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GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

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

<http://eng.lacity.org>

September 2, 2021

The Honorable Nury Martinez
President
Los Angeles City Council

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

**CRISIS AND BRIDGE HOUSING FACILITIES - CD 9 TINY HOME VILLAGE HOMELES
SHELTER ON ASSERSON PARCEL NUMBER (APN) 5118-015-900 AND CD 6 TINY
HOME VILLAGE HOMELESS SHELTER AT 9700 SAN FERNANDO ROAD (C.F. 20-
0841) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF
EXEMPTION (NOEs)**

Dear President Martinez and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the construction of two bridge housing facilities, tiny home village homeless shelters, to provide crisis shelter services on Assessor Parcel Number (APN) 5118-015-900 in Council District 9 and at 9700 San Fernando Road in Council District 6.

RECOMMENDATION

Staff recommends that Council determine the Crisis and Bridge Housing projects on APN 5118-015-900 and at 9700 San Fernando Road, which allow for the lease, construction, and use of these properties as temporary shelters for those experiencing homelessness, are statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the projects use "Homeless Housing, Assistance and Prevention Program funds," they are exempt under Governor's Order No. N-32-20. Please refer to the attached NOEs.

Honorable Nury Martinez
September 2, 2021
Page 2 of 2

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

Sincerely,



Digitally signed by Jose Fuentes
DN: C=US, E=jose.fuentes@lacity.org,
O=Public Works, OU=Engineering,
CN=Jose Fuentes
Date: 2021.09.02 11:02:58-07'00'

for

Gary Lee Moore, PE, ENV SP
City Engineer

Attachments

GLM/JF/mem

Q:\GLM\City Engineer\GLM Signed Documents\2021

Documents\TRANSMITTAL_CF20-0841_TinyHomeVillages_CD9_APN51180-15-
900_and_9700_SF_Rd_09-02-21

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

ATTACHMENTS

1. Notice of Exemption (NOE) CD 9 Tiny Home Village Homeless Shelter - Compton Ave and Nevin Ave
2. Notice of Exemption (NOE) CD 6 Tiny Home Village Homeless Shelter - San Fernando Rd and Branford St

ATTACHMENT 1

Notice of Exemption (NOE)

CD 9 Tiny Home Village Homeless Shelter - Compton Ave and Nevin Ave

**CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION**

(Articles II and III – City CEQA Guidelines)

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

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 9
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PROJECT TITLE: CD 9 Tiny Home Village Homeless Shelter - Compton Ave and Nevin Ave	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: Assessor's Parcel No (APN) 5118015900, between Compton Avenue and Nevin Avenue, south of Adams Boulevard, in the Southeast Los Angeles Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1, Project Location. T.G. 674 F2 to 674 G2

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 9 Tiny Home Village Homeless Shelter - Compton Ave and Nevin Ave project (Project) consists of construction of a new homeless shelter on a Metro-owned parcel, a lease, and operation of the homeless shelter with sleeping cabins for approximately 148 individuals, including four Americans with Disabilities Act (ADA) compliant single beds, for people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2021, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27
<input checked="" type="checkbox"/> Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".			

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guideline, Section 15269(c); Public Resources Code, Section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the project uses Homeless Housing, Assistance and Prevention (HHAP) program funds, it is exempt under the Governor's Executive Order No. N-32-20 (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

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

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EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project will provide tiny homes which are small, detached, pre-fabricated cabins assembled on site, 72 with double beds (144 occupants) and four with ADA compliant single beds (four occupants), for approximately 148 individuals; six hygiene pallet units with restrooms, showers, and lavatories; an administration/laundry structure with a service sink, two administrative units, a pedestrian entry and guard station, a storage unit, 148 storage bins, mobile seating areas with umbrellas, a pet relief area, staff parking, eight-foot high perimeter fencing with privacy slats, a 20-foot through fire access lane with an entrance gate at Nevin Avenue and an exit gate at Compton Avenue, a fire hydrant, solid waste receptacles; and utility connections, including potable water, sanitary sewer, and electric service.

The Project operation will include approximately twenty employees working three shifts throughout the day with site security provided on a 24/7 basis or per a security plan consistent with the Los Angeles Homeless Services Authority's (LAHSA) standards. By creating a stable environment and providing access to basic needs, clients will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project site is located on a Metro-owned, approximately 48,601.7 square-foot irregularly shaped parcel, Assessor's Parcel No. (APN) 5118015900, between Compton Avenue and Nevin Avenue, south of Adams Boulevard. The Project site is a non-residential area, an industrial land use area that, under certain circumstances, allows for multifamily uses. The Project site is zoned M1-1 with Limited Industrial land use designation and is surrounded by parcels zoned M1-1 with Limited Industrial land uses (City of Los Angeles Department of City Planning, 2016 and 2021).

II. PROJECT HISTORY

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

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

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic

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

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

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

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

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

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of

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

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

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

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

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

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident

rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Baggett, Travis P et al., 2015).

B. Unexpected and Unabated Dramatic Surge in Homelessness

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering

individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools (Mayor Eric Garcetti, 2020).

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

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

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

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

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

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

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

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

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

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

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

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

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

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

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

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

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, which adopted Section 21080.27 of the California Public Resources Code (PRC) and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles. The intent of AB 1197 is to help the City of Los Angeles address its homeless crisis and is an urgency statute that is deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity

to address the shelter and homeless crisis. AB 1197 took immediate effect on September 26, 2019 in order to address the unique circumstances faced by the City of Los Angeles and to expedite the development of emergency homeless shelters. As noted in the following sections, this shelter project complies with the requirements in AB 1197, and thus the Project is exempt from CEQA pursuant to AB 1197 (PRC § 21080.27).

1. City of Los Angeles Declaration of a Shelter Crisis

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

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

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

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

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

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

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

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

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

Housing First. The Project is a "Housing First" shelter pursuant to Government Code Section 65660. Also, in being such a Housing First shelter, the project complies with

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

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

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

The City's shelters are intended to be a Housing First program focused on quickly moving individuals experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that individuals are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City's emergency shelter will, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help individuals who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this Project, are primarily focused on connecting, transitioning, and referring homeless

individuals into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this Project, are never mandatory and cannot be a condition of obtaining the housing intervention. This Project will provide temporary housing, case managers and Housing Navigators staffed at the facility or offsite who provide connections to homeless services for the occupants. Based on the above-noted information, the project's emergency shelter meets the Housing First requirements relative to AB 1197.

