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August 1, 2024

The Honorable Paul Krekorian
President
Los Angeles City Council

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

**INTERIM HOUSING AT 600 E. 116TH PLACE AND 503 N. SAN FERNANDO ROAD AND
TINY HOME VILLAGES AT 7724 VAN NUYS BOULEVARD AND 8358 SAN
FERNANDO ROAD (C.F. 23-1022-S6) CALIFORNIA ENVIRONMENTAL QUALITY
ACT (CEQA) NOTICES OF EXEMPTION (NOEs)**

Dear President Krekorian and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the construction, lease, and operation of the residential interim housing/navigation centers at 600 E. 116th Place, Council District 15, and 503 San Fernando Road, Council District 1; and of the Tiny Home Villages/Navigation Centers at 7724 Van Nuys Boulevard, Council District 2, and 8358 San Fernando Road, Council District 6.

RECOMMENDATIONS

Staff recommends that the City Council find that the construction, lease, and operation of the residential interim housing/navigation centers at 600 E. 116th Place and 503 San Fernando Road, and the tiny home villages at 7724 Van Nuys Boulevard and 8358 San Fernando Road, for those experiencing homelessness, are statutorily exempt from the California Environmental Quality Act (CEQA) under Public Resources Code (PRC) Section 21080.27, Government Code Section 65660(b), applicable to the City of Los Angeles low barrier navigation centers; Government Code Section 8698.4, 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. Please refer to the attached NOEs.

Honorable Paul Krekorian
August 1, 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 "Ted Allen".

for

Ted Allen, PE
City Engineer

TA/JF/MM:

Box\EXE_ReadyforSignature\TSA\Outbox\Archived\

Attachment

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

ATTACHMENT

BOE Report for Council File No. 23-1022-S6

CEQA Notice of Exemption for
CD 15 Interim Housing 600 E 116th Pl
and

CEQA Notice of Exemption for
CD 1 Interim Housing 503 N San Fernando Rd
and

CEQA Notice of Exemption for
CD 2 THV Van Nuys Metrolink - 7724 Van Nuys Blvd
and

CEQA Notice of Exemption for
CD 6 THV Sun Valley Metrolink - 8358 San Fernando Rd

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

ATTACHMENT

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

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939, Los Angeles, CA 90015	COUNCIL DISTRICT 15
PROJECT TITLE: CD 15 Interim Housing 600 E 116th PI	LOG REFERENCE C.F. 23-1022-S6

PROJECT LOCATION: 600 E. 116th Place, in the Southeast Los Angeles Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 704 D7 to 704 E7

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 15 Interim Housing 600 E 116th PI project (Project) consists of construction of a new interim housing/navigation center on an existing California Department of Transportation (Caltrans) Park & Ride lot, funding allocation, a lease, and operation for up to approximately three years for 64 people experiencing homelessness. The Project design has changed since the City Council approved the Project on May 31, 2022, from a tiny home village to a residential interim housing layout. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter, low barrier navigation center services, and case management for people experiencing homelessness. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2024, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>GOVERNMENT CODE</u> 65660(b) & 8698.4(a)(4)	<u>STATE CEQA GUIDELINES</u> 15269(c)	<u>CA PUBLIC RESOURCE CODE</u> 21080.27 & 21080(b)(4)
STATUTORY			

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 a specific action necessary to prevent or mitigate an emergency. These determinations are consistent with the Notice of Exemption (NOE) supporting documents in Council File (CF) No. 20-0841-23 and consistent with, and supported by, the City Council's prior actions approving the development and use of this shelter (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

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

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Figure 1: Project Location



EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project will construct residential interim housing on portion of a Caltrans-owned Park & Ride lot, the Avalon Green Line, in furtherance of providing emergency homeless shelter and low barrier navigation services in the City of Los Angeles, as further described in the section below. On May 31, 2022, the City Council found the tiny home village facility proposed for this site to be statutorily exempt (CF No. 20-0841). The documents supporting this determination (CF No. 20-084-S23) are incorporated herein by reference as support for this CEQA determination. The parking lot improvements that were approved as part of the Project on May 31, 2022, have not changed and are not part of this revised approval. However, the tiny home village emergency shelter concept has been modified to a residential interim housing concept as further described below. The Project's main objectives remain the same, to provide emergency shelter, low barrier navigation center services, 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.

The interim housing facility, which includes approximately 64 beds, will be located on a rectangular parcel, approximately 18,900-square-feet, that is currently part of the Avalon Green Line Park & Ride Lot. The parcel is zoned PF with a "Public Facilities" General Plan land use designation. The Project includes up to 16 prefabricated sleeping units that include a bathroom, a kitchenette, two closets, and beds for up to four people. The sleeping units will be surrounded by a continuous deck. The Project also includes administrative units combined with laundry facilities, two administrative offices for counseling, a multi-purpose flexible space, a pet relief and run area, outdoor seating with umbrellas, a six-foot-high perimeter fence that can be equipped with privacy slats, a guard booth, and four parking spaces, including one ADA space. Utility work including potable water, sanitary sewer, and electric service connections will be required. Some street tree trimming is anticipated and removal of up to four trees may be needed, which would be replaced after the facility is removed. Refer to Attachment A for conceptual Project site plans.

The facility will be operated consistent with the applicable Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters, low barrier navigation centers, and interim or 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 will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

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) it is anticipated that participants' pets will be allowed in the facility (2) the storage of possessions is provided in the individual or shared rooms; and (4) privacy to participants is provided in the individual rooms or with partitions. The City intends for this Project to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Funding. The Project includes funding allocation that includes Behavioral Health Continuum Infrastructure Program funds for the construction and operation of the facility. 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 State-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).

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 construction, a lease of State-owned land for a homeless shelter, and 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

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).

- (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

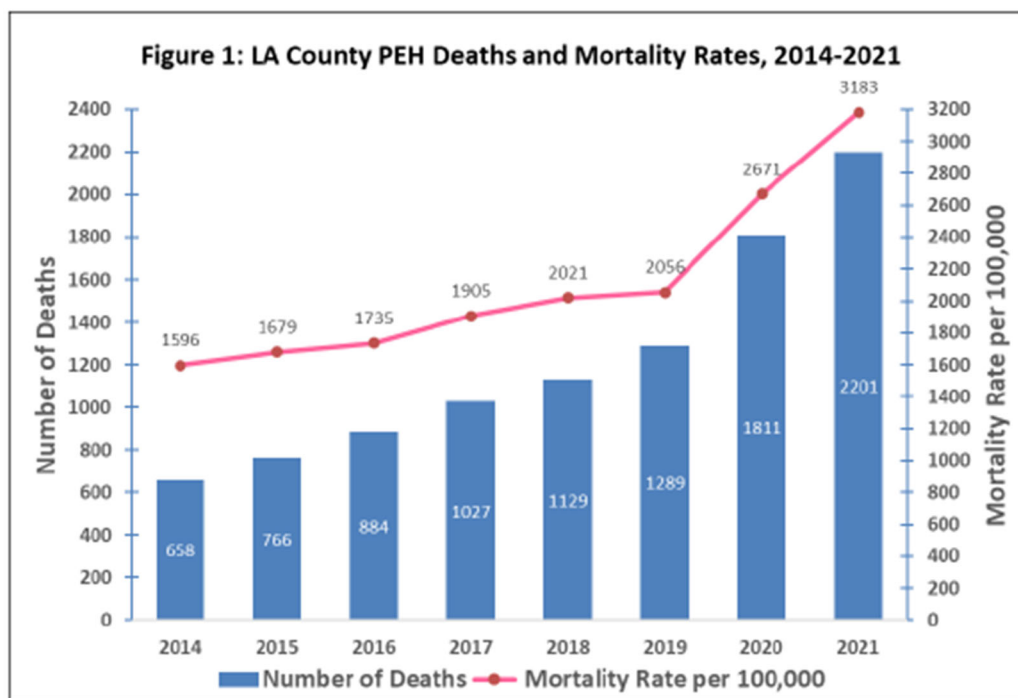
homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as “Part 1 Crimes.”) (Commander Dominic H. Choi, 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 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

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.

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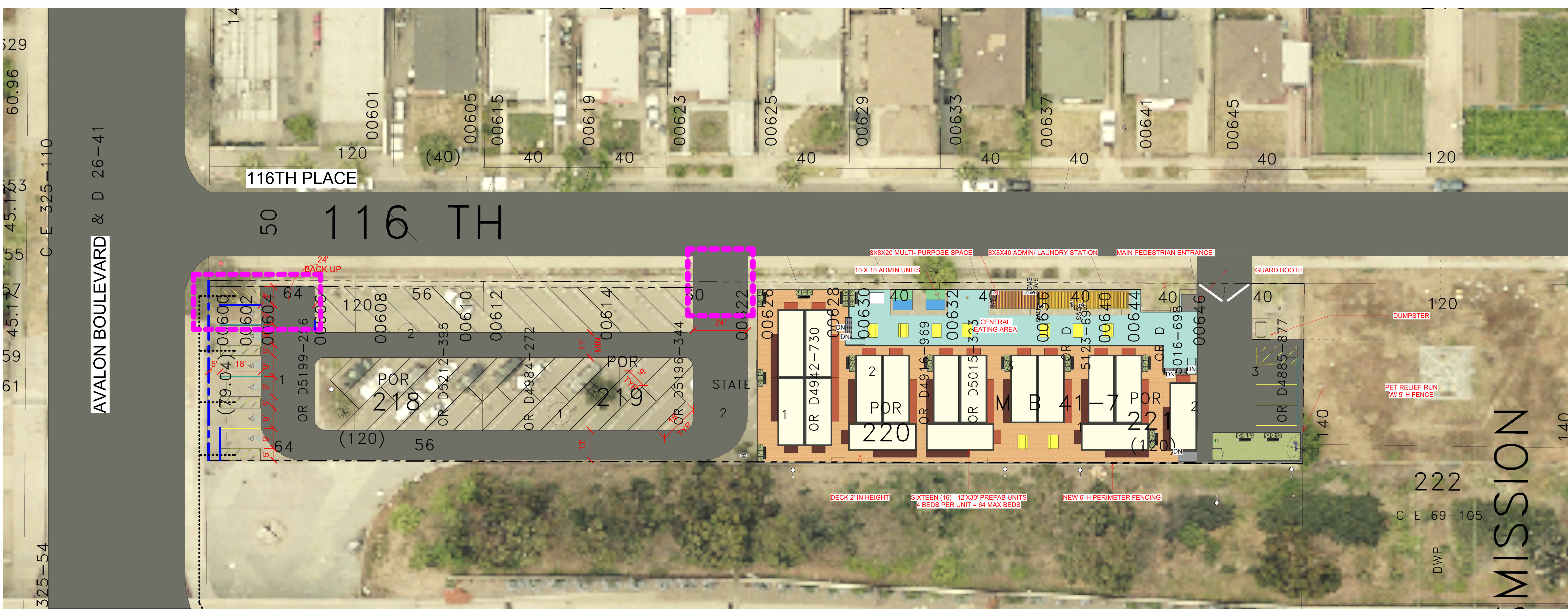
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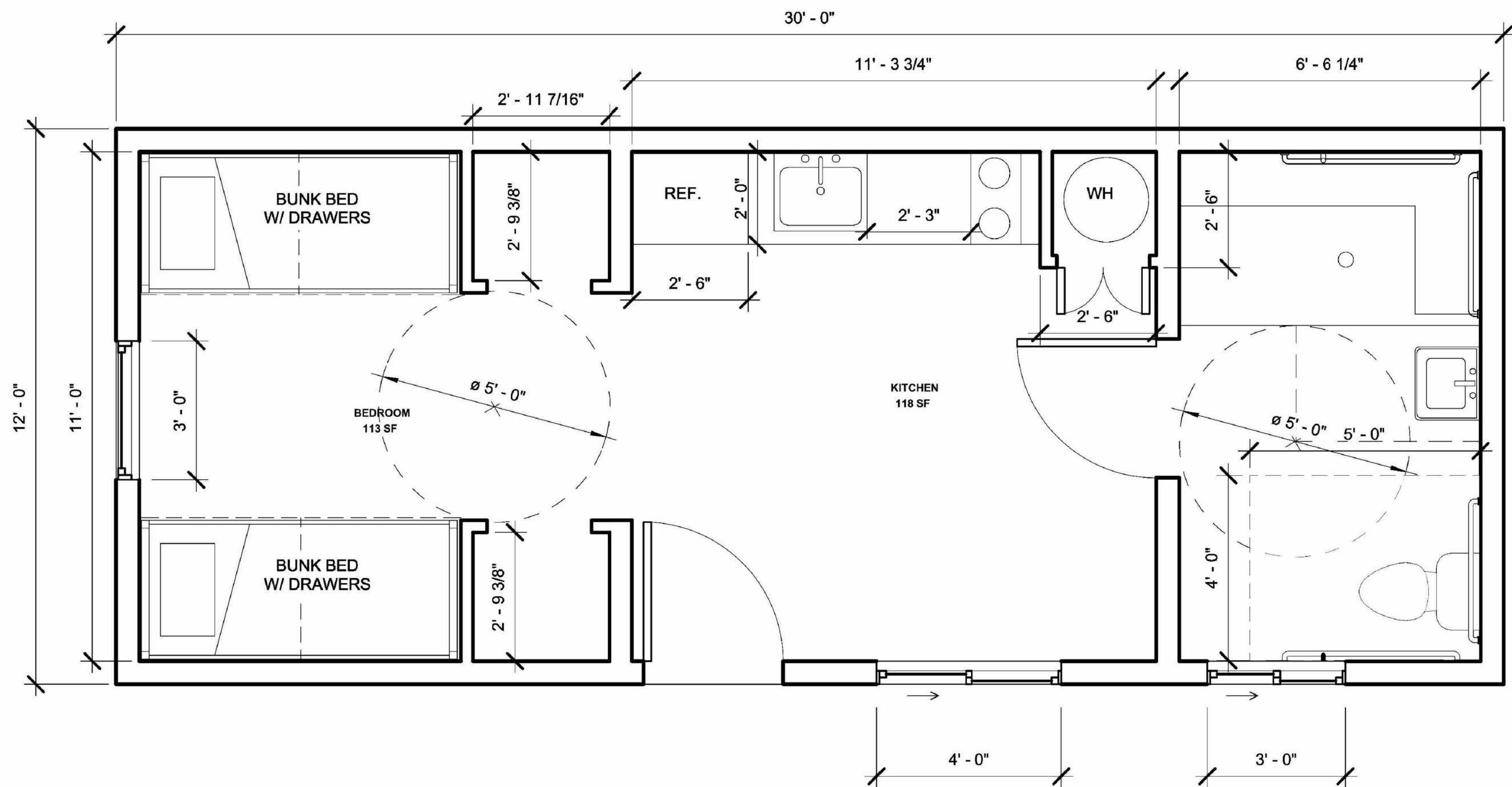
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① Site
3/64" = 1'-0"



TYPICAL PRE-FAB. UNIT FLOOR PLAN
BY MOBILE MODULARS

VICINITY AND SITE DATA

PROJECT SCOPE

THE PROJECT WILL PROVIDE UP TO 16 PRE- FAB. MODULAR UNITS WHICH WILL HOUSE UP TO 64 PEOPLE.

