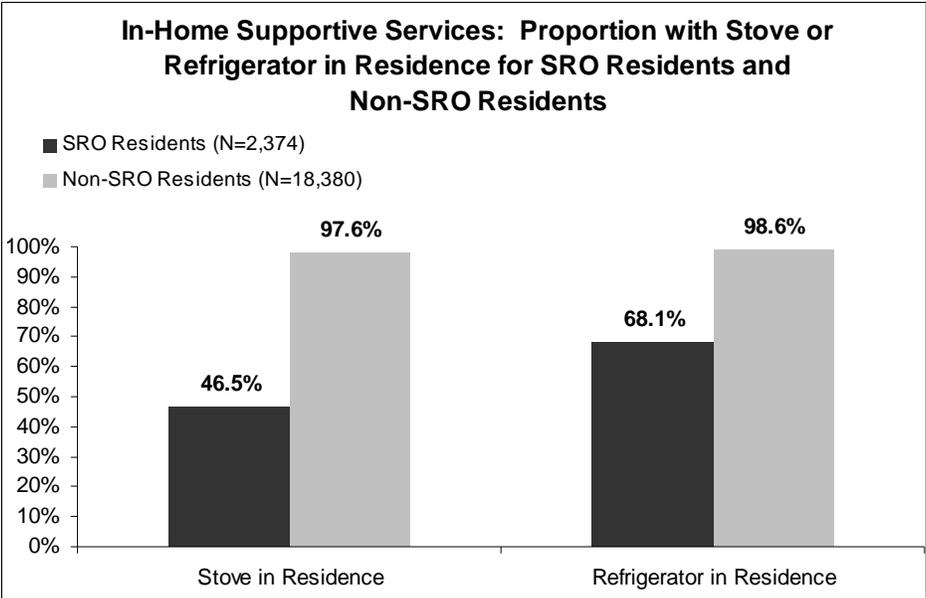
- higher proportion of males
- larger proportion of African-Americans, smaller proportion of Latinos and Whites
- younger
- less functionally limited
- greater proportion live independently
- fewer number of rooms in residence
- smaller proportion have stove or refrigerator in residence







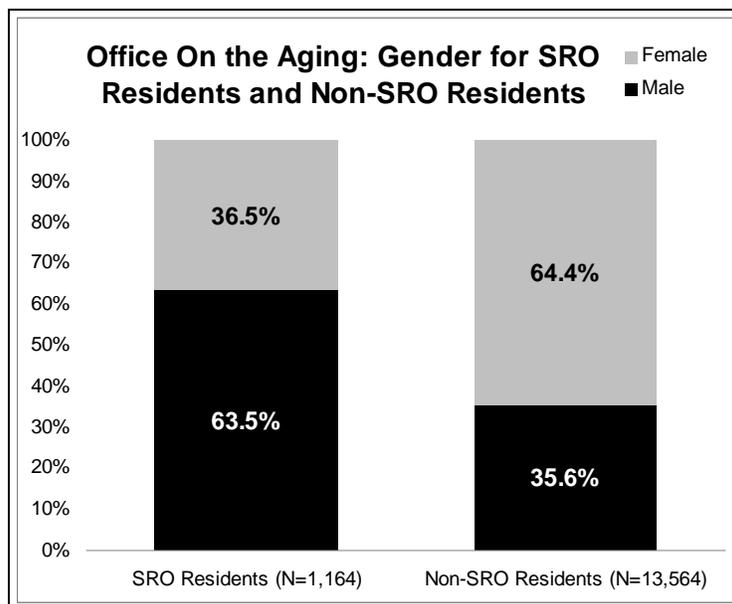
	SRO Residents (N=2,374)	Non-SRO Residents (N=18,380)
IHSS Average Number of Rooms in Residence (includes bathrooms)	1.6	4.4

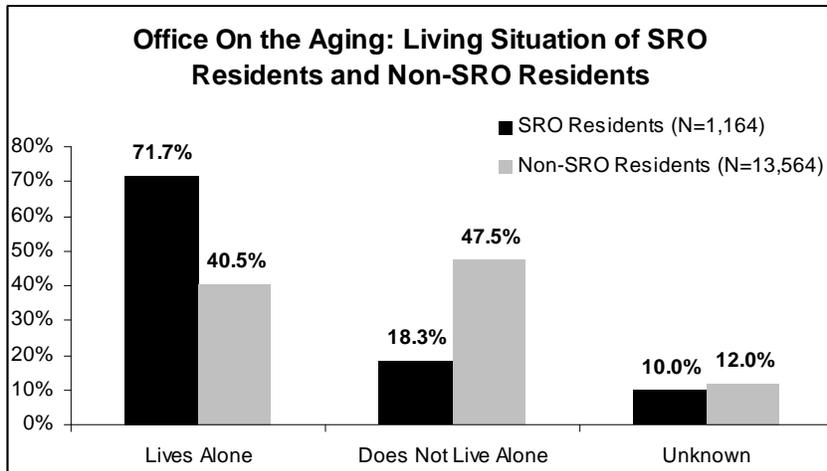
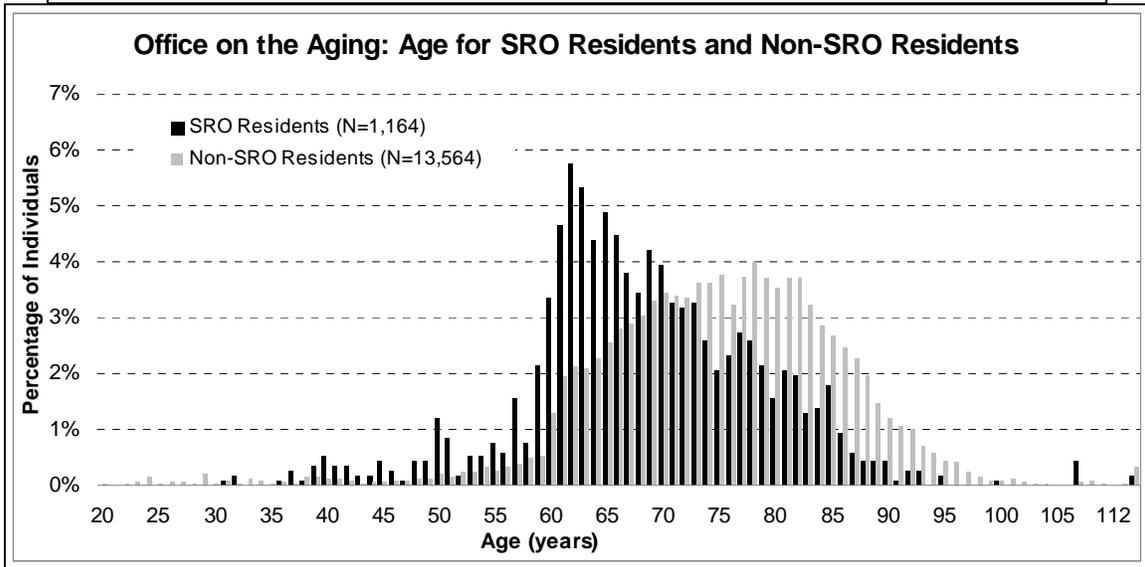
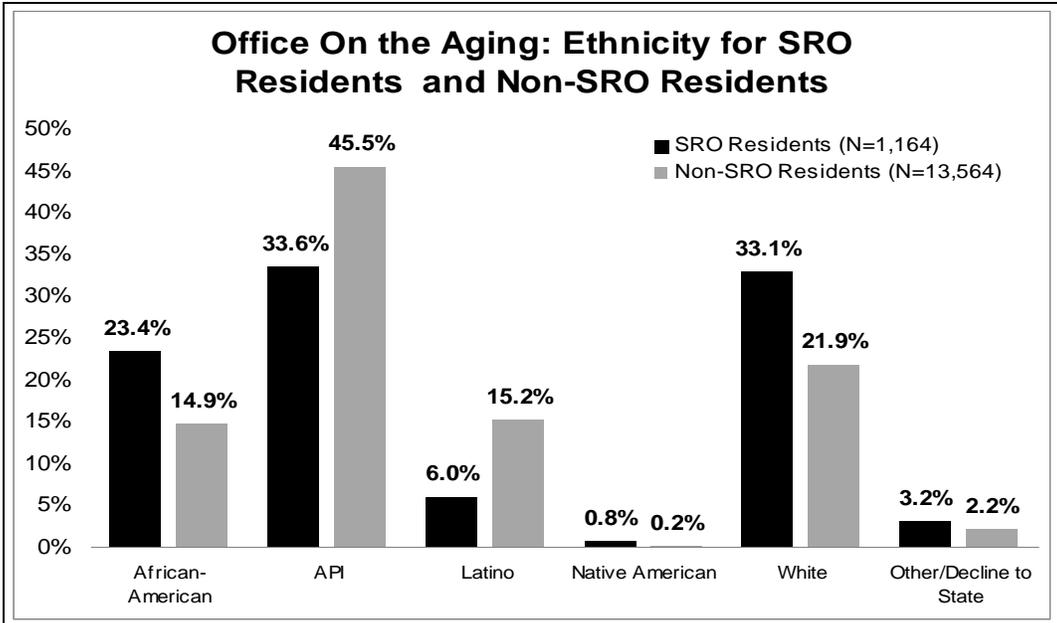


Key Findings for Office on the Aging (OOA) Participants

Relative to non-SRO residents, SRO residents display the following characteristics:

- higher proportion of males
- larger percentage of African-Americans and Whites, smaller percentage of Asian/Pacific Islanders and Latinos
- greater proportion of English speakers, smaller proportion of individuals who speak Chinese, Spanish, and other non-English languages
- younger
- larger proportion identified as disabled, smaller proportion retired
- greater proportion single or divorced, smaller proportion married or widowed
- greater proportion are veterans
- tend to live alone



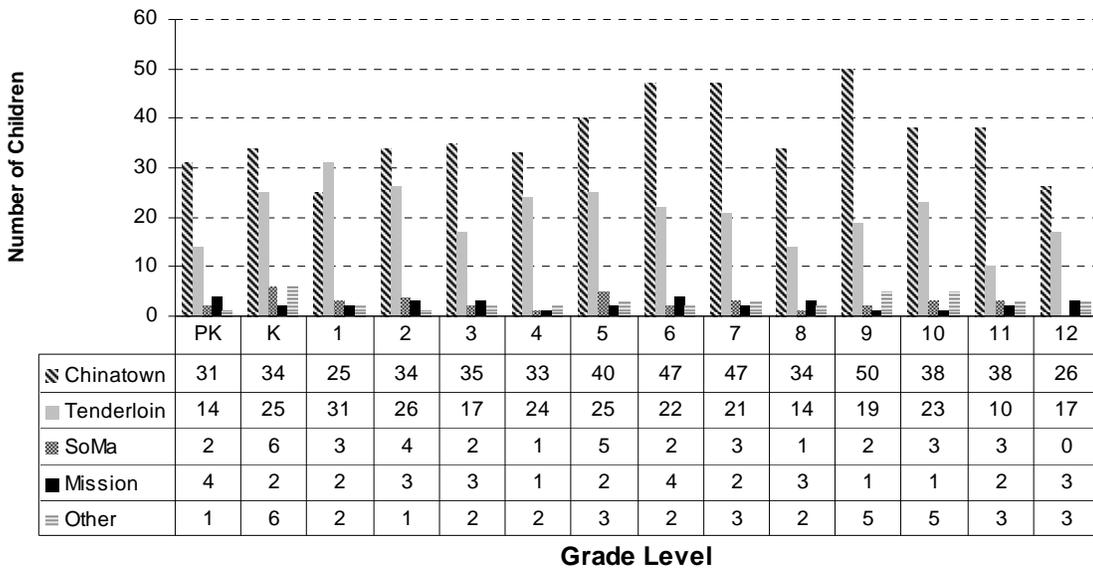


Key Findings for San Francisco Unified School District (SFUSD)

SFUSD children listed as living at an SRO address display the following characteristics:

- over half live in Chinatown; over one-fourth are in the Tenderloin
- more or less even distribution across grade levels
- 59% are Chinese and 17% are Latino
- 60% are English Language Learners, with the highest proportions in Chinatown and the Mission and the lowest in South of Market
- 10% have Special Education status, with the highest proportion in South of Market and the lowest in Chinatown
- just over three-fourths receive free/reduced lunch, the highest proportion being in Chinatown

SFUSD Children in SROs by Grade Level for Each Neighborhood (N=910)



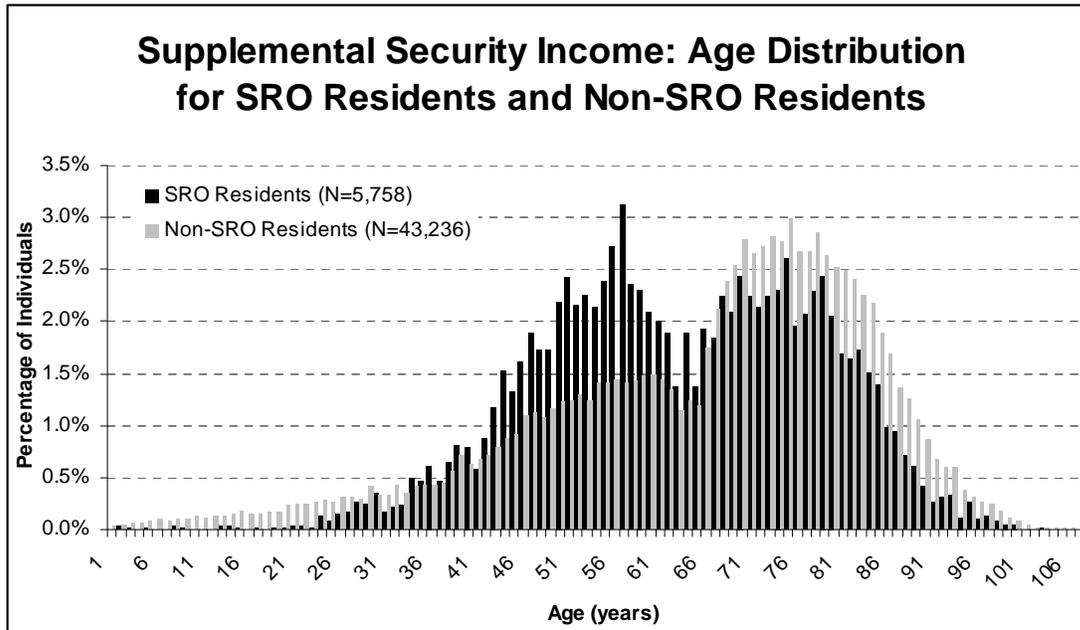
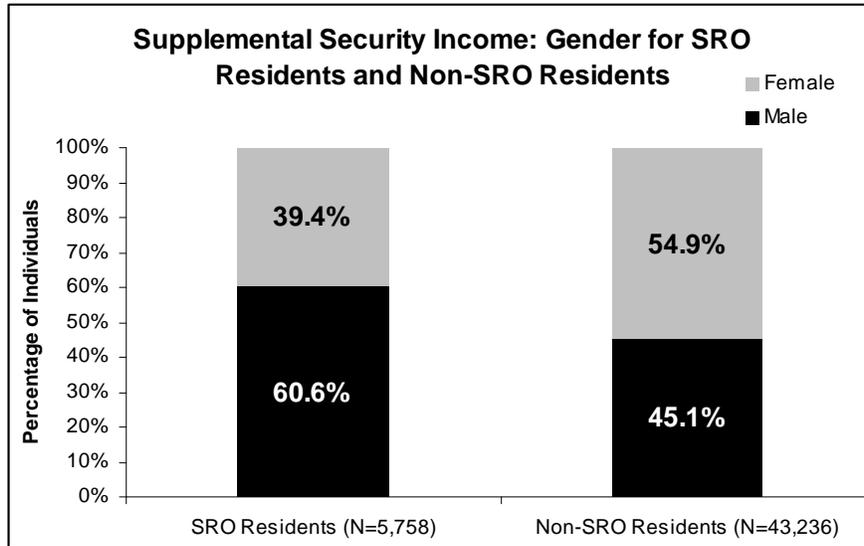
Ethnicity of SFUSD Children in SROs, by Neighborhood						
	Chinatown	Tenderloin	SOMA	Mission	Other	Total
African American	0	14	8	0	4	26
American Indian	0	1	1	0	0	2
Chinese	474	62	2	0	0	538
Filipino	9	30	0	4	3	46
Japanese	0	3	0	0	0	3
Latino	12	90	11	25	15	153
Samoan	0	0	1	0	1	2
Southeast Asian	1	15	1	0	0	17
Other Non-White	4	44	8	3	10	69
Other White	0	17	5	0	7	29
Decline to State	12	12	0	1	0	25

Supplemental Security Income, January 2008

Key Findings for Supplemental Security Income (SSI) Recipients

Relative to non-SRO residents, SRO residents display the following characteristics:

- higher proportion of males
- younger



Appendix C: Additional SRO Neighborhood Information and Maps

Neighborhood Demographics

Demographics	Tenderloin	Chinatown	South of Market	Mission	Citywide
Total neighborhood population	60,580	41,566	23,260	55,274	725,179
Median per-capita income	\$32,516	\$38,433	\$36,244	\$23,842	\$34,946
Proportion of non-English speaking population	19%	33%	12%	19%	13%
Proportion of foreign-born population	41%	53%	35%	45%	37%
High school graduation rate	81%	74%	86%	78%	86%
Proportion of persons 18 years old and under	9%	10%	6%	17%	14%
Proportion of married persons among persons aged 15 and older	26%	37%	22%	25%	34%

Source: Healthy Development Measurement Tool¹¹⁸

Note: Figures for Tenderloin and Chinatown are based on unweighted means of figures for the Planning Department neighborhoods to which they refer (see Table 4).

Neighborhood Quality of Life Indicators

Quality of life indicator	Tenderloin	Chinatown	South of Market	Mission	Citywide
Number of property crimes per 1,000 population	254	508	739	174	177
Proportion of population within 1/2 mile from retail food market ¹¹⁹	90%	79%	76%	83%	65%
Number of active neighborhood watch groups	2	3	11	10	178

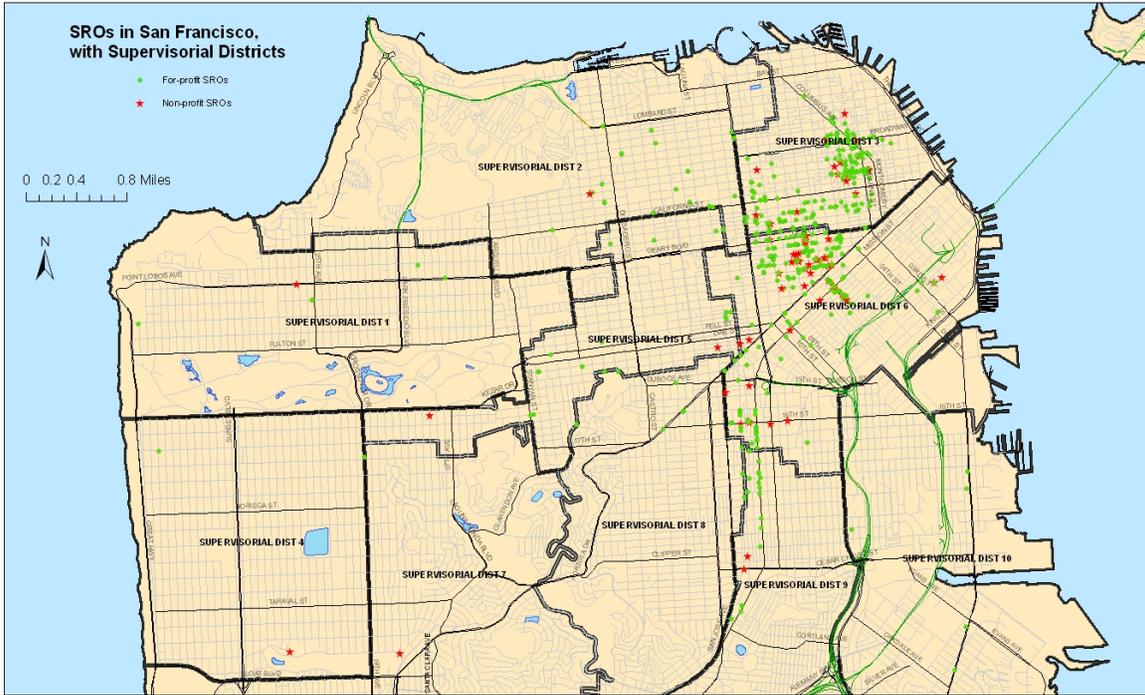
Source: Healthy Development Measurement Tool

Note: Figures for Tenderloin and Chinatown are based on unweighted means of figures for the Planning Department neighborhoods to which they refer (see Table 4).

¹¹⁸ The majority of HDMT indicators that use U.S. Census data rely on data from the 2000 Census, obtained from the GeoLytics® CensusCD® Neighborhood Change Database (NCDB) 1970-2000. In Spring 2008, some HDMT indicators using Census-based population and household denominator data were updated with new 2007 data released by Applied Geographic Solutions (AGS) in an attempt to reflect the changing population demographics of San Francisco. Unfortunately, AGS does not provide updated estimates for all Census variables used in the HDMT. As a result, HDMT indicators are based on a combination of both 2000 and 2007 data.

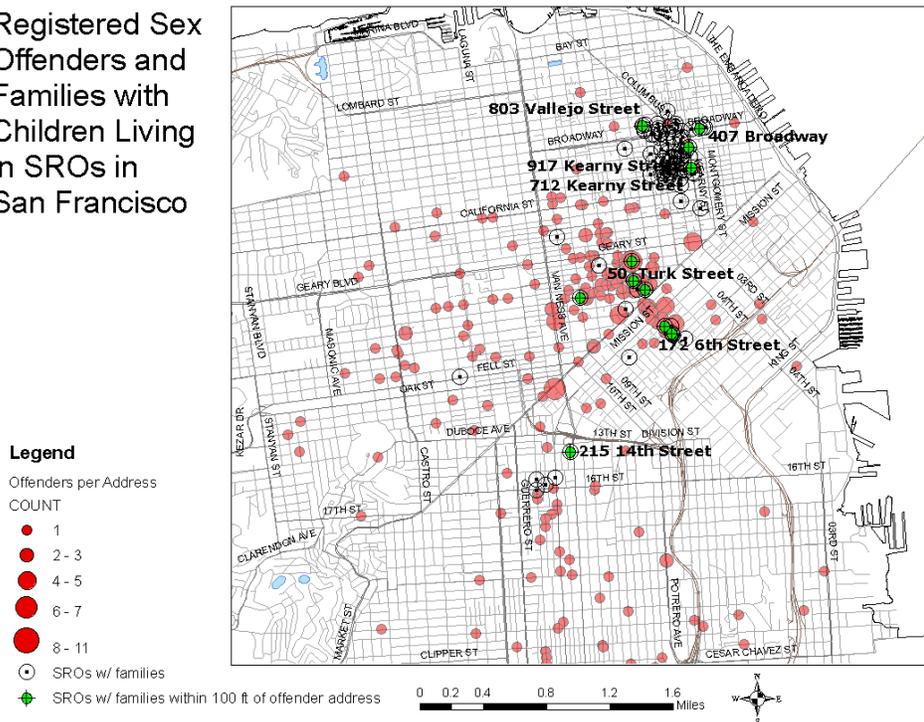
¹¹⁹ supermarket, grocery store, and produce store; 10,000+ sq ft

SROs and Supervisorial Districts



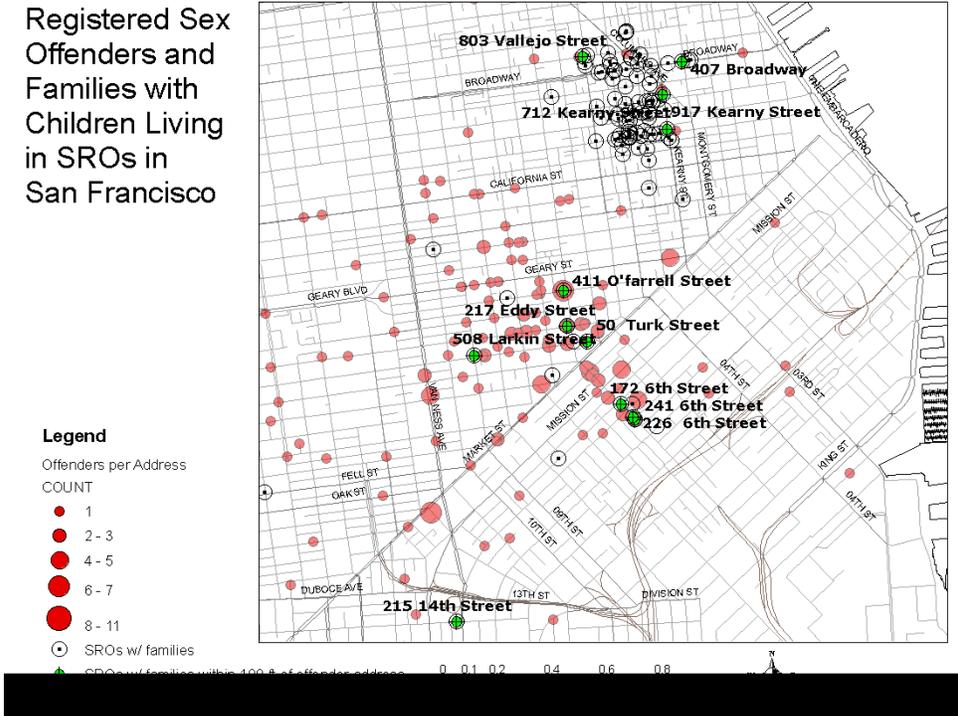
Registered Sex Offenders and Families with Children Living in SROs in San Francisco

Registered Sex Offenders and Families with Children Living in SROs in San Francisco



Source: San Francisco DPH

Registered Sex Offenders and Families with Children Living in SROs in San Francisco



Source: San Francisco DPH

Appendix D: HSA Single Adult Supportive Housing (SASH) and DPH Direct Access to Housing (DAH) Sites