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

The Project provides approximately 148 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

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

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

3. The Project Complies with Government Code Section 65662

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

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

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

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

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

- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

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

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

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

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

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

but would also provide the Los Angeles Continuum with a means to measure the effectiveness of programs serving homeless families. Presently, the Los Angeles Continuum of Care (LACoC) is part of a collaborative called the Los Angeles HMIS Collaborative. The LA HMIS Collaborative consists of three Continuums of Care (CoC): Los Angeles, Glendale, and Pasadena.

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

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

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

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

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

The site located on APN 5118015900, between Compton Avenue and Nevin Avenue, south of Adams Boulevard meets this requirement because it is developed a non-residential use that under certain circumstances allows multi-family uses. At least 75% of the perimeter of the site is surrounded by qualified urban uses. The Project site is zoned M1-1 with Light Industrial land use designation and is owned by Metro. Industrial land uses surround the Project site (Los Angeles Department of City Planning, 2016 and 2021).

The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses, industrial uses. Further, the site itself is considered a qualified urban use because it allows for multifamily uses.

The Project site is located within an urban area on a parcel that is currently developed with an industrial/institutional use (Metro right of way) and is surrounded by qualified urban uses. Therefore, the site meets the definition of infill site. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

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

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

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

7. AB 1197 Conclusion

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

IV. REFERENCES

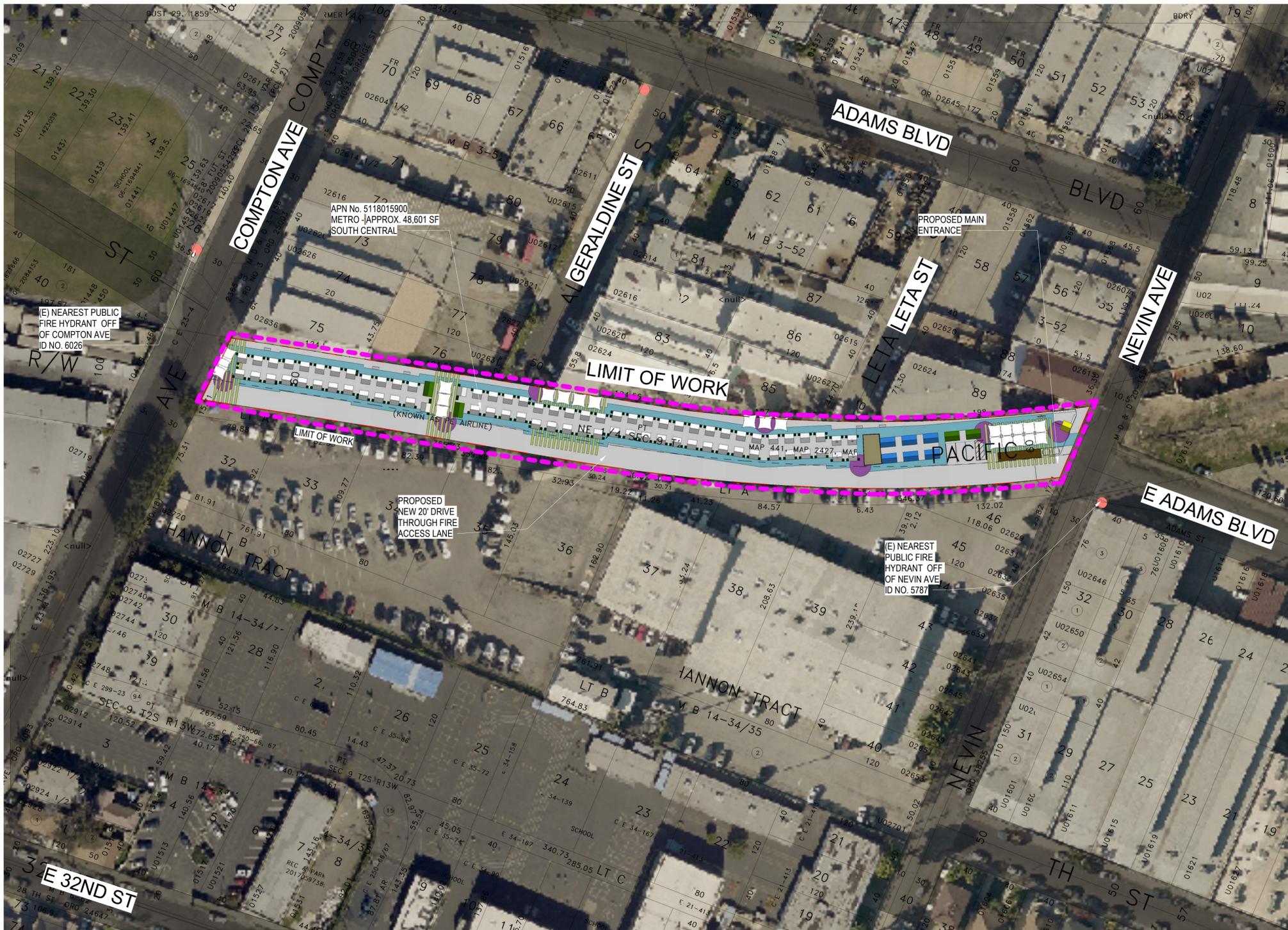
- Hibbs, Jonathan R., MD, et. al. (1994). Mortality in a Cohort of Homeless Adults in Philadelphia. *New England Journal of Medicine*.
- Baggett, Travis P et al. (2015, July 3). *Disparities in Cancer Incidence, Stage, and Mortality at Boston Health Care for the Homeless Program*. Retrieved from PubMed Central (PMC) U.S. National Institutes of Health's National Library of Medicine: <https://www.ncbi.nlm.nih.gov/pubmed/26143955>

- Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, . (2010). The Unmet Health Care Needs of Homeless Adults: A National Study. *American Journal of Public Health*, Vol 100, No. 7.
- Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD. (1999). Mortality Among Homeless Shelter Residents in New York City. *American Journal of Public Health*, Vol. 89, No. 5.
- California Dept. of Public Health. (2020, March 16). *COVID-19 Public Health Guidance, Self Isolation for Older Adults and Those Who Have Elevated Risk*. Retrieved from California Dept. of Public Health: https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/Self_Isolation_Guidance_03.16.20.pdf
- Choi, C. D. (2019, March 23). Declaration of Los Angeles Police Department Commander Dominic H. Choi, P. 6. Los Angeles, CA, USA: Los Angeles Police Department.
- City of Los Angeles Department of City Planning. (2021, August 31). ZIMAS. Parcel profiles for project site. Retrieved from ZIMAS: <http://zimas.ci.la.ca.us/>
- City of Los Angeles Department of Public Works Engineering. (2021, August 31). *NavigateLA*.
- Commander Dominic H. Choi. (2019, March 23). Declaration of Los Angeles Police Department. *Declaration of Los Angeles Police Department, P. 6*. Los Angeles, CA, USA: City of Los Angeles.
- Corey Egel. (2020, March 11). *State Health & Emergency Officials Release Guidance to Prepare and Protect Homeless Californians and Service Providers from COVID-19 No. NR20-018*. Retrieved from California Dept. of Public Health: <https://www.cdph.ca.gov/Programs/OPA/Pages/NR20-018.aspx>
- County of Los Angeles Public Health Department. (2020, April 10). *Order for Control of COVID-19*. Retrieved from County of Los Angeles Public Health Department: http://publichealth.lacounty.gov/media/Coronavirus/docs/HOO/HOO_Safer_at_Home_Order_for_Control_of_COVID_04102020.pdf.
- Department of Public Health. (2019, October). *Recent Trends in Mortality Rates and Causes of Death Among People Experiencing Homelessness in Los Angeles County*. Retrieved from County of Los Angeles, Department of Public Health, Center of Health Impact Evaluation: http://publichealth.lacounty.gov/chie/reports/HomelessMortality_CHIEBrief_Final.pdf
- Governor Gavin Newsom. (2020, March 4). *California Executive Department, Governor's Proclamation of a State of Emergency*. Retrieved from Office of the Governor. State of California: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.4.20-Coronavirus-SOE-Proclamation.pdf>
- Governor Gavin Newsom. (2020, March 12). *Executive Order N-25-20*. Retrieved from California Office of the Governor: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.12.20-EO-N-25-20-COVID-19.pdf>
- Governor Gavin Newsom. (2020, March 18). *Executive Order N-32-20*. Retrieved from California Office of the Governor: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.19.20-attested-EO-N-33-20-COVID-19-HEALTH-ORDER.pdf>

- Governor Gavin Newsom. (2020, March 19). *Executive Order N-33-20*. Retrieved from California Office of the Governor: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.19.20-attested-EO-N-33-20-COVID-19-HEALTH-ORDER.pdf>
- Governor Gavin Newsom. (2020, March 18). *Governor Newsom Takes Emergency Actions & Authorizes \$150 Million in Funding to Protect Homeless Californians from COVID-19*. Retrieved from California Office of the Governor, Press Release <https://www.gov.ca.gov/2020/03/18/governor-newsom-takes-emergency-actions-authorizes-150-million-in-funding-to-protect-homeless-californians-from-covid-19/>
- Governor's Office of Planning and Research. (2018, December 28). *California Environmental Quality Act Guidelines*. Retrieved from Governor's Office of Planning and Research: <https://www.opr.ca.gov/ceqa/updates/guidelines/>
- Hunter, S. B. (2017). *Evaluation of Housing for Health Permanent Supportive Housing Program, p. 2; Hwang SW*, Retrieved from RAND Corporation: https://www.rand.org/pubs/research_reports/RR1694.html
- Hunter, Sarah B., Melody Harvey, Brian Briscoombe, and Matthew Cefalu. (2017). *Evaluation of Housing for Health Permanent Supportive Housing Program*. Retrieved from RAND Corporation: https://www.rand.org/pubs/research_reports/RR1694.html
- Hwang SW, C. C. (2013). A Comprehensive Assessment of Health Care Utilization Among Homeless Adults Under a System of Universal Health Insurance. *American Journal of Public Health*, 103.
- LAFD Battalion Chief and Paramedic Douglas Zabilski. (2019, March 26). *Declaration of Los Angeles Fire Department, paragraph 8*. Los Angeles: City of Los Angeles.
- LAHSA. (2019). *Greater Los Angeles Homeless Count – Data Summary*. Los Angeles: Los Angeles Homeless Services Authority.
- LAHSA. (2019-2020). *LAHSA, Program Standards*. Los Angeles: LAHSA. Retrieved from <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- LAHSA. (2020-2021). *Crisis Housing Program for All Populations Scope of Required Services*. Los Angeles: LAHSA. Retrieved from <https://www.lahsa.org/documents?id=2623-scope-of-required-services-srs-crisis-housing.pdf>
- LAHSA. (2020-2021). *Bridge Housing Program Scope of Required Services*. Los Angeles: LAHSA. Retrieved from <https://www.lahsa.org/documents?id=2624-scope-of-required-services-srs-bridge-housing.pdf>
- LAHSA. (2020, June). *Greater Los Angeles Homeless Count – Data Summary 2020*. Los Angeles: Los Angeles Homeless Services Authority.
- LAHSA. (2020). *Greater Los Angeles Homeless Count – Revised Data Summary 2019*. Los Angeles: Los Angeles Homeless Services Authority.
- LAHSA. (2020). *Revised 2019 Greater Los Angeles Homeless Count – Data Summary*. Los Angeles: Los Angeles Homeless Services Authority.
- Los Angeles Homeless Services Authority. (2018, July 23). *Greater Los Angeles Homeless Count – Data Summary*. *Greater Los Angeles Homeless Count – Data Summary*. Los Angeles, CA, USA.