SITE AMENITIES INCLUDE PRE-FAB. SLEEPING UNITS EQUIPPED WITH A BATHROOM, A KITCHENETTE, TWO CLOSETS, AND BEDS FOR UP TO FOUR PEOPLE; SLEEPING UNITS WILL BE SURROUNDED BY A CONTINUOUS DECK; LAUNDRY FACILITIES ON SITE WITH COMBINED ADMIN UNITS; A MULTI- PURPOSE FLEXIBLE SPACE; A PET RELIEF AND RUN AREA; ON- SITE SECURITY; OUTDOOR SEATING WITH MOBILE UMBRELLAS; AND TWO ADDITIONAL ADMIN OFFICES FOR COUNSELING. THE SITE PERIMETER WILL BE SECURED WITH 6' HIGH FENCING THAT CAN BE EQUIPPED WITH PRIVACY SLATS.

COMPONENTS BREAKDOWN: WEST SITE

- 18,185 SF TOTAL SITE AREA
- 16 PRE- FAB. UNITS MAX., 64 BEDS

AMENITIES

- 1 - 8X40' ADMIN- LAUNDRY STATION W/ SERVICE SINK
- 1 - 8X20' MULTI- PURPOSE FLEXIBLE SPACE
- 2 - 10X10' ADMIN COUNSELING UNITS
- 1 - GUARD BOOTH
- 1 - PET RELIEF AREA (481 SF)
- 9 - OUTDOOR TABLES WITH UMBRELLAS
- 3 - PARKING STALLS (1 ADA)

FENCING AND DECKING

- FENCING 615 LF, DECKING 4,828 SF

NUMBER OF TREES REQUIRED TO REMOVE: 4 TREES

UTILITIES

ELECTRICAL:

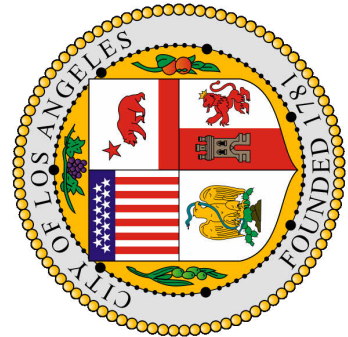
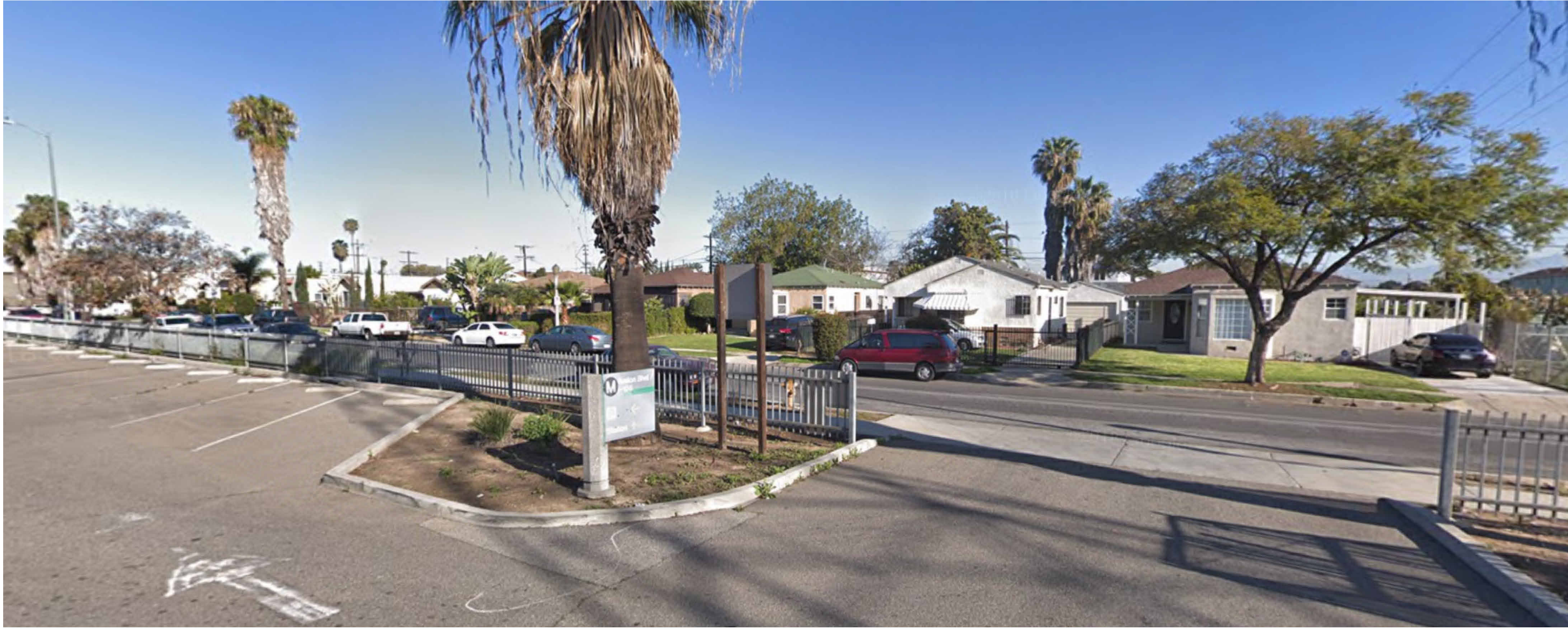
800A @480/277, 3 PHASE, 4 WIRE, UNDERGROUND ELECTRIC SERVICE FROM AVALON BOULEVARD.

WATER:

(E) 8" WATER MAIN ON E 116TH PLACE (N)2" DOMESTIC WATER METER INSTALLED BY LADWP; APPROXIMATELY (N) 300 FT OF 2" DOMESTIC WATER LINE WITHIN THE PROPERTY LINE.

SEWER:

(E) 8" SEWER MAIN (PIPE ID: 5810205058102051A) ON E 116TH PLACE ; APPROXIMATELY (N) 40 FT OF 6" HOUSE CONNECTION LINE TO THE PROPERTY LINE. APPROXIMATELY (N) 280 FT OF 4" SANITARY SEWER LINE WITHIN THE PROPERTY LINE.



CD 15 RESIDENTIAL INTERIM HOUSING

600 E. 116TH PLACE, LA, CA 90059

SITE PHOTOS

ENGINEERING

CITY OF LOS ANGELES

COUNCIL DISTRICT:	15	A103
DATE:	3/13/2024	RH
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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 1
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PROJECT TITLE: CD 1 Interim Housing 503 N San Fernando Rd	LOG REFERENCE CF 23-1022-S6
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PROJECT LOCATION: 503 N. San Fernando Road, in the Northeast Los Angeles Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 594-H6, H7, J6, J7

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 1 Interim Housing 503 N San Fernando Rd project (Project) consists of funding allocation, construction, a lease for approximately three years, and operation of an interim housing/navigation center facility in furtherance of providing emergency interim housing/navigation center services in the City. A third-party service provider, yet to be determined, 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 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)

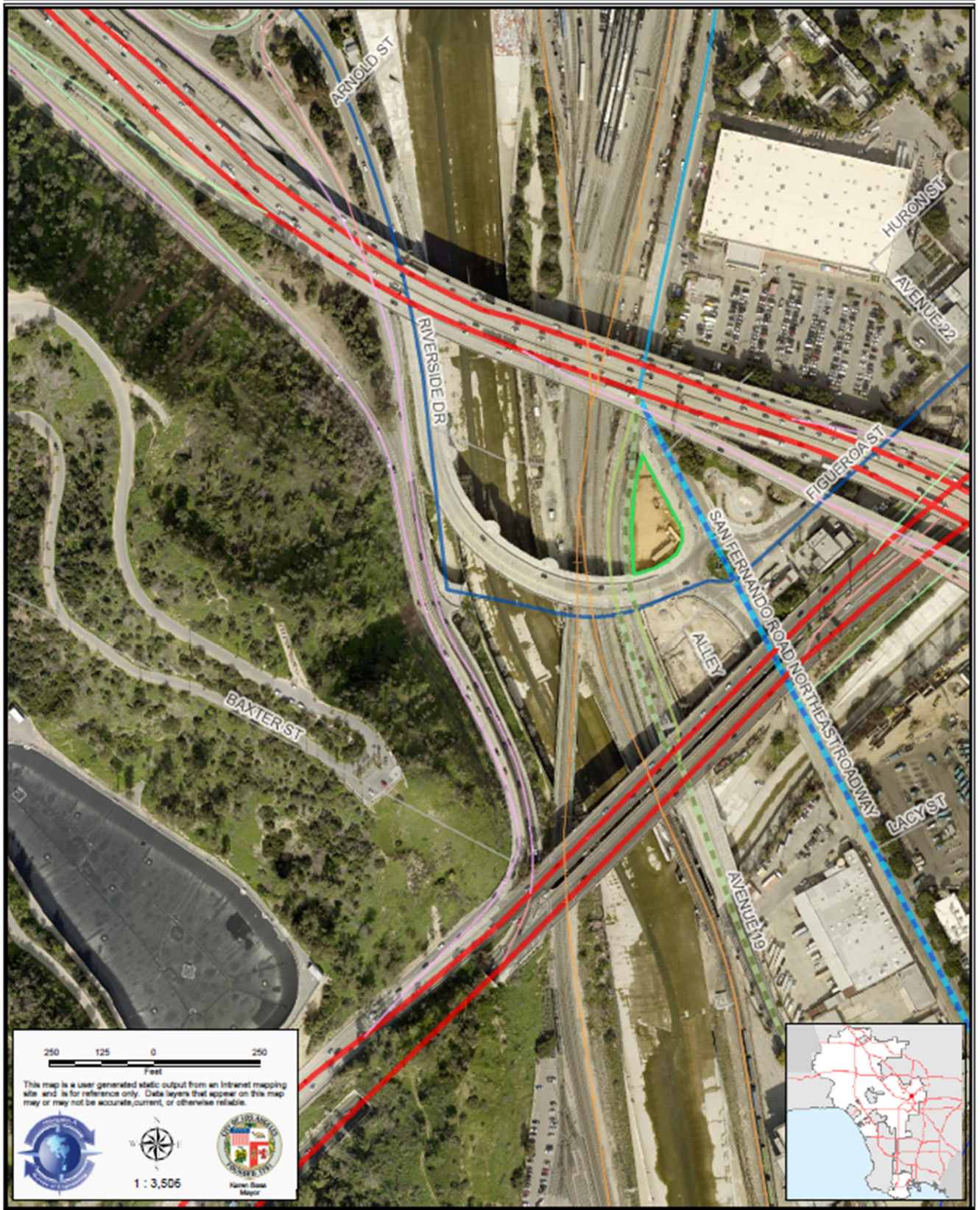
JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under PRC Section 21080.27 and Government Code Section 65660(b), applicable to City low barrier navigation centers, Government Code Section 8698.4(a)(4), governing homeless shelter projects under a shelter crisis declaration, 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. (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 funding allocation, construction, lease, and operation of an interim housing/navigation center facility in furtherance of providing emergency interim housing/navigation center in the City at the City-owned property at 503 N. San Fernando Road. The final funding allocation will be determined when plans have been finalized.

The interim housing facility, which includes approximately 48 beds, will be located on an irregularly shaped parcel, approximately 21,000-square-feet, that is currently undeveloped. The parcel is zoned GW(CA) with a “Open Space” General Plan land use designation. The interim housing facility includes up to 16 prefabricated modular units that include a bathroom, closets, beds for up to three people, and continuous decking surrounding the units; administrative units combined with laundry facilities, two administrative offices for counseling, a pet relief and run area, outdoor seating with umbrellas, an 8-foot high perimeter fence with privacy slats, a guard booth, a 20-foot fire access road, and potentially a new fire hydrant. Utility work including electrical, water, and sewer will be needed to provide service to the facility.

The conceptual site plan (see Attachment), which is subject to further refinement, includes the following amenities (with anticipated sizes, if available):

- 16 prefabricated sleeping units
- One 8 X 40-foot administrative & laundry station
- Two administrative units for counseling services
- One guard booth
- Seven outdoor tables with chairs and umbrellas
- Three parking stalls, including one ADA accessible
- 3,290 square feet of decking
- 620 linear feet of fencing
- Pet relief area

The Project will be funded using Behavioral Health Continuum Infrastructure Program funds (California Code, Welfare and Institutions Code - WIC Section 5960). The final funding allocation will be determined when the plans are finalized.

The facility will be operated consistent with the applicable Los Angeles Homeless Services Authority’s (LAHSA) program requirements for bridge shelters, low barrier navigation centers, and interim or 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, will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

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) it is anticipated that participants' pets will be allowed in the facility (2) the storage of possessions is provided in the individual or shared rooms; and (4) privacy to participants is provided in the individual rooms or with partitions. The City intends for this Project to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Funding. The Project includes funding allocation that includes Behavioral Health Continuum Infrastructure Program funds for the construction and operation of the facility. 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 City-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).

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 construction, a lease of City-owned land for a homeless shelter, and 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:

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).

- (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 Zabalski, 2019). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as Emergency Room (ER) visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

Los Angeles County’s Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Wu, 2016). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated

with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

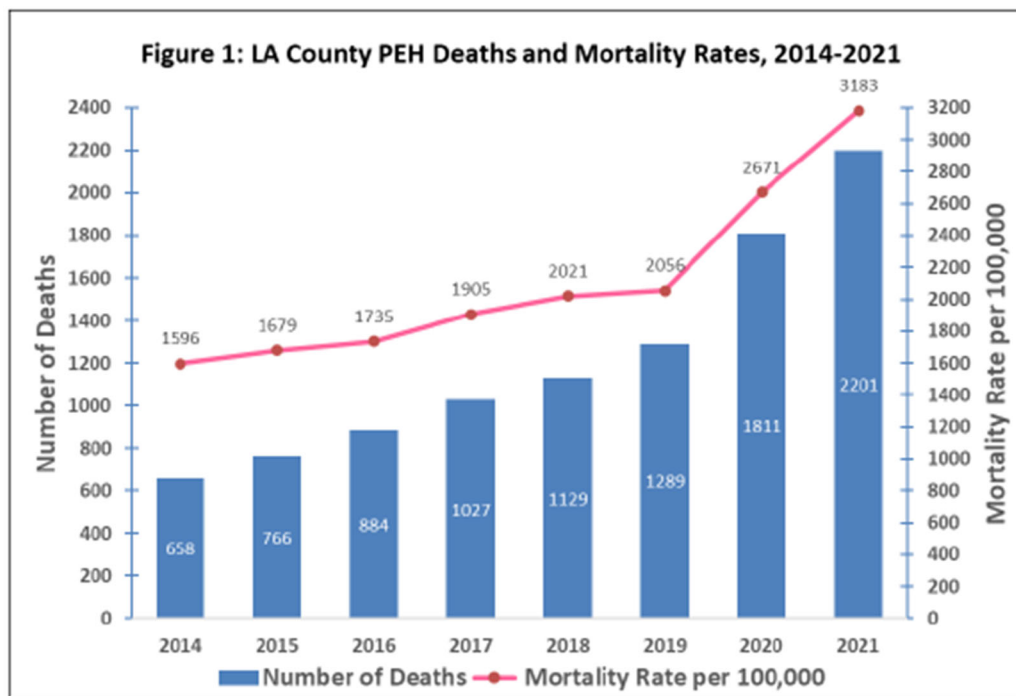
Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated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

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (Commander Dominic H. Choi, 2019). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*). According to the LAPD Use of Force Year-End Report in 2020, among the 41,290 estimated homeless individuals throughout the City, 7,872 persons were reported to be victims of a violent or property crime. In the same year, 5,722 persons experiencing homelessness were reported as suspects of a violent or property crime (LAPD, 2020). On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner’s showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County’s Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality

rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

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



(Source: LA County DPH May 2023.)