HSA Single Adult Supportive Housing Sites

CNC = Care Not Cash, SO = Services Only, MS = Master Leased, O = Owned

Agency	Building	Units	Program	Owned / Leased	Street Address	Zip Code
CATS	Coronado	63	nCNC	ML	373 Ellis St	94102
Conard House	McAllister	80	CNC	ML	270 McAllister St	94102
Episcopal Community Services (ECS)	Elm	81	CNC	ML	364 Eddy St	94102
	Mentone	71	CNC	ML	387 Ellis St	94102
	Hillsdale	84	CNC	ML	51 6th St	94103
	Alder	117	CNC	ML	175 6th St	94103
	Coast	124	CNC	ML	516 O'Farrell St	94103
	Canon Kip	104	SO	O	705 Natoma St	94103
	Rose	75	SO	O	125 6th St	94103
Mary Elizabeth Inn	Mary Elizabeth Inn	90	CNC/SO	L	1040 Bush St	94109
Tenderloin Housing Clinic (THC)	AllStar	87	CNC	ML	2791 16th St	94103
	CalDrake	50	CNC	ML	1541 California St	94109
	Graystone	74	CNC	ML	66 Geary St	94108
	Pierre	87	CNC	ML	540 Jones St	94102
	Royan	69	CNC	ML	405 Valencia St	94103
	Union	60	CNC	ML	811 Geary Blvd	94109
	Elk	88	CNC	ML	670 Eddy St	94109
	Boyd	82	CNC	ML	41 Jones St	94102
	Hartland	137	nCNC	ML	909 Geary St	94109
	Jefferson	110	nCNC	ML	440 Eddy St	94109
	Leroy Looper	43	nCNC	ML	875 Post St	94109
	Mission	248	nCNC	ML	520 S. Van Ness Ave	94110
	Raman	85	nCNC	ML	1011 Howard St	94103
	Seneca	204	nCNC	ML	34 6th St	94103
Vincent	103	nCNC	ML	459 Turk St	94102	
Tenderloin Health	Aranda	110	CNC	ML	64 Turk St	94102
St. Vincent de Paul	Arlington	150	CNC	O	480 Ellis St	94102
Tenderloin Neighborhood Development Corporation (TNDC)	Ritz	88	SO	O	216 Eddy St	94102
	Civic Center Residence	203	SO	O	44 McAllister St	94102
	Dalt	177	SO	O	34 Turk St	94102

Agency	Building	Units	Program	Owned / Leased	Street Address	Zip Code
	Franciscan Towers	104	SO	O	217 Eddy St	94102
	9 Scattered Sites	450	SO	O		
	Sierra Madre	47	SO	O	421 Leavenworth St	94102
	Cameo	31	SO	O	481-485 Eddy St	94102
	Yosemite	32	SO	O	480 Eddy St	94102
	Klimm	42	SO	O	460 Ellis St	94102
	Plaza Ramona	63	SO	O	250/260 McCallister St	94102
	398 Haight St.	12	SO	O	398 Haight St	94102
	1601 Howard St.	12	SO	O	1601 Howard St	94102
	220 Pierce St.	8	SO	O	220 Pierce St	94102
Civic Center Residence	203	SO	O	44 McCallister St	94102	
Community Housing Partnership (CHP)	Iroquois	74	SO	O	835 Ofarrell St	94109
	Senator	89	SO	O	519 Ellis St	94109
	San Cristina	59	SO	O	1000 Market St	94102
	Essex	84	LOSP	O	684 Ellis St	94109
	Hamlin	67	SO	O	385 Eddy St	94102
	Cambridge	59	SO	O	473 Ellis St	94102
	William Penn	91	SO	O	160 Eddy St	94102

DPH Direct Access to Housing Sites

Agency	Building	DAH Units	Street Address	Zip Code
Episcopal Community Services (ECS)	The Le Nain Hotel	86	730 Eddy St	94109
	The Pacific Bay Inn (PBI)	75	520 Jones St	94102
Baker Places	The Star Hotel	54	2176 Mission St	94110
	The Camelot Hotel	55	124 Turk St	94102
	The Empress Hotel	90	144 Eddy St	94102
DPH, Housing and Urban Health	The Windsor Hotel	90	238 Eddy St	94102
Tenderloin Neighborhood Housing Corporation (TNDC)	The Civic Center Residence	60	44 McAllister St	94102
	The West Hotel	40	141 Eddy St	94102
Lien Shutt	Parkview Terraces	10	871 Turk St	94102
Lutheran Social Services	Folsom Dore Apartments	20	75 Dore St	94103
Mercy Housing	Mission Creek Senior	51	225 Berry St	94158
Conard House	The Plaza Apartments	106	988 Howard St	94103
DPH Chronic Alcoholics Program	Arlington Hotel	20	480 Ellis St	94102
	Bayanihan House	152	88 6th St	94103
	Eddy St. Apartments	5	425 Eddy St	94109
	Hotel Isabel	10	1095 Mission St	94103
	Knox Hotel	10	241 6th St	94103
	William Penn Hotel	5	160 Eddy St	94102
	990 Polk	50	990 Polk	94109
	Mosaica	11	601 Alabama St	94110

Appendix E: San Francisco SRO Hotel Safety and Stabilization Task Force

According to the City and County of San Francisco Board of Supervisors¹²⁰, the SRO Task Force assists in the implementation of the following two goals:

- “1. San Francisco SRO Hotels are safe, accessible, stable, and ‘just’ places to live in.
 - Identify and provide training, consultation and direct services furthering this goal.
 - Develop and advocate legislation, regulations, policies and/or procedures furthering this goal.
 - Monitor compliance with relevant laws, regulations, policies and/or procedures.
2. Affordable, healthy, and appropriate housing options are available in San Francisco so that extremely low-income families do not have to raise their children in SRO Hotels.
 - Advocate strategies to move families out of SROs and into permanent housing.
 - Advocate goals for assuring San Francisco housing and supportive housing units are affordable to 0-25% medium income families will be advocated for.
 - Advocate strategies to prevent families from losing their housing.
 - Review San Francisco Planning Code, Administrative Code, and other pertinent City Ordinances and recommend amendments necessary to implement Goal 2.”

The SRO Task Force has fourteen members, eight of whom are appointed by the Board of Supervisors:

- one SRO tenant;
- two private SRO owners/operators;
- one non-profit SRO operator/owner; and
- one representative from each of the four SRO Collaboratives (Mission SRO Collaborative, Central City SRO Collaborative, Chinatown SRO Collaborative, and Families SRO Collaborative).

In addition to these eight members, five voting members are appointed by the heads of each of the following San Francisco departments/agencies:

- the Director of the Human Services Agency (one representative),
- the Director of the Department of Building Inspection (one representative),
- the City Attorney (one representative from the Code Enforcement Task Force), and
- the Director of the Department of Public Health (one representative from Housing and Urban Health and one representative from Environmental Health).

Also, the Director of the Department of Public Health appoints one non-voting (except in the case of a tie vote) Task Force Chair. Members of the SRO Task Force are appointed for a term of three years. In the event a vacancy occurs, the Board of Supervisors appoints a successor to complete the remainder of that term.

The SRO Task Force is set to sunset on December 31, 2009.

¹²⁰ http://www.sfgov.org/site/bdsupvrs_page.asp?id=49415

Appendix F: Services Connection Pilot Project and Program

According to the Department of Adult and Aging Services (DAAS), “research demonstrates that older adults who live in federally subsidized housing, including public housing, have much more complex service needs than their more affluent counterparts.”¹²¹ The same is likely true for low-income seniors living in SROs.

- Purpose: To link older adults and adults with disabilities living in public housing with services provided in the community.
- Collaboration between DAAS, the San Francisco Housing Authority (SFHA), Resource Centers for seniors and adults with disabilities, and community-based service providers

2006 Pilot Project, worked with 2 sites (350 Ellis and 666 Ellis), services offered:

- meals
- transportation
- IHSS
- mental health (early intervention)
- health education
- information and referrals (resource centers for seniors and adults with disabilities)
- social events
- on-site recreation activities
- social outings
- day trips to service providers

June-August 2007, brought the following services into buildings:

- Department of Public Health
- Adult Day Health Center
- Paratransit
- St. Mary’s Senior Lifeline
- IHSS
- Community Living Fund (CLF)
- Zen Hospice
- Glide Community Outreach
- Curry Center
- Project SAFE
- 211 Community Services Information Line
- San Francisco Police Department
- Independent Living Resource Center
- California Telephone Access Program
- Mental Health Association
- Food Stamps
- Medi-Cal
- On Lok
- Hospitality Center
- Self-Help for the Elderly
- Downtown Senior Center

In 2008, expanded into two new senior/disabled SFHA buildings (Rosa Parks, Clementina Towers).

¹²¹ Memorandum dated 7/25/08 from Shireen McSpadden, HSA Deputy Director, and David Curto, HSA Director of Contracts, to the Human Services Commission about implementation of Services Connection Program.

Appendix G: Key Informant Interview Protocol

ORGANIZATION

- How does your agency or organization work with SRO residents?

RESIDENTS

- How would you describe the population living in SRO's in San Francisco? What are the differences between neighborhoods (Tenderloin, Chinatown, South of Market, the Mission)?
- What is unique about SRO residents as opposed to other low-income/at-risk populations?
- What do you see as SRO residents' most common needs (in general, or for sub-populations)?
- What are the unique opportunities in working with SRO residents?
- What are the barriers to serving them?
- About how many SRO residents receive no services or only receive services when they are in crisis? Do you have any ideas about how to better reach them?

OWNERS/STAFF

- Have you attempted to work with SRO owners or staff?
- What have your interactions with SRO owners/staff been like?

CHANGE OVER TIME

- Have you noticed changes in this population over time?
- Have you noticed differences in SROs' physical conditions and/or social climates across time or across different properties?

FURTHER QUESTIONS

- What has been done (that did or did not work)?
- What has not been done and why?
- Has your agency collected any information or research about SRO residents?
- Who else should I talk to?

Appendix H: SRO Definitions

Units in new construction SRO housing and SRO hotels are almost universally complete studio (or larger) apartments¹²². Properties legally classified as “SRO hotels” name and call themselves “hotels,” and many are known by a unique name, such as “The Vincent” or “The Roxy”.

Federal definitions stress the suitability of SROs for able-bodied single adults. The federal Homeless Assistance Amendments Act of 1992 establishes that “‘single room occupancy housing’ means a unit that contains no sanitary facilities or food preparation facilities, or contains one but not both types of facilities,...that is suitable for occupancy by an eligible individual capable of independent living¹²³.”

The Department of Housing and Urban Development (HUD) defines an SRO unit as “a residential property that includes multiple single room dwelling units. Each unit is for occupancy by a single eligible individual. The unit need not, but may, contain food preparation or sanitary facilities, or both¹²⁴.”

In a publication about affordable housing for “low- and modest-income seniors,” HUD offers a more detailed definition: “An SRO is a residential building, often in a downtown area, that rents small private rooms to low-income individuals on a weekly or monthly basis. SROs usually have some common or shared spaces such as bathrooms, living rooms, and kitchens¹²⁵.”

A recent HUD newsletter article explains that SROs are “efficiency or studio units, ranging in size from 200 to 400 square feet, which provide affordable housing options to very-low- and low-income single adults. Residents may share common areas and, in some cases, kitchen and bathroom facilities. While SROs have traditionally been hotels located in central cities that catered to low-wage workers, today, they are often studio apartments that offer affordable housing options for students, recent graduates, and other low-income, single-person households¹²⁶.”

Some states and local authorities distinguish SROs from other living facilities. Numerous states and local jurisdictions recognize SROs or “compact living quarters” as a unique living situation¹²⁷. Illinois, New York and California legally define “Single Room Occupancy” as a distinct class of hotels. In general, SRO hotels are regarded as more residential than transient, although few studies have ever examined the precise mix. A 1992 study based on financial filings compared residential hotels, SRO hotels, and rooming houses in New York City. Hotels that the city classified and taxed as “residential” derived 40 per cent or more of their income from accommodating transients; hotels the city classified as

¹²² Brownrigg (2006)

¹²³ Stewart B. McKinney Homeless Assistance Amendments Act of 1992. This law modified and expanded Title IV shelter and housing provisions and the use of vouchers.

¹²⁴ Brownrigg (2006)

¹²⁵ Harahan et al. (2006)

¹²⁶ Regulatory Barriers Clearinghouse (2008)

¹²⁷ Brownrigg (2006)

SRO hotels collected less than 22 per cent of their incomes from transients, while boarding houses had practically no income from transients¹²⁸.

California. California jurisdictions generally recognize SRO (or “compact living”) hotels although these are classified differently in various counties and cities, as transient, as residential, or in a special category.

- **Fullerton.** In the City of Fullerton, an SRO residential hotel is “a building or structure containing six or more SRO units and developed in accordance with § 15.30.080 of this title. Notwithstanding the above, an SRO hotel does not include a building or structure in which persons are housed or detained under legal restraint, hospitalized or otherwise under medical, nursing or psychiatric care.” [SOURCE: City of Fullerton 2004 (Zoning Ordinance)]
- **Oakland.** A study of 22 “residential SRO hotels” in central Oakland concluded 75 per cent of the occupants' households had been living in their respective units for longer than one year and a third had been residing in the same hotel for longer than five years. In a prior 1985 survey of Oakland SRO hotels, 37 per cent of the residents reported they had been staying longer than one year (City of Oakland HCD/CEDA 2004).
- **San Diego.** The City of San Diego classifies an SRO facility as "a facility with more than five sleeping rooms that is kept, used, maintained, advertised, or held out to the public as a place where sleeping rooms are offered on a single room occupancy (SRO) basis and intended for use as a primary residence for residential guests for a period of more than thirty days." [SOURCE: City of San Diego 2003 (Municipal Code 1301:7-5-08 (A) §124.1.2).] San Diego also identifies Supportive Housing Options (“SHO”) permanent residences, which are a protected class of residential hotels which must be replaced in kind or with a contribution to the SRO construction fund if demolished or converted and (since 1985) for which repair, rehabilitation, and new construction is encouraged with City tax breaks, loan guarantees, loans and grants, and other incentives. [SOURCE: City of San Diego 2002 (Municipal Code, Chapter 14)]
- **San Francisco.** San Francisco history and architecture reveal a wide variety of styles and situations in the well-established category of residential hotels. Residential hotels range from low end SROs to legacy elite hotel residences [Groth (1994) 1999; San Francisco Board of Supervisors 2001].
- **Santa Cruz.** According to the City of Santa Cruz, "an SRO is a cluster of residential units of a smaller size than normally found in multiple dwellings within a residential hotel, motel, or facility providing sleeping or living facilities in which sanitary facilities may be provided within the unit and/or shared, and kitchen or cooking facilities may be provided within the unit or shared within the housing project." [SOURCE: City of Santa Cruz 2002]

Chicago. The City of Chicago classifies the “Single Room Occupancy hotel” as a type of sleeping accommodation, like other hotels and motels, and distinguishes subclasses by the proportion of units occupied as “permanent” housing. “Permanent residents” of Chicago’s formally designated SRO hotels lease rooms, typically for a year, while “transient residents”

¹²⁸ New York DHCR 1992, cited in Brownrigg (2006)

pay weekly or, rarely, monthly. (They are not “transients” in the sense of travelers, tourists, or visitors on business, rather sojourners and regulars.) In Chicago, SRO hotel units are usually rooms without kitchens, some with private bathrooms, others with shared sanitary facilities and showers. Both Chicago and New York recognize SRO hotels as a distinct legal class of hotels (Cook County Assessor’s Office, 2002). Chicago offers hotels which accept housing assistance vouchers a real estate tax break which requires their reclassification as an SRO hotel.

New York.

- **Classification.** New York defines "single room occupancy" as the occupancy by one or two persons of a single room, or of two or more rooms which are joined together, separated from all other rooms within an apartment in a multiple dwelling, so that the occupant or occupants thereof reside separately and independently of the other occupant or occupants of the same apartment. [SOURCE: New York State 1929: 16]
- **Restrictions.** New York restricts occupancy of SRO units to a maximum of one or two adults and although New York classifies SRO hotels as “commercial” hotels rather than “residential” hotels, New York stabilizes the rental rate for hotel units of any style which are occupied by legal permanent hotel residents and tenants (on leases). New York and Chicago also both have separate categories for “residential” hotels (including so-called “retirement” or “senior” hotels. The properties classified as residential or retirement in these cities mainly contain apartment units, and by law, must function as hotels by providing housekeeping, linen service, and 24-hour reception. Both cities distinguish between SRO housing units from units in SRO hotels. In New York, rental units in subdivided privately owned homes in New York City risk reclassification as “SRO” units (WNYC 2003) and into a legally protected class of “SRO” housing, whereas jurisdictions elsewhere identify rental units carved out of single family homes (and apartments) as creating licensed or unlicensed “rooming” houses.
- **Laws and regulations.** Applicable laws include New York City Local Law 19 requiring landlords to file a certificate of no harassment" (of tenants) to obtain a permit to alter or demolish a SRO unit or building. SRO buildings are subject to unique regulations. SRO buildings must provide one toilet, one washbasin, and one bath or shower for every six SRO units. Every floor on which tenants reside must have bathroom facilities. Each room has a maximum occupancy of two adults. No residents may be younger than 16 years old. Each sleeping room must have at least one window that faces outside. The manager of a SRO building is required to reside in the building. The NY State. Division of Housing and Community Renewal (DHCR) regulates rents for most SRO buildings. SRO building owners who wish to alter the number of rooms, transform rooms into apartments or alter the number of kitchen and bathroom facilities must first receive a Certificate of No Harassment from HPD. SOURCE: NYC Housing Department, HPD SRO Compliance Unit]

Ohio. The State of Ohio defines an SRO facility as "a facility with more than 5 sleeping rooms that are kept, used, maintained, advertised, or held out to the public as a place where sleeping rooms are offered on a single room occupancy (SRO) basis and is intended for use as a primary residence for residential guests staying for a period of more than 30 days....that

offer such rooms to 1 occupant with the intent of the room being the occupant's permanent residence for period longer than 30 days. Note: Various state titles and housing authorities define SRO buildings." [SOURCE: Ohio nd(2)]

Portland, Oregon. The City of Portland defines an SRO housing unit as "a one-room dwelling unit in a hotel providing sleeping, cooking, and living facilities for one or two persons in which some or all sanitary or cooking facilities (toilet, lavatory, bathtub or shower, kitchen sink, or cooking equipment) may be shared with other dwelling units." [SOURCE: City of Portland nd (City Code Chapter 29.10.F)]

Appendix I: SRO Preservation Efforts and Supportive SRO Programs outside San Francisco

Seattle was one of the first cities to address health and safety concerns. In 1970, after two deadly hotel fires, the city retroactively amended the fire and housing codes, requiring older hotels and apartments to upgrade. However, many owners could not afford to do so and, consequently, “thousands of low-cost housing units were lost, buildings were vacated, redeveloped or demolished, and the character of some of Seattle's oldest urban neighborhoods was forever changed.”¹²⁹

In December 1985, the city of San Diego passed an ordinance requiring that every SRO unit a developer converts or demolishes must be replaced, one-for-one, elsewhere in San Diego. However, exceptions were granted. In 2004, for example, a local court exempted the Maryland Hotel, a 200-plus room SRO slated to become a boutique hotel; tenants were served 30-day eviction notices.¹³⁰

Although urban renewal eliminated many SROs, some cities have been trying to increase housing options for homeless persons, including seniors, by acquiring and rehabilitating dilapidated hotels and converting them into SROs with supportive services. Services may include meals, health and nutrition education, assessment and case management, and transportation, and is typically funded by municipal sources. Some senior centers also target older residents of SROs.¹³¹

By the early 1980s, half of the hotels in Los Angeles' Skid Row (“Central City East”) had been torn down, many for parking lots, or had burned. Of the 63 SROs that remained, 18 were bought and rehabilitated by the Skid Row Housing Trust, and another 19 by a sister nonprofit, the SRO Housing Corporation. Between them, the two organizations own more than one third of all the residential rooms in the Skid Row area. One article written in 2001 describes the situation at that time:

“the Trust'renovated SRO hotels as clean and modern and architecturally stylish as anything in Beverly Hills. The hotels are relics of a venerable heritage of male transiency: Built to house the seasonal agricultural workers, ambitious adventurers, and layover railroad personnel who filled downtown Los Angeles in the early years of the 20th century, they weren't considered disreputable at the time. But their standard layout – small rooms with a bed and a dresser, communal bathrooms down the hall -- made them convenient dormitories for despondency when Central City East became a dead end instead of a way station...”¹³²

¹²⁹ McKnight (2002)

¹³⁰ Davis (2004)

¹³¹ Harahan (2006)

¹³² Rymer (2001)

The following information is from Brownrigg (2006):

“Single Room Occupancy Program (SRO), Federal (HUD). The SRO Program provides rental assistance for homeless persons in connection with the moderate rehabilitation of SRO dwellings. SRO housing contains units for occupancy by one person. These units may contain food preparation or sanitary facilities, or both.

The Single Room Occupancy (SRO) program is authorized by § 441 of the McKinney-Vento Homeless Assistance Act. Under the program, HUD enters into Annual Contributions Contracts with public housing agencies (PHAs) in connection with the moderate rehabilitation of residential properties that, when rehabilitation is completed, will contain multiple single room dwelling units. These PHAs make Section 8 rental assistance payments to participating owners (i.e., landlords) on behalf of homeless individuals who rent the rehabilitated dwellings. The rental assistance payments cover the difference between a portion of the tenant's income (normally 30%) and the unit's rent, which must be within the fair market rent (FMR) established by HUD. Rental assistance for SRO units is provided for a period of 10 years. Owners are compensated for the cost of some of the rehabilitation (as well as the other costs of owning and maintaining the property) through the rental assistance payments. To be eligible for assistance, a unit must receive a minimum of \$3,000 of rehabilitation, including its prorated share of work to be accomplished on common areas or systems, to meet housing quality standards (HQS). Assistance provided under the SRO program is designed to bring more standard SRO units into the local housing supply and to use those units to assist homeless persons. The SRO units might be in a rundown hotel, a Y, an old school, or even in a large abandoned home.

Supportive Single Room Occupancy Residences (“supportive SRO”), New York. Supportive SROs provide permanent housing in a single room occupancy building where tenants receive leases. Supportive SRO residential buildings are typically owned and operated by nonprofit organizations. On site mental health and social services are funded by state agencies, including the Department of Mental Health (DMH), the HIV/AIDS Services Administration (HASA), the Department of Homeless Services (DHS), among others. Supportive SROs often specialize in an exclusive category of eligible residents, and only house, for example, people certified as mentally ill, or AIDS patients, or recovering from substance abuse, or low income elderly. Other supportive SROs receive a mix of tenants. The rent (housing service) payment is set at Social Security Insurance Level I (known as the “community level”). Residents receiving social security disability or retirement generally pay between \$200 and \$250 per month rent; residents on New York Public Assistance (“PA”) pay the “shelter allowance”.

Supportive SRO Subtypes (New York).

- **Single Room Occupancy Community Residences (SRO/CRs).** License limits size to 100 beds; usually residents have their own bedroom and share bathrooms; some SRO/CRs have efficiency apartments. Those eligible for residence must be NYC/NYS certified with a mental illness or certified to have spent 14 days in prior 2 months in a NYC shelter. Rent/services payment is at SSI Level II.
- **Private Proprietary Home for Adults (PPHA).** A permanent boarding residence housing licensed by the NYS Department of Health to house 50-400 residents in doubles sharing a bathroom, usually a mixed population of the elderly and the

medically or psychiatrically ill or physically disabled. Residents are required to be served three meals a day, some housekeeping, and 24 hour staffing. (Various PPHA offer additional on-site services, from medical supervision to organized social dancing.) Most PPHAs operate as for-profit businesses, accept SSI or PA Level II rent, directly receive residents' checks, and deduct for rent, food, laundry, and other services.

- **Residences for Adults (RFA).** Non-profits licensed by the New York State Department of Health which house residents in single or double rooms, and provide meal, housekeeping, linen, 24 hour staffing and supportive services. RFAs combine the model of the Supportive SRO and the PPHA. Payment for rent and services is SSI Level II.

NOTE: New York City outlawed construction of new for-profit SROs residential buildings in the late 1950s and occupancy of SROs by families with children or children under age 16 in the early 1960s. Since the early 1990s, these and other laws and tax incentives favored the conversion of former hotels, rooming houses, lodging houses, and SRO buildings by non-profit organizations into supportive housing under the New York State Single Room Occupancy Support Services Program. By 1996, 225 community-based nonprofit groups owned and managed over 50,000 housing units in the City. The first new construction "SRO" in New York City -- studio apartments units with kitchens and baths, a common dining hall, and social assistance opened in 2000 as supportive housing for elderly military veterans."

Appendix J: Selected Photos



Tenderloin SRO.



Tenderloin SRO.



Kitchen in Chinatown SRO.



Bathroom in Chinatown SRO.

Works Cited

- Brownrigg, Leslie A. "People Who Live in Hotels: An Exploratory Overview." Statistical Research Division, U.S. Census Bureau, May 31 2006.
(<http://www.census.gov/srd/papers/pdf/ssm2006-03.pdf>)
- Carter, Tom. "Mailboxes Still Not Installed in All SROs." Central City Extra, August 2008.
(<http://studycenter.org/test/cce/issues/81/ccx.81-cALL.pdf>)
- Cell, Kelci 1998 Single Room Occupancy hotels (San Francisco). <http://www.media-alliance.org/archives/housing/singleroom.html/> [cited in Brownrigg]
- Davis, Kelly 2004 Maryland Hotel suit challenges City Council to take action, San Diego City Beat. <http://www.sdcitybeat.com/article.php?id=1031/> [cited in Brownrigg]
- Dolbear, Cushing. "Housing Policy: A General Consideration" in Homelessness in America. Phoenix: Oryx Press, 1996. [cited in Brownrigg]
- "Downtown Plan Monitoring Report—Chapter 3: Downtown Support Services." San Francisco Planning Department, 2004.
(<http://www.sfgov.org/site/uploadedfiles/planning/Citywide/pdf/Chapter%20Three.pdf>)
- Groth, Paul. Living Downtown: The History of Residential Hotels in the United States. Berkeley, CA: The University of California Press, 1994.
- Harahan, Mary F., Alisha Sanders, and Robyn Stone. "Inventory of Affordable Housing Plus Services Initiatives for Low- and Modest-Income Seniors." Institute for the Future of Aging Services, American Association of Homes and Services for the Aging, prepared for U.S. Department of Health and Human Services and U.S. Department of Housing and Urban Development, August 2006.
- Koegel, Paul, et al. "The Causes of Homelessness" in Homelessness in America. Phoenix: Oryx Press, 1996. [cited in Brownrigg]
- Levinson, David. Encyclopedia of Homelessness. Thousand Oaks, CA: Sage, 2004.
- "Mailboxes Still Not Installed in All SROs", Central City Extra, August 2008
(<http://studycenter.org/test/cce/issues/81/ccx.81-cALL.pdf>)
- McKnight, Reuben 2002 The legacy of the Ozark ordinance, Preservation Seattle (on line magazine, October 2002).
<http://www.cityofseattle.net/commnity/histsea/preservationseattle/publicpolicy/default.toct.htm> [cited in Brownrigg]
- National Alliance to End Homelessness (NAEH) "Local Implementation of 10 Year Plans to End Homelessness." NAEH Conference—Training Institute, July 11 2005.

