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<http://eng.lacity.org>

September 5, 2024

The Honorable Paul Krekorian
President
Los Angeles City Council

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

SHELTER AT 545 S. SAN PEDRO STREET (C.F. 22-1545-S21) 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 funding allocation for the shelter/navigation center at 545 S. San Pedro Street, Council District 14.

RECOMMENDATION

Staff recommends that the Council find that the financial transaction to provide funding to the Los Angeles Homeless Services Authority (LAHSA) to contract with an existing shelter/navigation center at 545 S. San Pedro Street for those experiencing homelessness, is statutorily exempt from the California Environmental Quality Act (CEQA) under Government Code Section 65660(b), applicable to City of Los Angeles (City) low barrier navigation centers; and Public Resources Code 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; and Section 15061(b)(3), and Section 15301, applicable to existing facilities, as stated in the Bureau of Engineering report in the Council File, and no unusual circumstances or exceptions exist. Please refer to the attached NOE.

Honorable Paul Krekorian
September 5, 2024
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

TA/JF/MM:

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Attachment

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 (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 14
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PROJECT TITLE: 545 S. San Pedro Street Shelter Funding	LOG REFERENCE CF 22-1545-S21
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PROJECT LOCATION: 545 S. San Pedro Street, in the Central City Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 634-F5.

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The 545 S. San Pedro Street Shelter Funding (Project) consists of a funding allocation for the Los Angeles Homeless Services Authority (LAHSA) to contract with an existing operating shelter for 100 beds in an existing sprung structure. The purpose of the Project is to provide approximately up to three years of emergency shelter and navigation center case management services 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:	<u>GOVERNMENT CODE</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
STATUTORY	65660(b)	15269(c)	21080(b)(4)
GENERAL RULE		15061(b)(3)	21080.10 (c)(1)
CATEGORICAL		15301	

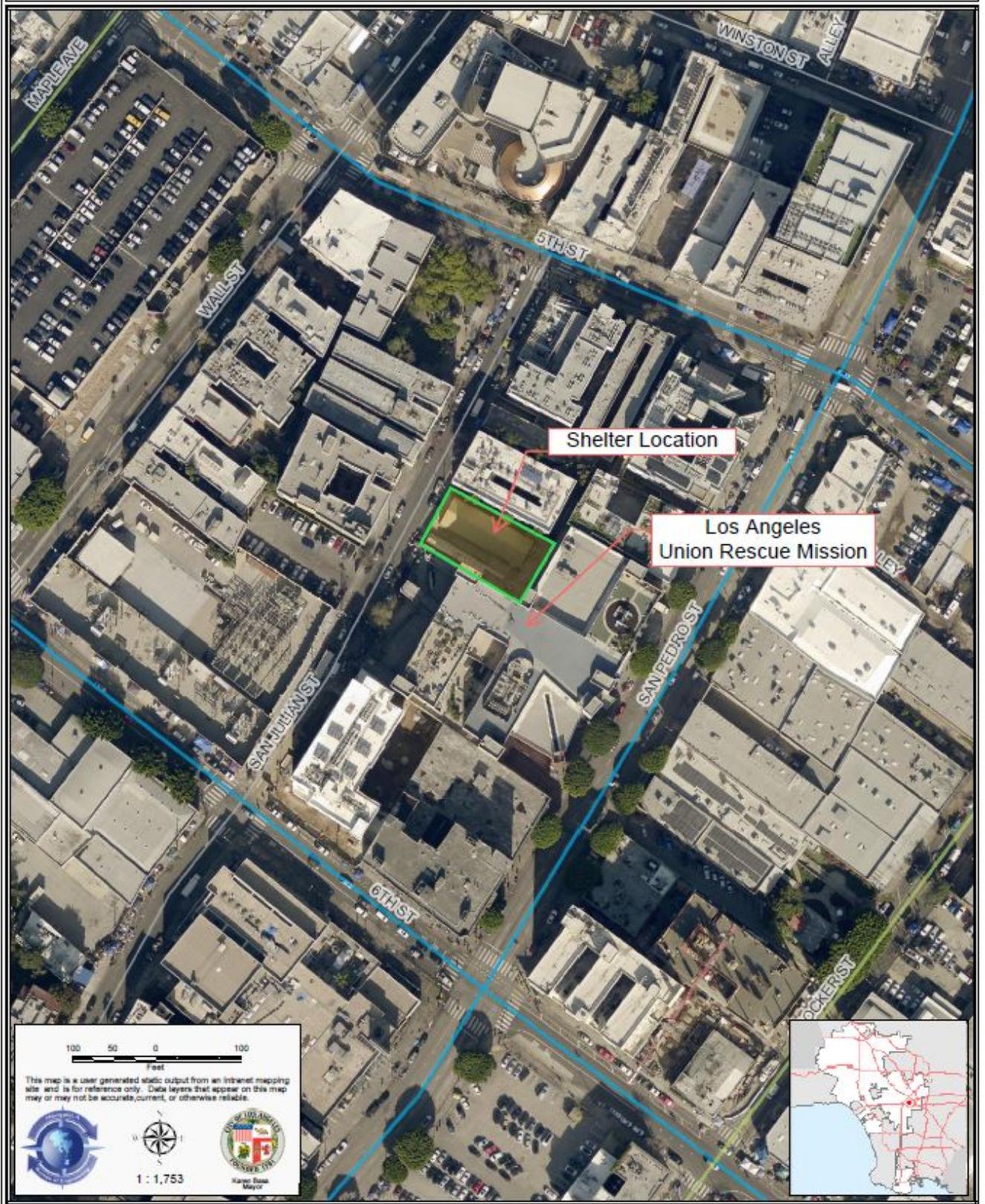
JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Government Code Section 65660(b), applicable to City of Los Angeles (City) low barrier navigation centers; and Public Resources Code (PRC) Section 21080(b)(4); and State CEQA Guidelines, Article 14 of the California Code of Regulations (CCR) Section 15269(c), as specific actions necessary to prevent or mitigate an emergency; and Section 15061(b)(3), and Section 15301, applicable to existing facilities; and PRC 21080.10 (c)(1), for contracts for providing services for people experiencing homelessness; and pending Senate Bill (SB) 1395, that if signed it into law, exempts leasing, providing financial support, constructing, operating, or entering into contracts to provide services to a low barrier navigation center. *None of the limitations set forth in State CEQA Guidelines 15300.2 apply (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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Figure 1: Shelter Location



EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The sprung tent structure has been operating as a shelter with approximately 100 beds since 2019. It is serviced by the existing facility on site. No construction is proposed. Contract includes bed rate and on-site services. Funds will purchase new bed furniture and privacy screens. The shelter will operate as a Low Barrier Navigation Center for the leased beds under its contract with the Los Angeles Homeless Services Authority (LAHSA). The shelter will meet the Scope of Required Services for the Inside Safe-Interim Housing Program. Inside Safe operates with a Housing First, Harm Reduction, Low Barrier, and Trauma-Informed Care approach.

The site will continue to serve adult clients with an intended duration of up to 90-days and the goal of helping the clients identify, apply for, secure and move into permanent housing. The site would include beds, privacy screens and storage for each client. Clients have access to gender separated restrooms, laundry on-site, and three meals a day. They will also receive services like residential monitoring, meals, case management focused on housing navigation with referrals to health and behavioral health and social services as needed.

The shelter is located on two privately-owned rectangular parcels with a total area of approximately 9,900 square feet and developed with an existing sprung tent structure. The parcels' Zoning is [Q]R5-2D with a General Plan "High Medium Residential" land use designation.

The shelter/navigation center facility will be operated consistent with LAHSA's program requirements for bridge shelters, interim housing, low barrier navigation centers, and transitional homeless facilities including, but not limited to the following project requirements as they exist and are updated by 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., the Union Rescue Mission, will operate the Project, and it is anticipated that a contract, or similar operating and/or funding agreement 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 participants are 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 will include 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 facility 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.

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 the 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 storage of possessions is provided in the sprung structure; (2) the presence of partners is allowed as this is a congregate shelter, and (3) privacy to participants is provided with partitions. The presence of pets on the facility is not anticipated. However, the City intends for this Project to otherwise be operated as low barrier navigation centers consistent with Government Code Section 65660.

Funding. The Project includes funding allocation that includes Homelessness Emergency moneys which are General City Purposes funds. The cost of services is anticipated to be eligible for reimbursement from the County. The facility will be publicly funded.

II. CEQA EXEMPTIONS

A. 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 privately-owned 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).

Government Code section 65660(a), 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.”

B. 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.

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).

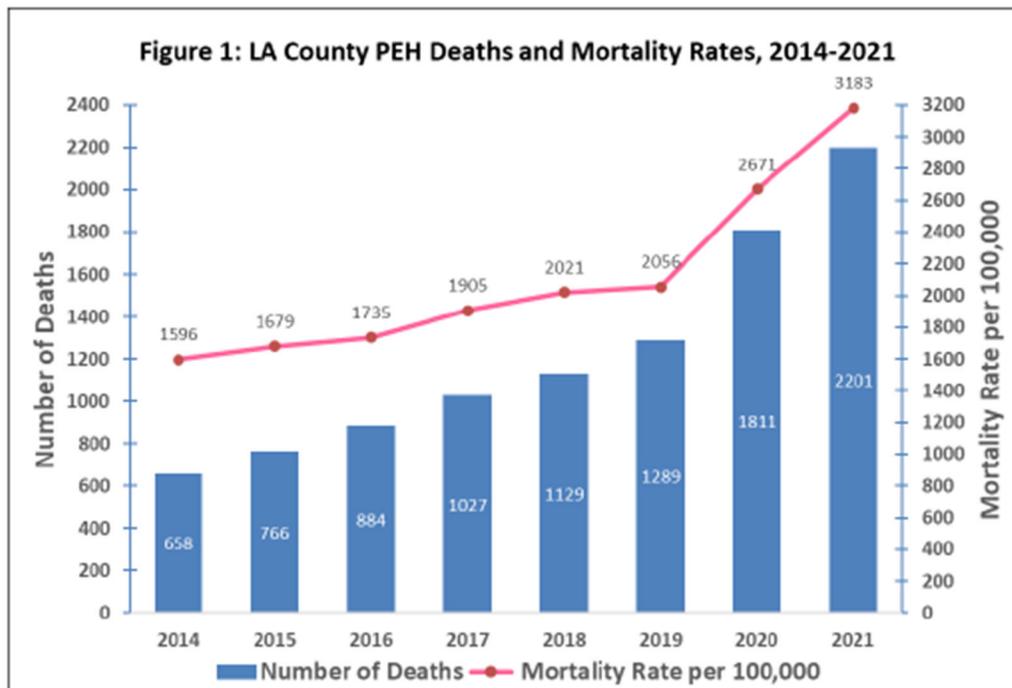
Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated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

LAHSA’s 2024 Homeless Count shows the numbers of sheltered homeless persons increased by 17.7% and the number of unsheltered homeless persons decreased 10.4%, yet the total number of homeless persons decreased only 2.2% when compared to last year (2023) as shown in *Table 7 - 2024 Homeless Count Data Summary* (LAHSA, 2024).

Table 7 2024 Homeless Count Data Summary		
	Number of Individuals	Change from 2023
Sheltered Homeless	15,977	17.7% Increase
Unsheltered Homeless	29,275	10.4% Decrease
Total Homeless Persons	45,252	2.2% Decrease

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.

C. Public Resources Code Section 21080.10(c)(1) (SB 1361, August 19, 2024) (Effective January 1, 2025)

The legislature enacted a statutory CEQA exemption in Public Resources Code Section 21080.10(c)(1) (SB 1361, August 19, 2024), which will be effective on January 1, 2025, for “[a]ctions taken by a local agency to approve a contract for providing services for people experiencing homelessness.” This Project squarely fits this exemption’s requirements, because the project only involves the City’s action approving a contract that will provide funding for services for people experiencing homelessness.

Because this CEQA exemption applies to an action taken by the City to approve or re-approve the Project after January 1, 2025, it applies to moot any argument that the Project is not otherwise exempt from CEQA. Therefore, the City considers this exemption and approves this project on the basis that the project approval will be statutorily exempt from CEQA under this exemption as of January 1, 2025.

D. State CEQA Guidelines, 14 California Code of Regulations (CCR) Section 15301

CEQA Guidelines Section 15300 et. seq. provides for a list of classes of projects which

have been determined not to have a significant effect on the environment and are therefore exempt from the provisions of CEQA, provided the “Exceptions” in Section 15300.2 do not apply. Class 1, Existing facilities “consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.”

The Project fits squarely in this class of exemptions as the shelter is an existing facility that will continue being operated as a shelter, its former use, involving negligible or no expansion of use.

1. Section 15300.2. Exceptions

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

This shelter is exempt under Class 1, therefore this exception does not apply.

- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

No successive projects of the same type and in the same place are anticipated, as this site continues to operate the existing facility, which started operating at the site in 2019. Therefore, this exception does not apply.

- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The activity consists of providing financial support to enter a contract to operate an existing shelter for approximately up to three years and as indicated above, fits squarely into the type of activities determined not to have a significant effect on the environment. Furthermore, providing beds/shelter for people experiencing homelessness has been mandated by a federal judge. Funding such activities is not an unusual circumstance. Thus, there is no reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

- (d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway

officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

545 S. San Pedro Street is not located within a highway officially designated as a state scenic highway per the mapping system of State Scenic Highways per the Streets and Highways Code. Therefore, this exception does not apply.

- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

As of September 4, 2024, the shelter site was not listed as a hazardous waste site. Therefore, Therefore, this exception does not apply.

- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The shelter site is not listed as a historic resource in the City's Historic PlacesLA. The action does not involve any construction or changes to any structures, therefore there is no reasonable possibility that the Project may cause a substantial adverse change in the significance of a historical resource.

E. State CEQA Guidelines, 14 California Code of Regulations (CCR) Section 15061(b)(3)

CEQA Guidelines Section 15061(b)(3) provides that a project is exempt from CEQA if the “[a]ctivity is covered by the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. As described above, the project does not have the potential for causing a significant effect on the environment.

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