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

These significant adverse health impacts suffered by the homeless in the City and County

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

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

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

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

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

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 is sheltered population increased 8.7 percent, its unsheltered population only decreased 1.37 percent, as shown *Table 5 - 2022 Homeless Count Data Summary* (LAHSA, 2022).

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

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

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

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.

III. REFERENCES

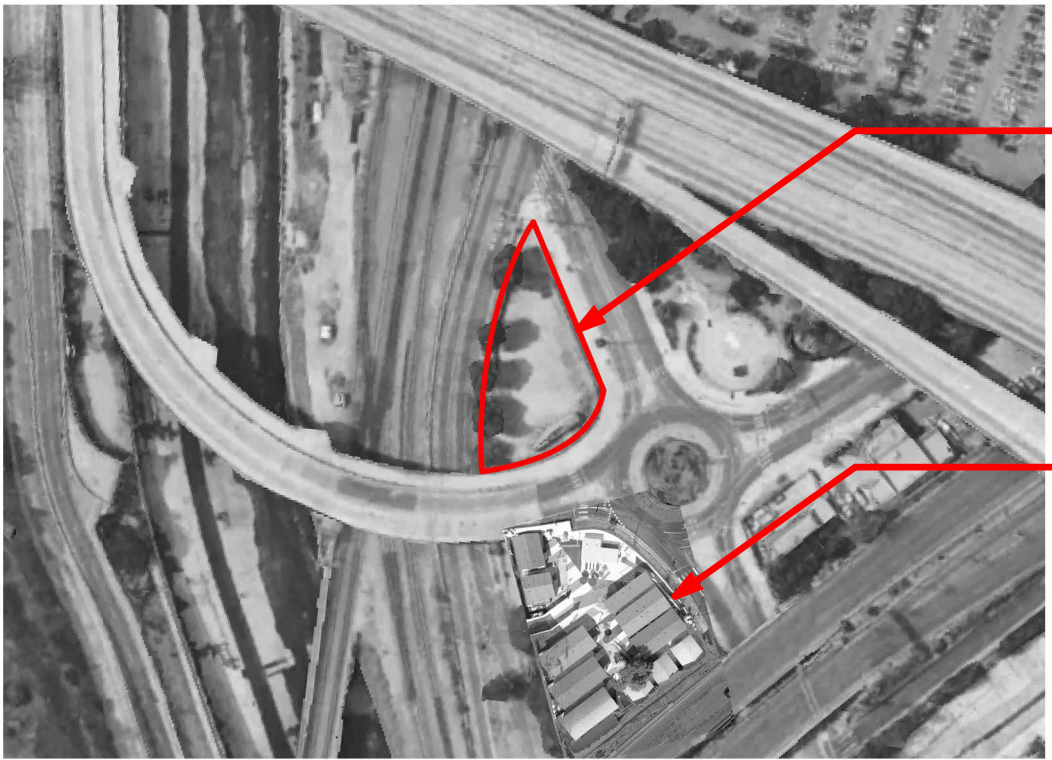
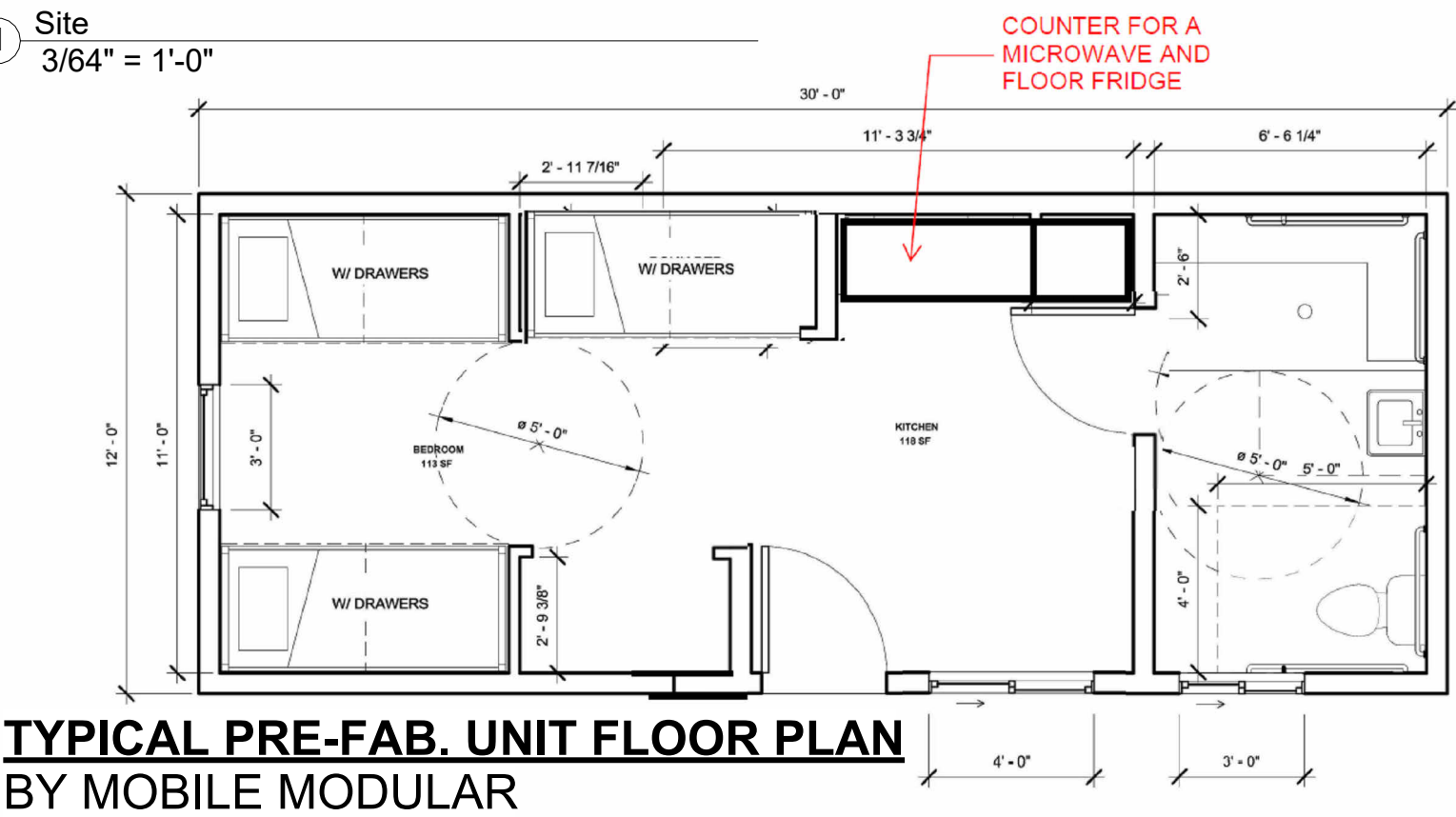
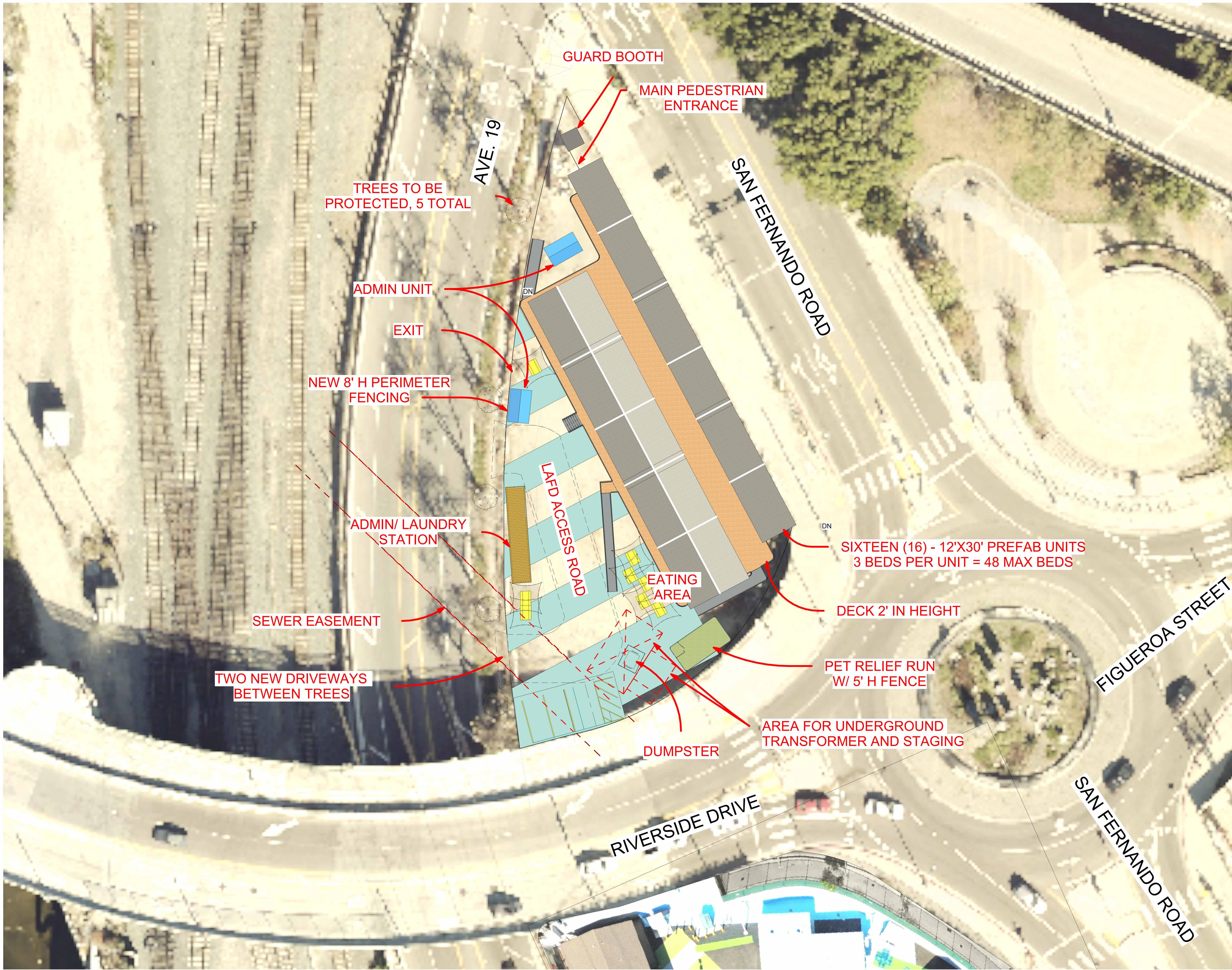
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PROPOSED SITE
AT 503 N. SAN
FERNANDO RD.

RECENTLY
COMPLETED NE
NEW BEGINNINGS
SITE AT 499 N. SAN
FERNANDO RD.

SITE CONTEXT

STORM DRAINS:

1. THERE ARE NO EVIDENT STORM DRAINS ON SITE. CIVIL TO INCLUDE TWO CATCH BASINS.

GEOTECH:

1. SITE WILL REQUIRE SOILS INVESTIGATION TO CONFIRM DEPTH OF UNCERTIFIED FILL

SEWER EASEMENT:

1. NO STRUCTURES TO BE BUILT OVER THE EXISTING SEWER EASEMENT.

VICINITY AND SITE DATA

PROJECT SCOPE:

THE PROJECT WILL PROVIDE UP TO 16 PRE- FAB. MODULAR UNITS WHICH WILL HOUSE UP TO 48 PEOPLE.
THE PROJECT AREA IS APPROXIMATELY 21,000 SF WITHIN A CITY-OWNED LOT THAT IS FREEWAY AND RAILROAD TRACK ADJACENT, WITH MOSTLY COMMERICAL SURROUNDINGS, AND THE ARROYO SECO AND LA RIVER NEARBY. THE MAIN DRIVEWAY ENTRANCE WILL BE FROM AVENUE 19 WITH A 20' ROAD WITH TURNAROUND FOR LAFD ACCESS. THE DRIVEWAYS WILL BE BUILT BETWEEN EXISTING STREET TREES.
SITE AMENITIES INCLUDE PRE-FAB. SLEEPING UNITS EQUIPPED WITH A BATHROOM, A COUNTER WITH MICROWAVE, CLOSETS, AND BEDS FOR UP TO THREE PEOPLE; SLEEPING UNITS WILL BE SURROUNDED BY A CONTINUOUS DECK; LAUNDRY FACILITIES ON SITE WITH COMBINED ADMIN UNITS; A PET RELIEF AND RUN AREA; ON- SITE SECURITY; OUTDOOR SEATING WITH MOBILE UMBRELLAS; AND TWO ADDITIONAL ADMIN OFFICES FOR COUNSELING. THE SITE PERIMETER WILL BE SECURED WITH 8' HIGH FENCING THAT CAN BE EQUIPPED WITH PRIVACY SLATS.

COMPONENTS BREAKDOWN:

- APPROX. 21,000 SF TOTAL SITE AREA
- 16 PRE- FAB. UNITS MAX., 48 BEDS

AMENITIES:

- 1 - 8X40' ADMIN- LAUNDRY STATION
- 2 - ADMIN COUNSELING UNITS
- 1 - GUARD BOOTH
- 1 - PET RELIEF AREA (280 SF)
- 7 - OUTDOOR TABLES WITH UMBRELLAS
- 3 - PARKING STALLS (1 ADA)

FENCING AND DECKING:

- FENCING 620 LF
- DECKING 3,290 SF

ACCESSIBILITY:

- AN EXISTING ACCESSIBLE WALKWAY IS AVAILABLE ALONG N SAN FERNANDO ROAD

UTILITIES

ELECTRICAL:

1. THE SITE IS IN A METHANE BUFFER ZONE
2. AMCO RESIDENTIAL UNITS
3. UNDERGROUND ELECTRIC SERVICE WITH LADWP TRANSFORMER: 2500A @120/240V, SINGLE PHASE UNDERGROUND ELECTRIC SERVICE

DOMESTIC AND FIRE PROTECTION WATER:

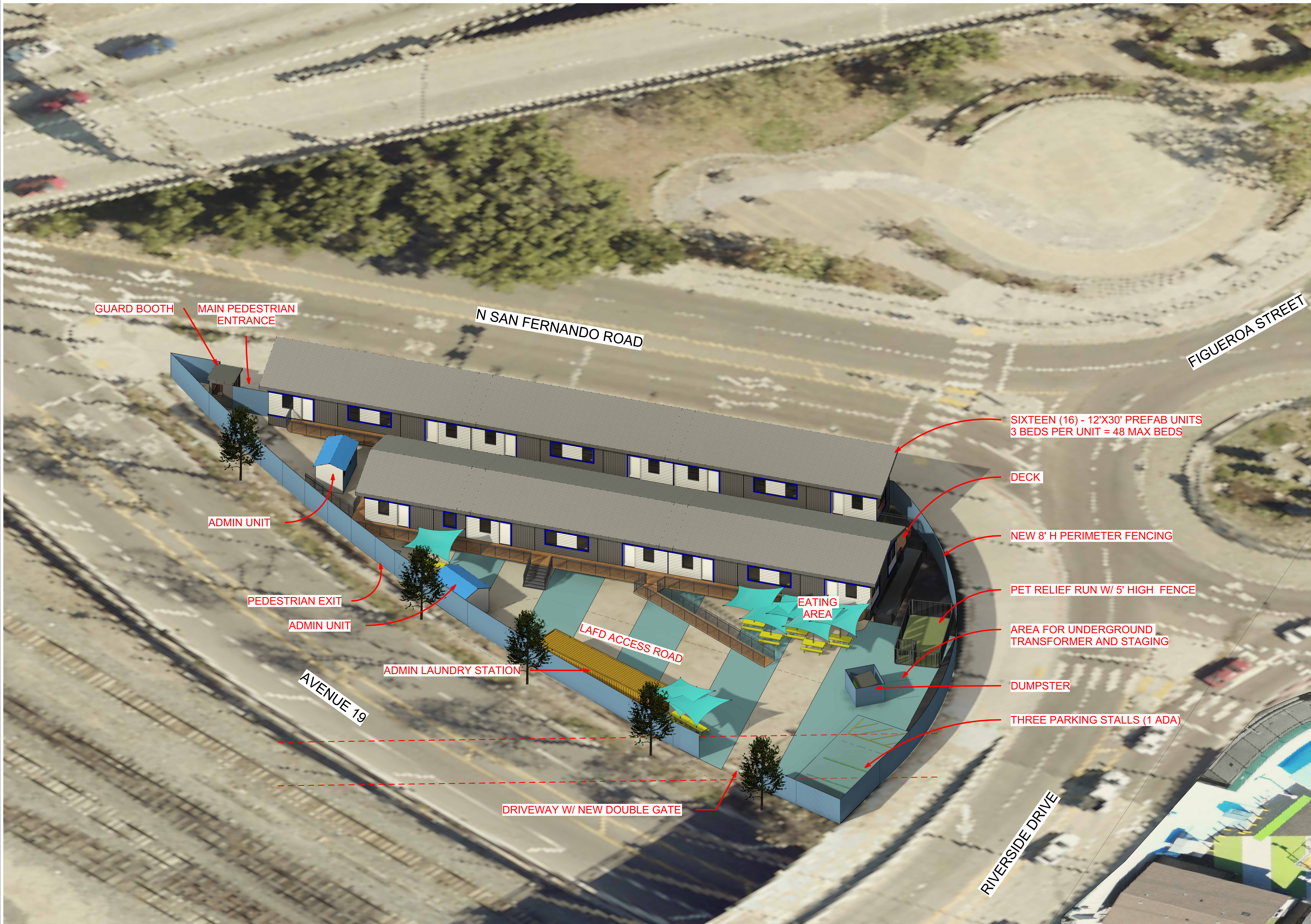
1. 8" WATER MAIN IN N.SAN FERNANDO ROAD. 2" DOMESTIC AND 4" FIRE COMBO METER INSTALLED BY LADWP.
2. APPROX. 220 FT OF 2" DOMESTIC WATER LINE WITHIN THE PROPERTY LINE.
3. APPROX. 180 FT OF 3" FIRE PROTECTION LINE WITHIN THE PROPERTY LINE.

SANITARY SEWER:

1. 8" SANITARY SEWER MAIN (PIPE ID: 4950507349505078A) IN N SAN FERNANDO ROAD.
2. APPROX. 50 FT OF 6" HOUSE CONNECTION TO THE PROPERTY.
3. APPROX. 250FT OF 4" SANITARY SEWER LINE WITHIN THE PROPERTY LINE.

FIRE DEPARTMENT REQUIREMENTS:

1. SITE WILL REQUIRE A NEW FIRE HYDRANT - VERIFY WITH LAFD.
2. NEW 20' LAFD FIRE ACCESS ROAD



ENGINEERING
CITY OF LOS ANGELES

AXON VIEW OF SITE

COUNCIL DISTRICT: 1
DATE: 4/12/2024
DRAWN BY: RH
CHECKED BY: MQ

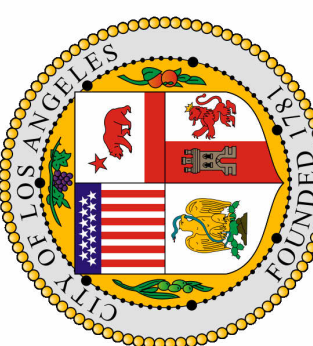
A102

Scale:

CITY ENGINEER

CD 1 RESIDENTIAL INTERIM HOUSING

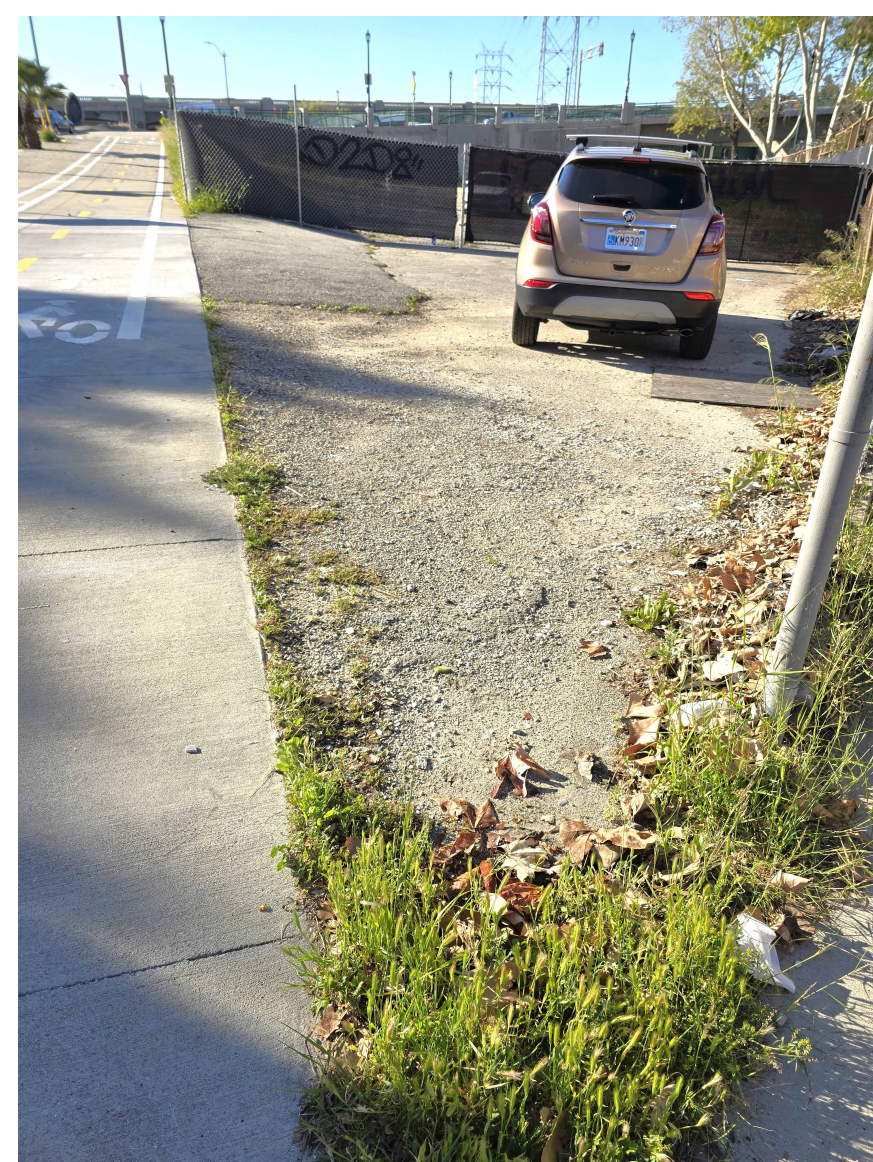
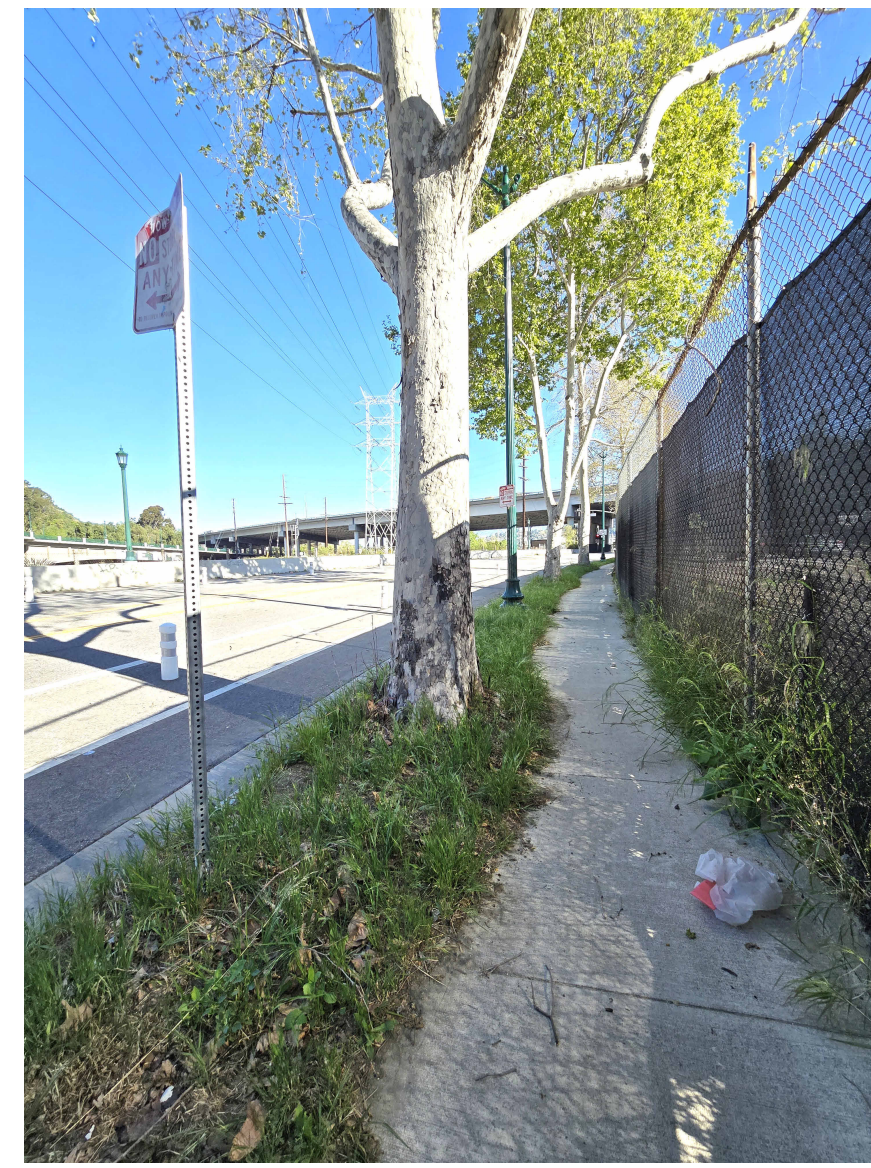
503 N. SAN FERNANDO RD.
LOS ANGELES, CA 90031


SHELTER AND HOUSING PROGRAM

CITY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

BUREAU OF ENGINEERING



SITE PHOTOS

PHOTOS TAKEN ON APRIL 3, 2024 AT 503 N. SAN FERNANDO ROAD AND SURROUNDINGS

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)**

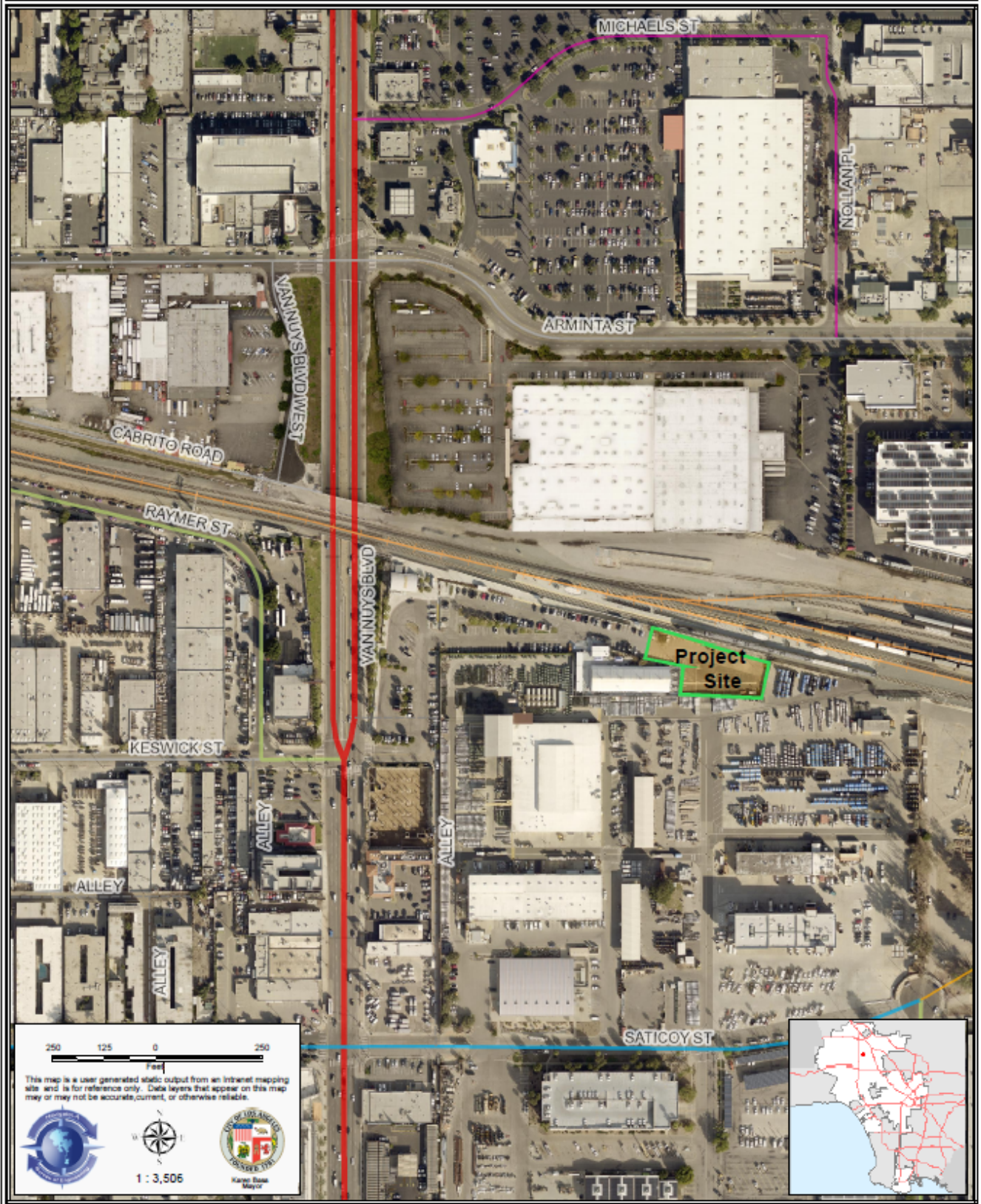
Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Planning and Research pursuant to PRC Section 21080.27(c), when applicable; 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 2	
PROJECT TITLE: CD 2 THV Van Nuys Metrolink - 7724 Van Nuys Blvd		LOG REFERENCE CF 23-1022-S6	
PROJECT LOCATION: 7724 Van Nuys Boulevard, in the Van Nuys - North Sherman Oaks Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 532-A3			
DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 2 THV Van Nuys Metrolink - 7724 Van Nuys Blvd project (Project) consists of funding allocation, construction, a new lease for approximately three years, and operation of a tiny home village (THV) in furtherance of providing emergency interim housing/navigation center services in the City. A third-party service provider, yet to be determined, 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 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	
EXEMPT STATUS:			
STATUTORY	GOVERNMENT <u>CODE</u> 65660(b) & 8698.4(a)(4)	STATE CEQA <u>GUIDELINES</u> 15269(c)	CA PUBLIC <u>RESOURCE CODE</u> 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. (see attached narrative).			
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING			
SIGNATURE: <i>Pending project approval.</i> <div style="text-align: right;">Maria Martin</div>		TITLE: Environmental Affairs Officer BOE Environmental Management Group	
RECEIPT NO.		REC'D BY	
DATE		DATE	

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

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Figure 1: Project Location



EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project consists of funding allocation, construction, a new lease, and operation of a tiny home village in furtherance of providing emergency interim housing/navigation center in the City at the City-owned property at 7724 Van Nuys Boulevard. The final funding allocation will be determined when plans have been finalized.

