

ATTACHMENT

BOE Report Council File 20-0841-S49

CEQA Notice of Exemption for
Bridge Housing at 3248 Riverside Dr. Lease
and

CEQA Notice of Exemption for
CD 5 1479 S La Cienega Bl Bridge Housing Facility Lease

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 (PRC) Section 21152(b), and with the state Office of Planning and Research pursuant to PRC Section 21080.27(c), when applicable; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC 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

4

PROJECT TITLE:

Bridge Housing at 3248 Riverside Dr. Lease

LOG REFERENCE

CF 20-0841-S49

PROJECT LOCATION: 3248 Riverside Drive, in the Hollywood Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1, Project Location. T.G. 594-C2

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The Bridge Housing at 3248 Riverside Dr. Lease project (Project) consists of an extended, or new lease, for approximately up to one year with continued use/operation, for approximately up to five years total use of the temporary bridge housing/navigation center 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 four 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 _____, 2024, the Board of Recreation and Park Commission (Board) determined the Project is exempt under the California Environmental Quality Act (CEQA) and approved the Project. On _____, 2024, the City Council determined the Project is exempt under CEQA and approved the Project.

CONTACT PERSON

Maria Martin (Maria.Martin@lacity.org)

TELEPHONE NUMBER

(213) 485-5753

EXEMPT STATUS:

	<u>GOVERNMENT CODE SECTIONS</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY	65660(b) & 8698.4(a)(4)	15269(c)	21080.27 & 21080(b)(4)

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under PRC Section 21080.27 and Government Code Section 65660(b), applicable to City low barrier navigation centers, Government Code Section 8698.4(a)(4), governing homeless shelter projects under a shelter crisis declaration, and PRC Section 21080(b)(4) and State CEQA Guidelines, 14 California Code of Regulations (CCR) Section 15269(c) as specific actions necessary to prevent or mitigate an emergency. This determination is consistent with the Notices of Exemption (NOE) supporting documents in Board File Nos. 19-179 and 23-110; and Council File (CF) Nos. 19-0126 and 20-0841-S35; 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: Maria Martin	TITLE: Environmental Affairs Officer BOE Environmental Management Group	DATE:
RECEIPT NO.	REC'D BY	DATE

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FIGURE 1: PROJECT LOCATION



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/navigation center in the City at the Bridge Housing facility located on a City-owned property at 3248 (3210 and 3428 also used previously) Riverside Drive. The development and operation of the facility were found to be statutorily exempt and approved by the Board of Recreation and Park Commissioners on September 4, 2019 (Board Report No. 19-179) and subsequently by the City Council on December 10, 2019 (CF No. 19-0126). A one-year lease extension, which extended the term of the lease to July 7, 2024, and continued use of the facility were approved by the Board on June 1, 2023 (Board Report No. 23-110) and subsequently by the City Council on August 1, 2023 (CF 20-0841-S35). The documents supporting those determinations (Board File Nos. 19-179 and 23-110; and CF Nos. 19-0126 and 20-0841-S35) 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 approximately 100 bed shelter, which opened in July 2020, is located on three irregularly shaped lots with a combined area of approximately 180,341 square feet with frontage along Riverside Drive on a portion of Griffith Park. The Shelter and its associated amenities include a 10,800 square-foot membrane structure with approximately 100 beds, a 1,080-square foot hygiene trailer, a 1,080-square foot administration/intake trailer, bin storage area, approximately 1,000 square feet of elevated deck with stairs and ramps, a 680-square foot outdoor pet area, and general open space.

The shelter/navigation center will continue to be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters, low barrier navigation centers, and transitional homeless facilities including, but not limited to the following project requirements as they exist and are updated by the LAHSA:

- 2022-2023 LAHSA Program Standards, <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- 05/15/2023 Crisis/Bridge Housing for Adult Programs Scope of Required Services (SRS), <https://www.lahsa.org/documents?id=7216-scope-required-services-srs-crisis-bridge-housing-for-adults-program-srs-final-fy2023-2024.pdf>
- 2023-2024 LAHSA Facility Standards, <https://www.lahsa.org/documents?id=2767-lahsa-facility-standards.pdf>

All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Additional relevant LAHSA operations documents are cited in the reference section of this document. Based on the LAHSA operational standards implemented for the City's shelters, the project qualifies as a low barrier navigation center and shelter under the CEQA exemptions discussed in this document.