- Mayor Eric Garcetti. (2020, March 4). *Mayor's Declaration of Local Emergency*. Retrieved from City of Los Angeles: http://clkrep.lacity.org/onlinedocs/2020/20-0291_reso_03-04-2020.pdf
- Mayor Eric Garcetti. (2020, April 10). *Mayor's Safer at Home Order*. Retrieved from City of Los Angeles: <https://www.lamayor.org/sites/g/files/wph446/f/page/file/SaferAtHomeAPR10.pdf>
- Morrison, D. S. (2009). Homelessness as an Independent Risk Factor for Mortality: Results from a Retrospective Cohort Study. *International Journal of Epidemiology*.
- Salit, S. A. (1988). Hospitalization Costs Associated with Homelessness in New York City. *New England Journal of Medicine*.
- Salit, S. A. (1998). Hospitalization Costs Associated with Homelessness in New York City. *New England Journal of Medicine*.
- Santiago. (2019, September 26). AB1197. *California Environmental Quality Act: exemption: City of Los Angeles: supportive housing and emergency shelters*. Sacramento, CA, USA: California State Assembly.
- Schwarcz, Sandra K, Ling C Hsu,, Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz. (2009, July 7). *Impact of Housing on the Survival of Persons with AIDS*. Retrieved from Bio Medical Central Public Health: <http://www.biomedcentral.com/1471-2458/9/220>
- State of California. (2012). Public Resources Code Section 21080.27(a)(2).
- Supervisor Ridley-Thomas, Supervisor Solis. (2019, October 29). *Assessing the Health Care Needs of People Experiencing Homelessness to Address Rising Mortality Rates*,. Retrieved from County of Los Angeles, Board of Supervisors: <http://file.lacounty.gov/SDSInter/bos/supdocs/141362.pdf>
- The Honorable M. Bonin & M. O'Farrell . (2019, 1 21). The City Safe Parking Program. *Council File No. 15-1138-S33*. Los Angeles, CA, USA: City of Los Angeles City Council.
- The Honorable Judge David O. Carter. (2020, May 22). Preliminary Injunction Order issued in LA Alliance for Human Rights v. City of Los Angeles, Case No. LA CV 20-02291-DOC-KES. UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA. Retrieved from Preliminary Injunction Order issued in LA Alliance for Human Rights v. City of Los Angeles, Case No. LA CV 20-02291-DOC-KES (C.D. Cal May 22, 2020).
- The Honorable M. Bonin & M. Harris-Dawson. (2019, 10 21). Declaration of Shelter Crisis. *Council File No. 15-1138-S40*. Los Angeles, CA, USA: City of Los Angeles City Council.
- Wu, F. a. (2016). *The Services Homeless Single Adults Use and Their Associated Costs: An Examination of Utilization Patterns and Expenditures in Los Angeles County over One Fiscal Year*. City of Los Angeles: County of Los Angeles.

Attachment
Project Site Plan



**CD9 - COMPTON AND NEVIN AVE
TINY HOME VILLAGE PROJECT**

SITE DATA INFORMATION :

ADDRESS/LEGAL INFORMATION

SITE ADDRESS NONE
 ZIP CODE NONE
 PIN NUMBER 117A213 295
 LOT/PARCEL AREA (CALCULATED) 48,601.7 (SQ FT)
 THOMAS BROTHERS GRID PAGE 674 - GRID F2
 THOMAS BROTHERS GRID PAGE 674 - GRID G2
 ASSESSOR PARCEL NO. (APN) 5118015900
 TRACT NONE
 MAP REFERENCE NE 1/4 SEC 9 T2S R13W
 BLOCK NONE
 LOT PT NE 1/4 SEC 9 T2S R13W
 ARB (LOT CUT REFERENCE) 13
 MAP SHEET 117A211
 MAP SHEET 117A213

JURISDICTIONAL INFORMATION

COMMUNITY PLAN AREA SOUTHEAST LOS ANGELES
 AREA PLANNING COMMISSION SOUTH LOS ANGELES
 NEIGHBORHOOD COUNCIL SOUTH CENTRAL
 COUNCIL DISTRICT CD 9 - CURREN D. PRICE, JR.
 CENSUS TRACT # 2281.00
 LADBS DISTRICT OFFICE LOS ANGELES METRO
 BUILDING PERMIT INFO VIEW

PLANNING AND ZONING INFORMATION

SPECIAL NOTES NONE
 ZONING M1-1
 ZONING INFORMATION (ZI) ZI-2374 STATE ENTERPRISE ZONE: LOS ANGELES
 ZONING INFORMATION (ZI) ZI-1117 MTA RIGHT-OF-WAY (ROW) PROJECT AREA
 ZONING INFORMATION (ZI) ZI-2452 TRANSIT PRIORITY AREA IN THE CITY OF LOS ANGELES
 ZONING INFORMATION (ZI) ZI-2488 REDEVELOPMENT PROJECT AREA: COUNCIL DISTRICT 9
 ZONING INFORMATION (ZI) ZI-1231 SPECIFIC PLAN: SOUTH LOS ANGELES ALCOHOL SALES
 GENERAL PLAN LAND USE LIMITED INDUSTRIAL
 GENERAL PLAN NOTE(S) YES
 HILLSIDE AREA (ZONING CODE) NO
 SPECIFIC PLAN AREA SOUTH LOS ANGELES ALCOHOL SALES
 SUBAREA NONE
 SPECIAL LAND USE / ZONING NONE
 HISTORIC PRESERVATION REVIEW NO
 HISTORIC PLACES LA VIEW
 CDO: COMMUNITY DESIGN OVERLAY NONE
 CPIO: COMMUNITY PLAN IMP. OVERLAY NONE
 SUBAREA NONE
 CUGU: CLEAN UP-GREEN UP NONE
 HCR: HILLSIDE CONSTRUCTION REGULATION NO
 NSO: NEIGHBORHOOD STABILIZATION OVERLAY NO
 POD: PEDESTRIAN ORIENTED DISTRICTS NONE
 RFA: RESIDENTIAL FLOOR AREA DISTRICT NONE
 RIO: RIVER IMPLEMENTATION OVERLAY NO
 SN: SIGN DISTRICT NO
 SB 35 ELIGIBILITY VIEW
 STREETScape NO
 ADAPTIVE REUSE INCENTIVE AREA NONE
 AFFORDABLE HOUSING LINKAGE FEE
 RESIDENTIAL MARKET AREA LOW
 NON-RESIDENTIAL MARKET AREA EXEMPT (PRIOR TO 2/17/21)
 TRANSIT ORIENTED COMMUNITIES (TOC) TIER 3
 RPA: REDEVELOPMENT PROJECT AREA COUNCIL DISTRICT 9
 CENTRAL CITY PARKING YES
 DOWNTOWN PARKING NO
 BUILDING LINE NONE
 500 FT SCHOOL ZONE ACTIVE: SYNERGY KINETIC ACADEMY
 500 FT SCHOOL ZONE ACTIVE: ANIMO RALPH BUNCHE CHARTER HIGH SCHOOL
 500 FT SCHOOL ZONE ACTIVE: DR. JULIAN NAVA LEARNING ACADEMIES (SCHOOL OF BUSINESS & TECHNOLOGY)
 500 FT SCHOOL ZONE ACTIVE: DR. JULIAN NAVA LEARNING ACADEMY (SCHOOL OF ARTS & CULTURE)
 500 FT SCHOOL ZONE ACTIVE: NEVIN AVENUE ELEMENTARY SCHOOL
 500 FT PARK ZONE NO

