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# CITY OF LOS ANGELES

CALIFORNIA



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**DEPARTMENT OF  
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**BUREAU OF  
ENGINEERING**

**GARY LEE MOORE, PE, ENV SP**  
CITY ENGINEER

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

<http://eng.lacity.org>

March 22, 2021

The Honorable Nury Martinez  
President  
Los Angeles City Council

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

**CRISIS AND BRIDGE HOUSING FACILITIES AT CD 14 ARROYO SECO  
TRANSITIONAL HOUSING (ARROYO DRIVE AND AVENUE 60) ON THE EASTERLY  
PORTION OF APN NO. 5492-021-900, CD 05 7253 MELROSE AVENUE HOMELESS  
SHELTER, AND CD 13 317 N. MADISON SAFE SLEEPING SHELTER (C.F. 20-0841)  
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF EXEMPTIONS  
(NOEs)**

Dear President Martinez and Honorable Members:

As set forth in the City Administrative Officer report, dated March 18, 2021, relative to the fifth report regarding the COVID-19 Homelessness Roadmap funding recommendations, including substitution of Homeless Housing, Assistance, and Prevention Program funding with Coronavirus Relief Funding for eight previously approved interim housing sites, including the Crisis and Bridge Housing facilities located at Arroyo Seco Transitional Housing (Arroyo Drive and Avenue 60) on the easterly portion of APN No. 5492-021-900 in Council District 14, 7253 Melrose Avenue Homeless Shelter in Council District 5, and 317 N. Madison Safe Sleeping Shelter in Council District 13.

**RECOMMENDATION**

Staff recommends that the City Council determine the Crisis and Bridge Housing facilities located at Arroyo Drive and Avenue 60 on the easterly portion of APN No. 5492-021-900, at 7253 Melrose Avenue, and at 317 N. Madison, which allow for minor improvements, a new lease, and the operation as temporary homeless shelters for those experiencing homelessness, are statutorily exempt under Public Resources Code Section 21080(b)(4) as specific actions necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code Section 21080.27 (AB 1197)

Honorable Nury Martinez  
March 22, 2021  
Page 2 of 2

applicable to City of Los Angeles emergency homeless shelters; and, because these projects use "Homeless Housing, Assistance and Prevention Program funds," they are also exempt under Governor's Order N-32-20. Please refer to the attached NOEs.

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

Sincerely,



Electronically signed by 21866

Gary Lee Moore, PE, ENV SP  
City Engineer

#### Attachments

GLM/JF/mem:ab

Q:\GLM\City Engineer\GLM Signed Documents\2021 Documents\Transmittal\_CF20-0841\_Arroyo\_Seco-7253\_Melrose\_Ave-317\_N\_Madison\_Ave.pdf

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

## **ATTACHMENTS**

- 1. Arroyo Seco Transitional Housing (Arroyo Drive and Avenue 60) NOE**
- 2. 7235 Melrose Avenue Homeless Shelter NOE**
- 3. 317 N. Madison Safe Sleeping Shelter NOE**

# **ATTACHMENT 1**

**Arroyo Seco Transitional Housing (Arroyo Drive and Avenue 60) NOE**



**COUNTY CLERK'S USE**

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

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

<b>LEAD CITY AGENCY AND ADDRESS:</b> City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, MS 939, Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b>  14
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<b>PROJECT TITLE:</b> CD14 Arroyo Seco - Transitional Housing – Hermon-Highland Park in Northeast Los Angeles	<b>LOG REFERENCE</b> <b>C.F. 20-0841</b>
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**PROJECT LOCATION:** The project location is parcel APN# 5492-021-900. The Project Site is on the easterly side of the parcel, with access located approximately at the intersection of Ave 60., just west of Arroyo Dr. in the Hermon - Highland Park area of the Northeast Community Plan Area in the City of Los Angeles Council District 14 (CD 14), see *Figure 1 – Project Site Location. T.G. 595D2, D3, D4*

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT** The proposed project consists of the construction of a new homeless shelter at a City of Los Angeles owned parcel that includes a tiny home village of small, detached, pre-fabricated cabins assembled on site with beds for up to 224 individuals, three hygiene trailers with restrooms, showers, lavatories, drinking fountains, perimeter security fencing, and designated seating areas for food services for people experiencing homelessness. The nature of this project is to serve the local homeless community within the vicinity of the project. The purpose of the project is to provide emergency shelter for individuals experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The project includes approximately 115 tiny homes; 109 with double beds (218 occupants), six with Americans with Disabilities Act (ADA) compliant single beds, and there is one tiny home for storage that has no beds. There are also six pre-fabricated structures for administration, and one structure for laundry facilities. The Project Site is approximately 48,000-square feet (sf) and is currently developed as the Hermon Park in the Arroyo Seco. The project includes beds in crisis and bridge housing for up to 224 people experiencing homelessness. Project beneficiaries include the homeless community, the public and local businesses. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. (Please see the attached narrative for more details). On March XX , 2021, the Los Angeles City Council determined this action was exempt from CEQA and approved the project.

**CONTACT PERSON:** Maria Martin **TELEPHONE NUMBER:** 213-485-5753

<b>EXEMPT STATUS: (Check One)</b>	<u>CITY CEQA</u>	<u>STATE CEQA</u>	<u>CA PUBLIC</u>
	<u>GUIDELINES</u>	<u>GUIDELINES</u>	<u>RESOURCE CODE</u>
	<input checked="" type="checkbox"/> STATUTORY	15269(c)	21080(b)(4) & 21080.27
<input checked="" type="checkbox"/> Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".			

**JUSTIFICATION FOR PROJECT EXEMPTION:** This project is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the project uses "Homeless Housing, Assistance and Prevention Program funds," it is exempt under Governor's order N-32-20. (see attached narrative).

**IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING**

<b>SIGNATURE:</b>  Maria Martin	<b>TITLE:</b> Environmental Affairs Officer Environmental Management Group	<b>DATE:</b>
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<b>FEE:</b> \$75.00 _____	<b>RECEIPT NO.</b>	<b>REC'D BY</b>	<b>DATE</b>
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## 1. EXEMPTION NARRATIVE

The proposed project includes the construction of a new homeless shelter site (Project Site) that will provide emergency shelter, three hygiene trailers, storage, and food services to people experiencing homelessness. The Project Location is located on a 6.8-acre parcel. The Project Site is on an approximately 1.1-acre, irregularly shaped parcel that is currently City owned and developed as Hermon Park in the Arroyo Seco. The Project Site is on an easterly 48,000-sf portion of the park, abutting the Arroyo Seco Parkway and Arroyo Seco Flood Channel on the eastern boundary. There is a 20-ft fire lane along the eastern boundary of the site, along the Arroyo Seco Parkway. The site is located within the Highland Park-Garvanza Historic Preservation Overlay Zone. (City of Los Angeles Department of City Planning, 2021)

The Project Site is located in the Hermon-Highland Park area of the Northeast Community Plan Area in the City of Los Angeles Council District 14 (CD 14), Assessor's Parcel Number (APN) 5492-021-900, see *Figure 1 – Project Site Location*. The project includes the construction of a new homeless shelter site on a Recreation and Park's owned parcel that includes tiny homes with beds for up to 224 individuals experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. Tiny homes are small, detached, pre-fabricated cabins made of aluminum and composite materials that will be assembled on site. The project includes approximately 115 tiny homes; 109 with double beds (218 occupants) and 6 with ADA single beds.

Additionally, there will be six pre-fabricated structures for administration, and laundry facilities. The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to *Crisis Housing Program for All Populations Scope of Required Services* (LAHSA, 2020-2021). A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The site will also include outdoor lighting, perimeter fencing, hygiene trailers with restrooms, showers, lavatories, drinking fountains, a double gate, a trash bin area, outdoor seating, new power service, new asphalt paving, staff parking, site lighting, a food distribution area, and designated seating areas for food services. No trees will be removed.

The Project Site is within an urban area on a parcel that is currently developed with a Hermon Park in the Arroyo Seco. The project is zoned OS with an Open Space land use designation. This part of the park is located in the western portion of the Hermon Park in the Arroyo Seco group of parks, which is located just west of the Arroyo Seco Parkway, at the intersection of and Ave. 60 and Arroyo Dr. As shown in Figure 1, below, there is a combination of qualified urban uses that are adjacent to the site. The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses. There are multi-family residential uses to the north, south, and west of the parcel. The entire eastern boundary is runs along and is adjacent to the Arroyo Seco Parkway and the Arroyo Seco Flood Channel, both of which are considered public institutional uses. The entire perimeter of the parcel is surrounded by qualified urban uses. Therefore, the parcel meets the definition of infill site.

**Figure 1  
Project Site Location Map**



**I. PROJECT HISTORY: HOMELESS SHELTER CRISIS AND EMERGENCY**

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

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a



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

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

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

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

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

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary

heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

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

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

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

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

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

## **B. Unexpected and Unabated Dramatic Surge in Homelessness**

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

the City of Los Angeles.

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

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

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

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

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

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

**Table 3**  
**2020 Homeless Count Data Summary**

	<b>Number of Individuals</b>	<b>Change from 2019</b>
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

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

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

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

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

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

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

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



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

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

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

(Mayor Eric Garcetti, 2020)

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

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

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

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

## II. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

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

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

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

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

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

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

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

### B. The Project is Exempt under the Governor’s Executive Order No. N-32-20, Suspending CEQA

On March 18, 2020, Governor Newsom signed and issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020) suspending CEQA and the CEQA Guidelines’ requirements “for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89, signed on March 17, 2020.” The Governor noted that “strict compliance with the various statutes and regulations specified in this order would prevent, hinder, or delay appropriate actions to prevent and mitigate the effects of the COVID-19 pandemic.” Because this project qualifies for and will use Homeless Housing, Assistance, and Prevention Program funds for at least a portion of the work at the site,” it is exempt from CEQA under the Governor’s suspension order.

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

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

### **1. City of Los Angeles Declaration of a Shelter Crisis**

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

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

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

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

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

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

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

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

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

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

Housing First also includes time-limited rental or services assistance, so long as the housing and

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

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

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

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



The project provides approximately 115 pallets which allow for presence of partners. This project is pet friendly. Participants are allowed to bring their pets to the shelter and live with them inside their room. There is no pet play area onsite. The project has storage within each room for personal possessions. The project is designed to provide privacy to participants by providing each family or individual with their own room. There are private living quarters with both private or communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

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

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

### **3. The Project Complies with Government Code Section 65662**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **4. The Project is in a Qualified Location Under AB 1197**

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The Department of City Planning determined on March 4, 2021 that the parcel identified as APN # 5492-021-900, approximately located at Ave. 60 just west of Arroyo Dr. meets this requirement because at least 75% of the perimeter of the parcel is surrounded by qualified urban uses. The Project Site is within a larger approximately 6.8-acre parcel that is located just west of the Arroyo Seco Parkway (the 110 Freeway) and the Arroyo Seco Flood Control Channel. The Arroyo Seco, is a 24.9-mile-long seasonal river, canyon, watershed, and cultural area that has been channelized into a flood control channel. (Wikipedia, 2021) It runs along the entire east side of the Arroyo Seco Parkway, and through this specific portion of the Hermon - Highland Park Northeast community of Los Angeles. The parcel and Project Site's entire eastern boundary runs along and abuts the Arroyo Seco Parkway.