(<http://www.homebaseccc.org/PDFs/TenYearPlanng/NAEH%20Master%20Leasing%20Key%20Concepts.pdf>)

Regulatory Barriers Clearinghouse. "Single Room Occupancies." Breakthroughs (HUD User, U.S. Department of Housing and Urban Development) 7.6 (November 2008).

Rymer, Russ 2001 Rules of the row, Mother Jones (March/April 2001). Posted as <http://www.motherjones.com/news/feature/2001/03/skidrow.html/> [cited in Brownrigg]

"San Francisco General Plan: Housing Element." San Francisco Planning Department, May 13 2004. (http://www.sfgov.org/site/planning_index.asp?id=41412)

"San Francisco Housing Inventory 2005." San Francisco Planning Department, October 2006. (http://www.sfgov.org/site/uploadedfiles/planning/Citywide/pdf/Housing_Inventory_2005_web.PDF)

"San Francisco Housing Inventory 2007." San Francisco Planning Department, April 2008.

"The San Francisco Plan to Abolish Chronic Homelessness." San Francisco Ten Year Planning Council, 2004. (<http://sfgov.org/site/uploadedfiles/planningcouncil/news/TheSFPlanFinal.pdf>)

San Francisco Office of the City Attorney, "U.S. Supreme Court Hears Arguments in San Remo Hotel Case Today." March 28 2005. (http://www.sfgov.org/site/cityattorney_page.asp?id=30854)

Single Room Occupancy Hotel Safety & Stabilization Task Force (http://www.sfgov.org/site/sro_index.asp)

Stewart B. McKinney Homeless Assistance Amendments Act of 1992. 24CFR887.481 §. 887.481 Single room occupancy (SRO): Definition, pages 175-176, IN: Title 24 -Housing and Urban Development, Chapter VIII Office of the Assistant Secretary for Housing, Federal Housing Commissioner, Department of Housing and Urban Development, Part 887, Housing Vouchers, Table of Contents, Subpart J Special Housing Types.

Tipton, Mark, Paige Alderete and Stephen Flaherty. "Human Services Agency: Care Not Cash Is Achieving Its Goals." San Francisco: City and County of San Francisco, Office of the Controller, City Services Auditor, 2008.

Wright, James and Beth Rubin 1997. Is homelessness a housing problem? IN: Understanding homelessness: new policy and research perspectives. Washington, D.C.: Fannie Mae Foundation. [cited in Brownrigg]

A Survey of Private SRO Owners

A Report for the San Francisco Human Services Agency
San Francisco, CA

By William Leiter and Michael Shen

Summer 2009

Table of Contents

Executive Summary.....	2
Introduction.....	3
Findings.....	5
Chinatown and Tenderloin Neighborhood Profiles.....	10
Recommendations.....	13
Appendices.....	16

Executive Summary

This report provides a description of privately-run SROs in San Francisco. The study had two purposes; the first was to learn about the residents and business model of privately-run SROs and the second was to gauge the interest of these SROs in collaboration with the city. Such collaboration has the potential to better meet the social service needs of the estimated 18,543 SRO residents in San Francisco and to expand public housing programs.¹

SF-HSA designed a one page, ten-question survey instrument that addressed the types and needs of residents, the cause and number of vacancies, the average length of stay, interest in collaboration with SF-HSA, and hotel contact information. SF-HSA mailed the survey to the owners of all 441 properties in San Francisco that the Planning Department classifies as privately-run SROs. The SROs are divided by location into five groups - Chinatown, Mission, SOMA, Tenderloin, and Other. SF-HSA printed the survey on SF-HSA letterhead and included a cover letter explaining the purpose of the study and a one-page sheet with contact information for city social service programs.

SF-HSA mailed surveys to 441 hotels and 82 completed the survey while 25 said that the survey did not apply to their property, yielding a 24% response rate; 14 were returned to sender. The key findings regarding privately-run SROs include:

- Almost 90% have residents that are seniors, while roughly a quarter have children, people with physical disabilities, and people with mental health needs
- 37.8% have unwanted vacancies, but the median vacancy rate is 0% - 10%
- 52.4% have an average length of resident stay of one year or more
- 51.2% are interested in some type of collaboration to better serve the social service needs of residents

This study is part of a preliminary effort by SF-HSA to learn more about privately-run SROs. To continue these efforts, this study recommends that SF-HSA:

- Refine the definition of SRO to focus on buildings that contain primarily SRO units and refine the language used to describe SROs to avoid confusion.
- Follow up with the SROs that expressed interest in partnerships, beginning with the Tenderloin, to learn more about their specific interests.
- Consider partnering with Tenderloin SROs to expand public housing options in San Francisco.
- Continue to research SROs and focus on their business models, strategies for contacting ownership, their attitudes towards the city, and vacancies.

¹ Fribourg, Aimee. 21.

Section I. Introduction

A. Purpose

The purpose of this study is twofold. First, SF-HSA aimed to learn about the residents and business model of privately-run SROs. Second, SF-HSA aimed to gauge the interest of these SROs in collaboration with the city. This study is one of the preliminary steps in SF-HSA's attempt to explore partnerships with privately run SROs to benefit low-income residents. It builds upon the work of Aimee Fribourg, who conducted an Advanced Policy analysis of SROs for the Planning Unit as part of a program of professional education at the Goldman School of Public Policy, UC Berkeley.

B. Context

The demand for affordable housing in San Francisco far exceeds the supply. Vulnerable populations such as families with children, seniors, adults with disabilities, adults with mental health needs, and other public service recipients are often at risk for homelessness. SROs account for a substantial portion of San Francisco's affordable housing stock and are thus home to many of SF-HSA's clients, making them an important part of SF-HSA's efforts to reduce homelessness and better serve clients.²

The Department of Planning defines an SRO as any unit "consisting of no more than one occupied room with a maximum gross floor area of 350 square feet. ... The unit may have a bathroom in addition to the occupied room."³ A typical SRO unit does not have a kitchen and often does not have a private bathroom. The Planning Department considers any building with one or more SRO units to be an SRO building.⁴ Though some SROs are apartment buildings, many are residential hotels that house a mix of long-term residents, short-term residents, and tourists.

Most of San Francisco's SROs were built in the early decades of the 20th century, have less than 40 units, and average rents from \$500 to \$600. There are 530 SROs in San Francisco, with the largest concentration in Chinatown and the Tenderloin.⁵ Forty-three of these hotels have a relationship with the city through SF-HSA's Single Adult Supportive Housing program (SASH) or the Department of Public Health's Direct Access to Housing program (DAH); an additional 46 are owned or operated by non-profits. The remaining 441 hotels are privately-owned and operated.

A 2009 HSA report concluded that privately-owned SROs "represent opportunities for mutually beneficial partnerships between service providers and hotel owners." However, SF-HSA has little information about the residents, physical environment, and operations of privately-owned SROs compared to those affiliated with SASH, DAH, and non-profits. Because so many current and potential HSA clients live in privately-owned SROs, it is in HSA's interest to learn more

² Fribourg, Aimee. 3.

³ Department of Planning Code Sec. 890.88.

⁴ Ibid.

⁵ Fribourg, Aimee. 21.

about them, and possibly to pursue partnerships. Accordingly, the 441 privately-owned and operated SROs in San Francisco will be the focus of this study.

C. Methodology

SF-HSA designed a one page, double-sided survey instrument with 10 questions (**Appendix A.**) Specifically, the instrument addressed the types and needs of residents, the cause and number of vacancies, the average length of stay, interest in collaboration with HSA, and hotel contact information. The instrument also asked hotel owners or managers to consult with members of their staff if they did not feel they had sufficient information to answer any of the questions. SF-HSA developed the survey with the help of members of the Planning Unit.

Possible mistrust between hotel owners and the city necessitated that SF-HSA select topics and word questions with care. For example, owners may conflate the intentions of HSA, which are to better serve residents, with those of the Department of Building Inspection or other agencies that enforce regulations. There is also a perception among residents and their advocates that privately-owned SROs have more crime and disturbances, and are in worse repair, than city-leased non-profit SROs.⁶ As a result of this mutual suspicion, and to encourage frank responses, SF-HSA designed the survey to be as short and unobtrusive as possible.

SF-HSA mailed the survey to the owners of all 441 privately-run SROs in San Francisco. SF-HSA generated the list of hotels and owner addresses from the Planning Department's and Office of the Assessor-Recorders' data. In some cases one person or company owned multiple SROs, and in those cases SF-HSA sent one mailing per hotel. The survey was sent on SF-HSA letterhead and also included a cover letter from William Leiter and Michael Shen, two student-interns, explaining the purpose of the study (**Appendix B.**) Lastly, each mailing included one of five versions, depending on the location of the hotel, of a one page "Guide to San Francisco's Social Services" with contact information for city agencies and programs (**Appendix C.**)

After waiting for responses to the first round of mailing, SF-HSA conducted follow up phone calls to all non-respondents to confirm or update the owners' contact information. SF-HSA then sent a second round of mailings to the 370 SRO owners for which SF-HSA had yet to receive a response. In this second mailing SF-HSA amended the cover letter to instruct SRO managers that they, and not just the owner, should feel free to answer the survey as well. Three hotels called us to do the survey over the phone, and others called to say that the survey did not apply to their property.

SF-HSA divided the hotels into five subgroups based on their location – Chinatown, the Mission, SOMA, Tenderloin, and Other. Using the Planning Department's neighborhood definitions:⁷

- Chinatown includes Chinatown, the Financial District, North Beach, and Russian Hill.
- The Mission includes only the Mission.
- SOMA includes only South of Market.
- The Tenderloin includes Downtown, the Civic Center, and Nob Hill.
- Other includes all other parts of San Francisco.

⁶ Fribourg, Aimee. 33.

⁷ This is the same neighborhood classification system used in Aimee Fribourg's 2009 SRO report.

Section II. Findings

A. Response Rate

SF-HSA mailed surveys to 441 hotels and 82 completed the survey while 25 said that the survey did not apply to their property, yielding a 24% response rate; 14 were returned to sender (**Figure 1.**) *Chinatown SROs were the most responsive to the survey, while Tenderloin SROs were the least responsive.* The 25 respondents who said the survey did not apply most frequently reported that the property was vacant or under renovation; 9 did not offer an explanation. Other explanations included that the property was a dormitory, an apartment building, a single family home, or a tourist hotel.

Figure 1: Survey response rate data

Neighborhood	Percent that completed the survey	Percent that said the survey did not apply	Percent that were returned to sender
Chinatown (n = 132)	25.0	3.0	1.5
Mission (n = 41)	19.5	2.4	4.9
SOMA (n = 46)	17.4	4.3	0.0
Tenderloin (n = 164)	13.4	4.9	3.7
Other (n = 58)	19.0	17.2	6.9
TOTAL (n = 441)	18.6	5.7	3.2

This was SF-HSA’s first attempt to reach out to owners of privately run SROs, and the resulting lack of familiarity likely depressed the response rate. The response rate was also due, at least in part, to the complicated nature of SRO ownership. Most privately-run SROs are owned by INCs, CORPs, LLCs, LTDs, LPs, or family trusts.⁸ While the Office of the Assessor-Recorder had owner information for all of the hotels, the opaque nature of these organizations complicates the use of these records. Some surveys were returned from addresses that did not match the address to which SF-HSA sent it, or were returned from a person or legal entity that was not in the records at all. Accordingly, a number of the surveys presumably went through layers of management, changing hands and even location.

While SF-HSA will report findings for all four neighborhoods and “Other,” it is important to note that only Chinatown and the Tenderloin had more than a dozen respondents. This was not due to substantially lower response rates, but instead the comparatively small number of SROs in these groups. Due to the small number of respondents, SF-HSA will focus less on SROs in the Mission, SOMA, and “Other” and figures for these groups should be taken with caution.

B. Residents and their Social Service Needs

Eighty of the respondents indicated the type of residents that live in their hotel, while two said that they did not know (**Figure 2.**) Because HSA believes that it has many clients living in SROs, this question attempted to determine what types of clients, and thus what types of services, are most common. *SF-HSA found that a large majority of SROs have senior and single*

⁸ Fribourg, Aimee. 32.

adult residents, and that roughly 25% of hotels are home to physically disabled persons, families with children, or people with mental health needs.

The high number of families and children in Chinatown indicates that its SROs are the most mixed of any neighborhood. For example, only about a fifth of Tenderloin SROs with single adults also reported having families with children, while in Chinatown almost half of the SROs with single adults also reported having families with children.

Figure 2: Type of residents in SROs

Neighborhood	Percent of responding SROs with residents of this type				
	Single adults	Seniors	Physically disabled	Families with children	People with mental health needs
Chinatown (n=33)	87.9	97.0	18.2	45.5	18.2
Mission (n = 8)	100.0	75.0	25.0	12.5	50.0
SOMA (n = 8)	100.0	87.5	37.5	12.5	50.0
Tenderloin (n =22)	86.4	77.3	27.3	18.2	31.8
Other (n = 11)	90.9	81.8	27.3	18.2	9.1
TOTAL (n = 82)	90.2	86.6	24.4	29.3	28.0

SF-HSA also asked respondents to select which of a number of social services would benefit their residents (**Figure 3.**) *The most commonly cited services, overall, were medical care and counseling. However, 37 respondents, or 45.2%, said that they did not know which services would benefit their clients; this was particularly common in the Tenderloin, where 13 of the 22, or 59.1%, answered that they did not know which services would benefit their clients. Another 9 respondents, or 11.0%, skipped the question altogether.*

Figure 3: Social services that would benefit SRO residents

Percent of responding SROs with residents that would benefit from	Chinatown (n=33)	Mission (n = 8)	SOMA (n = 8)	Tenderloin (n = 22)	Other (n = 11)	TOTAL (n = 82)
Medical care	24.2	37.5	50.0	9.1	18.2	23.2
Counseling	21.2	50.0	50.0	22.7	18.2	26.8
Childcare	30.3	25.2	0.0	0.0	18.2	6.1
Transportation	21.2	12.5	12.5	4.5	36.4	17.1
In-home assistance	6.1	0.0	12.5	9.1	9.1	7.3
Job training or placement	9.1	12.5	0.0	4.6	18.2	8.5
English classes	21.2	0.0	0.0	4.6	18.2	12.2
Help with food	9.1	12.5	12.5	4.6	18.2	9.8
Social activities/recreation	9.1	37.5	12.5	4.6	91.	11.0

A number of services received starkly different responses in different neighborhoods. For example, almost three times as many respondents in Chinatown thought medical care would be beneficial as did in the Tenderloin; and nearly five times as many respondents in Chinatown said transportation and English classes would be beneficial as did in the Tenderloin. *Finally, The*

large number of seniors, combined with the large interest in transportation services, suggests isolation is an issue for SRO residents in Chinatown.

C. The Privately-run SRO Business Model

SF-HSA wants to learn about the business models of privately-run SROs and SF-HSA asked owners a series of questions on this topic. These questions build upon analysis of vacancy rates from a previous SF-HSA report, which estimated that the average vacancy rate was 27.3%.⁹

SF-HSA first asked if the hotel has unwanted vacancies (**Figure 4.**) SF-HSA included the term “unwanted” because some hotels purposefully keep rooms that are not up to code vacant to avoid paying for renovations. In addition, a related study of SRO desk clerks found that some hotel operators turn away clients that they deem too “rough” for the hotel, or in other words choose to keep rooms vacant to avoid disturbances.¹⁰ Accordingly, SF-HSA sought to measure only the number of unwanted vacancies. *SF-HSA found that 37.8% of responding hotels had unwanted vacancies; this number is substantially higher in the Tenderloin and substantially lower in Chinatown.*

Figure 4: Unwanted vacancies

Neighborhood	Percent of responding SROs with unwanted vacancies	Percent of responding SROs with no unwanted vacancies	Percent of responding SROs that did not answer
Chinatown (n = 33)	27.3	72.7	0.0
Mission (n = 8)	50.0	50.0	0.0
SOMA (n = 8)	50.0	37.5	12.5
Tenderloin (n = 22)	59.1	36.4	4.5
Other (n = 11)	9.1	72.7	18.2
TOTAL (n = 82)	37.8	57.3	4.9

To provide a more detailed picture of vacancy rates, SF-HSA also asked respondents to report the average vacancy rate in their hotel (**Figure 5.**) Forty to 50% was an option for this question, but no respondents selected it and it is thus excluded from the table. Only one respondent, from the “Other” subgroup, did not answer this question. *The Tenderloin was the only neighborhood with a median average vacancy rate above 0% - 10%.*

⁹ Fribourg, Aimee. 21.

¹⁰ “A Survey of Desk Clerks in Private Tenderloin SROs.” Leiter, William and Shen, Michael. San Francisco Human Services Agency, 2009.

Figure 5: Average vacancy rates

Neighborhood	Number of responding SROs with an average vacancy rate of				
	0% - 10%	10% - 20%	20% - 30%	30% - 40%	Above 50%
Chinatown (n = 33)	30	3	0	0	0
Mission (n = 8)	3	3	1	1	0
SOMA (n = 8)	4	2	1	1	0
Tenderloin (n = 22)	10	8	3	1	0
Other (n = 10)	5	2	1	1	1
TOTAL (n = 81)	52	18	6	4	1

SF-HSA also asked owners what factors contribute to unwanted vacancies in their hotels. *The most frequently cited factors in every neighborhood were frequent turnover of residents and insufficient demand for units (Figure 6.)* The low response rate for this question is likely due to a number of SROs that reported a 0% - 10% vacancy rate having no factors that contribute to unwanted vacancies.

Figure 6: Factors contributing to vacancy

Neighborhood	Percent of responding SROs that cited it as a cause of vacancies				Percent that did not answer
	Frequent turnover of residents	Prefer to maintain lower resident population	Insufficient demand for units	Unable to make necessary repairs to units	
Chinatown (n = 33)	21.2	0.0	9.1	6.1	54.5
Mission (n = 8)	75.0	0.0	12.5	0.0	12.5
SOMA (n = 8)	75.0	0.0	25.0	0.0	25.0
Tenderloin (n = 22)	63.6	4.5	31.2	0.0	13.6
Other (n = 11)	27.3	0.0	27.3	9.1	27.3
TOTAL (n = 82)	43.9	1.2	19.5	3.7	32.9

Finally, SF-HSA asked respondents to report the average length of stay in their hotel (**Figure 7.**) This question provides insight into whether SROs rely on short or long term residents. This was an open ended question, and to quantify the answers SF-HSA divided them into discrete categories, though some answers were too vague to be quantified. *The most commonly reported average length of stay was 1 year or more, particularly in Chinatown, while Tenderloin SROs most frequently answered a month to a year.*

Figure 7: Average length of stay

Neighborhood	Percent of responding SROs with an average length of stay of				Percent that did not answer
	Less than a month	A month to a year	1 year or more	Could not quantify	
Chinatown (n = 33)	3.0	3.0	81.8	0.0	12.1
Mission (n = 8)	0.0	12.5	50.0	12.5	25.0
SOMA (n = 8)	12.5	37.5	12.5	25.0	12.5
Tenderloin (n = 22)	18.2	45.5	27.3	0.0	9.1
Other (n = 11)	0.0	18.2	45.5	9.1	27.3
TOTAL (n = 82)	7.3	20.7	52.4	4.9	14.6

D. Collaboration with SF-HSA or CBOs

SF-HSA asked hotel owners what types of partnerships that connect residents to social services would interest them (**Figure 8.**) SF-HSA did not specify the options as partnerships with SF-HSA, but instead described the nature of the partnership and did not mention the partnering organization. While SF-HSA designed the question with partnerships with SF-HSA in mind, CBOs might also be promising candidates for partnerships with SROs, especially since many CBOs already do this.

Figure 8: Interest in partnerships to better serve the needs of residents

Neighborhood	Percent of responding SROs reporting interest in			Percent that did not answer
	Receiving information about social services	Receiving free training for ownership and staff	Having social service providers visit the hotel	
Chinatown (n = 33)	33.3	12.1	12.1	66.7
Mission (n = 8)	50.0	25.0	50.0	12.5
SOMA (n = 8)	75.0	37.5	37.5	12.5
Tenderloin (n = 22)	54.5	13.6	31.8	31.8
Other (n = 11)	18.2	0.0	9.1	81.8
TOTAL (n = 82)	42.7	14.6	23.2	48.8

Overall, a slight majority of responding SROs, 51.2%, expressed interest in some type of partnership to better serve the needs of residents. SROs in the Tenderloin are substantially more interested in partnerships than those in Chinatown, and they most frequently reported interest in receiving additional information about social services. Three of the respondents that did not select any of the options noted that HSA should contact them to discuss this matter, and another wrote that they did not know the answer.

Section III. Neighborhood Profiles

This section contains profiles of the two neighborhoods with the highest concentration and number of SROs, Chinatown and the Tenderloin. SF-HSA analyzed these two neighborhoods separately because, together, they constitute over two thirds of the respondents and are quite distinct from one another. SF-HSA did not profile the Mission and SOMA because of the small sample size, and did not profile “Other” because it is simply a catch-all for SROs that are not in one of the four neighborhoods.

A. Chinatown

SF-HSA mailed the survey to 132 hotels in Chinatown and 33 of those completed it; five replied that it did not apply to them and three were returned to sender. The study found that responding SROs from Chinatown have more families and senior citizens than in other neighborhoods, have more mixed populations in terms of age, and that residents tended to stay in the hotels for longer periods of time. Also, a lower than average percent of SROs in Chinatown have residents with physical disabilities or mental health needs.

The SROs in Chinatown have a distinct business model, operating more like long-term apartments. A lower than average percent of SROs in Chinatown reported unwanted vacancies and the neighborhood had the lowest median vacancy rate in this study. This is, perhaps, a result of Chinatown SROs having the longest average length of stay.

While Chinatown SROs were the most responsive to the survey, they were also the least interested in partnerships to better serve the needs of residents. Two thirds of Chinatown respondents said they were not interested in any type of partnership.

These findings are consistent with Fribourg’s analysis of Chinatown SROs.¹¹ Her report argued that the large number of families and seniors, and the longer average length of stay, are due to strong community support networks in Chinatown. She also noted that the community tends to be “insular and not touch the mainstream systems,” which supports the finding that they are less interested in partnering with SF-HSA or CBOs to better serve residents.

In terms of social service needs, a higher than average percent of Chinatown SROs reported that residents would benefit from childcare, transportation, and English classes. The combination of seniors and the desire for transportation services also suggests that isolation is a problem in Chinatown SROs. These findings are consistent, respectively, with the higher number of children and seniors and the large number of Chinese immigrants in the neighborhood. Four of the respondents from Chinatown also noted on the survey that information about social services needs to be bilingual to be helpful to residents.

¹¹ Fribourg, Aimee. 25.

Figure 9: Chinatown SROs compared to non-Chinatown SROs

Characteristic	Percentage of Chinatown SROs reporting	Percentage of non-Chinatown SROs reporting
Families with children	45.5	18.4
Seniors	97.0	80.0
Residents with physical disabilities	18.2	28.6
Residents with mental health needs	18.2	34.7
Residents that would benefit from English classes	21.2	6.1
Residents that would benefit from childcare	30.3	8.2
Residents that would benefit from transportation services	21.2	14.3
Unwanted vacancies	27.3	44.9
Average vacancy rate of 0% - 10%	90.9	44.9
Average length of stay of 1 year or more	81.8	32.7
Interest in a partnership to better serve residents	33.3	63.3

B. The Tenderloin

SF-HSA mailed the survey to 64 SROs in the Tenderloin and 22 completed it; eight responded that it did not apply and six were returned to sender. SF-HSA found that a higher than average percent of Tenderloin SROs have residents with physical disabilities or mental health needs. Tenderloin SRO residents are also more transient; the hotels reported a shorter than average length of stay and desk clerks knew less about their residents, more frequently responding that they did not know which services would benefit them. Despite this, Tenderloin SROs reported the most interest in partnerships to better serve the needs of residents.

Fewer Tenderloin owners than in any other neighborhood responded that their residents would benefit from medical care and transportation. The latter is likely due to the density of the neighborhood, but the former may suggest that the Tenderloin SRO population is younger and thus in less need of medical services. While 90.0% of non-Tenderloin SROs reported having seniors, only 77.3% did in the Tenderloin. It should also be noted, however, that Tenderloin owners were also the least likely to know about the needs of their residents.

Tenderloin SROs have higher vacancy rates and more unwanted vacancies than SROs on average. These vacancies are likely due to more frequent resident turnover and less demand for rooms, which were frequently cited as causes of vacancies.

The combination of high vacancy rates, interest in partnerships, and the preponderance of neighborhood support services makes Tenderloin SROs promising candidates for partnerships with SF-HSA to better serve the needs of residents.

Figure 10: Tenderloin SROs compared to non-Tenderloin SROs

Characteristic	Percentage of Tenderloin SROs reporting	Percentage of non-Tenderloin SROs reporting
Seniors	77.3	90.0
Residents with physical disabilities	27.3	23.3
Residents with mental health needs	31.8	26.7
Don't know what services would benefit residents	59.1	40.0
Interest in a partnership to better serve residents	68.2	45.0
Unwanted vacancies	59.1	30.0
Average vacancy rate of 0% - 10%	45.5	70.0
Average length of stay of 1 year or more	27.3	61.7
Frequent resident turnover as a cause of vacancies	63.6	36.7
Insufficient demand for units as a cause of vacancies	31.2	15.0

Section IV. Recommendations

A. Refine the definition and description of SROs

Twenty-five hotels, or 5.7%, said the survey did not apply to them. This figure is likely an under representation since it is easier for someone in that position to discard the survey than to contact SF-HSA and explain why it does not apply. While the survey did not apply to some hotels because they are vacant or under renovation, there is also confusion regarding what qualifies as an SRO, and how to describe those properties.

HSA should refine the way it defines SROs. This survey used the Planning Department's list of SROs, but because this list defines any building with one or more SRO units as an SRO, many of the buildings on it contain primarily non-SRO units.¹² A related survey of desk clerks in the Tenderloin, which used this same list, found that staff at 13% of the properties considered it an apartment building instead of an SRO.¹³ This study therefore contends that some of the owners who said this survey did not apply, without explanation, consider the property an apartment building.