ADDITIONAL

AIRPORT HAZARD NONE
 COASTAL ZONE NONE
 FARMLAND AREA NOT MAPPED
 URBAN AGRICULTURE INCENTIVE ZONE YES
 VERY HIGH FIRE HAZARD SEVERITY ZONE NO
 FIRE DISTRICT NO. 1 NO
 FLOOD ZONE OUTSIDE FLOOD ZONE
 WATERCOURSE NO
 HAZARDOUS WASTE / BORDER ZONE PROPERTIES NO
 METHANE HAZARD SITE NONE
 HIGH WIND VELOCITY AREAS NO
 SPECIAL GRADING AREA (BOE BASIC GRID MAP A-13372) NO
 WELLS NONE

SEISMIC INFORMATION

ALQUIST-PRIOLO FAULT ZONE NO
 LANDSLIDE NO
 LIQUEFACTION NO
 PRELIMINARY FAULT RUPTURE STUDY AREA NO
 TSUNAMI INUNDATION ZONE NO

FIRE DEPARTMENT REQUIREMENTS - LAFD NOTES

- SITE WILL REQUIRE A NEW FIRE HYDRANT(S) - VERIFY WITH LAFD.
- NEW 20' LAFD FIRE ACCESS LANE DRIVETHROUGH - ENTRANCE AT NEVIN; EXIT AT COMPTON.
- PROVIDE ONE SMOKE ALARM IN EACH SLEEPING UNIT.
- PROVIDE A FIRE EXTINGUISHER IN EACH UNIT.
- PROVIDE ADDITIONAL FIRE EXTINGUISHERS AT THE EXTERIOR OF THE UNITS AND SPACED NOT MORE THAN 50 FEET APART WITH COVER.
- PROVIDE A KNOX BOX, AT ENTRANCE GATE (S), LOCATE PER FIRE MARSHALL.
- PROVIDE ALL SIGNAGE AS REQUIRED PER LAFD - CONTRACTOR SHALL FURNISH AND INSTALL ACCESSIBILITY SIGNS FOR THE ADA SHELTER UNITS, PALLET SHELTER NUMBERS WITH BRAILLE, RESTROOM SIGNS (ONE FOR EACH), PET AREA SIGN, PARKING SIGNS, AND OTHER MISCELLANEOUS SIGNAGE AS REQUIRED BY LAFD.

**CD9 - COMPTON AND NEVIN AVE
TINY HOME VILLAGE PROJECT**

PROJECT SCOPE:

NEW SHELTER AND HOMELESS PROJECT TO PROVIDE BEDS WITHIN EMERGENCY SLEEPING CABINS FOR 148 INDIVIDUALS. THE IMPROVED PROJECT AREA IS APPROXIMATELY 48,601 SF WITHIN A METRO OWNED LOT ADJACENT TO MOSTLY MANUFACTURING SURROUNDINGS. THE MAIN DRIVEWAY ENTRANCE WILL BE FROM NEVIN AVE AND WILL PROVIDE A 20' DRIVETHROUGH FIRE ACCESS LANE. SITE AMENITIES INCLUDE HYGIENE PALLET UNIT(S) WITH RESTROOMS, SHOWERS, LAVATORIES; SEATING AREAS WITH MOBILE SHADE UMBRELLAS FOR FOOD DISTRIBUTION SERVICES, LAUNDRY UTILITIES, ADMINISTRATIVE OFFICES, STORAGE, A GUARD BOOTH (S), INDIVIDUAL STORAGE BINS, A PET AREA, STAFF PARKING, AND SITE PERIMETER FENCING WITH PRIVACY SLATS.

PROGRAM

PROPOSED EMERGENCY SLEEPING CABIN COUNT (PALLET 64): 76
 • 72 STANDARD - DOUBLE BEDS (144 OCCUPANTS)
 • 04 ADA - SINGLE BEDS (04 OCCUPANTS)
TOTAL BEDS: 148

PALLET RESTROOMS (TOILETS AND SHOWERS): 06 REQUIRED

8x40 ADMIN/LAUNDRY STRUCTURE, W/ SERVICE SINK: 01

STORAGE PALLET(S) - 100'S: 02; FOR ADMINISTRATION OFFICES: 02

GUARD BOOTH - 64 PALLET: 01

**SEATING TABLES AND UMBRELLAS : 24 SETS SHOWN, MINIMUM
SITE BENCHES: 6 SHOWN, MINIMUM**

TOTAL LOT PARCEL(S) AREA - (METRO LOT): APPROXIMATELY 48,601 SF

(E) ASPHALT TO LEVEL: 48,601 SF

SOLAR REFLECTIVE ASPHALT PAINT: 14,000 SF

VICINITY PLAN

1" = 50'-0"



BUREAU OF ENGINEERING

DEPARTMENT OF PUBLIC WORKS

CITY ENGINEER

GARY LEE MOORE, PE, ENV SP

VICINITY AND SITE DATA

COUNCIL DISTRICT: 9

DATE: 08/27/21

DRAWN BY: WD

CHECKED BY: MQ

Scale: 1" = 50'-0"