The Project Site consists of one irregularly shaped lot with an area of approximately 1.1 acre having a frontage along Ave. 60, just west of Arroyo Dr. There is a fire access lane that spans the eastern boundary of the site. The project location is zoned OS with an Open Space land use. The project location is located within an urban area on a parcel that is currently developed as a Hermon Park in the Arroyo Seco. At least 75% of the perimeter of the parcel is surrounded by qualified urban uses. There are multi-family residential uses to the north, south and west of the parcel. The eastern boundary abuts the Arroyo Seco Parkway and the Arroyo Seco Flood Channel, both of which are considered a public institutional use. Therefore, the parcel meets the definition of infill site. (City of Los Angeles Department of City Planning, 2021) Therefore, the Project parcel and site are surrounded by urban uses and is considered a qualified location under AB 1197.

#### **5. The Project Involves Qualified Funding Under AB 1197**

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The project is funded, at least in part, through State of California Homeless Housing, Assistance and Prevention Program (HHAP) for the improvements. The City also has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement is met.

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

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." The project includes the construction of a new homeless shelter site that includes tiny homes and operating an emergency shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles, and qualify for exemption from CEQA under AB 1197.

#### **7. AB 1197 Conclusion**

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

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Attachment

Project Site Plan



# CD14 ARROYO SECO PALLET SHELTERS: ARROYO SECO PARKWAY (BETWEEN AVENUE 60 AND AVENUE 64)

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- E300 ELECTRICAL FLOOR PLAN
- E301 NORMAL SITE PHOTOMETRICS
- E302 EMERGENCY SITE PHOTOMETRICS
- E400 STANDARD DETAILS
- E700 PALLET SHELTER
- E701 PALLET SHELTER
- E800 SPECIFICATION SHEETS
- E801 SPECIFICATION SHEETS

**PLUMBING:**

- P101 PLUMBING SITE PLAN
- P102 PLUMBING DETAILS

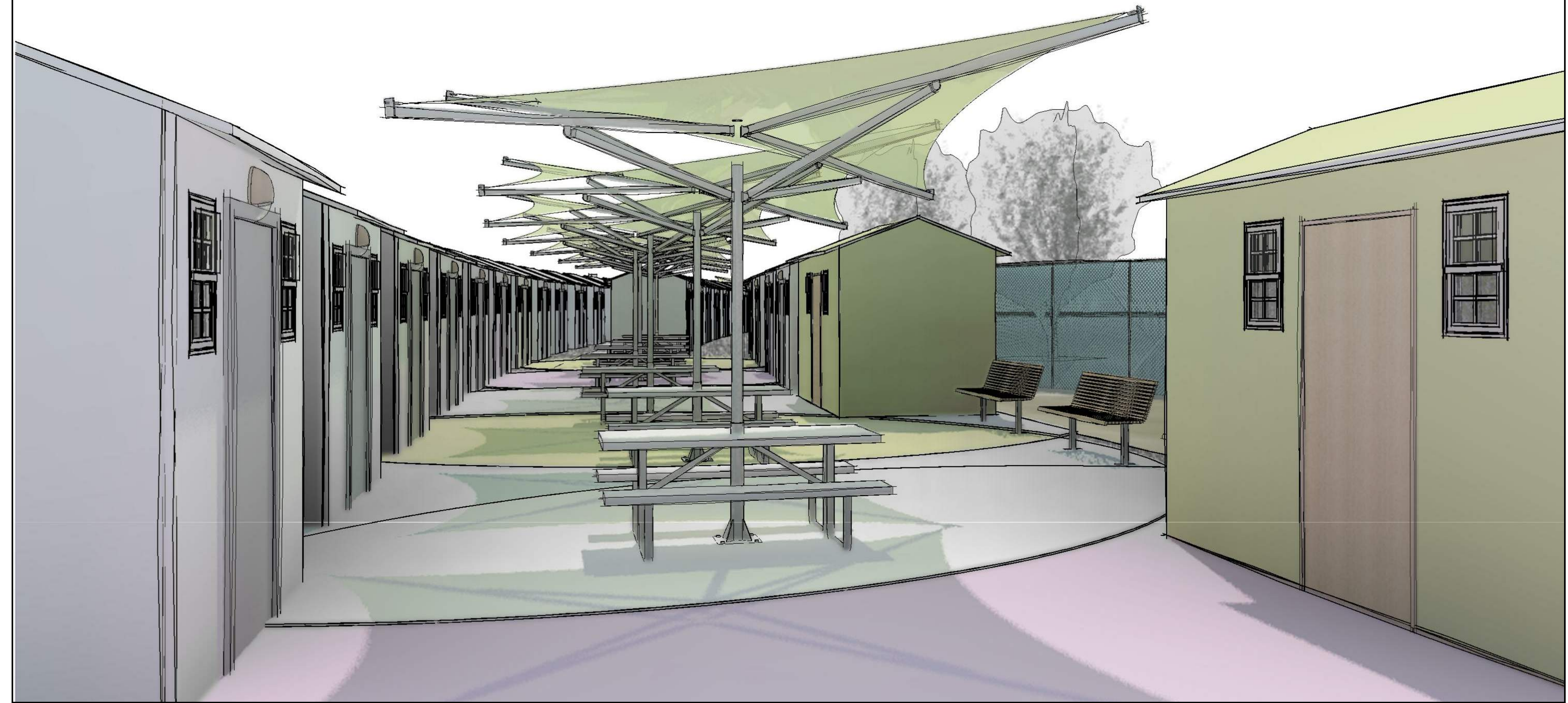
**COVER**

COUNCIL DISTRICT: 14  
DATE: 03/22/21  
DRAWN BY: EV  
CHECKED BY: MQ  
Scale: G001

GARY LEE MOORE, PE, ENV SP  
CITY ENGINEER

ACCEPTED BY: \_\_\_\_\_ DATE: \_\_\_\_\_  
DEPUTY CITY ENGINEER PROGRAM MANAGER  
CITY ENGINEER

**CD14 ARROYO SECO  
PALLET SHELTERS**  
ARROYO SECO PARKWAY (ALLEY)  
BETWEEN AVE 60 & AVE 64, 90042







**CD14 ARROYO SECO  
TINY HOME VILLAGE PROJECT**

**PROJECT SCOPE:**  
NEW EMERGENCY HOMELESS PALLET SHELTER PROJECT IN AN EXISTING CITY. DEPARTMENT OF RECREATION AND PARKS, PARKING LOT. PROJECT WILL PROVIDE SLEEPING CABINS AND BEDS FOR UP TO 224 INDIVIDUALS. SITE AMENITIES INCLUDE MOBILE HYGIENE UNITS WITH RESTROOMS, SHOWERS, LAVATORIES, AND DRINKING FOUNTAINS; LAUNDRY STATION; DESIGNATED SEATING AREAS WITH MOBILE UMBRELLAS FOR FOOD SERVICES; AND PALLETTS FOR ADMINISTRATIVE OFFICES AND COUNSELING. SITE PERIMETER TO BE FENCED WITH PRIVACY SLATS AND ACOUSTICAL BLANKETS ALONG FREEWAY.

**SITE COMPONENTS BREAKDOWN:**  
 • EMERGENCY SLEEPING CABINS (PALLET 64): 115  
 109 STANDARD - DOUBLE BEDS  
 06 ACCESSIBLE - SINGLE BEDS  
**TOTAL BEDS: 224**

**UTILITIES:**  
**ELECTRICAL:** SITE WILL BE SERVED USING OVERHEAD POWER FROM THE SOUTH, TAKING POWER FROM THE POLE LOCATED AT BENNER STREET AND AVENUE 60. SITE REQUIRES A 600A, 480/277V, 3 PHASE, 4 WIRE OVERHEAD SERVICE.  
**WATER:** THERE IS A 12" WATER STEEL PIPE ON AVENUE 60 FOR DOMESTIC AND FIRE WATER (APPROXIMATELY 60 FEET FROM WATER MAIN TO THE METERS).  
**SEWER:** THERE IS A 30" SEWER MAIN (PIPE ID 4671217046712169A) ON ARROYO SECO PKWY FOR THE SANITARY SEWER (APPROXIMATELY 30 FEET OF 6" HOUSE CONNECTION)

- GUARD STATIONS (PALLET 64): 02
- MOBILE HYGIENE UNITS: 3 REQUIRED
- ADMIN CABINS (PALLET 100): 06
- 8X20 STRUCTURE: LAUNDRY STATION W/EXT. SINK
- TABLES AND UMBRELLAS: 32 SHOWN
- SITE BENCHES: 6

**SITE INFORMATION :**

**ADDRESS/LEGAL INFORMATION**  
 PIN NUMBER  
 LOT/PARCEL AREA (CALCULATED)  
 THOMAS BROTHERS GRID  
 ASSESSOR PARCEL NO. (APN)  
 TRACT  
 MAP REFERENCE  
 BLOCK  
 LOT  
 ARB (LOT CUT REFERENCE)  
 MAP SHEET

151-5A231 36  
 298,053.8 (sq ft)  
 PAGE 595 - GRID D2,D3  
 5492021900  
 RALPH ROGER'S ADDITION TO MINERAL PARK TRACT  
 M B 7-46/47  
 NONE  
 PT LT C  
 NONE  
 151-5A231

**JURISDICTIONAL INFORMATION**  
 COMMUNITY PLAN AREA  
 AREA PLANNING COMMISSION  
 NEIGHBORHOOD COUNCIL  
 COUNCIL DISTRICT  
 CENSUS TRACT #  
 LADBS DISTRICT OFFICE

NORTHEAST LOS ANGELES  
 EAST LOS ANGELES  
 HISTORIC HIGHLAND PARK  
 CD14 - KEVIN DE LEON  
 1837.01  
 LOS ANGELES METRO