To maximize outreach to clients, HSA should focus on buildings that contain primarily SRO units. The Planning Department already has data on the number of SRO units, tourist units, and non-SRO residential units for roughly 75% of the buildings it classifies as SROs, and has at least partial information for all of the buildings. *SF-HSA should not consider buildings with less than a minimum percentage of SRO units to be SROs.* The aforementioned survey of SRO desk clerks recommended that properties be at least 43.2% SRO units to qualify as an SRO.¹⁴

Another way to narrow the list of SROs would be to define as SROs only those properties that have a minimum bathroom to room ratio. While low-income SROs do not typically have private bathrooms, more upscale SROs that resemble apartments typically do.

HSA should also refine the way it describes SROs. SF-HSA used the term "residential hotel" in the cover letter (**Appendix B**) to avoid negative connotations associated with the term "SRO." However, this confused owners of properties that fit SF-HSA's SRO profile in that they have SRO units and house low-income tenants. There were two respondents that said their property is "not a hotel" yet answered most or all of the questions, and there was one respondent that said his property is an SRO, not a hotel. The source of this confusion is not the nature of the property, but the language SF-HSA used to describe it.

SF-HSA cannot determine with certainty why these properties do not consider themselves residential hotels, but SF-HSA would, nonetheless, consider at least some of them to be SROs. *In order to reach these properties, HSA will need to use language other than "residential hotel." The most inclusive language will refer to an owner's "residential hotel, apartment building, or SRO."*

¹² Department of Planning Code Sec. 890.88.

¹³ Leiter, William and Shen, Michael.

¹⁴ Leiter, William and Shen, Michael.

B. Continue outreach to SROs that expressed interest in partnerships

All of the 42 SROs that expressed interest in some type of partnership, as well as 13 that did not, provided information for someone SF-HSA can contact to discuss partnerships in further detail.

Given that it is often difficult to determine the contact point for SRO outreach, this is valuable information. SF-HSA will provide the Planning Unit with the list of hotels that expressed interest, and *SF-HSA should follow up with these hotels to pursue partnerships.*

Over two-thirds of Tenderloin SROs reported interest in at least one type of partnership.

Eighteen of 22 Tenderloin SROs, or 81.2%, provided contact information for someone SF-HSA can contact to discuss partnerships in more detail. The owners of Tenderloin SROs were also the least likely to know what type of social services would benefit their residents. *This suggests there is more potential in the Tenderloin than in any other neighborhood for SF-HSA to help SRO staff assist residents, and to directly provide assistance to residents.*

While SRO residents in Chinatown also stand to benefit from partnerships between SROs and HSA, the need for all outreach to be bilingual and the lack of interest, contact information, and desk clerks means that outreach efforts in Chinatown will encounter more obstacles than efforts in the Tenderloin. As a result, *SF-HSA ought to begin SRO outreach in the Tenderloin.*

SF-HSA should begin outreach by contacting the designated person at hotels that are interested in partnerships. SF-HSA will then need to determine which services are most in demand, yet since almost half of respondents did not know what services would benefit their residents this may necessitate reaching out to residents directly or through hotel staff. With this in hand SF-HSA can tailor its outreach and partnership efforts to the needs of SRO residents.

The specific nature of these partnerships is outside the scope of this study. However, SF-HSA should consider the following:

- Require that SROs partner with SF-HSA in some form to be eligible for resident placement through city programs like the Homeless Outreach Team (HOT)
- Research the Community Housing Partnership's SRO desk clerk training program for guidance in how to train clerks.
- Develop a packet of information about eligibility for, and access to, social services. This information could be given to residents directly or through hotel staff.
- Offer to assist SROs in repairing damaged units and bathrooms. SF-HSA could use its workforce development abilities to, for example, install grab bars in bathrooms in Chinatown to help prevent seniors from falling.

C. Consider partnering with Tenderloin SROs to increase public housing stock

One of the motivating factors behind this study was Fribourg's claim that the average vacancy rate in San Francisco SROs was 27.3%.¹⁵ While this study found vacancy rates in SROs to be lower, it still found that many SROs have a significant number of vacant rooms (**Figures 4 and 5.**) Specifically, if one excludes Chinatown, almost 45% of SROs have unwanted vacancies; more than half of Tenderloin SROs have unwanted vacancies and the median vacancy rate in the neighborhood is 10% - 20%. These unwanted vacancies are, primarily, due to resident turnover and insufficient demand for units.

¹⁵ Fribourg, Aimee. 21.

The description of these vacancies as “unwanted” suggests that ownership wants to rent the units, and thus might be amenable to SF-HSA efforts to help them do so. Such a partnership would help to connect SROs to those who are seeking low-income housing and reduce resident turnover. Accordingly, *SF-HSA should consider SROs, particularly in the Tenderloin, as potential partners to expand public housing programs.*

However, these findings are preliminary. SF-HSA will need to conduct further research that specifically asks SRO owners about such a partnership. In addition, SF-HSA will likely need to create a set of eligibility criteria for an SRO to partner with the city. Yet given the popularity of the housing first approach to homelessness in San Francisco, housing partnerships with Tenderloin SROs deserve, at least, further consideration.

D. Continue to research SROs to develop a database of information

This survey, and a related survey of SRO desk clerks, is a preliminary effort to learn more about SROs, and SF-HSA will need to continue researching these issues. SF-HSA should aggregate the information it currently has about SROs in a database and continue to augment it. This study recommends that SF-HSA research the following:

1. *The business model of privately-run SROs.*
SF-HSA lacks information about the profitability and property values of SROs. One clerk said that his hotel was not profitable, as did others in the desk clerk survey. This suggests that SF-HSA needs to know more about the business motivations of owners, which would shed light on the incentives of owners to partner with SF-HSA.
2. *Contact points at SROs*
This study acquired contact information for 48 hotels, but even with this information it is difficult to determine the best way, as a general rule, to conduct outreach to SROs. While desk clerks serve as the eyes and ears of SROs, the decision regarding partnerships presumably rests with managers or owners.
3. *What vacancy means to an SRO*
While this survey asked a number of questions about vacancies, it did not define what qualifies as a “vacant” room. It is unclear whether ownership would consider a room that is sporadically rented for short-periods of time as vacant. This will help SF-HSA determine in what ways it can create partnerships that are also beneficial to ownership.
4. *SRO staff and owner attitudes towards the city*
To most effectively serve the needs of SRO residents, SF-HSA will need to dissociate itself from the often antagonistic relationship between SRO ownership and city agencies that enforce regulations. To do this SF-HSA must first improve its understanding of this tension, which could take the form of another survey of owners.
5. *What owners want from SF-HSA*
To best create incentives for owners to partner, there will need to be efforts to determine what owners want from SF-HSA like filling vacancies or conducting repairs. This might take the form of more qualitative research with owners, such as interviews.

Appendix A: Survey for Residential Hotel Owners

Hotel Address: Number and Street, San Francisco, CA

Below is a short list of questions designed to help us learn about the needs of your hotel's residents and the possibilities for cooperation between your hotel and the San Francisco Human Services Agency. If you do not feel that you are sufficiently familiar with your residents to answer some of the questions, then you might consult a member of your staff for assistance in filling out the survey. If you have questions, concerns or comments, please contact survey administrators William Leiter at (415) 557-6017 or Michael Shen at (415) 557-5511.

1. Do you have many of the following types of residents? Check all that apply.

- Single adults
- Seniors
- Physically disabled
- Families with children
- People with mental health needs
- Don't know

2. Does your hotel have unwanted vacancies?

- Yes
- No

3. On average, what percent of rooms in your hotel are vacant?

- 0 – 10%
- 10 – 20%
- 20 – 30%
- 30 – 40%
- 40 – 50%
- Over 50%

4. What factors contribute to the vacancy rate in your hotel? (Check all that apply)

- Frequent turnover of residents
- Prefer to maintain lower resident population
- Insufficient demand for units
- Unable to make necessary repairs to units
- Other (please specify) _____

5. What is the average length of stay in your hotel?

6. Would residents of your hotel benefit from any of the following? Check all that apply.

- Medical care
- Counseling
- Childcare
- Transportation
- In-home assistance with things like eating, bathing, and household chores

- Job training and placement
- English classes
- Help with food
- Social activities and recreation
- Other (please specify) _____
- Don't know

7. Would you be interested in helping residents of your hotel connect to social services in any of the following ways? Check all that apply.

- Receive information about social services
- Receive free training for you and your staff on how to connect residents to social services
- Have social service providers visit your hotel
- Other (please specify) _____

8. If you checked any of the options in question seven, whom may SF-HSA contact for further discussion?

- Name _____
- Position _____
- Address _____
- Phone _____
- E-mail _____

9. Name of person who completed this survey, if different from above.

10. Is there anything else important for us to know?

Appendix B: Cover Letter

Date

Hotel Owner Name
Owner Address.

Dear Owner,

My name is William Leiter. I am writing on behalf of myself and my colleague, Michael Shen, to ask that you please fill out a short survey about your hotel at Number and Street. If you have already received this survey and responded, please ignore this letter. If you are not the owner but the property manager, you may also feel free to complete the survey. Finally, if your property is an apartment building with some SRO (single-room-occupancy) hotel units, please respond to the questions with respect to these units only.

Michael and I are students at UC Berkeley and Harvard, respectively, and this summer we are working with the Human Services Agency (HSA) of the city and county of San Francisco. HSA is the central resource for public assistance in the city. Its mission is to promote well-being and self-sufficiency among individuals, families and communities. Michael and I are working with HSA to help the agency better serve the needs of residents of hotels in San Francisco.

Hotels account for a substantial portion of San Francisco's affordable housing stock, providing homes for almost 20,000 people. Many vulnerable populations, such as families with children, seniors and adults with disabilities, and other public service recipients live in hotels. As a result, we wish to learn more about the needs of your residents and the prospects for cooperation between your hotel and social service agencies.

We hope to develop our understanding of these topics through the enclosed survey. The results will help HSA determine how best to work with hotels to ensure that residents receive the best services possible. The survey is very short and your participation will be extremely helpful.

We have also included a guide to San Francisco's social services for your and your residents' reference. Please feel free to contact us if you have any questions, concerns or comments. We appreciate your time and cooperation.

Thank you,

William Leiter and Michael Shen



William Leiter
(415) 557-6017
William.Leiter@sfgov.org

Michael Shen
(415) 557-5511
Michael.Shen@sfgov.org

Appendix C: Guide to San Francisco’s Social Services

The Human Services Agency is a department of the City and County of San Francisco and the central resource for public assistance in the city. Our mission is to promote well-being and self-sufficiency among individuals, families and communities in San Francisco. SF-HSA has approximately 1,800 employees and maintains contracts with many community-based nonprofit agencies to provide crucial services to San Franciscans in need.

We provide a safety net for individuals and families by offering income support, community-based living supports, and assistance getting food, housing, and health coverage. We offer programs and services that ensure the protection and safety of children, the elderly, and dependent adults. SF-HSA help people secure employment through training, job search and child care assistance.

Below is a list of programs and contact information. If you have questions or need assistance finding a program please contact either the Department of Human Services at (415) 557-5000 or the Department of Aging and Adult Services at (415) 355-3555.

Emergency Numbers

Report Elder Abuse: (800) 814-0009

Report Child Abuse: (800) 856-5553

Fraud Hot Line: (415) 557-5771

Children and Families

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Child Protective Services	Responds to concerns of child abuse or neglect.	(800) 856-5553
SF TALK	Counseling for children and families needing help.	(415) 441-5437
Children with Disabilities	Support for families with children with special health needs and disabilities.	(415) 282-7494
Children’s Council	Assists eligible families with child care.	(415) 276-2900

Seniors and Adults with Disabilities

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Adult Protective Services	Investigates possible abuse or neglect of elders.	(800) 814-0009
Information, Referral and Assistance	24-hour services for older adults.	(800) 510-2020
Office of the Aging	Provides services including nutrition, transportation, and bilingual needs.	(415) 355-3555
In-Home Supportive Services	Helps low-income elderly people live safely in their homes by providing home-based services.	(415) 557-5251
Central City Resource Center for Seniors	Provides information, referrals, and assistance to seniors.	(415) 931-6000
County Veterans Service Office	Assists veterans and their dependants to obtain benefits and entitlements.	(800) 807-5799 or (415) 554-7100

Jobs and Employment

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Employment Information Center	Provides information about employment services and access to job listings, counseling, and computers.	(415) 557-5636
One Stop Center – Civic Center	Provides information about all publicly funded employment and training services.	(415) 749-7577
Workforce Development Center	Offers structured and intensive job readiness appraisal and job search workshops.	(415) 558-5292
First Source Hiring	Matches employers with job seekers.	(415) 401-4960
Vocational ESL Immersion Program	One to three years program to provide non-English speakers with a foundation in English.	(415) 558-1370
Workforce Solutions	Provides job seekers access to employers.	(415) 401-4949

Financial Assistance

<i>Program</i>	<i>Description</i>	<i>Contact</i>
CalWORKS	Provides financial support for 60 months to adults with dependent children.	(415) 557-5723
County Adult Assistance Programs	Serves very low-income adults without dependents. Contact this office for information on Personal Assisted Employment Services (PAES,) Supplemental Security Income Pending (SSIP,) Cash Assistance Linked to Medi-Cal (CALM,) and General Assistance (GA.)	(415) 558-1000
Cash Assistance Program for Immigrants	Pays cash benefits to lawful non-citizens who do not qualify for Supplemental Security Income (SSI.)	(415) 558-1978

Housing and Homelessness

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Eviction Prevention	Helps low-income individuals and families maintain their housing.	(415) 558-2255
Family Eviction Prevention Program	Provides eviction prevention services to low-income families.	(415) 972-1300
Connecting Point for Families	Centralized intake system for homeless families seeking emergency shelter.	(888) 811-7233
Tenderloin Health Center	Takes reservations for shelters and provides medical, social, and substance abuse services.	(415) 431-7476
Supportive Housing Programs	These programs aim to place individuals in permanent supportive housing.	(415) 558-1902

Health and Nutrition

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Food Stamps	Helps children and low-income households access a nutritious diet.	(415) 558-1001
Medi-Cal Health Connections	Provides free and low-cost health care to eligible San Franciscans.	(415) 863-9892

A Survey of Desk Clerks in Private Tenderloin SROs

A Report for the San Francisco Human Services Agency
San Francisco, CA

By William Leiter and Michael Shen

Summer 2009

Table of Contents

Executive Summary.....	2
Section I. Introduction.....	3
Section II. Findings.....	6
Section III. Recommendations.....	11

Executive Summary

This report provides a description of privately-run Single-Room Occupancy hotels (SROs) in the Tenderloin neighborhood of San Francisco. The study had two purposes. The first was to expand SF-HSA's understanding of these SROs by learning about their residents, physical environment, and operations. The second was to gauge the interest of SRO staff in collaborating with SF-HSA to better meet the social service needs of residents. Such collaboration represents a potential tool to improve the lives of the estimated 7,731 SRO residents in the Tenderloin.¹

Over five non-consecutive days in July, 2009, we visited the addresses of 53 SROs and administered a survey to desk clerks and managers. We also recorded observations about foot traffic and the physical environment of the SROs.

Of the 53 addresses, our study focuses on 30 that we defined as "typical" privately-run SROs. These hotels cater to low-income residents, are for-profit, and have on-site staff that consider the building an SRO. We found that these hotels commonly have locked front gates, long flights of stairs up to the rooms, and no functioning elevator. Desk clerks expressed moderate to low interest in collaboration with SF-HSA, but many SROs already have some relationship with city programs or community based organizations (CBOs).

To continue research and outreach to private SROs, we recommend SF-HSA do the following:

1. Refine SRO data, aggregate information that is currently spread across numerous departments and organizations, and reach out to city programs and CBOs that have relationships with SROs.
2. Consider different definitions for "SRO." The Planning Department's SRO classification system may not be optimal for SF-HSA's purposes. SF-HSA should use the Planning Department's data on the number and types of units in each property and consider adopting a definition that excludes those with a small percentage of SRO units.
3. Continue outreach to SROs that reported interest in receiving more information about SF-HSA services and potential training for desk clerks. Future outreach efforts should also gauge the interest of private SROs in working more closely with SF-HSA to fill room vacancies.
4. Determine which SROs have working elevators so SF-HSA can ensure IHSS clients are living in buildings with working elevators.

¹ Fribourg, Aimee. *San Francisco's Single-Room Occupancy (SRO) Hotels*. San Francisco Human Services Agency, Spring 2009. 21.

Section I. Introduction

A. Purpose

This study had two main objectives. The first was to expand SF-HSA's understanding of privately-run SROs in the Tenderloin by acquiring information about their residents, physical environment, and operations. The second was to gauge the interest of staff at privately-run SROs in collaborating with SF-HSA to better meet the social service needs of residents.

B. Context

The demand for affordable housing in San Francisco far exceeds the supply. Vulnerable populations such as families with children, seniors, adults with disabilities, and other public service recipients are often at risk for homelessness. SROs account for a substantial portion of San Francisco's affordable housing stock, providing more housing for low-income people than all the city's public housing developments combined.²

The Department of Planning defines an SRO as any unit "consisting of no more than one occupied room with a maximum gross floor area of 350 square feet. ... The unit may have a bathroom in addition to the occupied room."³ A typical SRO unit does not have a kitchen and seldom has a private bathroom. The Planning Department considers any building with one or more SRO units to be an SRO building.⁴ Though some SROs are apartment buildings, many house a mix of long-term residents, short-term residents, and tourists.

Most of San Francisco's SROs were built in the early decades of the 20th century, have less than 40 units, and average rents from \$500 to \$600. According to the Planning Department, there are 530 SROs in San Francisco and 208 in the Tenderloin neighborhood, which is the focus of this study.⁵ Of the hotels in the Tenderloin, the city works closely with 28 through SF-HSA's Single Adult Supportive Housing program (SASH) or the Department of Public Health's Direct Access to Housing program (DAH); an additional 16 are owned by non-profits. The remaining 164 SROs in the Tenderloin are privately-owned.

A 2009 SF-HSA report concluded that privately-owned SROs "represent opportunities for mutually beneficial partnerships between service providers and hotel owners." However, SF-HSA has far less information about the residents, physical environment, and operations of privately-owned SROs compared to those affiliated with SASH, DAH, and non-profits. Because so many current and potential SF-HSA clients live in privately-run SROs, it is in SF-HSA's interest to learn more about them, and possibly to pursue partnerships.

C. Methodology

We administered the survey in person to the desk clerks or managers of SROs over five non-consecutive days in July, 2009. SF-HSA Director of Planning Dan Kelly accompanied us on two

² This background description of San Francisco's SROs is drawn directly from another 2009 SF-HSA report: Fribourg, Aimee. *San Francisco's Single-Room Occupancy (SRO) Hotels*. San Francisco Human Services Agency, Spring 2009. 3.

³ Department of Planning Code Sec. 890.88.

⁴ Ibid.

⁵ Fribourg, Aimee. 3.

of the days. We focused our study on the Tenderloin because of its high concentration of SROs. Also, many Tenderloin SROs employ desk staff, as opposed to Chinatown SROs, which typically do not.⁶ Using addresses from the Planning Department, we created a map of privately-owned Tenderloin SROs (included as **Figure 1.**) On each day of surveying, we grouped hotels by location to create convenient walking routes for the visits. We focused on areas likely to have low-income residents.

Figure 1: Private Tenderloin SROs



We developed a survey instrument to acquire information from SRO staff (included as **Appendix A.**) In addition to the topics described in the purpose, the survey contained secondary questions to be asked if the interviewee seemed willing. These questions included how long the interviewee had worked in the SRO, the average length of residents’ stay, and substance abuse and mental health issues among residents. Upon entering the SRO, we introduced ourselves to the staff as student interns working for SF-HSA for the summer. To engage in more natural conversation, we often deviated from the survey, asking questions out of order or skipping some if the interviewee seemed unresponsive. We also recorded observations about foot traffic and the physical environment of the SRO, such as whether one needed to be buzzed in by a clerk to enter, or whether there was a working elevator. At the conclusion of each interview, we left business cards and a “Guide to San Francisco’s Social Services” listing phone numbers of SF-HSA services (included as **Appendix B.**)

⁶ Fribourg, Aimee. 25.

The questions we asked and the types of observations we recorded changed as our understanding of SROs evolved. As a result, many of our findings include the qualifying phrase “at least.” For example, we did not always take note of whether the desk clerk lived in the hotel and thus only have that information for 15 of the hotels. As a result, we claim that “at least” 13 desk clerks live in their hotels because clerks at other properties where we did not record this may have also lived in their hotels, meaning the number might be larger than 13.

Section II. Findings

A. Number and Types of SROs

We visited 53 addresses in the Tenderloin from the Planning Department’s list of SROs. This list did not accurately report the status of three buildings that are closed or do not exist. *Thirty of the addresses were “typical” privately-run SROs, meaning they met our expectation of a Tenderloin SRO in having the following characteristics:*

- On-site staff or a buzzer indicating on-site staff.
- Appear to cater to low-income residents.
- Staff considers the building to be an “SRO” or “residential hotel.”
- For-profit.

The remaining 20 addresses did not have at least one of the above characteristics and differed from the profile in the following ways:

- Four did not seem to have on-site staff.
- Seven are large apartment buildings that seem to cater to well-off residents.⁷
- Four cater to tourists.
- Two cater to students.
- Two are managed by non-profits.
- One serves as transitional housing for released prisoners.

We did not acquire additional information for buildings that were closed or for buildings without on-site staff because there was no way for us to enter.

Figure 2: Characteristics of the addresses we visited

Type of Building	Number of buildings	On-site staff	Cater to low-income residents	Staff consider it an SRO	For-profit
Typical privately-run SRO	30	Yes	Yes	Yes	Yes
SRO without staff	4	No	Yes	NA	Yes
Large apartment building	7	Some (2)	No	No or NA	Yes
Tourist hotel	4	Yes	No	No	Yes
Student housing	2	Yes	No	No	Yes
Non-profit SRO	2	Yes	Yes	Yes	No
Transitional housing	1	Yes	Yes	No	Yes
Closed or did not exist	3	NA	NA	NA	NA
TOTAL	53	41	37	32	48

B. Description of a “Typical” SRO

A typical SRO has a front gate which a staff member must buzz to unlock. Residents do not appear to possess keys to these gates and must also be buzzed in; during interviews staff often

⁷ According to the Planning Department, these buildings range from 4 to 10 stories and contain 44 to 111 units.

had to pause to admit residents to the hotel. This seems a likely source of conflict between residents and clerks.

After entering the hotel there is, most often, a long flight of stairs up to the manager's office and the rooms. There is not typically a lobby. We could not determine if there was an elevator in 15 of the 30 typical SROs we visited, most often because the clerk's office was near the front of the hotel and we could not see the entire floor. Of the remaining 15, only four had working elevators. *This lack of working elevators may pose an accessibility problem for residents and contribute to isolation. Of the 15 clerks we asked about residents, 13 reported that seniors or disabled persons lived in the building and at least 6 of those buildings lacked working elevators.*

A slight minority of the clerks in typical SROs reported disturbances in the hotel. Of the 13 we asked, five reported frequent disturbances due to drugs, alcohol, or residents with emotional or psychological problems. One desk clerk described his SRO as a "mental hospital." Another said the job was often dangerous, particularly on the first and fifteenth of each month, when residents receive financial assistance checks from the city. SRO staff seem to anticipate disturbances on these days; we often observed signs stating a hotel does not permit visitors on the 1st or the 15th day of the month.⁸

C. Experience of an SRO Desk Clerk

Because desk clerks have daily contact with SRO residents, they are a potentially valuable source of information for SF-HSA. Furthermore, the SF-HSA Planning Unit has considered the possibility of providing training to interested desk clerks to better connect SRO residents to social services. In the following section, we present our observations about the desk clerks we met.

Desk clerks were present at 27 of the 30 typical SROs we visited.⁹ Judging by their appearance or accent, or by information they supplied, at least 21 of these clerks are ethnically South Asian. We mention this trend because it appears to be strong and cultural sensitivity may play a role in future outreach efforts.

Of the 14 clerks we asked about hotel ownership, four reported being the owners, suggesting most clerks are simply on-site staff or lease the building from an off-site owner. From this limited sample size we could not find any significant differences between SROs where the clerk was the owner and SROs where he or she was not.

We conducted a number of surveys in the clerks' private quarters, which often adjoined the hotel office. *Of the 15 clerks we asked, 13 said they live in the SRO.* Ten reported their spouses or children also lived there, and five of these said that they or a family member were on-site and ostensibly on-duty 24 hours a day.

⁸ This is in accordance with Sec. 2.B of the San Francisco Rent Board's Uniform Hotel Visitor Policy, which permits hotels to restrict visitation on two out of three check days each month as long as they post a sign notifying residents of the blackout dates.

⁹ The remaining three had buzzers indicating the presence of staff, but nobody answered the buzzers when we rang.

Figure 3: Ownership and residence information about desk clerks in typical SROs

Topic	Number of SROs where this topic was recorded	Number of SROs where it is true	Percentage where it is true
Desk clerk present at time of visit	30	27	90.0
Desk clerk is the owner	14	4	28.6
Desk clerk lives in the hotel	15	13	86.7
Desk clerk's family lives in the hotel	14	10	71.4

Because we judged it a sensitive topic, we did not ask clerks about their salaries until the last series of visits. When asked, several clerks explained they did not earn specific wages because the SRO was operated by their family. However, one clerk told us that for managing the hotel, he and his wife together received \$1200 a month and free lodging in the hotel for themselves and their daughter.

Despite modest compensation, clerks tend to stay in their jobs. *We asked 15 clerks about their tenure and found a median duration of three years on the job.* However, we found wide variance in these answers, which ranged from six weeks to 32 years.

The combination of long hours, repetitive tasks, and disturbances means SROs are unlikely to offer ideal working conditions. One clerk told us his job could be dangerous and that he occasionally had altercations with residents. Another, who had worked in SROs for 15 years, complained of extreme tedium. Many clerks seemed to enjoy talking to us, perhaps as a break from their daily routines.

However, not all clerks expressed complaints. One clerk, who was also the owner, said she avoided problems by refusing to accept “rough tenants.” She reported having a 60% occupancy rate. Two clerks expressed pride in their familiarity with residents and their needs. One of these recalled taking a long-term resident, a Vietnam veteran, to the hospital when he was sick. She said she offered him counseling and support, and that she treated him as a member of her own family. Overall, however, the latter two cases appear to be exceptional.