A001

TINY HOME VILLAGE:
CD9 SOUTH CENTRAL
COMPTON & NEVIN AVE, LOS ANGELES, CA 90011



FIRE ACCESS EXIT WITH GATE AT COMPTON

PEDESTRIAN EXIT

COMPTON AVE

148 STORAGE BINS

02 ADMIN - PALLET 100'S

COMMUNAL AREA

COMMUNAL AREA

PET AREA

PROPOSED NEW, DRIVE THROUGH, 20' FIRE ACCESS LANE

EMERGENCY SLEEPING CABINS, 76 COUNT, 148 BEDS

PROPOSED NEW, PRIVATE FIRE HYDRANT LOCATION - TO BE VERIFIED

NEW PERIMETER 8' HIGH FENCING, WITH PRIVACY SLATS

GERALDINE ST

ADAMS BLVD

(6) HYGIENE PALLET UNITS

02 ADMIN - PALLET 100'S

MAIN EASTING/SEATING SHADED AREAS

LETA ST

GUARD BOOTH AT PEDESTRIAN ENTRANCE

STAFF PARKING (ADA)

(1) 8X40 ADMIN /LAUNDRY CONTAINER/ SINK

MAIN DRIVEWAY ENTRANCE

DUMPSTER (S)

NEVIN AVE

EXISTING FIRE HYDRANT ID NO: 5787, SIZE 2 1/2 X 4D, TYPE VAN DE VENTER, MAIN SIZE: 8

ATTACHMENT 2

Notice of Exemption (NOE)

CD 6 Tiny Home Village Homeless Shelter - San Fernando Rd and Branford St

**CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION**

(Articles II and III – City CEQA Guidelines)

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

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 6
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PROJECT TITLE: CD 6 Tiny Home Village Homeless Shelter - San Fernando Rd and Branford St	LOG REFERENCE C.F. 20-0841
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PROJECT LOCATION: 9700 San Fernando Road public right-of-way, southeast of the San Fernando Road and Branford Street intersection, in the Sun Valley - La Tuna Canyon Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1, Project Location. T.G. 502 F5

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The CD 6 Tiny Home Village Homeless Shelter - San Fernando Rd and Branford St project (Project) consists of construction of a new homeless shelter on public right-of-way, a lease, and operation of the homeless shelter with emergency sleeping cabins for approximately 161 individuals, including five Americans with Disabilities Act (ADA) compliant single beds, for people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On _____, 2021, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (Maria.Martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS:	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27
<input checked="" type="checkbox"/> Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".			

JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in CEQA Guideline, Section 15269(c); Public Resources Code, Section 21080.27 (AB 1197) applicable to City of Los Angeles emergency homeless shelters; and, because the project uses Homeless Housing, Assistance and Prevention (HHAP) program funds, it is exempt under the Governor's Executive Order No. N-32-20 (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

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

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Figure 1: Project Location (Approximate Boundary.)



EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The Project will provide tiny homes which are small, detached, pre-fabricated emergency sleeping cabins assembled on site, 83 with double beds (156 occupants) and five with ADA compliant single beds (five occupants), for approximately 161 individuals; personal storage bins at each cabin, a guard station and storage lockers, four administration units and an administrative storage unit; seven hygiene pallet units with restrooms, showers, and lavatories; a laundry structure with an exterior service sink, mobile seating areas with umbrellas, a pet relief area, staff parking, eight-foot high perimeter fencing with privacy slats, asphalt paving painted with solar reflective coating, a 20-foot double entrance gate and a secondary emergency access gate, as new fire hydrant adjacent to a 20-foot minimum width fire access lane, a fire lane turnaround area, solid waste receptacles; and utility connections, including potable water, sanitary sewer, and electric service.

The Project operation will include approximately twenty employees working three shifts throughout the day with site security provided on a 24/7 basis or per a security plan consistent with the Los Angeles Homeless Services Authority's (LAHSA) standards. By creating a stable environment and providing access to basic needs, clients will be able to maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

The Project site is located on approximately 49,200 square-foot rectangular area of undeveloped right-of-way of the northeast roadway of the San Fernando Road, southeast of the San Fernando Road and Branford Street intersection. The Project site is a non-residential site, public right of way, that allows for multifamily uses. The Project site is public-right-of way with Open Space land use designation and is surrounded by parcels zoned for various uses, M2-1-CUGU (industrial uses) and OS-IXL-CUGU (open space uses) to the north, PF-IXL-CUGU (public facilities, Metro right-of-way to the west and south, and OS-IXL-CUGU (open space uses) to the east (City of Los Angeles Department of City Planning, 2016 and 2021).

II. PROJECT HISTORY

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

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

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

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

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

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

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

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

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

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

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

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

(Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

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

B. Unexpected and Unabated Dramatic Surge in Homelessness

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

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

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

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

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

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

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

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

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

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

COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population.

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

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

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

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

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

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

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

of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City's Safer at Home order particularly noted the following:

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

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

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

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

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

III. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

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

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

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

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

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

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

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

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

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

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

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

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

1. City of Los Angeles Declaration of a Shelter Crisis

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Project provides approximately 161 beds which allow for presence of partners. This Project is pet friendly and includes a pet area. Participants are allowed to bring their pets to the shelter. The Project has storage within each sleeping area for personal possessions or storage bins. The Project is designed to provide privacy to participants by providing each family or individual with their own sleeping space. There are separated sleeping spaces with communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

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

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

3. The Project Complies with Government Code Section 65662

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

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

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

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

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

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

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

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

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

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

Homeless Management Information System. Government Code Section 65662(d) requires Low Barrier Navigation Centers to have a system for entering stays, demographics, income, and exit destination through a local Homeless Management

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

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

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

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

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

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

The site located on a 49,200 square-foot rectangular area of undeveloped right-of-way of the northeast roadway of the San Fernando Road, southeast of the San Fernando Road and Branford Street intersection meets this requirement because it is located on a non-residential site that under certain circumstances allows multi-family uses. At least 75% of the perimeter of the site is surrounded by qualified urban uses, industrial and public facilities. The Project site is public-right-of way with Open Space land use designation and is surrounded by parcels zoned for various uses, M2-1-CUGU (industrial uses) and OS-IXL-CUGU (open space uses) to the north, PF-IXL-CUGU (public facilities, Metro right-of-way to the west and south, and OS-IXL-CUGU (open space uses) to the east (City of Los Angeles Department of City Planning, 2016 and 2021).

The parcel is an infill site that is bounded by parcels that are developed with qualified urban uses, industrial and public facilities uses. Further, the site itself is considered a qualified urban use because it allows for multifamily uses.