The tiny home village, which includes approximately 100 beds, will be located on an irregularly shaped lot (approximately 26, 571-square-foot) that is currently developed with the existing Van Nuys Metrolink Station surface parking and an existing bridge home facility. The parcel is zoned [Q]C2-1VL-CDO with a “General Commercial” General Plan land use designation. The tiny home village includes sleeping units, hygiene, and administrative structures, staff parking spaces, an outdoor seating area with tables and umbrellas, lockers, storage bins, perimeter fencing, and a pet relief area. Utility work including electrical, water, and sewer will be needed to provide service to the facility.

The conceptual site plan (see Attachment), which is subject to further refinement, includes the following amenities (with anticipated sizes if available):

- 40 8 X 8-foot double occupancy sleeping units,
- Ten 10 X 10-foot double occupancy sleeping units (five ADA),
- Three double standard hygiene units,
- Two single ADA hygiene units,
- One 8 X 40-foot administrative - laundry station with service sink,
- Two administrative cabins,
- One guard booth,
- 50 amnesty lockers,
- 100 storage bins,
- Eight outdoor tables with chairs and umbrellas,
- Three parking stalls, including one ADA accessible
- 400 linear feet of fencing,
- Shared pet relief area.

The Project will be funded using Behavioral Health Continuum Infrastructure Program funds (California Code, Welfare and Institutions Code - WIC Section 5960). The final funding allocation will be determined when the plans are finalized.

The facility will be operated consistent with the applicable Los Angeles Homeless Services Authority’s (LAHSA) program requirements for bridge shelters, low barrier navigation centers, and interim or 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, , will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

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) it is anticipated that participants' pets will be allowed in the facility (2) the storage of possessions is provided in the individual or shared rooms; and (4) privacy to participants is provided in the individual rooms or with partitions. The City intends for this Project to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Funding. The Project includes funding allocation that includes Behavioral Health Continuum Infrastructure Program funds for the operation of the facility. 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 City-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).

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 construction, a lease of City-owned land for a homeless shelter, and the 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

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).

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).

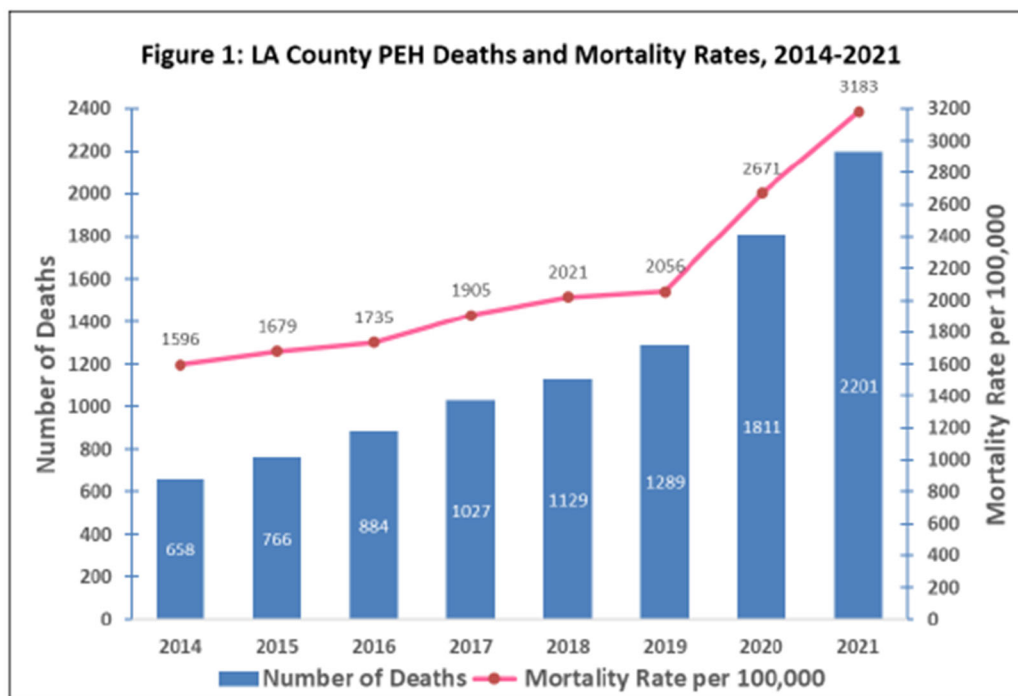
Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated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

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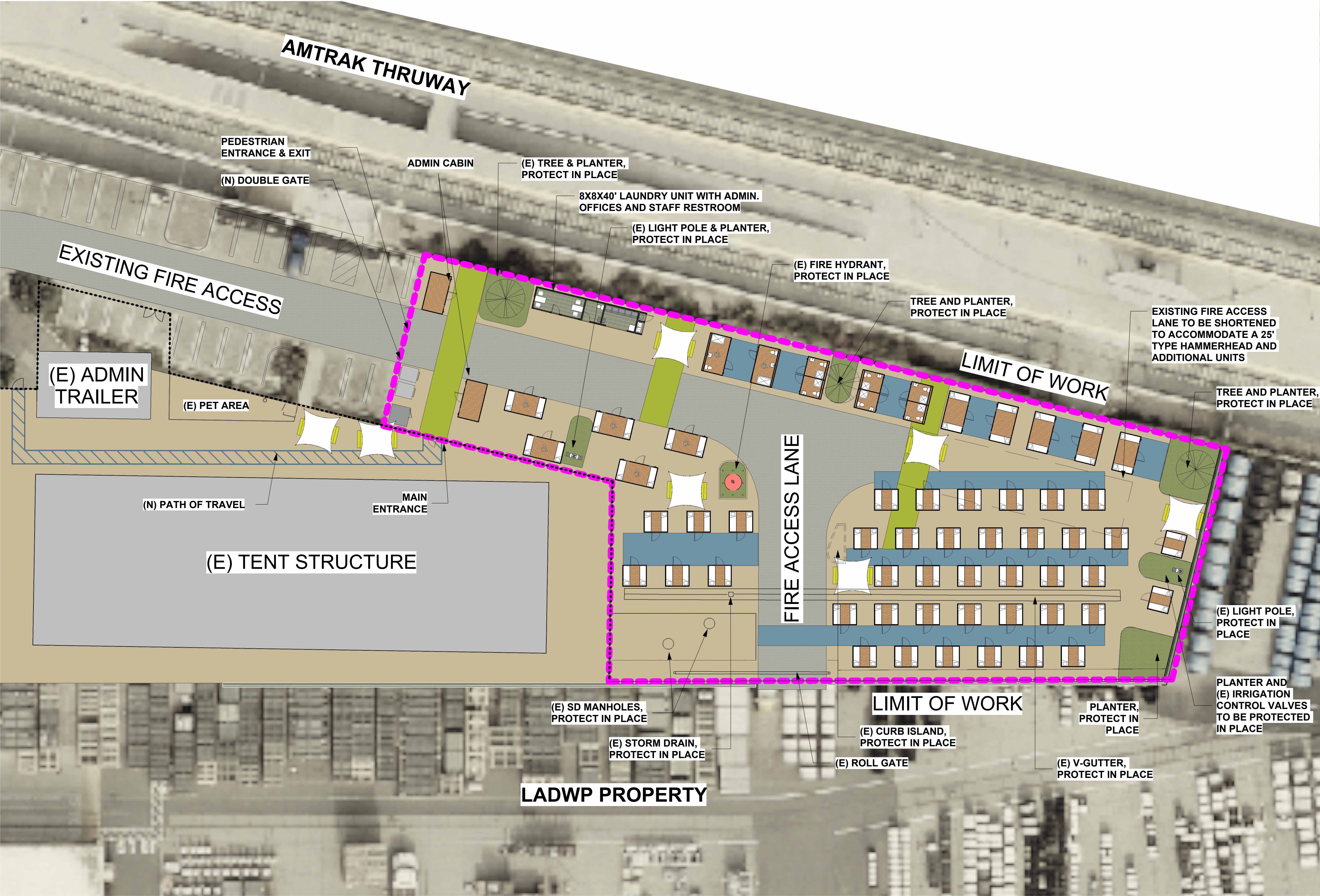
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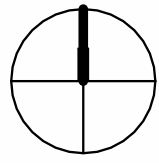
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VICINITY PLAN
1" = 20'-0"



CD2 VAN NUYS METROLINK STATION
TINY HOME VILLAGE PROJECT

PROJECT SCOPE:
NEW SHELTER AND HOMELESS PROJECT TO PROVIDE BEDS WITHIN EMERGENCY SLEEPING CABINS FOR 100 INDIVIDUALS.

THE IMPROVED PROJECT AREA IS APPROXIMATELY 26,571 SF WITHIN AN EXISTING PARKING LOT.

SITE AMENITIES INCLUDE FIVE (5) HYGIENE PALLET UNITS WITH RESTROOMS, SHOWERS, AND LAVATORIES; SEATING AREAS WITH SHADE UMBRELLAS FOR FOOD DISTRIBUTION SERVICES; ADMINISTRATIVE USE PALLET UNIT WITH LAUNDRY AMENITIES; AMNESTY LOCKERS AREA; GUARD BOOTH; SHARED PET AREA, AND STAFF PARKING. SITE PERIMETER TO BE FENCED, 8' HIGH, WITH PRIVACY SLATS.

THE ACCESSIBLE PATH OF TRAVEL FROM THE SITE SHALL EXTEND AND CONNECT WITH PATH OF TRAVEL FROM THE ADJACENT "A BRIDGE HOME" SITE FOR ACCESS TO THE PUBLIC RIGHT-OF-WAY.

- NOTE:
1. CONCEPTUAL LAYOUT ONLY. REQUIRE SITE SURVEY FOR AN ACCURATE LAYOUT.
 2. LAYOUT SHALL FOLLOW ALL PREVIOUSLY APPROVED LAFD REQUIREMENTS FOR FIRE ACCESS.
 3. COORDINATION REQUIRED AT ALL PERIMETER WALLS FOR TRENCHING.
 4. THE SITE IS NOT IN A FLOOD HAZARD ZONE, HILLSIDE GRADING AREA, EARTHQUAKE-INDUCED LANDSLIDE AREA, EARTHQUAKE-INDUCED LIQUEFACTION AREA, METHANE HAZARD SITE, OR HIGH WIND AREA.

- COMPONENTS BREAKDOWN:**
- 25,780 SF TOTAL SITE AREA
 - 50 PRE-FAB. UNITS MAX., 100 BEDS

- AMENITIES**
- 40 - 8x8' DOUBLE OCCUPANCY SLEEPING UNITS
 - 10 - 10x10' DOUBLE OCCUPANCY SLEEPING UNITS (5 ADA)
 - 3 - PARKING STALLS (1 ADA)
 - 1 - GUARD BOOTH
 - 50 - AMNESTY LOCKERS
 - 2 - ADMIN CABIN
 - 1 - 8x40' ADMIN - LAUNDRY STATION W/ SERVICE SINK
 - 3 - DOUBLE STANDARD HYGIENE UNIT
 - 2 - SINGLE ADA HYGIENE UNITS
 - 8 - OUTDOOR TABLES W/ UMBRELLAS
 - 100 - STORAGE BINS
 - SHARED PET RELIEF AREA

FENCING: 403 LF

NUMBER OF TREES REQUIRED TO REMOVE: 0 TREES

NUMBER OF PARKING STALLS TO REMOVE: 66 STALLS

NUMBER OF EXISTING LIGHT POLES: 2

NUMBER OF EXISTING FIRE HYDRANTS: 1

- UTILITIES**
- ELECTRICAL:**
1. THE SITE WILL REQUIRE A NEW 1000A @120/240V, SINGLE PHASE, THREE WIRE, UNDERGROUND ELECTRIC SERVICE. TRENCH 550 FEET FROM THE PROJECT SITE TO THE EXISTING TRANSFORMER.

- DOMESTIC / FIRE WATER:**
1. (E) 3" DOMESTIC WATER METER / SUPPLY LINE LOCATED AT VAN NUYS BLVD AND PARKING AREA WILL BE USED FOR BOTH (E) TENT STRUCTURE AND (N) TINY HOME VILLAGE PROJECT.
 2. (N) 2" DOMESTIC WATER LINE, APPROXI. 300 FT CONNECT TO (E) 3" DOMESTIC WATER SUPPLY LINE IN FRONT OF THE MAIN ENTRANCE OF THE (E) TENT STRUCTURE.

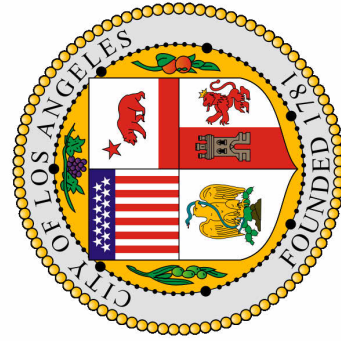
- SANITARY SEWER:**
1. (E) 6" SANITARY SEWER HOUSE LINE IN THE PARKING AREA WILL BE USED FOR BOTH (E) TENT STRUCTURE AND (N) TINY HOME VILLAGE PROJECT.
 2. (N) 4" SANITARY SEWER LINE, APPROXI. 300 FT CONNECT TO (E) 6" SANITARY SEWER HOUSE CONNECTION LINE IN FRONT OF THE MAIN ENTRANCE OF THE (E) TENT STRUCTURE.

- STORM DRAIN:**
1. (E) 6" EXISTING STORM DRAIN AND V-GUTTER TO BE PROTECTED
 2. CONFIRM DRAINAGE IS APPROPRIATE WITH THE PLACEMENT OF CABINS

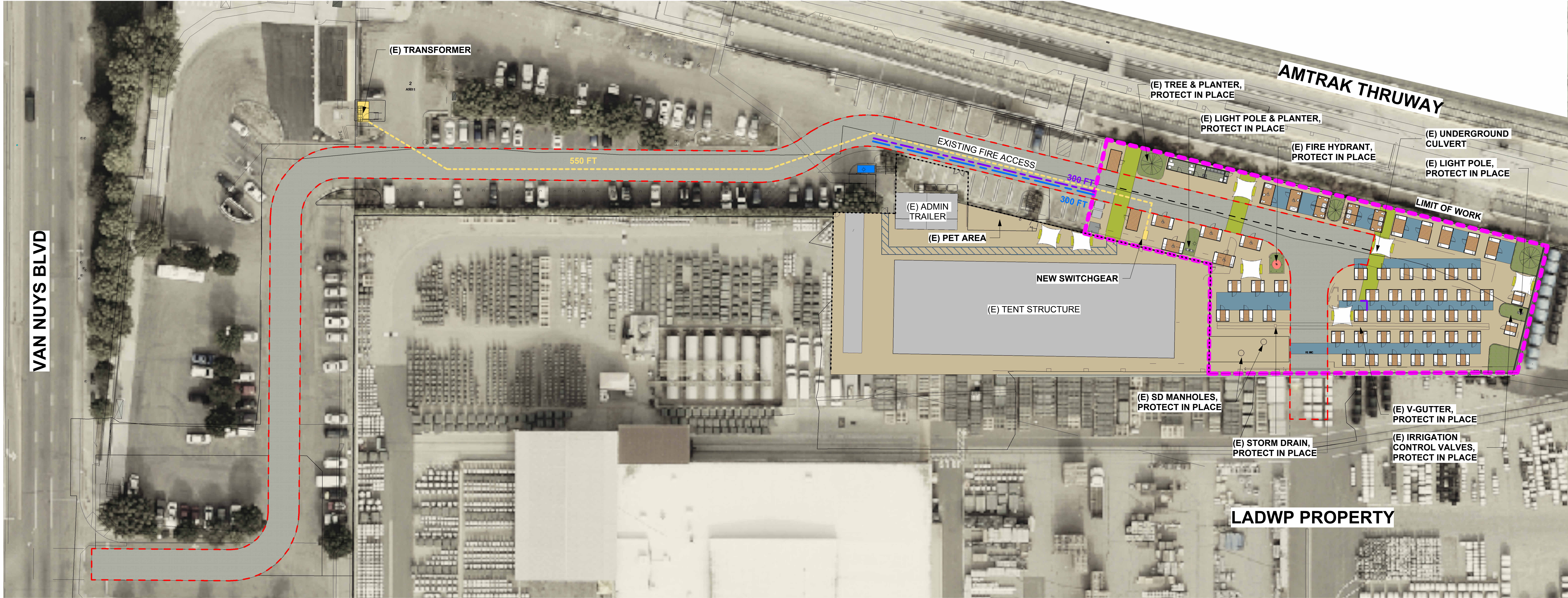
- LAFD REQUIREMENTS:**
1. THE PREVIOUS SHELTER ESTABLISHED A FIRE TRUCK ACCESS AND TURNAROUND THAT MUST BE MAINTAINED.