A third-party service provider, e.g., People Assisting the Homeless (PATH), will operate

the Project for the City 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.

LAHSA's Coordinated Entry System (CES) will be used to enter participants and facilitate service providers conducting assessments and providing services to connect people to permanent housing. (LAHSA CES Brochure, <https://www.lahsa.org/documents?id=1500-coordinated-entry-system-ces-brochure.pdf>.) 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.

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.

According to LAHSA's project requirements, 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 and 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.

Case managers and the Project will not provide 24-hour nonmedical care of persons in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual.

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. The project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law). "Housing First" means an 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 low barrier navigation centers, 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 Project will continue to be 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 intention of this low barrier navigation center 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.

Low Barrier. This Project is low barrier in that, among other things, (1) facility design allows for the presence of partners at the low barrier navigation center; (2) participants' pets are allowed in the facility, which provides a pet area; (3) the storage of possessions is provided in the a bin storage area; and (4) privacy to participants is provided with partitions. The City intends for this Project to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Funding. The City identified and allocated Homeless Housing, Assistance, and Prevention (HHAP) Program funds for the construction and operation of the facility and anticipates allocating some HHAP funds for the continued operation of the shelter. All of the Project's costs are publicly funded.

II. CEQA EXEMPTIONS

A. Public Resources Code Section 21080.27

The Project is statutorily exempt from the requirements of CEQA pursuant to PRC section 21080.27(b), subparts (2), (3), and (5). Section 21080.27(b) specifically exempts certain City actions concerning low barrier navigation centers from CEQA. In its amendment to Section 21080.27 adopted October 10, 2023, and effective January 1, 2024, exempting City low barrier navigation centers providing shelter to people experiencing homelessness, the Legislature found and declared as part of the statute's purposes that in 2022, statistics documented that 41,980 people experience homelessness in the City. (CA LEGIS 726 (2023), 2023 Cal. Legis. Serv. Ch. 726 (A.B. 785) (WEST)).

Section 21080.27(b) provides that CEQA, "does not apply to any of the following activities undertaken by the City of Los Angeles within the City of Los Angeles: . . . (2) An action to lease . . . land for . . . a low barrier navigation center; (3) An action to facilitate the lease . . . of land owned . . . for . . . a low barrier navigation center; and . . . (5) An action to provide financial assistance in furtherance of implementing . . . a low barrier navigation center . . ."

Section 21080.27(a)(6), states that a "low barrier navigation center" is a facility that meets the definition provided at Government Code section 65660(a) and is funded, "in whole or in part" by a series of sources including, (A) the Homeless Housing, Assistance, and Prevention program [HHAPP] established pursuant to Section 50217 of the Health and Safety Code; (B) Measure H sales tax proceeds approved by the voters at the March 7, 2017, special election in the County of Los Angeles; (C) general obligation bonds issued pursuant to Proposition HHH, approved by the voters of the City of Los Angeles at the

November 8, 2016, statewide general election; (D) the program referred to as Homekey, as described in Section 50675.1.1 of the Health and Safety Code; (E) the Encampment Resolution Funding program established pursuant to Section 50251 of the Health and Safety Code; (F) the Building Homes and Jobs Trust Fund established pursuant to Section 50470 of the Health and Safety Code; (G) the Behavioral Health Bridge Housing Program established pursuant to Item 4260-101-0001 of Section 2.00 of the Budget Act of 2022; (H) the Behavioral Health Continuum Infrastructure Program established pursuant to Chapter 1 (commencing with Section 5960) of Part 7 of Division 5 of the Welfare and Institutions Code.