The Project site is located within an urban area on a parcel that is currently undeveloped and identified in the Community Plan as open space use, public right-of-way and is surrounded by qualified urban uses. Therefore, the site meets the definition of infill site. Therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

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

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

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

7. AB 1197 Conclusion

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

IV. REFERENCES

- Hibbs, Jonathan R., MD, et. al. (1994). Mortality in a Cohort of Homeless Adults in Philadelphia. *New England Journal of Medicine*.
- Baggett, Travis P et al. (2015, July 3). *Disparities in Cancer Incidence, Stage, and Mortality at Boston Health Care for the Homeless Program*. Retrieved from PubMed Central (PMC) U.S. National Institutes of Health's National Library of Medicine: <https://www.ncbi.nlm.nih.gov/pubmed/26143955>
- Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, . (2010). The Unmet Health Care Needs of Homeless Adults: A National Study. *American Journal of Public Health*, Vol 100, No. 7.
- Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD. (1999). Mortality Among Homeless Shelter Residents in New York City. *American Journal of Public Health*, Vol. 89, No. 5.
- California Dept. of Public Health. (2020, March 16). *COVID-19 Public Health Guidance, Self Isolation for Older Adults and Those Who Have Elevated Risk*. Retrieved from California Dept. of Public Health: https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/Self_Isolation_Guidance_03.16.20.pdf
- Choi, C. D. (2019, March 23). Declaration of Los Angeles Police Department Commander Dominic H. Choi, P. 6. Los Angeles, CA, USA: Los Angeles Police Department.
- City of Los Angeles Department of City Planning. (2021, September 1). ZIMAS. Parcel profiles for project site. Retrieved from ZIMAS: <http://zimas.ci.la.ca.us/>
- City of Los Angeles Department of Public Works Engineering. (2021, August 31). *NavigateLA*.
- Commander Dominic H. Choi. (2019, March 23). Declaration of Los Angeles Police Department. *Declaration of Los Angeles Police Department, P. 6*. Los Angeles, CA, USA: City of Los Angeles.
- Corey Egel. (2020, March 11). *State Health & Emergency Officials Release Guidance to Prepare and Protect Homeless Californians and Service Providers from COVID-19 No. NR20-018*. Retrieved from California Dept. of Public Health: <https://www.cdph.ca.gov/Programs/OPA/Pages/NR20-018.aspx>
- County of Los Angeles Public Health Department. (2020, April 10). *Order for Control of COVID-19*. Retrieved from County of Los Angeles Public Health Department: http://publichealth.lacounty.gov/media/Coronavirus/docs/HOO/HOO_Safer_at_Home_Order_for_Control_of_COVID_04102020.pdf.
- Department of Public Health. (2019, October). *Recent Trends in Mortality Rates and Causes of Death Among People Experiencing Homelessness in Los Angeles County*. Retrieved from County of Los Angeles, Department of Public Health, Center of Health Impact Evaluation: http://publichealth.lacounty.gov/chie/reports/HomelessMortality_CHIEBrief_Final.pdf

- Governor Gavin Newsom. (2020, March 4). *California Executive Department, Governor's Proclamation of a State of Emergency*. Retrieved from Office of the Governor. State of California: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.4.20-Coronavirus-SOE-Proclamation.pdf>
- Governor Gavin Newsom. (2020, March 12). *Executive Order N-25-20*. Retrieved from California Office of the Governor: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.12.20-EO-N-25-20-COVID-19.pdf>
- Governor Gavin Newsom. (2020, March 18). *Executive Order N-32-20*. Retrieved from California Office of the Governor: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.19.20-attested-EO-N-33-20-COVID-19-HEALTH-ORDER.pdf>
- Governor Gavin Newsom. (2020, March 19). *Executive Order N-33-20*. Retrieved from California Office of the Governor: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.19.20-attested-EO-N-33-20-COVID-19-HEALTH-ORDER.pdf>
- Governor Gavin Newsom. (2020, March 18). *Governor Newsom Takes Emergency Actions & Authorizes \$150 Million in Funding to Protect Homeless Californians from COVID-19*. Retrieved from California Office of the Governor, Press Release <https://www.gov.ca.gov/2020/03/18/governor-newsom-takes-emergency-actions-authorizes-150-million-in-funding-to-protect-homeless-californians-from-covid-19/>
- Governor's Office of Planning and Research. (2018, December 28). *California Environmental Quality Act Guidelines*. Retrieved from Governor's Office of Planning and Research: <https://www.opr.ca.gov/ceqa/updates/guidelines/>
- Hunter, S. B. (2017). *Evaluation of Housing for Health Permanent Supportive Housing Program, p. 2; Hwang SW*, Retrieved from RAND Corporation: https://www.rand.org/pubs/research_reports/RR1694.html
- Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu. (2017). *Evaluation of Housing for Health Permanent Supportive Housing Program*. Retrieved from RAND Corporation: https://www.rand.org/pubs/research_reports/RR1694.html
- Hwang SW, C. C. (2013). A Comprehensive Assessment of Health Care Utilization Among Homeless Adults Under a System of Universal Health Insurance. *American Journal of Public Health*, 103.
- LAFD Battalion Chief and Paramedic Douglas Zabilski. (2019, March 26). *Declaration of Los Angeles Fire Department, paragraph 8*. Los Angeles: City of Los Angeles.
- LAHSA. (2019). *Greater Los Angeles Homeless Count – Data Summary*. Los Angeles: Los Angeles Homeless Services Authority.
- LAHSA. (2019-2020). *LAHSA, Program Standards*. Los Angeles: LAHSA. Retrieved from <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- LAHSA. (2020-2021). *Crisis Housing Program for All Populations Scope of Required Services*. Los Angeles: LAHSA. Retrieved from <https://www.lahsa.org/documents?id=2623-scope-of-required-services-srs-crisis-housing.pdf>
- LAHSA. (2020-2021). *Bridge Housing Program Scope of Required Services*. Los Angeles: LAHSA. Retrieved from <https://www.lahsa.org/documents?id=2624-scope-of-required-services-srs-bridge-housing.pdf>