- ACCESSIBILITY:**
1. THE PATH OF TRAVEL MUST BE THROUGH THE EXISTING ABH.
 2. COMMUNAL AREAS AND AREAS FOR ACCESSIBLE CABINS MUST BE REGRADED TO MAINTAIN A 2% CROSS SLOPE.

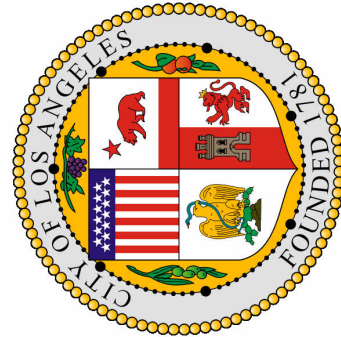
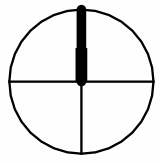
- UNDERGROUND EASEMENT:**
1. AN EXISTING CULVERT RUNS ALONG THE NORTHERN PART OF THE SITE FROM EAST TO WEST, PROTECT IN PLACE. NO STRUCTURES ARE ALLOWED OVER THE EASEMENT.

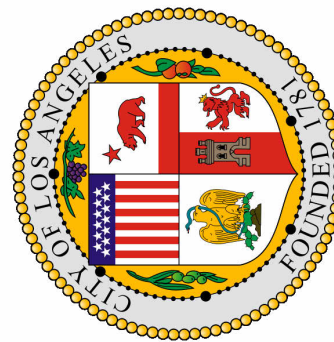
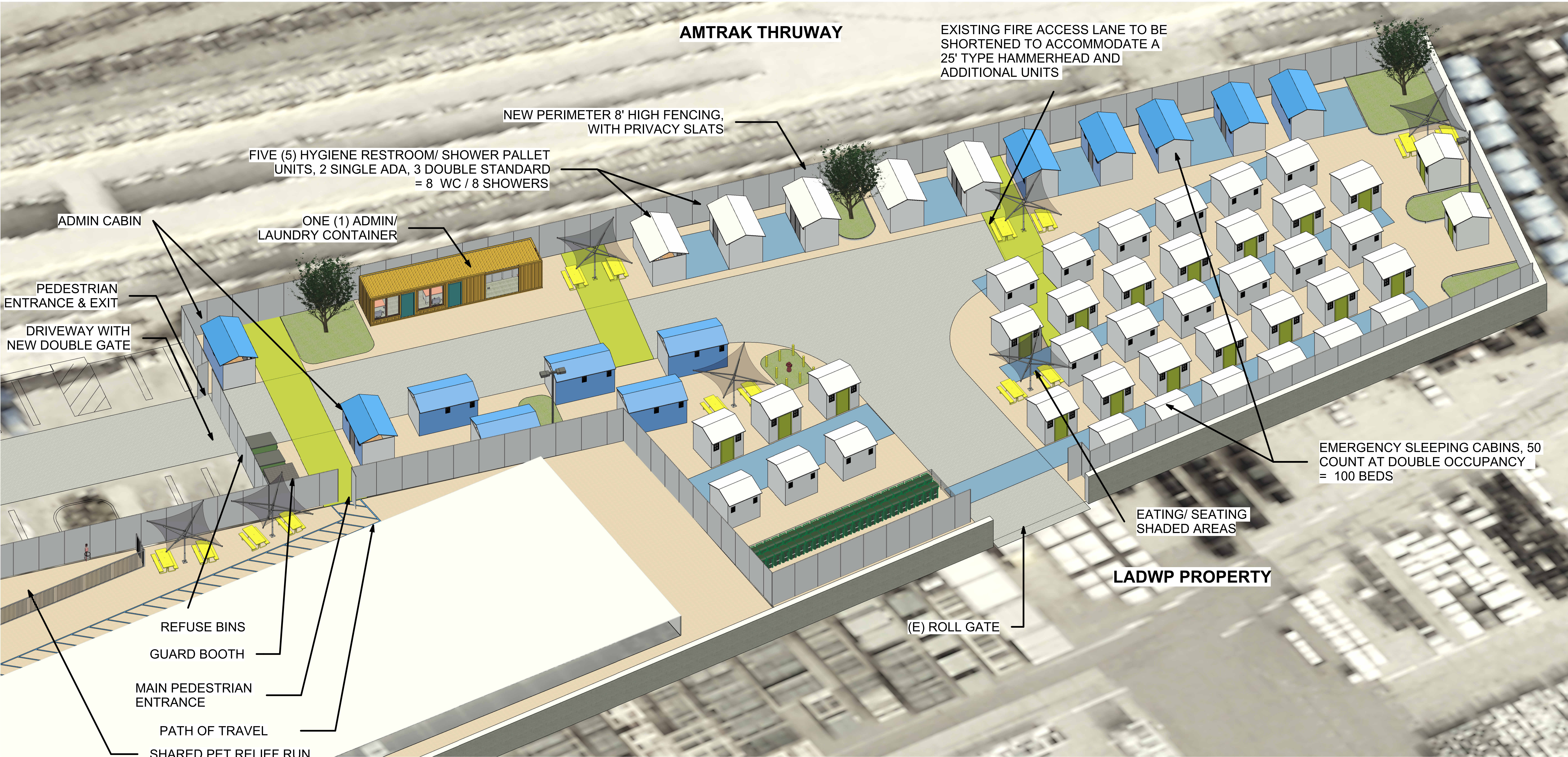


COUNCIL DISTRICT:	2	A001	1" = 20'-0"
DATE:	07/15/24	SY	MQ
DRAWN BY:			
CHECKED BY:			



UTILITY PLAN
1/32" = 1'-0"





TINY HOME VILLAGE: CD2 VAN NUYS
METROLINK STATION

7724 VAN NUYS BLVD., VAN NUYS, CA 91405

AERIAL VIEW

COUNCIL DISTRICT:	2	A003
DATE:	07/15/24	RH
DRAWN BY:	MQ	Scale:
CHECKED BY:		



SITE ENTRANCE



TREE AND PLANTER AT
NORTHWEST CORNER OF
SITE



CONTROL VALVES AT SITE
ENTRANCE PLANTER



LIGHT POLE ADJACENT TO
THE "A BRIDGE HOME" SITE



TREE AND PLANTER ALONG
RETAINING WALL



TREE AND PLANTER AT NORTHEAST
CORNER OF SITE



WEST SITE VIEW



LIGHT POLE AT EAST
PERIMETER WALL



IRRIGATION CONTROL VALVES AT
EAST PERIMETER WALL PLANTER



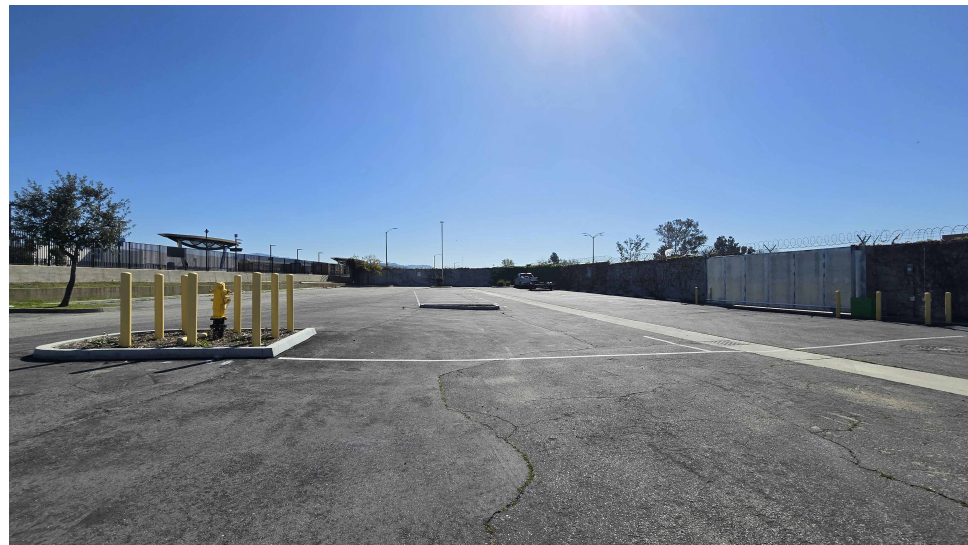
PLANTER AT SOUTHEAST CORNER
OF SITE



LADWP & LAFD ACCESS GATE



BOLLARDS AT ACCESS GATE



EAST SITE VIEW



CURB ISLAND



STORM DRAIN AND V-GUTTER



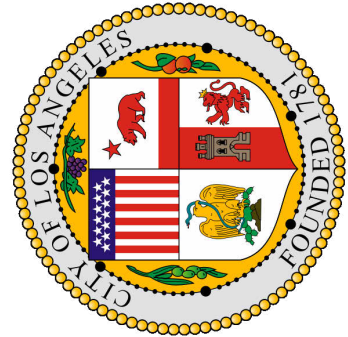
FIRE HYDRANT



DOORWAY FROM "A BRIDGE HOME"
SITE TO TINY HOME VILLAGE SITE



SOUTHWEST CORNER OF PROJECT
SITE



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 6
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PROJECT TITLE: CD 6 THV Sun Valley Metrolink - 8358 San Fernando Rd	LOG REFERENCE CF 23-1022-S6
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PROJECT LOCATION: 8358 San Fernando Road, in the Sun Valley - La Tuna Canyon Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 532-J1

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 6 THV Sun Valley Metrolink - 8358 San Fernando Rd project (Project) consists of funding allocation, construction, a new lease for approximately three years, and operation of a tiny home village in furtherance of providing emergency interim housing/navigation center services in the City. A third-party service provider, yet to be determined, 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 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:	<u>GOVERNMENT CODE</u> 65660(b) & 8698.4(a)(4)	<u>STATE CEQA GUIDELINES</u> 15269(c)	<u>CA PUBLIC RESOURCE CODE</u> 21080.27 & 21080(b)(4)
STATUTORY			

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. (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 funding allocation, construction, a new lease, and operation of a tiny home village in furtherance of providing emergency interim housing/navigation center in the City at the City-owned property at 8358 San Fernando Road. The final funding allocation will be determined when the plans are finalized.

The tiny home village, which includes approximately 208 beds, will be located on an irregularly shaped City-owned Property. Approximately 51,313-square-feet of an approximately 108,871-square-foot parcel that is currently developed with the existing Sun Valley Metrolink Station will be used for the tiny home village. The parcel is zoned [Q]M2-1-CDO-CUGU with a "Light Manufacturing" General Plan land use designation. Approximately half of the parcel will remain as "Park and Ride" for the Metrolink Train Station, with 82 standard and eight ADA accessible parking spaces. The tiny home village includes one congruent sleeping structure, sleeping units, hygiene, and administrative structures, staff parking spaces, an outdoor seating area with tables and umbrellas, and a pet relief area. Utility work including electrical, water, and sewer will be needed to provide service to the facility. Approximately 17 trees need to be removed to accommodate the facility. The trees will be replaced after the facility is removed.

The conceptual plan, (see Attachment), which is subject to further refinement, includes the following amenities (with anticipated sizes if available):

- One 24 X 40-foot administrative structure with two offices and conference rooms,
- One 12 X 70-foot hygiene structure with five restrooms (one ADA accessible) five showers (one ADA accessible), and laundry machines,
- One 60 X 120-foot sleeping structure with 44 beds,
- Three ADA accessible and three two-stall standard hygiene pallet units,
- Two Administrative counseling pallet units
- One guard booth,
- Approximately 280-square-foot pet relief area
- 21 Outdoor tables with umbrellas with seating for approximately 84 people
- Three parking stalls, including one ADA accessible
- Fencing and decking, approximately 560 linear feet and 1,150 linear feet respectively.

The Project will be funded using Behavioral Health Continuum Infrastructure Program funds (California Code, Welfare and Institutions Code - WIC Section 5960). The final funding allocation will be determined when the plans are finalized.

The facility will be operated consistent with the applicable Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters, low barrier navigation centers, and interim or 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, , will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

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) it is anticipated that participants' pets will be allowed in the facility (2) the storage of possessions is provided in the individual or shared rooms; and (4) privacy to participants is provided in the individual rooms or with partitions. The City intends for this Project to be operated as low barrier navigation centers consistent with Government Code Section 65660.

Funding. The Project includes funding allocation that includes Behavioral Health Continuum Infrastructure Program funds for the operation of the facility. 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 City-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).

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 construction, a City lease of City-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,

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).

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).

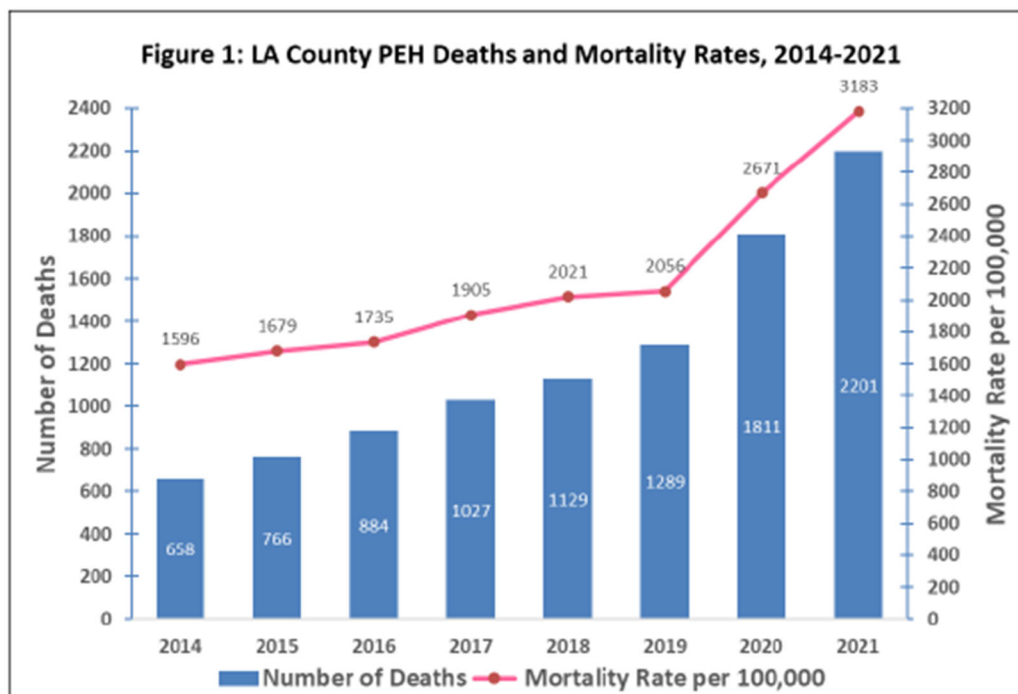
Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated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

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.