Government Code section 65660(a), in turn, provides the definition of “Low Barrier Navigation Center, as follows:

“Low Barrier Navigation Center” means 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. “Low Barrier” means best practices to reduce barriers to entry, and may include, but is not limited to, the following: (1) 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, (2) Pets, (3) The storage of possessions, and (4) Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.”

Further, because the Project is paid for entirely with public funds, and it is, in its entirety, a public work for purposes of Chapter 1 (commencing with Section 1720) of Part 7 of Division 2 of the Labor Code and Public Resources Code Section 21080.27(e)(1)(A), because any construction, alteration, demolition, installation, or repair work associated with the Project will be funded in whole or in part out of public funds and the City will require prevailing wages for all such work, to the extent applicable, as required by Charter Section 377, the Project is not subject to the requirements of subdivision (e) of PRC Section 21080.27.

As shown by the facts stated above in the Project Description, the Project qualifies as exempt from the requirements of CEQA Pursuant to PRC section 21080.27 because it meets the definition of Low Barrier Navigation Center in Government Code Section 65660(a), is funded by qualifying funds, and involves the leasing of land, facilitating the leasing of land, and financial assistance in the furtherance of implementing a low barrier navigation center.

B. Government Code Section 65660(b)

The Project is statutorily exempt from the requirements of CEQA pursuant to Government Code Section 65660(b) which states, “[CEQA] shall not apply to actions taken by a public agency to lease . . . land owned by a public agency, or to facilitate the lease . . . of land owned by a public agency, or to provide financial assistance to, or otherwise approve, a

Low Barrier Navigation Center constructed or allowed by this section.” As stated above, and noted in the Project Description, the Project meets the definition of Low Barrier Navigation Center as defined by Section 65660. The City is a public agency and the Project involves actions to lease, convey or encumber and facilitate the lease, conveyance, or encumbrance of the City’s land, and to provide financial assistance to, or otherwise approve, a Low Barrier Navigation Center under Section 65660. Based on this, the Project qualifies for the statutory exemption from CEQA in Government Code Section 65660(b).

C. Government Code Section 8698.4

The Legislature enacted Government Code Section 8698.4 to authorize a municipality to enact a shelter crisis declaration. Once a shelter crisis declaration is in place, Emergency housing may include homeless shelters for the homeless located or constructed on any land owned or leased by a city (Gov. Code, § 8698.4(a)(1)). Subsection (a)(4) of Government Code Section 8698.4 provides, “The California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) shall not apply to actions taken by a . . . city . . . to lease . . . land owned by a city . . . , or to facilitate the lease . . . of land owned by the local government for, or to provide financial assistance to, a homeless shelter constructed or allowed by this section.” Subpart (a)(2)(B) of Section 8698.4, provides that the provisions of the Section apply only to a public facility or homeless shelters reserved entirely for the homeless pursuant to Chapter 7.8 of the Government Code.

The City Council declared a shelter crisis on April 17, 2018, and the declaration remains in effect. (City Council File Nos. 15-1138-S30, 15-1138-S33, and 15-1138-S40). The City codified the ordinance allowing shelters during a shelter crisis declaration at Los Angeles Municipal Code (LAMC) section 12.80, which states,

Notwithstanding any provisions of this article to the contrary, during any period for which the Mayor and/or the City Council have declared a shelter crisis within the meaning of Government Code Sections 8698, et seq., a shelter for the homeless (as defined in Section 12.03 of this Code) may be established and operated on property owned or leased by the City of Los Angeles in any zone as a matter of right without regard to the number of beds or number of persons served.”

LAMC Section 12.03 states,

A facility operated by a “provider”, other than a "community care facility" as defined in California Health and Safety Code Section 1502, which provides temporary accommodations to homeless persons and/or families and which meets the standards for shelters contained in Title 25, Division 1, Chapter 7 of the California Code of Regulations. The term “temporary accommodations” means that a homeless person or family will be allowed to reside at the shelter for a time period not to exceed six months. For the purpose of this definition, a "provider" shall mean a government agency,

religious institution, non-profit charitable organization, or private non-profit organization which provides, or contracts with recognized community organizations to provide, emergency or temporary shelter for the homeless, and which has been certified by the Housing Department of the City of Los Angeles to meet all applicable requirements contained in the California Health and Safety Code and the California Code of Regulations.

The State Department of Social Services' regulations at 22 CCR Section 80007(a)(7) provide that a Community Care Facility does not include any homeless shelter which provides no element of "care and supervision", as defined in 22 CCR section 80001(c)(2).¹ Care and supervision, "means any one or more of the following activities provided by a person or facility to meet the needs of the clients: (A) Assistance in dressing, grooming, bathing and other personal hygiene. (B) Assistance with taking medication, as specified in Section 80075. (C) Central storing and/or distribution of medications, as specified in Section 80075. (D) Arrangement of and assistance with medical and dental care. (E) Maintenance of house rules for the protection of clients. (F) Supervision of client schedules and activities. (G) Maintenance and/or supervision of client cash resources or property. (H) Monitoring food intake or special diets. (I) Providing basic services as defined in section 80001(b)(2)." (22 CCR § 80001(c)(3)).

The Project meets the requirements of Government Code 8698.4(a)(4) because it involves a City lease of City-owned (RAP-controlled) land for a homeless shelter and the Project consists of the City providing financial assistance to the same. The Project is entirely reserved for the homeless. Pursuant to Government Code Section 8698.4, the Project is statutorily exempt from the requirements of CEQA.

D. Public Resources Code Section 21080 and CEQA Guideline Section 15269

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."

Title 14, California Code of Regulations 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

¹ Examination of 22 CCR § 80001 demonstrates a typo at Section 80001 because "care and supervision" is defined at subpart (c)(3) of 80007 and not subpart (c)(2).

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.

As detailed below, 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. 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/low barrier navigation center provided by this Project.

1. 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).

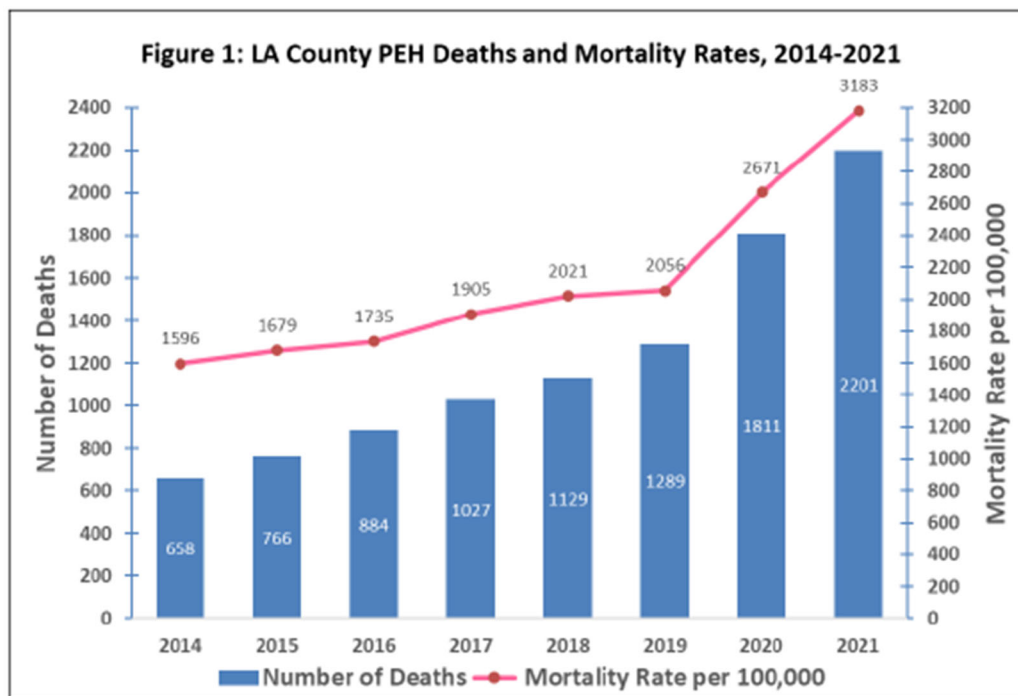
Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated 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).

2. 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 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 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 on 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 its 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

Table 5 2022 Homeless Count Data Summary		
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.

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.)

3. The Project is Exempt from CEQA Compliance as an Action to Prevent or Mitigate an Emergency

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. 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/low barrier navigation center 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 (PRC) Section 21152(b), and with the state Office of Planning and Research pursuant to PRC Section 21080.27(c), when applicable; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC 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 5
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PROJECT TITLE: CD 5 1479 S La Cienega Bl Bridge Housing Facility Lease	LOG REFERENCE CF 20-0841-S35
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PROJECT LOCATION: 1479 S. La Cienega Boulevard, in the Wilshire Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1, Project Location. T.G. 632-J4

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 5 1479 S La Cienega Bl Bridge Housing Facility Lease project (Project) consists of an extended, or new lease, for approximately up to one year with continued use/operation of the interim housing/navigation center 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 the community being served, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2024, the City Council determined the Project is 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:	GOVERNMENT <u>CODE</u>	STATE CEQA <u>GUIDELINES</u>	CA PUBLIC <u>RESOURCE CODE</u>
STATUTORY	65660(b) & 8698.4(a)(4)	15269(c)	21080.27 & 21080(b)(4)

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under PRC Section 21080.27 and Government Code Section 65660(b), applicable to City low barrier navigation centers, Government Code Section 8698.4(a)(4), governing homeless shelter projects under a shelter crisis declaration, and PRC Section 21080(b)(4) and State CEQA Guidelines, 14 California Code of Regulations (CCR) Section 15269(c) as specific actions necessary to prevent or mitigate an emergency. This determination is consistent with the Notice of Exemption (NOE) supporting documents in Council File (CF) No. 19-1350; and consistent with, and supported by, the City Council's prior actions approving the lease and use of this shelter (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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Figure 1: Project Location



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 emergency interim housing/navigation center in the City at the facility located on a privately-owned property at 1479 S. La Cienega Boulevard. The funding, lease, and operation of the facility were found to be statutorily exempt and approved by the City Council on March 17, 2020 (CF No. 19-1350). The documents supporting this determination (CF No. 19-1350) are incorporated herein by reference as support for this CEQA determination. This Project continues the existing use of the facility, that was funded, leased, and is currently operating, without substantial change.

The approximately 54 bed shelter, which opened in June 2020, is located on an irregularly shaped 12,159-square foot privately-owned parcel that includes two lots currently developed as a 5,926-square foot, seventeen-room interim housing/navigation facility with an intake office, an ICMS office, a Community Room, and nine parking spaces.

The shelter/navigation center will continue to be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters, low barrier navigation centers, and transitional homeless facilities including, but not limited to the following project requirements as they exist and are updated by the LAHSA:

- 2022-2023 LAHSA Program Standards, <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- 2023-2024 LAHSA Tiny Home Interim Housing Program, Scope of Required Services, <https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2023-2024.pdf>
- 05/15/2023 Crisis/Bridge Housing for Adult Programs Scope of Required Services (SRS), <https://www.lahsa.org/documents?id=7216-scope-required-services-srs-crisis-bridge-housing-for-adults-program-srs-final-fy2023-2024.pdf>
- 2023-2024 LAHSA Facility Standards, <https://www.lahsa.org/documents?id=2767-lahsa-facility-standards.pdf>

All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Additional relevant LAHSA operations documents are cited in the reference section of this document. Based on the LAHSA operational standards implemented for the City's shelters, the project qualifies as a low barrier navigation center and shelter under the CEQA exemptions discussed in this document.

A third-party service provider, e.g., People Assisting the Homeless (PATH), will operate the Project for the City 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.

LAHSA's Coordinated Entry System (CES) will be used to enter participants and facilitate

service providers conducting assessments and providing services to connect people to permanent housing. (LAHSA CES Brochure, <https://www.lahsa.org/documents?id=1500-coordinated-entry-system-ces-brochure.pdf>.) 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.

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.

According to LAHSA's project requirements, 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 and 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. The project complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law). "Housing First" means an 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 low barrier navigation centers, 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 Project will continue to be 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 intention of this low barrier navigation center 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.

Low Barrier. This Project is low barrier in that, among other things, (1) the operation of

the bridge housing facility and the separate rooms allow for the presence of partners at the low barrier navigation center; (2) participants' pets are allowed in the facility; (3) the storage of possessions is provided in the rooms; and (4) privacy to participants is provided in the rooms by providing partitions in rooms with more than two beds. The City intends for this Project to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Funding. The City identified and allocated HHAP Program funds for the operation of the facility and anticipates allocating additional HHAP funds for the continued operation of the shelter. All of the Project's costs are publicly funded.

II. CEQA EXEMPTIONS

A. Public Resources Code Section 21080.27

The Project is statutorily exempt from the requirements of CEQA pursuant to PRC section 21080.27(b), subparts (2), (3), and (5). Section 21080.27(b) specifically exempts certain City actions concerning low barrier navigation centers from CEQA. In its amendment to Section 21080.27 adopted October 10, 2023, and effective January 1, 2024, exempting City low barrier navigation centers providing shelter to people experiencing homelessness, the Legislature found and declared as part of the statute's purposes that in 2022, statistics documented that 41,980 people experience homelessness in the City. (CA LEGIS 726 (2023), 2023 Cal. Legis. Serv. Ch. 726 (A.B. 785) (WEST)).

Section 21080.27(b) provides that CEQA, "does not apply to any of the following activities undertaken by the City of Los Angeles within the City of Los Angeles: . . . (2) An action to lease . . . land for . . . a low barrier navigation center; (3) An action to facilitate the lease . . . of land owned . . . for . . . a low barrier navigation center; and . . . (5) An action to provide financial assistance in furtherance of implementing . . . a low barrier navigation center . . ."

Section 21080.27(a)(6), states that a "low barrier navigation center" is a facility that meets the definition provided at Government Code section 65660(a) and is funded, "in whole or in part" by a series of sources including, (A) the Homeless Housing, Assistance, and Prevention program [HHAPP] established pursuant to Section 50217 of the Health and Safety Code; (B) Measure H sales tax proceeds approved by the voters at the March 7, 2017, special election in the County of Los Angeles; (C) general obligation bonds issued pursuant to Proposition HHH, approved by the voters of the City of Los Angeles at the November 8, 2016, statewide general election; (D) the program referred to as Homekey, as described in Section 50675.1.1 of the Health and Safety Code; (E) the Encampment Resolution Funding program established pursuant to Section 50251 of the Health and Safety Code; (F) the Building Homes and Jobs Trust Fund established pursuant to Section 50470 of the Health and Safety Code; (G) the Behavioral Health Bridge Housing Program established pursuant to Item 4260-101-0001 of Section 2.00 of the Budget Act of 2022; (H) the Behavioral Health Continuum Infrastructure Program established pursuant to Chapter 1 (commencing with Section 5960) of Part 7 of Division 5 of the Welfare and Institutions Code.

Government Code section 65660(a), in turn, provides the definition of “Low Barrier Navigation Center, as follows:

“Low Barrier Navigation Center” means 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. “Low Barrier” means best practices to reduce barriers to entry, and may include, but is not limited to, the following: (1) 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, (2) Pets, (3) The storage of possessions, and (4) Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.”

Further, because the Project is paid for entirely with public funds, and it is, in its entirety, a public work for purposes of Chapter 1 (commencing with Section 1720) of Part 7 of Division 2 of the Labor Code and Public Resources Code Section 21080.27(e)(1)(A), because any construction, alteration, demolition, installation, or repair work associated with the Project will be funded in whole or in part out of public funds and the City will require prevailing wages for all such work, to the extent applicable, as required by Charter Section 377, the Project is not subject to the requirements of subdivision (e) of PRC Section 21080.27.

As shown by the facts stated above in the Project Description, the Project qualifies as exempt from the requirements of CEQA Pursuant to PRC section 21080.27 because it meets the definition of Low Barrier Navigation Center in Government Code Section 65660(a), is funded by qualifying funds, and involves the leasing of land, facilitating the leasing of land, and financial assistance in the furtherance of implementing a low barrier navigation center.

B. Government Code Section 65660(b)

The Project is statutorily exempt from the requirements of CEQA pursuant to Government Code Section 65660(b) which states, “[CEQA] shall not apply to actions taken by a public agency to lease . . . land owned by a public agency, or to facilitate the lease . . . of land owned by a public agency, or to provide financial assistance to, or otherwise approve, a Low Barrier Navigation Center constructed or allowed by this section.” As stated above, and noted in the Project Description, the Project meets the definition of Low Barrier Navigation Center as defined by Section 65660. The City is a public agency and the Project involves actions to lease, convey or encumber and facilitate the lease, conveyance, or encumbrance of the City’s land, and to provide financial assistance to, or otherwise approve, a Low Barrier Navigation Center under Section 65660. Based on this, the Project qualifies for the statutory exemption from CEQA in Government Code Section 65660(b).

C. Government Code Section 8698.4

The Legislature enacted Government Code Section 8698.4 to authorize a municipality to enact a shelter crisis declaration. Once a shelter crisis declaration is in place, Emergency housing may include homeless shelters for the homeless located or constructed on any land owned or leased by a city (Gov. Code, § 8698.4(a)(1)). Subsection (a)(4) of Government Code Section 8698.4 provides, “The California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) shall not apply to actions taken by a . . . city . . . to lease . . . land owned by a city . . . , or to facilitate the lease . . . of land owned by the local government for, or to provide financial assistance to, a homeless shelter constructed or allowed by this section.” Subpart (a)(2)(B) of Section 8698.4, provides that the provisions of the Section apply only to a public facility or homeless shelters reserved entirely for the homeless pursuant to Chapter 7.8 of the Government Code.

The City Council declared a shelter crisis on April 17, 2018, and the declaration remains in effect. (City Council File Nos. 15-1138-S30, 15-1138-S33, and 15-1138-S40). The City codified the ordinance allowing shelters during a shelter crisis declaration at Los Angeles Municipal Code (LAMC) section 12.80, which states,

Notwithstanding any provisions of this article to the contrary, during any period for which the Mayor and/or the City Council have declared a shelter crisis within the meaning of Government Code Sections 8698, et seq., a shelter for the homeless (as defined in Section 12.03 of this Code) may be established and operated on property owned or leased by the City of Los Angeles in any zone as a matter of right without regard to the number of beds or number of persons served.”

LAMC Section 12.03 states,

A facility operated by a “provider”, other than a “community care facility” as defined in California Health and Safety Code Section 1502, which provides temporary accommodations to homeless persons and/or families and which meets the standards for shelters contained in Title 25, Division 1, Chapter 7 of the California Code of Regulations. The term “temporary accommodations” means that a homeless person or family will be allowed to reside at the shelter for a time period not to exceed six months. For the purpose of this definition, a “provider” shall mean a government agency, religious institution, non-profit charitable organization, or private non-profit organization which provides, or contracts with recognized community organizations to provide, emergency or temporary shelter for the homeless, and which has been certified by the Housing Department of the City of Los Angeles to meet all applicable requirements contained in the California Health and Safety Code and the California Code of Regulations.

The State Department of Social Services’ regulations at 22 CCR Section 80007(a)(7) provide that a Community Care Facility does not include any homeless shelter which

provides no element of “care and supervision”, as defined in 22 CCR section 80001(c)(2).¹ Care and supervision, “means any one or more of the following activities provided by a person or facility to meet the needs of the clients: (A) Assistance in dressing, grooming, bathing and other personal hygiene. (B) Assistance with taking medication, as specified in Section 80075. (C) Central storing and/or distribution of medications, as specified in Section 80075. (D) Arrangement of and assistance with medical and dental care. (E) Maintenance of house rules for the protection of clients. (F) Supervision of client schedules and activities. (G) Maintenance and/or supervision of client cash resources or property. (H) Monitoring food intake or special diets. (I) Providing basic services as defined in section 80001(b)(2).” (22 CCR § 80001(c)(3)).

The Project meets the requirements of Government Code 8698.4(a)(4) because it involves a City lease of privately-owned land for a homeless shelter and the Project consists of the City providing financial assistance to the same. The Project is entirely reserved for the homeless. Pursuant to Government Code Section 8698.4, the Project is statutorily exempt from the requirements of CEQA.

D. Public Resources Code Section 21080 and CEQA Guideline Section 15269

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.”

Title 14, California Code of Regulations 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.

¹ Examination of 22 CCR § 80001 demonstrates a typo at Section 80001 because “care and supervision” is defined at subpart (c)(3) of 80007 and not subpart (c)(2).

As detailed below, 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. 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/low barrier navigation center provided by this Project.

1. 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

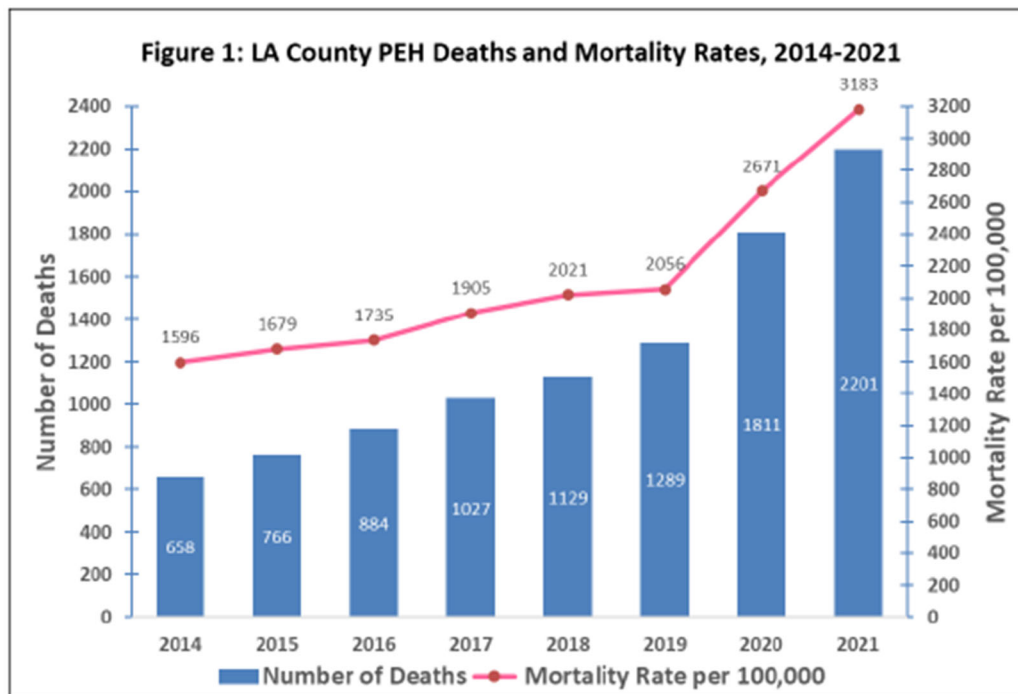
assault, burglary, and larceny (LAPD, 2020).

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).

2. 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

Table 3 2020 Homeless Count Data Summary		
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. 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 its 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.

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.)

3. The Project is Exempt from CEQA Compliance as an Action to Prevent or Mitigate an Emergency

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. 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/low barrier navigation center 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.

III. REFERENCES

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