**PLANNING AND ZONING INFORMATION**  
 ZONING  
 ZONING INFORMATION (ZI)

OS-1XL  
 ZI-2440 Historic Preservation Overlay Zone: Highland Park-Garvanza  
 ZI-2129 State Enterprise Zone: East Los Angeles  
 ZI-1117 MTA Right-of-Way (ROW) Project Area  
 ZI-2452 Transit Priority Area in the City of Los Angeles  
 ZI-2427 Freeway Adjacent Advisory Notice for Sensitive Uses  
 OPEN SPACE  
 YES  
 YES  
 NONE  
 YES  
 HIGHLAND PARK - GARVANZA  
 NONE  
 NONE  
 NONE  
 NO  
 NO  
 NONE  
 ADAPTIVE REUSE INCENTIVE AREA  
 AFFORDABLE HOUSING LINKAGE FEE  
 RESIDENTIAL MARKET AREA  
 NON-RESIDENTIAL MARKET AREA  
 TRANSIT ORIENTED COMMUNITIES (TOC)  
 RPA: REDEVELOPMENT PROJECT AREA  
 CENTRAL CITY PARKING  
 DOWNTOWN PARKING  
 BUILDING LINE  
 500 FT SCHOOL ZONE  
 500 FT PARK ZONE  
 MEDIUM  
 MEDIUM  
 TIER 3  
 NONE  
 NO  
 NO  
 NONE  
 NO  
 ACTIVE: HERMON PARK IN THE ARROYO SECO  
 ACTIVE: ARROYO SECO PARK  
 ACTIVE: HERMON PARK IN THE ARROYO SECO DOG PARK

**ASSESSOR AND ADDITIONAL INFORMATION**

ASSESSOR PARCEL NO. (APN)  
 OWNERSHIP (ASSESSOR)  
 AIRPORT HAZARD  
 COASTAL ZONE  
 FARMLAND AREA  
 URBAN AGRICULTURE INCENTIVE ZONE  
 VERY HIGH FIRE HAZARD SEVERITY ZONE  
 FIRE DISTRICT NO. 1  
 FLOOD ZONE  
 WATERCOURSE  
 METHANE HAZARD SITE  
 HIGH WIND VELOCITY AREAS  
 SPECIAL GRADING AREA  
 (BOE BASIC GRID MAP A-13372)  
 WELLS

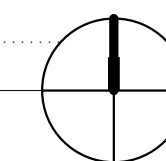
5492021900  
 L A CITY  
 NONE  
 NONE  
 NOT MAPPED  
 YES  
 NO  
 NO  
 OUTSIDE FLOOD ZONE  
 NO  
 NONE  
 NO  
 YES  
 NONE

**FIRE DEPARTMENT REQUIREMENTS**

1. TO PROVIDE ONE NEW PRIVATE FIRE HYDRANT, CENTRALLY LOCATED, AS PRE-APPROVED BY LAFD. GENERAL CONTRACTOR TO VERIFY FINAL LOCATION WITH LAFD.
2. LAFD APPARATUS WIDE ACCESS LANE THROUGH SITE, VIA ARROYO SECO PARKWAY ALLEY. MINIMUM WIDTH TO BE 17' CLEAR, AS PRE-APPROVED WITH LAFD. LANE TO REMAIN CLEAR AT ALL TIMES.
3. PROVIDE ONE SMOKE ALARM IN EACH SLEEPING UNIT, INTERCONNECTED WITH OTHER UNITS' SMOKE ALARMS SO THE ACTIVATION OF ONE WILL ACTIVATE ALL OTHERS. MAY BE INTERCONNECTED IN CLUSTERS WITHIN 6' OF EACH OTHER.
4. PROVIDE AN INTERIOR FIRE EXTINGUISHER IN EACH UNIT.
5. PROVIDE ADDITIONAL FIRE EXTINGUISHERS THROUGHOUT SITE, SPACED NOT MORE THAN 50 FEET APART. PROVIDE AN EXTERIOR USE CASING FOR EXTINGUISHER. DO NOT ATTACH TO PALLET STRUCTURES.

VICINITY PLAN

1/64" = 1'-0"

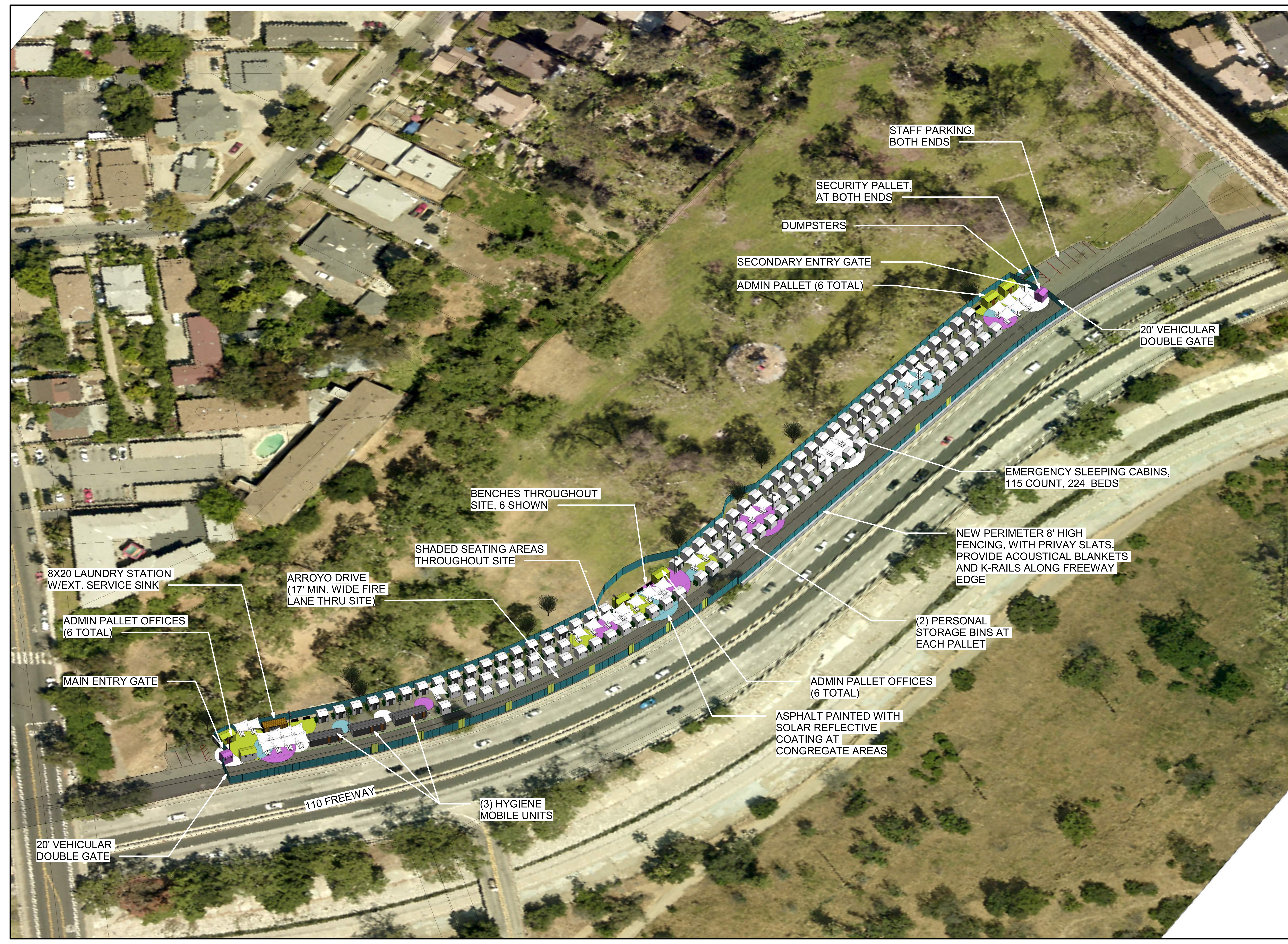


**VICINITY AND SITE DATA**

COUNCIL DISTRICT:	14	A001
DATE:	03/22/21	EV
DRAWN BY:	MQ	Scale: 1/64" = 1'-0"
CHECKED BY:		

**CD14 ARROYO SECO  
PALLET SHELTERS**  
 ARROYO SECO PARKWAY (ALLEY)  
 BETWEEN AVE 60 & AVE 64, 90042







## **ATTACHMENT 2**

**7235 Melrose Avenue Homeless Shelter NOE**



**COUNTY CLERK'S USE**

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

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

<b>LEAD CITY AGENCY AND ADDRESS:</b> City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, MS 939, Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b>  5
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<b>PROJECT TITLE:</b> CD 05 - 7253 Melrose Ave. Homeless Shelter – Hollywood	<b>LOG REFERENCE</b> <b>C.F. 20-0841</b>
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**PROJECT LOCATION:** 7253 Melrose Ave., Hollywood, CA 90046. The project site is located approximately one quarter of a mile west of the intersection of Melrose Ave. and La Brea Ave. in the Hollywood Community Plan Area in the City of Los Angeles Council District 5 (CD 5), Assessor's Parcel Number (APN) 5525-012-010, see *Figure 1 – Project Site Location*. *T.G. 593 D6, D7*

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT** The proposed project consists of the interior tenant improvements, a new lease, and the operation of a homeless shelter with approximately 62 beds in crisis and bridge housing approximately to 62 people, that will provide emergency shelter, living room areas, toilets, showers, laundry services, storage, food services, and case management to families and individuals experiencing homelessness. The nature of this project is to serve the local homeless community within the vicinity of the project. The purpose of the project is to provide emergency shelter for families and individuals experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The Project Site is approximately 5,990-square feet and is currently developed with 12,240-square foot (sf) 3-story building known as Villa Stanley West, which was a former board and care facility which is proposed to provide accommodations to people experiencing homelessness. The project includes up to 31 rooms with approximately two beds (accommodating approximately 62 occupants) experiencing homelessness. Project beneficiaries include the homeless community, the public and local businesses. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. (Please see the attached narrative for more details). The City Council determined the project is exempt under CEQA and approved this project on \_\_\_\_\_.

**CONTACT PERSON:** Maria Martin **TELEPHONE NUMBER:** 213-485-5753

<b>EXEMPT STATUS: (Check One)</b>	<u>CITY CEQA</u> <u>GUIDELINES</u>	<u>STATE CEQA</u> <u>GUIDELINES</u>	<u>CA PUBLIC</u> <u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27
<input checked="" type="checkbox"/> Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".			

**JUSTIFICATION FOR PROJECT EXEMPTION:** This project is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the project uses "Homeless Emergency Aid Program funds," it is exempt under Governor's order N-32-20. (see attached narrative).

**IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING**

<b>SIGNATURE:</b>  Maria Martin	<b>TITLE:</b> Environmental Affairs Officer Environmental Management Group	<b>DATE:</b>
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<b>FEE:</b> \$75.00 _____	<b>RECEIPT NO.</b>	<b>REC'D BY</b>	<b>DATE</b>
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DISTRIBUTION: (1) County Clerk (2) Agency Record

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## 1. EXEMPTION NARRATIVE

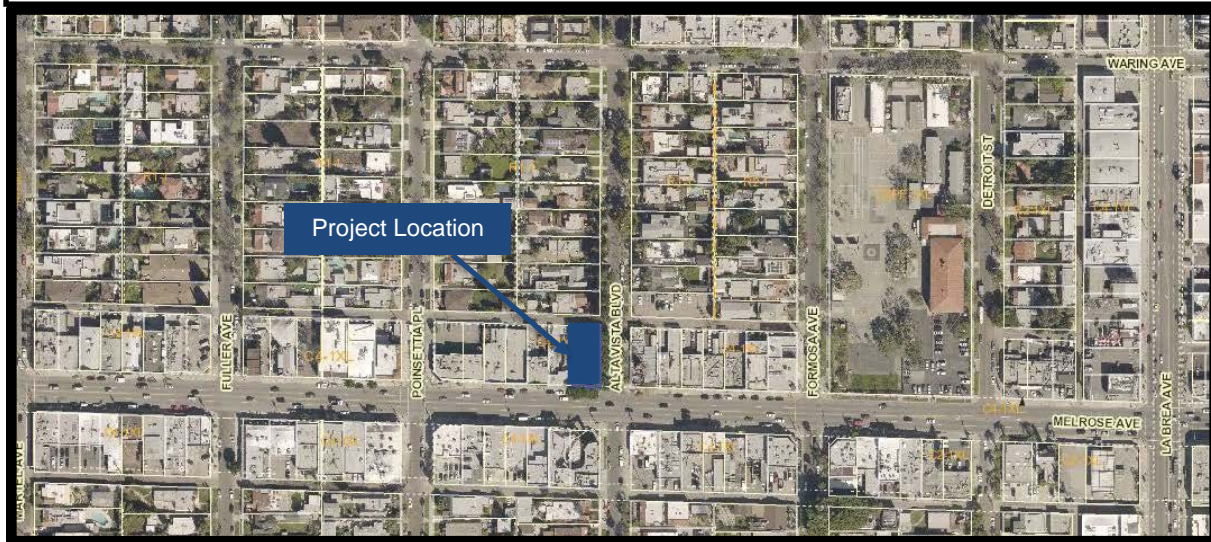
The project includes the interior tenant improvements to an existing board and care facility that will be converted into, then leased and operated as a homeless shelter with approximately 31 rooms that will provide emergency shelter with supporting spaces including living room areas, toilets, showers, laundry services, storage, food services, and case management to families and individuals experiencing homelessness.

The project location is on an approximately 5,990-sf, rectangular shaped parcel that is privately owned and developed as the 12,240-sf Villa Stanley East board and care facility in Hollywood. The Project Site is located in the Hollywood Community Plan Area in the City of Los Angeles Council District 5 (CD 5), 7253 Melrose Ave., Hollywood, CA 90046, and Assessor's Parcel Number (APN) 5525-012-010, see *Figure 1 – Project Site Location*. (City of Los Angeles Department of City Planning, 2020)

The project includes approximately 62 beds in crisis and bridge housing for approximately 62 people experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA, as well as a lease with the private owner for use of the site.

The project is zoned C4 with a Neighborhood Office Commercial land use designation. It is located in a board and care facility, approximately one quarter of a mile west of the intersection of Melrose Ave. and La Brea Ave. As shown in Figure 1, below, there are qualified urban uses that are adjacent to the site. The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses. The site is bounded on the south, east and west by other neighborhood commercial uses, and to the north by low density residential uses. The project site is located within an urban area on a parcel that is currently developed as a board and care facility. The site is considered a qualified residential and/or commercial urban use because it is an adult residential facility that provides residential housing and it does so as a commercial operation. The parcels that surround the site are also qualified urban uses — LALA's Argentine Grill restaurant on the east, Sugar Taco restaurant on the west, and The Parlor restaurant on the south, with a residential building located at 713 N. Alta Vista Blvd just to the north of the property. (City of Los Angeles Department of City Planning, 2021)

**Figure 1**  
**Project Site Location Map**



## I. PROJECT HISTORY: HOMELESS SHELTER CRISIS AND EMERGENCY

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

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

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

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

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Commander Dominic H. Choi, 2019). This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more

rigorous LAPD data collection methodologies, but is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

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

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

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

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

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



causes (Morrison, 2009).

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

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

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

## **B. Unexpected and Unabated Dramatic Surge in Homelessness**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

(Mayor Eric Garcetti, 2020)

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

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

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

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.

## **II. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW**

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

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

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

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

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

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

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

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

**B. The Project is Exempt under the Governor’s Executive Order No. N-32-20, Suspending CEQA**

On March 18, 2020, Governor Newsom signed and issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020) suspending CEQA and the CEQA Guidelines’ requirements “for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89, signed on March 17, 2020.” The Governor noted that “strict compliance with the various statutes and regulations specified in this order would prevent, hinder, or delay appropriate actions to prevent and mitigate the effects of the COVID-19 pandemic.” Because this project qualifies for and will uses Homeless Emergency Aid Program funds for at least a portion of the work at the site,” it is exempt from CEQA under the Governor’s suspension order.

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

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

## **1. City of Los Angeles Declaration of a Shelter Crisis**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The project provides approximately 31 rooms which allow for presence of partners. This project is pet friendly. Participants are allowed to bring their pets to the shelter and live with them inside their room. There is no pet play area onsite. The project has storage within each room for personal possessions. The project is designed to provide privacy to participants by providing each family or individual with their own room. There are private living quarters with both private or communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for possessions, and management and design for individuals' privacy. All of the City's emergency shelters, including



this project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered crisis and bridge housing that is “low barrier” within the meaning of Government Code Section 65660 and AB 1197.

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

### **3. The Project Complies with Government Code Section 65662**

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

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

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

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

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



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

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

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

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

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

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

consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

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

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

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

#### **4. The Project is in a Qualified Location Under AB 1197**

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The Department of City Planning determined on February 17, 2021, the site located at 7253 W. Melrose Avenue meets this requirement because it is developed with a qualified urban use and at least 75% of the perimeter of the site is surrounded by qualified urban uses. The site consists of one rectangular shaped lot with an area of approximately 5,990 square feet having frontages along Melrose Avenue and Alta Vista Boulevard. The site is zoned C4-1XL which is a non-residential zone that allows for multifamily uses. The site is currently developed with an existing multi-family residential building. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are residential uses to the north of the site and commercial uses to the east, south, and west of the site. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2021) Therefore, the Project site is surrounded by urban uses and is considered a qualified location under AB 1197.

#### **5. The Project Involves Qualified Funding Under AB 1197**

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The project is funded, at least in part, through State of California Homeless Housing, Assistance and Prevention Grant Program (HHAP) for the improvements. The City also has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources

Code Section 21080.27(a)(2)(A), the funding requirement is met.

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

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA “any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles.” This project involves a tenant improvements and operating an emergency shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles, and qualify for exemption from CEQA under AB 1197.

**7. AB 1197 Conclusion**

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

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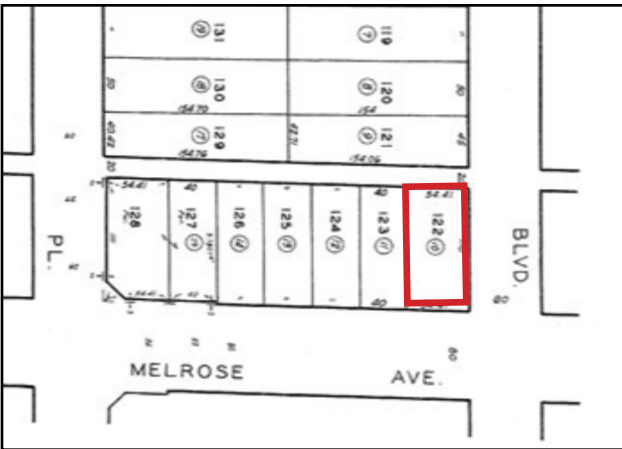
Attachment

Project Site Plan



# SITE DATA - SHELTER USE SUMMARY

7253 MELROSE AVE, LOS ANGELES, CA 90046



## Shelter Use Options:

- Eligible for Homeless Shelter per Sec. 12.80 if the property is owned or leased by the City of Los Angeles. Per 12.80, there is no limit as to number of beds or persons.
- Eligible for Homeless Shelter per Sec. 12.81 if operated by religious institution or a non-profit, charitable organization and that institution or organization owns or leases the property. Per 12.81, there is no limit as to number of beds or persons.
- Not Eligible for Homeless Shelter per Sec. 14.00A8 –Public Benefit for Shelters for the homeless as defined by 12.03. Per 14.00A8, maximum number of beds is 30 beds. Requires City Planning Action.
- Eligible for by-right Homeless Shelter as defined by 12.03. Per 12.03, maximum number of beds for a by-right Shelter is 30 beds.

<b>Council District:</b>	5 - Paul Koretz	<b>Lot Size:</b>	5,989 SF
<b>Supervisory District:</b>	3 - Sheila Kuehl	<b>Year Built:</b>	1969
<b>SPA:</b>	4 - Metro	<b>Non- Ductile:</b>	No
<b>Owner:</b>	La Brea Gardens Property, LLC	<b>Soft-Story Retrofit:</b>	No
<b>Zoning:</b>	C4-1XL	<b>URM:</b>	No
<b>Building Size:</b>	12,240 SF	<b>Building Type:</b>	IIIB/VB

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Initial Assessment

Proposed Shelter Plan

Certificate of Occupancy

Site Photos

# INITIAL ASSESSMENT

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**Land Use:** Zoned C4-1XL. Proposed Emergency Shelter for the Homeless use allowed per Section 12.80 and 12.81 LAMC.

**Physical Assessment:** The property includes a three-story, 12,240 SF former assisted living facility built in 1969 containing 31 client guest rooms (dual occupancy), shared jack and jill restrooms, private office, dining room, elevator, client community room and large commercial kitchen. The site includes small exterior areas at both the rear and southeast corner of the lot. The building shows significant signs of deferred maintenance throughout, including many of the major systems such as the roof, plumbing, electrical and HVAC. Rehabilitation and modernization of these systems will be required, including a full re-pipe of the building interior and main sewer line, replacement of critical HVAC systems and upgrades to obsolete electrical panels. The elevator system will also be upgraded including replacing elevator doors and adding emergency safety mechanisms such as emergency phone systems and lighting and ADA code requirements.

Some of the more costly fire/life safety improvements such as fire alarms, fire sprinkler systems, and fire-rated egress corridors are already present to some degree in the building. However, the systems are dated and in need of repair to meet current fire/life safety standards.

The fire sprinkler system is over 50 years old, triggering a code-required replacement of all original fire sprinkler heads. Additionally, the fire alarm system will need upgrades including adding horns and strobe lights throughout the building and a new panel. Smoke detectors will need to be installed in series and connected to the fire alarm.

The property will require upgrades in order to meet current ADA requirements. The ground floor entrance is below-grade with two steps to entry requiring an accessible ramp for access in and out of the building. Additionally, modifications will need to be made within the building including providing two ADA accessible sleep rooms and bathrooms. Four rooms will require ADA audio/visual enhancements. There is an existing Accessible Parking Zone placed directly in front of the property

providing an accessible parking space and clear path to the entrance.