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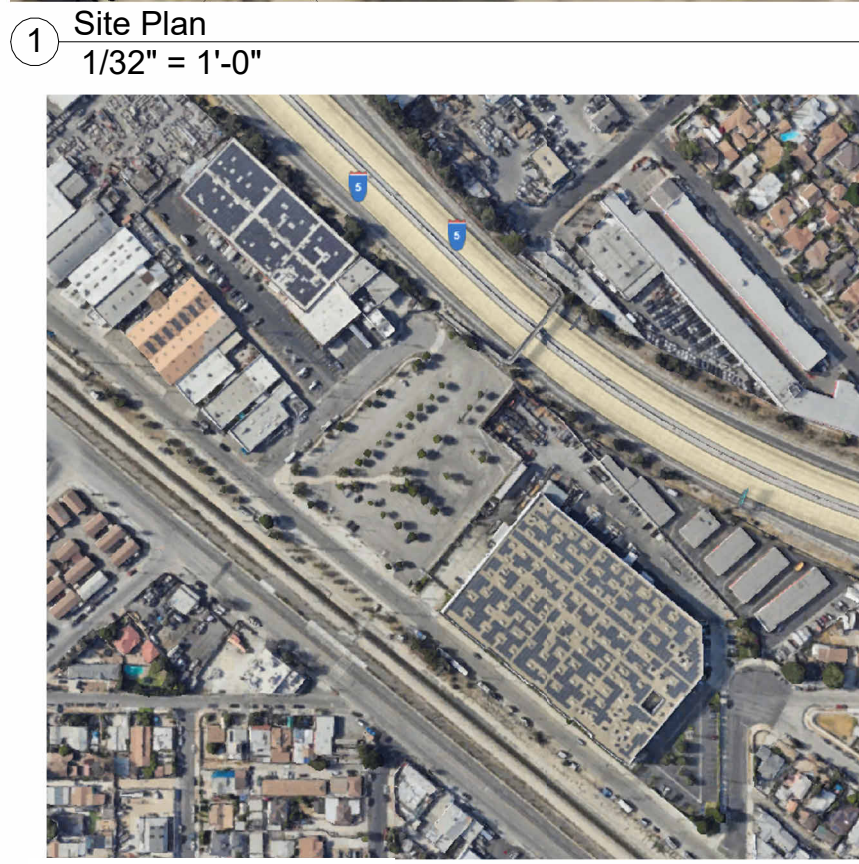
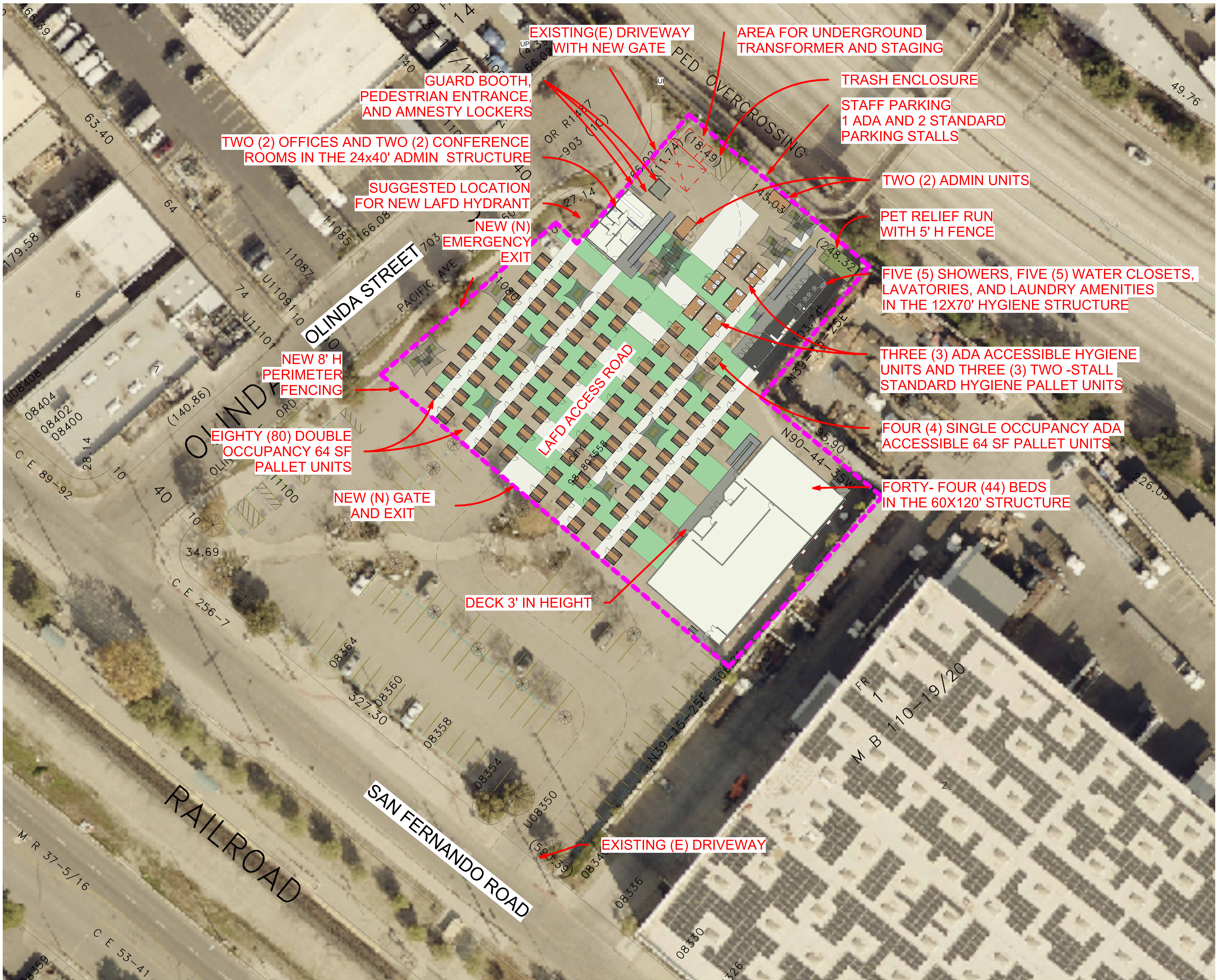
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SITE CONTEXT

VICINITY AND SITE DATA

PROJECT SCOPE:

THE PROJECT IS LOCATED AT THE EXISTING SUN VALLEY METROLINK STATION AT 8358 SAN FERNANDO ROAD IN SUN VALLEY, CALIFORNIA.

ABOUT ONE HALF OF THE SITE WILL REMAIN AS "PARK AND RIDE" FOR THE METROLINK TRAIN STATION. THE OTHER HALF (NE) OF THE SITE WILL BE A TINY HOME VILLAGE CONSISTING OF PALLET STRUCTURES AS WELL AS RE-USED ABH SLEEPING, HYGIENE, AND ADMIN STRUCTURES FROM THE AETNA SITE, WHICH IS BEING DEMOBILIZED. THERE WILL ALSO BE PARKING PROVIDED FOR STAFF, SEATING WITH UMBRELLAS, A PET RELIEF RUN, AND ADDITIONAL ADMIN AND HYGIENE UNITS. MAXIMUM NUMBER OF BEDS IS 208.

COMPONENTS BREAKDOWN:

- APPROX. 51,313 SF SITE AREA (APPROX. 108,871 SF TOTAL PARCEL AREA)
- ASSESSOR PARCEL NUMBER (APN) 2632026900 TRACT TR 7772
- 80 - DOUBLE OCCUPANCY 64 SF PALLET UNITS
- 4 - SINGLE OCCUPANCY 64 SF PALLET UNITS (ADA ACCESSIBLE UNITS)
- 44 - BEDS IN THE 60X120' STRUCTURE (208 MAXIMUM BEDS IN TOTAL)

AMENITIES:

- 1 - 24 X 40' ADMIN STRUCTURE WITH 2 OFFICES AND CONFERENCE ROOMS
- 1 - 12 X 70' HYGIENE STRUCTURE WITH 5 RESTROOMS (1 ADA ACCESSIBLE), 5 SHOWERS (1 ADA ACCESSIBLE), AND LAUNDRY MACHINES
- 1 - 60 X 120' SLEEPING STRUCTURE WITH 44 BEDS
- 3 - ADA ACCESSIBLE HYGIENE PALLET UNITS WITH SHOWER, SINK, AND TOILET
- 3 - TWO -STALL STANDARD HYGIENE PALLET UNITS WITH SHOWER, SINK, AND TOILET (6 TOTAL)
- 2 - PALLET ADMIN COUNSELING UNITS
- 1 - GUARD BOOTH
- 1 - PET RELIEF AREA (280 SF)
- 21 - OUTDOOR TABLES WITH UMBRELLAS (SEATING FOR 84)
- 3 - PARKING STALLS (1 ADA)

FENCING AND DECKING:

- FENCING 560 LF
- DECKING 1,150 SF

ACCESSIBILITY:

- AN EXISTING ACCESSIBLE WALKWAY IS AVAILABLE ALONG N SAN FERNANDO ROAD AND OLINDA STREET

TREES:

- NUMBER OF TREES TO BE REMOVED: 17

METROLINK PARK AND RIDE PARKING:

- 82 STANDARD PARKING SPACES TO REMAIN
- 8 ADA PARKING SPACES TO REMAIN

UTILITIES

ELECTRICAL:

- THE SITE WILL REQUIRE A NEW 800A @480/277V, THREE PHASE, FOUR WIRE, UNDERGROUND ELECTRIC SERVICE FROM OLINDA STREET.
- A LADWP TRANSFORMER WILL BE INSTALLED IN THE PARKING LOT WITHIN THE PROJECT SITE

DOMESTIC AND FIRE PROTECTION WATER:

- 8" WATER MAIN IN OLINDA ST. 2" DOMESTIC AND 4" FIRE PROTECTION COMBO METER INSTALLED BY LADWP.
- APPROX. 300 FT OF 2" DOMESTIC WATER LINE WITHIN THE PROPERTY LINE.
- APPROX. 300 FT OF 4" FIRE PROTECTION WATER LINE WITHIN THE PROPERTY LINE.

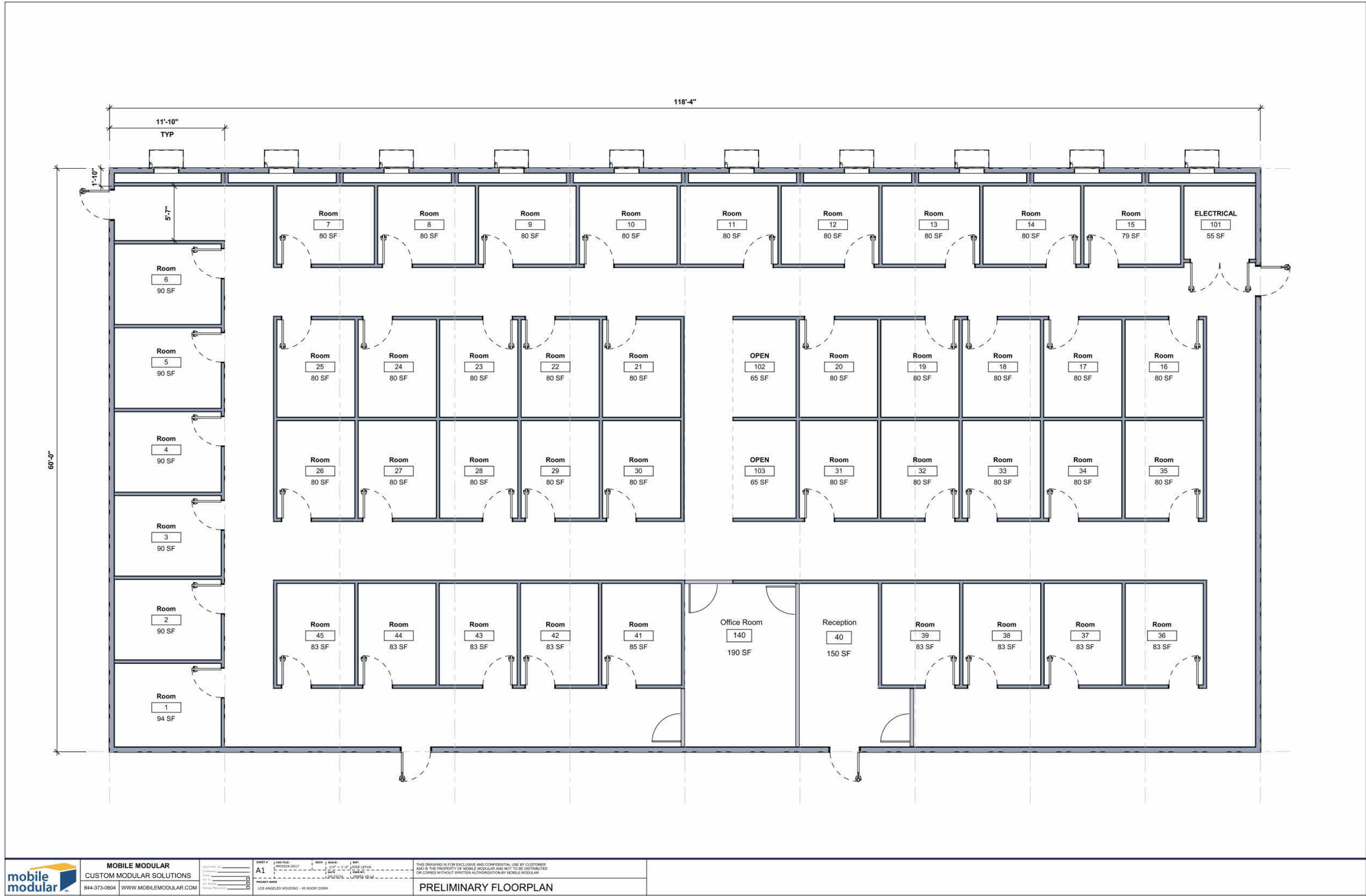
SANITARY SEWER:

- 8" SANITARY SEWER MAIN (PIPE ID: 4000211640002047A) IN OLINDA ST. APPROX. 50 FT OF 6" HOUSE CONNECTION TO THE PROPERTY. APPROX. 300FT OF 4" SANITARY SEWER LINE WITHIN THE PROPERTY LINE.

FIRE DEPARTMENT REQUIREMENTS:

- TWO FIRE HYDRANTS MORE THAN 300' OF SITE AT 8400 N SAN FERNANDO RD., AND AT 8326 N SAN FERNANDO RD. A NEW HYDRANT LIKELY REQUIRED. SUGGESTED NEAR SITE ENTRANCE ON OLINDA STREET. CHECK LAFD REQUIREMENTS.
- NEW 20' LAFD FIRE ACCESS ROAD REQUIRED.