D. Collaboration between SF-HSA and Privately-Run SROs

Clerks expressed moderate to low interest in helping residents meet their social services needs. *We asked 20 clerks about their interest in receiving training to learn how to better connect residents to social services and seven expressed interest.* We asked 11 clerks whether on the job training was sufficient to be a desk clerk; eight said that it was. Four clerks explicitly stated that residents’ needs lie outside their responsibility.

In contrast, four other clerks indicated they felt it was part of their jobs to help residents meet their needs. Of these four, two worked in SROs that have uncharacteristically pleasant lobbies and waiting lists for a room, suggesting they are especially desirable.

Figure 4: Interest in training and status of partnerships at typical SROs

Topic	Number of SROs at which this was asked	Number of SROs that responded affirmatively	Percentage that responded affirmatively
Interest in receiving training	20	7	35.0
On the job training is sufficient	11	8	72.7
Contact with city services or a CBO	17	14	82.4

Despite clerks' modest interest in receiving training, many of the 30 typical SROs already have some form of contact with the city or with community based organizations (CBOs). We asked about such partnerships at 17 SROs. *Fourteen clerks reported having contact with CBOs, caseworkers, or other advocates for residents.*

Clerks most frequently reported interaction with the Homeless Outreach Team (HOT) and representative payee services. Clerks also reported keeping business cards for some residents' case workers or advocates, and said they would call them in the event of a problem. Some entities, such as the Homeless Outreach Team and Conard House, place clients in the SROs as residents. **Figure 5** contains the full list of city services and CBOs mentioned by clerks.

As an underlying research question, we also considered whether privately-run SROs are an overlooked source of affordable housing stock for subsidized housing programs. A 2009 SF-HSA report found that Tenderloin SROs have an average vacancy rate of 30%.¹⁰ This high vacancy rate suggests a potential for partnership between the city and privately-owned SROs that would subsidize or pay for a room at an SRO for low-income persons who cannot find housing.

We asked eight clerks in typical SROs about vacancy rates and found the median to be 9%, with answers ranging from 0% to 55%. If these answers are accurate, they suggest the vacancy rate in privately-owned Tenderloin SROs may be lower than initially thought. However, five hotels did report having open rooms, indicating some potential for partnership between the city and privately-run SROs.

Possibly complicating such a partnership, one SRO owner reported that the city's Care Not Cash program has negatively affected her business. Care Not Cash screens clients and keeps waiting lists because its hotels are considered more desirable than many private SROs. The owner asserted that Care Not Cash has taken the best residents away from privately-run SROs. Her hotel, as a result, has had difficulty finding non-disruptive residents and has a 25% vacancy rate.

¹⁰ Fribourg, Aimee. 21.

Figure 5: Programs and CBOs mentioned by SRO clerks

Organization or Program	Description of the partnership	Number of SROs reporting
Bay Area Rescue Mission	Operates emergency shelters, recovery programs, transitional services, food pantries, and youth intervention. The Mission in the Tenderloin is next to an SRO and the Mission staff know the hotel clerks.	1
City case workers	SRO desk clerks had case workers' cards and told SF-HSA they would contact them in event of an emergency	3
Conard House	Provides community-based resources for vulnerable adults with serious mental illness. One clerk reported that Conard House places clients in her SRO.	1
Homeless Outreach Team (HOT)	HOT has 46 staffers and has provided permanent placements, including in SROs, for 508 formerly homeless persons in San Francisco. Six desk clerks reported HOT currently places or has formerly placed residents in their SRO.	6
IHSS	Provides in-home support to elderly or disabled adults. The clerk at one SRO reported knowing IHSS providers and calling them when clients needed assistance.	1
Larkin Street Youth	Provides numerous services to youth. One desk clerk reported that Larkin rents 7 or 8 rooms for clients in his SRO and pays the hotel directly.	1
Lutheran Social Services	Sends case workers to at least one SRO. The desk clerk reported knowing the workers and their contact information.	1
Project Open Hand	Provides meals to seniors and people living with serious illness. One clerk reported that Open Hand workers come to the hotel to deliver meals.	1
Proposition 36 transitional housing	Two clerks stated that the city places residents in their SRO through Proposition 36, the Substance Abuse and Crime Prevention Act of 2000, which, among other services, provides transitional housing.	2
Representative Payee Programs	Four SROs reported receiving rent checks for residents that cannot handle their own finances from representative payees, who typically work for the Public Guardian or CBOs.	4
Tenderloin Housing Clinic (THC)	Provides case workers that visit clients in an SRO and pay their rent. The THC office is across the street from this SRO.	1
Westside Community Services	Provides an array of community-based prevention, mental health, substance abuse, and social services. One clerk reported that many of the residents in his hotel have caseworkers from Westside, who also serve as representative payees, and that he is in touch with them.	1
Walden House	Provides substance abuse treatment and representative payee services. One clerk reported that most of his residents have caseworkers from Walden and that he is in touch with them.	1

Section III. Recommendations

A. Refine and Aggregate SRO data

To further study potential collaboration, SF-HSA will need to refine its data and information regarding SROs. This study used the Planning Department’s data to select 53 privately-owned Tenderloin SROs, and of those listings, five were closed, did not exist, or had inaccurate addresses. This represents a 9% error rate. Given the dearth of affordable housing in San Francisco, it is important to track SRO closures and conversions of SROs to alternative uses such as student housing and tourist hotels. We will communicate the errors we found to the Planning Department to update its records.

Furthermore, to create a more complete database about SROs, the City should aggregate information currently spread across numerous departments and organizations. The SF-HSA Planning Unit is creating a database that incorporates findings from this study along with other publicly available information from city and county agencies. *Similarly, SF-HSA should reach out to city programs and CBOs that have relationships with SROs.* City programs such as HOT, the Public Guardian’s Representative Payee program, and the Proposition 36 transitional housing program work with SRO residents and managers and are likely to have useful information. Community based organizations such as the Tenderloin Housing Clinic, Westside Community Services, Meals on Wheels, and the Bay Area Rescue Mission work with SRO residents and managers as well. (For a full list of city programs and CBOs mentioned by desk clerks we interviewed, see **Figure 6.**) SF-HSA ought to reach out to these programs and organizations to learn more about the needs of SRO residents and the environment and operation of SROs.

SF-HSA can combine all of this information to create a unified data set for all SRO related projects. This will help SF-HSA to guide and plan further outreach to SROs and to better track the supply of affordable housing stock in San Francisco.

B. Consider different definitions for “SRO”

SF-HSA should reconsider its use of the Planning Department’s SRO classification system. Of the 53 hotels this study located through the Planning Department’s data, 16 were large apartment buildings, student housing, tourist hotels, non-profits, or transitional housing. The Planning Department considers these buildings SROs because it classifies buildings that have “one or more SRO units” as SROs.¹¹ The Planning Department’s inclusion of these buildings is thus intentional, and limits the usefulness of the database for SF-HSA’s purposes.

Properties that contain primarily non-SRO units are poor candidates for SF-HSA’s outreach efforts. The staff and ownership of these properties do not consider them to be SROs and, based on our experience, are likely to be confused by, or unreceptive to, SF-HSA outreach. Moreover, properties with a low percentage of SRO units will have fewer residents with social service needs than properties that primarily contain SRO units. To target its efforts more efficiently, SF-HSA ought to create an alternative classification system that excludes these properties.

¹¹ San Francisco Planning Code Sec. 890.88.

The information needed to create such a system is already available. *The Planning Department has complete data on the number of SRO units, tourist units, and non-SRO residential units for roughly 75% of the 530 buildings it classifies as SROs, and has at least partial information for all of the buildings.* SF-HSA should take this information and exclude from the list all buildings with less than a certain minimum percentage of SRO units. As a starting point, we recommend a minimum percentage of about 43.2%. We chose this number because we found that staff at properties with 43.2% SRO units or lower did not consider the property to be an SRO.¹²

In addition, SF-HSA should distinguish between SROs that have desk clerks and those that do not. In this study we did not classify four properties that appeared to be SROs, but did not have desk clerks, as “typical SROs.” We excluded these properties because we could not enter them or speak to any staff. However, these four properties otherwise appeared to be privately-owned SROs and the residents may still benefit from SF-HSA outreach. More importantly, there are likely many more hotels that fit this profile in Chinatown, where desk clerks are less common. Important differences likely exist between the business models of SROs with staff and those without staff, necessitating that SF-HSA distinguish between them to implement different outreach strategies.

C. Continue outreach

We found that there is room for collaboration between SF-HSA and privately-run SROs. Of the 20 clerks we asked, seven expressed interest in either receiving training or more information about social services. We will supply contact information for these clerks to the SF-HSA Planning Unit for follow-up, and we recommend further visits to SROs to find other clerks who may be interested.

As more information becomes available about the interest of desk clerks and the needs of residents, *SF-HSA may wish to develop an informational packet to distribute to SROs.* Following our interviews, we left behind flyers with phone numbers for city services and programs, but more detailed information would be helpful. This information could include basic eligibility guidelines for key programs and services or detail how SRO staff should handle emergency situations.

SF-HSA should also consider sending social service providers to offer information and answer questions at SROs. A related survey of SRO owners found that 19 of the 82 hotels that responded to the survey, or 23.2%, were interested in having social service providers visit their hotel. Providers could set up a table in the lobby, if there is one, or near the clerk’s office and provide information to residents, answer residents’ questions, or leave packets of information regarding social services and eligibility guidelines.

In addition, SF-HSA should continue to explore the possibility of offering training to desk clerks to help them connect residents with social services. Three of the seven clerks who expressed interest in training also said that their on-the-job training was insufficient. Anecdotally, a handful of clerks seemed interested in training as something to put on their résumé. Such training could

¹² According to Planning Department records, the percentage of total units that are SRO units in the seven apartment buildings we visited range from 8.9% to 43.2%. To err on the side of being inclusive, we chose 43.2% as our minimum ratio of SRO Units:Total Units to qualify as an SRO.

be modeled on the Community Housing Partnership's training program for desk clerks at non-profit SROs, which covers topics such as "customer service, safety, emergency procedures, de-escalating conflicts, and setting boundaries."¹³

To offer an incentive to participate, SF-HSA should consider paying desk clerks to attend the training, or paying the SRO to hire a temporary desk clerk while their usual clerk is at the training. SF-HSA might also consider requiring SROs to place their clerks in training to be eligible for city programs and initiatives that place residents in SROs, such as the HOT.

Finally, future outreach efforts should gauge the interest of private SROs in working more closely with SF-HSA to fill vacancies. Of the eight clerks we asked, five reported vacancies in the buildings. Given the high number of homeless persons in San Francisco, SF-HSA should consider partnering with private SROs that would like help filling their vacancies. SROs that, in the future, receive information or place staff in SF-HSA desk clerk training represent promising candidates for such partnerships.

D. Determine which SROs have working elevators

Of the 15 SROs where we were able to check for elevators, only four, or 26.7% had working elevators. We also found that seniors or disabled persons are living in at least 6 of the eleven hotels without a working elevator, suggesting mobility difficulties that might lead to isolation or safety problems for residents.

SF-HSA should reach out to the Division of Occupational Safety and Health (DOSH) at the California Department of Industrial Relations to determine which SROs have working elevators. The San Francisco Office of the Elevator, Ride, and Tramway unit should be able to provide this information. HSA can use this information and check it against address information for IHSS clients to ensure that clients with mobility issues are living in buildings with working elevators. In addition, this will permit HSA to advise IHSS clients and other persons with mobility issues that are looking for an SRO on which properties have elevators. This will not require a large time or resource commitment on SF-HSA's part and is likely to yield very practical benefits for a number of clients.

¹³ "Desk Clerk Training Program Course Syllabus." Community Housing Partnership.

Appendix A: Survey Instrument

Tenderloin SRO Desk Clerk Survey
Summer 2009

HOTEL ADDRESS:

HOTEL NAME:

HOTEL ID:

NAME OF RESPONDENT:

DATE:

First-tier questions

- 1) Who lives here? Do they tend to be old or young? Is it mostly single adults or families?

- 2) What kinds of special needs do your residents have, such as for food or health assistance?
 - Medical care
 - Counseling
 - Childcare
 - Transportation
 - In-home assistance with things like eating, bathing, and household chores
 - Job training and placement
 - English classes
 - Help with food
 - Social activities and recreation
 - Other (please specify) _____

- 3) Was any training available to help you do your job? What type of training would be helpful for a desk clerk?

- 4) If you wanted to connect a resident with social services, would you know whom to call?

- 5) Would you be interested in learning more about the city's social services, and possibly being trained on how to connect your residents to services?

- 6) Do you have any existing relationships with workers from HSA or non-profit service providers?

- 7) Do you have any sense of how many residents are homeless when they come in here?

Second-tier questions

- 1) How long have you worked here?
- 2) How many staff do you have here? Is a desk clerk present 24 hours a day?
- 3) Do you have many residents with substance abuse issues?
- 4) How long do residents typically stay?
- 5) Are you aware of mental health needs among residents? / Do residents ever cause commotion or problems in the hotel? If so, do you have any sense of what causes this?"

Additional Observations

Appendix B: Guide to San Francisco’s Social Services

The Human Services Agency is a department of the City and County of San Francisco and the central resource for public assistance in the city. Our mission is to promote well-being and self-sufficiency among individuals, families and communities in San Francisco. SF-HSA has approximately 1,800 employees and maintains contracts with many community-based nonprofit agencies to provide crucial services to San Franciscans in need.

We provide a safety net for individuals and families by offering income support, community-based living supports, and assistance getting food, housing, and health coverage. We offer programs and services that ensure the protection and safety of children, the elderly, and dependent adults. We help people secure employment through training, job search and child care assistance.

Below is a list of programs and contact information. If you have questions or need assistance finding a program please contact either the Department of Human Services at (415) 557-5000 or the Department of Aging and Adult Services at (415) 355-3555.

Emergency Numbers

Report Elder Abuse: (800) 814-0009

Report Child Abuse: (800) 856-5553

Fraud Hot Line: (415) 557-5771

Children and Families

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Child Protective Services	Responds to concerns of child abuse or neglect.	(800) 856-5553
SF TALK	Counseling for children and families needing help.	(415) 441-5437
Children with Disabilities	Support for families with children with special health needs and disabilities.	(415) 282-7494
Children’s Council	Assists eligible families with child care.	(415) 276-2900

Seniors and Adults with Disabilities

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Adult Protective Services	Investigates possible abuse or neglect of elders.	(800) 814-0009
Information, Referral and Assistance	24-hour services for older adults.	(800) 510-2020
Office of the Aging	Provides services including nutrition, transportation, and bilingual needs.	(415) 355-3555
In-Home Supportive Services	Helps low-income elderly people live safely in their homes by providing home-based services.	(415) 557-5251
Central City Resource Center for Seniors	Provides information, referrals, and assistance to seniors.	(415) 931-6000
County Veterans Service Office	Assists veterans and their dependants to obtain benefits and entitlements.	(800) 807-5799 or (415) 554-7100

Jobs and Employment

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Employment Information Center	Provides information about employment services and access to job listings, counseling, and computers.	(415) 557-5636
One Stop Center – Civic Center	Provides information about all publicly funded employment and training services.	(415) 749-7577
Workforce Development Center	Offers structured and intensive job readiness appraisal and job search workshops.	(415) 558-5292
First Source Hiring	Matches employers with job seekers.	(415) 401-4960
Vocational ESL Immersion Program	One to three years program to provide non-English speakers with a foundation in English.	(415) 558-1370
Workforce Solutions	Provides job seekers access to employers.	(415) 401-4949

Financial Assistance

<i>Program</i>	<i>Description</i>	<i>Contact</i>
CalWORKS	Provides financial support for 60 months to adults with dependent children.	(415) 557-5723
County Adult Assistance Programs	Serves very low-income adults without dependents. Contact this office for information on Personal Assisted Employment Services (PAES,) Supplemental Security Income Pending (SSIP,) Cash Assistance Linked to Medi-Cal (CALM,) and General Assistance (GA.)	(415) 558-1000
Cash Assistance Program for Immigrants	Pays cash benefits to lawful non-citizens who do not qualify for Supplemental Security Income (SSI.)	(415) 558-1978

Housing and Homelessness

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Eviction Prevention	Helps low-income individuals and families maintain their housing.	(415) 558-2255
Family Eviction Prevention Program	Provides eviction prevention services to low-income families.	(415) 972-1300
Connecting Point for Families	Centralized intake system for homeless families seeking emergency shelter.	(888) 811-7233
Tenderloin Health Center	Takes reservations for shelters and provides medical, social, and substance abuse services.	(415) 431-7476
Supportive Housing Programs	These programs aim to place individuals in permanent supportive housing.	(415) 558-1902

Health and Nutrition

<i>Program</i>	<i>Description</i>	<i>Contact</i>
Food Stamps	Helps children and low-income households access a nutritious diet.	(415) 558-1001
Medi-Cal Health Connections	Provides free and low-cost health care to eligible San Franciscans.	(415) 863-9892

EXHIBIT 3

1 DENNIS J. HERRERA, State Bar #139669
City Attorney
2 DANNY CHOU, State Bar #180240
Chief of Complex and Special Litigation
3 SHERRI SOKELAND KAISER, State Bar #197986
TARA M. STEELEY, State Bar #231775
4 Deputy City Attorneys
City Hall, Room 234
5 1 Dr. Carlton B. Goodlett Place
San Francisco, California 94102-4682
6 Telephone: (415) 554-4691
Facsimile: (415) 554-4747
7 E-Mail: sherri.kaiser@sfgov.org

8 Attorneys for Plaintiff
CITY AND COUNTY OF SAN FRANCISCO

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 CITY AND COUNTY OF SAN
13 FRANCISCO, CENTRAL CITY SRO
COLLABORATIVE, SAN FRANCISCO
14 TENANTS UNION, and HOUSING RIGHTS
COMMITTEE OF SAN FRANCISCO

15 Plaintiffs,

16 vs.

17 UNITED STATES POSTAL SERVICE,

18 Defendant.

Case No. C09-1964 RS

**PLAINTIFF CITY AND COUNTY OF SAN
FRANCISCO'S RESPONSES TO DEFENDANT
UNITED STATES POSTAL SERVICE'S FIRST
SET OF INTERROGATORIES**

23 PROPOUNDING PARTY: UNITED STATES POSTAL SERVICE

24 RESPONDING PARTY: CITY AND COUNTY OF SAN FRANCISCO

25 SET NO.: ONE

1 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff City and County of San
2 Francisco ("City") hereby responds to Defendant United States Postal Service's First Set of
3 Interrogatories.

4 PRELIMINARY STATEMENT

5 Discovery in this action is still proceeding. The City has not completed its investigation of the
6 facts relating to this action, discovery, legal research, or preparation for trial. The objections and
7 responses contained herein are based on the information currently available and are made without
8 prejudice to the City's right to present subsequently discovered facts, or facts that are already known
9 but whose relevance, significance, or applicability has not yet been ascertained.

10
11 RESPONSES TO INTERROGATORIES

12 INTERROGATORY NO. 1:

13 Identify all SROs in the City and County of San Francisco by street address, zip code and name
14 of owner(s).

15 RESPONSE TO INTERROGATORY NO. 1:

16 The requested information is provided in Attachment A to these Responses.

17 INTERROGATORY NO. 2:

18 Identify all SROs in the City and County of San Francisco that receive delivery of mail by the
19 USPS by "centralized" delivery.

20 RESPONSE TO INTERROGATORY NO. 2:

21 The method of mail delivery at any given address is a matter uniquely within the knowledge of
22 Defendant United States Postal Service ("USPS" or "Postal Service"), which provides mail delivery
23 service to all San Francisco SRO residential hotels and unilaterally controls the method it uses to
24 deliver the mail at these buildings. However, to the extent that the Plaintiffs have been able to observe
25 Defendant Postal Service's practices at San Francisco SRO residential hotels, the City believes that the
26 following SROs receive centralized delivery. This list may not be exhaustive.

27 ///

28 ///

	SRO NAME	ST. NO.	STREET NAME	ZIP
1	SENECA	34	06TH ST	94103
2	DELTA	88	06TH ST	94103
	ROSE	125	06TH ST	94103
3	PONTIAC	136	06TH ST	94103
	DUDLEY APTS	172	06TH ST	94103
4	BLACKSTONE APTS	81	09TH ST	94103
		215	14TH ST	94103
5		3048	16TH ST	94103
6	BAY COMMUNITY HOUSING	3444	18TH ST	94110
		949	ASHBURY ST	94117
7		4740	BALBOA ST	94121
	SHASTA	11	BELDEN ST	94104
8		534	BROADWAY ST	94133
		615	BROADWAY ST	94133
9		660	BROADWAY ST	94133
		700	BROADWAY ST	94133
10		705	BROADWAY ST	94133
	2136 BRODERICK ST APTS	2136	BRODERICK ST	94115
11	2148 BRODERICK ST APTS	2148	BRODERICK ST	94115
	DEL MAR	625	BUSH ST	94108
12	KENILWORTH	698	BUSH ST	94108
	EHREN APTS	825	BUSH ST	94108
13		980	BUSH ST	94109
	CHISMORE APTS	999	BUSH ST	94109
14	ST STEPHENS	1105	BUSH ST	94109
	CABLE CAR COURT	1499	CALIFORNIA ST	94109
15	CALDRAKE ARMS	1541	CALIFORNIA ST	94109
16		3398	CALIFORNIA ST	94118
		182	CARL ST	94117
17		647	CLAY ST	94111
		665	CLAY ST	94111
18		761	CLAY ST	94108
		777	CLAY ST	94108
19	BOW ON BENE ASSN	808	CLAY ST	94108
	CHIN WING CHEUN BENE	815	CLAY ST	94108
20	ASSN			
	LEW GAR KONG SAW ASSN	854	CLAY ST	94108
21		870	CLAY ST	94108
	CHINESE PRESBYTERIAN	910	CLAY ST	94108
22	YMCA			
		920	CLAY ST	94108
23		937	CLAY ST	94108
	WEST	141	EDDY ST	94102
24	EMPRESS	144	EDDY ST	94102
	WILLIAM PENN	160	EDDY ST	94102
25	RITZ	216	EDDY ST	94102
	ALEXANDER RESIDENCE	230	EDDY ST	94102
26	WINDSOR	238	EDDY ST	94102
	REALITY HOUSE WEST	380	EDDY ST	94102
27	HAMLIN	385	EDDY ST	94102
	JEFFERSON	440	EDDY ST	94109

1	ELK	670	EDDY ST	94109
	PASADENA	120	ELLIS ST	94102
2	MARIA MANOR	174	ELLIS ST	94102
	CORONADO	373	ELLIS ST	94102
3		376	ELLIS ST	94102
	BENJAMIN ARMS APTS	424	ELLIS ST	94102
4	ST VINCENT DE PAUL SOC	480	ELLIS ST	94102
	SENATOR	519	ELLIS ST	94109
5	CITI PROPERTIES LLC	725	ELLIS ST	94109
		20	FRANKLIN ST	94102
6		4330	GEARY BL	94118
	GRAYSTONE	66	GEARY ST	94108
7		520	GEARY ST	94102
	CHINESE COMM HSG CORP	585	GEARY ST	94102
8		676	GEARY ST	94102
	PLAZA	765	GEARY ST	94109
9	UNION	811	GEARY ST	94109
	HARTLAND	909	GEARY ST	94109
10	925 GEARY ST APTS	925	GEARY ST	94109
	PRESIDENT	935	GEARY ST	94109
11	KOWLOON	1036	GEARY ST	94109
	GOLDEN GATE	248	GOLDEN GATE AV	94102
12	HAMPTON COURT APTS	378	GOLDEN GATE AV	94102
	CHINESE COMM HSG CORP	523	GRANT AV	94108
13	TI HANG LUNG CO INC	654	GRANT AV	94108
14	REPUBLIC	710	GRANT AV	94108
		828	GRANT AV	94108
15	CHINESE COMM HSG CORP	1527	GRANT AV	94133
		1200	HAIGHT ST	94117
16	RAMAN	1011	HOWARD ST	94103
	KEYSTONE APTS	1369	HYDE ST	94109
17		624	JACKSON ST	94133
		912	JACKSON ST	94133
18	BOYD	41	JONES ST	94102
	LYRIC	140	JONES ST	94102
19	MARLTON MANOR	240	JONES ST	94102
	ABBAY APTS	450	JONES ST	94102
20	PIERRE	540	JONES ST	94102
		720	JONES ST	94109
21	NOB HILL PLACE	1155	JONES ST	94109
22		649	KEARNY ST	94108
		712	KEARNY ST	94108
23		1005	LARKIN ST	94109
	SARATOGA	1008	LARKIN ST	94109
24	AARTI	391	LEAVENWRTH ST	94102
		711	LEAVENWRTH ST	94109
25		1751	MARKET ST	94103
	VIKING	1876	MARKET ST	94102
26		2306	MARKET ST	94114
	AMBASSADOR	55	MASON ST	94102
27	CIVIC CENTER RESIDENCE	44	MCALLISTER ST	94102
28		146	MCALLISTER ST	94102

1	JAY-MITSU-VIPIN PRTNRSH	270	MCALLISTER ST	94102
	ISABEL	1095	MISSION ST	94103
2	STAR	2176	MISSION ST	94110
	CASA AMAYAA APTS	4796	MISSION ST	94112
3	OCTAVIA HOUSE	515	OCTAVIA ST	94102
	COMMUNITY HSG PRTNSHP	835	OFARRELL ST	94109
4		644	PACIFIC AV	94133
	LINGSAI REAL & INVEST	656	PACIFIC AV	94133
5	TRAVELERS AID SOCIETY OF SF	111	PAGE ST	94102
6		1880	PAGE ST	94117
	GREAT EASTER	614	PINE ST	94108
7	GROSVENOR HOUSE	899	PINE ST	94108
	COLUMBIA APTS	743	POLK ST	94109
8	REGENCY	1214	POLK ST	94109
		1255	POLK ST	94109
9		1315	POLK ST	94109
	GAETANI REALTY, INC	1618	POLK ST	94109
10	TOM'S	1625	POLK ST	94109
		1733	POLK ST	94109
11	CLAY	1736	POLK ST	94109
	EMPEROR NORTON	615	POST ST	94109
12	SHELDON	629	POST ST	94109
	WORTH	641	POST ST	94109
13	WARRINGTON APTS	775	POST ST	94109
	XGS PROP MGRS	798	POST ST	94109
14	LOOPER RESIDENCE	875	POST ST	94109
		1005	POWELL ST	94108
15		1449	POWELL ST	94133
	SALVATION ARMY	1450	POWELL ST	94133
16		1466	POWELL ST	94133
		45	ROSS AL	94108
17	MISSION	520	SO. VAN NESS AV	94110
18	MISSION HOUSING DEV CORP	22	SOUTH PARK AV	94107
	MISSION HOUSING DEV CORP	102	SOUTH PARK AV	94107
19		106	SOUTH PARK AV	94107
		809	STOCKTON ST	94108
20		856	STOCKTON ST	94108
		1017	STOCKTON ST	94108
21	LEE SING YEE ASSN	1064	STOCKTON ST	94108
		1137	STOCKTON ST	94133
22	CASA PLAYA	1316	STOCKTON ST	94133
	STOCKTON	1350	STOCKTON ST	94133
		766	SUTTER ST	94109
24	PERSONALITY	952	SUTTER ST	94109
		1114	SUTTER ST	94109
25	DALT	34	TURK ST	94102
	CAMELOT	124	TURK ST	94102
26	ANTONIA MANOR	180	TURK ST	94102
	SALVATION ARMY	242	TURK ST	94102
27	BARCELONA	270	TURK ST	94102
		275	TURK ST	94102
28	VINCENT	459	TURK ST	94102

1	CRESENT MANOR	467	TURK ST	94102
	VANTAGGIO SUITES	835	TURK ST	94102
2	UNION	1510	UNION ST	94123
		2186	UNION ST	94123
3	ROYAN	405	VALENCIA ST	94103
	APOLLO	422	VALENCIA ST	94103
4	INVERNESS BLDG	1405	VAN NESS AV	94109
	MASARWEH	2420	VAN NESS AV	94109
5	WASHBURN HOUSING CORP	42	WASHBURN ST	94103
		858	WASHINGTON ST	94108
6		874	WASHINGTON ST	94108
		29	WAVERLY PL	94108
7		124	WAVERLY PL	94108
		24	WENTWORTH ST	94108

8
9
10 **INTERROGATORY NO. 3:**

11 Identify all SROs in the City and County of San Francisco that receive delivery of United
12 States mail by single point delivery.

13 **RESPONSE TO INTERROGATORY NO. 3:**

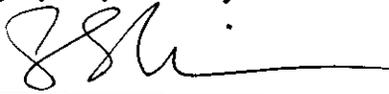
14 The method of mail delivery at any given address is a matter uniquely within the knowledge of
15 Defendant Postal Service, which provides mail delivery service to all San Francisco SRO residential
16 hotels and unilaterally controls the method of delivery it uses at those buildings. However, to the
17 extent that the Plaintiffs have been able to observe Defendant Postal Service's practices at San
18 Francisco SRO residential hotels, the City believes that the following SROs receive single-point
19 delivery. This list may not be exhaustive.

	SRO NAME	ST. NO.	STREET NAME	ZIP
20		479	03RD ST	94107
	KENNEDY	4544	03RD ST	94124
21	OAKWOOD	44	05TH ST	94103
	WINSOR	20	06TH ST	94103
22	WHITAKER	41	06TH ST	94103
	DESMOND	42	06TH ST	94103
23	OAK TREE	45	06TH ST	94103
	BALDWIN HOUSE	74	06TH ST	94103
24	HART	93	06TH ST	94103
	HUNTER	102	06TH ST	94103
25	SUNNYSIDE	135	06TH ST	94103
	MINNALEE	149	06TH ST	94103
26	UNITED	152	06TH ST	94103
	SUNSET	161	06TH ST	94103
27	ST CLOUD	170	06TH ST	94103
	SHARON	226	06TH ST	94103

1 topic of the Interrogatory, no matter how distant or tangential. Subject to and without waiving those
2 objections, the City adopts all of the allegations of Paragraph 30 of the Complaint as fact and
3 incorporates by reference its Answers to Interrogatories 8-24.

4 Dated: June 17, 2010

5 DENNIS J. HERRERA
6 City Attorney
7 DANNY CHOU
8 SHERRI SOKELAND KAISER
9 TARA M. STEELEY
10 Deputy City Attorneys

11 By: 

12 SHERRI SOKELAND KAISER

13 Attorneys for Plaintiff
14 CITY AND COUNTY OF SAN FRANCISCO
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 4

1 DENNIS J. HERRERA, City Attorney (State Bar No. 139669)
2 DANNY CHOU (State Bar No. 180240)
3 Chief of Complex and Special Litigation
4 SHERRI SOKELAND KAISER (State Bar No. 197986)
5 E-mail: sherri.kaiser@sfgov.org
6 TARA M. STEELEY (State Bar No. 231775)
7 E-mail: tara.steeley@sfgov.org
8 Deputy City Attorneys
9 CITY ATTORNEY'S OFFICE
10 City Hall, Room 234
11 1 Dr. Carlton B. Goodlett Place
12 San Francisco, California 94102-4682
13 Telephone: (415) 554-4691
14 Facsimile: (415) 554-4747

15 Attorneys for Plaintiff
16 CITY AND COUNTY OF SAN FRANCISCO

17 MICHAEL M. MARKMAN (State Bar No. 191388)
18 E-mail: mmarkman@cov.com
19 KELLY P. FINLEY (State Bar No. 247519)
20 E-mail: kfinley@cov.com
21 JOSHUA D. HURWIT (State Bar No. 263108)
22 E-mail: jhurwit@cov.com
23 COVINGTON & BURLING LLP
24 One Front Street
25 San Francisco, CA 94111
26 Telephone: 415.591.6000
27 Facsimile: 415.591.6091

28 Attorneys for Plaintiffs
CITY AND COUNTY OF SAN FRANCISCO,
CENTRAL CITY SRO COLLABORATIVE,
SAN FRANCISCO TENANTS UNION, and
HOUSING RIGHTS COMMITTEE OF SAN FRANCISCO

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CITY AND COUNTY OF SAN
FRANCISCO, et al.,

Plaintiffs,

v.

UNITED STATES POSTAL SERVICE,
et al.,

Defendants.

Civil Case No.: 3:09-cv-01964-RS (EDL)

**PLAINTIFF CITY AND COUNTY OF
SAN FRANCISCO'S RESPONSES TO
DEFENDANT UNITED STATES
POSTAL SERVICE'S
INTERROGATORIES (SET TWO)**

1 Subject to and without waiving the foregoing objections, the City responds as
2 follows:

- 3 • A 2009 survey of 82 SRO owners asked an open-ended question about the average
4 length of a tenants' stay. Of the 66 returned and quantifiable responses, 65% (43)
5 reported an average length of stay of over one year.
- 6 • Large numbers of seniors live in SROs and these individuals are unlikely to be transient.
7 For example, one study compiled a profile of 11,600 individuals living in SROs who
8 receive some form of public assistance. The 11,600 individuals represented 63% of all
9 SRO residents. Of these 11,600 individuals, the average age was 55. Nearly half (5,578
10 or 48%) of these residents received Social Security, and their average age was 62. And
11 approximately 20% (2,374) of the profiled residents received in-home support services.
12 Their average age was 67.
- 13 • As of February 10, 2011, the average length of stay for a tenant in a Tenderloin Housing
14 Clinic ("THC") Master Lease SRO was 39 months. This data goes back to 1999 when
15 THC first became a Master Lease SRO contractor. In 1999 THC started with three sites.
16 It now operates 16 sites with 1,582 units.
- 17 • For the period of July 1, 2009 through June 30, 2010, fully 78% of the individuals
18 staying in SROs run by the THC had resided at their SRO for at least a year. The overall
19 housing stability percentage for the same buildings over the same period was 95%. The
20 housing stability percentage measures the number of residents from one year earlier who
21 either continued in residence or who had moved into another stable, rent-paying housing
22 situation.
- 23 • For the 2008-2009 fiscal year, the 27 Master Lease SROs, including 2,494 units, had a
24 93.2% stability percentage.

25 **INTERROGATORY NO. 28:**

26 If you contend the U.S. Postal Service at any time since 2006 has provided
27 centralized mail delivery to SRO buildings in other cities, explain your contention in detail and
28 identify all facts, documents and witnesses that support it.

1 **RESPONSE TO INTERROGATORY NO. 28:**

2 The City incorporates the foregoing General Objections into its response as if set
3 forth verbatim herein. The City further objects to this interrogatory to the extent that it seeks
4 information protected by the attorney-client privilege, the work product doctrine, the joint
5 prosecution privilege, and any other legal protection. The City will not produce information
6 subject to any such privilege or protection. The City further objects to this interrogatory as
7 vague and ambiguous because it does not define the key term “SRO.” The City further objects
8 to this interrogatory as overbroad and unduly burdensome to the extent it requests identification
9 of documents. Such identification will not be provided in response to this interrogatory.

10 Subject to and without waiving the foregoing objections, the City responds as
11 follows:

- 12 • On information and belief, the Times Square Hotel, 255 W. 43rd Street, New York, NY,
13 host to 653 single room occupancy rooms, has centralized delivery.
- 14 • On information and belief, the Lawson House YMCA, 30 W. Chicago Avenue, Chicago,
15 IL, the “largest single-room occupancy (SRO) supportive housing facility in the
16 Midwest” (<http://www.ymcachgo.org/locations/LawsonHouseYMCA.php>), has
17 centralized delivery.
- 18 • On information and belief, the California Hotel, 3501 San Pablo Avenue, Oakland, CA,
19 is an SRO and has received centralized mail delivery to individual locked mailboxes for
20 each of its 149 rooms for at least the past two years, and likely at least the past ten to
21 fifteen years.

22 **INTERROGATORY NO. 29:**

23 For each SRO in San Francisco, identify the name of each HOTEL TAX/FEE
24 imposed in each year since 2004, the amount/rate of each HOTEL TAX/FEE imposed for each
25 year since 2004, the total amount of each HOTEL TAX/FEE imposed each year since 2004, and
26 the total amount of each HOTEL TAX/FEE collected each year since 2004. “HOTEL TAX”
27 means any hotel license assessment fee, any transient occupancy tax, any tourism improvement
28 tax, and any other kind of tax/fee assessed or imposed by the City and County of San Francisco

1 objects to this request as overbroad and unduly burdensome as tourist hotels are not an issue in
2 this case.

3 Subject to and without waiving the foregoing objections, the City responds as
4 follows: The attached document titled "Active San Francisco Hotels as of 3/24/11" provides an
5 up-to-date list of buildings that currently qualify as tourist hotels pursuant to Section 890.46 of
6 the San Francisco Planning Code. The City will supplement this response if similar lists are
7 located for any time between January 1, 2006, and the present.

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: March 28, 2011

By: *Sherri S. Kaiser / pm*

Sherri Sokeland Kaiser
Tara M. Steeley

Attorneys for Plaintiff
CITY AND COUNTY OF SAN
FRANCISCO

Michael M. Markman
Kelly P. Finley
Joshua D. Hurwit

Attorneys for Plaintiffs
CITY AND COUNTY OF SAN
FRANCISCO, CENTRAL CITY SRO
COLLABORATIVE, SAN
FRANCISCO TENANTS UNION,
and HOUSING RIGHTS
COMMITTEE OF SAN FRANCISCO

EXHIBIT 5

1 MELINDA HAAG (SBN 132612)
United States Attorney
2 JOANN M. SWANSON (CSBN 88143)
Chief, Civil Division
3 JONATHAN U. LEE (CSBN 148792)
THOMAS R. GREEN (CSBN 203480)
4 VICTORIA R. CARRADERO (CABN 217885)
Assistant United States Attorneys

5
6 450 Golden Gate Avenue, 9th Floor
San Francisco, California 94102-3495
7 Telephone: (415) 436-7200
Facsimile: (415) 436-6748
8 E-mail: jonathan.lee@usdoj.gov
thomas.green@usdoj.gov
victoria.carradero@us.doj.gov

9
10 Attorneys for Federal Defendant
UNITED STATES POSTAL SERVICE

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 CITY AND COUNTY OF SAN
FRANCISCO, CENTRAL CITY SRO
16 COLLABORATIVE, SAN FRANCISCO
TENANTS UNION, and HOUSING
17 RIGHTS COMMITTEE OF SAN
FRANCISCO

18 Plaintiffs,

19 vs.

20 UNITED STATES POSTAL SERVICE,
21 Defendant.

Case No. 09-1964 RS

**UNITED STATES POSTAL
SERVICE'S RESPONSES TO THE
CITY AND COUNTY OF SAN
FRANCISCO'S REQUEST FOR
ADMISSIONS (SET ONE)**

22
23 **REQUESTING PARTY:** CITY AND COUNTY OF SAN FRANCISCO

24 **RESPONDING PARTY:** UNITED STATES POSTAL SERVICE

25
26 **SET NO.:** ONE

1 REQUEST FOR ADMISSION NO. 20:

2 Admit that the Postal Service makes its best effort to provide Centralized Delivery
3 (which means the method of mail delivery to multi-unit buildings in which a letter carrier places
4 the mail into centrally located, locked mailboxes, and there is one mailbox separately assigned to
5 each residential unit) to residential buildings containing apartments occupied by different
6 addressees where the buildings satisfy the conditions in POM Section 631.451.

7 RESPONSE TO ADMISSION NO. 20.

8 The RFA is disjunctive, compound, overbroad, presents a vague and ambiguous and
9 otherwise improper hypothetical and, thus, calls for speculation. Moreover, the definition for
10 "Centralized Delivery" is vague and ambiguous, compound, lacks foundation, assumes facts, and
11 is overbroad. Many other terms/phrases including, but not limited to the terms "makes its best
12 efforts to provide," "residential buildings containing apartments occupied by different
13 addressees," "where the buildings satisfy the conditions" lack foundation and are vague and
14 ambiguous, overbroad, and call for speculation. The Postal Service does not generally use the
15 term "best effort" in conjunction with the setting of the mode of delivery at a residential address.
16 The phrase "best effort" is particularly vague, ambiguous and unintelligible in the context of an
17 RFA. Subject to and without waiving its objections, the Postal Service responds as follows:
18 Construing this RFA to be asking the Postal Service to admit that it does all that it can to provide
19 centralized delivery to all buildings possessing each characteristic described in subheadings a.
20 through d. of 631.451, irrespective of any other facts, the Postal Service denies this RFA.

21 REQUEST FOR ADMISSION NO. 21:

22 Admit that the Postal Service makes its best effort to provide Centralized Delivery
23 (which means the method of mail delivery to multi-unit buildings in which a letter carrier places
24 the mail into centrally located, locked mailboxes, and there is one mailbox separately assigned to
25
26
27
28

1 each residential unit) to residential buildings containing units occupied by different addressees
2 where the buildings satisfy the conditions in POM Section 631.451.

3 RESPONSE TO ADMISSION NO. 21.

4 The RFA is disjunctive, compound, overbroad, presents a vague and ambiguous and
5 otherwise improper hypothetical and, thus, calls for speculation. Moreover, the definition for
6 “Centralized Delivery” is vague and ambiguous, compound, lacks foundation, assumes facts, and
7 is overbroad. Many other terms/phrases including, but not limited to the terms “makes its best
8 efforts to provide,” “residential buildings containing units occupied by different addressees,”
9 “where the buildings satisfy the conditions” lack foundation and are vague and ambiguous,
10 overbroad, and call for speculation. The Postal Service does not generally use the term “best
11 effort” in conjunction with the setting of the mode of delivery at a residential address. The
12 phrase “best effort” is particularly vague, ambiguous and unintelligible in the context of an RFA.
13 Subject to and without waiving its objections, the Postal Service responds as follows:

14
15 Construing this RFA to be asking the Postal Service to admit that it does all that it can to provide
16 centralized delivery to all buildings possessing each characteristic described in subheadings a.
17 through d. of 631.451, irrespective of any other facts, the Postal Service denies this RFA.

18
19 REQUEST FOR ADMISSION NO. 22:

20 Admit that the Postal Service makes its best effort to provide Centralized Delivery
21 (which means the method of mail delivery to multi-unit buildings in which a letter carrier places
22 the mail into centrally located, locked mailboxes, and there is one mailbox separately assigned to
23 each residential unit) to residential buildings containing condominiums where the buildings
24 satisfy the conditions in POM Section 631.451.

25
26 RESPONSE TO ADMISSION NO. 22.

1 RESPONSE TO ADMISSION NO. 35.

2 By requiring a single admission for seven different buildings located at seven different
3 addresses each with different characteristics, the RFA is impermissibly compound. Furthermore,
4 one address on Exhibit 1 is not on the list of hotels designated by CCSF as one of the SRO hotels
5 and, accordingly, is outside the scope of the litigation. The RFA further includes terms/phrases
6 that lack foundation, are vague and ambiguous, and otherwise are overbroad including, but not
7 limited to the terms/phrases “grouping,” “mail delivery boxes,” and “at a single point.” The term
8 “single point” is particularly vague and ambiguous in this interrogatory because it is a term that
9 typically refers to delivery of all mail to a building being delivered to a single location or person,
10 where here the interrogatory implies that there are multiple delivery boxes. Subject to and
11 without waiving its objections, the Postal Service responds as follows: Construing the request to
12 mean that the Postal Service is being asked to admit that delivery to multiple delivery boxes
13 would constitute single point delivery, the Postal Service denies the request.

14 REQUEST FOR ADMISSION NO. 36:

15 Admit that the Postal Service will not provide Centralized Delivery (which means the
16 method of mail delivery to multi-unit buildings in which a letter carrier places the mail into
17 centrally located, locked mailboxes, and there is one mailbox separately assigned to each
18 residential unit) to San Francisco SROs that did not already receive Centralized Delivery 90 days
19 before December 18, 2008 regardless of the presence of any Postal Service-approved mail boxes
20 at those buildings.

21 RESPONSE TO ADMISSION NO. 36.

22 The definition for “Centralized Delivery” is vague and ambiguous, compound, lacks
23 foundation, assumes facts, and is overbroad. Many other terms/phrases including, but not
24 limited to the terms “SROs,” “that did not already receive,” “regardless of the presence,” and
25
26
27
28

1 “any Postal Service-approved mail boxes,” lack foundation and are vague and ambiguous, and
2 overbroad. Moreover, this RFA is disjunctive and compound in that it relates to several hundred
3 possible addresses. It is overbroad, presents a vague and ambiguous and otherwise improper
4 hypothetical and, thus, calls for speculation. Subject to and without waiving its objections, the
5 Postal Service responds as follows: Construing this RFA to be asking the Postal Service to admit
6 that it will not in mass convert the mode of delivery at all SRO hotels in San Francisco currently
7 receiving single point delivery on the basis of the limited facts presented to the Postal Service by
8 the SRO hotels themselves and the plaintiffs in this action, the Postal Service admits this RFA.
9 Nothing forecloses the owners and/or managers of San Francisco SRO hotels that receive single
10 point delivery from utilizing installed mail receptacles to distribute mail to each room in the
11 hotel, as countless other buildings do which receive single point delivery.
12

13 REQUEST FOR ADMISSION NO. 37:

14 Admit that the Postal Service will not provide Centralized Delivery (which means the
15 method of mail delivery to multi-unit buildings in which a letter carrier places the mail into
16 centrally located, locked mailboxes, and there is one mailbox separately assigned to each
17 residential unit) to San Francisco SROs that did not already receive Centralized Delivery 90 days
18 before December 18, 2008 regardless of the potential future installation of any Postal Service-
19 approved mail boxes at those buildings.
20

21 RESPONSE TO ADMISSION NO. 37.

22 The definition for “Centralized Delivery” is vague and ambiguous, compound, lacks
23 foundation, assumes facts, and is overbroad. Many other terms/phrases including, but not
24 limited to the terms “San Francisco SROs” “that did not already receive” “regardless of the
25 potential future installation” “any Postal Service-approved mail boxes” lack foundation and are
26 vague and ambiguous, and overbroad. Moreover, this RFA is disjunctive and compound in that
27
28

1 it relates to several hundred possible addresses. It is also overbroad, presents a vague and
2 ambiguous and otherwise improper hypothetical and, thus, calls for speculation. Subject to and
3 without waiving its objections, the Postal Service responds as follows: Construing this RFA to
4 be asking the Postal Service to admit that it will not in mass convert the mode of delivery at all
5 SRO hotels in San Francisco currently receiving single point delivery on the basis of the limited
6 facts presented to the Postal Service by the SRO hotels themselves and the plaintiffs in this
7 action, the Postal Service admits this RFA. Nothing forecloses the owners and/or managers of
8 San Francisco SRO hotels that receive single point delivery from utilizing installed mail
9 receptacles to distribute mail to each room in the hotel, as countless other buildings do which
10 receive single point delivery.
11

12 REQUEST FOR ADMISSION NO. 38:

13 Admit that the Postal Service is permitted to use different modes of mail delivery in the
14 same building when that building contains both multi-unit residential and one or more
15 commercial uses.
16

17 RESPONSE TO ADMISSION NO. 38.

18 Many of the terms/phrases in the RFA including, but not limited to “is permitted,”
19 “different modes of mail delivery,” “in the same building,” “multi-unit residential,” and
20 “commercial uses” are overbroad, vague, and ambiguous and require the Postal Service to
21 speculate as to the precise nature of the admission requested. The RFA also includes an
22 improper hypothetical that lacks foundation and requires speculation. Subject to and without
23 waiving its objections, the Postal Service responds by admitting that it is within the Postal
24 Service’s discretion to utilize different modes of delivery within a single building depending on
25 the circumstances.
26
27
28

1 REQUEST FOR ADMISSION NO. 39:

2 Admit that, in one or more buildings in San Francisco that contain both multi-unit
3 residential and one or more commercial uses, the Postal Service uses different modes of mail
4 delivery in the same building.

5 RESPONSE TO ADMISSION NO. 39.

6 Many of the terms/phrases in the RFA including, but not limited to “one or more,”
7 “buildings,” “is permitted,” “different modes of mail delivery,” “in the same building,” “multi-
8 unit residential,” and “commercial uses” are overbroad, vague, and ambiguous and require the
9 Postal Service to speculate as to the precise nature of the admission requested. The RFA also
10 includes an improper hypothetical that lacks foundation and requires speculation. Subject to and
11 without waiving its objections, the Postal Service responds by admitting that in some buildings
12 receiving centralized delivery, a single drop may be made somewhere within the buildings,
13 depending on the circumstances.
14
15
16
17
18
19

20 Respectfully submitted,

21 MELINDA HAAG
22 United States Attorney

23 Dated: April 27, 2011

24 
25 _____
26 JONATHAN U. LEE
27 THOMAS R. GREEN
28 VICTORIA R. CARRADERO
Assistant United States Attorneys
Attorneys for the United States Postal
Service

EXHIBIT 6

1 DENNIS J. HERRERA, State Bar #139669
City Attorney
2 DANNY CHOU, State Bar #180240
Chief of Complex and Special Litigation
3 SHERRI SOKELAND KAISER, State Bar #197986
TARA M. STEELEY, State Bar #231775
4 Deputy City Attorneys
City Hall, Room 234
5 1 Dr. Carlton B. Goodlett Place
San Francisco, California 94102-4682
6 Telephone: (415) 554-4691
Facsimile: (415) 554-4747
7 E-Mail: sherri.kaiser@sfgov.org

8 Attorneys for Plaintiff
CITY AND COUNTY OF SAN FRANCISCO

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 CITY AND COUNTY OF SAN
13 FRANCISCO, CENTRAL CITY SRO
COLLABORATIVE, SAN FRANCISCO
14 TENANTS UNION, and HOUSING RIGHTS
COMMITTEE OF SAN FRANCISCO

15 Plaintiffs,

16 vs.

17 UNITED STATES POSTAL SERVICE,
18 Defendant.

Case No. C09-1964 RS

**PLAINTIFF CITY AND COUNTY OF SAN
FRANCISCO'S RESPONSES TO DEFENDANT
UNITED STATES POSTAL SERVICE'S FIRST
SET OF INTERROGATORIES**

23 PROPOUNDING PARTY: UNITED STATES POSTAL SERVICE

24 RESPONDING PARTY: CITY AND COUNTY OF SAN FRANCISCO

25 SET NO.: ONE

1	CRESENT MANOR	467	TURK ST	94102
	VANTAGGIO SUITES	835	TURK ST	94102
2	UNION	1510	UNION ST	94123
		2186	UNION ST	94123
3	ROYAN	405	VALENCIA ST	94103
	APOLLO	422	VALENCIA ST	94103
4	INVERNESS BLDG	1405	VAN NESS AV	94109
	MASARWEH	2420	VAN NESS AV	94109
5	WASHBURN HOUSING CORP	42	WASHBURN ST	94103
		858	WASHINGTON ST	94108
6		874	WASHINGTON ST	94108
		29	WAVERLY PL	94108
7		124	WAVERLY PL	94108
		24	WENTWORTH ST	94108

8
9
10 **INTERROGATORY NO. 3:**

11 Identify all SROs in the City and County of San Francisco that receive delivery of United
12 States mail by single point delivery.

13 **RESPONSE TO INTERROGATORY NO. 3:**

14 The method of mail delivery at any given address is a matter uniquely within the knowledge of
15 Defendant Postal Service, which provides mail delivery service to all San Francisco SRO residential
16 hotels and unilaterally controls the method of delivery it uses at those buildings. However, to the
17 extent that the Plaintiffs have been able to observe Defendant Postal Service's practices at San
18 Francisco SRO residential hotels, the City believes that the following SROs receive single-point
19 delivery. This list may not be exhaustive.

	SRO NAME	ST. NO.	STREET NAME	ZIP
20		479	03RD ST	94107
	KENNEDY	4544	03RD ST	94124
21	OAKWOOD	44	05TH ST	94103
	WINSOR	20	06TH ST	94103
22	WHITAKER	41	06TH ST	94103
	DESMOND	42	06TH ST	94103
23	OAK TREE	45	06TH ST	94103
	BALDWIN HOUSE	74	06TH ST	94103
24	HART	93	06TH ST	94103
	HUNTER	102	06TH ST	94103
25	SUNNYSIDE	135	06TH ST	94103
	MINNALEE	149	06TH ST	94103
26	UNITED	152	06TH ST	94103
	SUNSET	161	06TH ST	94103
27	ST CLOUD	170	06TH ST	94103
	SHARON	226	06TH ST	94103

1	RAM'S HOTEL 80	80	09TH ST	94103
	PHILLIPS	205	09TH ST	94103
2	NORMANDIE	251	09TH ST	94103
	CIVIC CENTER	20	12TH ST	94103
3	ALL STAR	2791	16TH ST	94103
	JERRY	3032	16TH ST	94103
4	EULA	3061	16TH ST	94103
	ALBION	3143	16TH ST	94103
5	16TH STREET	3161	16TH ST	94103
	TROPICAL	3562	20TH ST	94110
6	LEXINGTON APTS	3270	21ST ST	94110
	RUBY ROSE	732	22ND ST	94107
7		3414	25TH ST	94110
	SALVATION ARMY	2685	30TH AV	94116
8		55	30TH ST	94110
	SALVATION ARMY	3550	ARMY ST	94110
9	BRICKS	712	BATTERY ST	94111
		371	BROADWAY ST	94133
10		381	BROADWAY ST	94133
		402	BROADWAY ST	94133
11		407	BROADWAY ST	94133
		438	BROADWAY ST	94133
12		461	BROADWAY ST	94133
		517	BROADWAY ST	94133
13		527	BROADWAY ST	94133
		554	BROADWAY ST	94133
14		672	BROADWAY ST	94133
		673	BROADWAY ST	94133
15		686	BROADWAY ST	94133
		691	BROADWAY ST	94133
16	COSMOPOLITAN	754	BROADWAY ST	94133
		785	BROADWAY ST	94133
17		527	BRYANT ST	94107
	ALISA	447	BUSH ST	94108
18	ASTORIA	510	BUSH ST	94108
	BALMORAL RESIDENCE CLUB	1010	BUSH ST	94109
19		1485	BUSH ST	94109
	CABLE CAR	1388	CALIFORNIA ST	94109
20	DOREL	1507	CALIFORNIA ST	94109
	STANLEY	1544	CALIFORNIA ST	94109
21	CARL	198	CARL ST	94117
	JUSTICE	640	CLAY ST	94111
22	CHINESE COMM HSG CORP	657	CLAY ST	94111
	ROYAL	668	CLAY ST	94111
23	NAM PING BENE ASSN	721	CLAY ST	94108
		755	CLAY ST	94108
24		817	CLAY ST	94108
	SAN FRANCISCO	857	CLAY ST	94108
25	HOY YEN ASSN OF SF	67	COLUMBUS AV	94111
	SAN JOAQUIN	112	COLUMBUS AV	94133
26	SUSIE	237	COLUMBUS AV	94133
	EVERGREEN	301	COLUMBUS AV	94133
27				
28				

1	COLUMBUS	331	COLUMBUS AV	94133
	LIGURIA	354	COLUMBUS AV	94133
2	IL TRIANGOLO	371	COLUMBUS AV	94133
		524	COLUMBUS AV	94133
3	ENTEELLA	575	COLUMBUS AV	94133
	GOOD WORLD	905	COLUMBUS AV	94133
4	PEARL CITY	688	COMMERCIAL ST	94111
	KIRAN	21	COOPER AL	94133
5	K & H	128	EDDY ST	94102
	KINNEY	395	EDDY ST	94102
6	ALLEN	410	EDDY ST	94109
	FAIRFAX	411	EDDY ST	94109
7	ADRIAN	420	EDDY ST	94109
	SONOMA HALL	493	EDDY ST	94109
8	ARTMAR	587	EDDY ST	94109
	ELLIS	433	ELLIS ST	94102
9	MARATHON HOTEL & APTS	465	ELLIS ST	94102
10	PING ON	710	ELLIS ST	94109
	OAK	2	EMERY LN	94133
11	DEBRE DAMO	171	FELL ST	94102
	PARK	106	FERN ST	94109
12	FOLK ON	1040	FOLSOM ST	94103
	ST VINCENT DE PAUL SOC	75	FRESNO ST	94133
13		6324	GEARY BL	94121
	JALARAM	630	GEARY ST	94102
14	CALIFORNIA	725	GEARY ST	94109
	EARLE	910	GEARY ST	94109
15	SUEY WING BENE ASSN	284	GOLDEN GATE AV	94102
	HONG SANG MARKET INC	915	GRANT AV	94108
16	HUNAN	1134	GRANT AV	94133
	FRESNO ST	1226	GRANT AV	94133
17		1232	GRANT AV	94133
	CHIPPENDALE	933A	GRANT AV	94108
18	ORLANDO	492	GROVE ST	94102
	BALBOA	995	HOWARD ST	94103
19	HYDE REGENCY	120	HYDE ST	94102
	TUNG HWA BENE ASSN	1531	HYDE ST	94109
20	TSUNG TSIN ASSN	610	JACKSON ST	94133
		617	JACKSON ST	94133
21		629	JACKSON ST	94133
	KWAN CHART	706	JACKSON ST	94133
22		840	JACKSON ST	94133
	BEL AIR	344	JONES ST	94102
23	RIVIERA	420	JONES ST	94102
	JONES	515	JONES ST	94102
24	LAYNE	545	JONES ST	94102
	NAZARETH	556	JONES ST	94102
25	GAYLORD	620	JONES ST	94102
	KRUPA	700	JONES ST	94109
26	BALMORAL	706	KEARNY ST	94108
		833	KEARNY ST	94108
27		901	KEARNY ST	94133
28				

1	ST PAUL	935	KEARNY ST	94133
	YALE	633	LARKIN ST	94109
2	YOGI	664	LARKIN ST	94109
	SUTTER LARKIN	1048	LARKIN ST	94109
3	HARCOURT	1105	LARKIN ST	94109
	PAGE	161	LEAVENWRTH ST	94102
4	HURLEY	201	LEAVENWRTH ST	94102
	WESTERN	335	LEAVENWRTH ST	94102
5	BRIDGE	2524	LOMBARD ST	94123
	MARIPOSA TRUST	2901	MARIPOSA ST	94110
6	NATIONAL	1139	MARKET ST	94103
	DONNELLY	1272	MARKET ST	94102
7	CHASE	1278	MARKET ST	94102
	GOLDEN GATE	1412	MARKET ST	94102
8	ASCOT	1657	MARKET ST	94103
	TWIN PEAKS	2160	MARKET ST	94114
9	PERRAMONT	2162	MARKET ST	94114
	BRISTOL	56	MASON ST	94102
10	ABIGAIL	246	MCALLISTER ST	94102
	AUBURN	481	MINNA ST	94103
11	CHRONICLE	936	MISSION ST	94103
	ALKAIN	948	MISSION ST	94103
12	KEAN	1018	MISSION ST	94103
	POTTER	1288	MISSION ST	94103
13	1906 MISSION	1906	MISSION ST	94103
		2030	MISSION ST	94110
14		2032	MISSION ST	94110
		2042	MISSION ST	94110
15	WESTMAN	2056	MISSION ST	94110
		2072	MISSION ST	94110
16	FRANCES	2084	MISSION ST	94110
	DELBEX	2126	MISSION ST	94110
17	ALBERT	2135	MISSION ST	94110
	PRITA	2284	MISSION ST	94110
18	EL CAPITAN	2361	MISSION ST	94110
	THOMAS	2370	MISSION ST	94110
19	ANDORA INN	2438	MISSION ST	94110
	AKU	2477	MISSION ST	94110
20		2522	MISSION ST	94110
21	CRYSTAL	2766	MISSION ST	94110
	GRAYWOOD	3308	MISSION ST	94110
22	MARILYN INN	27	MONROE ST	94108
	IVY	539	OCTAVIA ST	94102
23	ST MORITZ	190	OFARRELL ST	94102
	SPAULDING	240	OFARRELL ST	94102
24	COLUMBIA	411	OFARRELL ST	94102
	WINTON	445	OFARRELL ST	94102
25	SAN FRANCISCO INN	579	OFARRELL ST	94102
		587	OFARRELL ST	94102
26	ADMIRAL	608	OFARRELL ST	94109
	EDGEWORTH	770	OFARRELL ST	94109
27	AMBIKA	788	OFARRELL ST	94109
28				

1	BRYAN J FARRELL	801	PACIFIC AV	94133
		2137	PACIFIC AV	94115
2	EL DRISCO	2141	PACIFIC AV	94115
	INN 1890	2901	PACIFIC AV	94115
3	BAKER	1890	PAGE ST	94117
	EMBASSY	1485	PINE ST	94109
4	NAPA HALL	610	POLK ST	94102
	NEW PACIFIC	626	POLK ST	94102
5	SHIRLEY	706	POLK ST	94109
	BROADWAY	1544	POLK ST	94109
6	DAKOTA	2048	POLK ST	94109
	WELLES	606	POST ST	94109
7	AMERICA	908	POST ST	94109
	MERIT	1075	POST ST	94109
8		1105	POST ST	94109
		1362	POWELL ST	94133
9	BASQUE	17	ROMOLO PL	94133
	LOUIE	666	SACRAMENTO ST	94111
10	YMCA OF SAN FRANCISCO	855	SACRAMENTO ST	94108
	PALO ALTO	1685	SACRAMENTO ST	94109
11	JORDAN'S GUEST HOUSE	2263	SACRAMENTO ST	94115
	ITALIAN-AMERICAN	838	SANSOME ST	94111
12		4	SPOFFORD AL	94108
		31	SPOFFORD AL	94108
13		32	SPOFFORD AL	94108
		39	SPOFFORD AL	94108
14	MOU YOUNG FONG ASSN	44	SPOFFORD AL	94108
		48	SPOFFORD AL	94108
15	CHINESE AMER CIT ALLIANCE	1044	STOCKTON ST	94108
	TANG FAT	1334	STOCKTON ST	94133
16	FLORENCE	1351	STOCKTON ST	94133
	SESTRI	1411	STOCKTON ST	94133
17	MITHILA	972	SUTTER ST	94109
	GRANADA	1000	SUTTER ST	94109
18	RAPHAEL HOUSE OF SF	1065	SUTTER ST	94109
	BROADMOOR	1499	SUTTER ST	94109
19	KENMORE	1570	SUTTER ST	94109
	WARFIELD	118	TAYLOR ST	94102
20	MODERNE	162	TAYLOR ST	94102
	TAYLOR	615	TAYLOR ST	94102
21	BILTMORE	735	TAYLOR ST	94108
	WINSTON ARMS	50	TURK ST	94102
22	DAHLIA	74	TURK ST	94102
	BOSTON	140	TURK ST	94102
23	HELEN	166	TURK ST	94102
	CASA MELISSA	615	UNION ST	94133
24	CROWN	528	VALENCIA ST	94110
	TROPICANA	663	VALENCIA ST	94110
25	JLARAM	868	VALENCIA ST	94110
	PRIYANKA	1041	VALENCIA ST	94110
26	ASSEMBLIES OF GOD	1462	VALENCIA ST	94110
	CATHAY	702	VALLEJO ST	94133

1	CASTRO	705	VALLEJO ST	94133
		790	VALLEJO ST	94133
2	ST CLARE	1334	VAN NESS AV	94109
		16	VIRGINIA AV	94110
3	735 WASHINGTON APTS	735	WASHINGTON ST	94108
	GUM MOON RESIDENCE HALL	940	WASHINGTON ST	94108
4	CATTLEMENS	3900	03RD ST	94124
	SHREE GANESHAI	68	06TH	94103
5	HAVELI	37	06TH ST	94103
	LAWRENCE	48	06TH ST	94103
6	HILLSDALE	51	06TH ST	94103
	HENRY	106	06TH ST	94103
7	ALDER	175	06TH ST	94103
	ELITE	311	11TH AV	94118
8	MORRILL RETIRE	3429	ANZA ST	94121
	MORRILL RETIRE	3433	ANZA ST	94121
9		636	BROADWAY ST	94133
		637	BROADWAY ST	94133
10		730	BROADWAY ST	94133
	LORRAINE	740	BROADWAY ST	94133
11	GRANT	753	BUSH ST	94108
	MARY ELIZABETH INN	1040	BUSH ST	94109
12		731	CLAY ST	94108
		1627	CLAY ST	94109
13	DRAKE	235	EDDY ST	94102
	ELM	364	EDDY ST	94102
14	EDDY	640	EDDY ST	94109
	GLOBETROTTERS INN	225	ELLIS ST	94102
15	MENTONE	387	ELLIS ST	94102
16		719	ELLIS ST	94109
		3143	FILLMORE ST	94123
17	COVERED WAGON	917	FOLSOM ST	94107
	FOLSOM	977	FOLSOM ST	94107
18	HON'S	517	GREEN ST	94133
	ELDRICH	439	JONES ST	94102
19	MERCY HOUSING	520	JONES ST	94102
	WOMEN'S	642	JONES ST	94102
20	HALCYON	649	JONES ST	94102
	JULIAN	179	JULIAN AV	94103
21	STANFORD	250	KEARNY ST	94108
	ALLEN	1693	MARKET ST	94103
22	GRAND SOUTHERN	1941	MISSION ST	94103
	NORMA	2697	MISSION ST	94110
23	AMAZON	5060	MISSION ST	94112
	ACER	280	OFARRELL ST	94102
24	GATEWAY INN	438	OFARRELL ST	94102
	GARLAND	505	OFARRELL ST	94102
25	COAST	516	OFARRELL ST	94102
	SWEDEN HOUSE	570	OFARRELL ST	94102
26	LOTUS	580	OFARRELL ST	94102
		601	OFARRELL ST	94109
27		630	PACIFIC AV	94133
28				

1	POST	752	PACIFIC AV	94133
		589	POST ST	94102
2		1010	POST ST	94109
	HERBERT	161	POWELL ST	94102
3	MONROE	1870	SACRAMENTO ST	94109
	PHIL-AM	1323	STOCKTON ST	94133
4	GRAND PACIFIC	1331	STOCKTON ST	94133
	PARK	325	SUTTER ST	94108
5	USA HOSTELS	717	SUTTER ST	94109
	SYCAMORE	30	SYCAMORE ST	94110
6	ARANDA	62	TURK ST	94102
	UTAH	1312	UTAH ST	94110
7	SUNRISE	447	VALENCIA ST	94103
	HOUSING DEV & NBRHD PRES	504	VALENCIA ST	94110
8	CURTIS	559	VALENCIA ST	94110
	HOY-SUN NING YUNG BENE	41	WAVERLY PL	94108
9	ARDEN WOOD BENEVOLENT	445	WAWONA ST	94116
	ASSN			
10	LAUS INVEST GRP	1430	LARKIN ST	94109
		966	PINE ST	94108
11		1026	PINE ST	94109

12

13 **INTERROGATORY NO. 4:**

14 Identify all residential addresses, other than SROs, located in the City and County of San
 15 Francisco that receive delivery of United States mail by "centralized" delivery.

16 **INTERROGATORY NO. 4:**

17 The method of mail delivery at any given address is a matter uniquely within the knowledge of
 18 Defendant Postal Service, which provides mail delivery service and unilaterally controls the method of
 19 delivery it uses to deliver the mail. Plaintiffs have undertaken to observe Defendant Postal Service's
 20 practices at most San Francisco SRO residential hotels, but the City has not had reason to observe the
 21 method of mail delivery at all residential addresses, nor does the City require its residents to report this
 22 information.

23 **INTERROGATORY NO. 5:**

24 Identify all residential addresses, other than SROs, located in the City and County of San
 25 Francisco that receive delivery of United States mail by single point delivery.

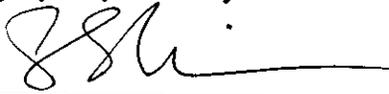
26 **RESPONSE TO INTERROGATORY NO. 5:**

27 Again, the method of mail delivery at any given address is a matter uniquely within the
 28 knowledge of Defendant Postal Service, which provides mail delivery service and unilaterally controls

1 topic of the Interrogatory, no matter how distant or tangential. Subject to and without waiving those
2 objections, the City adopts all of the allegations of Paragraph 30 of the Complaint as fact and
3 incorporates by reference its Answers to Interrogatories 8-24.

4 Dated: June 17, 2010

5 DENNIS J. HERRERA
6 City Attorney
7 DANNY CHOU
8 SHERRI SOKELAND KAISER
9 TARA M. STEELEY
10 Deputy City Attorneys

11 By: 

12 SHERRI SOKELAND KAISER

13 Attorneys for Plaintiff
14 CITY AND COUNTY OF SAN FRANCISCO
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 7

1 MELINDA HAAG (SBN 132612)
United States Attorney
2 JOANN M. SWANSON (CSBN 88143)
Chief, Civil Division
3 JONATHAN U. LEE (CSBN 148792)
THOMAS R. GREEN (CSBN 203480)
4 Assistant United States Attorneys
450 Golden Gate Avenue, 9th Floor
5 San Francisco, California 94102-3495
Telephone: (415) 436-7200
6 Facsimile: (415) 436-6748
E-mail: jonathan.lee@usdoj.gov
7 thomas.green@usdoj.gov

8 Attorneys for Federal Defendant
9 UNITED STATES POSTAL SERVICE

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 CITY AND COUNTY OF SAN
FRANCISCO, CENTRAL CITY SRO
14 COLLABORATIVE, SAN FRANCISCO
TENANTS UNION, and HOUSING
15 RIGHTS COMMITTEE OF SAN
FRANCISCO

16 Plaintiffs,

17 vs.

18 UNITED STATES POSTAL SERVICE,
19 Defendant.

Case No. 09-1964 RS

**UNITED STATES POSTAL
SERVICE'S RESPONSES TO THE
CITY AND COUNTY OF SAN
FRANCISCO'S INTERROGATORIES
(SET ONE)**

20
21 **REQUESTING PARTY:** CITY AND COUNTY OF SAN FRANCISCO

22 **RESPONDING PARTY:** UNITED STATES POSTAL SERVICE

23 **SET NO.:** ONE
24
25
26
27
28

1 seasonal, even though some families may live in them for an extended period. For
2 these developments, the only option is delivery to a single point or receptacle
3 designated by park management and approved by local Postal Service managers
4 for the receipt of mail for distribution and mail forwarding by employees of the
5 park. This method is one of the service options for permanent developments.

631.5 Colleges and Universities

631.51 Administration Buildings

Mail is delivered to principal administration buildings. Mail undeliverable as
addressed or not addressed to a specific building is delivered to the main
administration building office for further handling. At larger universities, deliver
to the different departments, colleges, faculty buildings, and principal campus
structures, such as the Chemistry Building, Engineering Building, and so forth,
provided that mail is thus addressed and the volume warrants. Delivery is not to
be made to individual administration offices.

631.52 Dormitories or Residence Halls

Mail is delivered to dormitory buildings and residence halls when addressed to a
specific building. Deliver mail in bulk to a designated representative of the
school, who then is responsible for further distribution to students. A dormitory
building or residence hall ordinarily consists of single-room units (or double
rooms with connecting bath) and separate centrally located facilities for dining
and receiving visitors. Whether located on or off campus and regardless of
private ownership, such buildings are nevertheless dormitories and either the
school or building owner is responsible for final delivery of student mail. Post
Office personnel are not to distribute mail into apartment-type mailboxes.

The regulations of the USPS are developed to operate a national postal system,
and they cannot attend to all possible scenarios in every city, state, or local setting that
has evolved or may evolve over the years, including the enactment of local or state
ordinances or laws.

INTERROGATORY NUMBER 11:

Identify all facts, documents and witnesses that support your contention that
Postal Operations Manual section 631.45 does not govern the method of delivery to be
supplied at San Francisco SRO residential hotels.

RESPONSE TO INTERROGATORY NUMBER 11:

The Postal Service incorporates by reference herein its objections and responses
to Interrogatory Nos. 1 and 10, above. Without waiving its objections and reservations,

1 and incorporating them by reference herein, the Postal Service responds as follows:

2 The form of this question depends upon an unsustainable premise that the application of
3 one regulation always and necessarily excludes all other regulations. POM 631.45 exists
4 alongside other regulations, including POM 631.6, which specifies that any conversion
5 lead to a more economical and efficient mode of service for the Postal Service.

6 POM 631.45 addresses apartment houses and delivery to those types of
7 residences; moreover, this section addresses delivery only to facilities the Postal Service
8 has already concluded constitute apartment houses. In other words, if the USPS has
9 concluded that a building is an apartment house, it remains an apartment house for
10 purposes of mail delivery regardless of terms others may choose as labels. Plaintiffs
11 incorrectly attempt to apply this regulation to the exclusion of all other regulations and
12 without considering both the policies driving postal regulations or the efficiency by
13 which all delivery services must be operated to fulfill USPS obligations to the Nation and
14 customers throughout the domestic delivery area. The correct and controlling regulations
15 are POM 615, 631.6 and DMM 508.1.7.2.

16
17
18 INTERROGATORY NUMBER 12:

19 Describe your interpretation of the term "family hotel," as that term is used in
20 POM 631.45, and identify all facts, documents and witnesses that support your
21 interpretation.

22
23 RESPONSE TO INTERROGATORY NUMBER 12:

24 The Postal Service objects to the request as compound with subparts in violation
25 of Rule 33 of the Federal Rules of Civil Procedure. The request also assumes facts not in
26 evidence, as it presumes that the Postal Service has ascribed any meaning to the term
27

1 produce documents or information subject to any such privileges. The Postal Service further
2 objects to this request as being burdensome, unreasonable and oppressive in that it could be read
3 to require the recitation of the bulk of the facts alleged in Plaintiffs' Complaint and asserted in
4 response to the Postal Service's discovery requests that relate to the individual stories of mail
5 allegedly lost or stolen prior to receipt by individual SRO Hotel residents.

6 Subject to and without waiving its objections, the Postal Service responds by stating that
7 the examples of problems associated with mail not reaching SRO occupants alleged by Plaintiffs
8 involved some action or failure to act by a third party not governed by the Postal Service, and did
9 not occur from the mode of delivery itself. Moreover, Plaintiffs do not allege that single point
10 delivery fails non-SRO businesses, institutions, or campuses or their occupants, which
11 businesses, institutions, and campuses receive single point delivery.
12

13
14
15 Respectfully submitted,

16 MELINDA HAAG
17 United States Attorney

18 Dated: September 13, 2010

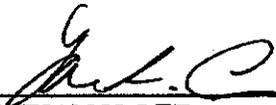
19 
20 JONATHAN U. LEE
21 THOMAS R. GREEN
22 Assistant United States Attorneys
23 Attorneys for the United States Postal
24 Service
25
26
27
28

EXHIBIT 8

1 MELINDA HAAG (SBN 132612)
 United States Attorney
 2 JOANN M. SWANSON (CSBN 88143)
 Chief, Civil Division
 3 JONATHAN U. LEE (CSBN 148792)
 THOMAS R. GREEN (CSBN 203480)
 4 VICTORIA R. CARRADERO (CSBN 217885)
 Assistant United States Attorneys
 5 450 Golden Gate Avenue, 9th Floor
 San Francisco, California 94102-3495
 6 Telephone: (415) 436-7200
 Facsimile: (415) 436-6748
 7 E-mail: jonathan.lee@usdoj.gov
thomas.green@usdoj.gov

8
 9 Attorneys for Federal Defendant
 UNITED STATES POSTAL SERVICE

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13 CITY AND COUNTY OF SAN
 14 FRANCISCO, CENTRAL CITY SRO
 COLLABORATIVE, SAN FRANCISCO
 15 TENANTS UNION, and HOUSING
 RIGHTS COMMITTEE OF SAN
 16 FRANCISCO

17 Plaintiffs,

18 vs.

19 UNITED STATES POSTAL SERVICE,

20 Defendant.

Case No. 09-1964 RS

**DEFENDANT’S OPPOSITION TO
 PLAINTIFFS’ MOTION FOR
 PROTECTIVE ORDER**

Date: May 3, 2011

Time: 9:00 a.m.

Dept: Courtroom E, 15th Floor

Judge: Honorable Elizabeth D. Laporte

TABLE OF CONTENTS

1

2 I. INTRODUCTION3

3 II. RELEVANT BACKGROUND6

4 III. ARGUMENT8

5 A. Plaintiffs' Motion Should Be Denied Because It Was Abruptly Filed After

6 Negligible, Inadequate Meeting and Conferring With a Pending Fully

7 Briefed Motion Addressing the Same Subject Matter Already

8 Before the Court.....8

9 B. The Court Has Already Determined that Evidence of Code Enforcement Efforts Is

10 Relevant to the Subject Matter of This Litigation, Including the

11 City’s Standing.10

12 1. Inspections and Other City Responses to Conditions at SRO Hotels Are

13 Probative of CCSF’s Claim That Is Has Been Forced Due to Mail

14 Delivery Problems to Provide an Economic Safety Net “Time and

15 Time Again.”12

16 2. Inspections and Other City Responses to Conditions at SRO Hotels Are

17 Probative of CCSF’s Claim It Is Unable to Enforce its Laws

18 Because of the Mode of Mail Delivery to SRO Hotels.13

19 3. Inspections and Other City Responses to Complaints Are Probative of

20 CCSF’s Claim That Due to Mail Delivery Problems it Cannot

21 Communicate with City Residents.14

22 4. The City’s Provision of Programs and Services to SRO Hotels Is

23 Probative of CCSF’s Claim That SRO Hotels Are “Apartments.”15

24 C. Plaintiffs Have Made No Good Cause Showing to Impose any Limit on the Scope

25 or Type of Written Discovery Requests or Questions Posed at Deposition.....16

26 IV. CONCLUSION.....18

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TABLE OF AUTHORITIES

FEDERAL CASES

Beckman Industries, Inc. v. International Insurance Co.,
966 F.2d 470 (9th Cir. 1992)16, 17

Cipollone v. Liggett Group, Inc.,
785 F.2d 1108 (3rd Cir.1986)16

Deford v. Schmid Products Co.,
120 F.R.D. 648 (D.Md. 1987).....16, 17

Phillips v. GMC,
307 F.3d 1206 (9th Cir. 2002)16

FEDERAL RULES

Fed. R. Civ. P. 26(c)16, 17

Fed. R. Civ. P. 30(d).....18

INTRODUCTION

1
2 This motion is a further example of a recurring problem in this case: the City and County
3 of San Francisco and other plaintiffs allege a set of facts and contentions but they will not
4 voluntarily allow discovery into those same facts and contentions. The latest manifestation of
5 this problem is this motion seeking a protective order preventing the Postal Service from asking
6 questions in depositions or obtaining written discovery about "SRO Horror Stories," a phrase
7 plaintiffs coined on March 28, 2011 for the first time, a phrase they have conjured using a
8 definition they have constructed unilaterally. After publicizing their allegations about SRO
9 occupants for the past two years, the City and other plaintiffs now seek to block discovery into
10 those same allegations.
11

12 This motion follows on the heels of the City and other plaintiffs' refusal to divulge the
13 information they had when they made the decision to file this litigation. At no time has any
14 plaintiff confirmed they undertook any due diligence to justify their allegation that all apartment
15 tenants in San Francisco but no SRO hotel occupants in San Francisco receive mail delivery to
16 individual mailboxes. As the Postal Service has had to point out to plaintiffs, their complaint is
17 factually erroneous, and if they had bothered to check the facts of mail delivery plaintiffs would
18 have learned before filing this litigation that their premise of discriminatory treatment is simply
19 wrong. What the City and other plaintiffs knew about their allegations, and when they knew that
20 information, is highly relevant to the outcome of this litigation. This motion is another attempt
21 to have the Court's orders provide cover for plaintiffs' decision to launch this costly litigation.
22
23

24 The Postal Service requests an order denying this motion for several reasons. First,
25 plaintiffs' position that the Postal Service cannot discover facts directly related to plaintiffs' own
26 allegations is untenable. The City cannot argue to the Court, as it did in 2009 when it opposed
27
28

1 the motion to dismiss, that its complaint should not be dismissed because of the harm it allegedly
2 suffered as a result of the mode of mail delivery provided to SRO hotels and then refuse to
3 produce *any* evidence, through document requests, interrogatories or deposition, of one iota of
4 harm the City has suffered. The Court already instructed the parties that the Postal Service could
5 conduct discovery in this area, to attack plaintiffs' unsubstantiated standing allegations, and place
6 into context what a trifling factor non-centralized mail delivery is to the host of issues SRO
7 hotels and its occupants face. Plaintiffs rejected the Postal Service's request that they withdraw
8 this motion after hearing the Court's instructions on the subject.
9

10 Second, plaintiffs' motion should be denied because it was brought without meeting and
11 conferring, in violation of the local rules and in direct contravention of the collaborative process
12 the Court has repeatedly indicated it expects the parties to undertake. Plaintiffs never even
13 identified the discovery requests it deemed improper prior to filing this motion. Instead, on the
14 day before they filed their motion, plaintiffs informed the Postal Service in broad vague terms
15 that it wanted to talk about defendant's discovery of "horror stories," and then unilaterally
16 deemed the parties at impasse and filed their motion the following day.
17

18 Third, even when considered in a vacuum outside of the context of the Court's prior
19 instructions, plaintiffs' motion falls well short of the good cause showing plaintiffs must make to
20 obtain a protective order. Plaintiffs make no showing of burden. And mislabeling the Postal
21 Service's effort to discover the facts in support of plaintiffs' own allegations as "horror stories,"
22 does not make the defendant's discovery efforts "harassing." There is nothing offensive about
23 asking employees of the City how it has been harmed and what sorts of problems exist at SRO
24 hotels independent of the mode of delivery of mail to those buildings. What is offensive is the
25 waste of public resources caused by plaintiffs' specious allegations, and the City going into
26
27
28

1 hibernation when the Postal Service seeks to discover what facts, if any, exist to support the
2 continuation of this lawsuit.

3 The motion is ill-advised and should be denied.

4 **II. RELEVANT BACKGROUND**

5 Defendant and its counsel took seriously the Court's overriding message from the first
6 motion to compel filed by the City heard in February that the parties should share information
7 about what types of information exist, how it is maintained, and what makes sense for
8 production. Since that time, Defendant and its counsel have been bending over backwards to
9 meet that standard as evidenced by the hundreds of labor hours spent by the Postal Service and
10 its counsel investigating and responding to the Plaintiffs' discovery requests. The Plaintiffs have
11 not reciprocated.
12

13 Despite this, Defendant has made extensive efforts to work with Plaintiffs to streamline
14 discovery. Defendant propounded its first set of document requests and interrogatories back in
15 2010. Many of these requests were based on the Complaint allegations, including, but not limited
16 to, for example, document request numbers 6, 11 and 13 to the City. Defendant propounded
17 subsequent discovery requests further geared toward the Complaint allegations and standing
18 issues raised by the City. At no time during this litigation has the City shared information with
19 the Postal Service about the scope or details of responsive information that exists, how it is
20 maintained, or what is burdensome about producing the information requested. Declaration of
21 Victoria R. Carradero in Support of Defendant's Opposition to Plaintiffs' Motion for a Protective
22 order, ("Carradero Decl.,"). ¶ 3. Indeed, much information discovered to date has been
23 discovered by the efforts of the Postal Service and/or its counsel, and not from any information
24 sharing of any kind from the City. *Id.* Of great concern is that the City has failed to identify the
25 vast majority of the information sought, either through its responses to discovery requests or
26
27
28

1 during the meet and confer process. Rather, Defendant's counsel has had to constantly notify the
2 City about the directly responsive information the *Postal Service* is aware exists in the City's
3 possession, custody or control, rather than the other way around. *Id.*; *see also* Docket Entry 94
4 (Lee Declaration in Support of Motion to Compel Further Responses to Interrogatories and
5 Document Requests). The discovery process has been further obstructed by the City, who was
6 involved with the discovery for months - and knows the types of responsive information it has,
7 how it is maintained, and how it can be produced - but who has withdrawn from the process,
8 relying on brand new counsel Covington and Burling and adding a buffer (and in reality, another
9 barrier), to Defendant's efforts to obtain the information the Court has encouraged the parties to
10 share.
11

12 Importantly, at no time during the meet and confer sessions did the Plaintiffs raise any
13 concern about any of the written discovery requests they now base the motion for a protective
14 order upon. Carradero Decl., ¶ 4. Indeed, the Plaintiffs never even met and conferred with
15 Defendant on any of the underlying written discovery requests, raising only to Defendant
16 purported vague concerns about deposition questions about conditions at SRO hotels. *Id.*,
17 These purported concerns were raised for the first and only time on March 28, 2011 – the day
18 before the motion was filed - when counsel for the parties met at Covington's office for an in
19 person meet and confer session having nothing to do with any aspect of the underlying motion,
20 but rather to discuss concerns that each side had with the other's responses to the first round of
21 written discovery. *Id.*
22

23 Notably, during this meeting, Covington counsel stated that she wanted to “start the
24 discussion” about what she termed “horror stories.” Carradero Decl., ¶ 4. In a meeting that
25 lasted several hours, counsel spent approximately five minutes, if that, on this purported new
26
27
28

1 found concern and repeated again that she “just wanted to start the conversation.” *Id.*
2 Surprisingly, the following day on March 29, 2011, at approximately 12:18 p.m., Covington
3 counsel sent a letter demanding, within less than five hours of time, an immediate agreement not
4 to ask any deposition questions into conditions at SRO hotels and related issues. *Id.*, ¶ 5.
5 Plaintiffs filed the motion the same day.

6 At no time have the Plaintiffs articulated any undue burden for any of the requested
7 discovery. Carradero Decl., ¶ 6. (Nor can the plaintiffs credibly claim undue burden when at
8 least some of this information is made available to the public). *See* Docket Entry Nos., 80-82,
9 101-102, Briefing on Defendant’s first motion to compel. In fact, even now, as to the
10 Department of Public Health information sought by Defendant’s first motion to compel heard on
11 April 5th, the Plaintiffs have been unable to articulate any burden in producing this information,
12 notifying Defendant as of the date of this filing that the City is still “ascertaining DPH’s ability
13 to provide this information” and “will keep [Defendant] posted.” *Id.* Finally, at no time during
14 any meet and confer session did the Plaintiffs articulate any explanation of how the discovery
15 sought is harassing or causes prejudice or harm. *Id.*

18 **III. ARGUMENT**

19 **A. Plaintiffs' Motion Should Be Denied Because It Was Abruptly Filed After** 20 **Negligible, Inadequate Meeting and Conferring With a Pending Fully** 21 **Briefed Motion Addressing the Same Subject Matter Already Before the** 22 **Court.**

23 Plaintiffs failed to meet and confer in compliance with this Court's rules before filing this
24 motion, and it should be denied on that ground alone. Moreover, the City and other plaintiffs
25 have not acted consistently with the Court's guidance on discovery in this case, namely that the
26 parties as two public entities should provide access to information, rather than seek to block
27 discovery with motion practice.

1 All meet and confer efforts by plaintiffs before the filing of this motion occurred within a
2 span of roughly 24 hours, as set forth above in Section II.

3 Moreover, this motion is an unauthorized attempt at a second bite of the discovery apple.
4 At no time did plaintiffs mention in their meet and confer communications that they would be
5 seeking a protective order against pending written discovery already subject to the Postal
6 Service's first motion to compel, which sought an order regarding requests for production and
7 interrogatories, and was heard on April 5, 2011. At the time of the filing of this motion, the
8 Postal Service's motion to compel answers to those same requests for production and
9 interrogatories was fully briefed and pending oral argument. Plaintiffs concede in footnote one
10 of their moving papers that its present motion for a protective order covers the same ground
11 already briefed in connection with the Postal Service's first motion to compel.
12

13 Finally, after this motion was filed, the Postal Service proposed a compromise of this and
14 all pending motions to plaintiffs. At the time of this filing, there has been no response. Green
15 Decl., ¶¶3-5.
16

17 **B. The Court Has Already Determined that Evidence of Code Enforcement**
18 **Efforts Is Relevant to the Subject Matter of This Litigation, Including the**
19 **City's Standing.**

20 Plaintiffs contend that evidence of code enforcement, complaints, and inspections is
21 irrelevant and unlikely to lead to discoverable information and would be unduly burdensome to
22 collect. Motion at p. 8. Specifically, Plaintiffs allege that the information sought by Defendants
23 "does not make the City's theory about single-point mail delivery more probable or less probable
24 than it would be without the evidence." *Id.* As this Court has noted, it is the City that has made
25 these exact issues relevant through its assertion of standing. April 5, 2011 Hearing Transcript
26 ("HT") at p. 19 ("...defendant is right, that the plaintiffs have put in play through their standing
27 arguments" the issue of complaints). Plaintiff, of course, had no problem touting the importance
28

1 of the City's ability to safeguard public health and enforce its health and safety laws when its
 2 standing was challenged by motion to dismiss. Plaintiffs argued:

3 Because of the Postal Service's refusal to deliver the mail into individual
 4 mailboxes at SROs, the City must provide additional financial support and
 5 costly services to SRO residents. Compl. ¶¶9a, 9b & 19. These actual, concrete
 6 financial costs are particular to it alone. The City is also injured by its
 7 diminished ability to carry out some of its key government functions, such as
 8 safeguarding public health, enforcing health and safety laws, and engaging in
 9 government speech about important civic matters. Compl. ¶¶9, 9c-e.

10 Plaintiffs' Opposition to Motion to Dismiss Complaint (Docket Entry No. 19) at p. 6.

11 Plaintiffs' prior position regarding code enforcement, when it was convenient and
 12 necessary for plaintiffs at the motion to dismiss stage, belies its argument now that code
 13 enforcement is only relevant as it relates to the mail delivery system. This is plainly wrong, as
 14 the Court noted repeatedly at the April 5 hearing in addressing plaintiffs' standing allegations.
 15 As this Court observed, it is imperative to look beyond mail related complaints so that the
 16 relative harm being caused by mail in comparison to other pressing issues facing SRO's could be
 17 determined.¹

18 Plaintiffs allege repeatedly in the Complaint that mail delivery has caused the City a
 19 panoply of harms. As just a few examples, Plaintiffs allege the Postal Service has "impeded the
 20 City's ability to treat and prevent the spread of disease...and carry out other necessary
 21 government services," Complaint ¶4; "placed all San Francisco residents at increased risk of the
 22 spread of infectious disease," Complaint ¶9d; "hampered" the City's ability to prevent "unsafe or
 23 unsanitary conditions" at SRO hotels, Complaint ¶9e; and caused "increased expense" to the
 24 Department of Public Health and the City, Complaint ¶9c. "Time and time again," plaintiffs

25
 26 ¹ Alternatively, if this case is truly limited to mail delivery problems only, as plaintiffs
 27 now argue, then because the Court has no jurisdiction over mail delivery problems, the matter
 28 (continued on next page)

1 allege, "the City has been forced to provide an economic safety net that would have been
 2 unnecessary had the U.S. Postal Service delivered mail to low-income SRO apartment building
 3 residents the same way it does to their economically better-off neighbors." Complaint ¶4. The
 4 City repeated these allegations in numerous court documents and trumpeted these allegations in
 5 press releases. Docket Entry Nos., 94, 95, 98, Ex. 2. The City cannot on the one hand level
 6 accusations that the method of mail delivery has interfered with the City's ability to manage the
 7 "unsanitary and unsafe" conditions at these hotels and has placed all San Franciscans at risk of
 8 disease (Complaint, ¶¶ 4, 9), and then deny the Postal Service discovery into those very
 9 allegations. As this Court noted, Defendants are "entitled to test whether [Plaintiffs] have proved
 10 the harm or not." HT at p. 20. Plaintiffs do not get a "one-way street" where they can pick and
 11 choose what helps them but then prevent Defendants from exploring those same areas. *Id.*

12
 13 **1. Inspections and Other City Responses to Conditions at SRO Hotels
 14 Are Probative of CCSF's Claim That It Has Been Forced Due to Mail
 15 Delivery Problems to Provide an Economic Safety Net "Time and
 16 Time Again."**

16 Plaintiffs' contend that the mail delivery system has caused the City financial harm.
 17 Indeed, the City rested its standing in this lawsuit on the alleged financial harm it claims to have
 18 suffered. Specifically, in response to the Postal Service's motion to dismiss the City for lack of
 19 standing, plaintiffs argued: "Because of the Postal Service's refusal to deliver the mail into
 20 individual mailboxes at SROs, the City must provide additional financial support and costly
 21 services to SRO residents. These actual, concrete financial costs are particular to it alone."
 22 Plaintiffs' Opposition to Motion to Dismiss Complaint (Docket Entry No. 19) at p. 6. Plaintiffs
 23
 24

25 (footnote continued from previous page)
 26 should be dismissed and plaintiffs should file their mail delivery complaints before the Postal
 27 Regulatory Commission.
 28

1 contend that it is due to the mail delivery system that they have become a financial safety net for
2 the SRO hotels, yet provide no evidence, or even context, for the financial support they are
3 providing. Inspections and city responses to conditions at SRO hotels would provide such
4 context. This information is probative as it indicates what percentage of this financial safety net
5 is actually a result of the mail delivery system and what is a result of poor conditions of the SRO
6 hotels that the City has been unable to remedy.

7
8 Because Plaintiffs have alleged this type of harm in order to gain standing they have
9 injected this issue into the lawsuit and Defendants should be allowed to inquire into whether it
10 really is the mail delivery system that is causing the alleged harm. As this Court noted “[i]f, for
11 example, there was just so much infectious disease going on and the Health Department was
12 turning a blind eye to it for the most part and one or two letters got misdelivered, that would be
13 different than if they were really doing a top notch job of preventing infectious diseases in this
14 population at these places and, you know, those efforts are being hampered.” HT at p. 18. The
15 harm alleged by Plaintiffs, therefore, must be placed in context. If the City is spending a
16 significant amount of money on SRO hotel problems each year but only a small portion or none
17 of it is due to mail delivery issues, then that information is relevant to whether the City has
18 suffered harm as a result of the mail delivery system. The requested documents are therefore
19 highly relevant as to the issue of standing in this case.
20

21 **2. Inspections and Other City Responses to Conditions at SRO Hotels Are**
22 **Probative of CCSF’s Claim It Is Unable to Enforce its Laws Because of the**
23 **Mode of Mail Delivery to SRO Hotels.**

24 The City alleges that it has suffered injury from the mail delivery system as it has
25 diminished its ability to enforce health and safety laws. Plaintiffs' Complaint, ¶¶ 4 and 9;
26 Plaintiffs' Opposition to Motion to Dismiss (Docket Entry No. 19), p. 6. Inspections and the
27 City’s response to complaints are highly probative of whether this is an actual harm caused by
28

1 the mail delivery system. This type of evidence is necessary in order to provide context to the
2 alleged harm. As this Court noted “if there was evidence that the city is already -- that other
3 things are far more hampering to the point where this really doesn't make any difference, or the
4 city doesn't carry out its responsibilities, for example, and never inspects, or when it inspects, it
5 finds a ton of violations and doesn't try to cure them. If it were that kind of information, they are
6 entitled to see whether that exists.” HT at p. 3.

7
8 In addition, the discovery is relevant to whether the City should be doing more to enforce
9 its laws. The City complains that mail is sometimes stolen at the SRO hotels, including by SRO
10 hotel employees. The City has a police department to investigate theft and a District Attorney's
11 Office to prosecute it. Likewise the City has a Department of Building Inspection to find
12 violations of building codes such as a front door that doesn't lock, a Department of Public Health
13 to eradicate health and sanitary problems, and a SRO Task Force to address problems with SRO
14 employees retaliating against occupants. These various City departments and resources enable
15 the City to effectively communicate with its residents, carry out its governance functions, and
16 ensure public health and safety at SROs -- all of which the City and other plaintiffs allege in the
17 complaint is to the contrary.

18
19 Thus, Defendants are entitled to this information to determine what effect if any the mail
20 delivery system has had on the City's ability to enforce its laws.

21 **3. Inspections and Other City Responses to Complaints Are Probative of**
22 **CCSF's Claim That Due to Mail Delivery Problems it Cannot Communicate**
23 **with City Residents.**

24 Evidence of inspections and other city responses to complaints is also probative of any
25 issues the City may have with communicating with city residents. The City has inspection power
26 through a variety of City departments, including the Fire Department, Public Health Department
27 and Building Inspection Department. When the City inspects a SRO hotel, it is in contact with
28

1 someone at the property, including occupants. Whether the City has inspected SRO hotels, how
2 often it did so, and what steps it took to communicate with SRO hotel occupants is not only
3 directly relevant to the allegations in the complaint, it is not burdensome or harassing for the City
4 to provide in discovery. Rather than trying to block the disclosure of this information through
5 the hasty preparation and filing of this motion, the City and other plaintiffs should have been
6 devoting the energy it took to file this motion toward providing the information, as the Court has
7 repeatedly urged the City and plaintiffs to do.
8

9 The evidence is also helpful as context. The City and other plaintiffs' view is that they
10 can allege a set of facts giving rise to constitutional theories and then limit any and all inquiry
11 into their allegations to a discrete area of activity, namely problems with mail delivery. If the
12 evidence shows that the City's inspectors visited a SRO hotel 10 times during the two years
13 before the complaint was filed and found a total of 50 code violations for a variety of problems
14 including bed bug infestations, inoperable elevators, unsanitary conditions allowing disease to
15 spread, and lack of a locking front door, but this same set of inspections did not yield any
16 information or citation having to do with lost or stolen mail, then that evidence would be
17 probative of whether there was any mail problem, or any harm caused by a mail problem,
18 including plaintiffs' counsel's formulation of "incremental harm." At this point, the City's
19 position is that it does not have to give up *any* evidence to substantiate its allegations of harm.
20

21 Because the requested discovery is probative of whether the City has suffered any harm
22 to communication as a result of the mail delivery system, and sufficient harm to cause the
23 damages alleged to support plaintiffs' standing arguments, the motion must be denied.
24

25 **4. The City's Provision of Programs and Services to SRO Hotels Is**
26 **Probative of CCSF's Claim That SRO Hotels Are "Apartments."**
27
28

1 Plaintiffs contend that USPS is required to provide individual mail delivery to SRO
2 residents because SRO hotels qualify as apartment houses under USPS regulations. Complaint, ¶
3 30.

4 The City's provision of programs and services to SRO hotels is probative of this issue.
5 Evidence of the programs and services provided by the City to SRO hotels will provide
6 information on such things as SRO hotel visitor policies and surveys of the properties. The
7 Postal Service contends that this information will show that SRO hotels are not like apartments
8 at all, and even that the City classifies SRO hotels as something different than apartment
9 buildings. This type of information goes directly to whether SRO hotels are or can be
10 characterized as apartment houses. It will also show to what extent the City, which accuses the
11 Postal Service of improperly classifying SRO hotels as something other than apartment
12 buildings, does the very thing they allege is unconstitutional. Because Plaintiffs have raised the
13 classification of SRO hotels as an issue, evidence of characteristics that classify SRO hotels as
14 either apartments, hotels, or anything else, is highly probative.
15
16

17 **C. Plaintiffs Have Made No Good Cause Showing to Impose any Limit on the**
18 **Scope or Type of Written Discovery Requests or Questions Posed at**
19 **Deposition.**

20 Plaintiffs fail to make a good cause showing that would warrant the Court to impose a
21 limit on the scope or type of questions posed at deposition. Federal Rule of Civil Procedure
22 26(c) permits "[a] party or any person from whom discovery is sought [to] move for a protective
23 order in the court where the action is pending. . . ." FED. R. CIV. PRO. 26(c). "The court may,
24 for good cause, issue an order to protect a party or person from annoyance, embarrassment,
25 oppression, or undue burden or expense" *Id.* (emphasis added). The boundaries of Rule
26 26(c), however, are not limitless. "A party asserting good cause bears the burden, for each
27 particular document it seeks to protect, of showing that specific prejudice or harm will result if
28

1 no protective order is granted." *Phillips v. GMC*, 307 F.3d 1206, 1210-11 (9th Cir. 2002).

2 "Broad allegations of harm, unsubstantiated by specific examples or articulated reasoning, do not
3 satisfy the Rule 26(c) test." *Beckman Industries, Inc. v. International Ins. Co.*, 966 F.2d 470, 476
4 (9th Cir. 1992) (quoting *Cipollone v. Liggett Group, Inc.*, 785 F.2d 1108, 1121) (3rd Cir.1986));
5 *see also Deford v. Schmid Prods. Co.*, 120 F.R.D. 648, 653 (D.Md. 1987) (requiring party
6 requesting a protective order to provide "specific demonstrations of fact, supported where
7 possible by affidavits and concrete examples, rather than broad, conclusory allegations of
8 potential harm").

9
10 Plaintiffs' motion fails to meet their burden. Though Plaintiffs have submitted over one-
11 hundred pages of documents in connection with their motion, their motion is silent as to what
12 within these documents is "harassing" or "burdensome." For example, in Exhibit K, plaintiffs
13 submit fifty-six pages of Jeffrey Buckley's deposition testimony. Without further explanation, as
14 required by the Ninth Circuit, plaintiffs seem to be objecting to the entire deposition, and
15 defendant is left with no better understanding of the harassment allegations made against it. *See*
16 *Beckman Industries, Inc. v. International Ins. Co.*, 966 F.2d 470, 476 (9th Cir. 1992). Plaintiffs
17 simply provide the defendant, and the Court, with a mountain of documents that both must weed
18 through, and then speculate about, in order to guess what elements of defendant's inquiries
19 plaintiffs find troublesome. The Ninth Circuit has interpreted Rule 26(c) to require more
20 specificity than plaintiffs have provided.

21
22 Even more troubling is plaintiffs' failure to demonstrate why they believe these inquiries
23 are problematic. Plaintiffs make sweeping allegations that defendant's deposition questions,
24 interrogatories, and requests for documents constitute harassment of both plaintiffs and their
25 witnesses, and that such inquiries impose an undue burden on the plaintiffs. *See generally*
26
27
28

1 Plaintiffs' Motion for Protective Order Regarding the Postal Service's Deposition and Document
2 Discovery Concerning "SRO Horror Stories." But plaintiffs do not provide an explanation of
3 what specific harm or prejudice will occur if no protective order is in place; instead, plaintiffs
4 keep circling back to the far-reaching theme that they are being harassed by the defendant
5 because defendant seeks information the City now conveniently contends is irrelevant to its case,
6 two years after touting the importance of the City's ability to enforce its health, safety and other
7 codes. *See, e.g. Beckman Industries, Inc. v. International Ins. Co.*, 966 F.2d 470, 476 (9th Cir.
8 1992). Conclusory allegations of this type have consistently failed to withstand the courts'
9 scrutiny. *See id.; Deford v. Schmid Prods. Co.*, 120 F.R.D. 648, 653 (D.Md. 1987).

11 Defendant is not harassing plaintiffs by choosing to ask detailed questions that go to the
12 heart of plaintiffs' allegations. During recent depositions, defendant questioned city employees,
13 whose job responsibilities include enforcing the health and safety codes of buildings within the
14 City and County of San Francisco, including SRO hotels, about the health and safety of those
15 buildings. The questioning was directly related to plaintiffs' allegations concerning the Postal
16 Service's alleged responsibility for health and sanitation issues at SRO hotels.

18 Finally, an additional layer of scrutiny into defendant's discovery practices is
19 unnecessary, as defendant's power to gather information during depositions is already limited by
20 Federal Rule of Civil Procedure 30(d). While Rule 30(d) indeed places a durational limitation of
21 one seven-hour day on a party per deposition, the rule does not impose on a party any
22 requirement as to how that party should partition its time. For the court to become immersed in
23 this type of exercise would result in an unmanageable standard, necessitating case-by-case
24 inspection and taxing the court's limited resources. Plaintiffs offer no insight into how the Court
25 would police this process. There is no reason why the court should become involved in placing
26
27
28

1 limits on advocates in this fashion. Although plaintiffs may not like having their witnesses have
2 to answer questions pertaining directly to their own far reaching allegations, and may even feel it
3 is a poor use of the defendants' limited deposition time, the Court should not have to weigh into
4 this matter where the seven hour limit already places a sufficient limit on the parties.

5 **IV. CONCLUSION**

6 The City and other plaintiffs have taken inconsistent positions about the scope of this
7 lawsuit. In 2009, when they filed the complaint and argued against the motion to dismiss, the
8 City and other plaintiffs strenuously argued that the facts alleged in the complaint created a basis
9 for standing on the part of the City. Those allegations centered around several distinct theories
10 of harm to the City: an inability to communicate on important civic matters, an inability to
11 detect and prevent the spread of infectious diseases and other health and safety problems, and an
12 inability to enforce the laws of the City. These are the allegations of the complaint prepared and
13 filed by the City and other plaintiffs. Discovery into those allegations will necessarily involve
14 the deposition questions about whether there are health and safety code violations at SRO hotels,
15 such as for bed bugs or infectious diseases, whether there are City inspections for any and all
16 code violations and other City communications undertaken directly to SRO hotel occupants,
17 whether there are code violations prosecuted against SRO hotel owners, and whether the City
18 provides any economic safety net for SRO occupants. For the foregoing reasons, Defendant
19 requests that the Court deny Plaintiffs' Motion for Protective Order.
20
21

22 Respectfully submitted,

23 MELINDA HAAG
24 United States Attorney

25 Dated: April 12, 2011

26 _____ /s/
27 JONATHAN U. LEE
28 THOMAS R. GREEN
VICTORIA R. CARRADERO

Assistant United States Attorneys
Attorneys for the United States Postal
Service

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28