The scope includes replacement of all exterior-facing windows with new vinyl windows, as well as clean, seal and repair damage to the roof. Additionally, holes in the exterior stucco will be patched and the entire building exterior will be re-painted. These improvements will enhance the moisture and thermal protection of the building and eliminate any existing deficiencies.

The property owner is responsible for the renovation at the owner's sole cost.

**Site Location:** Located on a commercial corridor at the corner of Melrose Ave and N. Alta Vista Blvd in Hollywood. Close proximity to the Metro Red Line and serviced by local transportation and retail/ services located in Hollywood. This is an underserved area for homelessness with a very strong need. Despite frontage on Melrose Avenue, the orientation and location of the building provides some privacy. Additionally, the local community has prior experience with a higher-acuity homeless population at this site given the building's prior use as assisted living for LA County Dept. of Mental Health clients for the past 30 years.

**Schematic Design:** The proposed design includes a reception office, security office, full ADA client/ intake bathroom, Staff/ICMS Offices (x3), staff breakroom and bathroom, large dining area, client community room (x2), food prep room, ADA mobility room (x2), client rooms with audio/visual communication features (x4), client sleeping rooms and restrooms, client and programmatic storage space, and laundry room. A small, fenced area will be included at the rear of the property to increase the exterior space available for clients.

The design is intended for individuals. The layout includes a total of **60 beds** with four beds designated as ADA accessible beds. All of the beds are distributed across 30 client sleep rooms, with each room set for dual occupancy. This distribution of beds allows for flexibility in mitigating and addressing the possible spread of COVID-19 on-site. While much of the programmatic and case management space is on the ground floor, special consideration was made to include important programmatic space on the second and third floors as well.

The second floor and third floor each feature a staff office space which with a fire-rated window to allow for maximum line of sight for staff on each floor while maintaining the required fire rating. Additionally, the second floor will feature a secondary multi-purpose room for clients to relax and socialize positioned adjacent to the newly created staff office.

**Leasing Costs:** Available for lease at \$35,000 per month (NNN); 5-year term with 5-year extension option.

Base Rent:  $12,240 \text{ SF} \times \$2.86/\text{SF} = \$35,000/\text{month}$

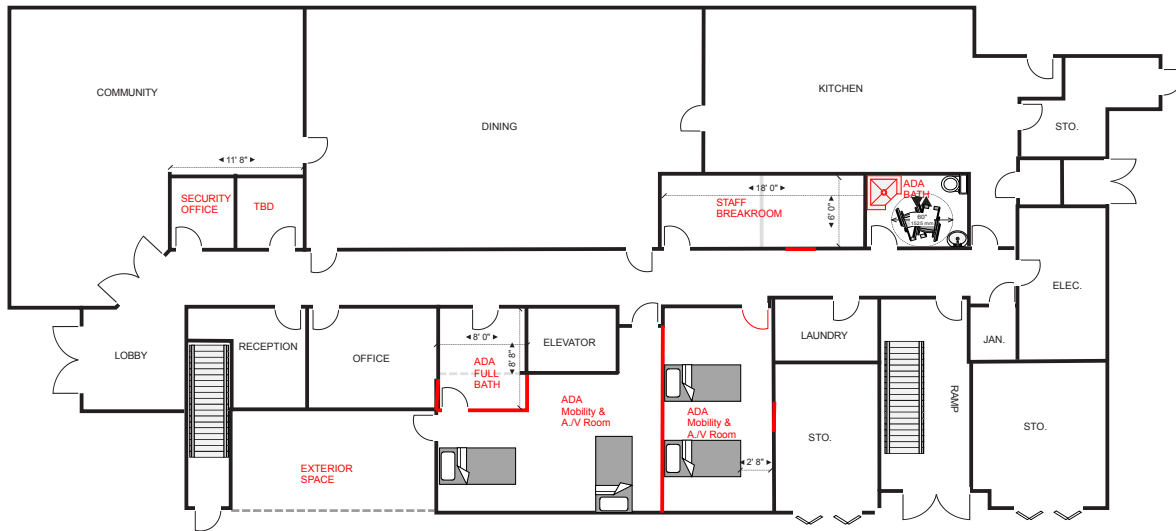
NNN Charges:  $12,240 \text{ SF} \times \$0.25/\text{SF} = \$3,094/\text{month}$

Total =  $\$38,094/\text{month} (\$3.11/\text{SF})$

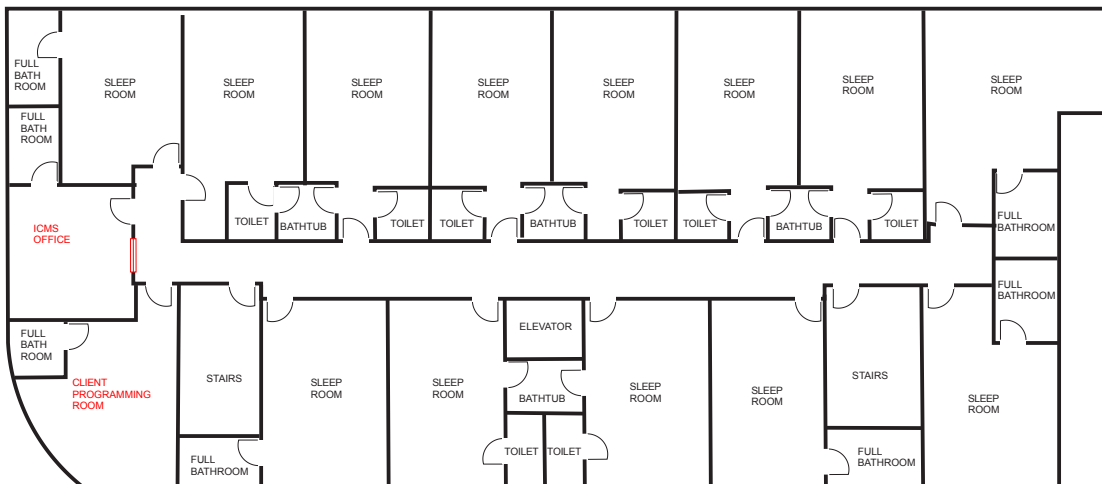
Off Site Parking (\*handled outside of lease, direct operator contract):  $6 \text{ tandem surface spaces} \times \$300/\text{space} = \$1,800/\text{month}$

# PROPOSED SHELTER PLAN

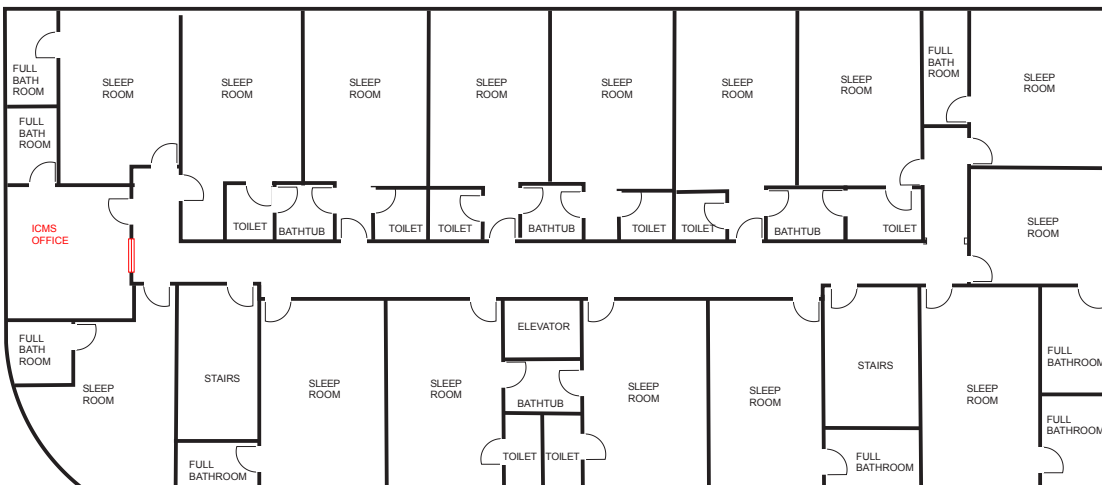
FLOOR 1 - 4 ADA Beds



FLOOR 2 - 26 Beds



FLOOR 3 - 30 Beds



TOTAL: 60 Beds



# CERTIFICATE OF OCCUPANCY



Address of  
Building

7253 Melrose Avenue  
CITY OF LOS ANGELES

## CERTIFICATE OF OCCUPANCY

**NOTE:** Any change of use or occupancy must be approved by the Department of Building and Safety. This certifies that, so far as ascertained by or made known to the undersigned, the building at the above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses, Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Licensing Law—for falseing occupancies:

Issued

11-2-70

Permit No. and Year

IA 97606/69

Two story type V/III, 44'2" X 99'10" Home for the Aged and parking. 31 guest rooms. 30 required parking spaces provided. D-3, G-2, G-1, J-1 Occupancy.

Owner

Adolph Goldfarb

Owner  
Address

1342 North Fuller  
Los Angeles, California

By D. MILLER va

















**ATTACHMENT 3**

**317 N. Madison Safe Sleeping Shelter NOE**

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

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

<b>LEAD CITY AGENCY AND ADDRESS:</b> City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, MS 939, Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b>  13
<b>PROJECT TITLE:</b> CD 13 – 317 N. Madison Ave. Safe Sleeping Shelter – Wilshire	<b>LOG REFERENCE</b> <b>C.F. 20-0841</b>

**PROJECT LOCATION:** 317, 321, 327, 333, 339, and 345 N. Madison Ave., Los Angeles, CA 90004.  
 Located just west of the intersection of Beverly Blvd. and Westmoreland Ave. in the Wilshire Community Plan Area, in the City of Los Angeles, Council District 13 (CD 13), Assessor's Parcel Number (APN) 5501-001-800, see *Figure 1 – Project Site Location*.  
T.G. 594 A7

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT** The proposed project consists of minor improvements to a surface parking lot, a new lease, and the operation of a homeless safe sleeping shelter site with approximately 75 sleeping beds/spaces in crisis and bridge housing for approximately 75 people, that will provide emergency shelter, toilets, showers, storage, food services, and case management to families and individuals experiencing homelessness. The nature of this project is to serve the local homeless community within the vicinity of the project. The purpose of the project is to provide emergency shelter for families and individuals experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The project site is approximately 32,000-square feet and is currently developed as a Pacific Bell utility lot. The project includes up to 75 sleeping beds/spaces, accommodating approximately 75 occupants experiencing homelessness. Project beneficiaries include the homeless community, the public and local businesses. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. (Please see the attached narrative for more details). The City Council determined the project is exempt under CEQA and approved this project on \_\_\_\_\_.

**CONTACT PERSON:** Maria Martin **TELEPHONE NUMBER:** 213-485-5753

<b>EXEMPT STATUS: (Check One)</b>	<u>CITY CEQA</u>	<u>STATE CEQA</u>	<u>CA PUBLIC</u>
	<u>GUIDELINES</u>	<u>GUIDELINES</u>	<u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27
<input checked="" type="checkbox"/> Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".			

**JUSTIFICATION FOR PROJECT EXEMPTION:** This project is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the project uses "Homeless Housing, Assistance and Prevention (HHAP) program funds," it is exempt under the Governor's Executive Order N-32-20. (see attached narrative).

**IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING**

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

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

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## 1. EXEMPTION NARRATIVE

The proposed Project consists of minor improvements, to an existing Pacific Bell owned surface lot that will be converted into, then leased and operated as a homeless safe sleeping shelter with approximately seventy-five (75) spaces that will provide emergency shelter with supporting services including, toilets, showers, storage, food services, and case management to families and individuals experiencing homelessness. There will be approximately seventy-five (75) 10-foot (ft) x 15-ft tenting spots, portable toilets and hand washing stations, garbage dumpsters, a new 3-foot wide pedestrian entry gate in existing fencing, a pop-up tent for security, an existing building that will be used for storage, an existing garage structure, an existing covered porch to be used for outside seating, existing roller gates, an area allocated for a pop-up tent for miscellaneous uses, five (5) existing parking spaces for staff, and a staff portable toilet and hand wash station. There will be new overhead electrical service, an existing water connection will be reactivated, existing perimeter fencing will be repaired, and a new perimeter 8foot high chain link fence will be installed with new privacy fabric.

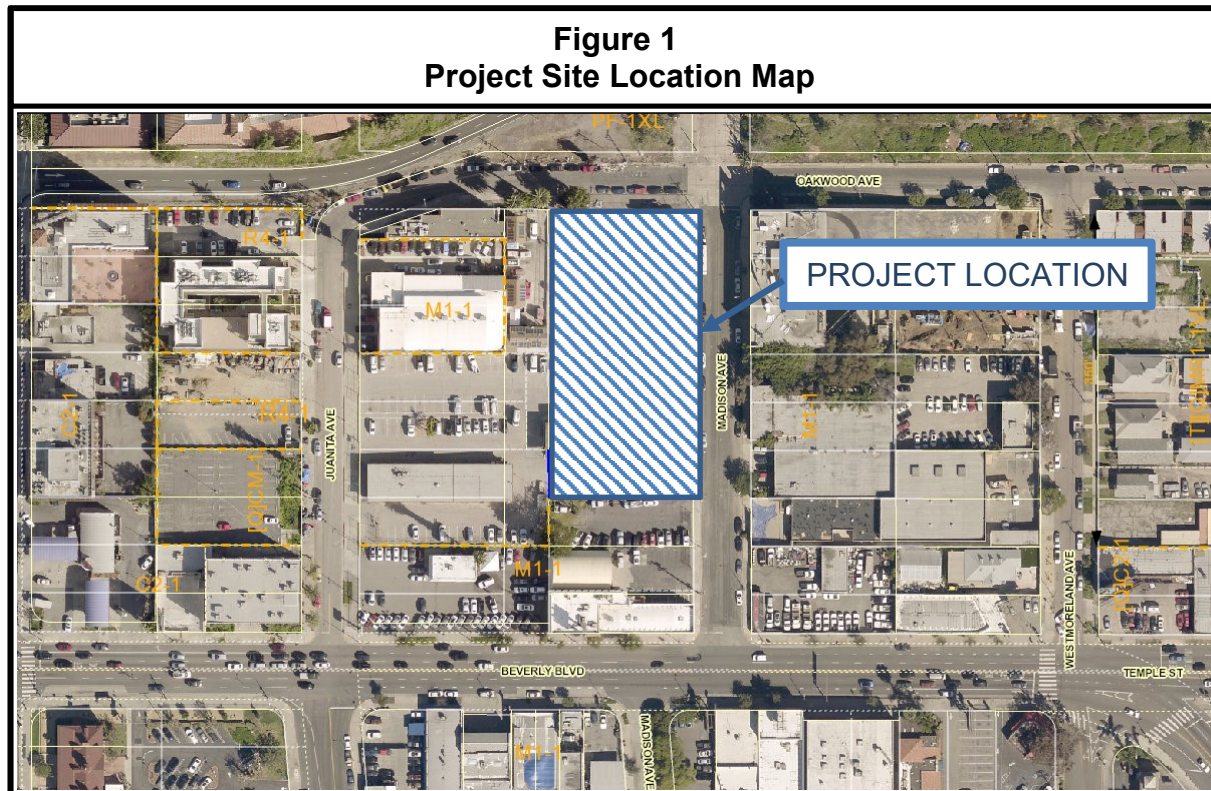
The Project location includes six (6) lots on an approximately 32,000-square foot (sf), irregularly shaped parcel that is privately owned and developed as a Pacific Bell utility lot. There are five (5) existing parking spaces on the site. Addresses of the six lots include 317, 321, 327, 333, 339, and 345 N. Madison Ave., Los Angeles, CA 90004, and is located in the Wilshire Community Plan Area of the City of Los Angeles, Council District 13 (CD 13). Assessor's Parcel Number (APN) 550-100-1800, see *Figure 1 – Project Site Location*. (City of Los Angeles Department of City Planning, 2021)

The Project includes approximately seventy-five (75) beds in crisis and bridge housing for approximately seventy-five (75) people experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. The operations of the Project will include a total of twenty (20) employees who work three (3) shifts throughout the day. Toilets will be serviced up to five (5) times a week, there will be food deliveries approximately three (3) times per day, and case management to families and individuals experiencing homelessness. Persons experiencing homelessness are invited to enter the CD 13 317 N. Madison Ave. Safe Sleeping Shelter with their tent, and any other belongings they can fit in a designated 10-foot by 15-foot area. The goal of this program is to meet clients where they are and provide a safe and legal space to rest undisturbed. By creating a stable environment and providing access to basic needs, clients will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA, as well as a lease with the private owner for use of the site.

The project is zoned CM1 with a Commercial Manufacturing land use designation. It is located on a Pacific Bell utility lot, approximately one quarter of a mile west of the intersection of Beverly Blvd. and Westmoreland Ave. As shown in Figure 1, below, there are qualified urban uses that are adjacent to the site. The parcel is an infill site that is bounded by parcels that are developed with a combination of qualified urban uses. The site is bounded on the south, west, and east by commercial uses, and to the north by a transit public facility use. The project site is located within an urban area on a parcel that is currently developed with a utility lot. The site is considered a qualified residential and/or commercial urban use because it is a utility lot, and it does so as a



commercial operation. The parcels that surround the site are also qualified urban uses — PATH on the east, MZ Collision Center on the west, and Dewey Pest Control on the south, with a public facilities parcel just to the north of the property. (City of Los Angeles Department of City Planning, 2021)



**I. PROJECT HISTORY: HOMELESS SHELTER CRISIS AND EMERGENCY**

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

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately 0.78 percent of the City’s population (Los Angeles Homeless Services Authority, 2018).

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

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



on average than other patients (Salit, Hospitalization Costs Associated with Homelessness in New York City, 1988).

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

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

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

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

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

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

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

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

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

## **B. Unexpected and Unabated Dramatic Surge in Homelessness**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted “in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials.”

(Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

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

(Mayor Eric Garcetti, 2020)

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

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

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

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources which presents an emergency as defined by CEQA as explained below. Furthermore, the State has created additional CEQA exemptions applicable in the City of Los Angeles concerning homelessness and homeless shelters.



## II. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

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

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

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

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

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

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

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

### B. The Project is Exempt under the Governor’s Executive Order No. N-32-20, Suspending CEQA

On March 18, 2020, Governor Newsom signed and issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020) suspending CEQA and the CEQA Guidelines’ requirements “for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89, signed on March 17, 2020.” The Governor noted that “strict compliance with the various statutes and regulations specified in this order would prevent, hinder, or delay appropriate actions to prevent and mitigate the effects of the COVID-19 pandemic.” Because this project qualifies for and will use Homeless Emergency Aid Program funds



for at least a portion of the work at the site,” it is exempt from CEQA under the Governor’s suspension order.

### **C. The Project is Exempt Pursuant to AB 1197 Codified at PRC Section 21080.27**

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

#### **1. City of Los Angeles Declaration of a Shelter Crisis**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The City’s shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the

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

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

The project provides approximately 75 sleeping bed/spaces which allow for presence of partners. This project is pet friendly. Participants are allowed to bring their pets to the shelter and live with them inside their room. There is no pet play area onsite. The project has storage within each sleeping area for personal possessions. The project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

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

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

### 3. The Project Complies with Government Code Section 65662

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

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

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

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

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



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

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

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

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

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

**Homeless Management Information System.** Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management Information System designed to coordinate program participant intake, assessment, and referrals. These are required by LAHSA's Scope of Required Services and Program Standards. The City's emergency shelters use such a system in the Los Angeles Continuum of Care Homeless Management Information System (HMIS). In 2001, Congress directed the U.S. Department of Housing and Urban Development (HUD) to ensure the collection of more reliable data regarding the use of homeless programs. HUD



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

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

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

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

#### **4. The Project is in a Qualified Location Under AB 1197**

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (PRC § 21080.27(a)(2).) The project is considered an infill site because the site has been developed with, and its perimeter is surrounded by, qualified urban uses.

The Department of City Planning determined on March 22, 2021, the site located at 317 N. Madison Avenue meets this requirement because it is developed with a qualified urban use and at least 75% of the perimeter of the site is surrounded by qualified urban uses. The site is zoned CM-1 and consists of six lots that comprise one irregularly shaped parcel with an area of approximately 32,000-sf with frontage along N. Madison Ave.

The parcel is an infill site that is bounded by parcels that are developed with a combination of qualified urban uses. Further, the site itself is considered a qualified residential and/or commercial urban use because it is a public utility use and it does so as a commercial operation. The site is bounded on the south, west, and east by commercial uses, and to the north by a transit public facility use. The parcels that surround the site are also qualified urban uses — PATH on the east, MZ Collision Center on the west, and Dewey Pest Control on the south, with a public facilities parcel just to the north of the property. The project site is located within an urban area on a parcel that is currently developed with a public utility/commercial use. Therefore, the site meets the definition of infill site. (City of Los Angeles Department of City Planning, 2021) Therefore, the Project site is surrounded by urban uses and is considered a qualified location under AB 1197.

### **5. The Project Involves Qualified Funding Under AB 1197**

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The project is funded, at least in part, through State of California Homeless Housing, Assistance and Prevention Grant Program (HHAP) for the improvements. The City also has determined that the Project is a homeless shelter project that would qualify for the other homeless shelter funding sources identified in AB 1197, and that those funds may be applied to this Project if such funding becomes available, which further qualifies this Project for the exemption under AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement is met.

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

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA “any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles.” This project involves minor improvements to an existing surface lot, that will be converted into, then leased and operated as a emergency homeless safe sleeping shelter, as described above, which is located in the City of Los Angeles. The City will provide funding and enter into contracts with a qualified service provider and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles, and qualify for exemption from CEQA under AB 1197.

### **7. AB 1197 Conclusion**

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

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Attachment

Project Site Plan





OAKWOOD AVE

**SAFE SLEEPING SITE**  
APPROX. 32,000 SQ. FT.

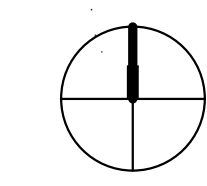
**P.A.T.H. COMPLEX**

JUANITA AVE

MADISON AVE

BEVERLY BLVD

SITE PLAN  
1" = 30'-0"



CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

GARY LEE MOORE, PE, ENV SP



**SAFE SLEEPING SITE  
TEST FIT**

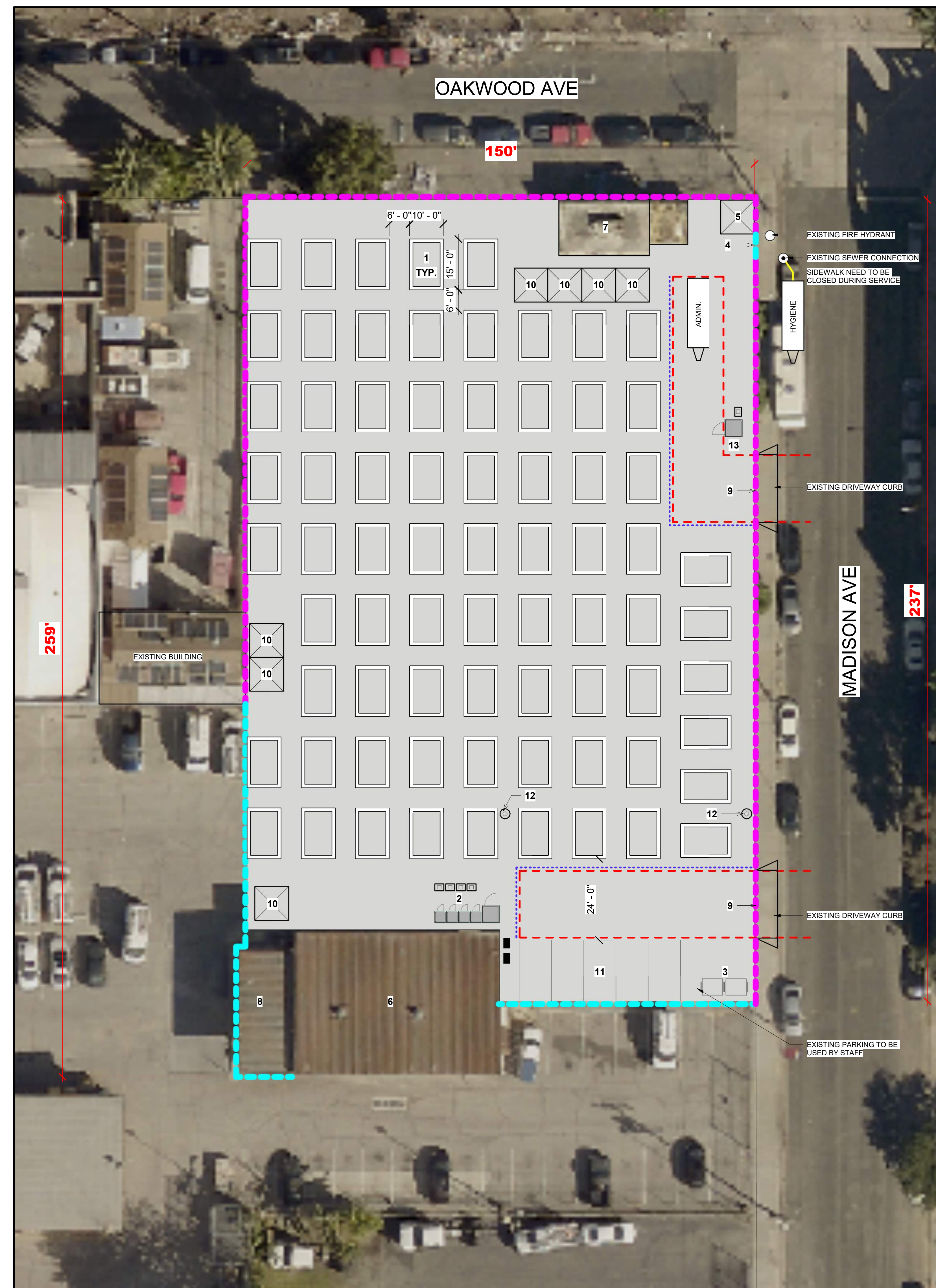
CITY ENGINEER

VICINITY PLAN

COUNCIL DISTRICT:	13	A001
DATE:	03/03/21	
DRAWN BY:	AJK	EV
CHECKED BY:		
		Scale: 1" = 30'-0"







**ARCHITECTURAL KEYNOTES:**

- GSD TO PAINT OUTLINES OF 10'X15' TENTING SPOTS, TYP. FOR 73.
- PORTA POTTIES AND HAND WASH STATIONS.
- AREA ALLOCATED FOR DUMPSTERS, PROVIDED BY THE CITY.
- NEW 3' WIDE PEDESTRIAN ENTRY GATE IN EXISTING FENCING.
- POP UP TENT FOR SECURITY.
- EXISTING GARAGE STRUCTURE.
- EXISTING STRUCTURE TO BE USED FOR STORAGE.
- EXISTING COVERED PORCH, TO BE USED FOR OUTDOOR SEATING.
- EXISTING ROLLER GATES, TO REMAIN.
- AREA ALLOCATED FOR POP-UP TENT FOR MISC. USES, SUCH AS ADMIN SERVICES OR REPOSE AREA.
- EXISTING PARKING, TO REMAIN FOR STAFF.
- EXISTING LIGHT POST TO REMAIN.
- STAFF PORTA POTTY AND HAND WASH STATION

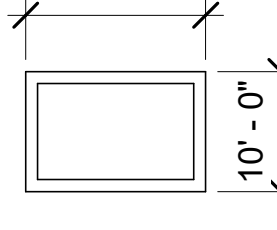



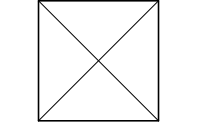
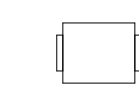






**PLUMBING NOTES:**

- REACTIVATE THE WATER ON THE SITE
- GSD SHALL CHECK CONDITION OF EXISTING PRV
- GSD SHALL CHECK EXISTING HB (NEAR UTILITY BUILDING) CONDITION.
- GSD SHALL RUN 1" CW TO THE NEW HB LOCK KEY LOCATED NEAR FENCE AND HYGIENE TRAILER LOCATION.

**GENERAL NOTES:**

- EXISTING PERIMETER FENCING, REPAIR CHAIN LINK AS NECESSARY, AND PROVIDE NEW PRIVACY FABRIC.
- NEW PERIMETER FENCING, 8" HIGH CHAIN LINK FENCE. PROVIDE PRIVACY FABRIC.
- ALL PARKING CONCRETE WHEEL STOPS TO BE REMOVED. RE-USE WHEEL STOPS AS ROAD DIVIDERS AT HYGIENE MOBILE TRAILER PATH. ALL REMAINING WHEEL STOPS TO BE STORED ON SITE.

**TYPE DESCRIPTION QUANTITY**

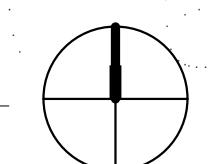
TYPE	DESCRIPTION	QUANTITY
	<b>INDIVIDUAL TENT SPACES</b> (PAINTED LINE 12" THICK, COLOR WHITE)	<b>73 TOTAL</b>
	<b>PORTABLE RESTROOM</b> (STANDARD UNIT)	<b>4 TOTAL</b>
	<b>PORTABLE RESTROOM</b> (ADA UNIT)	<b>2 TOTAL</b>
	<b>HANDWASHING STATION</b>	<b>5 TOTAL</b>
	<b>10' X 10' TENTS</b> TO BE PROVIDED BY OTHERS	<b>8 TOTAL</b>
	<b>GARBAGE DUMPSTER</b>	<b>2 TOTAL</b>
	<b>SYRINGE KIOSK</b> TO BE PROVIDED BY OTHERS	<b>2 TOTAL</b>
	<b>HYGIENE</b> HYGIENE MOBILE TRAILER	<b>1 TOTAL</b>
	<b>ADMIN.</b> ADMIN. RV TRAILER	<b>1 TOTAL</b>
	<b>EXISTING FENCE AND GATES</b>	
	<b>NEW FENCE AND GATES</b>	<b>APPROX. 200 LF</b>
	<b>RELOCATED WHEEL STOPS</b>	

**ELECTRICAL NOTES:**

**SITE ELECTRIC POWER**

- THERE ARE TWO EXISTING METERS ON THE SITE THAT ARE BOTH DEENERGIZED, AND ARE LOCATED AT THE EXTERIOR OF THE NORTHERN BUILDING. LADWP HAS REMOVED THEIR METER AND OVERHEAD ELECTRIC SERVICE. THERE IS NO POWER TO THE SITE. COMBINATION TO SWITCHGEAR LOCK IS 1967. LINE UP THE COMBINATION WITH THE BLACK TICK MARKS.
  - GSD SHALL INSPECT THE EXISTING 100A METER MAIN PANEL (120/240V), AND EXISTING 400A METER SWITCHBOARD (120/240V). GSD SHALL REPORT TO BOE WHETHER THE EXISTING INFRASTRUCTURE (WEATHERHEADS, PANELS, SWITCHBOARDS, HANDLE LOCKS, ETC...) CAN BE REUSED, REPAIRED, OR WILL NEED TO BE REPLACED; IN PREPARATION FOR THE NEW OVERHEAD ELECTRIC SERVICE FOR THE SITE.
  - GSD SHALL INSPECT THE TWO EXISTING SUB-PANELS IN THE BUILDING (PANEL "A" AND PANEL "X"), AND REPORT TO BOE WHETHER EITHER OF THE TWO SUB-PANELS CAN BE REUSED, REPAIRED, OR WILL NEED TO BE REPLACED.
  - GSD SHALL TERMINATE AND MAKE SAFE ALL CIRCUITS THAT ARE NOT USED. THIS WILL INCLUDE CAPPING AND DEAD ENDING ALL CONDUCTORS FOR CIRCUITS THAT ARE NOT BEING USED AT THE SUBPANEL.
  - GSD SHALL MAKE SAFE ALL ELECTRICAL INFRASTRUCTURE IN AND AROUND THE EXISTING BUILDING. TO INCLUDE INSTALLATION OF JUNCTION BOX COVERS, JUNCTION BOXES, LIGHTING SWITCHES, THERMOSTATS, REPAIRING OR DEMOLISHING FITTINGS OR CONNECTIONS THAT MAY CREATE A SAFETY HAZARD.
  - GSD SHALL REPLACE BREAKERS IN THE PANELS, SUBPANELS, AND SWITCHBOARD; AS NEEDED FOR A COMPLETE AND OPERATING ELECTRICAL SYSTEM.
- EXISTING BUILDING
  - THERE IS AN EXISTING BUILDING ON THE NORTHEAST OF THE SITE THAT HAS TWO SEPARATE DOORS FOR TWO SEPARATE SPACES.
    - GSD SHALL COORDINATE WITH THE MECHANICAL ENGINEER TO DETERMINE IF THE EXISTING ROOF MOUNTED HVAC UNIT WILL BE REUSED. INSPECT AND REPAIR THERMOSTATS AS NEEDED IF THE EXISTING HVAC UNIT IS TO BE RETURNED TO OPERATION.
    - ALL INTERIOR LIGHTING SHALL BE CLEANED, REPAIRED, RESTORED TO USE. ALL EXISTING FIXTURE BULBS (TO INCLUDE FLUORESCENT), SHALL BE REPLACED WITH LED BULBS.
    - ALL EXTERIOR LIGHTING SHALL BE CLEANED, REPAIRED, AND RESTORED TO USE. ALL EXISTING FIXTURE BULBS SHALL BE REPLACED WITH LED BULBS.
    - GSD SHALL REPAIR AND MAKE OPERABLE ALL EXISTING RECEPTACLES AND LIGHT SWITCHES INSIDE OF THE BUILDING.
    - GSD SHALL CUT, GRIND, AND MAKE SAFE ALL EXISTING BOLTS PROTRUDING FROM THE GRADE, THAT WAS PREVIOUSLY USED FOR RACK MOUNTED COMMUNICATIONS EQUIPMENT.
    - GSD SHALL INSTALL 5 NEW DUPLEX RECEPTACLES, SPACED ROUGHLY 1 FEET APART, USING A MINIMUM OF TWO CIRCUITS, AT 42" AFF TO THE CENTER. THESE RECEPTACLES WILL BE USED FOR THE FUTURE PHONE/LAPTOP/TABLET CHARGING STATION. COORDINATE WITH THE ARCHITECT FOR LOCATION.
- EXISTING SITE POLE LIGHTS
  - THERE ARE TWO EXISTING SITE POLE LIGHTS. GSD SHALL REPAIR, RELAMP WITH LED BULBS, AND RESTORE THE TWO EXISTING SITE LIGHT POLES TO OPERATION.

OPTION 01 TEST FIT-317 MADISON AVE  
1/16" = 1'-0"



BUREAU OF ENGINEERING

DEPARTMENT OF PUBLIC WORKS

CITY OF LOS ANGELES

GARY LEE MOORE, PE, ENV SP

CITY ENGINEER

SITE PLAN

SAFE SLEEPING SITE TEST FIT

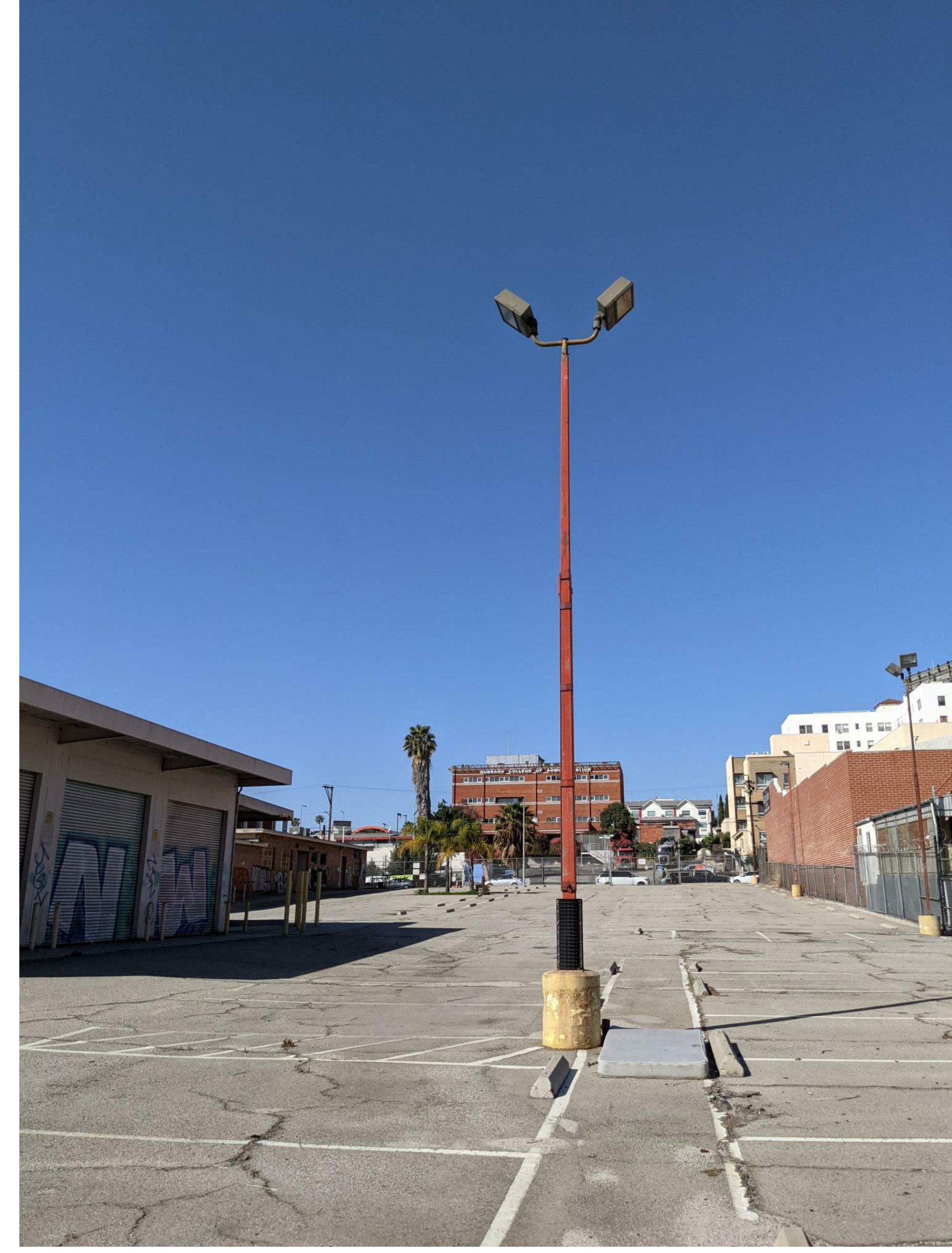
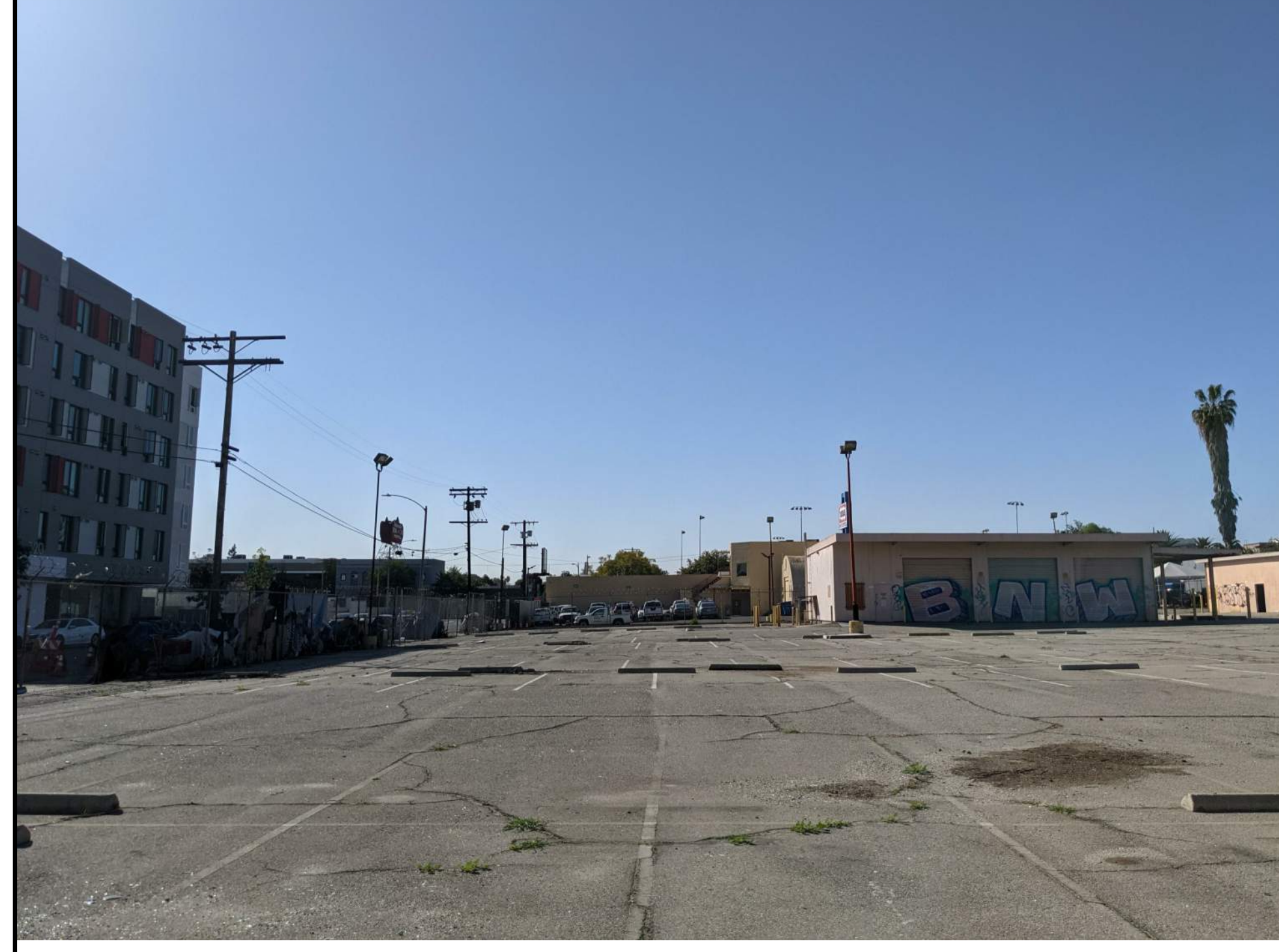
A Bridge Home

ENGINEERING CITY OF LOS ANGELES

COUNCIL DISTRICT: 13  
DATE: 03/03/21  
DRAWN BY: AJK  
CHECKED BY: EV

A101  
Scale: 1/16" = 1'-0"





CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING



SITE PHOTOS  
COUNCIL DISTRICT: 13  
DATE: 03/03/21  
DRAWN BY: AJK  
CHECKED BY: EV  
Scale:

CITY ENGINEER  
SAFE SLEEPING SITE  
TEST FIT