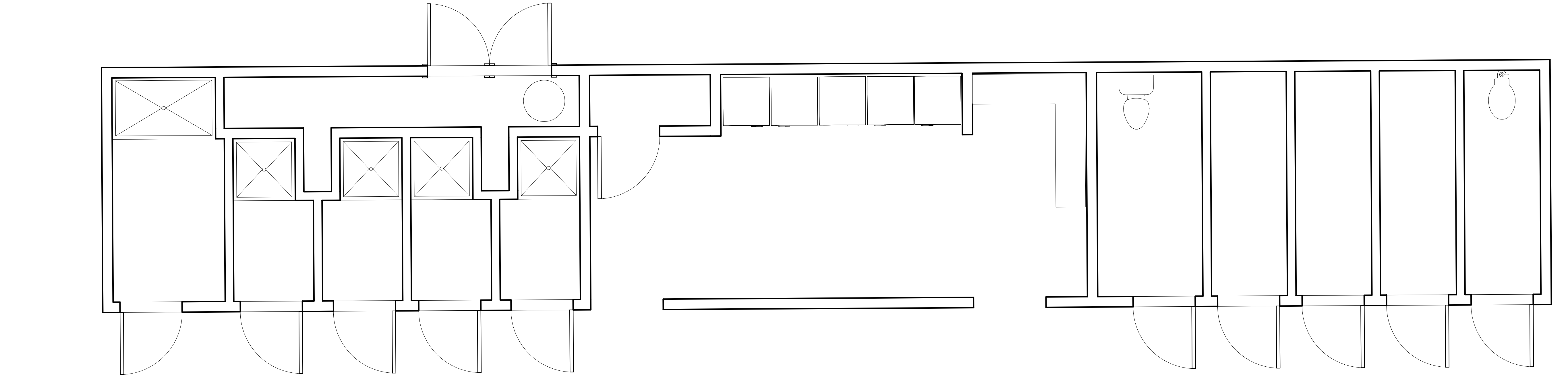




60' X 120' SLEEPING STRUCTURE WITH FORTY- FOUR (44) BEDROOMS, ONE OFFICE, AND ONE RECEPTION ROOM

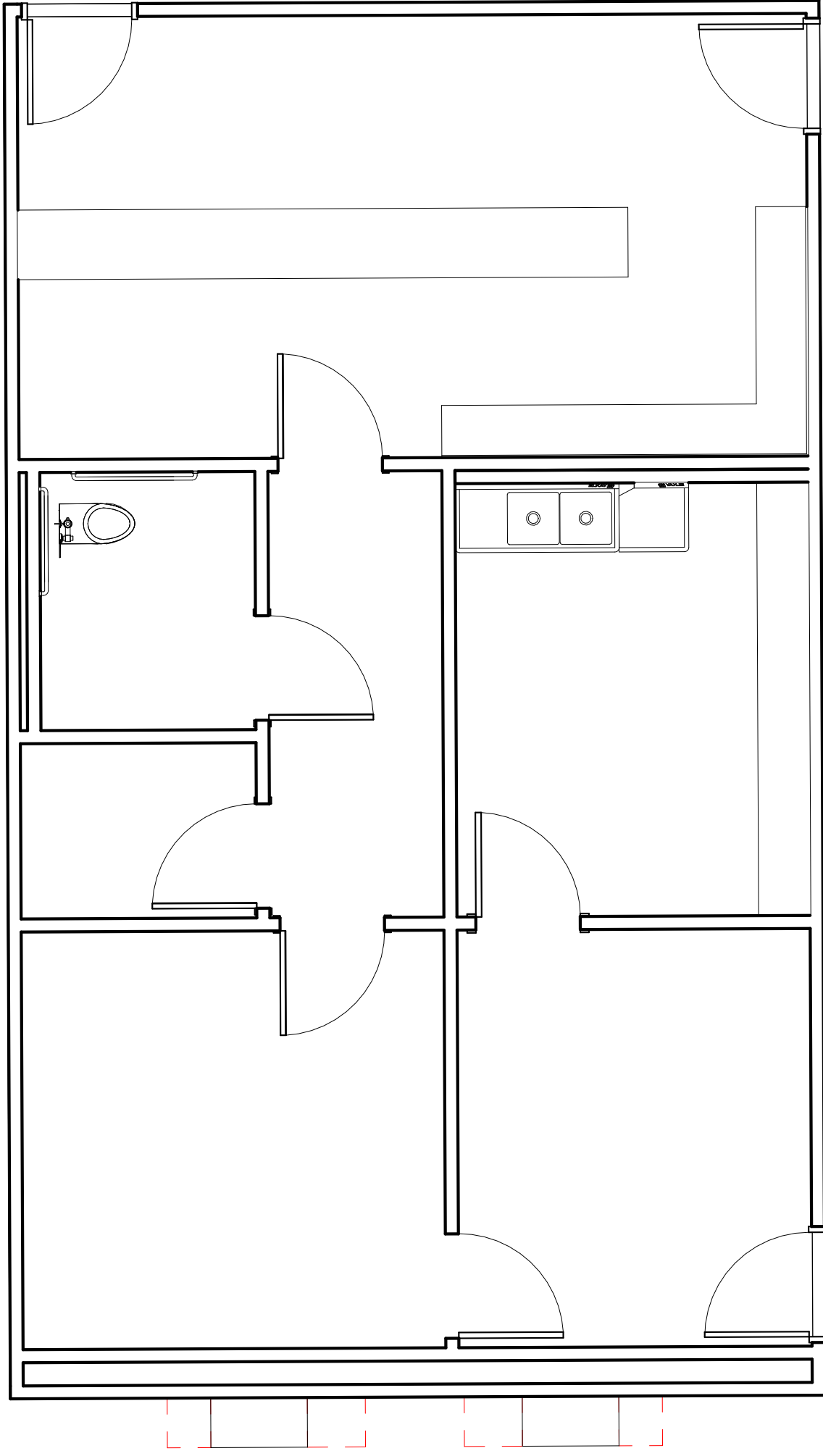
④ Admin Structure
1/4" = 1'-0"

24 X 40' ADMIN FACILITY WITH 2 OFFICES AND CONFERENCE ROOMS



① Hygiene Structure
3/8" = 1'-0"

12 X 70' HYGIENE FACILITY WITH 5 RESTROOMS (1 ADA ACCESSIBLE), 5 SHOWERS (1 ADA ACCESSIBLE), AND LAUNDRY MACHINES





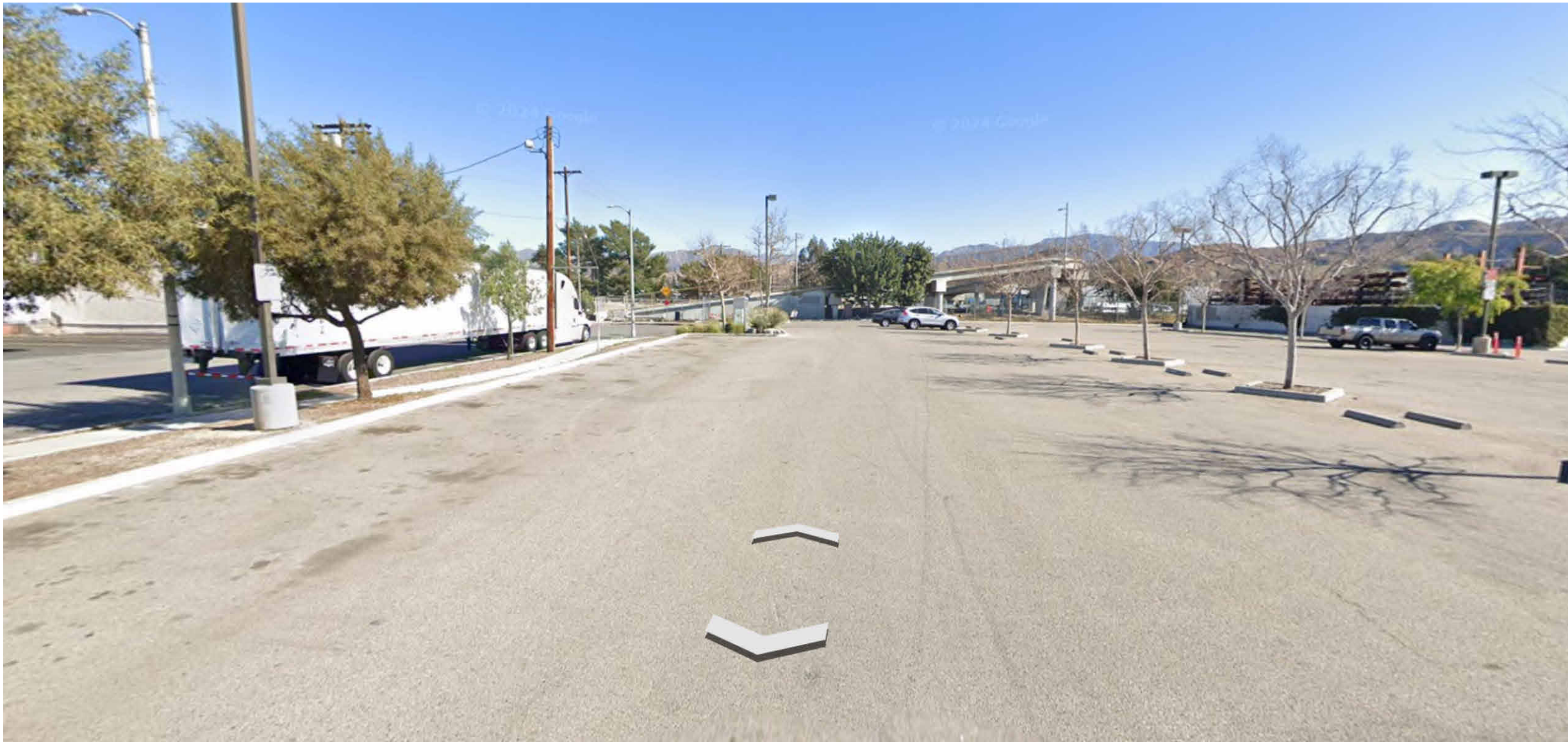
AERIAL VIEW FROM THE SOUTHWEST CORNER OF THE SITE AT N SAN FERNANDO ROAD AND OLINDA STREET.



VIEW OF THE EXISTING DRIVEWAY, ENTRANCE TO THE POTENTIAL TINY HOME VILLAGE FROM OLINDA STREET.



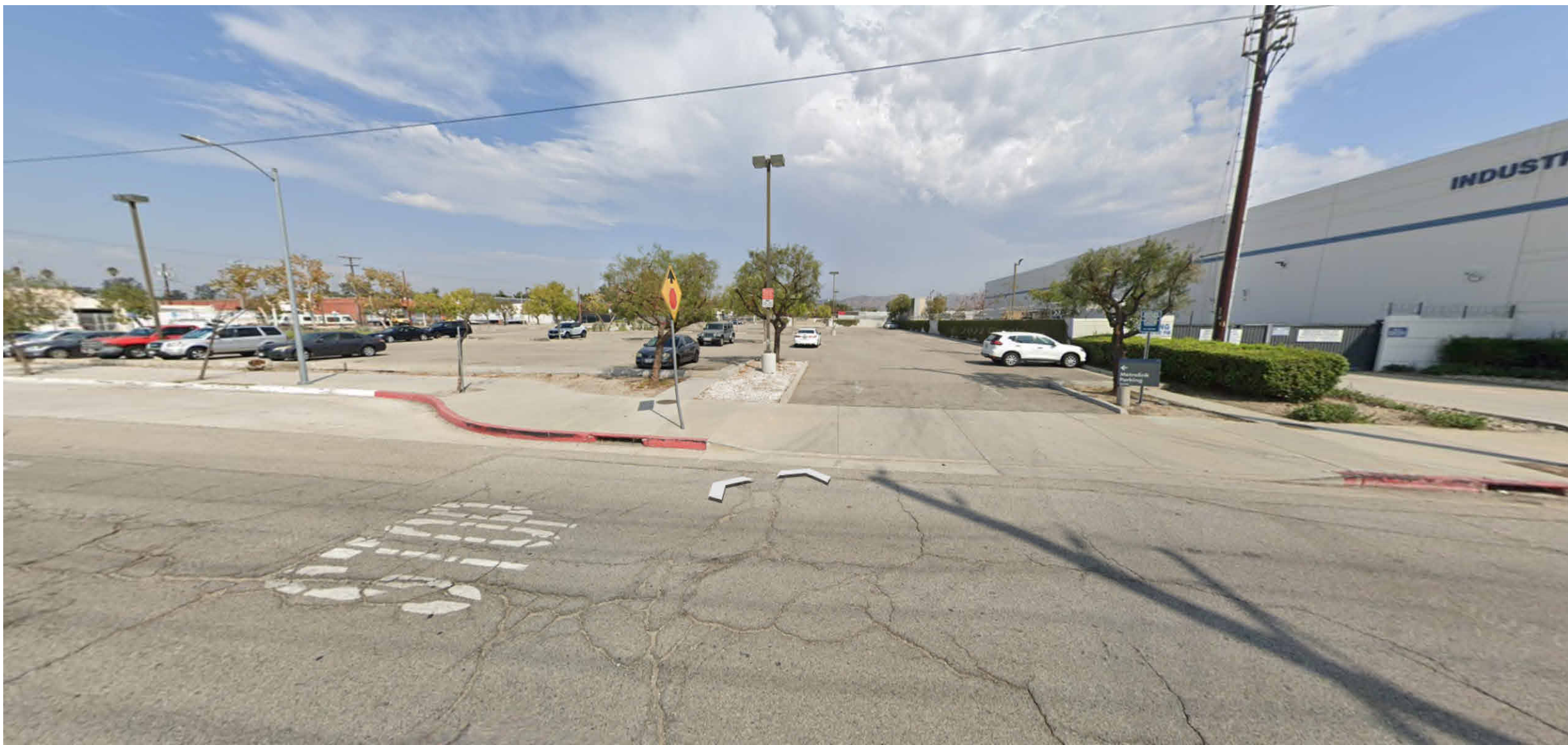
VIEW OF THE POTENTIAL TINY HOME VILLAGE SITE FROM THE NORTH LOOKING SOUTH.



VIEW OF THE POTENTIAL TINY HOME VILLAGE SITE FROM THE SOUTH LOOKING NORTH ALONG OLINDA STREET.

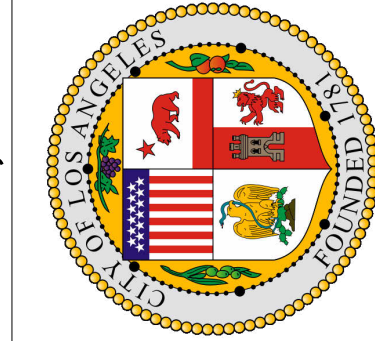


VIEW OF THE SITE DIVISION BETWEEN THE POTENTIAL TINY HOME VILLAGE SITE AND THE EXISTING "PARK AND RIDE" METROLINK PARKING LOT. VIEW IS FROM THE NORTHEAST LOOKING TOWARD THE EXISTING DRIVEWAY ON N SAN FERNANDO ROAD.



VIEW OF THE EXISTING DRIVEWAY ON N SAN FERNANDO ROAD, ENTRANCE TO THE EXISTING "PARK AND RIDE" METROLINK PARKING LOT.

SITE PHOTOS
PHOTOS SOURCED FROM GOOGLE EARTH



COUNCIL DISTRICT:	6	A104
DATE:	4/30/2024	
DRAWN BY:	RH	
CHECKED BY:	MQ	
		Scale: