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Attorneys for Respondent, City of Los Angeles

No Fee ~ Gov't Code § 6103

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

Fix the City, Inc., a California Nonprofit
Corporation,

Petitioner,

vs.

City of Los Angeles, a Municipal
Corporation; The City of Los Angeles
City Council; and Does 1 through 10,
inclusive,

Respondent.

Case No.: 23STCP04410

Honorable James C. Chalfant
Department 85

Volume 2 of 3 (CX 59 – 68)

**Declaration of Robert Mahlowitz in Support
of the City of Los Angeles' Opening Trial
Brief**

Date: November 14, 2024
Dept. 85
9:30 a.m.

Respondents City of Los Angeles and City Council of Los Angeles submit the
following Volume 2 of 3 to the Declaration of Robert Mahlowitz, CX Exhibits 59 to 68 to
that Declaration.

Dated: October 7, 2024

Hydee Feldstein Soto, City Attorney
Valerie Flores, Chief Dep. City Attorney
John W. Heath, Sr. Asst. City Attorney

By: _____


Robert M. Mahlowitz, Deputy City Attorney
Attorney for Respondent, CITY OF LOS ANGELES

RMM Decl.
Exhibit 59

RMM Decl.
Exhibit 59

HOLLY L. WOLCOTT
CITY CLERK

City of Los Angeles
CALIFORNIA

OFFICE OF THE
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER



KAREN BASS
MAYOR

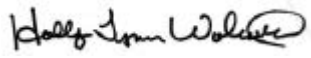
Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213) 978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.GOV

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 20-0841-S40
Council Meeting Date: December 12, 2023
Agenda Item No.: 41
Agenda Description: EXEMPTION and HOUSING AND HOMELESSNESS COMMITTEE REPORT relative to COVID-19 Homelessness Roadmap, Twenty First Report.
Council Action: HOUSING AND HOMELESSNESS COMMITTEE REPORT - ADOPTED FORTHWITH
Council Vote:

YES	Blumenfield	YES	de León	YES	Harris-Dawson
YES	Hernandez	YES	Hutt	YES	Krekorian
YES	Lee	YES	McOsker	YES	Padilla
ABSENT	Park	ABSENT	Price Jr.	YES	Raman
YES	Rodriguez	YES	Soto-Martínez	YES	Yaroslavsky


HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 341

FILE SENT TO MAYOR
LAST DAY FOR MAYOR TO ACT

12-14-2023

12/26/2023

APPROVED



12/21/2023

DATE SIGNED

HOUSING AND HOMELESSNESS COMMITTEE REPORT relative to COVID-19 Homelessness Roadmap, Twenty First Report.

Recommendations for Council action, SUBJECT TO APPROVAL OF THE MAYOR:

1. APPROVE the recommendations as stated in the City Administrative Officer (CAO) report dated December 1, 2023, attached to the Council file, with the following amendments:

- a. Amend the language for Recommendation 20 as follows:

AUTHORIZE the lease extension of the LA Grand Hotel in Council District 14 with 481 beds, to July 31, 2024, with expenditure authority through October 31, 2024; and, INSTRUCT the CAO, LAHD and REQUEST Mayor, LAHSA, Housing Authority of City of Los Angeles, and other needed departments, to report to Council at each Housing and Homelessness Committee meeting on the demobilization plan that ensures all residents continue on their housing solution path. The demobilization needs to use available beds throughout the Continuum of Care, inside and outside the City.

- b. Amend the language for Recommendation 21 as follows:

APPROVE and RATIFY the existing Emergency Occupancy Agreement (Contract Number C-135551) by and between Shen Zhen New World I, LLC, and the City of Los Angeles, as amended (the "LA Grand Occupancy Agreement"):

- a. For the use of the LA Grand Hotel pursuant to the terms set forth in the LA Grand Occupancy Agreement.
- b. Authorize the General Services Department (GSD) to negotiate and execute either an amendment to the LA Grand Occupancy Agreement with Shen Zhen New World I, LLC for the use of the LA Grand Hotel for interim shelter purposes under the terms and conditions substantially outlined in the attached term sheet.
- c. City shall seek to include in the LA Grand lease extension a labor harmony provision that requires the Owner to:
 - i. Sign a Labor Peace Agreement (LPA) with any labor organization representing or seeking to represent hotel workers at the hotel during the term of the lease.
 - ii. Submit to the City a document whereby the Owner and the labor organization attest to the execution of the LPA, including that the LPA contains a provision that prohibits the labor organization and its members from engaging in picketing, work stoppages, boycotts or other economic interference at the LA Grand for the duration of the City's lease.

2. DETERMINE that the Interim Housing Project at 406 North Bonnie Brae Street and 413 Burlington Avenue, which allows for funding allocation, construction, lease or similar agreement, and operation, for approximately up to three years; is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21080.27, applicable to City of Los Angeles emergency homeless shelters; and Public Resources Code Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, as also reflected in State CEQA Guidelines, Section 15269(c).
3. DETERMINE that the leases and continued use of the Crisis and Bridge Housing facilities at 1818 South Manhattan Place, 668 South Hoover Street, and 11471 Chandler Boulevard are statutorily exempt from CEQA under Public Resources Code Section 21080.27 applicable to City of Los Angeles emergency homeless shelters, and under Public Resources Code Section 21080(b)(4) as specific actions necessary to prevent or mitigate an emergency as also reflected in State CEQA Guidelines Section 15269(c). Please refer to Notice of Exemptions found in the Bureau of Engineering (BOE) report dated December 1, 2023, attached to the Council file.

Fiscal Impact Statement: The CAO reports that there is no additional General Fund impact as a result of the recommendations in said CAO report. The recommendations in this report utilize budgeted City's General Funds previously approved for homelessness interventions. Additionally, the recommendations also utilize the Emergency Solutions Grant CARES Act (ESG-CV) funds and Homeless Housing, Assistance, and Prevention funds for homelessness interventions.

Financial Policies Statement: The recommendations in said CAO report comply with the City Financial Policies in that budgeted funds are being used to fund recommended actions.

Community Impact Statement: None submitted

SUMMARY

At the meeting held on December 6, 2023, your Housing and Homelessness Committee considered a CAO and BOE reports relative to COVID-19 Homelessness Roadmap, Twenty First Report.

After an opportunity for public comment was held, the Committee moved to approve the recommendations as amended, as detailed above. This matter is now forwarded to the Council for its consideration.

Respectfully Submitted,

HOUSING AND HOMELESSNESS COMMITTEE

<u>MEMBER</u>	<u>VOTE</u>
RAMAN	YES
BLUMENFIELD	YES
HARRIS-DAWSON	YES
RODRIGUEZ	YES
LEE	YES

JL 20-0841-S40 2023

-NOT OFFICIAL UNTIL COUNCIL ACTS-

REPORT FROM

OFFICE OF THE CITY ADMINISTRATIVE OFFICER

Date: December 1, 2023

CAO File No. 0220-05151-0497
Council File No. 20-0841, 23-1021
Council District: 2, 3, 4, 5, 6, 9, 10,
13, 14

To: The City Council

From: Matthew W. Szabo, City Administrative Officer



Reference: COVID-19 Homelessness Roadmap

Subject: **TWENTY FIRST REPORT: COVID-19 HOMELESSNESS ROADMAP FUNDING
RECOMMENDATIONS**

SUMMARY

On September 9, 2020, the City Council approved funding for the initial projects under the COVID-19 Homelessness Roadmap (Roadmap) and directed this office to submit future funding recommendations through reports. This is the twenty-first such report.

First, this report provides exemption determinations for the California Environmental Quality Act (CEQA) for several projects, including renewal, and technical amendments to prior Roadmap recommendations. Additionally, this report recommends authorizing the General Services Department to execute new or amend existing agreements with various entities for interdepartmental, lease, or construction agreements for various projects.

Second, this report reprograms savings from various Roadmap projects and includes funding for the cost of Furniture, Fixtures and Equipment and operations for several projects. This report also recommends approval of the Homekey 1, Howard Johnson's, also known as The Sieroty, conversion to permanent housing.

Third, this report recommends the creation of a new appropriation account for Encampment Resolution Fund - Ballona (ERF-Ballona River) funds, as well as the allocation of HHAP funds to support the continuous work in the LA River Project and Board of Public Works Hygiene Program. Also included in this report are recommendations to continue funds for 30 Time-Limited Subsidies slots and supportive services for the Self-Help And Recovery Exchange (SHARE!) Collaborative Housing in Council District 3.

Lastly, this report provides the lease and contract extensions of the LA Grand Hotel in Council District 14 through July 31, 2024 to allow a seamless transition for participants to the Mayfair Hotel.

RECOMMENDATION

That the City Council, subject to approval by the Mayor:

1. DETERMINE that the Interim Housing Project at 406 N. Bonnie Brae Street and 413 Burlington Avenue, which allows for funding allocation, construction, lease or similar agreement, and operation, for approximately up to three years, of an interim housing facility to provide temporary emergency shelter to people experiencing homelessness, is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to Public Resources Code, Section 21080.27, applicable to City of Los Angeles emergency homeless shelters; and Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, as also reflected in State CEQA Guidelines, Section 15269(c);
2. DETERMINE that the leases and continued use of the Crisis and Bridge Housing facilities at 1818 S. Manhattan Place (formerly 1819 S. Western Avenue), 668 S. Hoover Street (formerly 625 La Fayette Place), and 11471 Chandler Boulevard are statutorily exempt from CEQA under Public Resources Code Section 21080.27 applicable to City of Los Angeles emergency homeless shelters, and under Public Resources Code Section 21080(b)(4) as specific actions necessary to prevent or mitigate an emergency as also reflected in State CEQA Guidelines Section 15269(c). This determination is consistent with, and supported by, the City Council's prior actions for the development and use of the properties as shelters; and CEQA determinations made on March 22, 2019 and September 9, 2020 (C.F. Nos. 18-0392 and 20-0841, respectively);
3. AUTHORIZE the General Services Department (GSD) to execute a new or amend an existing interdepartmental agreement with the Department of Recreation and Parks and a lease agreement with the Hope the Mission (Formerly known as Hope of the Valley) for the Tiny Home Village site located at 11471 Chandler Boulevard with 75 beds in Council District 2 for one year;
4. AUTHORIZE the GSD to execute a new or amend an existing interdepartmental agreement with the Department of Recreation and Parks and a lease agreement with the 1736 Family Crisis Center for the A Bridge Home site located at 1818 S. Manhattan Pl. (formerly 1819 S. Western Ave.) with 15 beds in Council District 10 for one year;
5. AUTHORIZE the GSD to enter into a lease agreement with the Los Angeles Downtown Medical Center (LADMC) for the proposed Tiny Home Village site located at 406 North Bonnie Brae Street and 413 Burlington Avenue in Council District 13 for up to 7 years;
6. AUTHORIZE the GSD to enter into an agreement with the California Department of General Services for the construction of the proposed Tiny Home Village site located at

406 North Bonnie Brae Street and 413 Burlington Avenue in Council District 13 for up to 7 years;

7. APPROVE \$10,000 for the construction of the Tiny Home Village located at 406 North Bonnie Brae Street & 413 Burlington Avenue in Council District 13 through June 30, 2024:
 - a. APPROPRIATE \$10,000 from Homeless Housing, Assistance, and Prevention Round 3 (HHAP-3) Fund No. 65S/10, Account No. 10W741, FC-1 Interim Housing Operations and Capital Costs to the Capital Technology Improvement Expenditure Program Fund No. 100/54, in a new account entitled, " CD 13 Bonnie Brae THV" for the construction of the Tiny Home Village located at 406 North Bonnie Brae Street & 413 Burlington Avenue in Council District 13;
8. REPROGRAM \$537,240 from Homeless Effort - County Funding Agreement Fund No. 63Q/43, Account No. 43YC88, 2023-24 Bridge Home Operations to Homeless Effort - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement in unspent funds from the A Bridge Home Site located at 14333 Aetna Street in Council District 6;
9. APPROVE \$406,208 for Volunteers of America Los Angeles (VOALA) for the cost of Furniture, Fixtures and Equipment of a Tiny Home Village (THV) with 144 beds at 850 North Mission Road in Council District 14 through June 30, 2024:
 - a. APPROPRIATE \$406,208 from Homeless Effort - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to Fund No. 63Q/43, Account No. 43YC27, 2023-24 Tiny Home Village Operations for the cost of Furniture, Fixtures and Equipment of THV site at 850 North Mission Road in Council District 14 through June 30, 2024;
10. APPROVE up to \$188,024 for the operations of 30 additional beds at the A Bridge Home site located at 1214 Lodi Place through June 30, 2024;
 - a. APPROPRIATE \$188,024 from Homeless Effort - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to LAHSA Fund No. 63Q/43, Account No. 43YC88, 2023-24 Bridge Home Operations for the operations of 30 additional beds at the A Bridge Home site located at 1214 Lodi Place in Council District 13 through June 30, 2024;
11. APPROVE up to \$428,065 for the operations of the THV located at 2301 West 3rd Street in Council District 13 at double occupancy through June 30, 2024:
 - a. APPROPRIATE \$428,065 from Homeless Effort - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to Fund No. 63Q/43, Account No. 43YC27, 2023-24 Tiny Home Village Operations for the operations of the THV located at 2301 West 3rd Street in Council District 13 at double occupancy through June 30, 2024;

12. APPROVE up to \$577,060 for the operations of the THV located at 1455 Alvarado Street in Council District 13 through June 30, 2024:
 - a. APPROPRIATE \$577,060 from Homeless Effort - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to Fund No. 63Q/43, Account No. 43YC27, 2023-24 Tiny Home Village Operations for the operations of the THV located at 1455 Alvarado Street in Council District 13 through June 30, 2024;
13. REPROGRAM up to \$895,476 in saving for various Roadmap interim housing projects for the cost of operations to the Emergency Solutions Grant CARES Act (ESG-CV) Fund No. 517/43, Account No. 43VC9V, COVID-19 Homeless Roadmap from:
 - a. \$269,599 from ESG-CV Fund No. 517/43, Account No. 43TB32, Interim Housing Operations (Permanent Structure and Pallet) at the Tiny Home Villages located at 1455 Alvarado Street and 2301 West 3rd Street in Council District 13;
 - b. \$19,800 from ESG-CV Fund No. 517/43, Account No. 43WC29, 2022-23 Other Interim Housing Operations for the interim housing site located at 2521-2525 Long Beach Ave;
 - c. \$606,077 from ESG-CV Fund No. 517/43, Account No. 43TCV1, LAHSA Rapid Re-Housing and Shared Housing-CV19 from Time-Limited Subsidies;
14. APPROVE \$286,789 of ESG-CV funds for Project Homekey 1.0 construction costs shortfalls through September 30, 2023;
 - a. APPROPRIATE \$286,789 from ESG-CV Fund No. 517/43, Account No. 43VC9V, COVID-19 Homeless Roadmap to ESG-CV Fund No. 517/43, Account No. 43TA43, Homekey Rehab for rehabilitation costs relative to the Project Homekey Sites at Panorama Inn and Travelodge (Normandie);
15. RESCIND and REPLACE Recommendation 20 in the previously approved 19th COVID-19 Homelessness Roadmap Funding Report (C.F. 20-0841-S36) and replace with the following:
 - a. AUTHORIZE the expenditure authority extension of Homeless Housing, Assistance, and Prevention Program Round 2 funds previously approved (C.F. 20-1524) allocated to the Community Investment for Families Department for the Kid's First program in Council District 6 through June 30, 2024;
 - i. INSTRUCT the General Manager of the Community Investment for Families Department or their designee to amend the contract with New Economics for Women (C-144401) to reflect the new expenditure authority;
16. APPROVE the conversion to permanent housing of the Howard Johnson/The Sieroty, a Homekey1 site, located at 7432 Reseda Blvd., in Council District 4;
17. DIRECT the LAHD to work with the City Attorney and the City Administrative Officer to revise the Deed of Trust, Regulatory Agreement and Promissory Note as necessary for the

conversion of the Howard Johnson/The Sieroty to permanent housing with an affordability period of 55 years;

18. APPROVE the use of the Woodman/Arleta site located at 9120 Woodman Avenue, Los Angeles, CA 91334, in Council District 6, as a recuperative care facility for homeless seniors with chronic illnesses;
19. REQUEST that LAHSA amend its operations/services contract, and that the City Attorney amend the necessary legal documents, Deed of Trust, Regulatory Agreement and Promissory Note, with the National Health Foundation (NHF), the owner/operator of the Woodman/Arleta site, to define the site a reparative care facility serving homeless seniors, 55 years of age or older, with chronic illnesses;
20. AUTHORIZE the lease extension of the LA Grand Hotel in Council District 14 with 481 beds, to July 31, 2024, with expenditure authority through October 31, 2024;
21. APPROVE and RATIFY the existing Emergency Occupancy Agreement (Contract Number C-135551) by and between Shen Zhen New World I, LLC, and the City of Los Angeles, as amended (the "LA Grand Occupancy Agreement"):
 - a. For the use of the LA Grand Hotel pursuant to the terms set forth in the LA Grand Occupancy Agreement, and;
 - b. Authorize the General Services Department (GSD) to negotiate and execute either an amendment to the LA Grand Occupancy Agreement with Shen Zhen New World I, LLC for the use of the LA Grand Hotel for interim shelter purposes under the terms and conditions substantially outlined in the attached term sheet;
22. REPROGRAM \$794,280.23 in unspent funds of Homeless Housing, Assistance, and Prevention Program Round 1 (HHAP-1) Grant Fund No. 62Y/10, Account No. 10V174, Board of Public Works to HHAP Fund No. 62Y/10, Account No. 10S654, FC-5: Street Strategy, Outreach, Public Health, and Hygiene;
23. APPROVE \$286,270 of HHAP-1 funding and authorize the CAO to negotiate and execute a contract with People Assisting the Homeless (PATH) to complete the LA River Project associated with contract number C-141543;
 - a. APPROPRIATE \$286,270 from HHAP Fund No. 62Y/10, Account No. 10S654, FC-5: Street Strategy, Outreach, Public Health, and Hygiene to HHAP Fund No. 62Y/10, Account No. 10Y758, Encampment Resolution Fund - LA River Grant;
 - b. APPROPRIATE up to \$286,270 from HHAP Fund No. 62Y/10, Account No. 10Y758, Encampment Resolution Fund - LA River Grant to the Office of the City Administrative Officer Fund No. 100/10, Account No. 003040, Contractual Services;

24. AUTHORIZE the Controller to:

- a. Create and appropriate a new appropriation account entitled Encampment Resolution Fund - Ballona (ERF-Ballona River), Account No. TBD in the amount of \$2,428,329.755 within the newly establish special fund (C.F. 23-1021; Park-Padilla) entitled "Encampment Resolution Fund Grant- Ballona" with the Office of the City Administrative Officer (Department 10) from revenue source 3361, State Grants - Others;

25. APPROVE \$150,000 for Self-Help And Recovery Exchange (SHARE!) to continue for 30 Time-Limited Subsidies for up to 24 months in Council District 3;

- a. APPROPRIATE \$150,000 from General City Purposes - Additional Homeless Services Fund 100/56, Account No. 000931 to the Los Angeles Housing Department Fund No. 10A/43, Account No. 43VB55, CD 3 Shared Housing for 20 Time-Limited Subsidies in Council District 3;

26. APPROVE \$200,000 for SHARE! to continue supportive services and housing sustaining programs at the shared-housing sites within Council District 3;

- a. APPROPRIATE \$200,000 from General City Purposes - Additional Homeless Services Fund 100/56, Account No. 000931 to the Los Angeles Housing Department Fund No. 10A/43, Account No. 43VB55, CD 3 Shared Housing to continue supportive services and housing sustaining programs at the shared-housing sites within Council District 3;

27. AMEND and REPLACE the approved Recommendation 19.a.v relative to the 17th Homelessness Roadmap Report dated May 12, 2023 (C.F. 20-0841-S34) to read as follows:

- a. INSTRUCT the General Manager of LAHD, or their designee, to amend the City's new Roadmap Contract (C-144656) with LAHSA to:
 - i. Reappropriate unspent funding (in an up to amount of \$75,224,070) as of September 30, 2023, and continue services with expenditure authority through June 30, 2024. Funding Categories and allocations as follows:
 1. Up to \$3,065,250 in FC-5 Safe Sleep Operations

28. REPROGRAM from Homeless Housing, Assistance, and Prevention Round 3 (HHAP-3) Fund No. 65S/10, Account No. 10W742, FC-2 Skid Row Housing to HHAP-3 Fund No. 65S/10, Account No. 10W744, FC-4 Outreach, Hygiene, Prevention, and Supportive Services;

29. REPROGRAM \$1,344,145 from HHAP-3 Fund No. 65S/10, Account No. 10W746, FC-6 Administrative Costs to HHAP-3 Fund No. 65S/10, Account No. 10W744, FC-4 Outreach, Hygiene, Prevention, and Supportive Services;

30. APPROVE \$186,069 of HHAP-3 funds for the Board of Public Works Hygiene Services Skid Row - Pit Stop in Council District 14;
 - a. APPROPRIATE \$186,069 from HHAP-3 Fund No. 65S/10, Account No. 10W744, FC-4 Outreach, Hygiene, Prevention, and Supportive Services to the Board of Public Works, Fund No. 100/74, Account No. 003040, Contractual Services to fill the projected shortfall for the Skid Row Hygiene Program;
31. APPROVE \$1,344,145 of HHAP-3 funds for Board of Public Works Citywide Pit Stop Program;
 - a. APPROPRIATE \$1,344,145 from HHAP-3 Fund No. 65S/10, Account No. 10W744, FC-4 Outreach, Hygiene, Prevention, and Supportive Services to the Board of Public Works, Fund No. 100/74, Account No. 003040, Contractual Services to fill the projected shortfall for the Skid Row Hygiene Program;
32. REQUEST LAHSA to conduct a Request for Proposals, or other qualifying competitive process, to identify a qualified service provider in relation to the interim housing site located at 2377 Midvale Avenue with 33 beds in Council District 5;
33. INSTRUCT the General Manager of LAHD, or their designee, to amend the City's General Fund contract (C-140706) with LAHSA to:
 - a. Add \$150,000 for SHARE! Time Limited Subsidies in Council District 3 through June 30, 2024
 - b. Extend the term of the SHARE! Shared Housing Program in Council District 3 through June 30, 2024
 - i. Add \$200,000 for the SHARE! Shared Housing Program in Council District 3 through June 30, 2024
34. INSTRUCT the General Manager of LAHD, or their designee, to amend the City's HHAP (C-135650) contract with LAHSA to:
 - a. Reflect the service funding reduction approved relative to the 20th Roadmap report dated October 13, 2023 (C.F. 20-0841-S37)
 - i. \$2,257,038 from LAHSA PRK Housing Navigation Services
35. INSTRUCT the General Manager of LAHD, or their designee, to amend the City's new Roadmap Contract (C-144656) with LAHSA to:
 - a. Reflect the service funding allocations/amendments in this report for:
 - i. ABH 14333 Aetna Street
 - ii. THV 850 North Mission
 - iii. ABH 1214 Lodi Place
 - iv. THV 2301 West 3rd Street
 - v. THV 1455 Alvarado Street
 - b. Reflect the service funding allocation approved relative to the 17th Roadmap report dated May 12, 2023 (C.F. 20-0841-S34):

- i. \$2,162,160 for THV 850 Mission

36. AUTHORIZE the CAO to:

- a. Prepare Controller instructions or make necessary technical adjustments, including to the names of the Special Fund accounts recommended for this report, to implement the intent of these transactions, and authorize the Controller to implement these instructions; and
- b. Prepare any additional Controller instructions to reimburse City Departments for their accrued labor, material or permit costs related to projects in this report, to implement the intent of these transactions, and authorize the Controller to implement these instructions.

BACKGROUND

As part of the LA Alliance case, on June 16, 2020, the City reached an agreement with the County to create 6,700 new homeless housing units within 18 months to address the COVID-19 emergency. This agreement is referred to as the Homelessness Roadmap.

The Roadmap set the following targets:

- 700 beds in existing agreements with the County within 10 months
- 5,300 new beds within 10 months
- 700 new beds within 18 months

The City is required to open and maintain 6,000 new beds, not covered by existing City-County agreements. The County will provide up to \$60 million in annual service funding, totaling up to \$300 million over the five-year agreement term, based on the number of interventions open and occupied within 60 days of July 1st each year.

The City has met all obligations under the agreement and will continue to do so. As of September 30, 2023, 6,106 new beds are open and occupiable, which includes 781 rapid rehousing/shared housing point-in-time placements overseen by the Los Angeles Homeless Services Authority (LAHSA).

DISCUSSION

Proposed Tiny Home Village in Council District 13

This report allocates \$10,000 in Homeless Housing, Assistance, and Prevention Round 3 (HHAP-3) funds to support the construction of a Tiny Home Village (THV) in Council District (CD) 13. The parking lot owned by the Los Angeles Downtown Medical Center (LADMC) has been assessed to provide up to 91 beds to people experiencing homelessness (PEH). A service provider has not yet been identified, and a future funding report will program monies to support site operations.

The Bureau of Engineering (BOE) conducted a CEQA analysis, the results of which are provided separately. The BOE has determined that this use is categorically exempt from CEQA, and approval from the Mayor and City Council is required to proceed with the construction.

Reprogramming of Savings in ESG-CV Fund

This report recommends reprogramming up to \$895,476 in unspent funds from ESG-CV interim housing operating funds due to delays in service start date or construction delays for various Roadmap projects as outlined below in Table 1. Funding in the amount of \$286,789 of the reprogrammed ESG-CV funds are recommended for Homelessness Roadmap projects in this Report, and it is recommended to reserve the remaining balances for other Homelessness Roadmap projects.

Table 1: Recommended Reprogramming of ESG-CV Fund

Reprogrammed From	CD	Amount
2521-2525 Long Beach Ave.	9	\$19,800
1455 Alvarado St.	13	\$113,716
2301 West 3rd Street	13	\$155,883
Rapid Rehousing/ Shared Housing	Various	\$606,077
Total		\$875,676
Reprogrammed To	CD	Amount
Pano (Panorama Inn)	6	\$96,154
Travelodge (Normandie)	15	\$190,635
Total		\$286,789

Roadmap Site Renewal

On February 1, 2021, the Tiny Home Village (THV) located at 11471 Chandler Boulevard became open and occupiable for 75 people experiencing homelessness (PEH). This THV is operated by Hope the Mission, which was formerly known as Hope of the Valley. The Board of Recreation and Parks approved a one year extension on November 2, 2023 (Board Report 23-187), as the agreement with Hope the Mission expires on January 21, 2024. This report recommends the authority for the General Services Department (GSD) to extend the lease agreement with Hope the Mission for one year.

The A Bridge Home site located at 1818 S. Manhattan Pl. (formerly 1819 S. Western Ave.) in Council District 10 provides services for up to 15 PEH. This ABH is currently operated by the 1736 Family Crisis Center, in which the lease agreement expired on August 26, 2023 and is now in holdover. This report recommends the authority for GSD to extend the lease agreement with 1736 Family Crisis Center for one year.

County Roadmap Agreement Funding

This report recommends a total of \$1,599,357 of County Roadmap Agreement funds for the operations of four Roadmap sites. The first is a Tiny Home Village located at 850 North Mission Road in Council 14, which is slated to open in December 2023. This report recommends \$406,208 for the purchase of Furniture, Fixtures, and Equipment (FFE) that will support operations of this site. The second site located at 1214 Lodi Place located in CD 13 currently has 94 beds open and occupiable. 64 of these beds have been funded by the City, and in the second phase of operations, 30 beds were brought online and were previously funded by the County. The City has since taken over the funding of the 30 additional beds, and so this report recommends \$188,024 to support the operation of 30 beds through June 30, 2024. A future funding report will provide the remaining \$470,776 necessary to operate the 30 beds through the end of the Fiscal Year.

Additionally, funding for two THVs in CD 13 are recommended in this report. The first is located at 2301 W. 3rd St., which is currently operating at single occupancy with 64 beds. Recommendations in this report will support ramp up to double occupancy with 107 beds. The second THV is located at 1455 Alvarado St., which is operating at single occupancy with 43 beds. This report recommends monies that will close gaps in operation funding and will allow services to continue through the end of the Fiscal Year.

Conversion to Permanent Housing of Homekey1 Site

This report recommends approval of the Howard Johnson's, also known as The Sieroty, conversion to permanent housing. The Sieroty is a Homekey1 site located at 7432 Reseda Blvd., Los Angeles, CA 91335. The site is a hotel with 74 rooms acquired by the City with matching funds from the State of California Department of Housing and Community Development in December 2020. The site has been providing interim housing since early 2021 and it will be ready to start its conversion to permanent supportive and affordable housing in 2024. At the time of conversion, oversight of the property is transferred to the Los Angeles Housing Department (LAHD) and the legal documents protecting the City's interest in the property are revised and the property acquisition cost is converted to a residual receipts loan administered by LAHD.

This report also recommends the approval of the Woodman site, also known as Arleta, at 9120 Woodman Avenue, Los Angeles, CA 91334, as a recuperative care facility for homeless seniors with chronic illnesses. The second recommendation for this site requests that LAHSA and the City Attorney amend the operations/services contract, and legal documents protecting the City's interest in the property, respectively, with the owner/operator, National Health Foundation (NHF) to define the population that will be served. The Woodman/Arleta site is a former senior care facility with 148 rooms, which the City acquired with its Coronavirus Relief Funds in December 2020. Previously, the Mayor and Council approved this facility as an interim housing facility for seniors, 55 years of age or older. However, after discussions with the NHF, LAHSA and the Council Office, it was determined that the site's use as a recuperative care facility for unhoused

seniors with chronic illnesses had not been officially approved. The site is expected to start operations in January 2024.

LA Grand Hotel Extension

The Bureau of Engineering, Department of General Services, and the Mayor's Office have made the renovation and occupancy of the Mayfair Hotel a top priority. Updates to the renovation plan, budget and timeline are being reported to the Municipal Facilities Committee and Housing and Homelessness Committee in January 2024. The work plan is such that the Mayfair cannot be occupied until May 1, 2024, thus the Grand lease extension will allow for a seamless transition for those participants that were going to be relocated from the Grand to the Mayfair.

The Weingart Center is currently providing services at the LA Grand and has agreed to continue providing these services. The Mayor's Office will work with LAHD and LAHSA to extend the services contract to cover the new lease term.

The Inside Safe Homeless Emergency Account provides the funding for the lease at the LA Grand Hotel as well as the services. The extension that is recommended in this report will continue operations at the LA Grand through July 31, 2024.

LA River Project

The LA River Project began in September 2022 as an Encampment Resolution Fund-1 (ERF-1) funded project to serve people experiencing homelessness along the Los Angeles River in Council District 4 (CD4). As a result of efforts led by one of the contracted service providers, People Assisting the Homeless (PATH), 45 people living along the Los Angeles River accepted interim housing consisting of motel rooms and shelter beds after extensive outreach and relationship building. The success of PATH's outreach resulted in increased motel costs for this service provider at the start of year two of the project. PATH has submitted a revised budget which details how their year two allocation of ERF-1 funds of \$688,000 and an additional amount of \$286,270 will be utilized by the project end date of June 30, 2024 to continue to support these former encampment residents as they transition to permanent housing or time limited subsidy slots, which is a key component to the success of this project. This report recommends allocating \$286,270 in HHAP-1 funds for this purpose.

Ballona Wetlands Ecological Reserve Project

On September 12, 2023 California Interagency Council on Homelessness (Cal ICH) sent notification that the City's proposal, which focused on housing and services for people experiencing vehicular homelessness in the Ballona Wetlands Ecological Reserve in Council District 11 had been selected by the State and approved to receive \$2,428,329.75 in Encampment Resolution Fund-3L (ERF-3L) funds. The Ballona Wetlands Ecological Reserve includes one of the largest homeless encampments in the City of Los Angeles, and in particular

has one of the highest number of vehicular homeless sites. Given the unique needs of Angelinos experiencing vehicular homelessness Council District 11 will focus on increasing opportunities for permanent housing as an incentive for recreational vehicle relinquishment. The State has changed the grant guidelines to require that the funds be 100 percent obligated and 50 percent expended by June 30, 2025, and 100 percent expended by June 30, 2026, which has given the City needed flexibility for optimal program design. Cal ICH sent a notification of disbursement of the ERF-3L funds on November 28, 2023. On October 20, 2023 Council approved for the Office of the CAO to accept the grant funds (Council File: 23-1021) and as such this report recommends that the Controller create and appropriate a new appropriation account entitled Encampment Resolution Fund - Ballona (ERF-Ballona River).

Self-Help And Recovery Exchange (SHARE!) Collaborative Housing

On October 27, 2021, the Mayor and City Council approved the motion (Blumenfield - Buscaino; C.F. 21-1023), which provided funding to the Self-Help And Recovery Exchange (SHARE!) Collaborative Housing to connect interim housing participants to a more permanent supportive housing solution. The program has since housed 41 individuals and connects participants to stable housing, employment, and reunification with families. This Office recommends continuing funding in the total amount of \$0.35 million for 30 Time-Limited Subsidies slots and supportive services at the shared housing site in Council District 3.

Board of Public Works Hygiene Program

The City Council and Mayor approved funding First Homeless Housing, Assistance, and Prevention Round 3 (HHAP-3) Funding Report (C.F. 20-1524-S1) on June 12, 2023. The report allocated \$3.2 million to the Skid Row Pit Stop program and \$5.6 million to the Citywide Pit Stop program that is administered by the Board of Public Works. In June 2023, the Department of General Services established a new Citywide contract with United Site Services (USS), who is one of the contractors for the Mobile Pit Stop program that provides the portable hygiene unit materials and labor for the program. Under the new contract, there are cost increases relative to materials and labor. Based on the new quotations from USS, a total of \$3.6 million is needed for the 2023-24 operations. Currently, a total of \$2.1 million has been allocated to USS, therefore additional funding in the amount of \$1.5 million is required. This Report recommends adding an additional \$1.5 million of HHAP-3 funding to address the funding gap and continue operations through the remainder of the fiscal year.

FISCAL IMPACT STATEMENT

There is no additional General Fund impact as a result of the recommendations in this report. The recommendations in this report utilizes budgeted the City's General Fund previously approved for homelessness interventions. Additionally, the recommendations in this report also utilizes the Emergency Solutions Grant CARES Act (ESG-CV) funds and Homeless Housing, Assistance, and Prevention funds for homelessness interventions.

FINANCIAL POLICIES STATEMENT

The recommendations in this report comply with the City Financial Policies in that budgeted funds are being used to fund recommended actions.

Attachments:

1. COVID-19 Homelessness Roadmap Status of Capital and Operating Funding if 21st Homeless Roadmap Funding Recommendations are Approved.
2. LA Grand Hotel Leasing Term Sheet

MWS:ECG:KML:BK:MP:SBL:MCF:MAG:16240039

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TED ALLEN, PE
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

December 1, 2023

The Honorable Paul Krekorian
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

**CRISIS AND INTERIM HOUSING FACILITIES AT 406 N. BONNIE BRAE STREET AND
BURLINGTON AVENUE, 1818 S. MANHATTAN PLACE (FORMERLY 1819 S.
WESTERN AVENUE), 668 HOOVER STREET (FORMERLY 625 LA FAYETTE PLACE,
AND 11471 CHANDLER BOULEVARD (C.F. 20-0841) CALIFORNIA
ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF EXEMPTION (NOEs)**

Dear President Krekorian and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the new Interim Housing site at 406 N. Bonnie Brae Street and 413 Burlington Avenue, Council District 13; and the lease and continued use of the Crisis and Bridge Housing facilities at 1818 S. Manhattan Place (formerly 1819 S. Western Avenue), Council District 10; 668 S. Hoover Street (formerly 625 La Fayette Place), Council District 10; and 11471 Chandler Boulevard, Council District 2.

RECOMMENDATIONS

Staff recommends that the Council determine that the Interim Housing Project at 406 N. Bonnie Brae Street and 413 Burlington Avenue, which allows for funding allocation, construction, lease or similar agreement, and operation, for approximately up to three years; is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21080.27, applicable to City of Los Angeles emergency homeless shelters; and Public Resources Code Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, as also reflected in State CEQA Guidelines, Section 15269(c).

Staff also recommends that the Council determine that the leases and continued use of the Crisis and Bridge Housing facilities at 1818 S. Manhattan Place, 668 S. Hoover Street,

Honorable Paul Krekorian
December 1, 2023
Page 2 of 2

and 11471 Chandler Boulevard are statutorily exempt from CEQA under Public Resources Code Section 21080.27 applicable to City of Los Angeles emergency homeless shelters, and under Public Resources Code Section 21080(b)(4) as specific actions necessary to prevent or mitigate an emergency as also reflected in State CEQA Guidelines Section 15269(c). Please refer to the attached NOEs.

If you have any questions, please contact Maria Martin at Maria.Martin@lacity.org or (213) 485-5753.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Allen", with a red rectangular stamp or mark over the middle of the signature.

Ted Allen, PE
City Engineer

TA/JF/MM:

Box\EXE_ReadyforSignature\TSA\Outbox\Archived\2023\CEQA_NOE_TRANSMITTAL
_BOE_Report_CF20-0841_12-01-23

Attachment

cc: Deborah Weintraub, Bureau of Engineering
Jose Fuentes, Bureau of Engineering
Maria Martin, Bureau of Engineering
Marina Quinones, Bureau of Engineering

ATTACHMENTS

1. CEQA Notice of Exemption for
CD 13 - Bonnie Brae Tiny Home Village
2. CEQA Notice of Exemption for
1818 S. Manhattan Pl. (formerly 1819 S. Western Ave.) Bridge Home Lease
3. CEQA Notice of Exemption for
668 S. Hoover St. (formerly 625 La Fayette Pl.) Bridge Home Lease
4. CEQA Notice of Exemption for
CD 2 Tiny Home Village at 11471 Chandler Blvd. Lease

**CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III – City CEQA Guidelines)**

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b), and with the state Office of Planning and Research pursuant to Public Resources Code Section 21080.27(c) (AB1197), when applicable; and on the City website pursuant to Public Resources Code Section 21092.2(d). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 13
--	-------------------------------

PROJECT TITLE: CD 13 - Bonnie Brae Tiny Home Village	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 406 N. Bonnie Brae Street and 413 Burlington Avenue, in the Silver Lake - Echo Park - Elysian Valley Community Plan Area of the City of Los Angeles (City), Los Angeles County, 90026. See Figure 1: Project Location. T.G. 634-D1

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 13 - Bonnie Brae Tiny Home Village project (Project) consists of funding allocation, construction, a lease or similar agreement, and operation of an interim housing facility for people experiencing homelessness on a privately owned overflow parking lot. The Project includes approximately 47 sleeping cabins (*Pallet 64*), including three Americans with Disabilities Act (ADA) compliant accessible single units, six hygiene pallet units with restrooms and showers, an on-site laundry facility, a seating area for meal services, four pallets for administration and storage use, storage bins for each resident, a pet relief run/area, and onsite parking for staff. Additional site improvements include site and egress lighting, privacy fencing, and a guard booth, see ATTACHMENT 1: Conceptual Site Plan. The purpose of the Project is to provide emergency shelter for up to 90 individuals experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community. (Please see the attached narrative for more details.)

On _____, 2023, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
STATUTORY		15269(c)	21080.27 & 21080(b)(4)

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27, applicable to City of Los Angeles emergency homeless shelters, and PRC Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in Article 18 of the State CEQA Guidelines, Section 15269(c) (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE:
RECEIPT NO.	REC'D BY	DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Bonnie Brae Tiny Home Village will be constructed on an irregular-shaped privately owned underutilized overflow parking lot of the adjacent LA Downtown Medical Center. The Tiny Home Village will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to Crisis Housing Program for All Populations Scope of Required Services (LAHSA, 2020-2021). A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA. The Project includes approximately three on-site parking spaces, including an Americans with Disabilities Act (ADA) accessible space.

This Project will provide emergency shelter, hygiene, storage, food services and case management for up to 90 individuals experiencing homelessness. Additional services may include job training, group therapy, resume building and other workshops. Project operations will include approximately six to eight employees scheduled in shifts throughout the day, approximately three employees onsite at one time; with site security provided on a 24/7 basis or per a security plan consistent with the Los Angeles Homeless Services Authority's (LAHSA) standards.

The Project site consists of an irregular-shaped area, approximately 25,000 square feet in size, with frontages along Bonnie Brae Street, Temple Street, and Burlington Avenue. The Project site lots are zoned R3-1VL, which is a residential zone that allows for multi-family uses. The Project site qualifies as an infill site as defined by Public Resources Code Section 21061.3, since it is currently developed with a qualified urban use and at least 75 percent of the perimeter of the site adjoins parcels developed with qualified urban uses. Residential uses are located to the north of the site, commercial and residential uses to the south, residential uses and a hospital to the east, and commercial uses to the west (City of Los Angeles Department of City Planning, 2023).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Based on information from the Census and the Los Angeles Homeless Services Authority (LAHSA), in 2020, homeless persons constituted approximately 1.07 percent of the City's population. (U.S Census Bureau, 2021 & LAHSA, 2020)

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabilski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as Emergency Room (ER) visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the *New England Journal of Medicine* found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

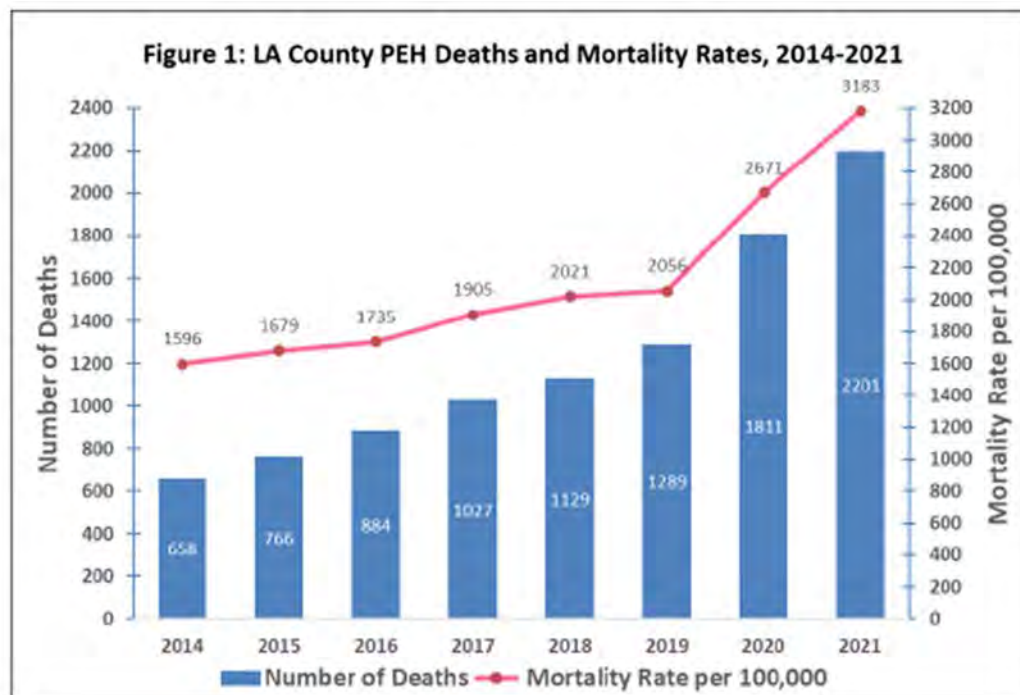
Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*). During the first six months of 2020, LAPD reported 1,738 instances where a homeless individual was a victim of a serious crime including homicide, rape, aggravated assault, burglary, and larceny (LAPD, 2020).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (Commander Dominic H. Choi, 2019). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*). According to the LAPD Use of Force Year-End Report in 2020, among the 41,290 estimated homeless individuals throughout the City, 7,872 persons were reported to be victims of a violent or property crime. In the same year, 5,722 persons experiencing homelessness were reported as suspects of a violent or property crime (LAPD, 2020). On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-

Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

In May 2023, LA County Department of Public Health released a report on its finding that mortality rates among the homeless population have continued to drastically rise from 2,056 per 100,000 people experiencing homelessness in 2019 to 3,183 per 100,000 in 2021. (LAC Department of Public Health, May 2023.) Indicators of mortality in the homeless population "began increasing dramatically beginning in 2020, with the mortality rate increasing by 55% between 2019 and 2021." (LAC Department of Public Health, May 2023.)



(Source: LA County DPH May 2023.)

In a press release dated May 12, 2023, the LA County Board of Supervisors released statements noting “We have declared a state of emergency in Los Angeles County because there are far too many people on our streets” and the report “underscores how important it is that we continue to treat the homelessness crisis with a sense of urgency and move as many people as possible inside so we can begin to save their lives.” (LA County DPH May 12, 2023.)

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt Assembly Bill 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the Homeless Counts, released since 2018, unexpectedly documented dramatic increases in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2022) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

LAHSA prepared a 2021 shelter point-in-time count for the City of Los Angeles that estimated the number and demographic characteristics of the sheltered homeless population on a single night in January 2021. Released in July 20, 2021, it shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing sheltered homelessness increased yet again, as shown in *Table 4 - 2021 Housing Inventory Count and Shelter Count Data Summary* (LAHSA, 2021). The 2021 unsheltered street count could not be conducted due to the COVID-19 pandemic. However, the availability of vaccinations enabled the resumption of the Homeless Count for February 2022 with appropriate precautions (LAHSA, 2022).

Table 4 2021 Housing Inventory Count and Shelter Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	12,503	1% Increase

Homeless Count data in 2022 showed the City's homeless population continued to unexpectedly increase 1.67 percent from 41,290 to 41,980 persons, and while is sheltered population increased 8.7 percent, its unsheltered population only decreased 1.37 percent, as shown *Table 5 - 2022 Homeless Count Data Summary* (LAHSA, 2022).

Table 5 2022 Homeless Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	13,522	8.72% Increase
Unsheltered Homeless	28,458	1.37% Decrease
Total Homeless Persons	41,980	1.67% Increase

LAHSA published its 2023 Homeless Count, released on June 29, 2023, which shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing sheltered homelessness dramatically increased, while the documented number of unsheltered homelessness indicated a slight increase as shown in *Table 6 - 2023 Homeless Count Data Summary* (LAHSA, 2023).

Table 6
2023 Homeless Count Data Summary

	Number of Individuals	Change from 2023
Sheltered Homeless	13,580	0.43% Increase
Unsheltered Homeless	32,680	14.84% Increase
Total Homeless Persons	46,260	10.2% Increase

Taken together, the unexpected and dramatic increase in homelessness, exacerbated by the COVID-19 pandemic, is an emergency in the City of Los Angeles. This situation presents documented dangers to health, life, and property and a burden on, and loss of access to, essential public services, which presents an emergency as defined by CEQA as explained below.

On December 12, 2022, City of Los Angeles Mayor Bass declared a homelessness emergency in the City of Los Angeles. She specifically stated that she “declare[s] the existence of a local emergency and direct[s] all Divisions of the Emergency Operations Organization (EOO) and all other City Departments to take necessary steps for the protection of life, health and safety in the City of Los Angeles.” (City of Los Angeles, Dec. 12, 2022.) The Mayor’s declaration discussed how the homelessness crisis created a dramatic unanticipated impact on the population, and how it displaced people even greater than major hurricanes and earthquake events, all of which are emergencies requiring prompt action to avoid clear and imminent danger to the displaced populations. The City Council ratified the declaration. (CF No. 22-1545.)

On July 7, 2023, Mayor Bass, again, declared a local housing and homelessness emergency because “the City still finds itself in an emergency” with emergency conditions continuing to require prompt abatement due to the severe shortage of beds available to the unhoused population. (City of Los Angeles July 7, 2023.) The Mayor noted the City “is acting with urgency” to provide shelter for the homeless, and she “declare[d] the existence of a local emergency on affordable housing and homelessness and direct[ed] all City Departments to take necessary steps for protection of life, health and safety in the City of Los Angeles.” (City of Los Angeles, July 7, 2023.) In a press release, the Mayor added “It’s no secret that Los Angeles is facing an emergency when it comes to homelessness. This is an issue of life and death for the thousands of people who are living in tents and cars. That’s why I signed an updated declaration of emergency and have continued to lock arms with the City Council to maintain our momentum toward confronting homelessness and building more affordable housing.” (City of Los Angeles, July 10, 2023.)

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to PRC Section 21080.27

Assembly Bill (AB) 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 was to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in PRC Section 21080.27, and thus the Project is exempt from CEQA pursuant to PRC Section 21080.27.

1. City of Los Angeles Declaration of a Shelter Crisis

PRC Section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under PRC Section 21080.27, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the Project’s programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and

emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the Project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. **All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards.** Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the Project's emergency shelter meets the Housing First requirements relative to PRC Section 21080.27.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides up to 90 beds. This Project is pet friendly and includes a pet relief area. The Project has storage bins for personal possessions for each individual. The Project is designed to provide privacy to participants by providing doors and locks in each pallet. Therefore, the project is managed and designed to allow the privacy of participants, which allows for the presence of partners, and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this Project, meet these requirements. Therefore, none of the noted conditions would preclude access to the Project, and the Project is considered crisis and bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and PRC Section 21080.27.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference

section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under PRC Section 21080.27, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the family or individual's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing

- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this Project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this Project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires **Low Barrier Navigation Centers** to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program

Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under PRC Section 21080.27

PRC Section 21080.27 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).)

The Project site is C2-2D-CPIO, which is a mixed-use zone that allows multifamily uses; thus, the Project's location qualifies for the exemption. In addition, the site also qualifies as an infill site location because the site is developed with, and at least 75 percent of the perimeter of the site is developed with qualified urban uses. As indicated above,

commercial uses are located to the north, east, and south of the site and residential uses are located to the west of the site. (City of Los Angeles Department of City Planning, 2023).

5. The Project Involves Qualified Funding Under PRC Section 21080.27

PRC Section 21080.27(a)(2)(A)-(D) exempts emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources.

The City Council is authorizing use of some Homeless Emergency Aid program (HEAP) funds for construction of the facility. HEAP is a qualified funding source under Section 21080.27, and therefore at least a portion of the funding of the Project related to its establishment and operation used qualified funding that qualifies the Project for exemption under Section 21080.27.

6. The City's Actions Qualify under PRC Section 21080.27 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

PRC Section 21080.27(b)(1), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves funding allocation, construction, lease or similar agreement, and operation of a homeless shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under PRC Section 21080.27.

7. PRC Section 21080.27 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

B. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

PRC Section 21080(b)(4) provides that CEQA does not apply, to "specific actions necessary to prevent or mitigate an emergency." PRC section 21060.3 defines Emergency as, "a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services." Section 21060.3 further provides that Emergency, "includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage."

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, "Emergency Projects," provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City's already dangerously large homeless population, also adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The dramatic rise in the homeless population is a sudden unexpected occurrence, as is the unexpected and sudden occurrence of losing access to adequate shelter and essential services for each individual newly experiencing homelessness. Each is an emergency presenting impending acute harm to the individuals experiencing homelessness that would be prevented and mitigated through providing housing to those individuals, including through the emergency shelter provided by this Project. The Project, therefore, is exempt from CEQA environmental review pursuant to PRC Section 21080(b)(4) since it prevents and mitigates such imminent loss and damage.

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CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III - City CEQA Guidelines)

ATTACHMENT NO. 2

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 10
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PROJECT TITLE: 1818 S. Manhattan Pl. (formerly 1819 S. Western Ave.) Bridge Home Lease	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 1818 S. Manhattan Place, in the South Los Angeles Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 633-H5.

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The 1818 S. Manhattan Pl. (formerly 1819 S. Western Ave.). Bridge Home Lease (Project) consists of an extended, or new lease, for approximately up to three years with continued use/operation, for approximately up to six years total use of the temporary Bridge Home facility. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide approximately up to three additional years, to the previously approved three years, of emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include people experiencing homelessness, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2023, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080.27 & 21080(b)(4)

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27, applicable to City of Los Angeles emergency homeless shelters and PRC Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in Article 18 of the Sate CEQA Guidelines, Section 15269(c). This determination is consistent with the NOE supporting documents in Council File (CF) No. 18-0392 and consistent with, and supported by, the City Council's prior actions approving the development and use of this shelter (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: <div style="text-align: right; margin-top: 10px;">Maria Martin</div>	TITLE: Environmental Affairs Officer Environmental Management Group	DATE:
FEE: 75.00_____	RECEIPT NO.	REC'D BY
		DATE

DISTRIBUTION: (1) County Clerk; (2) Agency Record

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project consists of an approximately up to three-year lease extension, or new lease, and operation of the Bridge Home facility located on the City-owned property at 1818 S. Manhattan Place in furtherance of providing emergency homeless shelter in the City of Los Angeles. The Bridge Home facility was found to be categorically exempt and was approved by the City Council on March 22, 2019 (CF No. 18-0392). The documents supporting this determination (CF No. 18-0392) are incorporated herein by reference as support for this CEQA determination. This Project continues the existing use of the facility, that was built, and is currently operating, without substantial change.

The 15-bed Bridge Home facility, which was constructed using a prefabricated shipping container, opened on September 21, 2020, and will continue to be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to, *Crisis Housing Program for All Populations Scope of Required Services* (LAHSA, 2020-2021). A third-party service provider, e.g., 1736 FCC, will operate the Project for the City, as it has been for the past three years, and it is anticipated that a lease, lease extension, or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

Project operation continues per a security plan consistent with the LAHSA's standards. By creating a stable environment and providing access to basic needs, clients can maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will continue to be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section.

The Project site consists of a rectangular-shaped parcel within the Council District 10 Office site. The Project site has an area of approximately 6,632 square feet and frontage along Manhattan Place. The site's land use designation in the City's General Plan is Community Commercial and is zoned C2-2D-CPIO, which is a mixed-use zone that allows multifamily uses. The property also qualifies as an infill site as defined by Public Resources Code Section 21061.3, since it is currently developed with a qualified urban use and at least 75 percent of the perimeter of the site, beyond the adjoining streets, is developed with qualified urban uses. Commercial uses are located to the north, east, and south of the site. Residential uses are located to the west of the site. The site itself is currently developed with a temporary shelter for people experiencing homelessness. (City of Los Angeles Department of City Planning, 2023).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Based on information from the Census and the Los Angeles Homeless Services Authority (LAHSA), in 2020, homeless persons constituted approximately 1.07 percent of the City's population. (U.S Census Bureau, 2021 & LAHSA, 2020)

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabalski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as Emergency Room (ER) visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

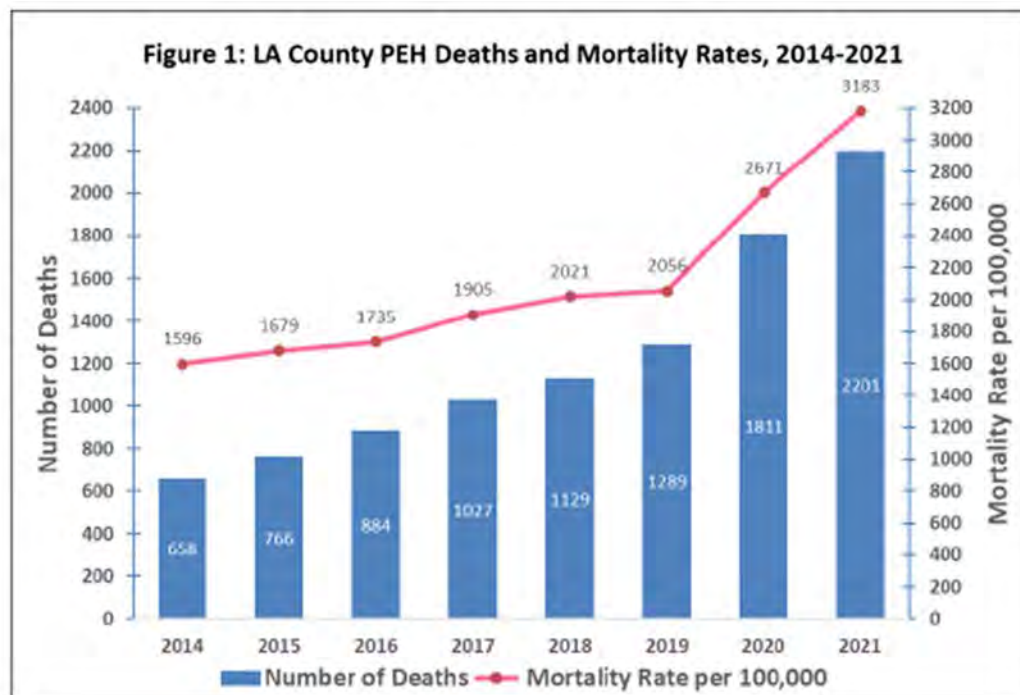
Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*). During the first six months of 2020, LAPD reported 1,738 instances where a homeless individual was a victim of a serious crime including homicide, rape, aggravated assault, burglary, and larceny (LAPD, 2020).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (Commander Dominic H. Choi, 2019). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*). According to the LAPD Use of Force Year-

End Report in 2020, among the 41,290 estimated homeless individuals throughout the City, 7,872 persons were reported to be victims of a violent or property crime. In the same year, 5,722 persons experiencing homelessness were reported as suspects of a violent or property crime (LAPD, 2020). On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

In May 2023, LA County Department of Public Health released a report on its finding that mortality rates among the homeless population have continued to drastically rise from 2,056 per 100,000 people experiencing homelessness in 2019 to 3,183 per 100,000 in 2021. (LAC Department of Public Health, May 2023.) Indicators of mortality in the homeless population "began increasing dramatically beginning in 2020, with the mortality rate increasing by 55% between 2019 and 2021." (LAC Department of Public Health, May 2023.)



(Source: LA County DPH May 2023.)

In a press release dated May 12, 2023, the LA County Board of Supervisors released statements noting “We have declared a state of emergency in Los Angeles County because there are far too many people on our streets” and the report “underscores how important it is that we continue to treat the homelessness crisis with a sense of urgency and move as many people as possible inside so we can begin to save their lives.” (LA County DPH May 12, 2023.)

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt Assembly Bill 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the Homeless Counts, released since 2018, unexpectedly documented dramatic increases in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2022) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

LAHSA prepared a 2021 shelter point-in-time count for the City of Los Angeles that estimated the number and demographic characteristics of the sheltered homeless population on a single night in January 2021. Released in July 20, 2021, it shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing sheltered homelessness increased yet again, as shown in *Table 4 - 2021 Housing Inventory Count and Shelter Count Data Summary* (LAHSA, 2021). The 2021 unsheltered street count could not be conducted due to the COVID-19 pandemic. However, the availability of vaccinations enabled the resumption of the Homeless Count for February 2022 with appropriate precautions (LAHSA, 2022).

Table 4 2021 Housing Inventory Count and Shelter Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	12,503	1% Increase

Homeless Count data in 2022 showed the City's homeless population continued to unexpectedly increase 1.67 percent from 41,290 to 41,980 persons, and while is sheltered population increased 8.7 percent, its unsheltered population only decreased 1.37 percent, as shown *Table 5 - 2022 Homeless Count Data Summary* (LAHSA, 2022).

Table 5 2022 Homeless Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	13,522	8.72% Increase
Unsheltered Homeless	28,458	1.37% Decrease
Total Homeless Persons	41,980	1.67% Increase

LAHSA published its 2023 Homeless Count, released on June 29, 2023, which shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing sheltered homelessness dramatically increased, while the documented number of unsheltered homelessness indicated a slight increase as shown in *Table 6 - 2023 Homeless Count Data Summary* (LAHSA, 2023).

Table 6
2023 Homeless Count Data Summary

	Number of Individuals	Change from 2023
Sheltered Homeless	13,580	0.43% Increase
Unsheltered Homeless	32,680	14.84% Increase
Total Homeless Persons	46,260	10.2% Increase

Taken together, the unexpected and dramatic increase in homelessness, exacerbated by the COVID-19 pandemic, is an emergency in the City of Los Angeles. This situation presents documented dangers to health, life, and property and a burden on, and loss of access to, essential public services, which presents an emergency as defined by CEQA as explained below.

On December 12, 2022, City of Los Angeles Mayor Bass declared a homelessness emergency in the City of Los Angeles. She specifically stated that she “declare[s] the existence of a local emergency and direct[s] all Divisions of the Emergency Operations Organization (EOO) and all other City Departments to take necessary steps for the protection of life, health and safety in the City of Los Angeles.” (City of Los Angeles, Dec. 12, 2022.) The Mayor’s declaration discussed how the homelessness crisis created a dramatic unanticipated impact on the population, and how it displaced people even greater than major hurricanes and earthquake events, all of which are emergencies requiring prompt action to avoid clear and imminent danger to the displaced populations. The City Council ratified the declaration. (CF No. 22-1545.)

On July 7, 2023, Mayor Bass, again, declared a local housing and homelessness emergency because “the City still finds itself in an emergency” with emergency conditions continuing to require prompt abatement due to the severe shortage of beds available to the unhoused population. (City of Los Angeles July 7, 2023.) The Mayor noted the City “is acting with urgency” to provide shelter for the homeless, and she “declare[d] the existence of a local emergency on affordable housing and homelessness and direct[ed] all City Departments to take necessary steps for protection of life, health and safety in the City of Los Angeles.” (City of Los Angeles, July 7, 2023.) In a press release, the Mayor added “It’s no secret that Los Angeles is facing an emergency when it comes to homelessness. This is an issue of life and death for the thousands of people who are living in tents and cars. That’s why I signed an updated declaration of emergency and have continued to lock arms with the City Council to maintain our momentum toward confronting homelessness and building more affordable housing.” (City of Los Angeles, July 10, 2023.)

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to PRC Section 21080.27

Assembly Bill (AB) 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 was to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in PRC 21080.27, and thus the Project is exempt from CEQA pursuant to PRC Section 21080.27.

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code Section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the Project’s programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of

control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take

reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the Project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a “Housing First” shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). “Housing First” means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. **All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards.** Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that

housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the Project's emergency shelter meets the Housing First requirements relative to PRC Section 21080.27.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 15 beds. This Project is pet friendly and includes a pet relief area. Participants are allowed to bring their pets to the shelter. The Project has storage areas for personal possessions. There are separate sleeping beds with communal bathrooms.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this Project, meet these requirements. Therefore, none of the noted conditions would preclude access to the Project, and the Project is considered crisis and bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and PRC Section 21080.27.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of **Low Barrier Navigation Center** set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the family or individual's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative

- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this Project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this Project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001,

Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under PRC Section 21080.27

PRC Section 21080.27 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).)

The property also qualifies as an infill site as defined by Public Resources Code Section 21061.3, since it is currently developed with a qualified urban use and at least 75 percent of the perimeter of the site, beyond the adjoining streets, is developed with qualified urban uses.

The Project site is C2-2D-CPIO, which is a mixed-use zone that allows multifamily uses; thus, the Project's location qualifies for the exemption. In addition, the site also qualifies as an infill site location because the site is developed with, and at least 75 percent of the perimeter of the site is developed with qualified urban uses. As indicated above, commercial uses are located to the north, east, and south of the site and residential uses are located to the west of the site. (City of Los Angeles Department of City Planning, 2023).

5. The Project Involves Qualified Funding Under PRC Section 21080.27

PRC Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources.

The City Council authorized use of some Homeless Emergency Aid program (HEAP) funds (C.F. No. 18-0392) for construction and operation of the facility. HEAP is a qualified funding source under Section 21080.27, and therefore at least a portion of the funding of the Project related to its establishment and operation used qualified funding that qualifies the Project for exemption under Section 21080.27.

6. The City's Actions Qualify under PRC Section 21080.27 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

PRC Section 21080.27(b)(1), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves the continued lease and operation of an existing homeless shelter that the City constructed and operated for several years, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under PRC Section 21080.27.

7. PRC Section 21080.27 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

B. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

PRC Section 21080(b)(4) provides that CEQA does not apply, to "specific actions necessary to prevent or mitigate an emergency." PRC section 21060.3 defines Emergency as, "a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services." Section 21060.3 further provides that

Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

- (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

- (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, also adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The dramatic rise in the homeless population is a sudden unexpected occurrence, as is the unexpected and sudden occurrence of losing access to adequate shelter and essential services for each individual newly experiencing homelessness. Each is an emergency presenting impending acute harm to the individuals experiencing homelessness that would be prevented and mitigated through providing housing to those individuals, including through the emergency shelter provided by this Project. The Project, therefore, is exempt from CEQA environmental review pursuant to PRC Section 21080(b)(4) since it prevents and mitigates such imminent loss and damage.

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CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III - City CEQA Guidelines)

ATTACHMENT NO. 3

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 10
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PROJECT TITLE: 668 S. Hoover St. (formerly 625 La Fayette Pl.) Bridge Home Lease	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 668 Hoover Street, in the Wilshire Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 634-B2 and 634-B3.

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The 668 S. Hoover St. (formerly 625 La Fayette Pl.) Bridge Home Lease (Project) consists of an extended, or new lease, for approximately up to one year with continued use/operation, for approximately up to 4.5 years total use of the temporary Bridge Home facility. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide approximately up to one additional year, to the previously approved three years, of emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include people experiencing homelessness, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2023, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080.27 & 21080(b)(4)

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27, applicable to City of Los Angeles emergency homeless shelters and PRC Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in Article 18 of the State CEQA Guidelines, Section 15269(c); This determination is consistent with the NOE supporting documents in Council File (CF) No. 18-0392 and consistent with, and supported by, the City Council's prior actions approving the development and use of this shelter (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: <div>Pending Project approval.</div> Maria Martin		TITLE: Environmental Affairs Officer Environmental Management Group	DATE:
FEE: 75.00_____	RECEIPT NO.	REC'D BY	DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project consists of an approximately one-year lease extension, or new lease, and operation of the Bridge Home facility located on the City-owned property at 668 S. Hoover Street in furtherance of providing emergency homeless shelter in the City of Los Angeles. The Bridge Home facility was found to be categorically exempt and was approved by the City Council on March 22, 2019 (CF No. 18-0392). The documents supporting this determination (CF No. 18-0392) are incorporated herein by reference as support for this CEQA determination. This Project continues the existing use of the facility, that was built, and is currently operating, without substantial change.

The 70-bed Bridge Home facility, which was constructed using prefabricated shipping containers, opened on March 1, 2021, and will continue to be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to, *Crisis Housing Program for All Populations Scope of Required Services* (LAHSA, 2020-2021). A third-party service provider, e.g., The Salvation Army, will operate the Project for the City, as it has been for the past three years, and it is anticipated that a lease, lease extension, or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

Project operation continues per a security plan consistent with the LAHSA's standards. By creating a stable environment and providing access to basic needs, clients can maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will continue to be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section.

The Project site consists of a triangle-shaped parcel with an area of approximately 30,127 square feet with frontage along Hoover Street, Wilshire Boulevard, and La Fayette Park Place. The Project site is zoned OS-1XL, with a City of Los Angeles General Plan Open Space land use designation. The property qualifies as an infill site as defined by Public Resources Code Section 21061.3, since it is currently developed with a qualified urban use and at least 75 percent of the perimeter of the site, beyond the adjoining streets, is developed with qualified urban uses. Commercial and residential uses are located to the west, east, and south of the site. A public park, an institutional government use, is located to the north of the site. The site itself is currently developed with a temporary shelter for people experiencing homelessness. (City of Los Angeles Department of City Planning, 2023).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Based on information from the Census and the Los Angeles Homeless Services Authority (LAHSA), in 2020, homeless persons constituted approximately 1.07 percent of the City's population. (U.S Census Bureau, 2021 & LAHSA, 2020)

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabalski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as Emergency Room (ER) visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

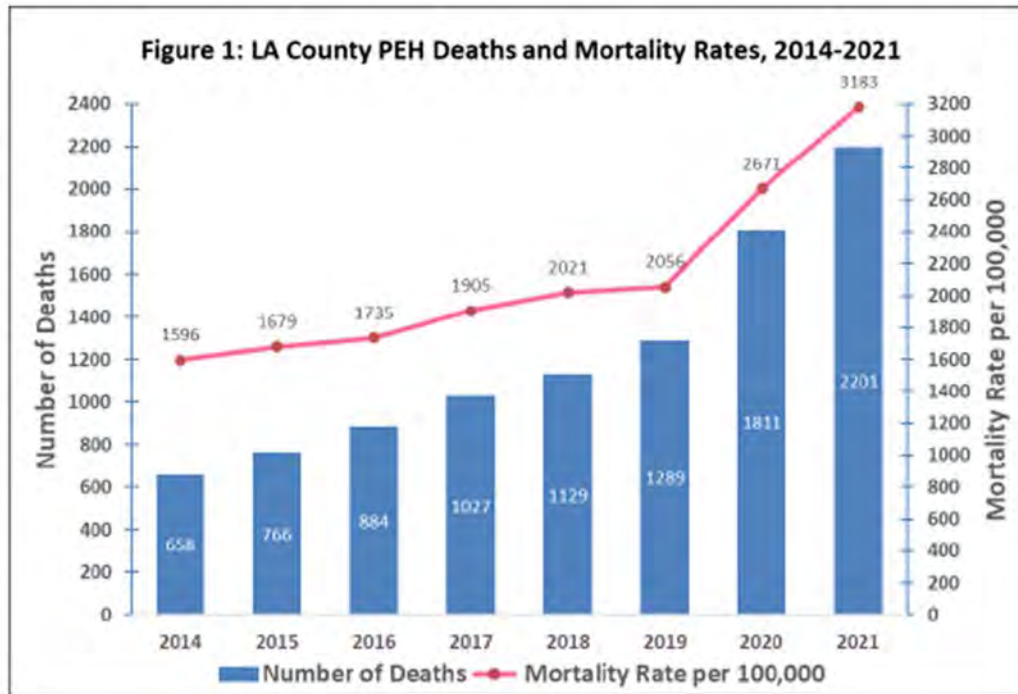
Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*). During the first six months of 2020, LAPD reported 1,738 instances where a homeless individual was a victim of a serious crime including homicide, rape, aggravated assault, burglary, and larceny (LAPD, 2020).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (Commander Dominic H. Choi, 2019). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*). According to the LAPD Use of Force Year-

End Report in 2020, among the 41,290 estimated homeless individuals throughout the City, 7,872 persons were reported to be victims of a violent or property crime. In the same year, 5,722 persons experiencing homelessness were reported as suspects of a violent or property crime (LAPD, 2020). On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

In May 2023, LA County Department of Public Health released a report on its finding that mortality rates among the homeless population have continued to drastically rise from 2,056 per 100,000 people experiencing homelessness in 2019 to 3,183 per 100,000 in 2021. (LAC Department of Public Health, May 2023.) Indicators of mortality in the homeless population "began increasing dramatically beginning in 2020, with the mortality rate increasing by 55% between 2019 and 2021." (LAC Department of Public Health, May 2023.)



(Source: LA County DPH May 2023.)

In a press release dated May 12, 2023, the LA County Board of Supervisors released statements noting “We have declared a state of emergency in Los Angeles County because there are far too many people on our streets” and the report “underscores how important it is that we continue to treat the homelessness crisis with a sense of urgency and move as many people as possible inside so we can begin to save their lives.” (LA County DPH May 12, 2023.)

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt Assembly Bill 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the Homeless Counts, released since 2018, unexpectedly documented dramatic increases in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2022) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

LAHSA prepared a 2021 shelter point-in-time count for the City of Los Angeles that estimated the number and demographic characteristics of the sheltered homeless population on a single night in January 2021. Released in July 20, 2021, it shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing sheltered homelessness increased yet again, as shown in *Table 4 - 2021 Housing Inventory Count and Shelter Count Data Summary* (LAHSA, 2021). The 2021 unsheltered street count could not be conducted due to the COVID-19 pandemic. However, the availability of vaccinations enabled the resumption of the Homeless Count for February 2022 with appropriate precautions (LAHSA, 2022).

Table 4 2021 Housing Inventory Count and Shelter Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	12,503	1% Increase

Homeless Count data in 2022 showed the City's homeless population continued to unexpectedly increase 1.67 percent from 41,290 to 41,980 persons, and while is sheltered population increased 8.7 percent, its unsheltered population only decreased 1.37 percent, as shown *Table 5 - 2022 Homeless Count Data Summary* (LAHSA, 2022).

Table 5 2022 Homeless Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	13,522	8.72% Increase
Unsheltered Homeless	28,458	1.37% Decrease
Total Homeless Persons	41,980	1.67% Increase

LAHSA published its 2023 Homeless Count, released on June 29, 2023, which shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing sheltered homelessness dramatically increased, while the documented number of unsheltered homelessness indicated a slight increase as shown in *Table 6 - 2023 Homeless Count Data Summary* (LAHSA, 2023).

Table 6
2023 Homeless Count Data Summary

	Number of Individuals	Change from 2022
Sheltered Homeless	13,580	0.43% Increase
Unsheltered Homeless	32,680	14.84% Increase
Total Homeless Persons	46,260	10.2% Increase

Taken together, the unexpected and dramatic increase in homelessness, exacerbated by the COVID-19 pandemic, is an emergency in the City of Los Angeles. This situation presents documented dangers to health, life, and property and a burden on, and loss of access to, essential public services, which presents an emergency as defined by CEQA as explained below.

On December 12, 2022, City of Los Angeles Mayor Bass declared a homelessness emergency in the City of Los Angeles. She specifically stated that she “declare[s] the existence of a local emergency and direct[s] all Divisions of the Emergency Operations Organization (EOO) and all other City Departments to take necessary steps for the protection of life, health and safety in the City of Los Angeles.” (City of Los Angeles, Dec. 12, 2022.) The Mayor’s declaration discussed how the homelessness crisis created a dramatic unanticipated impact on the population, and how it displaced people even greater than major hurricanes and earthquake events, all of which are emergencies requiring prompt action to avoid clear and imminent danger to the displaced populations. The City Council ratified the declaration. (CF No. 22-1545.)

On July 7, 2023, Mayor Bass, again, declared a local housing and homelessness emergency because “the City still finds itself in an emergency” with emergency conditions continuing to require prompt abatement due to the severe shortage of beds available to the unhoused population. (City of Los Angeles July 7, 2023.) The Mayor noted the City “is acting with urgency” to provide shelter for the homeless, and she “declare[d] the existence of a local emergency on affordable housing and homelessness and direct[ed] all City Departments to take necessary steps for protection of life, health and safety in the City of Los Angeles.” (City of Los Angeles, July 7, 2023.) In a press release, the Mayor added “It’s no secret that Los Angeles is facing an emergency when it comes to homelessness. This is an issue of life and death for the thousands of people who are living in tents and cars. That’s why I signed an updated declaration of emergency and have continued to lock arms with the City Council to maintain our momentum toward confronting homelessness and building more affordable housing.” (City of Los Angeles, July 10, 2023.)

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to PRC Section 21080.27

Assembly Bill (AB) 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 was to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in PRC Section 21080.27, and thus the Project is exempt from CEQA pursuant to PRC Section 21080.27.

1. City of Los Angeles Declaration of a Shelter Crisis

PRC Section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code Section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under PRC Section 21080.27, emergency shelters must meet the definition of "Low Barrier Navigational Center" in Government Code Section 65660, which defines Low Barrier Navigation Center as a "Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a "service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing." This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the Project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and

emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the Project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the Project's emergency shelter meets the Housing First requirements relative to PRC Section 21080.27.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 70 beds. This Project is pet friendly and includes a pet relief area. Participants are allowed to bring their pets to the shelter. The Project has storage areas for personal possessions. The Project is designed to provide privacy to participants by providing individual sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the Project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this Project, meet these requirements. Therefore, none of the noted conditions would preclude access to the Project, and the Project is considered crisis and bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and PRC Section 21080.27.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference

section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under PRC Section 21080.27, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the family or individual's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing

- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this Project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this Project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program

Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under PRC Section 21080.27

PRC Section 21080.27 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).)

The Project site is zoned OS-1XL, which is a nonresidential zone which allows residential uses under certain circumstances, thus the Projects location qualifies for the exemption. In addition, the site also qualifies as an infill site location because the site is developed with, and at least 75 percent of the perimeter of the site, beyond the adjoining streets, is

developed with qualified urban uses. As indicated above, commercial and residential uses are located to the west, east, and south of the site and a public park, an institutional government use, is located to the north. (City of Los Angeles Department of City Planning, 2023).

5. The Project Involves Qualified Funding Under PRC Section 21080.27

PRC Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources.

The City Council authorized use of some Homeless Emergency Aid program (HEAP) funds (C.F. No. 18-0392) for construction and operation of the facility. HEAP is a qualified funding source under Section 21080.27, and therefore at least a portion of the funding of the Project related to its establishment and operation used qualified funding that qualifies the Project for exemption under Section 21080.27.

6. The City's Actions Qualify under PRC Section 21080.27 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

PRC Section 21080.27(b)(1), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves the continued lease and operation of an existing homeless shelter that the City constructed and operated for several years, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under PRC Section 21080.27.

7. PRC Section 21080.27 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to PRC Section 21080.27.

B. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

PRC Section 21080(b)(4) provides that CEQA does not apply, to "specific actions necessary to prevent or mitigate an emergency." Public Resources Code section 21060.3 defines Emergency as, "a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services." Section 21060.3 further provides that Emergency, "includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage."

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, "Emergency Projects," provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City's already dangerously large homeless population, also adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The dramatic rise in the homeless population is a sudden unexpected occurrence, as is the unexpected and sudden occurrence of losing access to adequate shelter and essential services for each individual newly experiencing homelessness. Each is an emergency presenting impending acute harm to the individuals experiencing homelessness that would be prevented and mitigated through providing housing to those individuals, including through the emergency shelter provided by this Project. The Project, therefore, is exempt from CEQA environmental review pursuant to PRC Section 21080(b)(4), since it prevents and mitigates such imminent loss and damage.

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COUNTY CLERK'S USE

**CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III – City CEQA Guidelines)**

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b), and with the state Office of Planning and Research pursuant to Public Resources Code Section 21080.27(c), when applicable; and on the City website pursuant to Public Resources Code Section 21092.2(d). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 2
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PROJECT TITLE: CD 2 Tiny Home Village at 11471 Chandler Blvd. Lease	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 11471 Chandler Boulevard (Los Angeles County Assessor's Parcel No. 2350-011-900), in the North Hollywood Recreation Center (11466 Chandler Boulevard), in the North Hollywood - Valley Village Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 562-J2

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 2 Tiny Home Village at 11471 Chandler Blvd. Lease project (Project) consists of an extended, or new lease, for approximately up to one year with continued use/operation, for approximately up to four years total use of the Tiny Home Village or Pallet Housing. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide approximately up to one additional year, to the previously approved three years, of emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached.) On November 2, 2023, the Board of Recreation and Park Commission determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project. On _____, the City Council determined the Project is exempt under CEQA and approved the Project.

CONTACT PERSON Maria Martin	CONTACT INFORMATION Maria.Martin@lacity.org
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EXEMPT STATUS:	<u>CITY CEQA</u> <u>GUIDELINES</u>	<u>STATE CEQA</u> <u>GUIDELINES</u>	<u>CA PUBLIC</u> <u>RESOURCE CODE</u>
STATUTORY		15269(c)	21080.27 & 21080(b)(4)

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27, applicable to City of Los Angeles emergency homeless shelters and PRC Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in Article 18 of the State CEQA Guidelines, Section 15269(c). This determination is consistent with the Notice of Exemption (NOE) supporting documents in the Board of Recreation and Park Commission File Nos. 20-160 and 23-187, and Council File (CF) No. 20-0841; and consistent with, and supported by, the City Council's prior actions approving the development and use of this shelter (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: <i>Pending approval</i> Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE:
RECEIPT NO.	REC'D BY	DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project consists of an approximately up to one-year lease extension or new lease, and operation, in furtherance of providing an emergency homeless shelter in the City of Los Angeles at the Tiny Home Village located on a City-owned property at 11471 Chandler Boulevard that was found to be statutorily exempt and approved by the Board of Recreation and Park Commissioners on August 6, 2020 (Board Report No. 20-160) and subsequently by the City Council on September 9, 2020 (CF No. 20-0841). The documents supporting those determinations (Board Report No. 20-160 and CF No. 20-0841) are incorporated herein by reference as support for this CEQA determination. On July 22, 2021 the Department of Recreation and Parks (RAP) issued a right-of-entry permit for the operation of the Shelter for a period of three years. This Project continues the existing use of the Tiny Home Village that was built at 11471 Chandler Boulevard, and is currently operating, without substantial change. On November 2, 2023, the RAP Commission determined the Project was exempt under the CEQA and approved the Project (Board Report No. 23-187).

The approximately 75-bed Tiny Home Village will continue to be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to, *Crisis Housing Program for All Populations Scope of Required Services* (LAHSA, 2020-2021). A third-party service provider, e.g., Hope the Mission (Formerly known as Hope of the Valley), will operate the Project for the City, as it has been for the past three years, and it is anticipated that a lease, lease extension, or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

Project operation continues per a security plan consistent with the LAHSA's standards. By creating a stable environment and providing access to basic needs, clients can maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will continue to be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section.

The Project site is on an irregularly shaped parcel with an area of approximately 21,706 square feet. The project is zoned OS with an Open Space land use. The site is a triangular shaped infill parcel located just west of the intersection of Chandler Boulevard and Tujunga Avenue and is bounded on the east by commercial parcels adjacent to Tujunga Avenue, on the south and north by Chandler Boulevard (westbound and eastbound), on the west tapering to a point between Chandler Boulevard east and westbound lanes near Interstate 170 Hollywood Freeway. Parcels that surround the site on the north are zoned commercial with commercial uses and on the south are zoned open space with public institutional uses as a public park; and to the east are parcels zoned commercial with commercial uses (City of Los Angeles Department of City Planning, 2020).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Based on information from the Census and the Los Angeles Homeless Services Authority (LAHSA), in 2022, homeless persons constituted approximately 1.2 percent of the City's population. (U.S Census Bureau, 2022 & LAHSA, 2022)

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabalski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as Emergency Room (ER) visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

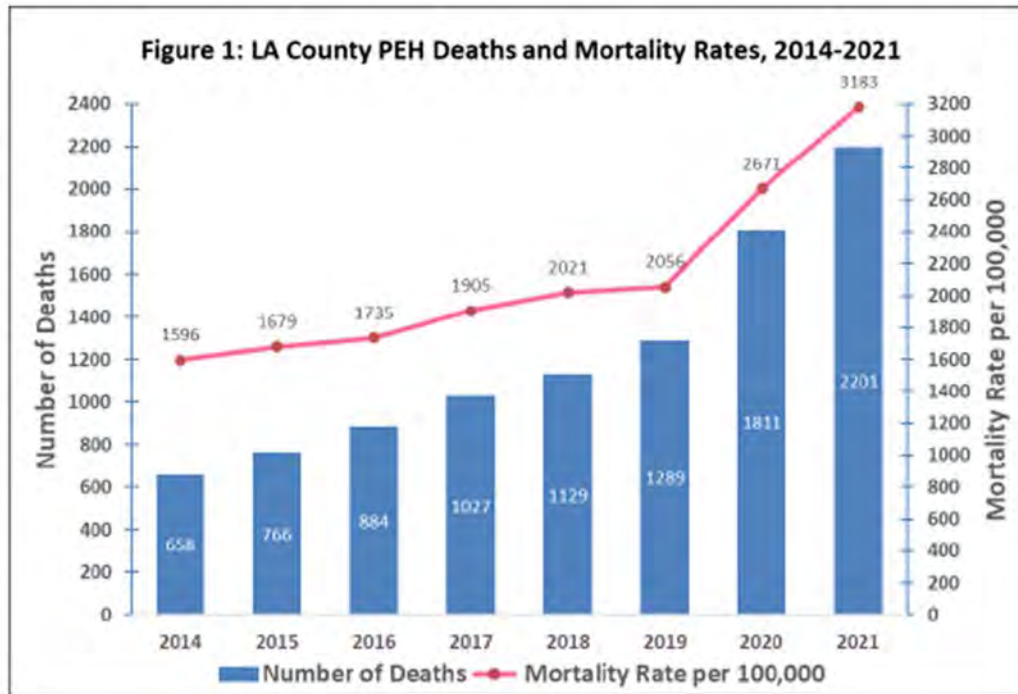
Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*). During the first six months of 2020, LAPD reported 1,738 instances where a homeless individual was a victim of a serious crime including homicide, rape, aggravated assault, burglary, and larceny (LAPD, 2020).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (Commander Dominic H. Choi, 2019). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*). According to the LAPD Use of Force Year-

End Report in 2020, among the 41,290 estimated homeless individuals throughout the City, 7,872 persons were reported to be victims of a violent or property crime. In the same year, 5,722 persons experiencing homelessness were reported as suspects of a violent or property crime. (LAPD, 2020). On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

In May 2023, LA County Department of Public Health released a report on its finding that mortality rates among the homeless population have recently continued to drastically rise from 2,056 per 100,000 people experiencing homelessness in 2019 to 3,183 per 100,000 in 2021. (LAC Department of Public Health, May 2023.) Indicators of mortality in the homeless population "began increasing dramatically beginning in 2020, with the mortality rate increasing by 55% between 2019 and 2021." (LAC Department of Public Health, May 2023.)



(Source: LA County DPH May 2023.)

In a press release dated May 12, 2023, the LA County Board of Supervisors released statements noting “We have declared a state of emergency in Los Angeles County because there are far too many people on our streets” and the report “underscores how important it is that we continue to treat the homelessness crisis with a sense of urgency and move as many people as possible inside so we can begin to save their lives.” (LA County DPH May 12, 2023.)

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released on July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness (LAHSA, 2020). *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released on July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

LAHSA prepared a 2021 shelter point-in-time count for the City of Los Angeles that estimated the number and demographic characteristics of the sheltered homeless population on a single night in January 2021. Released on July 20, 2021, it shows that the homelessness emergency in the City of Los Angeles continues and uncertain. The documented number of individuals experiencing sheltered homelessness increased yet again, as shown in *Table 4 - 2021 Housing Inventory Count and Shelter Count Data Summary* (LAHSA, 2021). The 2021 unsheltered street count could not be conducted due to the COVID-19 pandemic. However, the availability of vaccinations enabled the resumption of the Homeless Count for February 2022 with appropriate precautions (LAHSA, 2022).

Table 4 2021 Housing Inventory Count and Shelter Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	12,503	1% Increase

LAHSA published its 2022 Homeless Count, released on September 7, 2022, which shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing sheltered homelessness dramatically increased yet again, while the documented number of unsheltered homelessness indicated a slight decrease as shown in *Table 5 - 2022 Homeless Count Data Summary* (LAHSA, 2022).

Table 5 2022 Homeless Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	13,522	8.72% Increase
Unsheltered Homeless	28,458	1.37% Decrease
Total Homeless Persons	41,980	1.67% Increase

LAHSA published its 2023 Homeless Count, released on June 29, 2023, which shows that the homelessness emergency in the City of Los Angeles continues. The documented number of individuals experiencing sheltered homelessness dramatically increased, while the documented number of unsheltered homelessness indicated a slight increase as shown in *Table 6 - 2023 Homeless Count Data Summary* (LAHSA, 2023).

Table 6 2023 Homeless Count Data Summary		
	Number of Individuals	Change from 2022
Sheltered Homeless	13,580	0.43% Increase
Unsheltered Homeless	32,680	14.84% Increase
Total Homeless Persons	46,260	10.2% Increase

Taken together, the unexpected and dramatic increase in homelessness, exacerbated by the COVID-19 pandemic, is an emergency in the City of Los Angeles. This situation presents documented dangers to health, life, and property and a burden on, and loss of access to, essential public services, which presents an emergency as defined by CEQA as explained below.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of PRC Section 21080.27 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter Project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

PRC Section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under PRC Section 21080.27, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the Project’s programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor’s safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA’s Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case

Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event

of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem-solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. “Low Barrier” means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City’s shelters, including this Project, meet these requirements.

The Project provides approximately 75 beds for individuals experiencing homelessness. Participants are allowed to bring their pets to the shelter. The Project has storage pallet for personal possessions. The Project is designed to provide privacy to participants by providing doors and locks in each pallet. Therefore, the project is managed and designed to allow the privacy of participants, which allows for the presence of partners, and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals’ privacy. All of the City’s emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is “low barrier” within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under PRC Section 21080.27, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing the necessary follow-up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA’s Scope of Required Services.

The Housing Stability Plan is the family or individual’s service plan that summarizes the participant’s housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case

managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the

coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating service appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destinations through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services;

housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under PRC Section 21080.27

The project is zoned OS with an Open Space land use, which is an on-residential zone that allows for multifamily uses under certain circumstances. (City of Los Angeles Department of City Planning, 2020). The Project site is also qualified as an infill site location because the site is currently developed with a bridge housing facility, and at least 75% of the perimeter of the site is surrounded by qualified urban uses. Commercial uses are located to the north and east, open space with public institutional uses, a public park to the south; and a transportation use, the Hollywood Freeway to the west. The Project site is in a qualified location under PRC Section 21080.27. (City of Los Angeles Department of City Planning, 2023)

5. The Project Involves Qualified Funding Under PRC Section 21080.27

PRC Section 21080.27(a)(2)(A)-(D), exempts emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. Construction funds for this project included Homeless Emergency Aid Program (HEAP) funds. Because the Project is partly funded by a qualified funding source under PRC Section 21080.27(a)(2)(A), the funding requirement is met.

6. The City's Actions Qualify under PRC Section 21080.27 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

PRC Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves a lease or other agreement, and continued operation of an existing bridge housing. The City will provide funding and enter into contracts with a qualified service provider, e.g., PATH, and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in

furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under PRC Section 21080.27.

7. PRC Section 21080.27 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to PRC Section 21080.27.

B. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

PRC Section 21080(b)(4) provides that CEQA does not apply to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

On December 12, 2022, City of Los Angeles Mayor Bass declared a homelessness emergency in the City of Los Angeles. She specifically stated that she “declare[s] the existence of a local emergency and direct[s] all Divisions of the Emergency Operations Organization (EOO) and all other City Departments to take necessary steps for the protection of life, health and safety in the City of Los Angeles.” (City of Los Angeles, Dec. 12, 2022.) The Mayor’s declaration discussed how the homelessness crisis created a dramatic unanticipated impact on the population, and how it displaced people even greater than major hurricanes and earthquake events, all of which are emergencies requiring prompt action to avoid clear and imminent danger to the displaced populations. The City Council ratified the declaration. (CF No. 22-1545.)

On July 7, 2023, Mayor Bass, again, declared a local housing and homelessness emergency because “the City still finds itself in an emergency” with emergency conditions continuing to require prompt abatement due to the severe shortage of beds available to the unhoused population. (City of Los Angeles July 7, 2023.) The Mayor noted the City “is acting with urgency” to provide shelter for the homeless, and she “declare[d] the existence of a local emergency on affordable housing and homelessness and direct[ed] all City Departments to take necessary steps for protection of life, health and safety in the City of Los Angeles.” (City of Los Angeles, July 7, 2023.) In a press release, the Mayor added “It’s no secret that Los Angeles is facing an emergency when it comes to homelessness. This is an issue of life and death for the thousands of people who are living in tents and cars. That’s why I signed an updated declaration of emergency and have continued to lock arms with the City Council to maintain our momentum toward confronting homelessness and building more affordable housing.” (City of Los Angeles, July 10, 2023.)

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, also adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The dramatic rise in the homeless population is a sudden unexpected occurrence, as is the unexpected and sudden occurrence of losing access to adequate shelter and essential services for each individual newly experiencing homelessness, as is the unexpected rise in mortality rates among the homeless population since 2019. Each is an emergency presenting impending acute harm to the individuals experiencing homelessness that would be prevented and mitigated through providing housing to those individuals, including through the emergency shelter provided by this Project. The Project, therefore, is exempt from CEQA environmental review pursuant to PRC Section 21080(b)(4), since it prevents and mitigates such imminent loss and damage.

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RMM Decl.
Exhibit 60

RMM Decl.
Exhibit 60

HOLLY L. WOLCOTT
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER

City of Los Angeles
CALIFORNIA



ERIC GARCETTI
MAYOR

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213) 978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER

CLERK.LACITY.ORG

When making inquiries relative to
this matter, please refer to the
Council File No.: [19-0877](#)

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

December 11, 2019

Council File No.: [19-0877](#)

Council Meeting Date: December 10, 2019

Agenda Item No.: 52

Agenda Description: STATUTORY EXEMPTION and COMMUNICATION FROM THE LOS ANGELES HOUSING AND COMMUNITY INVESTMENT DEPARTMENT relative to a new lease with the Young Women's Christian Association of Greater Los Angeles for the Crisis and Bridge Housing facility located at 1215 North Lodi Place.

Council Action: COMMUNICATION FROM THE LOS ANGELES HOUSING AND COMMUNITY INVESTMENT DEPARTMENT - ADOPTED AS AMENDED FORTHWITH BY MOTION 52A (O'FARRELL - KREKORIAN)

Council Vote:	YES	BOB BLUMENFIELD
	YES	MIKE BONIN
	YES	JOE BUSCAINO
	YES	GILBERT A. CEDILLO
	YES	MARQUEECE HARRIS-DAWSON
	YES	JOSE HUIZAR
	YES	PAUL KORETZ
	YES	PAUL KREKORIAN
	YES	JOHN LEE
	YES	NURY MARTINEZ
	YES	MITCH O'FARRELL
	ABSENT	CURREN D. PRICE
	YES	MONICA RODRIGUEZ
	YES	DAVID RYU
	YES	HERB WESSON

HOLLY L. WOLCOTT
CITY CLERK

Adopted Report(s)

Title	Date
Amending Motion	12/10/2019
Report from Public Works: Engineering	11/27/2019
Report from Municipal Facilities Committee	11/27/2019

ITEM No. 52 - A

MOTION

I MOVE that the matter of the Statutory Exemption and Communications from the Bureau of Engineering and Municipal Facilities Committee relative to a new lease with the Young Women's Christian Association of Greater Los Angeles for the Crisis and Bridge Housing facility located at 1215 North Lodi Place, item No. 52 on today's agenda (CF No. 19-0877), **BE AMENDED** to DETERMINE that the Crisis and Bridge Housing facility located at 1215 North Lodi Place, which allows the lease of the property, *minor alterations*, and use as a temporary shelter for those experiencing homelessness, is statutorily exempt under Public Resources Code Sections 21080.27 for City of Los Angeles bridge homeless shelters, and Section 21080(b)(4) as a specific action to mitigate an emergency as reflected also in California Environmental Quality Act Guidelines Section 15269(c).

PRESENTED BY: 

MITCH O'FARRELL

Councilmember, 13th District

SECONDED BY: 

CRIGG

December 10, 2019

jwd



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GARY LEE MOORE, PE, ENV SP
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1149 S. BROADWAY, SUITE 700
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<http://eng.lacity.org>

November 27, 2019

The Honorable Herb J. Wesson, Jr.
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

**CRISIS AND BRIDGE HOUSING FACILITY AT 1215 N. LODI PL (19-0877) CALIFORNIA
ENVIRONMENTAL QUALITY ACT (CEQA) NOTICE OF EXEMPTION (NOE)**

Dear President Wesson and Honorable Members:

On August 21, 2019, a motion was introduced, instructing City staff to evaluate and report on the feasibility of a lease agreement with the Young Women's Christian Association (YWCA) and a sub-lease with a service provider, possibly the current provider People Assisting the Homeless (PATH), to operate a bridge housing facility on the property located at 1215 N. Lodi Place. The site currently accommodates a bridge housing facility with 64 beds. The expanded facility will accommodate approximately 60 additional beds for an approximate total of 124 beds.

RECOMMENDATION

Staff recommends that Council determine the Crisis and Bridge Housing facility on 1215 N. Lodi Place, which allows the lease of the property and use as temporary shelter for those experiencing homelessness, is statutorily exempt under Public Resources Code Sections 21080.27 for City of Los Angeles bridge homeless shelters and 21080(b)(4) as a specific action to mitigate an emergency as reflected also in State CEQA Guidelines 15269(c). Please refer to the attached NOE.

If you have any questions, please contact Allan Kawaguchi at (213) 485-4687.

Sincerely,

Gary Lee Moore, PE, ENV SP
City Engineer

GLM/AK/mem

Q:\DW\Word\Transmittal CF 19-0877 CD13 1215 Lodi PI BH - CEQA NOE

cc: Deborah Weintraub, Bureau of Engineering
Alfred Mata, Bureau of Engineering
Maria Martin, Bureau of Engineering



OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III – City CEQA Guidelines)

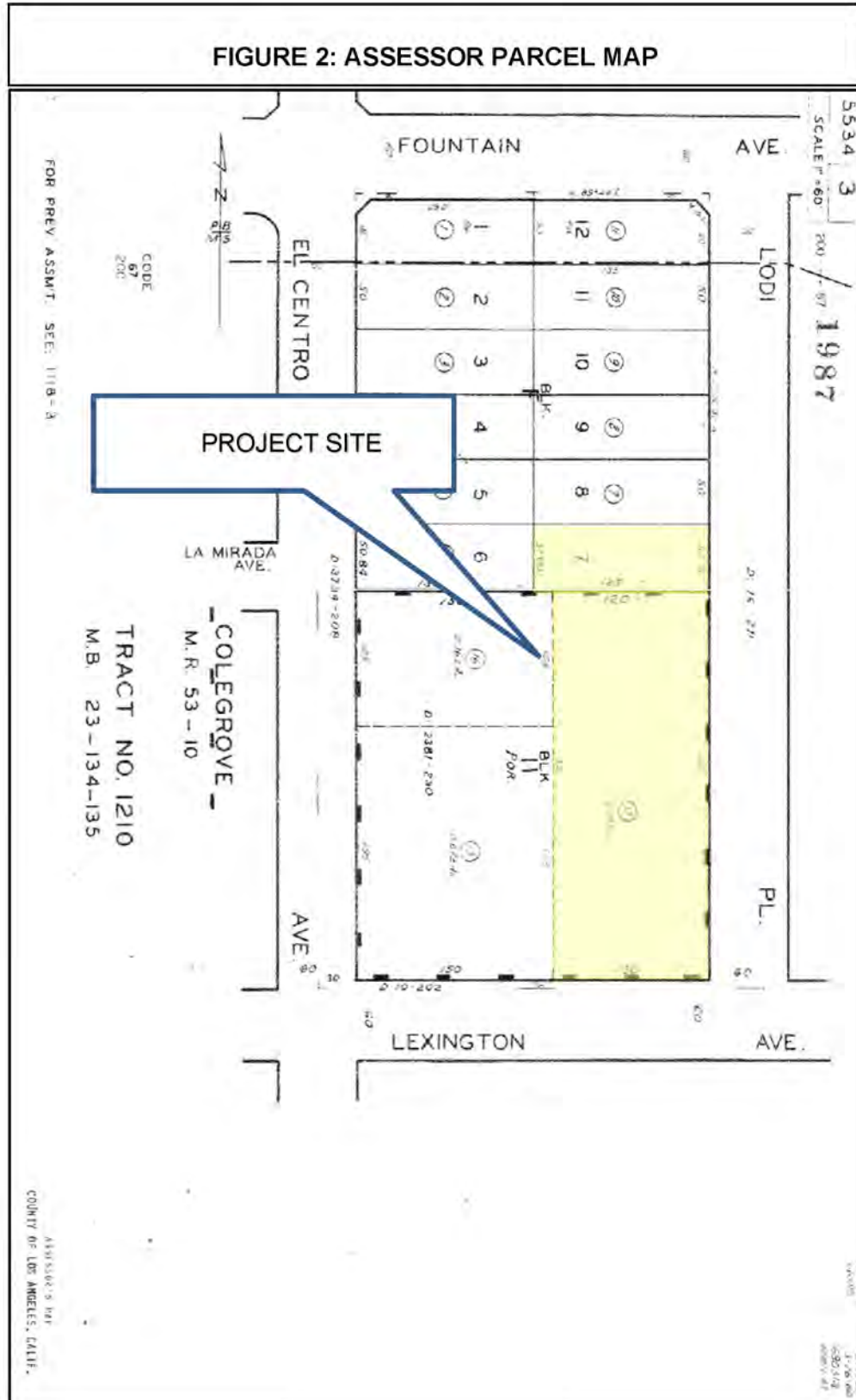
This form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, and the Office of Planning and Research pursuant to Public Resources Code Sections 21080.27(c) and 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, MS 939, Los Angeles, CA 90015		COUNCIL DISTRICT 13	
PROJECT TITLE: CD 13 1215 Lodi Place Bridge Housing Facility		LOG REFERENCE C.F. No. 19-0877	
PROJECT LOCATION: 1215 N. Lodi Place, Los Angeles, CA		T.G. 593 F5	
DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The project site is the historic Hollywood Studio Club property owned by the Young Women's Christian Association (YWCA). The project consists of a new lease agreement between the City of Los Angeles (the City) and the YWCA, minor alterations to accommodate approximately 60 additional beds (in addition to 64 existing beds) and to make the first floor Americans with Disabilities Act (ADA) compliant, and operation of a temporary homeless shelter, with approximately 124 beds total, that will provide emergency shelter, hygiene, storage, food services and case management to individuals experiencing homelessness. The nature of this project is to serve the local homeless community within the vicinity of the project. The purpose of the project is to provide emergency shelter for the homeless to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The project site is located in the Hollywood Community Plan Area in the City of Los Angeles, Council District 13 (CD 13), 1215 N. Lodi Place, Assessor Parcel Number (APN) 5534-003-017, see <i>Figure 1 – Project Site Location and Figure 2 – Assessor Parcel Map</i> .			
The project site is developed with a three-story building which is partly occupied by a YWCA job training program and print center and a bridge housing site that currently includes 64 beds. Parking is available on site. The City will lease approximately 31,400 square feet (sf) of the building for approximately three years. The lease will include a sub-lease with a service provider, possibly the current service provider People Assisting the Homeless (PATH). Project beneficiaries include the homeless community, the public and local businesses. Standard conditions, including a construction management plan incorporated into the project design, will apply. Project beneficiaries include the homeless community, the public and local businesses. (Please see the attached narrative for more details).			
On _____, the City Council determined this action was exempt from CEQA and approved the project.			
CONTACT PERSON: Maria Martin		TELEPHONE NUMBER: 213-485-5753	
EXEMPT STATUS: (Check One)			
<input checked="" type="checkbox"/> STATUTORY		<div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> <u>CITY CEQA GUIDELINES</u> </div> <div style="text-align: center;"> <u>STATE CEQA GUIDELINES</u> </div> <div style="text-align: center;"> <u>CA PUBLIC RESOURCE CODE</u> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div></div> <div style="text-align: center;">15269(c)</div> <div style="text-align: center;">21080.27 & 21080(b)(4)</div> </div>	
JUSTIFICATION FOR PROJECT EXEMPTION: This project is statutorily exempt under Public Resources Code Sections 21080.27 for City of Los Angeles bridge homeless shelters, and 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in State CEQA Guideline Section 15269(c) (see attached narrative).			
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING			
SIGNATURE: <div style="text-align: center;">Maria Martin</div>		TITLE: Environmental Affairs Officer Environmental Management Group	
DATE:		DATE:	
FEE: \$75.00 _____	RECEIPT NO.	REC'D BY	DATE

DISTRIBUTION: (1) County Clerk (2) City Clerk (3) Agency Record

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FIGURE 2: ASSESSOR PARCEL MAP



EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The project site is zoned RD1.5-1XL with a Low Medium II Residential land use. The site is located northwest of the intersection of Lodi Place and Lexington Avenue. The site is developed with a historic three-story building known as the YWCA Hollywood Studio Club (or Hollywood Studio Club), a landscaped courtyard, and surface parking lot with fencing, security lighting, and landscaping. A basketball pole and hoop and some bleachers are located within on the parking lot. A bridge housing site with 64 beds has been operating at this site since November 2018.

Parcels that surround the site on the north, south, and west are zoned for Low Medium II Residential land uses. Parcels to the east are zoned for Medium Residential uses. The project site is located within a rectangular shaped parcel with an area of approximately 0.98 acres. The project site is in a Transit Priority Area and is generally bounded by Lexington Avenue to the south, Lodi Place to the east, and multiple family residences to the north and west. Lexington Avenue and Lodi place are designated local streets in the City of Los Angeles Mobility Plan (2035).

The closest transit stop is to the east of the project site is located on Lexington Avenue and Gower Street is for the Hollywood/Wilshire DASH which provides access to and from Hollywood Boulevard and Wilshire Boulevard. Regional transit access to and from the site to Santa Monica and Downtown Los Angeles is via METRO buses (Lines 4 and 704) at Santa Monica Boulevard and from the Hollywood/Vine Station to South Bay via METRO bus (Line 210). The project is consistent with the Los Angeles Municipal Code and the City of Los Angeles General Plan (General Plan) and will not significantly impact environmental resources.

A portion of the first floor and the second and third floors will be leased by the City of Los Angeles and operated as a temporary bridge home by a City vendor, potentially People Assisting the Homeless. The project includes approximately 60 new beds, approximately 30 for transition age youth (TAY) (18 to 24 years old) and 30 for adult women. Full staff will be onsite during daytime operational hours to provide services. The site will be continuously staffed, 24 hours a day, with security personnel, and provided with security directional lighting.

Standard conditions, including a construction management plan incorporated into the project design, will apply. The project includes minor tenant and ADA compliance, limited to the first floor, improvements and will not significantly impact environmental resources.

Unless otherwise stated, the proposed project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards including but not limited to:

- Los Angeles Municipal Code
- Bureau of Engineering Standard Plans
- Standard Specifications for Public Works Construction
- Work Area Traffic Control Handbook
- Additions and Amendments to the Standard Specifications for Public Works Construction

The project will be operated pursuant to standard conditions for emergency shelters in the City's A Bridge Home program, which requires that the contracts for operating the project with service providers comply with Los Angeles Homeless Services Authority (LAHSA's) shelter program requirements, such as LAHSA's Bridge Housing Program Scope of Required Services and

LAHSA's Program Standards. These requirements include all of the requirements in Government Code sections 65660 and 65662 for being a Low Barrier Navigation Center. These operational requirements are discussed in more detail in the following sections of this document.

II. PROJECT HISTORY

The Hollywood Studio Club was designed by Architect Julia Morgan in a Mediterranean style and was built in 1925. The site was designated City of Los Angeles Historic Cultural Monument (HCM) LA-175 in 1977 and added to the National Register of Historic Places November 25, 1980.

The presence of the unsheltered homeless population and their homeless encampments has increased over the prior year by 16% in the City of Los Angeles. As shown on *Table 3 - 2019 Homeless Count Data Summary*, Total Homeless Persons increased 19% in the same period and Sheltered Homeless increased 5%. Some areas of the city have seen negative effects to access of public places, access routes; and businesses have been hindered. There are a growing number of support services to help the homeless find their way off the streets, however, more shelter and services are needed.

The August 2, 2019 homeless data prepared by LAHSA for the Hollywood Community, see Table 1, 2019 Homeless Population Count – Hollywood, documents a significant homeless population increase presenting a danger to health, life, public safety and undue burden on essential public services as detailed further below.

Table 1 2019 Homeless Population Count - Hollywood				
Homeless Population	Sheltered	Unsheltered	Total	Percent Change 2018-19
All Persons	252	2,815	3,067	+82%
Female	89	662	751	+68%

This Bridge Home homeless shelter project is designed to mitigate the impacts caused by the spike in homelessness. The 2019 increase in City homelessness was both sudden and unexpected. Prior to June 2019, homelessness had been decreasing following County and City efforts, showing that the June 2019 dramatic increase in homeless persons was both unexpected and sudden.

The dramatic increase in homelessness identified in June 2019 and the attendant significant adverse public health, safety, and welfare impacts that are associated with homelessness will be exacerbated if these homeless shelter projects are delayed. Homeless populations themselves suffer from adverse health impacts greater than the non-homeless population, including greater risk of death. Homeless individuals impose outsized impacts upon and use public safety and public health resources compared to the general population. The dramatic increase of the already large Los Angeles-area homeless population shows that this situation meets the definition of an emergency because it presents a clear and imminent danger that demands immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services. This Bridge Home project is needed to mitigate the unexpected and dramatic surge in homelessness in the City of Los Angeles.

III. THE PROJECT IS EXEMPT FROM CEQA BASED ON A STATUTORY EXEMPTION IN PUBLIC RESOURCES CODE SECTION 21080.27 APPLICABLE TO BRIDGE HOMELESS EMERGENCY SHELTER PROJECTS LOCATED IN THE CITY OF LOS ANGELES

Assembly Bill 1197 (AB 1197) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the project is exempt from CEQA pursuant to AB 1197 (Pub. Resources Code, section 21080.27).

A. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles (the City) City Council has declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (Council File No. 15-1138-S33), which is currently in effect (Council File No. 15-1138-S40 [June 14, 2019]).

B. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

AB 1197 is an urgency statute that is necessary for the immediate preservation of public peace, health and safety that addresses the unique circumstances faced by the City of Los Angeles and allows for the expeditious development of emergency shelters. The intent of AB 1197 is to help the City address its homeless crisis by developing emergency shelters pursuant to the crisis declaration. The City builds these emergency shelters pursuant to its “A Bridge Home” program.

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.”

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.” This project provides temporary housing through the development and operation of a shelter, with case managers staffing the facility that provide connections to these homeless services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the project’s programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both participants and providers, and helps participants rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor’s safety, choice, and control. Trauma Informed Services

create a culture of nonviolence, learning, and collaboration.

The A Bridge Home program shelters are operated by service providers coordinated with LAHSA. The intention of this emergency A Bridge Home project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's 2018-2019 Bridge Housing Scope of Required Services (SRS), service providers that oversee an A Bridge Home shelter must provide case management services and develop a Housing Stability Plan with each participant. A Bridge Home program implements a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the participant to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to participants through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect participants to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay in the Bridge Housing bed.

HFCMSS connects participants to a Housing Navigator who assists participants to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to a participant when the participant enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists participants with Housing Navigation services. Housing Navigation services are available to participants to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days of the A Bridge Home stay. Housing Navigation services may be provided onsite and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with participants are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating participants on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's 2018-2019 Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First"

means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting homeless people to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

“Housing First” also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. For time-limited, supportive services programs serving homeless youth, programs should use a positive youth development model and be culturally competent to serve unaccompanied youth under 25 years of age. Providers should work with the youth to engage in family reunification efforts, where appropriate and when in the best interest of the youth. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance.

Although time-limited rental and supportive services programs may not be applicable to the City’s shelters, the overall continuum of care addressing those aspects of Housing First use family reunification and positive youth development among the strategies to address the unique needs of unaccompanied homeless youth. Regardless, the shelters provide a strengths-based approach through LAHSA’s scope of required services, which complies with the positive youth development model by assisting participants to identify their own strengths, develop coping skills, and build resiliency. The shelters, including this project, also provide initial efforts as required by LAHSA’s Scope of Required Services for family reunification by requiring that the first conversation upon entry should be to assess for the possibility of diversion so as to assist the person self-resolve their housing and/or make reasonable efforts to re-connect with supportive family and/or friends who could temporarily or permanently house the participant, rather than reside in the Bridge Housing. If resources are needed to successfully divert a person from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the participant while residing in Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting participants to exit to safe and stable housing. Thus, the goals in the Housing First statute related to homeless youth programs are met to the extent applicable.

This project additionally meets the other above-noted Housing First requirements. The A Bridge Home program shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA’s Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA’s 2018-2019 Program Standards, all eligible participants are to be served with a Housing First approach. The basic underlying principle of LAHSA’s System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Participants will not be rejected or exited from participation in Bridge Housing due to any unnecessary barriers.

The City’s A Bridge Home program is intended to be a Housing First program focused on quickly moving people experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that persons are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City’s shelters developed under the A Bridge Home program, including this emergency shelter project, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24)

hour residence to help people who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this project, are primarily focused on connecting, transitioning, and referring homeless people into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency "A Bridge Home" shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this project, are never mandatory and cannot be a condition of obtaining the housing intervention. This project will provide temporary housing, case managers and Housing Navigators staffed at the facility who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, and may include but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this project, meet these requirements.

This project is population-specific, serving women and transition age youth (18 to 24).

The site has a landscaped courtyard area and landscaped areas on the parking lot. Currently, the site has no designated pet relief area. However, the facility allows for pets and potential areas for a future designated area are available. Based on need, a specific pet relief area may be designated in the future. Homeless persons may choose not to seek bridge housing or shelter, even on the coldest nights, if they aren't able to find shelter for both themselves and their pet. Therefore, by allowing pets, the facility removes this issue from becoming a barrier to participants.

Another concern that may pose a barrier to seeking or entering a facility is a concern for loss of personal belongings due to lack of storage space. The project provides for storage of personal belongings and is designed to provide privacy to participants. The facility is set up with two beds in a private room with wardrobe cabinetry. Most of the rooms are furnished with two beds, only one or two rooms accommodate three beds. Therefore, the project is managed and designed to allow for the privacy of participants.

The project uses low barrier best practices that reduce barriers to entry. These practices include pet friendly facilities, harm reduction storage areas for possessions, and management and design for individuals' privacy. All of the City's Bridge Home program emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

C. The Project Meets the Requirements of Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government

Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect people to permanent housing through a services plan that identifies services staffing. This project meets that requirement. As noted above, the project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the participant's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the participant right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the person's situation changes and steps are completed or revised accordingly.

Participants are assisted with a range of activities that address the stated goals of the participant in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect people to permanent housing. This is

required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's A Bridge Home program collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. A Bridge Home case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The A Bridge Home program collaborates with Los Angeles County Case Entry system Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's A Bridge Home shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's A Bridge Home emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless people. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and LAHSA to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Participants' Housing Stability Plans are tracked in a Homeless Management Information System

(HMIS) along with the date of completion. Case managers complete a Monthly Update with the participant to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked and information are provided to participants in HMIS with the goal of the participant achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the project meets the HMIS requirements. In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the project meets the requirements set forth in Government Code Section 65662.

D. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (Public Resources Code section 21080.27(a)(2).) As noted in the communication provided by the City's Planning Department on November 27, 2019, the project site is considered a qualified site because the site is on a site that is zoned for multifamily residential use and has been previously developed for residential use.

The project site is located on an approximately 0.98-acre parcel northwest of the intersection of Lodi Place and Lexington Avenue. The site is developed with the YWCA Hollywood Studio Club, which has traditionally been used for multifamily residential uses and is surrounded by multifamily residential uses. Thus, the project qualifies as an infill site under AB 1197 CEQA exemption because the site has been previously developed with a residential use, and it is surrounded by developed residential uses. The site is zoned for Low Medium II residential use (which allows 18-29 dwelling units/net acre) and is a qualified use. The Department of City Planning has determined that the project is considered a qualified location under AB 1197.

E. The Project Involves Qualified Funding Under AB 1197

Public Resources Code Section 21080.27(a)(2)(A)-(D) exempts emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. Funding for the project is from Homeless Emergency Aid program and a reserve fund loan that will be reimbursed through State of California Homeless Housing, Assistance and Prevention Program grant receipts. Therefore, the project is consistent with the funding requirements of AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement under AB 1197 is met.

F. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

Public Resources Code Section 21080.27(b)(1), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This project involves an emergency shelter, as described above, which is located in the City of Los Angeles. The City will be leasing the emergency shelter site for this project, conducting minor alterations, and approving funding and contracts for the operation of the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

G. The Project Involves an Eligible Public Agency taking a Qualified Action under AB 1197

Public Resources Code Section 21080.27(b)(2), exempts from CEQA certain activities by specified Eligible Public Agencies. The Eligible Public Agencies are, as follows: (A) The County

of Los Angeles; (B) The Los Angeles Unified School District; (C) The Los Angeles County Metropolitan Transportation Authority; (D) The Housing Authority of the City of Los Angeles; (E) The Los Angeles Homeless Services Authority; (F) The Los Angeles Community College District; (G) The successor agency for the former Community Redevelopment Agency of the City of Los Angeles; (H) The Department of Transportation; and (I) The Department of Parks and Recreation. AB 1197 exempts “any action by an eligible public agency to lease, convey, or encumber land owned by that agency, or to any action taken by an eligible public agency to facilitate the lease, conveyance, or encumbrance of land owned by that agency, or to any action taken by an eligible public agency in providing financial assistance, in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles.”

The County of Los Angeles will provide some funding. As noted above, this action is exempt under AB 1197 because the county is an eligible public agency and providing financial assistance in furtherance of providing emergency shelters in the City of Los Angeles is an exempt activity under AB 1197 (Public Resources Code Section 21080.27(b)(2)).

H. Conclusion

Based on the above-noted information, the project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

IV. THE PROJECT IS EXEMPT FROM CEQA BASED ON STATUTORY EMERGENCY EXEMPTION

A. Emergency CEQA Statutory Exemption

Public Resources Code section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (the CEQA Guidelines) section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply
 - (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or
 - (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already

dangerously large homeless population. The project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately .0078 percent of the City's population (Reference 13).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (Reference 14). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Reference 15).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Reference 16). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Reference 17).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Reference 18) This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, but is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Reference 19). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

[M]ortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. [¶] A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths.

(References 29 & 30.)

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Reference 20). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Reference 21). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Reference 22).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Reference 23). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Reference 24).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Reference 25).

C. Unexpected and Sudden Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Reference 26). The

impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led to adoption of AB 1197, an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

Among other responses to homelessness, on April 17, 2018 the Mayor and City Council of the City of Los Angeles declared a Homeless shelter crisis (Reference 27). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a four percent overall decrease in the number of persons experiencing homelessness in LA County (Reference 28).

Table 2 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary at Reference 28.

Table 2 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these ongoing efforts and the initial progress shown in 2018, the 2019 Homeless Count, released in June 2019, unexpectedly has documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in Reference 28 *Table 3 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Reference 28:

Table 3 2019 Homeless Count Data Summary		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	5% Increase
Unsheltered Homeless	27,221	19% Increase
Total Homeless Persons	36,165	16% Increase

The unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified in 2019, and attendant identified dangers to health, life, property and burden on public

resources present an emergency situation as defined by CEQA.

D. The Project is Exempt from CEQA Because it is Designed to Mitigate an Emergency

Homelessness, as documented above, itself presents a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services, meeting the definition of emergency provided by Public Resources Code section 21060.3. Homeless populations themselves suffer from adverse health impacts greater than the non-homeless population, including greater risk of death. Homeless individuals impose outsized impacts upon and use public safety and public health resources compared to the general population. The project is designed to mitigate all of these dangers.

The 2019 increase in homelessness in the City was both sudden and unexpected, further meeting the CEQA definition of an emergency set forth at Section 21060.3. Prior to June 2019, homelessness had been decreasing following County and City efforts, showing that the June 2019 dramatic increase in homeless persons was both unexpected and sudden. Moreover, CEQA Guideline section 15269(c) clarifies that a project to prevent a future emergency – such as the project which is designed to mitigate the impacts caused by the spike in homelessness -- need not be sudden or unexpected to qualify as statutorily exempt from CEQA compliance.

Finally, the fact that Section 21060.3 defines an emergency to include events beyond natural or geologic emergencies such as riots, accidents, or sabotage, shows that the dramatic increase of the already large Los Angeles-area homeless population is the type of emergency exempt from CEQA environmental review. The dramatic increase in homelessness identified in June 2019 and the attendant significant adverse public health, safety, and welfare impacts that are associated with homelessness would also be exacerbated by delaying the project in order to conduct a CEQA environmental review. The City's approval of the project to mitigate the unexpected and dramatic surge in homelessness is the type of emergency situation the legislature intended to fall outside the scope of CEQA review when it adopted Section 21080(b)(4). For these reasons, the project is statutorily exempt from compliance with CEQA as a specific action necessary to prevent or mitigate an emergency.

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RMM Decl.
Exhibit 61

RMM Decl.
Exhibit 61

HOLLY L. WOLCOTT
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER

City of Los Angeles
CALIFORNIA



ERIC GARCETTI
MAYOR

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213) 978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER

CLERK.LACITY.ORG

When making inquiries relative to
this matter, please refer to the
Council File No.: [18-0510](#)

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

November 6, 2019

Council File No.: [18-0510](#)

Council Meeting Date: November 05, 2019

Agenda Item No.: 52

Agenda Description: MOTION (HARRIS-DAWSON for BONIN - BUSCAINO) and RESOLUTION relative to amending Council action of December 11, 2018 regarding Bridge Housing on 100 East Sunset Avenue Project and its exemptions from the California Environmental Quality Act (CEQA).

Council Action: MOTION (HARRIS-DAWSON for BONIN - BUSCAINO) AND RESOLUTION - ADOPTED

Council Vote:

YES	BOB BLUMENFIELD
YES	MIKE BONIN
YES	JOE BUSCAINO
YES	GILBERT A. CEDILLO
YES	MARQUEECE HARRIS-DAWSON
ABSENT	JOSE HUIZAR
YES	PAUL KORETZ
ABSENT	PAUL KREKORIAN
YES	JOHN LEE
YES	NURY MARTINEZ
YES	MITCH O'FARRELL
ABSENT	CURREN D. PRICE
YES	MONICA RODRIGUEZ
YES	DAVID RYU
YES	HERB WESSON

HOLLY L. WOLCOTT
CITY CLERK

Adopted Report(s)

Title
[Motion](#)

Date
10/29/2019

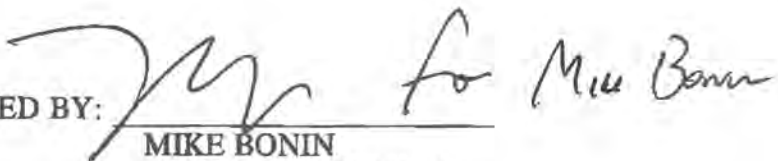
TO CITY CLERK FOR PLACEMENT ON NEXT
REGULAR COUNCIL AGENDA TO BE POSTED

#51

MOTION

I MOVE that the Council Action of December 11, 2018 (CF 18-0510) relative to a determination that the Bridge Housing on 100 E. Sunset Avenue Project (Project), which allows the development and use of the property as a temporary shelter, is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Article 19, Sections 15301, Class 1(b), 15304 Class 4(a)(b)(e), and Class 32; and the City of Los Angeles CEQA Guidelines, Art. III, Sec. 1, Class 1 (2)(12), and Class 4(1)(3)(6), **BE AMENDED** to adopt the attached Resolution which further determines that the Project is additionally exempt from the California Environmental Quality Act under a new exemption that was passed by the California Legislature in September, 2019

PRESENTED BY:

 for Mike Bonin
MIKE BONIN
Councilman, 11th District

SECONDED BY:



ak

OCT 29 2019

ORIGINAL

RESOLUTION

WHEREAS, in April 2018, the City Council of the City of Los Angeles (City) declared an emergency shelter crisis pursuant to Government Code Section 8698 et seq., to enable the construction of temporary emergency shelters on any land owned or leased by the City; and

WHEREAS, in April 2018, Mayor Garcetti announced the City's "A Bridge Home" program aimed at constructing emergency shelters; and

WHEREAS, on December 11, 2018, the City Council approved an emergency homeless shelter under the "A Bridge Home" program located at 100 E. Sunset Avenue in the Venice neighborhood of the City, which is found in Council File No. 18-0510 (Project); and

WHEREAS, The City determined that the Project was exempt from the California Environmental Quality Act (CEQA) pursuant to various provisions of the State CEQA Guidelines (Cal. Code Regs., tit. 14, section 15000 et seq.) and the City's CEQA Guidelines, and filed a Notice of Exemption pursuant to CEQA with the County Clerk for the County of Los Angeles on December 12, 2018; and

WHEREAS, on September 26, 2019, AB 1197 was signed into law, codifying a new statutory exemption from CEQA at Public Resources Code Section 21080.27 for emergency shelters in the City of Los Angeles; and

WHEREAS, Public Resources Code Section 21080.27, subdivision (b), authorizes the City to rely on the new statutory exemption from CEQA for any activity that the City approves or carries out in furtherance of providing emergency shelters in the City; and

WHEREAS, the Project is an emergency shelter pursuant Public Resources Code Section 21080.27, subdivision (a)(2) and qualifies for the statutory exemption from CEQA provided in AB 1197.

NOW, THEREFORE, BE IT RESOLVED, THAT:

1. The Recitals set forth above are true and correct and are incorporated herein by reference.

2. The City's Project is exempt from CEQA pursuant to the AB 1197, which is codified at Public Resources Code, section 21080.27.

3. The determination under this Resolution that the Project is exempt from CEQA does not disturb any of the previous approvals related to the Project in any way, including but not limited to the project approval by City Council on December 11, 2018, and the approval of the lease on June 25, 2019, which remain in full force and effect without any change.

**BOARD OF PUBLIC WORKS
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CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

**DEPARTMENT OF
PUBLIC WORKS**

**BUREAU OF
ENGINEERING**

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

October 31, 2019

The Honorable Herb J. Wesson, Jr.
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

**BRIDGE HOUSING FACILITY 100 E. SUNSET AVENUE (CF 18-0510) CALIFORNIA
ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION (NOE)**

Dear President Wesson and Honorable Members:

On June 29, 2018, the City Council (Council) adopted a report from the Homelessness and Poverty Committee, dated June 20, 2018, relative to the evaluation of development on the above-referenced property for the temporary use as bridge housing for those experiencing homelessness. On December 11, 2018, Council determined the project was categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Article 19, Sections 15301, Class 1(b), 15304 Class 4(a)(b)(e), and Class 32; and the City of Los Angeles CEQA Guidelines, Art. III, Sec. 1, Class 1 (2)(12), and Class 4(1)(3)(6). On September 26, 2019, a new exemption, California Public Resources Code, Section 21080.27, was signed into law.

RECOMMENDATION

Staff recommends that Council determine the Crisis and Bridge Housing facility on 100 E. Sunset Avenue, which allows the development and lease of the property as temporary shelter for those experiencing homelessness, is statutorily exempt under the new exemption, Public Resources Code, Section 21080.27, which was signed into law on September 26, 2019. Please refer to the attached NOE.

If you have any questions, please contact Allan Kawaguchi at (213) 485-4687.

Sincerely,

For Gary Lee Moore, PE, ENV SP
City Engineer

GLM/AK/mem

Q:\AM\Word\Transmittal to Council CD 11 100 E Sunset CEQA NOE



CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III – City CEQA Guidelines)

This form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, and the Office of Planning and Research pursuant to Public Resources Code Sections 21080.27(c) and 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering, 1149 S. Broadway, MS 939, Los Angeles, CA 90015	COUNCIL DISTRICT 11
PROJECT TITLE: Bridge Housing on 100 E Sunset Avenue	LOG REFERENCE CF 18-0510

PROJECT LOCATION: 100 E Sunset Avenue, Venice CA 90293, Assessor's Parcel Number 4286-015-900, T.G.671 G5

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT

This Notice of Exemption is being filed for the purpose of providing notice required by Public Resources Code Section 21080.27, subd. (c). As identified in the previous approval by City Council on December 11, 2018, the project involves constructing a temporary homeless emergency shelter with tent, trailer, and outdoor uses on a Los Angeles County Metropolitan Transportation Authority-owned parcel leased by the City and operated by the City through Los Angeles Homeless Services Authority or another vendor. (See prior project approval at City Council File No. 18-0510 (Project).)

The prior City Council Action on December 11, 2018 (CF 18-0510) determined the project was categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Article 19, Sections 15301, Class 1(b), 15304 Class 4(a)(b)(e), and Class 32; and the City of Los Angeles CEQA Guidelines, Art. III, Sec. 1, Class 1 (2)(12), and Class 4(1)(3)(6).

On _____, City Council adopted a motion amending the prior action to adopt a resolution which further determined that the Project is additionally exempt from the California Environmental Quality Act under a new exemption, Public Resources Code, Section 21080.27, which was signed into law on September 26, 2019.

CONTACT PERSON: Maria Martin		TELEPHONE NUMBER: 213-485-5753	
EXEMPT STATUS: (Check One)	<u>CITY CEQA</u>	<u>STATE CEQA</u>	<u>CA PUBLIC</u>
<input checked="" type="checkbox"/> STATUTORY	<u>GUIDELINES</u>	<u>GUIDELINES</u>	<u>RESOURCES CODE</u>
			21080.27

JUSTIFICATION FOR PROJECT EXEMPTION: This project is statutorily exempt under Public Resources Code Sections 21080.27, see attached narrative, which is alternatively provided in the City's Council File No. 18-0510.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Group	DATE:
FEE: \$75.00 _____	RECEIPT NO.	REC'D BY
		DATE

DISTRIBUTION: (1) County Clerk (2) City Clerk (3) Agency Record

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REVISED CATEGORICAL EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION

This Notice of Exemption document is prepared for the purpose of providing notice required by Public Resources Code Section 21080.27, subd. (c). This emergency shelter project was previously approved by the City Council on December 11, 2018, and a Notice of Exemption was filed with the County Clerk on December 12, 2018, which noted the project was exempt under CEQA Guidelines Sections 15301(b), 15304(a)(b)(e), and Class 32, City of Los Angeles CEQA Guidelines, Classes 1(2)(12) and 4(1)(3)(6). The Notice of Exemption and narrative are prepared for the consideration of a motion to amend the prior project approval action by adopting a Resolution determining the project was additionally exempt from CEQA pursuant to Public Resources Code Section 21080.27 [AB 1197], which was signed into law on September 26, 2019. The resolution does not change any of the prior approvals or determinations in any way.

As identified in the previous approvals by City Council on December 11, 2018 (Council File No. 18-0510), the following project description was provided for this emergency shelter project:

The project is a temporary homeless shelter that will operate for up to 3 years and will provide emergency shelter, hygiene, storage, food services and case management to homeless individuals. The site property is located within the Venice Community Plan Area of the City of Los Angeles in Council District 11 (CD 11) 100 East Sunset Avenue, Venice, CA, 90291, Assessor's Parcel Number (APN) 4286-015-900, as shown in *Figure 1 - Project Location Map* and *Figure 2 – Assessor's Parcel Map* (Reference 1).

The project design plan includes a new single-story 9,900 square-foot modular tent structure, nine youth trailers that total 6,480 square feet, on a Los Angeles County Metropolitan Transportation Authority (Metro) owned parcel that includes one (1) lot. The lot totals approximately 130,505 square feet. The project design includes up to 100 beds within the tented area, 54 beds within the youth trailers, an approximately 840- square-foot hygiene trailer, an approximately 840-square-foot youth hygiene trailer, 1,920 square feet of storage containers, a free-standing shade structure, an approximately 4,800-square-foot administration trailer, an approximately 3,420-square-foot exterior dining area and approximately 1,960 square feet for a 154 60-gallon bin storage room. Floor space totals approximately 24,780 square feet, including the temporary tent structure. Outside areas include an approximately 1,980-square-foot outdoor pet area, bike racks, a smoking area and general open space. There are 111 parking spaces on the site. Approximately 20 parking spaces are proposed for on-site parking for the proposed facility. Minor alterations to existing utilities and 380-linear-feet of street and onsite fencing fence are also included in the project. The project includes the removal of a 200 linear foot long fence. Minimal grading at less than a 10 percent slope will occur to replace existing asphalt, to install utilities and tent footings.

The project site is zoned M1-1 with a Limited Manufacturing land use. The site is located just northwest of the intersection of Main Street and Abbot Kinney Boulevard and is bounded by Main Street, Sunset Avenue, Pacific Avenue, and Thornton Place. Currently, the project site vacant, with a large paved area and one building near the southern property boundary.

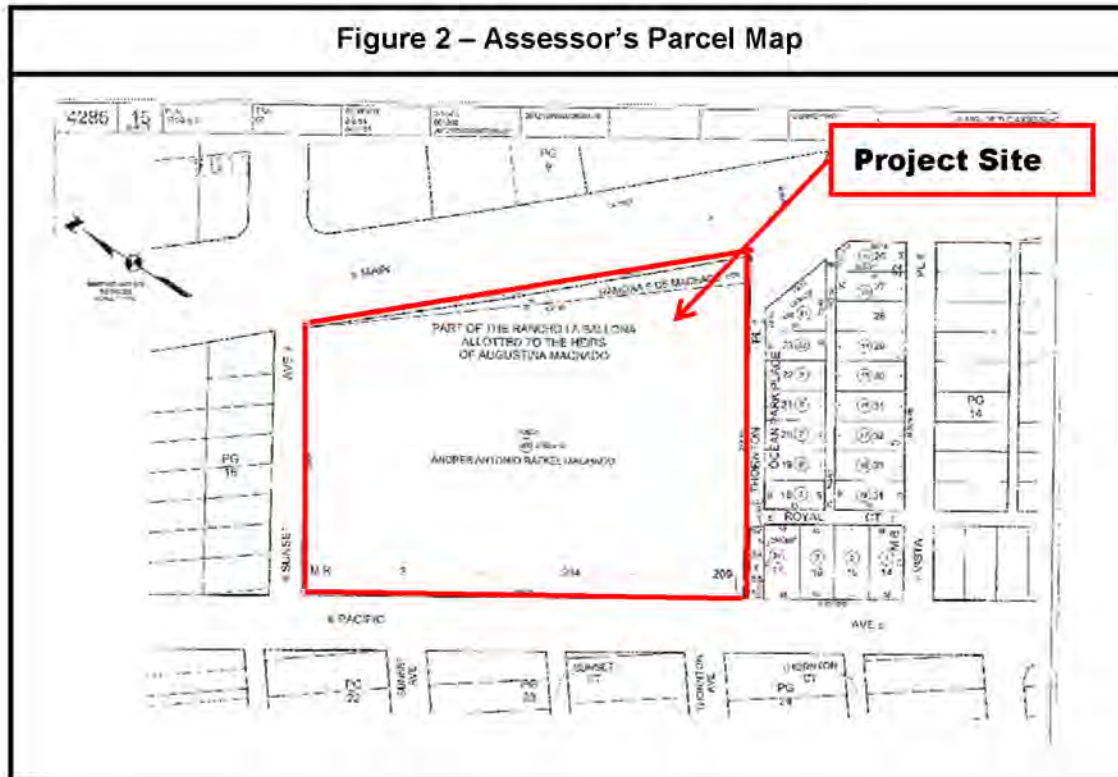
Parcels that surround the site on the north, south and west are zoned for residential land uses. Parcels to the east are zoned for industrial land uses. Venice Beach is one block to the west.

Bridge Housing on 100 E Sunset Avenue

The proposed project site encompasses approximately 130,505 square feet, is comprised of one lot and is irregular-shaped. The project is located in a Transit Priority Area, and is generally bounded by Sunset Avenue (and Rose Avenue thereon) to the north, Thorton Place (and Venice Boulevard thereon) to the south, Pacific Avenue to the west and Main Street to the east. Main Street and Pacific are both designated Avenue II (i.e., right of way width of 86 feet and roadway width of 56 feet) in the City of Los Angeles Mobility Plan. The project site is located approximately 700 feet from the Pacific Ocean within the Single Jurisdictional California Coastal Zone.



Figure 2 – Assessor's Parcel Map



The closest transit stop is on the east side of the project site on Main Street. Regional transit access to and from the site to Downtown Los Angeles Union Station is via Venice Boulevard. The project is consistent with the Los Angeles Municipal Code and the City of Los Angeles General Plan (General Plan) and will not significantly impact environmental resources.

The proposed project will be operated by the City of Los Angeles through Los Angeles Homeless Services Authority, or another City vendor. Full staff will be onsite during daytime operational hours to provide services. The site will be continuously staffed, 24 hours a day, with security personnel, and provided with security directional lighting. Standard conditions, including a construction management plan incorporated into the project design, will apply. The project will not significantly impact environmental resources.

The project design shall comply with a construction management plan that includes project design conditions, as necessary, to protect the health, safety, or convenience of affected sensitive receptors, located in the neighborhood that surrounds the project. The construction management plan and appropriate design conditions have been selected from the *City of Los Angeles, Bureau of Engineering, Master Specifications, Division 01, General Requirements, Section 01562, Part 1.1.C*. Selected design conditions are detailed further under applicable resource area analyses (Reference 2). In addition, unless otherwise stated, the proposed project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards including but not limited to:

- Los Angeles Municipal Code
- Bureau of Engineering Standard Plans
- Standard Specifications for Public Works Construction

- Work Area Traffic Control Handbook
- Additions and Amendments to the Standard Specifications for Public Works Construction

II. THE PROJECT IS EXEMPT FROM CEQA BASED ON A STATUTORY EXEMPTION IN PUBLIC RESOURCES CODE SECTION 21080.27 APPLICABLE TO BRIDGE HOMELESS EMERGENCY SHELTER PROJECTS LOCATED IN THE CITY OF LOS ANGELES

Assembly Bill 1197 (AB 1197) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the project is exempt from CEQA pursuant to AB 1197 (Pub. Resources Code, section 21080.27).

A. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles (the City) City Council has declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (Council File No. 15-1138-S33), which is currently in effect (Council File No. 15-1138-S40 [June 14, 2019]).

B. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

AB 1197 is an urgency statute that is necessary for the immediate preservation of public peace, health and safety that addresses the unique circumstances faced by the City of Los Angeles, and allows for the expeditious development of emergency shelters. The intent of AB 1197 is to help the City address its homeless crisis by developing emergency shelters pursuant to the crisis declaration. The City builds these emergency shelters pursuant to its “A Bridge Home” program.

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.”

Service-Enriched Shelter, Case Management Connecting to Services. The requirements are met by this project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.” This project provides temporary housing through the development and operation of a shelter, with case managers staffing the facility that provide connections to these homeless services and assistance for the occupants. This is one of the fundamental purposes of this shelter project.

For example, the project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both participants and providers, and helps participants rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Services create a culture of nonviolence, learning, and collaboration.

The *A Bridge Home* program shelters are operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency *A Bridge Home* project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's 2018-2019 Bridge Housing Scope of Required Services (SRS), service providers that oversee an *A Bridge Home* shelter must provide case management services and develop a Housing Stability Plan with each participant. A Bridge Home program implements a case management and service plan known as *Housing-Focused Case Management and Support Services (HFCMSS)*. HFCMSS includes but is not limited to: support with completing housing applications, accompanying the participant to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to participants through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect participants to permanent housing. Case Management should make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay in the Bridge Housing bed.

HFCMSS connects participants to a Housing Navigator who assists participants to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). Usually a case manager is assigned to a participant when the participant enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists participants with Housing Navigation services. Housing Navigation services are available to participants to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days of the *A Bridge Home* stay. Housing Navigation services may be provided onsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with participants are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating participants on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660 and, in being a Housing First shelter, the project also complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). Housing First means the evidence-based model that uses housing as a tool, rather than a reward, for

recovery from homelessness, and that centers on providing or connecting homeless people to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

"Housing First" also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. For time-limited, supportive services programs serving homeless youth, programs should use a positive youth development model and be culturally competent to serve unaccompanied youth under 25 years of age. Providers should work with the youth to engage in family reunification efforts, where appropriate and when in the best interest of the youth. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance.

Although time-limited rental and supportive services programs may not be applicable to the City's shelters, the overall continuum of care uses family reunification and positive youth development among the strategies to address the unique needs of unaccompanied homeless youth. Regardless, the shelters do provide a strengths-based approach through LAHSA's scope of required services, which complies with the positive youth development model by assisting participants to identify their own strengths, develop coping skills, and build resiliency. The shelters, including this project, also provide initial efforts for family reunification by requiring that the first conversation upon entry should be to assess for the possibility of diversion so as to assist the person self-resolve their housing and/or make reasonable efforts to re-connect with supportive family and/or friends who could temporarily or permanently house the participant, rather than reside in the Bridge Housing. If resources are needed to successfully divert a person from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, Contractor should continue to have Problem Solving conversations with the participant while residing in Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting participants to exit to safe and stable housing. Thus the aspirational goals in the Housing First statute related to homeless youth programs are met to the extent they are applicable.

This project additionally meets the other above-noted Housing First requirements. The A Bridge Home program shelters are operated by service providers coordinated through the Los Angeles Homeless Services Authority (LAHSA). All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's 2018-2019 Program Standards, all eligible participants are to be served with a Housing First approach. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Participants will not be rejected or exited from participation in Bridge Housing due to any unnecessary barriers.

The City's A Bridge Home program is intended to be a Housing First program focused on quickly moving people experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that persons are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's shelters developed under the A Bridge Home program, including this emergency shelter

project, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help people who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this project, are primarily focused on connecting, transitioning, and referring homeless people into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency "A Bridge Home" shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this project, are never mandatory and cannot be a condition of obtaining the housing intervention. The Venice Bridge Home will provide temporary housing, case managers and Housing Navigators staffed at the facility who provide connections to homeless services for the occupants. Based on the above-noted information, the Venice Bridge Home emergency shelter, meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this project, meet these requirements.

In the Venice shelter, partners are allowed to cohabitate areas that are not population-specific, although sleeping in separate cubicles. The tent structure living area has 100 beds for adults, separated into men's and women's quarters, where they will not be able to share the same bed but can live on site together at the same time. Multiple outside common areas allow couples to spend time together.

The Venice Bridge Home is pet friendly. Participants are allowed to bring their pets to the shelter and live with them inside their living area. The facility includes an outside pet relief area so that owners can bring their pets to use the restroom 24 hours a day. However, there is no pet play area onsite. Therefore, the Venice Bridge Home facility allows for pets and provides pet friendly facilities for participants who choose to be accompanied by their pets. As shown on prior site diagrams, and Attachment A – Project Site Plan, the Venice Bridge Home includes pet relief area.

The Venice Bridge Home has bin-storage for personal possessions. Every participant who lives at the Venice Bridge Home will have their own personal storage bin for their possessions. The facility is designed with approximately 1,960-sf of bin storage space that fits approximately 154 60-gallon storage bins. Separate storage areas for adults and youth are both located outside the adult sleeping quarters tent structure. A harm reduction program design is used at the site and includes providing lockable safe boxes for participants to discreetly lock and store personal property before entering the shelter. Personal possessions are processed through an area called "bin storage sorting areas" located next to the bin-storage space. Therefore, the Venice Bridge Home facility allows for the storage of possessions using a harm reduction program design. As noted in Attachment A – Project Site Plan and the prior site diagrams, the Venice Bridge Home includes bin-storage and bin-storage sorting areas.

The Venice Bridge Home facility is designed to provide privacy to participants. Hygiene trailers for adults and youth are separated and provide privacy through individual stalls. Further, adult

and youth sleeping quarters are separate. The adult beds are located within the large tent structure. There are separate men's and woman's sleeping quarters within the adult tent structure. The youth beds are disbursed between four small trailers and will also be gender specific. The youth trailers are located on the northern end of the facility. Each bed in both the adult and youth sleeping quarters is in a cubicle surrounded by privacy partitions in a dormitory setting. No guests will be allowed inside the sleeping quarters to allow for privacy. Therefore, the Venice Bridge Home facility is managed and designed to allow for the privacy of participants. As noted in Attachment B – Project Feasibility Plans and prior site diagrams, the Venice Bridge Home design allows for privacy. Cubicle spaces are provide to afford the occupants privacy between the partitions.

The Venice Bridge Home facility uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, harm reduction storage areas for possessions, and is managed and designed for individual's privacy. All of the City's Bridge Home program emergency shelters, including the Venice Bridge Home project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

C. The Project Meets the Requirements of Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect people to permanent housing through a services plan that identifies services staffing. This project meets that requirement. As noted above, the project includes housing-focused case management sessions that involve developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

The Housing Stability Plan is the participant's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the participant right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the person's situation changes and steps are completed or revised accordingly.

Participants are assisted with a range of activities that address the stated goals of the participant in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services

- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Accordingly, A Bridge Home programs must make attempts to create plans which minimize extraneous, inordinate, or superfluous action steps, including requiring participants to rapidly acquire new knowledge or skills, or make significant or simultaneous changes, in order to obtain permanent housing placement. Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect people to permanent housing. All City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's A Bridge Home program collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. A Bridge Home case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The A Bridge Home program collaborates with Los Angeles County Case Entry system Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the

City's A Bridge Home shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. The City's A Bridge Home emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless people. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Participants' Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the participant to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked and information are provided to participants in HMIS with the goal of the participant achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the project meets the requirements set forth in Government Code Section 65662.

D. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (Public Resources Code section 21080.27(a)(2).) As noted in the memorandum provided by the City's Planning Department dated October 30, 2019, the project is considered an infill site because the site's perimeter is surrounded by qualified urban uses. The site consists of three lots that create a mostly rectangular-shaped area of approximately 136,156 square feet with frontages on all sides on Sunset Avenue, Main Street, Thornton Place, and Pacific Avenue. The site is surrounded by residential zoned lots with

residential uses along Sunset Avenue, Thornton Place, and Pacific Avenue. The other side of Main Street is zoned industrial, but it is primarily composed of residential and commercial office uses. The other use on the other side of Main Street is a public parking lot that appears to be primarily used for a nearby Gold's Gym. Therefore, the site meets the requirement that at least 75% of the perimeter be surrounded by qualified urban uses.

E. The Project Involves Qualified Funding Under AB 1197

Public Resources Code Section 21080.27(a)(2)(A)-(D) exempts emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. As noted in the original approval documents for this project, in Council File No. 18-0510 (the communication from the City's Homelessness and Poverty Committee members, dated December 5, 2018), funding for the project is at least in part from "funds being appropriated from the Homeless Emergency Aid Program (HEAP)..." On December 11, 2018, the City Council approved that recommendation for the funding. Because the "Homeless Emergency Aid program" is a qualified funding source under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement under AB 1197 is met.

F. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

Public Resources Code Section 21080.27(b)(1), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This project involves an emergency shelter, as described above, which is located in the City of Los Angeles. The City will be constructing the emergency shelter for this project and approving funding and contracts for the construction and operation of the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles, and qualify for exemption from CEQA under AB 1197.

G. The Project Involves an Eligible Public Agency taking a Qualified Action under AB 1197

Public Resources Code Section 21080.27(b)(2), exempts from CEQA certain activities by specified Eligible Public Agencies. The Eligible Public Agencies are, as follows: (A) The County of Los Angeles; (B) The Los Angeles Unified School District; (C) The Los Angeles County Metropolitan Transportation Authority; (D) The Housing Authority of the City of Los Angeles; (E) The Los Angeles Homeless Services Authority; (F) The Los Angeles Community College District; (G) The successor agency for the former Community Redevelopment Agency of the City of Los Angeles; (H) The Department of Transportation; and (I) The Department of Parks and Recreation. AB 1197 exempts any action by such Eligible Public Agencies "to lease, convey, or encumber land owned by that agency, or to any action taken by an eligible public agency to facilitate the lease, conveyance, or encumbrance of land owned by that agency, or to any action taken by an eligible public agency in providing financial assistance, in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles."

This project involves The Los Angeles County Metropolitan Transportation Authority leasing its property to the City of Los Angeles in furtherance of the City building and operating an emergency shelter in the City of Los Angeles. Therefore, Los Angeles County Metropolitan Transportation Authority's action to lease its property is exempt under AB 1197.

III. CONCLUSION

Based on the above-noted information, the project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

REFERENCES

1. LAHSA, 2019-2020 *Bridge Housing Program Scope of Required Services (SRS)*, September 1, 2019, <https://www.lahsa.org/documents?id=2624-scope-of-required-services-srs-bridge-housing.pdf>.
2. LAHSA, *Join HMIS*, last visited October 30, 2019, <https://www.lahsa.org/hmis/join-hmis>
3. LAHSA, *About HMIS*, last visited October 30, 2019, <https://www.lahsa.org/hmis/about>
4. LAHSA, *HMIS Policies and Procedures*, page 12, March 19, 2018, <https://www.lahsa.org/documents?id=1128-la-hmis-policies-and-procedures.pdf>
5. LAHSA, *HMIS Intake and Enrollment Form*, December 1, 2018, <https://www.lahsa.org/documents?id=1125-form-1125-hmis-intake-and-enrollment.pdf>
6. LAHSA, *2018-2019 LAHSA Program Standards*, June 22, 2018, <https://www.lahsa.org/documents?id=2280-2018-2019-lahsa-program-standards.pdf>
7. LAHSA, CA-600 CoC Registration FY2016, Sept. 12, 2016, p. 45, <https://documents.lahsa.org/programs/supernofa/2016/FY2016CoCAApplication.pdf> [family reunification and positive youth development programs].
8. City of Los Angeles, Department of City Planning, Memo, *100 E. Sunset Avenue; AB 1197 Location Requirements*, October 30, 2019.9. City of Los Angeles, Mayor Eric Garcetti, *Executive Directive 24, Building "A Bridge Home,"* May 30, 2018.

ATTACHMENTS

- A. Project Site Plan
- B. Project Feasibility Plan

RMM Decl.
Exhibit 62

RMM Decl.
Exhibit 62

HOLLY L. WOLCOTT
CITY CLERK

City of Los Angeles
CALIFORNIA

OFFICE OF THE
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER



KAREN BASS
MAYOR

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213)978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.GOV

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 20-0841-S31

Council Meeting Date: March 3, 2023

Agenda Item No.: 21

Agenda Description: STATUTORY EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO STATE CEQA GUIDELINES SECTION 15269(c), PUBLIC RESOURCES CODE (PRC) SECTION 21080(b)(4), and PRC SECTION 21080.27 (AB 1197); COMMUNICATIONS FROM THE CITY ADMINISTRATIVE OFFICER and THE BUREAU OF ENGINEERING relative to the lease extension for continued use of the Crisis and Bridge Housing at 407 North Beacon Street (previously 515 North Beacon Street); and the 16th report regarding COVID-19 Homelessness Roadmap funding recommendations; and related matters.

Council Action: HOUSING AND HOMELESSNESS COMMITTEE REPORT - ADOPTED

Council Vote:

YES	Blumenfield	YES	de León	ABSENT	Harris-Dawson
YES	Hernandez	YES	Hutt	YES	Krekorian
YES	Lee	YES	McOsker	YES	Park
ABSENT	Price Jr.	ABSENT	Raman	ABSENT	Rodriguez
YES	Soto-Martínez	YES	Yaroslavsky		

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 341

FILE SENT TO MAYOR
LAST DAY FOR MAYOR TO ACT

03/07/2023

03/17/2023

APPROVED

Karen Bass

3/8/2023

DATE SIGNED

Adopted Report(s) Title

Report from Housing and Homelessness Committee 3-1-23

STATUTORY EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO STATE CEQA GUIDELINES SECTION 15269(c), PUBLIC RESOURCES CODE (PRC) SECTION 21080(b)(4), and PRC SECTION 21080.27 (AB 1197) and HOUSING AND HOMELESSNESS COMMITTEE REPORT relative to the lease extension for continued use of the Crisis and Bridge Housing at 407 North Beacon Street (previously 515 North Beacon Street); and the 16th report regarding COVID-19 Homelessness Roadmap funding recommendations; and related matters.

Recommendations for Council action, SUBJECT TO THE APPROVAL OF THE MAYOR:

1. DETERMINE the lease and continued use of the Crisis and Bridge Housing at 407 North Beacon Street (previously 515 North Beacon Street) is statutorily exempt from CEQA under PRC, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guidelines, Section 15269(c); and PRC, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters. This determination is consistent with, and supported by, the City Council's prior actions for the development and use of the property as a shelter; and CEQA determination made on June 14, 2019 (Council file No. 18-0651-S3); as referenced in the Notice of Exemption dated February 17, 2023, attached to Council file No. 20-0841-S31.
2. APPROVE the recommendations contained in the revised City Administrative Officer (CAO) report dated February 24, 2023, attached to Council file No. 20-0841-S31.

Fiscal Impact Statement: The CAO reports that there is no impact to the General Fund as a result of the recommendations in this report at this time. The recommendations in this report will be funded with the City's General Fund approved for homelessness interventions the AHS-GCP, as well as with HHAP-2, ESG-CV, and the County service funding commitment from FY 2021-22 and FY 2022-23.

Financial Policies Statement: The CAO reports that the recommendations in this report comply with the City's Financial Policies in that budgeted funds and grant funds are being used to fund recommended actions.

Community Impact Statement: None submitted

SUMMARY

At the meeting held on March 1, 2023, your Housing and Homelessness Committee considered CAO and Bureau of Engineering reports relative to a statutory exemption and the lease extension for continued use of the Crisis and Bridge Housing at 407 North Beacon Street (previously 515 North Beacon Street); and the 16th report regarding COVID-19 Homelessness Roadmap funding recommendations; and related matters.

After an opportunity for public comment was held, the Committee recommended to move forward the recommendations contained in the revised CAO report, as detailed above. This matter is now submitted to the Council for consideration.

Respectfully Submitted,



HOUSING AND HOMELESSNESS COMMITTEE

<u>MEMBER</u>	<u>VOTE</u>
RAMAN:	YES
BLUMENFIELD:	YES

HARRIS-DAWSON: ABSENT
RODRIGUEZ: YES
LEE: YES

LV 3.1.23

-NOT OFFICIAL UNTIL COUNCIL ACTS-

**BOARD OF PUBLIC WORKS
MEMBERS**

AURA GARCIA
PRESIDENT

M. TERESA VILLEGAS
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CITY OF LOS ANGELES

CALIFORNIA



KAREN BASS
MAYOR

**DEPARTMENT OF
PUBLIC WORKS**

**BUREAU OF
ENGINEERING**

TED ALLEN, PE
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

February 17, 2023

The Honorable Paul Krekorian
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

**LEASE EXTENSION AND CONTINUED USE OF THE CRISIS AND BRIDGE HOUSING
FACILITIES AT 407 N. BEACON STREET (PREVIOUSLY 515 N. BEACON STREET)
(C.F. 20-0841) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICE OF
EXEMPTION (NOE)**

Dear President Krekorian and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the lease extension and continued use of the Crisis and Bridge Housing facilities at 407 N. Beacon Street (previously 515 N. Beacon Street) in Council District 15.

RECOMMENDATION

Staff recommends that Council determine the actions that allow for the lease extension and continued use of the Crisis and Bridge Housing facilities at 407 N. Beacon Street (previously 515 N. Beacon Street) are statutorily exempt from the California Environmental Quality Act under Public Resources Code, Section 21080(b)(4), as specific actions necessary to prevent or mitigate an emergency as also reflected in the State CEQA Guidelines, Section 15269(c); and under Public Resources Code, Section 21080.27 (AB 1197) applicable to City of Los Angeles homeless shelters. Please refer to the attached NOE.

Honorable Paul Krekorian
February 17, 2023
Page 2 of 2

If you have any questions, please contact Maria Martin at Maria.Martin@lacity.org or (213) 485-5753.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jose Fuentes".

for

Ted Allen, PE
City Engineer

Attachment

TA/JF/mem:

cc: Deborah Weintraub, Bureau of Engineering
Jose Fuentes, Bureau of Engineering
Marina Quinones, Bureau of Engineering
Maria Martin, Bureau of Engineering

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 15
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PROJECT TITLE: Bridge Housing at 407 N Beacon St (previously 515 N Beacon St) Lease	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 407 North Beacon Street, in the San Pedro Community Plan Area of the City of Los Angeles (City), Los Angeles County (see Figure 1: Project Location, T.G. 824 – C4)

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The Bridge Housing at 407 N Beacon St (previously 515 N Beacon St) Lease (Project) consists of an extended, or new lease, for approximately up to three years with continued use/operation, for approximately up to six years total use of the temporary bridge housing facility. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide approximately up to three additional years, to the previously approved three years, of emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2023, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA</u> <u>GUIDELINES</u>	<u>STATE CEQA</u> <u>GUIDELINES</u>	<u>CA PUBLIC</u> <u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in Article 18 of the State CEQA Guidelines, Section 15269(c); and Public Resources Code, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters. This determination is consistent with the NOE supporting documents in Council File (CF) No. 18-0651-S3, and consistent with, and supported by, the City Council's prior action and resolution approving the development and use of this shelter (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE:		TITLE:	DATE:
Maria Martin		Environmental Affairs Officer Environmental Management Group	
FEE: 75.00 _____	RECEIPT NO.	REC'D BY	DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project consists of an approximately up to three-year lease extension or new lease, and operation of the Bridge Housing facility for approximately up to three additional years in furtherance of providing an emergency homeless shelter in the City of Los Angeles at the bridge housing facility located on California State Department of Transportation-owned property at 407 N. Beacon St that was found to be categorically exempt and approved by City Council on June 14, 2019 (CF No. 18-0651-S3). The documents supporting those determinations (CF No. 18-0651-S3) are incorporated herein by reference as support for this CEQA determination. This Project continues the existing use of the facility that was built, assigned the address 407 N. Beacon St upon issuance of the Department of Building and Safety Certificate of Occupancy, and is currently operating, without substantial change.

The shelter, which opened in July 2020, will continue to be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to *Crisis Housing Program for All Populations Scope of Required Services* (LAHSA, 2020-2021). A third-party service provider, e.g., Harbor Interfaith Services, Inc., will operate the Project for the City, as it has been for the past several years, and it is anticipated that a lease, lease extension, or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

Project operation continues per a security plan consistent with the LAHSA's standards. By creating a stable environment and providing access to basic needs, clients can maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will continue to be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section.

The Project site is zoned C2-2D-CPIO with a Community Commercial land use designation and is located northwest of the intersection of Beacon St and O'Farrell St. Residential uses are located to the north and west and commercial uses to the east and south of the site.

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Based on information from the Census and the Los Angeles Homeless Services Authority (LAHSA), in 2020, homeless persons constituted approximately 1.07 percent of the City's population. (U.S Census Bureau, 2021 & LAHSA, 2020)

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabilski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as Emergency Room (ER) visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the *New England Journal of Medicine* found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, *Hospitalization Costs Associated with Homelessness in New York City*, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*). During the first six months of 2020, LAPD reported 1,738 instances where a homeless individual was a victim of a serious crime including homicide, rape, aggravated assault, burglary, and larceny (LAPD, 2020).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (Commander Dominic H. Choi, 2019). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*). According to the LAPD Use of Force Year-End Report in 2020, among the 41,290 estimated homeless individuals throughout the City, 7,872 persons were reported to be victims of a violent or property crime. In the same year, 5,722 persons experiencing homelessness were reported as suspects of a violent or property crime. (LAPD, 2020). On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-

Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1		
2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease

Table 1		
2018 Homeless Count Data Summary		
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2		
2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3		
2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

LAHSA prepared a 2021 shelter point-in-time count for the City of Los Angeles that estimated the number and demographic characteristics of the sheltered homeless population on a single night in January 2021. Released in July 20, 2021, it shows that the

homelessness emergency in the City of Los Angeles continues unabated and uncertain. The documented number of individuals experiencing sheltered homelessness increased yet again, as shown in *Table 4 - 2021 Housing Inventory Count and Shelter Count Data Summary* (LAHSA, 2021). The 2021 unsheltered street count could not be conducted due to the COVID-19 pandemic. However, the availability of vaccinations enabled the resumption of the Homeless Count for February 2022 with appropriate precautions (LAHSA, 2022).

Table 4 2021 Housing Inventory Count and Shelter Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	12,503	1% Increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

"We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19," said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. "It is important that we act now to protect this population and the compassionate people who serve them." (Corey Egel, 2020.)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations "with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness." (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the "need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19." (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor stated that "[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19," and "California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19." (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted "in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials." (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019, continues unabated in 2022 and was exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

- (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

- (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health

services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the Project’s programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor’s safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA’s Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants’ to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are

dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's

System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 100 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this project, meet these requirements. Therefore, none of

the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is “low barrier” within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA’s Scope of Required Services.

The Housing Stability Plan is the family or individual’s service plan that summarizes the participant’s housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person’s situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services

- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is

considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The lot is zoned C2-2D-CPIO which is a mixed use zone that allows for multifamily uses under certain circumstances. The site is currently developed with a homeless shelter facility, which is a residential use since it provides a temporary emergency residence for people experiencing homelessness, as an interim home until they can find more a permanent home. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. Residential uses are located to the north and west and commercial used to the east and south of the site. Therefore, the also site meets the definition of infill site. (City of L.A., Bureau of Engineering, Letter, 2023). Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The City has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement may also be met. However, the Project meets other requirements as described elsewhere in this document.

On June 14, 2019, City Council authorized use of Homeless Housing Assistance Program (HEAP) grant funds (C.F.18-0651-S3) for construction of the facility. On December 11, 2019, the City Council and Mayor approved HEAP funding to supplement County Measure H funding for the operating costs of the site for one year (C.F 18- 0628). Measure H and HEAP are qualified funding sources under AB 1197, and therefore at least a portion of the funding of the project related to its establishment and operation used qualified funding that qualifies the project for exemption under AB 1197. This is sufficient since it shows that the project is a qualified homeless shelter project.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves the continued lease and operation of an existing homeless shelter that the City constructed and operated for several years, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

The Project Involves an Eligible Public Agency taking a Qualified Action under AB 1197

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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RMM Decl.
Exhibit 63

RMM Decl.
Exhibit 63

HOLLY L. WOLCOTT
CITY CLERK

City of Los Angeles
CALIFORNIA

OFFICE OF THE
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER



ERIC GARCETTI
MAYOR

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213)978-1040

December 3, 2021

PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.ORG

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 20-0841
Council Meeting Date: December 3, 2021
Agenda Item No.: 14
Agenda Description: STATUTORY EXEMPTION and HOMELESSNESS AND POVERTY COMMITTEE REPORT relative to COVID-19 Homelessness Roadmap funding.
Council Action: HOMELESSNESS AND POVERTY COMMITTEE REPORT - ADOPTED FORTHWITH
Council Vote:

YES	Blumenfield	YES	Bonin	ABSENT	Buscaino
ABSENT	Cedillo	YES	de León	YES	Harris-Dawson
ABSENT	Koretz	YES	Krekorian	YES	Lee
YES	Martinez	YES	O'Farrell	YES	Price
YES	Raman	ABSENT	Rodriguez		

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 341

FILE SENT TO MAYOR
LAST DAY FOR MAYOR TO ACT

12/03/2021
12/13/2021

APPROVED

RM 001/12/11/2021 p. 197

DATE SIGNED

Adopted Report(s) Title

Report from the Homelessness and Poverty Committee_11-29-21

STATUTORY EXEMPTION and HOMELESSNESS AND POVERTY COMMITTEE REPORT
relative to COVID-19 Homelessness Roadmap funding.

Recommendations for Council action, SUBJECT TO THE APPROVAL OF THE MAYOR:

1. DETERMINE the Crisis and Bridge Housing facility at 499 North San Fernando Road, which allows for leasing, construction, and the operation as temporary homeless shelter for people experiencing homelessness, is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in California Environmental Quality Act (CEQA) Guidelines Section 15269(c); and under Public Resources Code Section 21080.27 (AB 1197) applicable to the City's emergency homeless shelters.
2. APPROVE the recommendations in the revised subject City Administrative Officer (CAO) report, dated November 23, 2021, attached to the Council file, as amended as follows:
 - a. Instruct the CAO, in consultation with the affected Council Districts and the Bureau of Engineering, to report back in 45 days with a list of unfunded interim housing projects throughout the City including the number of units that the project will create as well as a rough order of magnitude capital cost of each project.
 - b. Amend Recommendation 13e (page 4 of the subject revised CAO report) to reduce the reprogramming amount to accommodate one to two additional storage pods.
 - c. Find financing options and look into whether all of the existing Roomkey options can be extended until the full time period that the Federal Emergency Management Agency will allow for full reimbursement.

Fiscal Impact Statement: The CAO reports that there is no impact to the General Fund as a result of the recommendations in the subject CAO report at this time. The recommendations in the CAO report will be funded with the City's General Fund approved for homelessness interventions, CARES Act, and the County's funding commitment in Fiscal Year (FY) 2021-22. Beginning in FY 2022-23, the annual cost of the City's share of ongoing operations and services for approved Roadmap interventions is estimated to be \$55,052,700, and the annual cost for approved ABH interventions not included in the Roadmap is estimated to be \$9,255,800, for a total of \$64,308,500. This annual cost will likely be reduced because of early conversion of Project Homekey sites to Permanent Supportive Housing and will be updated in a future report. Funding for these costs could be covered by the State's HHAP and HHAP2 grants.

Financial Policies Statement: The CAO reports that the recommendations in the subject CAO report comply with the City Financial Policies.

Community Impact Statement: None submitted

(Ad Hoc Committee on COVID-19 Recovery and Neighborhood Investment waived consideration of the above matter)

SUMMARY:

At a special meeting held on November 29, 2021, the Homelessness and Poverty Committee considered a Statutory Exemption, Department of Public Works and City Administrative Officer reports relative to California Environmental Quality Act (CEQA) analysis and recommendation that the Crisis and Bridge Housing facility located at 499 North San Fernando Road, which allows for leasing, construction, and the operation as temporary homeless shelter for people experiencing homelessness, be determined to be statutorily exempt under Public Resources Code (PRC) Section 21080(b)(4) as specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guidelines Section 15269(c); and under PRC Section 21080.27 (AB 1197) applicable to City's emergency homeless shelters; and, the ninth report regarding the COVID-19 Homelessness Roadmap funding recommendations.

During the discussion, representatives from the CAO provided background information on this matter. The members asked various questions and introduced amendments to the CAO recommendations. The amendments introduced by the Committee Chair, Councilmember Blumenfield and Councilmember Raman are detailed in Recommendation No 2 a,b and c, above.

After providing an opportunity for public comment, the Committee recommended to approve the recommendations in the revised CAO report, dated November 23, 2021, as amended. This matter is now submitted to the Council for consideration.

Respectfully submitted,

HOMELESSNESS AND POVERTY COMMITTEE

MEMBER	VOTE
DE LEÓN:	YES
RAMAN:	YES
BUSCAINO:	YES
RODRIGUEZ:	YES
BLUMENFIELD:	YES

LC 11/29/21

**BOARD OF PUBLIC WORKS
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CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

**DEPARTMENT OF
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**BUREAU OF
ENGINEERING**

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

November 23, 2021

The Honorable Nury Martinez
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

**CRISIS AND BRIDGE HOUSING FACILITY - CD 1 TINY HOME VILLAGE / RV
HOMELESS SHELTER - CYPRESS PARK AT 499 NORTH SAN FERNANDO ROAD
(C.F. 20-0841) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICE OF
EXEMPTION (NOE)**

Dear President Martinez and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to funding, construction, and operation of a bridge housing facility, to provide crisis shelter services at 499 North San Fernando Road in Council District 1.

RECOMMENDATION

Staff recommends that Council determine the Crisis and Bridge Housing project at 499 North San Fernando Road, which allows for the construction and operation of this property as a temporary shelter for those experiencing homelessness, is statutorily exempt under Public Resources Code Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); and Public Resources Code section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters. Please refer to the attached NOE.

Honorable Nury Martinez
November 23, 2021
Page 2 of 2

If you have any questions, please contact Maria Martin at Maria.Martin@lacity.org or (213) 485-5753.

Sincerely,



for

Gary Lee Moore, PE, ENV SP
City Engineer

Attachment

GLM/JF/mem
Q:\GLM\City Engineer\GLM Signed Documents\2021Documents\
TRANSMITTAL_CF20-0841_11-23-21

cc: Deborah Weintraub, Bureau of Engineering
Jose Fuentes, Bureau of Engineering
Marina Quinones, Bureau of Engineering
Maria Martin, Bureau of Engineering

ATTACHMENT

California Environmental Quality Act (CEQA) Notice of Exemption (NOE)

CD 1 Tiny Home Village / RV Homeless Shelter - Cypress Park

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**CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION**

(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 1
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PROJECT TITLE: CD 1 Tiny Home Village / RV Homeless Shelter - Cypress Park	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 499 N. San Fernando Road, in the Northeast Los Angeles Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 594 J7

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 1 Tiny Home Village / RV Homeless Shelter - Cypress Park (Project) consists of the construction of a new homeless shelter on City owned parcels and public right-of-way, a lease, and operation of the homeless shelter with emergency housing structures or units for up to approximately 132 beds for families and/or individuals, including one unit with four Americans with Disabilities Act (ADA) compliant single beds, for people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2021, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA</u> <u>GUIDELINES</u>	<u>STATE CEQA</u> <u>GUIDELINES</u>	<u>CA PUBLIC</u> <u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guideline, Section 15269(c); and Public Resources Code, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE: 11/22/2021
RECEIPT NO.	REC'D BY	DATE

DISTRIBUTION: (1) County Clerk; (2) Agency Record

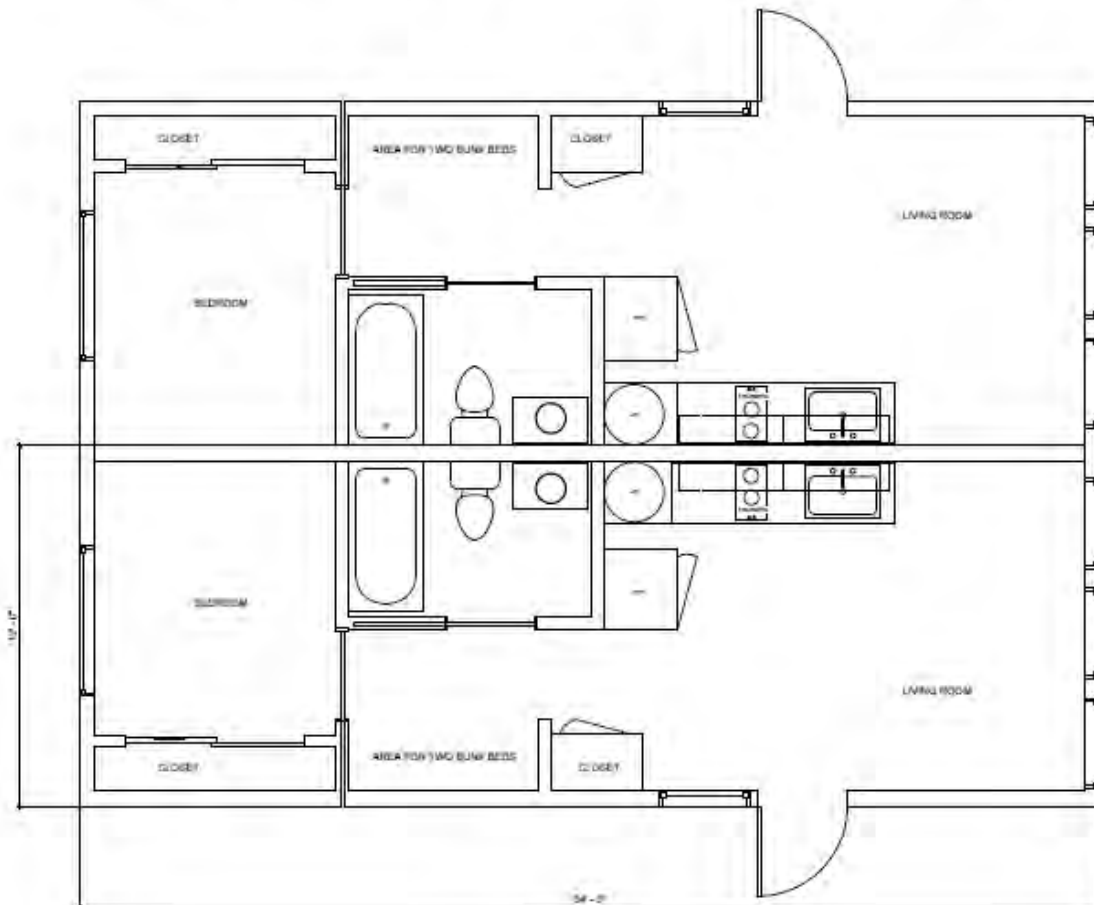
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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project will provide tiny homes, which consist of prefabricated structures/residential trailers. For this site, two residential trailers will be “stitched” or joined together to set up 16 standard duplex units (for approximately 128 occupants) and one unit with ADA compliant single beds (for four occupants), for a total site occupancy of approximately 132 individuals. Each duplex unit will be equipped with a bedroom, sleeping area, kitchen, bathroom and living space. Please see Figure 2 (below) for a sample floor plan. The site will also provide a main driveway entrance from Avenue 19th with a 20-foot double entrance gate and fire access lane, a guard booth, two administration structures, a flex space container, a laundry structure, mobile seating areas with umbrellas, a pet area, staff parking, site lighting, eight-foot high perimeter fencing with privacy slats, asphalt paving painted with solar reflective coating, two secondary emergency access gates, a new fire hydrant, solid waste receptacles; and utility connections, including potable water, sanitary sewer, and electric service. See Figure 3, for a conceptual site plan.

FIGURE 2: RESIDENTIAL UNIT SAMPLE FLOOR PLAN



a lease or similar operating and/or funding agreement may be executed with the service provider, County, and/or LAHSA.

The Project site is located on approximately 43,000 square-foot area comprised of City owned parcels and public right-of-way, southwest of the San Fernando Road and Riverside Drive intersection. The Project site parcels are zoned GW(CA) which is a nonresidential zone with an Open Space land use designation and are surrounded by parcels zoned for transportation facilities to the west and south, rail tracks and the Pasadena (110) Freeway respectively; open space to the north, and commercial/industrial uses to the east (City of Los Angeles Department of City Planning, 2016 and 2021). The Project site is located within in a Methane Buffer Zone.

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabalski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless

individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia

found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent

overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

“We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19,” said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. “It is important that we act now to protect this population and the compassionate people who serve them.” (Corey Egel, 2020.)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations “with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness.” (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the “need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19.” (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor stated that “[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19,” and “California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19.” (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted “in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials.” (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be

struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

- (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

- (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter

project. For example, the Project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community

resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's

System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 161 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's

emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is “low barrier” within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA’s Scope of Required Services.

The Housing Stability Plan is the family or individual’s service plan that summarizes the participant’s housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person’s situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support

- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted

above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The lot is zoned GW(CA) which is a nonresidential zone. The site is currently undeveloped; however, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are industrial uses and transportation facilities to the west, east, and south of the site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2016 and 2021).

The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses, industrial and transportation uses.

The Project site is located within an urban area on a parcel that is currently undeveloped and identified in the Community Plan as open space use, public right-of-way and is surrounded by qualified urban uses. Therefore, the site meets the definition of infill site. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The City has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement may also be met. However, the Project meets other requirements as described elsewhere in this document.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves construction of a new homeless shelter, lease, and operation of an emergency homeless shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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RMM Decl.
Exhibit 64

RMM Decl.
Exhibit 64

HOLLY L. WOLCOTT
CITY CLERK

City of Los Angeles
CALIFORNIA

OFFICE OF THE
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER



ERIC GARCETTI
MAYOR

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213) 978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.ORG

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 20-0841-S23

Council Meeting Date: May 31, 2022

Agenda Item No.: 26

Agenda Description: STATUTORY EXEMPTION and COMMUNICATION FROM THE BUREAU OF ENGINEERING (BOE) and HOMELESSNESS AND POVERTY COMMITTEE REPORT relative to COVID-19 Homelessness Roadmap funding recommendations and California Environmental Quality Act (CEQA) Notices of Exemptions (NOEs) for the construction of bridge housing facilities, tiny home village homeless shelters to provide crisis shelter services at 850 North Mission Road in Council District 14 and at 600 East 116th Place in Council District 15.

Council Action: COMMUNICATION FROM THE BUREAU OF ENGINEERING (BOE) AND HOMELESSNESS AND POVERTY COMMITTEE REPORT- ADOPTED

Council Vote:

YES	Blumenfield	YES	Bonin	YES	Buscaino
YES	Cedillo	YES	de León	YES	Harris-Dawson
YES	Koretz	YES	Krekorian	YES	Lee
YES	Martinez	YES	O'Farrell	YES	Price
YES	Raman	YES	Rodriguez	YES	Wesson, Jr.

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 341

FILE SENT TO MAYOR
LAST DAY FOR MAYOR TO ACT

06/01/2022

06/13/2022

APPROVED



6/7/2022

DATE SIGNED

Adopted Report(s) Title

Report from Homelessness and Poverty Committee 5-26-22

Report from Bureau of Engineering dated 5-20-22

BOARD OF PUBLIC WORKS
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CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

DEPARTMENT OF
PUBLIC WORKS

BUREAU OF
ENGINEERING

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

May 20, 2022

The Honorable Nury Martinez
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

CRISIS AND BRIDGE HOUSING FACILITIES - CD 14 N MISSION ROAD TINY HOME VILLAGE INTERIM HOUSING AT 850 NORTH MISSION ROAD AND CD 15 E 116TH PL TINY HOME VILLAGE AND PARKING IMPROVEMENTS AT 600 EAST 116TH PLACE (C.F. 20-0841) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF EXEMPTION (NOEs)

Dear President Martinez and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the construction of two bridge housing facilities, tiny home village homeless shelters, to provide crisis shelter services at 850 North Mission Road in Council District 14 and at 600 East 116th Place in Council District 15.

RECOMMENDATION

Staff recommends that Council determine the Crisis and Bridge Housing projects at 850 North Mission Road and 600 East 116th Place, which allow for the lease, construction, and use of these properties as temporary shelters for those experiencing homelessness, are statutorily exempt under Public Resources Code Section 21080(b)(4), as a specific actions necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters. Please refer to the attached NOEs.

Honorable Nury Martinez
May 20, 2022
Page 2 of 2

If you have any questions, please contact Maria Martin at Maria.Martin@lacity.org or (213) 485-5753.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jose Fuentes".

for
Gary Lee Moore, PE, ENV SP
City Engineer

Attachments

GLM/JF/mem

Q:\GLM\City Engineer\GLM Signed Documents\2022
Documents\TRANSMITTAL_CF20-0841_TinyHomes_850_N_Mission_Rd_and_600_
116th_PI_05-20-22

cc: Deborah Weintraub, Bureau of Engineering
Jose Fuentes, Bureau of Engineering
Marina Quinones, Bureau of Engineering
Maria Martin, Bureau of Engineering

ATTACHMENTS

1. Notice of Exemption (NOE) 14 N Mission Rd Tiny Home Village Interim Housing
2. Notice of Exemption (NOE) CD 15 E 116th Pl Tiny Home Village and Parking Improvements

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ATTACHMENT 1

Notice of Exemption (NOE)

CD 14 N Mission Rd Tiny Home Village Interim Housing

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CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 14
--	-------------------------------

PROJECT TITLE: CD 14 N Mission Rd Tiny Home Village Interim Housing	LOG REFERENCE C.F. 20-0841
--	--------------------------------------

PROJECT LOCATION: 850 N. Mission Road and 2212 Jesse Street, in the Boyle Heights Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 635 A3

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 14 N Mission Rd Tiny Home Village Interim Housing project (Project) consists of construction of a new homeless shelter on a City owned parcel, a lease, and operation of the homeless shelter with emergency housing structures or units for up to approximately 144 beds for families and/or individuals, including 70 units with standard double beds and four units with four Americans with Disabilities Act (ADA) compliant single beds, for people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2022, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
---	---

EXEMPT STATUS:	<u>CITY CEQA</u> <u>GUIDELINES</u>	<u>STATE CEQA</u> <u>GUIDELINES</u>	<u>CA PUBLIC</u> <u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guideline, Section 15269(c); and Public Resources Code, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters (see attached narrative).

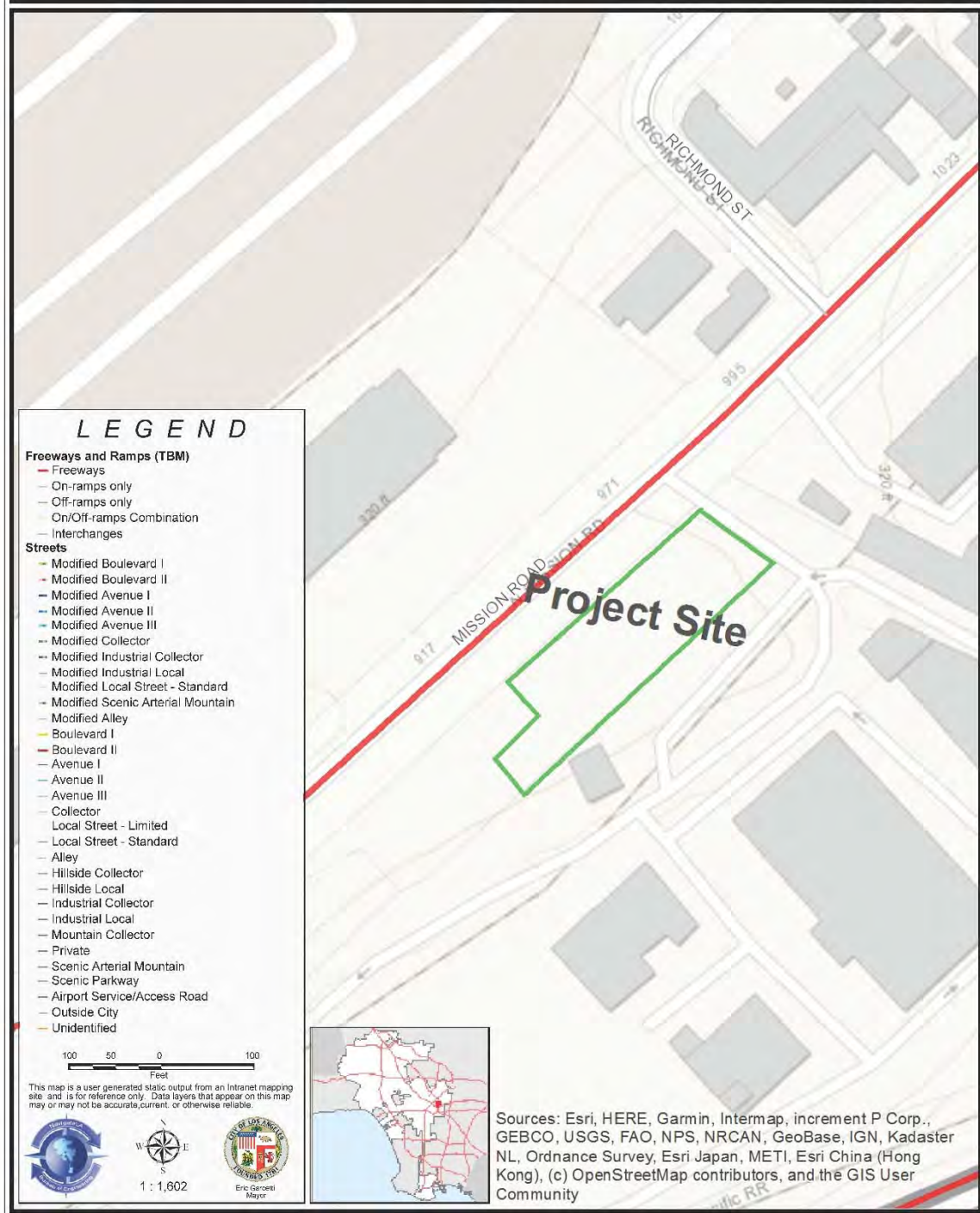
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE:
RECEIPT NO.	REC'D BY	DATE

DISTRIBUTION: (1) County Clerk; (2) Agency Record

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Figure 1: Project Location (Approximate Boundary)



EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project includes the construction of a new homeless shelter site, on a City-owned parcel at 850 N. Mission Road, that includes tiny homes with beds for up to 144 individuals experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. Tiny homes are small, detached, pre-fabricated cabins made of aluminum and composite materials that will be assembled on site. The Project is anticipated to include approximately 74 tiny homes, 70 with double beds (140 occupants) and 4 with ADA single beds; eight hygiene pallets with restrooms, showers, and lavatories; one laundry structure, four administration pre-fabricated structures, and two storage units. Refer to the Attachment for the Project site plans.

The site will also provide a main driveway entrance from Mission Road with a 20-foot sliding gate, a main pedestrian entrance and two emergency pedestrian exits, a guard booth, lockers, mobile seating areas with umbrellas, a pet area, approximately three staff parking stalls, approximately eight-foot high perimeter fencing with privacy slats, solid waste receptacles; and utility connections, including potable water, sanitary sewer, and electric service. Existing asphalt would be improved as required and some street tree trimming is anticipated. Sanitation bins currently located onsite will be relocated to another site that is pending planned development. The site is located at 2212 Jesse Street within the vicinity of the Mission Road and Jesse Street intersection. The site improvements related to the relocation of the bins at 850 N. Mission Road, consist of the development of an approximately 20,000 square foot empty lot owned by LASAN to be paved with new asphalt and installation new security lighting. The improvements include grading, drainage, trenching for power/lighting, and fencing. The complete redevelopment of the site as well as a proposed street vacation of the right-of-way along Jesse Avenue are underway under a separate CEQA review. Tree trimming would be conducted under a certified arborist in accordance with applicable City policy and the Migratory Bird Treaty Act, and in consultation with StreetsLA Urban Forestry Division.

The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to Crisis Housing Program for All Populations Scope of Required Services (LAHSA, 2020-2021). A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project operation will include approximately twenty employees working three shifts throughout the day with site security provided on a 24/7 basis or per a security plan consistent with the Los Angeles Homeless Services Authority's (LAHSA) standards. By creating a stable environment and providing access to basic needs, clients will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section.

A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project site is located on a parcel segment approximately 33,700 square-foot area comprised of City owned parcel currently used as a Sanitation Yard on Mission Road, southwest of the Mission Road and Marengo Street intersection. The Project site parcels are zoned M1-2D-RIO-CUGU which is a nonresidential zone that does allow for multifamily uses under certain circumstances. The site is currently developed with an industrial use. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. Industrial uses are located to the north, east, south, and west of the Project site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2016 and 2022).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabitski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent

with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1		
2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2		
2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

“We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19,” said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. “It is important that we act now to protect this population and the compassionate people who serve them.” (Corey Egel, 2020.)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations “with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness.” (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the “need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19.” (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor stated that “[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19,” and “California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19.” (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted “in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials.” (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be

struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

- (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

- (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter

project. For example, the Project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community

resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's

System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 144 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's

emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is “low barrier” within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA’s Scope of Required Services.

The Housing Stability Plan is the family or individual’s service plan that summarizes the participant’s housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person’s situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support

- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted

above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The lot is zoned M1-2D-RIO-CUGU which is a nonresidential zone that allows for multifamily uses under certain circumstances. The site is currently developed with an industrial use. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. Industrial uses are located to the north, east, south, and west of the Project site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2016 and 2022).

The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses, industrial uses. The Project site is located within an urban area on a parcel that is currently developed with a parking lot and is surrounded by qualified urban uses. Therefore, the site meets the definition of infill site. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The City has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement may also be met. However, the Project meets other requirements as described elsewhere in this document.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves construction of a new homeless shelter, lease, and operation of an emergency homeless shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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Attachment
Project Site Plan

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ATTACHMENT 2

Notice of Exemption (NOE)

CD 15 E 116th PI Tiny Home Village and Parking Improvements

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CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 15
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PROJECT TITLE: CD 15 E 116 th PI Tiny Home Village and Parking Improvements	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 600 E 116th Place, in the Southeast Los Angeles Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 704 D7 to 704 E7

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 15 E 116th PI Tiny Home Village and Parking Improvements (Project) consists of construction of a new homeless shelter on an existing California Department of Transportation (Caltrans) Park & Ride lot, parking improvements to the remaining park & ride lot, a lease, and operation of the homeless shelter with emergency sleeping cabins for up to approximately 41 beds for families and/or individuals, including 36 cabins, 29 with standard single beds, five cabins with standard double beds, and two cabins with Americans with Disabilities Act (ADA) compliant single beds, for people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2022, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guideline, Section 15269(c); and Public Resources Code, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE:
RECEIPT NO.	REC'D BY	DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project consists of the partial use of approximately 18,925 square feet of the Avalon Green Line Park & Ride lot for the construction of a new homeless shelter and parking improvements to the remaining of the 38,000-square foot lot. The shelter includes tiny homes with beds for up to 41 individuals experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. The tiny homes are small, detached, pre-fabricated cabins made of aluminum and composite materials that will be assembled on site. The Project is anticipated to include approximately 36 tiny homes; 29 with standard single beds, five with standard double beds, and two with ADA single beds; three pre-fabricated hygiene structures with restrooms, showers, and lavatories (two ADA, one standard); one laundry structure with service sink and drinking fountain, one pre-fabricated administration/flexible space structure, and one storage pallet. The site will also provide drive through access from 116th Place with a ten-foot double gate, a main pedestrian entrance, a guard booth, lockers, mobile seating areas with umbrellas, storage containers, a pet area, approximately three staff parking stalls, eight-foot high perimeter fencing with privacy slats, dumpsters; and utility connections, including potable water, sanitary sewer, and electric service. Existing asphalt would be improved as required. Some street tree trimming is anticipated and removal of one or two trees may be needed. Tree trimming and removal would occur in accordance with City policy, the Migratory Bird Treaty Act, and under the supervision of a certified arborist. Refer to Attachment A for the Project site plans.

The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to Crisis Housing Program for All Populations Scope of Required Services (LAHSA, 2020-2021). A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The shelter operation will include three shifts throughout the day with site security provided on a 24/7 basis or per a security plan consistent with the Los Angeles Homeless Services Authority's (LAHSA) standards. By creating a stable environment and providing access to basic needs, residents will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The parking lot improvements include a new driveway and curb cut, a new van ADA parking stall, ADA signage; and minor modifications and restriping in affected areas as required, approximately 19,000 square feet of asphalt resurfacing, and restriping of the

stalls to include approximately 40 total parking stalls, including 34 standard and six (five existing and the new van) ADA stalls.

The Project site is located on a Caltrans Park & Ride lot, southeast of the Avalon Boulevard and 116th Place intersection. The site consists of ten rectangular shaped lots with an area of approximately 38,000 square feet and frontages along 116th Place and Avalon Boulevard. The lots are zoned PF-1 which is a nonresidential zone that allows for multifamily uses under certain circumstances. The site is currently developed with a surface parking lot. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are residential uses to the north and west of the site and surface transportation facilities to the south of the site. (City of Los Angeles Department of City Planning, 2016 and 2022).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabilski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow,

Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018

Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

“We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19,” said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. “It is important that we act now to protect this population and the compassionate people who serve them.” (Corey Egel, 2020.)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations “with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness.” (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the “need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19.” (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor stated that “[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19,” and “California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19.” (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted “in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials.” (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be

struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter

project. For example, the Project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community

resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's

System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 41 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's

emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is “low barrier” within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA’s Scope of Required Services.

The Housing Stability Plan is the family or individual’s service plan that summarizes the participant’s housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person’s situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support

- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted

above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The Project site is zoned PF-1 which is a nonresidential zone that allows for multifamily uses under certain circumstances. The site is currently developed with a surface parking lot. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are residential uses to the north and west of the site and surface transportation facilities to the south of the site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2016 and 2022).

The Project site is an infill site that is bounded by parcels that are developed with qualified urban uses, industrial uses.

The Project site is located within an urban area on parcels that is currently developed with a parking lot and is surrounded by qualified urban uses. Therefore, the site meets the definition of infill site. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The City has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement may also be met. However, the Project meets other requirements as described elsewhere in this document.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves construction of a new homeless shelter, lease, and operation of an emergency homeless shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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Attachment
Project Site Plan

RMM Decl.
Exhibit 65

RMM Decl.
Exhibit 65

PETTY F. SANTOS
EXECUTIVE OFFICER



ERIC GARCETTI
MAYOR

Council and Public Services Division

200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213) 978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.ORG

June 3, 2021

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 20-0841

Council Meeting Date: June 2, 2021

Agenda Item No.: 9

Agenda Description: STATUTORY EXEMPTION and COMMUNICATION FROM THE CITY ADMINISTRATIVE OFFICER (CAO) relative to California Environmental Quality Act (CEQA) analysis and recommendation that the projects located on 7570 North Figueroa Street and 2301 West 3rd Street, be determined to be statutorily exempt under Public Resources Code (PRC) Section 21080(b)(4) as specific actions necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); PRC section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the projects use "Homeless Housing, Assistance and Prevention Program funds," they are exempt under Governor's order N-32-20; and, the sixth report regarding the COVID-19 Homelessness Roadmap funding recommendations.(Homelessness and Poverty Committee report to be submitted in Council. If a public hearing is not held in Committee, an opportunity for public comment will be provided.)(Click on the above hyperlink to go to: www.lacouncilfile.com for background documents.)(Ad Hoc Committee on COVID-19 Recovery and Neighborhood Investment waived consideration of the above matter)

Council Action: Homelessness and Poverty Committee Report Adopted Forthwith

Council Vote:

YES	Blumenfield	YES	Bonin	YES	Buscaino
YES	Cedillo	YES	de León	YES	Harris-Dawson
YES	Koretz	YES	Krekorian	YES	Lee
YES	Martinez	YES	O'Farrell	YES	Price
YES	Raman	YES	Ridley-Thomas	YES	Rodriguez

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 341

FILE SENT TO MAYOR
LAST DAY FOR MAYOR TO ACT

06/03/2021

06/14/2021

APPROVED

6/3/2021
RMM Decl., Vol 2, p. 287

DATE SIGNED

Adopted Report(s) Title
Report from the Homelessness and Poverty Committee_5-27-21

STATUTORY EXEMPTION and HOMELESSNESS AND POVERTY COMMITTEE REPORT
relative to COVID-19 Homelessness Roadmap funding.

Recommendations for Council action, SUBJECT TO THE APPROVAL OF THE MAYOR:

1. DETERMINE the Crisis and Bridge Housing facilities at 2301 West 3rd Street and 7570 North Figueroa Street, which allow for leasing, minor improvements, and the operation as temporary homeless shelters for those experiencing homelessness, are statutorily exempt under Public Resources Code (PRC) Section 21080(b)(4) as specific actions necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); PRC Section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the projects use "Homeless Housing, Assistance and Prevention Program funds," they are exempt under Governor's Order N-32-20.
2. APPROVE \$4,974,900 for the construction of a Tiny Home Village with 109 beds at 2301 West 3rd Street in Council District 13.
3. APPROVE \$3,808,637 for the construction of a Tiny Home Village with 93 beds at 7570 Figueroa Street in Council District 14.
4. TRANSFER \$4,974,900 for the construction of a Tiny Home Village with 109 beds at 2301 West 3rd Street in Council District 13 from the following accounts:
 - a. \$10,000 from HHAP Grant Special Fund No. 62Y, Account No. 10S650, HHAP Category 1 - A Bridge Home Capital to the Fund No. 62Y, Department No. 10, account number to be determined.
 - b. \$4,964,900 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to Capital Improvement Expenditure Program Fund No. 100/54, a new account entitled "CD 13 3rd Street Pallet Shelters."
5. APPROVE \$1,901,735 from the Homelessness Efforts- County Funding Agreement Fund No. 63Q, Department No. 10, Account 10T618 and transfer to Fund No. 63Q, Department No. 43, account numbers to be determined, for leasing and operating costs to establish a Tiny Home Village with 109 beds at 2301 West 3rd Street in Council District 13:
 - a. Appropriate up to \$85,000 General Services Department Fund No. 100/40, Account No. 006030 for leasing costs through June 30, 2022.

- b. Reserve up to \$306,000 for leasing costs from July 1, 2022 through June 30, 2025.
 - c. Appropriate up to \$1,510,735 for the cost of furniture, fixtures, and equipment (\$5,990) and operations/services through June 30, 2022 (\$1,504,745).
- 6. TRANSFER \$3,808,637 for construction of a Tiny Home Village with 93 beds at 7570 Figueroa Street in Council District 14 from the following accounts:
 - a. \$10,000 from Homeless Housing, Assistance, and Prevention Program (HHAP) Grant Special Fund No. 62Y, Account No. 10S650, HHAP Category 1 -A Bridge Home Capital to the Fund No. 62Y, Department No. 10, account number to be Determined.
 - b. \$354,280 from the Federal Coronavirus Relief Fund No. 63M, Department No. 10, Account No. 10T695 to the Fund No. 63M, Department No. 10, account number to be determined.
 - c. \$3,444,357 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to Capital Improvement Expenditure Program Fund No. 100/54, a new account entitled, "CD 14 Figueroa Pallet Shelters."
- 7. APPROVE \$1,288,934 from Homelessness Efforts- County Funding Agreement Fund No. 63Q, Department No. 10, Account No. 10T618 and transfer to Fund No. 63Q, Department 43, account number to be determined, for the cost of Furniture, Fixtures and Equipment (\$5,069) and operations/services through June 30, 2022 (\$1,283,865) to establish a Tiny Home Village with 93 beds at 7570 Figueroa Street in Council District 14.
- 8. REDUCE the Emergency Shelter Grant (ESG)- COVID allocation for Rapid Rehousing and Shared Housing from \$97,165,429 to \$82,285,920 and reduce the number of approved placements from 3,000 to 2,000 for up to 24 months.
- 9. APPROVE an increase in expenditure authority for the Los Angeles Homeless Services Authority (LAHSA) from \$30,000,000 to \$38,785,035 for up to 2,000 enrolled households through December 31, 2021.
- 10. REPROGRAM 14,879,509 from ESG- COVID Fund No. 517, Account No. 43TCV1, LAHSA Rapid Re-Housing and Shared Housing-CV19 to:
 - a. \$7,352,901 to Fund No. 517, account number to be determined, for operating costs to continue Roadmap interventions.

- b. \$3,371,081 to Fund No. 517, Account No. 43TA43, Homekey Rehab.
 - c. \$4,155,527 to Fund No. 517, Account No. 43TCV2, LAHSA Outreach-CV19.
- 11. APPROVE up to \$36,145,519 for operating costs to continue Roadmap interventions from July 1 2021 through June 30, 2022, as outlined in Attachment 1 of the subject CAO report, dated May 20, 2021, attached to the Council file.
 - a. \$28,792,618 from the Homelessness Efforts- County Funding Agreement Fund No. 63Q, Department No. 10, Account No. 10T618 to Fund No. 63Q, Department No.43, account numbers to be determined.
 - b. \$7,352,901 from ESG- COVID Fund No. 517, account number to be determined, for operating costs to continue Roadmap interventions.
 - c. \$1,140,743 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to the Housing and Community Investment Fund No. 10A/43, account number to be determined.
 - d. \$3,164,986 from the reprogrammed funds in General City Purposes Fund No. 100/56 to the Housing and Community Investment Fund No. 10A/43, account number to be determined.
- 12. APPROVE \$100,164 from the Homelessness Efforts- County Funding Agreement Fund No. 63Q, Department No. 10, Account No. 10T618 to the General Services Department Fund 100/43, Account No. 003180, Construction Materials for rental costs for modular trailer buildings at the El Pueblo A Bridge Home site, July 1, 2021 through June 30, 2022.
- 13. REPROGRAM \$217,390 allocated to the LAHSA to Homelessness Efforts- County Funding Agreement Fund No. 63Q, Account No. 10T618, from the following infeasible Safe Parking sites:
 - a. \$163,042 from 11000 National Boulevard in Council District 5.
 - b. \$54,348 from 2444-2450 Crenshaw Boulevard in Council District 10.
- 14. APPROVE up to \$3,371,081 from ESG - COVID Fund No. 517, account No. 43TA43 for additional rehabilitation costs for the Project Homekey Panorama Inn site, pending the outcome of City's application to the State of California Project CDBG-CV Homekey Notice of Funding Availability as follows:

- a. Appropriate \$871,081 from ESG- COVID Fund No. 517, Account No. 43TA43 to the LAHSA for life safety and accessibility rehabilitation.
 - b. If State of California Community Development Block Grant (CDBG)-CV Project Homekey Notice of Funding Availability funds are not awarded, appropriate the remaining approved amount of up to \$2,500,000 from ESG- COVID Fund No. 517, Account No. 43TA43 to the LAHSA for life safety and accessibility rehabilitation.
15. APPROVE \$347,000 in Federal Coronavirus Relief Fund No. 63M for:
 - a. \$97,000 for the Housing Authority of the City of Los Angeles (HACLA) for Project Homekey real estate services provided under C-137315.
 - b. \$250,000 in additional funding to effectuate the ownership transfer of the Woodman Homekey Site in CD 6 to the National Health Foundation.
16. REPROGRAM \$347,000 from Federal Coronavirus Relief Fund No. 63M, Department No. 10, Account No. 10T695 to the Fund No. 63M, Department No. 10, Account No. 10T617.
17. REQUEST that the LAHSA change the previously approved operator and enter into a sole source contract with First to Serve for \$2,007,500 in ESG - COVID funding to operate 100 beds of interim housing at 1300-1332 West Slauson Avenue, Los Angeles, CA 90044, in Council District 9, July 1, 2021 through June 30, 2022.
18. APPROVE \$4,155,527 in ESG - COVID Fund No. 517, Account No. 43TCV2 for the LAHSA Roadmap Outreach Teams for outreach to the Roadmap's target population, July 1, 2021 through June 30, 2022.
19. APPROVE \$199,175 to augment the existing letter of agreement (C-137223) between the Los Angeles County Department of Health Services and the City Administrative Officer (CAO) for real estate services.
20. APPROVE \$199,175 from HHAP Category 7- Administrative Costs to General Fund No.100, Department 10, Account No. 003040, Contractual Services for the CAO to augment the existing letter of agreement (C-137223) between the Los Angeles County Department of Health Services and the CAO for real estate evaluation and architectural services, July 1, 2021 through June 30, 2022.
21. AUTHORIZE the CAO to amend its letter of agreement (C-137223) with the Los Angeles County Department of Health Services for real estate services to authorize the addition of three (3) one-year extensions.

22. TRANSFER \$171,100 from Capital Improvement Expenditure Program Fund No. 100/54, Account No.00S705, Bridge Housing - Lafayette and Western to Bureau of Engineering (BOE) Fund No. 100/78, Account No. 001010, Salaries General for reimbursement of salary expenses incurred during construction of the Lafayette and Western A Bridge Home sites.
23. REPROGRAM \$3,164,985.90 in savings to the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to reserve for construction costs for future COVID-19 Homelessness Roadmap sites from:
- a. \$1,361,482.78 from the Capital Improvement Expenditure Program Fund No. 54, Account No. 00R678 - Bridge Housing, Beacon Street.
 - b. \$1,701,802.32 from the Capital Improvement Expenditure Program Fund No. 54, Account No. 00S705 - Bridge Housing, Eubank Street.
 - c. \$101,700.80 from funds allocated for the A Bridge Home site at 1553 Schrader Boulevard in CD 13 as follows:

Fund/Department	Account No.	Title	Amount
100/40 General Services Department	001101	Hiring Hall Construction	\$10,990
100/40 General Services Department	001121	Benefits Hiring Hall Construction	\$12,995
100/40 General Services Department	003180	Construction Materials	\$75,715.80
100/40 General Services Department	001191	Overtime Hiring Hall Construction	\$2,000

24. REAPPROPRIATE \$3,164,985.90 reprogrammed funding in the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 and reserve these funds for future COVID-19 Homelessness Road map costs.
25. TRANSFER \$27,268.64 from Capital Improvement Expenditure Program Fund No.100/54 to the BOE Fund No. 100/78, Account No. 001010, General Salaries for the salaries associated with the constructions for the following sites in Council District 15:
- a. \$7,274.22 for A Bridge Home site at 515 North Beacon Street.

- b. \$19,994.42 for A Bridge Home site at 828 Eubank Avenue.
26. REAPPROPRIATE up to \$7,936,416 in unexpended funds from various funding sources to Capital Improvement Expenditure Program Fund No. 100/54 and the BOE Fund No. 100/78 for the Roadmap Projects as follows:
- a. \$5,119,932 from the Community Development Block Grant-COVID (CDBG-COVID) Fund No. 424, Account No. 43T9CV, CV-19 Pallet Shelters to Capital Improvement Expenditure Fund No. 100/54, Account No. 00T772 for the construction of a Tiny Home Village at Arroyo Seco (Arroyo Drive and Avenue 60) in Council District 14.
 - b. \$230,557 from HHAP Category 1 -A Bridge Home Capital to Capital Improvement Expenditure Fund No. 100/54 for site prep and hygiene trailer maintenance of a Safe Sleep Village at 317 North Madison Avenue in Council District 13.
 - c. \$1,885,927 from various Federal Coronavirus Relief Fund project accounts to the BOE for general salaries associated with the construction costs of previously approved interim housing sites.
 - d. \$700,000 from the Federal Coronavirus Relief Fund No. 63M, Department No. 10, Account No. 10T178 to the BOE Fund No. 100/78, Account No. 003040, contractual services associated with the Roadmap Project.
27. INSTRUCT the General Manager, Housing and Community Investment Department, or designee, to amend Roadmap Contract No. C-137223 and/or the City's 2021-22 General Fund Contract with the LAHSA, as described in this report to:
- a. Reflect the service funding allocations in this report for:
 - i. 7570 Figueroa Street.
 - ii. 2301 West 3rd Street.
 - iii. Road map sites described in Attachment 1 in the subject CAO report, attached to the Council file.
 - iv. Roadmap outreach.
 - b. Reduce funding for rapid rehousing and shared housing from \$97,165,429 to \$82,285,920 and reduce the number of approved placements from 3,000 to 2,000.

- c. Increase expenditure authority for rapid rehousing and shared housing from \$30,000,000 to \$38,785,035 for up to 2,000 enrolled households through December 31, 2021.
- d. Increase rehabilitation funding for the Project Homekey Panorama Inn site in the amount of \$871,081.
- e. If State of California Community Development Block Grant (CDBG)- COVID Project Homekey Notice of Funding Availability (NOFA) funds are not awarded, increase rehabilitation funding for the Project Homekey Panorama Inn site in the amount of \$2,500,000.
- f. Decrease the following programs by \$217,390 as follows:
 - i. Safe Parking at 11000 National Boulevard - \$163,042.
 - ii. Safe Parking at 2444-2450 Crenshaw Boulevard - \$54,348.

28. INSTRUCT the City Clerk to place on the agenda of the first regular Council meeting on July 1, 2021, or shortly thereafter, the following instructions:

- a. Transfer \$3,097,357 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to Capital Improvement Expenditure Program Fund No. 100/54, a new account entitled, "CD 14 Figueroa Pallet Shelters".
- b. Transfer \$4,964,900 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to Capital Improvement Expenditure Program Fund No. 100/54, a new account entitled, "CD 13 3rd Street Pallet Shelters".
- c. Transfer \$85,000 from the Homelessness Efforts - County Funding Agreement Fund No. 63Q, Department No. 10, Account 10T618 to General Services Department Fund No. 100/40, Account No. 006030 for leasing costs through June 30, 2022.
- d. Transfer \$1,228,565 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to Capital Improvement Expenditure Program Fund No. 100/54, account number to be determined, for site prep and hygiene trailer and administrative offices procurement.
- e. Transfer \$27,027 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to the General Fund 100 Department of General Services, No. 40, Account No. 003040, Contractual Services for hygiene

station rental services.

- f. Transfer \$199,175 from HHAP Category 7- Administrative Costs to General Fund No. 100, Department 10, Account No. 003040, Contractual Services for the CAO to augment the existing letter of agreement.
- g. Transfer \$100,164 from the Homelessness Efforts - County Funding Agreement Fund No. 63Q, Department No. 10, Account No. 10T618 to the General Services Department Fund No. 100/43, Account No. 003180, Construction Materials for rental costs for modular trailer buildings at the El Pueblo A Bridge Home site through June 30, 2022.
- h. Reappropriate \$3,164,985.90 reprogrammed funding in the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 and reserve these funds for future COVID-19 Homelessness Roadmap costs.
- i. Reappropriate up to \$7,936,416 in unexpended funds from various funding sources to Capital Improvement Expenditure Program Fund No. 100/54 and the BOE Fund No. 100/78 for the Roadmap Projects as follows:
 - i. \$5,119,932 from the Community Development Block Grant-COVID (CDBG-COVID) Fund No. 424, Account No. 43T9CV, CV-19 Pallet Shelters to Capital Improvement Expenditure Fund No. 100/54, Account No. 00T772 for the construction of a Tiny Home Village at Arroyo Seco (Arroyo Drive and Avenue 60) in Council District 14.
 - ii. \$230,557 from HHAP Category 1 - A Bridge Home Capital to Capital Improvement Expenditure Fund No. 100/54 for site prep and hygiene trailer maintenance of a Safe Sleep Village at 317 North Madison Avenue in Council District 13.
 - iii. \$1,885,927 from various Federal Coronavirus Relief Fund project accounts to the BOE for general salaries associated with the construction costs of previously approved interim housing sites.
 - iv. \$700,000 from the Federal Coronavirus Relief Fund No. 63M, Department No. 10, Account No. 10T178 to the BOE Fund No. 100/78, Account No. 003040, contractual services associated with the Roadmap Project.

29. AUTHORIZE the CAO to:

- a. Prepare Controller instructions or make necessary technical adjustments, including to the names of the Special Fund accounts recommended for the subject CAO report, to implement the intent of these transactions, and authorize

the Controller to implement these instructions.

- b. Prepare any additional Controller instructions to reimburse City Departments for their accrued labor, material or permit costs related to projects in the subject CAO report, to implement the intent of these transactions, and authorize the Controller to implement these instructions.

Fiscal Impact Statement: The CAO reports that there is no impact to the General Fund as a result of the recommendations in the subject CAO report, dated May 20, 2021, at this time. The recommendations in the CAO report will be funded with the City General Fund previously approved for homeless interventions, CARES Act and the County of Los Angeles service fundings commitment in Fiscal Year 2020-21 and FY 2021-22. Beginning FY 2022-23, the estimated annual cost of the City share of ongoing operations/services costs for currently approved Roadmap interventions is estimated at \$43,763,135. Funding for these costs could be covered by State HHAP and HHAP 2 grants.

Financial Policies Statement:

The recommendations in the subject CAO report comply with the City Financial Policies.

Community Impact Statement: None submitted.

(Ad Hoc Committee on COVID-19 Recovery and Neighborhood Investment waived consideration of the above matter)

SUMMARY:

At a regular meeting held on May 27, 2021, the Homelessness and Poverty Committee considered a BOE report and Statutory Exemption from the CEQA pursuant to Section 15269(c); and under PRC section 21080(b)(4) as a specific actions necessary to prevent or mitigate an emergency; as set forth in the Notice of Exemption for Council District (CD) 14 for 7570 North Figueroa Street and CD 13 for 2301 West 3rd Street; and a CAO report relative to the sixth report regarding the COVID-19 Homelessness Roadmap funding recommendations. Before the discussion, a technical correction was added to highlight the omission of the BOE report dated May 20, 2021 in the agenda description. After providing an opportunity for public comment, the Committee recommended to adopt as amended, the BOE and CAO reports. This matter is now submitted to the Council for consideration.

Respectfully submitted,

HOMELESSNESS AND POVERTY COMMITTEE

MEMBER	VOTE
--------	------

RIDLEY-THOMAS:	YES
DE LEON:	YES
BUSCAINO:	YES
RODRIGUEZ:	YES
RAMAN:	YES

LC 05/27/21

**BOARD OF PUBLIC WORKS
MEMBERS**

GREG GOOD
PRESIDENT

AURA GARCIA
VICE PRESIDENT

DR. MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE

JESSICA M. CALOZA
COMMISSIONER

M. TERESA VILLEGAS
COMMISSIONER

DR. FERNANDO CAMPOS
EXECUTIVE OFFICER

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

**DEPARTMENT OF
PUBLIC WORKS**

**BUREAU OF
ENGINEERING**

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

May 20, 2021

The Honorable Nury Martinez
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

CRISIS AND BRIDGE HOUSING FACILITIES - CD 14 EAGLE ROCK TINY HOME VILLAGE HOMELESS SHELTER AT 7570 N. FIGUEROA STREET AND CD 13 WESTLAKE TINY HOME VILLAGE HOMELESS SHELTER AT 2301 W. 3RD ST. (C.F. 20-0841) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF EXEMPTION (NOEs)

Dear President Martinez and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the construction of two bridge housing facilities, tiny home village homeless shelters, to provide crisis shelter services on Assessor Parcel Numbers (APNs) 5691-017-902 and 5691-017-904 at 7570 North Figueroa Street in Council District 14 and on Portion of APN 5154-017-017 at 2301 West 3rd Street, in Council District 13.

RECOMMENDATION

Staff recommends that Council determine the Crisis and Bridge Housing projects at 7570 North Figueroa Street and 2301 West 3rd Street, which allow for the lease, construction, and use of these properties as temporary shelters for those experiencing homelessness, are statutorily exempt under Public Resources Code Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters; and, because the projects use "Homeless Housing, Assistance and Prevention Program funds," they are exempt under Governor's Order N-32-20. Please refer to the attached NOEs.

Honorable Nury Martinez
May 20, 2021
Page 2 of 2

If you have any questions, please contact Maria Martin at Maria.Martin@lacity.org or (213) 485-5753.

Sincerely,



Gary Lee Moore, PE, ENV SP
City Engineer

Attachments

GLM/JF/mem:ab
Q:\GLM\City Engineer\GLM Signed Documents\2021
Documents\TRANSMITTAL_CF20-0841_TinyHomeVillages_7570_N_Figueroa_St
_and_2301_W_3rd_St_05-20-21.pdf

cc: Deborah Weintraub, Bureau of Engineering
Jose Fuentes, Bureau of Engineering
Marina Quinones, Bureau of Engineering
Maria Martin, Bureau of Engineering

ATTACHMENTS

1. Notice of Exemption (NOE) CD 14 - Eagle Rock Tiny Home Village Homeless Shelter – 7570 N Figueroa St
2. Notice of Exemption (NOE) CD 13 - Westlake Tiny Home Village Homeless Shelter – 2301 W 3rd St

ATTACHMENT 1

Notice of Exemption (NOE)

CD 14 - Eagle Rock Tiny Home Village Homeless Shelter – 7570 N Figueroa St

COUNTY CLERK'S USE

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III – City CEQA Guidelines)

This form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, and the Office of Planning and Research pursuant to Public Resources Code Sections 21080.27(c) and 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, MS 939, Los Angeles, CA 90015	COUNCIL DISTRICT 14
PROJECT TITLE: CD 14 - Eagle Rock Tiny Home Village Homeless Shelter – 7570 N Figueroa St	LOG REFERENCE C.F. 20-0841

PROJECT LOCATION: Assessor Parcel Numbers (APNs) 5691-017-902 and 5691-017-904, 7570 North Figueroa Street, in the Northeast Los Angeles Community Plan Area in the City of Los Angeles Council District 14 (CD 14), see *Figure 1 – Project Location* and the attached Project Site Plan. T.G. 565 D5

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT The proposed project consists of the construction of a new homeless shelter at a City of Los Angeles, County of Los Angeles, and Southern California Edison owned property (three lots) that includes a tiny home village consisting of small, detached, pre-fabricated cabins assembled on site with beds for up to 93 individuals. The purpose of the project is to provide emergency shelter for individuals experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The project includes approximately 48 tiny homes; 45 with double beds (90 occupants); three with Americans with Disabilities Act (ADA) compliant single beds (3 occupants); one tiny home for storage that has no beds; two hygiene trailers with restrooms, showers, lavatories, drinking fountains; designated seating areas for food services; lockers, staff parking; perimeter fencing; utilities; a new pedestrian ramp; and other minor repairs and improvements as needed. The prefabricated structures include the 48 tiny homes, two administration offices, two hygiene trailers, one laundry facility, one storage shed, and a guard booth. The Project Site is approximately 42,900-square feet (sf) and is currently developed as a parking lot. Project beneficiaries include the homeless community, the public, and local businesses. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. (Please see the attached narrative for more details). On _____, 2021, the Los Angeles City Council determined this action was exempt from CEQA and approved the project.

CONTACT PERSON: Maria Martin **TELEPHONE NUMBER:** (213) 485-5753

EXEMPT STATUS: (Check One)	<u>CITY CEQA</u>	<u>STATE CEQA</u>	<u>CA PUBLIC</u>
	<u>GUIDELINES</u>	<u>GUIDELINES</u>	<u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27
<input checked="" type="checkbox"/> Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".			

JUSTIFICATION FOR PROJECT EXEMPTION: This project is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the project uses "Homeless Housing, Assistance and Prevention Program funds," it is exempt under Governor's order N-32-20 (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING			
SIGNATURE: <div style="text-align: center;">Maria Martin</div>	TITLE: Environmental Affairs Officer	DATE: 	
FEE: \$75.00 _____	RECEIPT NO. 	REC'D BY 	DATE

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1. EXEMPTION NARRATIVE

The proposed project includes the construction of a new homeless shelter that will provide emergency shelter, two hygiene trailers, storage, and food services for people experiencing homelessness. The project site is approximately 42,900 sf in size comprised of three lots that are currently City, County, and Public Utility owned and developed as an asphalt-paved parking lot. The Eagle Rock Park is across Figueroa Street to the west of the project site and the Ventura (134) Freeway is located to the north, east, and south of the project site (City of Los Angeles Department of City Planning, 2021).

The project includes the construction of a new homeless shelter facility that includes tiny homes with beds for up to 93 individuals experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. Tiny homes are small, detached, pre-fabricated cabins made of aluminum and composite materials that will be assembled on site. The project includes approximately 48 tiny homes; 45 with double beds (90 occupants) and three with ADA single beds.

The facility includes two administration offices, a guard booth, outdoor lighting, perimeter fencing, hygiene trailers with restrooms, showers, lavatories, drinking fountains, gates, a trash bin area, outdoor seating, utilities, new asphalt paving, staff parking, site lighting, a food distribution area, designated seating areas for food services, a new pedestrian ramp, and lockers. No trees will be removed.

The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to Crisis Housing Program for All Populations Scope of Required Services (LAHSA, 2020-2021). A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The project site is within an urban area on a parcel that is currently developed with an asphalt paved parking lot. The project site is zoned PF-1 with a Public Facilities land use designation. The site is surrounded by open space, a City park, and various components of the Ventura Freeway, both uses are considered public institutional uses. As shown in Figure 1, below, there is a combination of qualified urban uses that are adjacent to the site. The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses. The entire perimeter of the parcel is surrounded by qualified urban uses. Therefore, the parcel meets the definition of infill site.

I. PROJECT HISTORY: HOMELESS SHELTER CRISIS AND EMERGENCY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabalski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the *New England Journal of Medicine* found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, *Hospitalization Costs Associated with Homelessness in New York City*, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, but is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, , 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu,, Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City of Los Angeles (the City) City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020):

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA recently published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

<p style="text-align: center;">Table 3 2020 Homeless Count Data Summary</p>		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

"We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19," said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. "It is important that we act now to protect this population and the compassionate people who serve them." (Corey Egel, 2020).

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations "with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness." (California Dept. of Public Health, 2020) Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the "need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19." (Governor Gavin Newsom, 2020) On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor has stated that "[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19," and "California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19." (California Governor, Press Release (Governor Gavin Newsom, 2020))

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted "in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials." (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools.

(Mayor Eric Garcetti, 2020)

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live. (The Honorable Judge David O. Carter, 2020) Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

II. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply
 - (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or
 - (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt under the Governor’s Executive Order No. N-32-20, Suspending CEQA

On March 18, 2020, Governor Newsom signed and issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020) suspending CEQA and the CEQA Guidelines’ requirements “for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89, signed on March 17, 2020.” The Governor noted that “strict compliance with the various statutes and regulations specified in this order would prevent, hinder, or delay appropriate actions to prevent and mitigate the effects of the COVID-19 pandemic.” Because this project qualifies for and will use Homeless Housing,

Assistance, and Prevention Program funds for at least a portion of the work at the site," it is exempt from CEQA under the Governor's suspension order.

C. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019)

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of "Low Barrier Navigational Center" in Government Code Section 65660, which defines Low Barrier Navigation Center as a "Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this project for a "service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing." This project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The shelter will be operated by service providers coordinated with the Los Angeles Homeless

Services Authority (LAHSA). The intention of this emergency shelter project is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing

homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this project, are never mandatory and cannot be a condition of obtaining the housing intervention. This project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as

for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this project, meet these requirements.

The project provides approximately 45 pallets which allow for presence of partners. This project is pet friendly. Participants are allowed to bring their pets to the shelter and live with them inside their room. There is no pet play area onsite. The project has storage within each room for personal possessions. The project is designed to provide privacy to participants by providing each family or individual with their own room. There are private living quarters with both private or communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This project meets that requirement. As noted above, the project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the family or individual's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)

- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry system Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site..." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The project site is a City of Los Angeles, County of Los Angeles, and Southern California Edison owned property, approximately 42,900 sf in size. The project site is surrounded by qualified urban uses, specifically public institutional uses, the Eagle Rock Park is across Figueroa Street to the west of the project site and the Ventura (134) Freeway and associated uses are located to the north, east, and south of the project site. At least 75% of the perimeter of the parcel is surrounded by qualified urban uses, both of which are considered a public institutional use. Therefore, the

parcel meets the definition of infill site. (City of Los Angeles Department of City Planning, 2021) Therefore, the project parcel and site are surrounded by urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D)) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The project is funded, at least in part, through State of California Homeless Housing, Assistance and Prevention Program (HHAP) and Coronavirus Relief Fund (CRF) for the improvements. The City also has determined that the project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this project if such funding becomes available, which further qualifies this project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement is met.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." The project includes the construction of a new homeless shelter site that includes tiny homes and operating an emergency shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles, and qualify for exemption from CEQA under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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ATTACHMENT 2

Notice of Exemption (NOE)

CD 13 - Westlake Tiny Home Village Homeless Shelter – 2301 W 3rd St

COUNTY CLERK'S USE

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III – City CEQA Guidelines)

This form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, and the Office of Planning and Research pursuant to Public Resources Code Sections 21080.27(c) and 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, MS 939, Los Angeles, CA 90015	COUNCIL DISTRICT 13
PROJECT TITLE: CD 13 - Westlake Tiny Home Village Homeless Shelter – 2301 W 3rd St	LOG REFERENCE C.F. 20-0841

PROJECT LOCATION: Portion of Assessor Parcel Number (APN) 5154-017-017, 2301 West 3rd Street, in the Westlake Community Plan Area in the City of Los Angeles Council District 13 (CD 13), see *Figure 1 – Project Location* and Attached Site Plan. T.G. 634 C2

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT The proposed project consists of the construction of a new homeless shelter on a portion of a privately-owned property that includes a tiny home village consisting of small, detached, pre-fabricated cabins assembled on site with beds for up to 109 individuals. The purpose of the project is to provide emergency shelter for individuals experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The project includes approximately 56 tiny homes; 53 with double beds (106 occupants), three with Americans with Disabilities Act (ADA) compliant single beds (three occupants), administration offices, two hygiene mobile units with restrooms, showers, lavatories, drinking fountains; designated seating areas for food services, pet relief area, staff parking, lockers, perimeter fencing, utilities, guard station, and other minor repairs and improvements as needed. The project site is approximately 22,000-square feet (sf) and is currently developed as a dirt lot. Project beneficiaries include the homeless community, the public, and local businesses. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. (Please see the attached narrative for more details). On _____, 2021, the Los Angeles City Council determined this action was exempt from CEQA and approved the project.

CONTACT PERSON: Maria Martin **TELEPHONE NUMBER:** (213) 485-5753

EXEMPT STATUS: (Check One)	CITY CEQA <u>GUIDELINES</u>	STATE CEQA <u>GUIDELINES</u>	CA PUBLIC <u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27

☒ Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".

JUSTIFICATION FOR PROJECT EXEMPTION: This project is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the project uses "Homeless Housing, Assistance and Prevention Program funds," it is exempt under Governor's order N-32-20 (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: <div style="text-align: right;">Maria Martin</div>	TITLE: Environmental Affairs Officer	DATE:
FEE: \$75.00 _____	RECEIPT NO. 	REC'D BY
		DATE

DISTRIBUTION: (1) County Clerk (2) Agency Record

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1. EXEMPTION NARRATIVE

The proposed project includes the construction of a new homeless shelter that will provide emergency shelter, two hygiene trailers, storage, and food services to people experiencing homelessness. The project site is on an approximately 22,000 sf rectangular portion of a privately owned parcel identified with APN 5154-017-017 (City of Los Angeles Department of City Planning, 2021). The project site is currently developed with an unpaved dirt lot.

The project includes the construction of a new homeless shelter facility that includes tiny homes with beds for up to 109 individuals experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. Tiny homes are small, detached, pre-fabricated cabins made of aluminum and composite materials that will be assembled on site. The project includes approximately 56 tiny homes; 53 with double beds (106 occupants) and three with ADA single beds (three occupants).

The facility includes four administration offices, a guard station, outdoor lighting, perimeter fencing, two hygiene mobile units with restrooms, showers, lavatories; drinking fountains, gates, a trash bin area, outdoor seating, utilities, new asphalt paving, staff parking, site lighting, a food distribution area, designated seating areas for food services, a pet area, and lockers. No trees will be removed.

The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to Crisis Housing Program for All Populations Scope of Required Services (LAHSA, 2020-2021). A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The project site is within an urban area on a parcel that is currently developed with a dirt lot. The project site is zoned C2-1 with a Highway Oriented Commercial land use designation. As shown in Figure 1, below, the site is surrounded by qualified urban uses that are adjacent to the site. The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses. There are multi-family residential uses to the north and commercial uses to the south, west, and south of the parcel. The entire perimeter of the parcel is surrounded by qualified urban uses. Therefore, the parcel meets the definition of infill site.

I. PROJECT HISTORY: HOMELESS SHELTER CRISIS AND EMERGENCY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabitski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, but is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Coroner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on

October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu, Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City of Los Angeles (the City) City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020):

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA recently published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

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2020 Homeless Count Data Summary

	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

"We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19," said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. "It is important that we act now to protect this population and the compassionate people who serve them." (Corey Egel, 2020)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations "with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness." (California Dept. of Public Health, 2020) Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the "need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19." (Governor Gavin Newsom, 2020) On March 18,

2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor has stated that "[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19," and "California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19." (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted "in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials." (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools.

(Mayor Eric Garcetti, 2020)

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

II. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply
 - (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or
 - (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt under the Governor’s Executive Order No. N-32-20, Suspending CEQA

On March 18, 2020, Governor Newsom signed and issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020) suspending CEQA and the CEQA Guidelines’ requirements “for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89, signed on March 17, 2020.” The Governor noted that “strict compliance with the various statutes and regulations specified in this order would prevent, hinder, or delay appropriate actions to prevent and mitigate the effects

of the COVID-19 pandemic.” Because this project qualifies for and will use Homeless Housing, Assistance, and Prevention Program funds for at least a portion of the work at the site,” it is exempt from CEQA under the Governor’s suspension order.

C. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019)

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the project’s programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor’s safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The shelter will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter project is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery

from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this project, are never mandatory and cannot be a condition of obtaining the housing intervention. This project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry,

including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this project, meet these requirements.

The project provides approximately 53 pallets which allow for presence of partners. This project is pet friendly. Participants are allowed to bring their pets to the shelter and live with them inside their room. There is a pet area onsite. The project has storage within each room for personal possessions. The project is designed to provide privacy to participants by providing each family or individual with their own room. There are private living quarters with both private or communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This project meets that requirement. As noted above, the project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the family or individual's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)

- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry system Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site..." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The project site is on an approximately 22,000 sf rectangular portion of a privately owned parcel identified with APN 5154-017-017. The project site is currently developed with an unpaved dirt lot. The site has frontage on 3rd Street. The project site is zoned C2-1 with a Highway Oriented Commercial land use designation. As shown in Figure 1, the site is surrounded by qualified urban uses that are adjacent to the site. The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses. There are multi-family residential uses to the north and

commercial uses to the south, west, and south of the parcel. At least 75% of the perimeter of the parcel is surrounded by qualified urban uses. Therefore, the parcel meets the definition of infill site. (City of Los Angeles Department of City Planning, 2021) Therefore, the project parcel and site are surrounded by urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The project is funded, at least in part, through State of California Homeless Housing, Assistance and Prevention Program (HHAP) for the improvements. The City also has determined that the project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this project if such funding becomes available, which further qualifies this project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement is met.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." The project includes the construction of a new homeless shelter site that includes tiny homes and operating an emergency shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles, and qualify for exemption from CEQA under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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RMM Decl.
Exhibit 66

RMM Decl.
Exhibit 66

HOLLY L. WOLCOTT
CITY CLERK

City of Los Angeles
CALIFORNIA

OFFICE OF THE
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER



ERIC GARCETTI
MAYOR

Council and Public Services Division

200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213)978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.ORG

September 29, 2021

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 20-0841

Council Meeting Date: September 29, 2021

Agenda Item No.: 35

Agenda Description: CONTINUED CONSIDERATION OF STATUTORY EXEMPTION and HOMELESSNESS AND POVERTY COMMITTEE REPORT relative to COVID-19 Homelessness Roadmap funding.

Council Action: HOMELESSNESS AND POVERTY COMMITTEE REPORT - ADOPTED ITEM FORTHWITH

Council Vote:

YES	Blumenfield	YES	Bonin	YES	Buscaino
YES	Cedillo	YES	de León	YES	Harris-Dawson
ABSENT	Koretz	YES	Krekorian	YES	Lee
YES	Martinez	YES	O'Farrell	YES	Price
YES	Raman	ABSENT	Ridley-Thomas	YES	Rodriguez

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 341

FILE SENT TO MAYOR
LAST DAY FOR MAYOR TO ACT

09/29/2021

10/12/2021

APPROVED

9/30/2021

DATE SIGNED

Adopted Report(s) Title

20-0841 Amending Motion (Raman for Ridley-Thomas - Martinez) dated 9-28-21
Report from the Homelessness and Poverty Committee_9-9-21

MOTION

I **MOVE** that the matter of the City Administrative Officer Report relative to the Eighth report regarding the COVID-19 Homelessness Roadmap funding recommendations, Item No. 16 on today's agenda (C.F. 20-0841) **BE AMENDED** to:

Strike Recommendations 17.a., 17.b., 17.c., 19, and 31.a.

Add the following recommendations:

34. APPROVE \$234,213 for the Weingart Access Center, which are site-based facilities where people experiencing or at risk of homelessness gain initial access to, or continue contact with, Coordinated Entry System in Skid Row area through June 30, 2022:

- a. TRANSFER \$234,213 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to Los Angeles Housing Department Fund No. 10A/43, a new account entitled, "CD 14 Weingart Access Center";
- b. REQUEST that Los Angeles Homeless Services Authority execute a new or amend an existing sole source subcontract with Weingart for the above Weingart Access Center in Council District 14 and add in the amount of \$234,213 to provide services; and
- c. INSTRUCT the General Manager of the Los Angeles Housing Department, or designee, to amend the City's 2021-22 General Fund contract with the Los Angeles Homeless Services Authority, C-138630, to increase the operating funding for the above Weingart Access Center in the amount of \$234,213;

35. APPROVE \$89,089.61 for modular storage services at a Project Roomkey site at Airtel Hotel in Council District 6 through March 31, 2022:

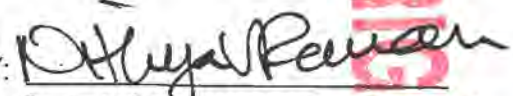
- a. TRANSFER \$89,089.61 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to Los Angeles Housing Department Fund No. 10A/43, a new account entitled, "CD 6 Airtel PRK Storage Project";
- b. REQUEST that Los Angeles Homeless Services Authority execute a new or amend an existing sole source subcontract with Chrysalis for the modular storage services in Council District 6 and add in the amount of \$89,089.61 to provide services; and
- c. INSTRUCT the General Manager of the Los Angeles Housing Department, or designee, to amend the City's Homeless Housing, Assistance and Prevention contract with contract with the Los Angeles Homeless Services Authority, C-135650, to increase the operating funding for the above modular storage services in the amount of \$89,089.61;



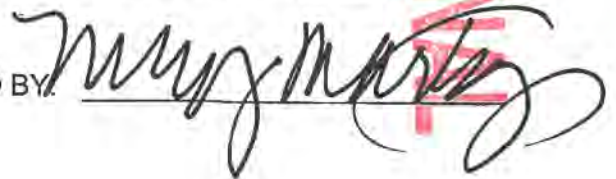
36. APPROVE up to \$733,040 for the cost of operations for an interim housing facility with 49 beds at 7816 Simpson Avenue in Council District 6 through June 30, 2022:
- TRANSFER up to \$733,040 from Fund No. 517, Account No. 43VC9V to Fund No. 517, Account No. 43TB32 for the cost of operations for an interim housing facility with 49 beds at 7816 Simpson Avenue in Council District 6; and
 - REQUEST that Los Angeles Homeless Services Authority execute a new or amend an existing sole source subcontract with LA Family Housing for the interim housing facility operations in Council District 6 and add in the up to amount of \$733,040 to provide services;
37. APPROVE \$900,000 from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to the Office of City Administrative Officer Fund No. 100/10, Account No. 003040 to fund Multi-disciplinary Teams in Council Districts 2 and 3 through the contract with the Los Angeles County Department of Health Services:
- AUTHORIZE the City Administrative Officer to execute a new or amend an existing letter of agreement with the Los Angeles County Department of Health Services (C-132815) for Multi-disciplinary Teams in Council Districts 2 and 3 and add in the amount of \$900,000 to provide services;
38. APPROVE \$638,031 additional funding from the Additional Homeless Services General City Purposes Fund No. 100/56, Account No. 000931 to Capital Improvement Expenditure Program Fund No. 100/54, Account No. 00T833, for site preparation and hygiene trailer and administrative offices procurement for a Safe Sleep Village at 2300 S. Central Avenue in Council District 9:
- TRANSFER up to \$1,180,501 from Capital Improvement Expenditure Program Fund No. 100/54, Account No. 00T833 to General Service Department Fund No. 100/40, various accounts as needed for site preparation and hygiene trailer and administrative offices procurement for a Safe Sleep Village at 2300 S. Central Avenue in Council District 9;
39. APPROVE up to \$272,655 additional funding to augment the existing letter of agreement between the Los Angeles County Department of Health Services and Office of the City Administrative Officer for real estate evaluation and architectural services at through June 30, 2022:
- TRANSFER up to \$54,860 from State of California Homeless Housing, Assistance and Prevention (HHAP) Program Category 7 - Administrative Costs to HHAP Fund No. 62Y/10, account number to be determined;
 - TRANSFER up to \$217,795 from Emergency Solutions Grant (ESG) - COVID Fund No. 517, Account No. 43VC9V to Fund No. 517, Account No. 43TA43, Homekey Rehab;
 - TRANSFER up to \$217,795 in Emergency Solutions Grant (ESG) - COVID funds transferred from the Los Angeles Homeless Services Authority to the City Administrative Officer Fund No. 100/10, Account No. 003040;

- d. REQUEST that the Los Angeles Homeless Service Authority transfer Emergency Solutions Grant (ESG) - COVID funds in the amount of \$217,795 to the City Administrative Officer to fund these activities through the Los Angeles Department of Health Services; and
 - e. AUTHORIZE the Office of the City Administrative Officer to amend its contract with the Los Angeles County Department of Health Services (C-132815) for real estate evaluation and architectural services and add in the up to amount of \$272,655 to provide services;
40. REPROGRAM up to \$1,148,211 from Emergency Solutions Grant (ESG) - COVID Fund No. 517, Account No. 43TA42 allocated for the cost of operations and services to Fund No. 517, Account No. 43TA43, Homekey Rehab for Project Homekey capital costs at Travelodge Normandie in Council District 15;
41. REPROGRAM up to \$2,394,315 from Emergency Solutions Grant (ESG) - COVID Fund No. 517, Account No. 43TA42 allocated for the cost of operations and services for a Project Homekey site at Panorama Motel in Council District 6 to Fund No. 517, Account No. 43VC9V, COVID-19 Homeless Roadmap for future COVID-19 Homelessness Roadmap costs;
42. INSTRUCT the General Manager, Housing and Community Investment Department, or designee, to amend the Roadmap Contract No. C-137223 with the Los Angeles Homeless Services Authority to:
- a. Reflect the service funding allocations for 7816 Simpson Avenue;
 - b. Increase the capital funding for Project Homekey Owner/Operator contracts up to \$1,366,006 as described in the motion;
 - c. Decrease Project Homekey Owner/Operator Services up to \$3,542,526 as described in the motion; and
 - d. Decrease the Safe Parking site at 15380 Oxnard Street by \$352,590.

PRESENTED BY:


FOR MARK RIDLEY-THOMAS

SECONDED BY:



STATUTORY EXEMPTION and HOMELESSNESS AND POVERTY COMMITTEE REPORT
relative to COVID-19 Homelessness Roadmap funding.

Recommendations for Council action, SUBJECT TO THE APPROVAL OF THE MAYOR:

1. DETERMINE the Crisis and Bridge Housing facilities at Assessor's Parcel No. (APN) 5118015900, between Compton Avenue and Nevin Avenue, and near 9700 San Fernando Road, which allow for lease, construction of new homeless shelters, and the operation as temporary homeless shelters for those experiencing homelessness, are statutorily exempt under Public Resources Code (PRC) Section 21080(b)(4) as specific actions necessary to prevent or mitigate an emergency as reflected in California Environmental Quality Act (CEQA) Guideline Section 15269(c); PRC Section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the projects use "Homeless Housing, Assistance and Prevention Program funds," they are also exempt under Governor's Order N-32-20.
2. APPROVE the recommendations in the City Administrative Officer (CAO) report dated September 2, 2021, attached to the Council file.

Fiscal Impact Statement: The CAO reports that there is no impact to the General Fund as a result of the recommendations in the subject CAO, dated September 2, 2021, at this time. The recommendations in the CAO report will be funded with the City General Fund approved for homeless interventions, CARES Act, State of California Homeless Housing, Assistance and Prevention (HHAP) Program, and the County of Los Angeles service funding commitment in Fiscal Year (FY) 2021-22. Beginning in FY 2022-23, the estimated annual cost of the City share of ongoing operations/services costs for the currently approved Roadmap interventions is estimated at \$50,722,340 and \$8,890,800 for A Bridge Home beds, a total of \$ 59,613,140. Funding for these costs could be covered by State HHAP grants.

Financial Policies Statement: The CAO reports that the recommendations in the subject CAO report comply with the City Financial Policies.

Community Impact Statement: None submitted.

**(Ad Hoc Committee on COVID-19 Recovery and Neighborhood Investment Committee
waived consideration of the above matter)**

SUMMARY:

At a regular meeting held on September 9, 2021, the Homelessness and Poverty Committee considered Statutory Exemption, Department of Public Works (DPW) - Bureau of Engineering (BOE), and CAO reports relative to CEQA analysis and recommendation that the CD 9 Tiny

Home Village Homeless Shelter at Compton Avenue and Nevin Avenue and the Council District 6 Tiny Home Village at 9700 San Fernando Road homeless shelter projects be determined to be statutorily exempt under PRC Section 21080(b)(4) as specific actions necessary to prevent or mitigate an emergency as reflected in CEQA Guideline Section 15269(c); PRC Section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the projects use "Homeless Housing, Assistance and Prevention Program funds," are also exempt under Governor's Order N-32-20; and, the Eighth report regarding the COVID-19 Homelessness Roadmap funding recommendations.

After providing an opportunity for public comment, the Committee recommended to approve on consent the BOE and CAO reports. This matter is now submitted to the Council for consideration.

Respectfully submitted,



HOMELESSNESS AND POVERTY COMMITTEE

MEMBER	VOTE
RIDLEY-THOMAS:	YES
DE LEÓN:	YES
BUSCAINO:	YES
RODRIGUEZ:	YES
RAMAN:	YES

LC 09/09/21

-NOT OFFICIAL UNTIL COUNCIL ACTS-

**BOARD OF PUBLIC WORKS
MEMBERS**

GREG GOOD
PRESIDENT

AURA GARCIA
VICE PRESIDENT

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JESSICA M. CALOZA
COMMISSIONER

M. TERESA VILLEGAS
COMMISSIONER

DR. FERNANDO CAMPOS
EXECUTIVE OFFICER

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

**DEPARTMENT OF
PUBLIC WORKS**

**BUREAU OF
ENGINEERING**

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

September 2, 2021

The Honorable Nury Martinez
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

**CRISIS AND BRIDGE HOUSING FACILITIES - CD 9 TINY HOME VILLAGE HOMELES
SHELTER ON ASSERSON PARCEL NUMBER (APN) 5118-015-900 AND CD 6 TINY
HOME VILLAGE HOMELESS SHELTER AT 9700 SAN FERNANDO ROAD (C.F. 20-
0841) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF
EXEMPTION (NOEs)**

Dear President Martinez and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the construction of two bridge housing facilities, tiny home village homeless shelters, to provide crisis shelter services on Assessor Parcel Number (APN) 5118-015-900 in Council District 9 and at 9700 San Fernando Road in Council District 6.

RECOMMENDATION

Staff recommends that Council determine the Crisis and Bridge Housing projects on APN 5118-015-900 and at 9700 San Fernando Road, which allow for the lease, construction, and use of these properties as temporary shelters for those experiencing homelessness, are statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the projects use "Homeless Housing, Assistance and Prevention Program funds," they are exempt under Governor's Order No. N-32-20. Please refer to the attached NOEs.

Honorable Nury Martinez
September 2, 2021
Page 2 of 2

If you have any questions, please contact Maria Martin at Maria.Martin@lacity.org or (213) 485-5753.

Sincerely,



Digitally signed by Jose Fuentes
DN: C=US, E=jose.fuentes@lacity.org,
O=Public Works, OU=Engineering,
CN=Jose Fuentes
Date: 2021.09.02 11:02:58-07'00'

for

Gary Lee Moore, PE, ENV SP
City Engineer

Attachments

GLM/JF/mem

Q:\GLM\City Engineer\GLM Signed Documents\2021

Documents\TRANSMITTAL_CF20-0841_TinyHomeVillages_CD9_APN51180-15-
900_and_9700_SF_Rd_09-02-21

cc: Deborah Weintraub, Bureau of Engineering
Jose Fuentes, Bureau of Engineering
Marina Quinones, Bureau of Engineering
Maria Martin, Bureau of Engineering

ATTACHMENTS

1. Notice of Exemption (NOE) CD 9 Tiny Home Village Homeless Shelter - Compton Ave and Nevin Ave
2. Notice of Exemption (NOE) CD 6 Tiny Home Village Homeless Shelter - San Fernando Rd and Branford St

ATTACHMENT 1

Notice of Exemption (NOE)

CD 9 Tiny Home Village Homeless Shelter - Compton Ave and Nevin Ave

**CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III – City CEQA Guidelines)**

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 9
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PROJECT TITLE: CD 9 Tiny Home Village Homeless Shelter - Compton Ave and Nevin Ave	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: Assessor's Parcel No (APN) 5118015900, between Compton Avenue and Nevin Avenue, south of Adams Boulevard, in the Southeast Los Angeles Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1, Project Location. T.G. 674 F2 to 674 G2

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 9 Tiny Home Village Homeless Shelter - Compton Ave and Nevin Ave project (Project) consists of construction of a new homeless shelter on a Metro-owned parcel, a lease, and operation of the homeless shelter with sleeping cabins for approximately 148 individuals, including four Americans with Disabilities Act (ADA) compliant single beds, for people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2021, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
---	---

EXEMPT STATUS:	CITY CEQA GUIDELINES	STATE CEQA GUIDELINES	CA PUBLIC RESOURCE CODE
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27
<input checked="" type="checkbox"/> Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".			

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guideline, Section 15269(c); Public Resources Code, Section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the project uses Homeless Housing, Assistance and Prevention (HHAP) program funds, it is exempt under the Governor's Executive Order No. N-32-20 (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE:
RECEIPT NO.	REC'D BY	DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project will provide tiny homes which are small, detached, pre-fabricated cabins assembled on site, 72 with double beds (144 occupants) and four with ADA compliant single beds (four occupants), for approximately 148 individuals; six hygiene pallet units with restrooms, showers, and lavatories; an administration/laundry structure with a service sink, two administrative units, a pedestrian entry and guard station, a storage unit, 148 storage bins, mobile seating areas with umbrellas, a pet relief area, staff parking, eight-foot high perimeter fencing with privacy slats, a 20-foot through fire access lane with an entrance gate at Nevin Avenue and an exit gate at Compton Avenue, a fire hydrant, solid waste receptacles; and utility connections, including potable water, sanitary sewer, and electric service.

The Project operation will include approximately twenty employees working three shifts throughout the day with site security provided on a 24/7 basis or per a security plan consistent with the Los Angeles Homeless Services Authority's (LAHSA) standards. By creating a stable environment and providing access to basic needs, clients will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project site is located on a Metro-owned, approximately 48,601.7 square-foot irregularly shaped parcel, Assessor's Parcel No. (APN) 5118015900, between Compton Avenue and Nevin Avenue, south of Adams Boulevard. The Project site is a non-residential area, an industrial land use area that, under certain circumstances, allows for multifamily uses. The Project site is zoned M1-1 with Limited Industrial land use designation and is surrounded by parcels zoned M1-1 with Limited Industrial land uses (City of Los Angeles Department of City Planning, 2016 and 2021).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic

Douglas Zabilski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of

death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident

rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoombe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1		
2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

“We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19,” said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. “It is important that we act now to protect this population and the compassionate people who serve them.” (Corey Egel, 2020)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations “with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness.” (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor’s Executive Order No. N-25-20 noted the “need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19.” (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California’s shelter and housing inventory to slow the spread of the pandemic....

The Governor has stated that “[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19,” and “California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19.” (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted “in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials.” (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City’s Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering

individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to "specific actions necessary to prevent or mitigate an emergency." Public Resources Code section 21060.3 defines Emergency as, "a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services." Section 21060.3 further

provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City's already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt under the Governor's Executive Order No. N-32-20, Suspending CEQA

On March 18, 2020, Governor Newsom signed and issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020) suspending CEQA and the CEQA Guidelines' requirements “for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89, signed on March 17, 2020.” The Governor noted that “strict compliance with the various statutes and regulations specified in this order would prevent, hinder, or delay appropriate actions to prevent and mitigate the effects of the COVID-19 pandemic.” Because this project qualifies for and will use Homeless Emergency Aid Program funds for at least a portion of the work at the site,” it is exempt from CEQA under the Governor's suspension order.

C. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity

to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the Project’s programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor’s safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with

Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless

individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 148 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the family or individual's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing

- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate,

but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The site located on APN 5118015900, between Compton Avenue and Nevin Avenue, south of Adams Boulevard meets this requirement because it is developed a non-residential use that under certain circumstances allows multi-family uses. At least 75% of the perimeter of the site is surrounded by qualified urban uses. The Project site is zoned M1-1 with Light Industrial land use designation and is owned by Metro. Industrial land uses surround the Project site (Los Angeles Department of City Planning, 2016 and 2021).

The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses, industrial uses. Further, the site itself is considered a qualified urban use because it allows for multifamily uses.

The Project site is located within an urban area on a parcel that is currently developed with an industrial/institutional use (Metro right of way) and is surrounded by qualified urban uses. Therefore, the site meets the definition of infill site. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The Project is funded, at least in part, through State of California Homeless Housing, Assistance and Prevention Grant Program (HHAP) for the improvements. The City also has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement is met.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves construction of a new homeless shelter, lease, and operation of an emergency homeless shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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Attachment
Project Site Plan

ATTACHMENT 2

Notice of Exemption (NOE)

CD 6 Tiny Home Village Homeless Shelter - San Fernando Rd and Branford St

**CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III – City CEQA Guidelines)**

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 6
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PROJECT TITLE: CD 6 Tiny Home Village Homeless Shelter - San Fernando Rd and Branford St	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 9700 San Fernando Road public right-of-way, southeast of the San Fernando Road and Branford Street intersection, in the Sun Valley - La Tuna Canyon Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1, Project Location. T.G. 502 F5

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 6 Tiny Home Village Homeless Shelter - San Fernando Rd and Branford St project (Project) consists of construction of a new homeless shelter on public right-of-way, a lease, and operation of the homeless shelter with emergency sleeping cabins for approximately 161 individuals, including five Americans with Disabilities Act (ADA) compliant single beds, for people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2021, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27

☒ Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guideline, Section 15269(c); Public Resources Code, Section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the project uses Homeless Housing, Assistance and Prevention (HHAP) program funds, it is exempt under the Governor's Executive Order No. N-32-20 (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE:
RECEIPT NO.	REC'D BY	DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project will provide tiny homes which are small, detached, pre-fabricated emergency sleeping cabins assembled on site, 83 with double beds (156 occupants) and five with ADA compliant single beds (five occupants), for approximately 161 individuals; personal storage bins at each cabin, a guard station and storage lockers, four administration units and an administrative storage unit; seven hygiene pallet units with restrooms, showers, and lavatories; a laundry structure with an exterior service sink, mobile seating areas with umbrellas, a pet relief area, staff parking, eight-foot high perimeter fencing with privacy slats, asphalt paving painted with solar reflective coating, a 20-foot double entrance gate and a secondary emergency access gate, as new fire hydrant adjacent to a 20-foot minimum width fire access lane, a fire lane turnaround area, solid waste receptacles; and utility connections, including potable water, sanitary sewer, and electric service.

The Project operation will include approximately twenty employees working three shifts throughout the day with site security provided on a 24/7 basis or per a security plan consistent with the Los Angeles Homeless Services Authority's (LAHSA) standards. By creating a stable environment and providing access to basic needs, clients will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project site is located on approximately 49,200 square-foot rectangular area of undeveloped right-of-way of the northeast roadway of the San Fernando Road, southeast of the San Fernando Road and Branford Street intersection. The Project site is a non-residential site, public right of way, that allows for multifamily uses. The Project site is public-right-of way with Open Space land use designation and is surrounded by parcels zoned for various uses, M2-1-CUGU (industrial uses) and OS-IXL-CUGU (open space uses) to the north, PF-IXL-CUGU (public facilities, Metro right-of-way to the west and south, and OS-IXL-CUGU (open space uses) to the east (City of Los Angeles Department of City Planning, 2016 and 2021).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabilski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed

(Schwarcz, Sandra K, Ling C Hsu,, Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1		
2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the

COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

"We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19," said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. "It is important that we act now to protect this population and the compassionate people who serve them." (Corey Egel, 2020)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations "with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness." (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the "need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19." (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor has stated that "[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19," and "California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19." (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted "in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials." (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County

of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt under the Governor’s Executive Order No. N-32-20, Suspending CEQA

On March 18, 2020, Governor Newsom signed and issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020) suspending CEQA and the CEQA Guidelines’ requirements “for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89, signed on March 17, 2020.” The Governor noted that “strict compliance with the various statutes and regulations specified in this order would prevent, hinder, or delay appropriate actions to prevent and mitigate the effects of the COVID-19 pandemic.” Because this project qualifies for and will use Homeless Emergency Aid Program funds

for at least a portion of the work at the site,” it is exempt from CEQA under the Governor’s suspension order.

C. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the Project’s programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and

emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 161 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the family or individual's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program

- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management

Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The site located on a 49,200 square-foot rectangular area of undeveloped right-of-way of the northeast roadway of the San Fernando Road, southeast of the San Fernando Road and Branford Street intersection meets this requirement because it is located on a non-residential site that under certain circumstances allows multi-family uses. At least 75% of the perimeter of the site is surrounded by qualified urban uses, industrial and public facilities. The Project site is public-right-of way with Open Space land use designation and is surrounded by parcels zoned for various uses, M2-1-CUGU (industrial uses) and OS-IXL-CUGU (open space uses) to the north, PF-IXL-CUGU (public facilities, Metro right-of-way to the west and south, and OS-IXL-CUGU (open space uses) to the east (City of Los Angeles Department of City Planning, 2016 and 2021).

The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses, industrial and public facilities uses. Further, the site itself is considered a qualified urban use because it allows for multifamily uses.

The Project site is located within an urban area on a parcel that is currently undeveloped and identified in the Community Plan as open space use, public right-of-way and is surrounded by qualified urban uses. Therefore, the site meets the definition of infill site. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The Project is funded, at least in part, through State of California Homeless Housing, Assistance and Prevention Grant Program (HHAP) for the improvements. The City also has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement is met.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves construction of a new homeless shelter, lease, and operation of an emergency homeless shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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Attachment
Project Site Plan

RMM Decl.
Exhibit 67

RMM Decl.
Exhibit 67

HOLLY L. WOLCOTT
CITY CLERK

City of Los Angeles
CALIFORNIA

OFFICE OF THE
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER



ERIC GARCETTI
MAYOR

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213)978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.ORG

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 20-0841-S25

Council Meeting Date: August 19, 2022

Agenda Item No.: 16

Agenda Description: HOMELESSNESS AND POVERTY COMMITTEE REPORT relative to Lease Extensions for continued use of the Crisis and Bridge Housing Projects (Projects) located at 1533-35 North Schrader Boulevard and 1920 West 3rd Street (known as Caza Azul), and California Environmental Quality Act (CEQA) Exemption Determinations that, consistent with the Notices of Exemption already in the Council file (Council file Nos. 18-0352 and 18-0941) and supported by the City Council's prior actions and Resolutions approving constructing, leasing, and using the shelters; the Projects are Statutorily Exempt under Public Resources Code Section (PRC) 2110808(B)(4) as specific actions necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(C); and under PRC Section 21080.27 (Assembly Bill 1197) applicable to City of Los Angeles emergency homeless shelters; the 12th Report regarding COVID-19 Homelessness Roadmap funding recommendations; and related matters.

Council Action: HOMELESSNESS AND POVERTY COMMITTEE REPORT - ADOPTED

Council Vote:

YES	Blumenfield	YES	Bonin	YES	Buscaino
ABSENT	Cedillo	YES	de León	YES	Harris-Dawson
ABSENT	Koretz	YES	Krekorian	YES	Lee
YES	Martinez	YES	O'Farrell	YES	Price
ABSENT	Raman	ABSENT	Rodriguez		

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 4.133

FILE SENT TO MAYOR
LAST DAY FOR MAYOR TO ACT

08/23/2022
09/02/2022

APPROVED



8/23/2022

DATE SIGNED

Adopted Report(s) Title
Homelessness and Poverty Committee Report_8-11-22

HOMELESSNESS AND POVERTY COMMITTEE REPORT relative to LEASE EXTENSIONS FOR CONTINUED USE OF THE CRISIS AND BRIDGE HOUSING PROJECTS AT 1533-35 N. SCHRADER BOULEVARD AND 1920 W. 3RD STREET (KNOWN AS CAZA AZUL) AND CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) EXEMPTION DETERMINATIONS THAT, CONSISTENT WITH THE NOTICES OF EXEMPTION ALREADY IN THE COUNCIL FILE (CF NOS. 18-0352 AND 18-0941) AND SUPPORTED BY, THE CITY COUNCIL'S PRIOR ACTIONS AND RESOLUTIONS APPROVING CONSTRUCTING, LEASING, AND USING THE SHELTERS; THE PROJECTS ARE STATUTORILY EXEMPT UNDER PUBLIC RESOURCES CODE SECTION 21080(B)(4) AS SPECIFIC ACTIONS NECESSARY TO PREVENT OR MITIGATE AN EMERGENCY AS ALSO REFLECTED IN CEQA GUIDELINE SECTION 15269(C); AND UNDER PUBLIC RESOURCES CODE SECTION 21080.27 (AB 1197) APPLICABLE TO CITY OF LOS ANGELES EMERGENCY HOMELESS SHELTERS; and the 12th report regarding COVID-19 Homelessness Roadmap funding recommendations; and related matters.

Recommendation for Council action, SUBJECT TO THE APPROVAL OF THE MAYOR:

APPROVE the Recommendations contained in the City Administrative Officer (CAO) report dated August 5, 2022, attached to Council file No. 20-0841-S25.

Fiscal Impact Statement: The CAO reports that there is no impact to the General Fund as a result of the recommendations in this report at this time. The recommendations in this report will be funded with the City's General Fund approved for homelessness interventions AHS-GCP as well as: HHAP-2; ESG-CV; and the County service funding commitment from Fiscal Year 2021-22 and Fiscal Year 2022-23.

Financial Policies Statement: The CAO reports that the recommendations in this report comply with the City's Financial Policies in that budgeted funds are being used to fund recommended actions.

Community Impact Statement: None submitted

(Ad Hoc Committee on COVID-19 Recovery and Neighborhood Investment waived consideration of the above matter)

SUMMARY

At the meeting held on August 11, 2022, your Homelessness and Poverty Committee considered CAO and Bureau of Engineering reports relative to LEASE EXTENSIONS FOR CONTINUED USE OF THE CRISIS AND BRIDGE HOUSING PROJECTS AT 1533-35 N. SCHRADER BOULEVARD AND 1920 W. 3RD STREET (KNOWN AS CAZA AZUL) AND CEQA EXEMPTION DETERMINATIONS THAT, CONSISTENT WITH THE NOTICES OF EXEMPTION ALREADY IN THE COUNCIL FILE (CF NOS. 18-0352 AND 18-0941) AND SUPPORTED BY, THE CITY COUNCIL'S PRIOR ACTIONS AND RESOLUTIONS APPROVING CONSTRUCTING, LEASING, AND USING THE SHELTERS; THE PROJECTS ARE STATUTORILY EXEMPT UNDER PUBLIC RESOURCES CODE SECTION 21080(B)(4) AS SPECIFIC ACTIONS NECESSARY TO PREVENT OR MITIGATE AN EMERGENCY AS ALSO REFLECTED IN CEQA GUIDELINE SECTION 15269(C); AND UNDER PUBLIC RESOURCES CODE SECTION 21080.27 (AB 1197) APPLICABLE TO CITY OF LOS ANGELES EMERGENCY HOMELESS SHELTERS; and the 12th report regarding COVID-19 Homelessness Roadmap funding recommendations; and related matters.

After an opportunity for public comment was held, the Committee recommended to move forward the recommendations contained in the CAO report, as detailed above. This matter is now submitted to the Council for consideration.

Respectfully Submitted,



HOMELESSNESS AND POVERTY COMMITTEE

<u>MEMBER</u>	<u>VOTE</u>
DE LEÓN:	YES
RAMAN:	YES
BUSCAINO:	YES
RODRIGUEZ:	YES
BLUMENFIELD:	YES

LV 8/11/22

-NOT OFFICIAL UNTIL COUNCIL ACTS-

REPORT FROM

OFFICE OF THE CITY ADMINISTRATIVE OFFICER

Date: August 5, 2022

CAO File No. 0220-05151-0364

Council File No. 20-0841

20-0841-S21

20-0841-S23

Council District: All

To: The City Council

From: Matthew W. Szabo, City Administrative Officer

Reference: COVID-19 Homelessness Roadmap

Subject: **Twelfth Funding Report: COVID-19 Homelessness Roadmap Funding Recommendations**

SUMMARY

On September 9, 2020, the City Council approved funding for the initial projects under the COVID-19 Homelessness Roadmap (Roadmap) and directed this office to submit future funding recommendations through reports. This is the twelfth such report.

This report makes the following recommendations:

First, this report recommends operational funding for an interim housing site in Council District 1 with 130 beds, and eight additional beds at an existing interim housing site in Council District 8. This report also closes the funding gap for the operation of a new Safe Parking site in Council District 11 and for the construction of a Project Homekey site in Council District 6.

Second, this report recommends reprogramming funds that were previously allocated to Roadmap projects that are no longer moving forward.

Third, this report recommends reprogramming savings from various Roadmap projects. Additionally, this report includes technical amendments to prior Roadmap recommendations, and California Environmental Quality Act (CEQA) exemption determinations for several projects.

Lastly, this report recommends additional funding to support several existing programs and services, including funding for the City's three Coordinated Entry System (CES) Navigation Centers in Council Districts 2, 8, and 15.

RECOMMENDATIONS

1. DETERMINE that, consistent with the Notices of Exemption already in the Council Files (C.F.) Nos. 18-0352 and 18-0941, the Crisis and Bridge Housing projects located at 1533-35 N. Schrader Blvd. and 1920 W. 3rd St. (know as Caza Azul), which allow for the lease and continued use of the properties as temporary shelters for people experiencing homelessness, are statutorily exempt from CEQA under Public Resources Code Section 21080(b)(4), as specific actions necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); and Public Resources Code Section 21080.27 (AB 1197), applicable to City of Los Angeles (City) emergency homeless shelters, consistent with, and supported by, the City Council's prior actions and resolutions approving constructing, leasing, and using these shelters and determining their exemption from CEQA on December 11, 2018 (C.F. Nos. 18-0352 and 18-0941);
2. APPROVE \$1,733,875 from Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to Fund No. 63Q/43, account number to be determined, for 2022-23 Los Angeles Homeless Services Authority (LAHSA) Other Interim Housing Operations for start up and operating costs at an interim housing site located at 499 San Fernando Rd. in Council District 1;
 - a. REQUEST LAHSA to execute a new sole source contract, or amend its current contract, with the John Wesley Center for Health (JWCH) in the up to amount of \$1,733,875 for start up and operating costs to operate an interim housing site located at 499 San Fernando Rd. in Council District 1, from January 1, 2023 to June 30, 2023;
3. REPROGRAM up to \$4,777,422 in savings from various Roadmap interim housing projects for operations costs to the Emergency Solutions Grant - CARES Act (ESG-CV) Fund No. 517/43, Account No. 43VC9V, COVID-19 Homeless Roadmap from the following:
 - a. \$347,526 from ESG-CV Fund No. 517/43, Account No. 43TA30, Tiny Home Operations-11471 Chandler Blvd.;
 - b. \$1,338,966 from ESG-CV Fund No. 517/43, Account No. 43TA31, Tiny Home Operations-12600 Saticoy St.;
 - c. \$767,625 from ESG-CV Fund No. 517/43, Account No. 43TA32, Tiny Home Operations-6099 Laurel Canyon Blvd.;
 - d. \$822,917 from ESG-CV Fund No. 517/43, Account No. 43TA33, Tiny Home Operations-6700 Vanalden Ave.;
 - e. \$1,469,219 from ESG-CV Fund No. 517/43, Account No. 43TA34, Tiny Home Operations-6073 Reseda Blvd.; and
 - f. \$31,169 from ESG-CV Fund No. 517/43, Account No. 43TA35, Tiny Home Operations-5941 Hollywood Blvd.;
4. APPROVE up to \$25,190,428 from Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement for

- operating costs to continue Roadmap interventions from July 1, 2022 through June 30, 2023 to the following accounts for the projects listed in Page 13 :
- a. \$1,661,159 to Fund No. 63Q/43, account number to be determined for 2022-23 LAHSA A Bridge Home Operations;
 - b. \$23,529,269 to Fund No. 63Q/43, account number to be determined for 2022-23 LAHSA Project Homekey Operations; and
5. APPROVE up to \$983,675 from Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement for operations of an interim housing site with 49 beds at 7816 Simpson Avenue in Council District 6 through June 30, 2023:
- a. TRANSFER \$983,675 to Fund No. 63Q/43, account number to be determined for 2022-23 LAHSA Other Interim Housing Operations;
 - b. INSTRUCT LAHSA execute a new or amend an existing sole source subcontract with LA Family Housing for the interim housing site operations in Council District 6 and add up to \$983,675 to provide services;
6. APPROVE up to \$126 for leasing costs for various interim housing sites from the Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement, to the following accounts:
- a. TRANSFER \$126 to Fund No. 63Q/10, Account No. 10V714, Leasing - 828 Eubank Ave. for the A Bridge Home site at 828 Eubank Ave. in Council District 15 for the annual rent (\$1) and the administrative fee (\$125) owed to the Port of Los Angeles through June 30, 2023;
7. APPROVE \$126 from Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to Fund No. 63Q/10, Account No. 10V714, Leasing - 828 Eubank Ave. to reimburse leasing costs for the A Bridge Home site at 828 Eubank Ave. in Council District 15 for the annual rent (\$1) and administrative fee (\$125) owed to the Port of Los Angeles for Fiscal Year 2020-21;
- a. TRANSFER \$126 from Fund No. 63Q/10, Account No. 10V714, Leasing - 828 Eubank Ave. to Fund No. 100/63, account to be determined to reimburse leasing costs for the A Bridge Home site at 828 Eubank Ave. in Council District 15 for the annual rent (\$1) and administrative fee (\$125) owed to the Port of Los Angeles for Fiscal Year 2020-21;
8. APPROVE up to \$154,248 from AHS-GCP Fund No. 100/56, 000931 to Citywide Leasing Fund No. 100/63, Account No. 000027, A Bridge Home Leasing for leasing costs of A Bridge Home site at 1920 W. 3rd St. in Council District 1 through June 30, 2023;

9. REPROGRAM \$3,175,000 from Homeless Efforts - County Funding Agreement Fund No. 63Q/43, account number to be determined for 2022-23 LAHSA A Bridge Home Operations to Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement for operating costs from the following A Bridge Home sites:
 - a. \$613,200 from the A Bridge Home site located at 1920 W. 3rd Street in Council District 1;
 - b. \$1,576,800 from the A Bridge Home site located at 1533 Schrader Boulevard in Council District 13;
 - c. \$985,500 from the A Bridge Home site located at 711 N. Alameda Street in Council District 14;
10. APPROVE \$3,175,000 from AHS-GCP Fund No. 100/56, 000931 to the Los Angeles Housing Department Fund No. 10A/43, in a new account entitled, "2022-23 LAHSA A Bridge Home Operations" for operating costs of the following A Bridge Home sites through June 30, 2023;
 - a. \$613,200 for the A Bridge Home site located at 1920 W. 3rd Street in Council District 1;
 - b. \$1,576,800 for the A Bridge Home site located at 1533 Schrader Boulevard in Council District 13;
 - c. \$985,500 for the A Bridge Home site located at 711 N. Alameda Street in Council District 14;
11. TRANSFER up to \$306,000 for the previously approved leasing costs relative to the Sixth Roadmap report (C.F. 20-0841) dated May 20, 2021, for the Tiny Home Village site located at 2301 W. 3rd St. in Council District 13 from July 1, 2022 through June 30, 2025 as needed from Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to the Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10V696, Leasing - 2301 West 3rd St CD 13;
12. TRANSFER up to \$241,499 for the previously approved leasing costs relative to the Fifth Roadmap Report (C.F. 20-0841) dated March 18, 2021, and substitute motion (Ridley-Thomas-Martinez, C.F. 20-0841) dated April 6, 2021, for the Tiny Home Village site located at 1455 Alvarado St. in Council District 13 from July 1, 2022 through April 30, 2024 as needed from Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to the Homelessness Efforts - County Funding Agreement Fund No. 63Q/10, in a new account entitled, "Leasing - 1455 Alvarado St.";
13. INSTRUCT LAHSA to amend their current contract with Homeless Outreach Program Integrated Care System (HOPICS) to provide services for eight additional beds at the existing interim housing site located at 9165 & 9165 ½ S. Normandie St. in Council District 8, for a new total of 28 beds;

14. APPROVE \$132,880 from Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to Fund No. 63Q/43, account number to be determined, entitled "2022-23 LAHSA Other Interim Housing Operations" for the operating costs of eight additional beds at the interim housing site located at 9165 & 9165 ½ South Normandie Street in Council District 8 from September 1, 2022 to June 30, 2023;
15. APPROVE \$20,528.57 from the Additional Homeless Services - General City Purposes (AHS-GCP) Fund No. 100/56, Account No. 000931 for repairs and tree maintenance for the A Bridge Home site at 1533 Schrader Blvd. in Council District 13 to the following accounts:
- a. \$12,653.57 to Fund No. 100/40, Account No. 003040, Contractual;
 - b. \$7,875 to Fund No. 363/94, Account No. 94V030, Maintenance, Repair, & Utility Service for Off-Street Lots ;
16. REPROGRAM up to \$2,980,444 in previously approved operating and leasing costs allocated to 7253 Melrose Ave. in Council District 5, as follows:
- a. \$1,095,600.00 from the Homeless Efforts - County Funding Agreement Fund No. 63Q/43, Account No. 43TA70, Interim Housing Operations - 7253 Melrose Ave. to Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement;
 - b. \$1,874,844.00 from GSD Fund No. 100/40, Account No. 006030, Leasing to Homeless Efforts - County Funding Agreement, Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement; and
 - c. \$10,000.00 of Homeless Housing, Assistance, and Prevention (HHAP) funds from GSD Fund No. 100/40, Account No. 006030, Leasing to HHAP, Fund No. 62Y/10, Account No. 10S650, FC-1- A Bridge Home Capital;
17. REPROGRAM up to \$475,200 in operating costs allocated to a previously approved Tiny Home Village located between Compton Ave. and Nevin Ave. in Council District 9, from Fund No. 63Q/43, Account 43TB37, Interim Housing Operations (Pallet) to Homeless Efforts - County Funding Agreement, Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement;
18. REPROGRAM up to \$7,131,112.43 from Capital Technology Improvement Expenditure Program (CTIEP) Fund No. 100/54, Account No. 00V836, Council District 9 Compton & Nevin Pallet Shelters as follows:
- a. AUTHORIZE the transfer of \$1,173,382.47 to CTIEP Fund No. 100/54, new account entitled "CD 14 850 N. Mission Rd. THV," of which \$586,691.26 has been expended and \$586,691.21 has been encumbered under a Purchase Order for pallet shelters that were meant for the discontinued project at Compton Ave. and Nevin Ave. in

- Council District 9 and that will now be used for the THV at 850 N. Mission Ave. in Council District 14;
- b. TRANSFER up to \$1,626,715 to CTIEP Fund No. 100/54, Account No. 00V846, Council District 1 499 San Fernando Rd. for additional construction costs of an interim housing site with up to 132 beds at 499 San Fernando Rd. in Council District 1; and
 - c. TRANSFER up to \$4,331,014.96 to AHS-GCP Fund No. 100/56, Account No. 000931;
19. REPROGRAM \$10,000 of uncommitted HHAP funds from HHAP Fund 62Y/10, Account No. 10V693, Council District 9 Compton Ave. and Nevin Ave. Pallet Shelters to HHAP Fund 62Y/10, Account No. 10S650, FC-1: A Bridge Home Capital and Operating Gap for future homelessness projects.
20. REQUEST LAHSA to amend its existing contracts or subcontracts with service providers to remove the discontinued interim housing projects at 7253 Melrose Ave. in Council District 5 and Compton Ave. and Nevin Ave. in Council District 9;
21. AMEND and REPLACE the approved Recommendation 7 relative to the 11th Homelessness Roadmap Report dated May 20, 2022 (C.F. 20-0841-S23) to read as follows:
- a. APPROVE \$2,968,125 from Homeless Efforts - County Funding Agreement Fund No. 63Q/10, Account No. 10T618, Homeless Effort - County Funding Agreement to the following accounts for the operating and leasing costs of the interim housing site with 75 beds located at 1904 Bailey St. in Council District 14, through June 30, 2023:
 - i. \$1,753,125 to Fund No. 63Q/43, in a new account entitled, "2022-23 LAHSA Other Interim Housing Operations" for operations and start up costs; and
 - ii. \$1,215,000 to Fund No. 63Q/43, in a new account entitled, "2022-23 LAHSA Leasing";
22. REQUEST LAHSA to amend their contract with Safe Parking LA to combine two Safe Parking sites as follows:
- a. Discontinue the Safe Parking site at Cahuenga Branch Library in Council District 13 with ten safe parking stalls;
 - b. Add ten stalls to the Safe Parking site located at 1033 Cole Ave. in Council District 13, bringing the new total safe parking stalls at this location to 20; and
 - c. Extend the Safe Parking site at 1033 Cole Ave. in Council District 13 to June 30, 2023;
 - d. Reflect a \$109,500 increase in the allocation for the Safe Parking site at 1033 Cole Ave. in Council District 13, and reflect a corresponding decrease in the allocation for the Safe Parking site at Cahuenga Branch Library in Council District 13.

23. RESCIND the approved Recommendation Nos. 26, 28, and 30 from the 11th Homelessness Roadmap Report dated May 20, 2022 (C.F. 20-0841-S23);
24. AMEND the approved Recommendation No. 27 relative to the 11th Homelessness Roadmap Report dated May 20, 2022 (C.F. 20-0841-S23) and replace it with the following:
- a. REPROGRAM up to \$3,260,225 in ESG-CV savings to ESG-CV Fund No. 517/43, Account No. 43VC9V, COVID-19 Homeless Roadmap from the following accounts:
 - i. \$726,000 from ESG-CV Fund No. 517/43, Account No. 43TA36 - Tiny Home Operations - 1221 Figueroa Pl.;
 - ii. \$1,009,975 from ESG-CV Fund No. 517/43, Account No. 43VB37, San Fernando Rd. and Branford St.;
 - iii. \$1,524,250 from ESG-CV Fund No. 517/43, Account No. 43VC8V, 2300 Central Ave. Safe Sleep;
25. RECOGNIZE AND TRANSFER \$1,265,000 in Homekey 1 operations savings from ESG-CV Fund No. 517/43, Account No. 43TA42, Homekey Operations to ESG-CV to ESG-CV Fund No. 517/43, Account No. 43VC9V, COVID-19 Homeless Roadmap from the following Homekey 1 sites:
- a. Pano (Panorama) = \$250,000
 - b. Travelodge/Normandie = \$500,000
 - c. Arleta (Woodman) = \$315,000
 - d. Sieroty (Howard Johnson) = \$200,000
26. APPROVE up to \$3,500,000 of ESG-CV funds from Fund No. 517/43, Account No. 43VC9V, COVID-19 Homeless Roadmap to ESG-CV Fund No. 517/43, Account No. 43TA43, Homekey Rehab for increased costs, subject to review and final approval by the City's Project Homekey 1 consultant, Brilliant Corners for the Project Homekey site, Arleta (formerly known as Woodman) in Council District 6 for increased construction costs, including asbestos remediation, and prevailing wage;
27. APPROVE up to \$4,286,703 of ESG-CV funds from Fund No. 517/43, Account No. 43VC9V, COVID-19 Homeless Roadmap to ESG-CV Fund No. 517/43, Account No. 43TA43, Homekey Rehab for rehabilitation for fire life-safety and accessibility features for the Project Homekey site, Pano (formerly known as the Panorama) in Council District 6 for FY 2022-23, July 1, 2022 - June 30, 2023;
28. APPROVE up to \$1,515,944 from ESG-CV Fund No. 517/43, Account No. 43VC9V, COVID-19 Homeless Roadmap to ESG-CV Fund No. 517/43 Account No. 43TA43, Homekey Rehab for LA Family Housing for the rehabilitation of life-safety and accessibility features for Project Homekey 1, the Sieroty (Howard Johnson), an interim housing site, located at 7432 Reseda Boulevard, Reseda, CA 91335 in Council District 4 for FY 2022-23;

29. AUTHORIZE the extension of the LAHSA's expenditure authority for previously approved Project Homekey rehabilitation projects for construction costs incurred through the Certificate of Occupancy date;
30. APPROVE up to \$1,799,483.95 from AHS-GCP Fund No. 100/56, Account No. 000931 to the Bureau of Engineering (BOE) Special Services Fund No. 682/50, Account No. 50VVIA, Salaries and Mileage for Homeless Roadmap to reimburse general salaries, transportation costs, and contractual services associated with the construction costs of previously approved interim housing sites and feasibility studies:
- a. TRANSFER \$1,799,483.95 from the BOE Special Services Fund No. 682/50, Account No. 50VVIA, Salaries and Mileage for Homeless Roadmap to the following departments as needed to reimburse general salaries, transportation costs, and contractual services associated with the construction costs of previously approved interim housing sites and feasibility studies:
 - i. BOE Salaries General in the amount of \$1,500,294.24;
 - ii. BOE Transportation Costs in the amount of \$237.75; and
 - iii. BOE Contractual Services in the amount of \$298,951.96;
 - b. Authorize the Controller to appropriate a total of \$1,799,483.95 from BOE Special Services Fund No. 682/50, Account No. 50VVIA Salaries and Mileage as needed to reimburse Homeless Roadmap costs, to the following BOE accounts for Roadmap technical support services:
 - i. \$1,500,294.24 to BOE Fund No. 100/78, Account 1010, Salaries General;
 - ii. \$237.75 to BOE Fund No. 100/78, Account 3310, Transportation; and
 - iii. \$298,951.96 to BOE Fund No. 100/78, Account 3040, Contractual Services;
31. APPROVE \$225 from AHS-GCP Fund No. 100/56, Account No. 000931 to BOE Special Services Fund No. 682/50, in a new account entitled, "CEQA Renewals for Homeless Roadmap" to reimburse fees accrued for CEQA reports and renewals;
32. TRANSFER \$2,411,159.96 from Fund No. 100/56, Account No. 000931, AHS-GCP to Fund No. 100/56, Account No. 000957, Project Roomkey (PRK) COVID-19 Emergency Response to provide funding for the previously approved PRK extension in the 11th Covid-19 Homelessness Roadmap Report dated May 20, 2022 (C.F. 20-0841-S23);
33. AMEND Recommendation 4.c. of the approved motion (Raman-de Leon-Martinez; C.F. 22-0756) dated June 29, 2022 relative to the extension of PRK at the Highland Gardens to add the following:
- a. TRANSFER up to \$595,317.00 to Fund No. 10A/43 Account No. 43TA68, PRK-LAHSA-FEMA;
34. AMEND the approved motion (Raman-de Leon-Martinez; C.F. 22-0756) dated June 29, 2022 relative to the extension of PRK at the Highland Gardens to add the following:
- a. INSTRUCT the General Manager, Los Angeles Housing Department, or their designee, to amend the City's Roadmap contract with LAHSA, C-137223, to add up

- to \$595,317.00 for services at the Highland Gardens PRK site for the period of July 1, 2022 through December 30, 2022; and
- b. REQUEST that LAHSA amend the sole source agreement with Turning Point to add up to \$595,317.00 for services at the Highland Gardens PRK site for the period of July 1, 2022 through December 30, 2022;
35. APPROVE an additional \$497,031 for costs associated with operating CES Navigation Centers in Council Districts 2, 8, and 15;
- a. TRANSFER \$497,031 from AHS-GCP Fund No. 100/56, Account No. 000931 to Fund No. 10A/43, Account No. 43QC13, Street Strategies for additional funding for the CES Navigation Centers in Council Districts 2, 8, and 15;
36. APPROVE \$646,263 from the AHS-GCP, Fund No. 100/56, Account No. 000931 for various storage programs as follows:
- a. Approve \$297,612 to Fund No. 10A/43, in a new account entitled, "LAPD Involuntary Storage," for the Involuntary Storage Program operated by the Los Angeles Police Department;
- b. Approve \$348,651 to Fund No. 10A/43, in a new account entitled, "Storage - Unattended Property," for lease and operating costs at the Stanford storage facility;
37. AMEND the approved recommendation 5 relative the Homeless Emergency Aid Program Close-Out Report (C.F. 18-0628) dated April 25, 2022, and replace with the following:
- a. APPROVE payment in the amount of \$916.52 to the Department of Building and Safety for outstanding invoices for the following sites from Activity Category 1:
- i. \$179.68 for the A Bridge Home site located at 100 Sunset Ave., in Council District 11.
- ii. \$368.42 for the A Bridge Home site located at 3210 Riverside Dr., in Council District 4.
- iii. \$368.42 for the A Bridge Home site located at 407 N. Beacon St., in Council District 15.
38. APPROVE payment in the amount of \$1,414.70 from AHS-GCP, Fund No. 100/56, Account No. 000931 to the Department of Building and Safety for outstanding invoices relating to the A Bridge Home sites located at Sunset, Riverside, and Beacon, in Council Districts 4, 11, and 15, respectively;
39. APPROVE \$500,000 for the Community Intervention Workers (CIWs) to perform homeless outreach services within Council District 8:
- a. TRANSFER \$500,000 AHS-GCP Fund No. 100/56, Account No. 000931 to General Fund Fund No. 100/56, Account No. 000417, Assist Homeless Multidisciplinary Outreach Teams - CD 8 ; and
- b. INSTRUCT the City Clerk to amend the contract with Community Build Inc (C-138867) to increase funding by \$500,000 for CIWs to perform homeless outreach services within Council District 8;

40. APPROVE \$500,000 additional funding for the Safe Passage program and homeless outreach services for people experiencing homelessness in Council District 8:
- TRANSFER \$500,000 AHS-GCP Fund No. 100/56, Account No. 000931 to General Fund Fund No. 100/56, Account No. 000408, Safe Passages in South Los Angeles - CDs 8 and 9; and
 - INSTRUCT the City Clerk to amend the contract with Community Build Inc. (C-137089) to increase funding by \$500,000 for the Safe Passage program and Homeless Outreach Teams to provide services for people experiencing homelessness in Council District 8;
41. APPROVE \$500,000 for the North Valley Caring Services to perform homeless outreach and other services within Council District 6:
- TRANSFER \$500,000 AHS-GCP Fund No. 100/56, Account No. 000931 to General Fund Fund No. 100/56, Account No. 000411, Homeless Families Services - CD 6; and
 - INSTRUCT the City Clerk to amend the contract with North Valley Caring Services (C-139303) to increase funding by \$500,000 for to perform homeless outreach and other services;
42. APPROVE up to \$136,328 to augment the existing contract (C-132815) between the Los Angeles County Department of Health Services and the Office of the City Administrative Officer (CAO) for real estate services, for services through June 30, 2023;
- TRANSFER up to \$136,328 from AHS-GCP, Fund No. 100/56, Account No. 000931, to Fund No. 100/56, in a new account entitled, "Roadmap Real Estate Consulting Services";
43. AUTHORIZE the CAO to transfer up to \$272,656 from Fund No. 100/56, to the newly created "Roadmap Real Estate Consulting Services" account to Fund 100/10 Account 003040, Contractual Services. Up to \$136,328 were approved in Recommendation 23 relative to the 11th Homelessness Roadmap Report, dated May 20, 2022 (C.F. 20-0841-S23), and up to \$136,328 as recommended from this report;
44. AUTHORIZE the CAO to amend its contract with the Los Angeles County Department of Health Services (C-132815) for real estate evaluation and architectural services to exercise one of the one-year extension options thereby extending the contract through December 31, 2023, and augment the contract ceiling amount by an additional up to amount of \$136,328 for services through June 30, 2023;
45. INSTRUCT the General Manager of LAHD, or their designee, to amend the City's Roadmap contract with LAHSA, C-137223, as follows:
- Reflect the start up and operations funding for the interim housing site located at 499 San Fernando Rd. in Council District 1 as described above in this report;
 - Reflect the removal and changes to the Safe Parking sites in Council District 13 as

described in this report;

- c. Remove 7253 Melrose Ave., in Council District 5 and the Tiny Home Village located between Compton Ave. and Nevin Ave. in Council District 9 and their operation amounts, as described in this report;
- d. Add funding for eight beds to the interim housing site located at 9165 & 9165 ½ S Normandie Street in Council District 8

46. AUTHORIZE the CAO to:

- a. Prepare Controller instructions or make necessary technical adjustments, including to the names of the Special Fund accounts recommended for this report, to implement the intent of these transactions, and authorize the Controller to implement these instructions; and
- b. Prepare any additional Controller instructions to reimburse City departments for their accrued labor, material or permit costs related to projects in this report, to implement the intent of these transactions, and authorize the Controller to implement these instructions.

BACKGROUND

As a part of the Roadmap, the City reached an agreement with the County of Los Angeles (County) on June 16, 2020, to develop 6,700 homeless within 18 months, to address the COVID-19 emergency. This agreement established the following milestones:

- 700 beds in existing agreements with the County within 10 months;
- 5,300 new beds within 10 months; and
- 700 new beds within 18 months.

6,000 of these beds must be new beds, which are not included in any existing agreements between the City and the County. The County has committed to providing the City up to \$60 million in services funding per year over the five-year term of the agreement, for a total of up to \$300 million, based on the number of interventions that are open and occupiable within 60 days of July 1st each year. The target population for this effort includes:

- People experiencing homelessness and living in the City within 500 feet of freeway overpasses, underpasses, and ramps;
- People experiencing homelessness within the City who are 65 years of age or older; and
- Other vulnerable people experiencing homelessness within the City.

As of June 30, 2022, 7,387 new interventions are open and occupiable, including 2,236 rapid rehousing/shared housing placements overseen by LAHSA.

DISCUSSION

Bureau of Engineering CEQA Analyses

At the beginning of the City's A Bridge Home program in 2018, the City and County of Los Angeles came to an agreement that the County would pay for services and operations for the bridge housing program's first 600 beds, for three years. Two of the program's early sites, Casa Azul, located at 1920 W. 3rd St. in Council District 1 with 41 beds, and the Schrader Sprung Structure, located at 1533 Schrader Blvd. in Council District 13, with 72 beds, were included in this initial grouping of County-funded beds. The three-year terms for both sites expired at the end of Fiscal Year 2022-23 and as such, the City needed to identify a new funding source for services for these sites. Currently, Casa Azul is being operated by People Assisting the Homeless (PATH), and will serve women only (previously the site served women and women with minor children). The Schrader facility, although it was also initially operated by PATH for the first three years, going forward will be operated by the Weingart Center. This report recommends funding in the amounts of \$154,248 for Casa Azul leasing costs through June 30, 2023, and a total of \$20,528.57 for repairs and general maintenance, including tree trimming services, at the Schrader site.

BOE has conducted a CEQA analysis for this site, which is transmitted under separate cover. The Mayor and City Council must approve BOE's determinations that this use is categorically exempt from CEQA. This report recommends a total of \$225 in CEQA renewal fees, which cover this and several other projects (\$75 per filing), and creates a fund for these fees, as well.

Lastly, this report recommends an additional amount up to \$1,799,483.95 in AHS-GCP funding for BOE salaries and transportation costs associated with the construction of previously approved interim housing sites and feasibility studies.

Reprogramming of Savings in ESG-CV Funds

This report recommends reprogramming up to \$8,037,647 in savings from ESG-CV interim housing operating funds due to delays in service start dates for various Roadmap projects. The \$8,037,647 in reprogrammed ESG-CV funds are recommended for rehabilitation funding for Project Homekey sites.

Supplemental Ongoing/Service Costs of Roadmap Interventions through June 30, 2023

The operating/service funding for various Roadmap interventions are needed for FY 2022-23. Following the release of the 11th Homelessness Roadmap, additional need for funding for various interventions were identified. Recommendation 4 in this report provides funding for two A Bridge Home sites and Roadmap Project Homekey sites. As such, this report recommends a full year's funding for previously approved Roadmap interventions. Table 1 below provides a detailed list of the various sites using the County MOU commitment funds as noted in Recommendation 4.

Funding Category	Site	County Funds
A Bridge Home Operations	13160 Raymer St.	\$946,999
	310 N. Main St. (Civic Center)	\$714,160
	Sub-total	\$1,661,159
Project Homekey Operations	Beacon (Solaire)	\$2,823,275.00
	Sieroty (Howard Johnson)	\$581,719
	Sepulveda Villa (Econo Motor)	\$1,885,225
	Arleta (Woodman)	\$4,591,700.25
	Encinitas (Good Nite Inn)	\$2,750,275
	Restoration Apartments (EC Motel & EC Motel Parking)	\$930,750.00
	Mollie Maison (Best Inn)	\$682,550.00
	The Layover (Super 8 LAX)	\$1,414,375
	PV Marina Del Rey (Ramada Inn)	\$1,056,675
	Devonshire Lodge (Travelodge)	\$2,381,625
	The Nest	\$1,315,825
	Casa Luna (Titta's Inn)	\$1,458,175.00
	Huntington Villas (Super 8 Alhambra)	\$1,657,100
	Sub-total	\$23,529,269.00
Total		\$25,190,428

Council District 1, Tiny Home Village at 499 San Fernando Rd.

The Northeast New Beginnings Community located at 499 San Fernando Rd. in Council District 1 is a Tiny Home Village that will provide 132 beds for people experiencing homelessness. In the CAO report dated November 22, 2021, \$11,603,635 of AHS-GCP funds and \$2,812,279 of COVID-19 Community Development Block Grant (CDBG) funds were approved for construction of this site. An additional \$460,000 from the AHS-GCP is being provided to make 32 units code compliant for adaptability.

This report recommends \$1,733,875 in County funds to cover JWCH's start-up and operating costs from January 1, 2023 to June 30, 2023.

Council District 8, 9165 & 9165 ½ S. Normandie Ave.

The interim housing site, located at 9165 & 9165 ½ S. Normandie Ave. in Council District 8, currently provides 20 beds that are included in the Roadmap. This site was initially located at 263 & 263 ½ W 42nd St. in Council District 9, and opened on April 1, 2021. The service provider, Homeless Outreach Program Integrated Care System (HOPICS), relocated to the current location due to leasing issues. The new location in Council District 8 can accommodate an additional eight beds; LAHSA has confirmed that HOPICS can serve these new beds. This report recommends \$154,248 of County funds to support the eight beds from September 1, 2022 to June 30, 2023.

Reprogramming of Funds from Sites No Longer in Consideration

This report recommends reprogramming funds that were allocated to two sites that are no longer being considered for Interim Housing under the Roadmap. The first site is in Council District 5 located at 7253 Melrose Avenue. In the CAO report dated March 18, 2021 (C.F. 20-0841), this site received \$2,970,444 of County funds and \$10,000 of Homeless Housing, Assistance, and Prevention (HHAP) grant funds for leasing and operation costs.

The second site was to be a Tiny Home Village in Council District 9 located between Compton Avenue and Nevin Avenue, which would have provided 144 beds. A total of \$475,200 of County funds were approved in the CAO report dated March 3, 2022 (C.F. 20-0841-S21) for operations. For construction of this site, \$7,194,335 of the AHS-GCP funds were approved in the CAO report dated September 1, 2021 (C.F. 20-0841), as well as \$10,000 of HHAP funds. This site was removed from consideration on June 9, 2022. This report recommends reprogramming the \$475,255 that was allocated for operations and \$7,131,112.43 from AHS-GCP and \$10,000 from HHAP, that was allocated for construction.

Council District 13, Safe Parking

Council District 13 houses two Safe Parking sites that provide ten beds each to the Roadmap. The first site, located at 1033 Cole Ave., is owned by the Los Angeles Department of Water and Power. The second site, the Cahuenga Branch Library located at 4591 Santa Monica Blvd., is owned by the Los Angeles Public Library. The Cole Ave. site has been extended, with a new

closing date of June 30, 2023. Further, this site will be expanded to accommodate the loss of the ten stalls at the Cahuenga Branch Library site, for a new total of 20 beds. The \$109,500 funding amount allocated for Cahuenga Library will now be allocated for the Cole Ave. site, bringing the total funding allotment for that site to \$328,500. The consolidation of these sites will streamline services and make operations more sustainable for the service provider, Safe Parking LA.

Project Homekey 1 Rehabilitation Allocations

This report allocates up to \$5,802,647 for Project Homekey 1 interim housing sites for life/safety and accessibility rehabilitation for the remaining work on two Project Homekey 1 sites for FY 2022-23. This funding is composed of savings identified in operating costs among various Roadmap interim housing sites.

Project Homekey 1 - Arleta (Woodman)

The initial budget for the Arleta site (formerly known as Woodman), located at 9120 Woodman Ave., was based on initial design plans that were not fully detailed in scope. In addition, delays in funding awards for the project prevented the owner/operator from locking in rates, resulting in increased construction costs. Asbestos was also discovered across the entire building. Further, the owner/operator applied the incorrect prevailing wage rates to the project. The residential rates had been used in the original construction estimates. However, since this site will remain interim housing and will not convert into permanent supportive housing, commercial prevailing wage must be applied. This report recommends providing up to \$3,500,000 million in ESG-CV funds for this purpose, pending final review and approval by the Homekey 1 consultant, Brilliant Corners.

Council District 8, Outreach

On May 17, 2022, the City Council adopted the Report from the Budget and Finance Committee (C.F. 22-0600) that recommended allocating \$500,000 in additional funding from the AHS-GCP for CIW to perform homeless outreach services within Council District 8. Twelve local community members were hired and trained as CIWs, and were supervised by the Contractor, Community Build, Inc. Each CIW works 20 hours per week, based on need. The CIWs provide outreach support to the Council District's existing outreach provider, HOPICS, and their multidisciplinary team (MDT). The CIWs have also been trained by SSG/HOPICS to engage hard-to-serve individuals living in homeless encampments using trauma-informed and evidence-based practices. CIWs also focus on improving community sanitation in and around encampments by encouraging encampment residents to keep living spaces clean, cooperate with community clean-ups, and be responsive to complaints.

On May 18, 2022, a Motion (Harris Dawson-Bonin, C.F. 22-0600) was introduced to fund the Safe Passage program in Council District 8. The motion moved to add \$500,000 for the Safe Passage program and homeless outreach in the district. The program is supported by the South Los Angeles Community Safety Initiative (Project SAVE) and is managed by Community Build, Inc.

Council District 6, North Valley Caring Services

On May 17, 2022, the City Council adopted the Report from Budget and Finance Committee (C.F. 22-0600) that recommended allocating \$500,000 in additional funding from the AHS-GCP to North Valley Caring Services (NVCS) to perform homeless outreach services within Council District 6. NVCS's homeless outreach team's goal is to establish direct contact with unhoused individuals and build supportive relationships to provide pathways to temporary and permanent housing.

Real Estate Consulting Services

This report recommends adding funding and executing one of the one-year extension options to the Letter of Agreement with the Los Angeles County Department of Health Services related to identifying, evaluating, and procuring suitable, privately owned sites for interim housing. The services include site design, land-use and permitting evaluation, rehabilitation planning and cost estimates, and Project Homekey construction monitoring.

An additional \$136,328 is needed for this contract to support ongoing costs associated with Roadmap site assessment and Project Homekey construction monitoring.

FISCAL IMPACT STATEMENT

There is no impact to the General Fund as a result of the recommendations in this report at this time. The recommendations in this Report will be funded with the City's General Fund approved for homelessness interventions AHS-GCP as well as: HHAP-2; ESG-CV; and the County service funding commitment from FY 2021-22 and FY 2022-23.

FINANCIAL POLICIES STATEMENT

The recommendations in this report comply with the City Financial Policies in that budgeted funds are being used to fund recommended actions.

Attachments:

1. COVID-19 Homelessness Roadmap Status of Capital and Operating Funding if 12th Homeless Roadmap Funding Recommendations are Approved

MWS:PJH:YC:BB:JL:MZ:MP:MAG:EPG:MCF:SBL:16230007

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**DEPARTMENT OF
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GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

August 5, 2022

The Honorable Nury Martinez
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

**CRISIS AND BRIDGE HOUSING FACILITIES - CD 13 1533 N SCHRADER
BOULEVARD AND CD 1 1920 W 3RD STREET HOMELESS SHELTERS (C.F. 20-0841-
S25) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF
EXEMPTION (NOEs)**

Dear President Martinez and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the lease renewal or extension and funding to provide continued crisis shelter services at 1533 N. Schrader Boulevard in Council District 13, and 1920 W. 3rd Street in Council District 1.

RECOMMENDATION

Staff recommends that Council determine the Crisis and Bridge Housing projects at 1533 N. Schrader Boulevard and 1920 W. 3rd Street, which allow for the lease and use of these properties as temporary shelters for those experiencing homelessness, are statutorily exempt under Public Resources Code Section 21080(b)(4), as specific actions necessary to prevent or mitigate an emergency as also reflected in CEQA Guidelines Section 15269(c); Public Resources Code Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters. Please refer to the attached NOEs.

Honorable Nury Martinez
August 5, 2022
Page 2 of 2

If you have any questions, please contact Maria Martin at Maria.Martin@lacity.org or (213) 485-5753.

Sincerely,



for
Gary Lee Moore, PE, ENV SP
City Engineer

Attachments

GLM/JF/mem; eg

<https://englacity.box.com/s/gzs7au4qo1sp0ajtvq430ly78xzvrfgt>

cc: Deborah Weintraub, Bureau of Engineering
Jose Fuentes, Bureau of Engineering
Marina Quinones, Bureau of Engineering
Maria Martin, Bureau of Engineering

ATTACHMENTS

1. CEQA Notice of Exemption for
Bridge Housing at 1533-35 N Schrader Blvd Lease
and
2. CEQA Notice of Exemption for
1920 West 3rd Street (Caza Azul) Bridge Housing Lease

ATTACHMENT No. 1

CEQA Notice of Exemption for
Bridge Housing at 1533-35 N Schrader Blvd Lease

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III - City CEQA Guidelines)

The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, and Office of Planning and Research pursuant to Public Resources Code Section 21080.27(c). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 13
PROJECT TITLE: Bridge Housing at 1533-35 N Schrader Blvd Lease	LOG REFERENCE C.F. 20-0841 - S25

PROJECT LOCATION: 1533-35 N. Schrader Boulevard, Bridge Housing, Los Angeles, CA 90028, in the Hollywood Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 593 E4

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The Bridge Housing at 1533-35 N. Schrader Boulevard Lease project (Project) consists of an extended, or new lease, for approximately one year with continued use/operation, for approximately four years total use of the temporary bridge housing facility. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide approximately one additional year, to the previously approved three years of emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2022, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
---	---

EXEMPT STATUS: <input checked="" type="checkbox"/> STATUTORY	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u> 15269(c)	<u>CA PUBLIC RESOURCE CODE</u> 21080(b)(4) & 21080.27
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guidelines, Section 15269(c); and Public Resources Code, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters. This determination is consistent with the NOE's supporting documents in Council File (CF) No. 18-0352, and consistent with, and supported by, the City Council's prior actions and resolution approving constructing, leasing, and using this shelter and determining its exemption from CEQA on December 11, 2018 (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: <div style="text-align: right;">Maria Martin</div>	TITLE: Environmental Affairs Officer Environmental Management Group	DATE:
FEE: 75.00 _____	RECEIPT NO.	REC'D BY
		DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project consists of approximately a one-year lease extension or new lease, and operation of the Bridge Housing for approximately one additional year in furtherance of providing an emergency homeless shelter in the City of Los Angeles at the bridge housing facility located at 1533-35 N. Schrader Boulevard in Los Angeles, California that was found to be categorically exempt and approved by City Council on December 11, 2018 (CF No. 18-0352). The documents supporting this determination (in CF No. 18-0352) are incorporated herein by reference, as support for this CEQA determination by City Council. This Project continues the existing use of the facility that was built, and is currently operating, without substantial change.

The shelter, which opened in April 2019, will continue to be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to *Crisis Housing Program for All Populations Scope of Required Services* (LAHSA, 2020-2021). A third-party service provider, e.g., People Assisting the Homeless (PATH), will operate the Project for the City, as it has been for the past several years, and it is anticipated that a new lease, lease extension, or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

By creating a stable environment and providing access to basic needs, participants will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will continue to be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project site is located on Schrader Boulevard south of Selma Avenue. Currently, the Project site houses the homeless shelter. The Project site is zoned C4-2D, with Regional Center Commercial land use designation, which is a nonresidential zone that allows for multifamily uses. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are institutional uses to the north and west of the site and commercial uses to the east and south.

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Based on information from the Census and the Los Angeles Homeless Services Authority (LAHSA),

in 2020, homeless persons constituted approximately 1.07 percent of the City's population. (U.S Census Bureau, 2021 & LAHSA, 2020)

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabalski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as Emergency Room (ER) visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*). During the first six months of 2020, LAPD reported 1,738 instances where a homeless individual was a victim of a serious crime including homicide, rape, aggravated assault, burglary, and larceny (LAPD, 2020).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (Commander Dominic H. Choi, 2019). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*). According to the LAPD Use of Force Year-End Report in 2020, among the 41,290 estimated homeless individuals throughout the City, 7,872 persons were reported to be victims of a violent or property crime. In the same year, 5,722 persons experiencing homelessness were reported as suspects of a violent or property crime. (LAPD, 2020). On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in

the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to

obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu, Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

LAHSA prepared a 2021 shelter point-in-time count for the City of Los Angeles that estimated the number and demographic characteristics of the sheltered homeless population on a single night in January 2021. Released in July 20, 2021, it shows that the homelessness emergency in the City of Los Angeles continues unabated and uncertain. The documented number of individuals experiencing sheltered homelessness increased yet again, as shown in *Table 4 - 2021 Housing Inventory Count and Shelter Count Data Summary* (LAHSA, 2021). The 2021 unsheltered street count could not be conducted due to the COVID-19 pandemic. However, the availability of vaccinations enabled the resumption of the Homeless Count for February 2022 with appropriate precautions (LAHSA, 2022).

Table 4 2021 Housing Inventory Count and Shelter Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	12,503	1% Increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

"We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19," said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. "It is important that we act now to protect this population and the compassionate people who serve them." (Corey Egel, 2020.)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations "with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness." (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless

population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the "need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19." (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor stated that "[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19," and "California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19." (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted "in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials." (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020

injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019, continues unabated in 2022 and was exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to "specific actions necessary to prevent or mitigate an emergency." Public Resources Code section 21060.3 defines Emergency as, "a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services." Section 21060.3 further provides that Emergency, "includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage."

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, "Emergency Projects," provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore, is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a "service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing." This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the Project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The shelter will continue to be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will continue to be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will continue to implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the shelter is service-enriched, focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project site is developed with a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem-solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families'

Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will continue to provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project site continues to provide emergency shelter. This shelter is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The shelter provides storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The shelter uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the shelter includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the family or individual's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services

- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The Project site is zoned C4-2D, with Regional Center Commercial land use designation, which is a nonresidential zone that allows for multifamily uses. The site is currently developed with a homeless shelter use, which is a residential use since it provides a temporary emergency residence for people experiencing homeless, as an interim home until they can find more a permanent home. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are institutional uses to the north and west of the site and commercial uses to the east and south of the site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2022 and City of L.A., Bureau of Engineering, Letter, NOE, and supporting NOE Narrative, CF No. 18-0352 (8/28/18)). Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The City has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement may also be met. However, the Project meets other requirements as described elsewhere in this document.

Moreover, in the prior approval of the project, the City Council approved Homeless Emergency Aid Program Funding to establish and operate the project (CF No. 18-0352 Municipal Facilities Committee (11/15/18), City Council action (12/11/2018)), which is qualified funding under AB 1197, and therefore at least a portion of the funding of the project related to its establishment and operation used qualified funding that qualifies the project for exemption under AB 1197. This is sufficient since it shows that the project is a qualified homeless shelter project.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves the continued lease and operation of an existing homeless shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

The Project Involves an Eligible Public Agency taking a Qualified Action under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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Attachment
Project Site Plan

ATTACHMENT No. 2

CEQA Notice of Exemption for
1920 West 3rd Street (Caza Azul) Bridge Housing Lease

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III - City CEQA Guidelines)

The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, and Office of Planning and Research pursuant to Public Resources Code Section 21080.27(c). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 1
PROJECT TITLE: 1920 West 3rd Street (Caza Azul) Bridge Housing Lease	LOG REFERENCE C.F. 20-0841- 525

PROJECT LOCATION: 1920 West 3rd Street (Caza Azul), Bridge Housing, Los Angeles, CA, 90057 in the Westlake Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 634 C2

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The 1920 West 3rd Street (Caza Azul) Bridge Housing Lease project (Project) consists of an extended, or new lease, for approximately one year with continued use/operation, for approximately four years total use of the temporary bridge housing facility. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide approximately one additional year, to the previously approved three years of emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2022, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA</u> <u>GUIDELINES</u>	<u>STATE CEQA</u> <u>GUIDELINES</u>	<u>CA PUBLIC</u> <u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guidelines, Section 15269(c); and Public Resources Code, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters. This determination is consistent with the NOE's supporting documents in Council File (CF) No. 18-0941, and consistent with, and supported by, the City Council's prior actions and resolution approving constructing, leasing, and using this shelter and determining its exemption from CEQA on December 11, 2018 (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Group	DATE:
FEE: 75.00 _____	RECEIPT NO.	REC'D BY
		DATE

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I. PROJECT DESCRIPTION, CONTINUED

The Project consists of approximately a one-year lease extension or new lease, and operation of the Bridge Housing for approximately one additional year in furtherance of providing an emergency homeless shelter in the City of Los Angeles at the bridge housing facility located at 1920 West 3rd Street in Los Angeles, California that was found to be categorically exempt and approved by City Council on December 11, 2018 (Council File 18-0941). The documents supporting this determination (in Council File No. 18-0941) are incorporated herein by reference as support for this CEQA determination by City Council. This Project continues the existing use of the facility that was built, and is currently operating, without substantial change.

The shelter, which opened in April 2019, will continue to be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to *Crisis Housing Program for All Populations Scope of Required Services* (LAHSA, 2020-2021). A third-party service provider, e.g., People Assisting the Homeless (PATH), will operate the project for the City, as it has been for the past several years, and it is anticipated that a new lease, lease extension, or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

By creating a stable environment and providing access to basic needs, participants will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will continue to be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project site is located between Westlake Avenue and Bonnie Brae Street with frontage along the south side of 3rd Street. The lot is zoned C2-1 which is a nonresidential zone that allows for multifamily uses. The site is currently developed with a homeless shelter, a residential use. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are residential uses to the north, east, and south of the site and commercial uses to the west.

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Based on information from the Census and the Los Angeles Homeless Services Authority (LAHSA), in 2020, homeless persons constituted approximately 1.07 percent of the City's population. (U.S Census Bureau, 2021 & LAHSA, 2020)

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabilski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as Emergency Room (ER) visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the *New England Journal of Medicine* found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, *Hospitalization Costs Associated with Homelessness in New York City*, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*). During the first six months of 2020, LAPD reported 1,738 instances where a homeless individual was a victim of a serious crime including homicide, rape, aggravated assault, burglary, and larceny (LAPD, 2020).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (Commander Dominic H. Choi, 2019). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*). According to the LAPD Use of Force Year-End Report in 2020, among the 41,290 estimated homeless individuals throughout the City, 7,872 persons were reported to be victims of a violent or property crime. In the same year, 5,722 persons experiencing homelessness were reported as suspects of a violent or property crime. (LAPD, 2020). On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-

Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu, Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1		
2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease

Table 1 2018 Homeless Count Data Summary		
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2 2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

LAHSA prepared a 2021 shelter point-in-time count for the City of Los Angeles that estimated the number and demographic characteristics of the sheltered homeless population on a single night in January 2021. Released in July 20, 2021, it shows that the

homelessness emergency in the City of Los Angeles continues unabated and uncertain. The documented number of individuals experiencing sheltered homelessness increased yet again, as shown in *Table 4 - 2021 Housing Inventory Count and Shelter Count Data Summary* (LAHSA, 2021). The 2021 unsheltered street count could not be conducted due to the COVID-19 pandemic. However, the availability of vaccinations enabled the resumption of the Homeless Count for February 2022 with appropriate precautions (LAHSA, 2022).

Table 4 2021 Housing Inventory Count and Shelter Count Data Summary		
	Number of Individuals	Change from 2020
Sheltered Homeless	12,503	1% Increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

"We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19," said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. "It is important that we act now to protect this population and the compassionate people who serve them." (Corey Egel, 2020.)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations "with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness." (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the "need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19." (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor stated that "[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19," and "California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19." (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted "in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials." (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019, continues unabated in 2022 and was exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to "specific actions necessary to prevent or mitigate an emergency." Public Resources Code section 21060.3 defines Emergency as, "a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services." Section 21060.3 further provides that Emergency, "includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage."

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, "Emergency Projects," provides examples of emergency projects exempt from the requirements of CEQA, including the following:

- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply
 - (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

- (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore, is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health

services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter project. For example, the Project’s programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor’s safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The shelter will continue to be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA’s Crisis and Bridge Housing Scope of Required Services, which will continue to be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will continue to implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants’ to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are

dedicated to assessing and reassessing needs, educating individuals on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the shelter is service-enriched, focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project site is developed with a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem-solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's

System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will continue to provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project site continues to provide emergency shelter. This shelter is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The shelter provides storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The shelter uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including this project, meet these requirements. Therefore, none of

the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the shelter includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA's Scope of Required Services.

The Housing Stability Plan is the family or individual's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person's situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services

- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The Project site is zoned C2-1, highway oriented commercial land use designation, which is a nonresidential zone that allows for multifamily uses. The site is currently developed with the homeless shelter use, which is a residential use since it provides a temporary emergency residence for people experiencing homeless, as an interim home until they can find more a permanent home. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are residential uses to the north, east and south of the site and commercial uses to the west of the site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2022. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The City has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement may also be met. However, the Project meets other requirements as described elsewhere in this document.

Moreover, in the prior approval of the project, the City Council approved Homeless Emergency Aid Program Funding to establish and operate the project (CF No. 18-0352 Municipal Facilities Committee (11/15/18), City Council action (12/11/2018)), which is qualified funding under AB 1197, and therefore at least a portion of the funding of the project related to its establishment and operation used qualified funding that qualifies the project for exemption under AB 1197. This is sufficient since it shows that the project is a qualified homeless shelter project.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves the continued lease and operation of an existing homeless shelter, as described

above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

The Project Involves an Eligible Public Agency taking a Qualified Action under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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RMM Decl.
Exhibit 68

RMM Decl.
Exhibit 68

HOLLY L. WOLCOTT
CITY CLERK

City of Los Angeles
CALIFORNIA

OFFICE OF THE
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER



ERIC GARCETTI
MAYOR

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213)978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.ORG

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 20-0841-S23

Council Meeting Date: May 31, 2022

Agenda Item No.: 26

Agenda Description: STATUTORY EXEMPTION and COMMUNICATION FROM THE BUREAU OF ENGINEERING (BOE) and HOMELESSNESS AND POVERTY COMMITTEE REPORT relative to COVID-19 Homelessness Roadmap funding recommendations and California Environmental Quality Act (CEQA) Notices of Exemptions (NOEs) for the construction of bridge housing facilities, tiny home village homeless shelters to provide crisis shelter services at 850 North Mission Road in Council District 14 and at 600 East 116th Place in Council District 15.

Council Action: COMMUNICATION FROM THE BUREAU OF ENGINEERING (BOE) AND HOMELESSNESS AND POVERTY COMMITTEE REPORT- ADOPTED

Council Vote:

YES	Blumenfield	YES	Bonin	YES	Buscaino
YES	Cedillo	YES	de León	YES	Harris-Dawson
YES	Koretz	YES	Krekorian	YES	Lee
YES	Martinez	YES	O'Farrell	YES	Price
YES	Raman	YES	Rodriguez	YES	Wesson, Jr.

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 341

FILE SENT TO MAYOR
LAST DAY FOR MAYOR TO ACT

06/01/2022

06/13/2022

APPROVED



6/7/2022

DATE SIGNED

Adopted Report(s) Title

Report from Homelessness and Poverty Committee 5-26-22

Report from Bureau of Engineering dated 5-20-22

BOARD OF PUBLIC WORKS
MEMBERS

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CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

DEPARTMENT OF
PUBLIC WORKS

BUREAU OF
ENGINEERING

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

May 20, 2022

The Honorable Nury Martinez
President
Los Angeles City Council

c/o Holly L. Wolcott
City Clerk
City Hall Room 360

CRISIS AND BRIDGE HOUSING FACILITIES - CD 14 N MISSION ROAD TINY HOME VILLAGE INTERIM HOUSING AT 850 NORTH MISSION ROAD AND CD 15 E 116TH PL TINY HOME VILLAGE AND PARKING IMPROVEMENTS AT 600 EAST 116TH PLACE (C.F. 20-0841) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF EXEMPTION (NOEs)

Dear President Martinez and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the construction of two bridge housing facilities, tiny home village homeless shelters, to provide crisis shelter services at 850 North Mission Road in Council District 14 and at 600 East 116th Place in Council District 15.

RECOMMENDATION

Staff recommends that Council determine the Crisis and Bridge Housing projects at 850 North Mission Road and 600 East 116th Place, which allow for the lease, construction, and use of these properties as temporary shelters for those experiencing homelessness, are statutorily exempt under Public Resources Code Section 21080(b)(4), as a specific actions necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters. Please refer to the attached NOEs.

Honorable Nury Martinez
May 20, 2022
Page 2 of 2

If you have any questions, please contact Maria Martin at Maria.Martin@lacity.org or (213) 485-5753.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jose Fuentes".

for
Gary Lee Moore, PE, ENV SP
City Engineer

Attachments

GLM/JF/mem
Q:\GLM\City Engineer\GLM Signed Documents\2022
Documents\TRANSMITTAL_CF20-0841_TinyHomes_850_N_Mission_Rd_and_600_
116th_PI_05-20-22

cc: Deborah Weintraub, Bureau of Engineering
Jose Fuentes, Bureau of Engineering
Marina Quinones, Bureau of Engineering
Maria Martin, Bureau of Engineering

ATTACHMENTS

1. Notice of Exemption (NOE) 14 N Mission Rd Tiny Home Village Interim Housing
2. Notice of Exemption (NOE) CD 15 E 116th Pl Tiny Home Village and Parking Improvements

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ATTACHMENT 1

Notice of Exemption (NOE)

CD 14 N Mission Rd Tiny Home Village Interim Housing

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CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 14
--	-------------------------------

PROJECT TITLE: CD 14 N Mission Rd Tiny Home Village Interim Housing	LOG REFERENCE C.F. 20-0841
--	--------------------------------------

PROJECT LOCATION: 850 N. Mission Road and 2212 Jesse Street, in the Boyle Heights Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 635 A3

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 14 N Mission Rd Tiny Home Village Interim Housing project (Project) consists of construction of a new homeless shelter on a City owned parcel, a lease, and operation of the homeless shelter with emergency housing structures or units for up to approximately 144 beds for families and/or individuals, including 70 units with standard double beds and four units with four Americans with Disabilities Act (ADA) compliant single beds, for people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2022, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
---	---

EXEMPT STATUS:	<u>CITY CEQA</u> <u>GUIDELINES</u>	<u>STATE CEQA</u> <u>GUIDELINES</u>	<u>CA PUBLIC</u> <u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guideline, Section 15269(c); and Public Resources Code, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters (see attached narrative).

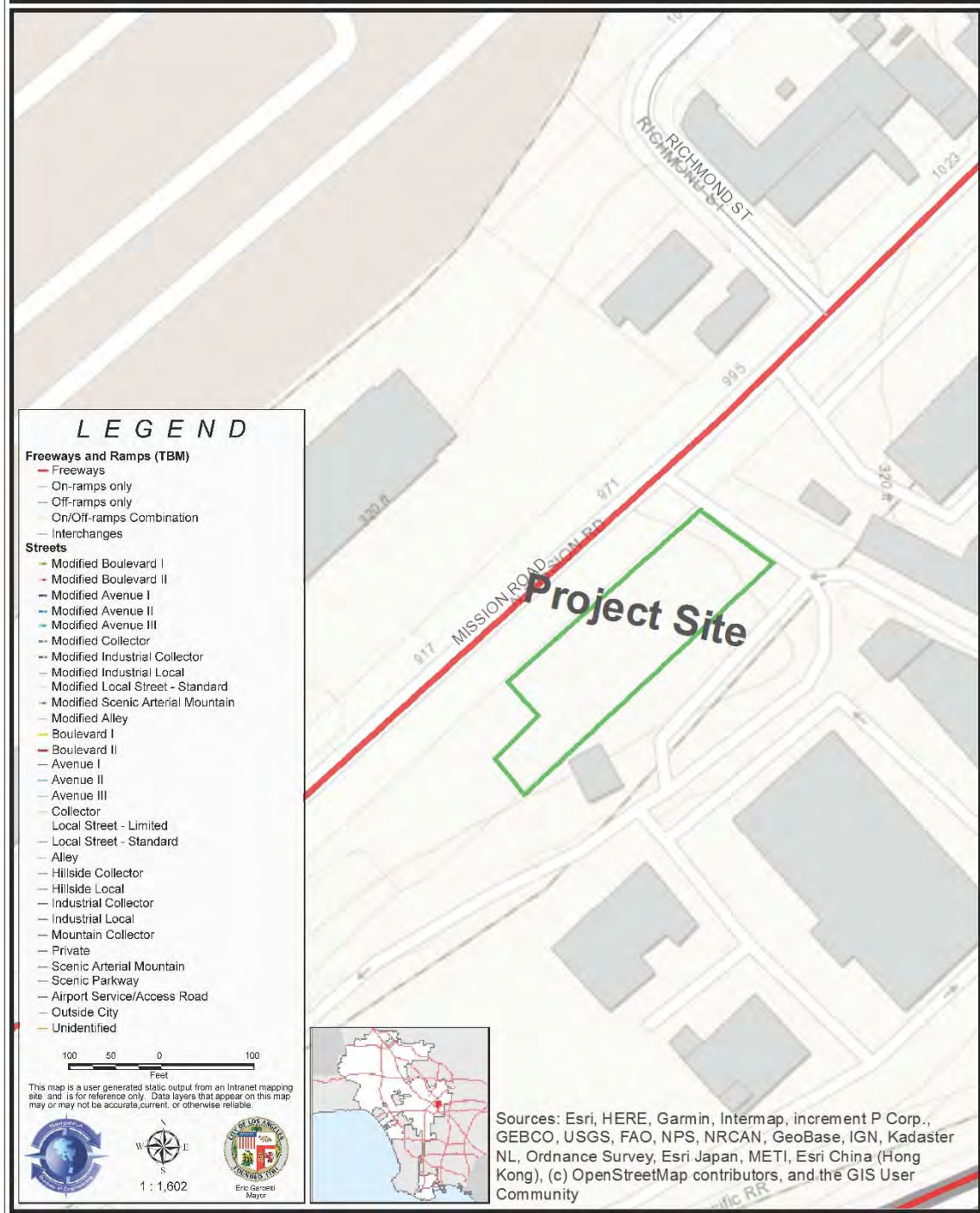
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE:
RECEIPT NO.	REC'D BY	DATE

DISTRIBUTION: (1) County Clerk; (2) Agency Record

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Figure 1: Project Location (Approximate Boundary)



EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project includes the construction of a new homeless shelter site, on a City-owned parcel at 850 N. Mission Road, that includes tiny homes with beds for up to 144 individuals experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. Tiny homes are small, detached, pre-fabricated cabins made of aluminum and composite materials that will be assembled on site. The Project is anticipated to include approximately 74 tiny homes, 70 with double beds (140 occupants) and 4 with ADA single beds; eight hygiene pallets with restrooms, showers, and lavatories; one laundry structure, four administration pre-fabricated structures, and two storage units. Refer to the Attachment for the Project site plans.

The site will also provide a main driveway entrance from Mission Road with a 20-foot sliding gate, a main pedestrian entrance and two emergency pedestrian exits, a guard booth, lockers, mobile seating areas with umbrellas, a pet area, approximately three staff parking stalls, approximately eight-foot high perimeter fencing with privacy slats, solid waste receptacles; and utility connections, including potable water, sanitary sewer, and electric service. Existing asphalt would be improved as required and some street tree trimming is anticipated. Sanitation bins currently located onsite will be relocated to another site that is pending planned development. The site is located at 2212 Jesse Street within the vicinity of the Mission Road and Jesse Street intersection. The site improvements related to the relocation of the bins at 850 N. Mission Road, consist of the development of an approximately 20,000 square foot empty lot owned by LASAN to be paved with new asphalt and installation new security lighting. The improvements include grading, drainage, trenching for power/lighting, and fencing. The complete redevelopment of the site as well as a proposed street vacation of the right-of-way along Jesse Avenue are underway under a separate CEQA review. Tree trimming would be conducted under a certified arborist in accordance with applicable City policy and the Migratory Bird Treaty Act, and in consultation with StreetsLA Urban Forestry Division.

The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to Crisis Housing Program for All Populations Scope of Required Services (LAHSA, 2020-2021). A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project operation will include approximately twenty employees working three shifts throughout the day with site security provided on a 24/7 basis or per a security plan consistent with the Los Angeles Homeless Services Authority's (LAHSA) standards. By creating a stable environment and providing access to basic needs, clients will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section.

A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project site is located on a parcel segment approximately 33,700 square-foot area comprised of City owned parcel currently used as a Sanitation Yard on Mission Road, southwest of the Mission Road and Marengo Street intersection. The Project site parcels are zoned M1-2D-RIO-CUGU which is a nonresidential zone that does allow for multifamily uses under certain circumstances. The site is currently developed with an industrial use. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. Industrial uses are located to the north, east, south, and west of the Project site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2016 and 2022).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabitski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent

with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1		
2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2		
2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

“We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19,” said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. “It is important that we act now to protect this population and the compassionate people who serve them.” (Corey Egel, 2020.)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations “with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness.” (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the “need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19.” (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor stated that “[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19,” and “California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19.” (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted “in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials.” (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be

struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter

project. For example, the Project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community

resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's

System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 144 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's

emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is “low barrier” within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA’s Scope of Required Services.

The Housing Stability Plan is the family or individual’s service plan that summarizes the participant’s housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person’s situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support

- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted

above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The lot is zoned M1-2D-RIO-CUGU which is a nonresidential zone that allows for multifamily uses under certain circumstances. The site is currently developed with an industrial use. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. Industrial uses are located to the north, east, south, and west of the Project site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2016 and 2022).

The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses, industrial uses. The Project site is located within an urban area on a parcel that is currently developed with a parking lot and is surrounded by qualified urban uses. Therefore, the site meets the definition of infill site. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The City has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement may also be met. However, the Project meets other requirements as described elsewhere in this document.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves construction of a new homeless shelter, lease, and operation of an emergency homeless shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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Attachment
Project Site Plan

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ATTACHMENT 2

Notice of Exemption (NOE)

CD 15 E 116th PI Tiny Home Village and Parking Improvements

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CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 15
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PROJECT TITLE: CD 15 E 116 th PI Tiny Home Village and Parking Improvements	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 600 E 116th Place, in the Southeast Los Angeles Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 704 D7 to 704 E7

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 15 E 116th PI Tiny Home Village and Parking Improvements (Project) consists of construction of a new homeless shelter on an existing California Department of Transportation (Caltrans) Park & Ride lot, parking improvements to the remaining park & ride lot, a lease, and operation of the homeless shelter with emergency sleeping cabins for up to approximately 41 beds for families and/or individuals, including 36 cabins, 29 with standard single beds, five cabins with standard double beds, and two cabins with Americans with Disabilities Act (ADA) compliant single beds, for people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2022, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guideline, Section 15269(c); and Public Resources Code, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE:
RECEIPT NO.	REC'D BY	DATE

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project consists of the partial use of approximately 18,925 square feet of the Avalon Green Line Park & Ride lot for the construction of a new homeless shelter and parking improvements to the remaining of the 38,000-square foot lot. The shelter includes tiny homes with beds for up to 41 individuals experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. The tiny homes are small, detached, pre-fabricated cabins made of aluminum and composite materials that will be assembled on site. The Project is anticipated to include approximately 36 tiny homes; 29 with standard single beds, five with standard double beds, and two with ADA single beds; three pre-fabricated hygiene structures with restrooms, showers, and lavatories (two ADA, one standard); one laundry structure with service sink and drinking fountain, one pre-fabricated administration/flexible space structure, and one storage pallet. The site will also provide drive through access from 116th Place with a ten-foot double gate, a main pedestrian entrance, a guard booth, lockers, mobile seating areas with umbrellas, storage containers, a pet area, approximately three staff parking stalls, eight-foot high perimeter fencing with privacy slats, dumpsters; and utility connections, including potable water, sanitary sewer, and electric service. Existing asphalt would be improved as required. Some street tree trimming is anticipated and removal of one or two trees may be needed. Tree trimming and removal would occur in accordance with City policy, the Migratory Bird Treaty Act, and under the supervision of a certified arborist. Refer to Attachment A for the Project site plans.

The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to Crisis Housing Program for All Populations Scope of Required Services (LAHSA, 2020-2021). A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The shelter operation will include three shifts throughout the day with site security provided on a 24/7 basis or per a security plan consistent with the Los Angeles Homeless Services Authority's (LAHSA) standards. By creating a stable environment and providing access to basic needs, residents will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The parking lot improvements include a new driveway and curb cut, a new van ADA parking stall, ADA signage; and minor modifications and restriping in affected areas as required, approximately 19,000 square feet of asphalt resurfacing, and restriping of the

stalls to include approximately 40 total parking stalls, including 34 standard and six (five existing and the new van) ADA stalls.

The Project site is located on a Caltrans Park & Ride lot, southeast of the Avalon Boulevard and 116th Place intersection. The site consists of ten rectangular shaped lots with an area of approximately 38,000 square feet and frontages along 116th Place and Avalon Boulevard. The lots are zoned PF-1 which is a nonresidential zone that allows for multifamily uses under certain circumstances. The site is currently developed with a surface parking lot. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are residential uses to the north and west of the site and surface transportation facilities to the south of the site. (City of Los Angeles Department of City Planning, 2016 and 2022).

II. PROJECT HISTORY

A. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas Zabilski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, however it is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Barrow,

Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Hibbs, Jonathan R., MD, et. al., 1994). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Morrison, 2009).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, 2017). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City's homeless population. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018

Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

Table 1 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary in Table 1 (LAHSA, 2020).

Table 1		
2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

Table 2		
2019 Homeless Count Data Summary (Revised 07/20/2020)		
	Number of Individuals	Change from 2018
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary* (LAHSA, 2020).

Table 3 2020 Homeless Count Data Summary		
	Number of Individuals	Change from 2019
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

C. Emergency Related to COVID-19 Pandemic Impacting Homeless Community

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

“We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19,” said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. “It is important that we act now to protect this population and the compassionate people who serve them.” (Corey Egel, 2020.)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations “with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness.” (California Dept. of Public Health, 2020). Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor's Executive Order No. N-25-20 noted the “need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19.” (Governor Gavin Newsom, 2020). On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California's shelter and housing inventory to slow the spread of the pandemic....

The Governor stated that “[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19,” and “California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19.” (California Governor, Press Release (Governor Gavin Newsom, 2020).

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted “in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials.” (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live (The Honorable Judge David O. Carter, 2020). Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be

struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community.

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

A. The Project is Exempt Pursuant to the Emergency CEQA Statutory Exemption (PRC Section 21080(b)(4))

Public Resources Code Section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (Governor's Office of Planning and Research, 2018) Section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

- (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

- (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic for all of the reasons set forth above in Part II (Project History). The Project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell, 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019).

2. The Project Meets the Definition of a Low Barrier Navigational Center in Government Code Section 65660

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds and operates emergency shelters, such as this Project, to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Service-Enriched Shelter with Case Managers Connecting to Services. The requirements are met by this Project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect families experiencing homelessness to income, public benefits, health services, shelter and housing.” This Project provides temporary housing, with case managers staffing the facility that provide connections to homeless family services and assistance for the occupants. This is one of the fundamental purposes of this shelter

project. For example, the Project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both families and providers, and helps families rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Care services create a culture of nonviolence, learning, and collaboration.

The Project will be operated by service providers coordinated with the Los Angeles Homeless Services Authority (LAHSA). The intention of this emergency shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement.

Per LAHSA's Crisis and Bridge Housing Scope of Required Services, which will be followed for operating the shelter in this Project, service providers that oversee an emergency shelter must provide case management services and develop a Housing Stability Plan with each person. The shelter will program implement a case management and service plan known as Housing-Focused Case Management and Support Services (HFCMSS). HFCMSS includes but is not limited to: support with completing housing applications, accompanying the individual to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days. Housing Navigation services may be provided onsite or offsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with individuals are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating individuals on community

resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits. Thus, the project is a service-enriched shelter focused on moving individuals into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery from homelessness, and that centers on providing or connecting people experiencing homelessness to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

Housing First also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to successfully divert an individual from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, service providers continue to have such problem solving conversations with the individual while residing in Crisis and Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The emergency shelters are operated by service providers coordinated through LAHSA. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA's Program Standards, all eligible participants are to be served with a Housing First approach. LAHSA's CES for Families' Principles and Practices that were approved by the CES Policy Council on August 23, 2017 shall be used to guide the development of systems-level policy and to ensure transparent and accountable decision-making with privately owned Service Providers who enter into a partnership with LAHSA. The basic underlying principle of LAHSA's

System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers.

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

Low Barrier. "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this Project, meet these requirements.

The Project provides approximately 41 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The Project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for some possessions, and management and design for individuals' privacy. All of the City's

emergency shelters, including this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is “low barrier” within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the Project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

3. The Project Complies with Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

Connecting to Permanent Housing through a Services Plan. Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect families and individuals to permanent housing through a services plan that identifies services staffing. This Project meets that requirement. As noted above, the Project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA’s Scope of Required Services.

The Housing Stability Plan is the family or individual’s service plan that summarizes the participant’s housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the family or individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the family or person’s situation changes and steps are completed or revised accordingly.

Families and individuals are assisted with a range of activities that address the stated goals of the family or individual in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services
- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support

- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Progress and problems implementing the plan are reviewed and updated frequently.

Coordinated Entry System. Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect families and individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. Case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The shelter will collaborate with Los Angeles County Case Entry System Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

Compliance with Welfare and Institutions Code. Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted

above, the City's emergency shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD required all Continuum of Care applicants to demonstrate progress in implementing a Homeless Management System (HMIS). LAHSA led a regional planning process, encompassing three Continuums of Care - Los Angeles, Glendale, and Pasadena. This process resulted in the selection of a system that would not only satisfy the HUD mandate, but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

Housing Stability Plans are tracked in a Homeless Management Information System (HMIS) along with the date of completion. Case managers complete a Monthly Update with the family to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked, and information is provided to families in HMIS with the goal of the individuals achieving housing stability and sustainability upon exit from the program. Exit destination information is also collected. Accordingly, the Project meets the HMIS requirements.

In sum, based on the above-noted information, which is additionally explained in more detail in the documents from LAHSA cited in the Reference section to this document, the Project meets the requirements set forth in Government Code Section 65662.

4. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The Project site is zoned PF-1 which is a nonresidential zone that allows for multifamily uses under certain circumstances. The site is currently developed with a surface parking lot. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are residential uses to the north and west of the site and surface transportation facilities to the south of the site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2016 and 2022).

The Project site is an infill site that is bounded by parcels that are developed with qualified urban uses, industrial uses.

The Project site is located within an urban area on parcels that is currently developed with a parking lot and is surrounded by qualified urban uses. Therefore, the site meets the definition of infill site. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The City has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement may also be met. However, the Project meets other requirements as described elsewhere in this document.

6. The City's Actions Qualify under AB 1197 as Actions in Furtherance of Providing Emergency Shelters in the City of Los Angeles

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This Project involves construction of a new homeless shelter, lease, and operation of an emergency homeless shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

7. AB 1197 Conclusion

Based on the above-noted information, the Project is exempt from CEQA pursuant to Public Resources Code Section 21080.27.

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Attachment
Project Site Plan

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On October 7, 2024, I served the foregoing documents described as: **Declaration of Robert Mahlowitz in Support of the City of Los Angeles' Opening Trial Brief – Vol. 2 of 3** on all interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

[X] BY ELECTRONIC MAIL – I electronically transmitted the document listed above to the email address stated above which has been confirmed for each addressee stated above. My electronic service address is leilany.roman@lacity.org.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 7, 2024, at Los Angeles, California.


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Case Number: 23STCP04410
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