- LAHSA. (2020, June). *Greater Los Angeles Homeless Count – Data Summary 2020*. Los Angeles: Los Angeles Homeless Services Authority.
- LAHSA. (2020). *Greater Los Angeles Homeless Count – Revised Data Summary 2019*. Los Angeles: Los Angeles Homeless Services Authority.
- LAHSA. (2020). *Revised 2019 Greater Los Angeles Homeless Count – Data Summary*. Los Angeles: Los Angeles Homeless Services Authority.
- Los Angeles Homeless Services Authority. (2018, July 23). *Greater Los Angeles Homeless Count – Data Summary*. *Greater Los Angeles Homeless Count – Data Summary*. Los Angeles, CA, USA.
- Mayor Eric Garcetti. (2020, March 4). *Mayor’s Declaration of Local Emergency*. Retrieved from City of Los Angeles: http://clkrep.lacity.org/onlinedocs/2020/20-0291_reso_03-04-2020.pdf
- Mayor Eric Garcetti. (2020, April 10). *Mayor’s Safer at Home Order*. Retrieved from City of Los Angeles: <https://www.lamayor.org/sites/g/files/wph446/f/page/file/SaferAtHomeAPR10.pdf>
- Morrison, D. S. (2009). Homelessness as an Independent Risk Factor for Mortality: Results from a Retrospective Cohort Study. *International Journal of Epidemiology*.
- Salit, S. A. (1988). Hospitalization Costs Associated with Homelessness in New York City. *New England Journal of Medicine*.
- Salit, S. A. (1998). Hospitalization Costs Associated with Homelessness in New York City. *New England Journal of Medicine*.
- Santiago. (2019, September 26). AB1197. *California Environmental Quality Act: exemption: City of Los Angeles: supportive housing and emergency shelters*. Sacramento, CA, USA: California State Assembly.
- Schwarcz, Sandra K, Ling C Hsu,, Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz. (2009, July 7). *Impact of Housing on the Survival of Persons with AIDS*. Retrieved from Bio Medical Central Public Health: <http://www.biomedcentral.com/1471-2458/9/220>
- State of California. (2012). Public Resources Code Section 21080.27(a)(2).
- Supervisor Ridley-Thomas, Supervisor Solis. (2019, October 29). *Assessing the Health Care Needs of People Experiencing Homelessness to Address Rising Mortality Rates*,. Retrieved from County of Los Angeles, Board of Supervisors: <http://file.lacounty.gov/SDSInter/bos/supdocs/141362.pdf>
- The Honorable M. Bonin & M. O’Farrell . (2019, 1 21). *The City Safe Parking Program*. *Council File No. 15-1138-S33*. Los Angeles, CA, USA: City of Los Angeles City Council.
- The Honorable Judge David O. Carter. (2020, May 22). Preliminary Injunction Order issued in LA Alliance for Human Rights v. City of Los Angeles, Case No. LA CV 20-02291-DOC-KES. UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA. Retrieved from Preliminary Injunction Order issued in LA Alliance for Human Rights v. City of Los Angeles, Case No. LA CV 20-02291-DOC-KES (C.D. Cal May 22, 2020).
- The Honorable M. Bonin & M. Harris-Dawson. (2019, 10 21). *Declaration of Shelter Crisis*. *Council File No. 15-1138-S40*. Los Angeles, CA, USA: City of Los Angeles City Council.

Wu, F. a. (2016). *The Services Homeless Single Adults Use and Their Associated Costs: An Examination of Utilization Patterns and Expenditures in Los Angeles County over One Fiscal Year*. City of Los Angeles: County of Los Angeles.

Attachment
Project Site Plan



**CD6 SAN FERNANDO + BRANFORD
TINY HOME VILLAGE**

PROJECT SCOPE:
NEW EMERGENCY HOMELESS PALLET SHELTER PROJECT ON AN UNDEVELOPED RIGHT OF WAY, SAN FERNANDO RD NORTHEAST ROADWAY. THE PROJECT WILL PROVIDE SLEEPING CABINS AND BEDS FOR UP TO 161 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 PALLETS FOR ADMINISTRATIVE OFFICES AND COUNSELING. SITE PERIMETER TO BE FENCED WITH PRIVACY SLATS.

SITE COMPONENTS BREAKDOWN:

- EMERGENCY "PALLET 64" SLEEPING CABINS: **83**
78 STANDARD - DOUBLE BEDS
05 ACCESSIBLE - SINGLE BEDS
TOTAL BEDS: 161
- RESTROOM PALLET STRUCTURES: **7 REQUIRED**
05 STANDARD DOUBLE UNITS = 10 WC, 10 SHOWERS
02 ADA STALL + SINGLE WC UNITS = 4 WC, 2 SHOWERS
TOTALS = 14 WC, 12 SHOWERS
- ADMIN "PALLET 100" STRUCTURES: **04**
- GUARD "PALLET 64": **01**
- 8X40 LAUNDRY STATION STRUCTURE W/SINK
- MOBILE TABLES WITH UMBRELLAS: **25** MINIMUM, PROVIDE 2 EXTRA UMBRELLAS.
- SITE BENCHES: **4** MINIMUM, AS SHOWN.

UTILITIES:

ELECTRICAL:
THE SITE WILL REQUIRE A 400A, 480/277V, 3 PHASE, OVERHEAD ELECTRIC SERVICE. THIS IS BASED ON THE FOLLOWING COUNTS:
7 HYGIENE PALLET STRUCTURES
1 LAUNDRY/ADMIN PREFAB STRUCTURE
88 PALLET STRUCTURES

NOTE: THERE IS EXISTING OVERHEAD POWER LINES THAT RUN ALONG THE NORTHEAST FENCE OF OUR PROJECT SITE, ALONG SAN FERNANDO ROAD, WHICH WE NEED TO STAY OUTSIDE OF THE DRIP LINES.

DOMESTIC WATER:

(E) 6" WATER MAIN ON SAN FERNANDO ROAD NORTHEAST ROADWAY. DWP IS REQUIRED TO EXTEND THE MAIN LINE 200 FT TOWARD SOUTH-EAST TO THE PROPOSED JOBSITE. 2" DOMESTIC WATER METER INSTALLED BY LADWP. APPROX. 180FT OF 2" DOMESTIC WATER LINE INSIDE THE PROPERTY LINE TO PALLET RESTROOMS.

SANITARY SEWER:

(E) 8" SANITARY SEWER MAIN (PIPE ID: 3880802738808026A) ON SAN FERNANDO ROAD NORTHEAST ROADWAY. APPROX. 180FT OF 6" SEWER HOUSE CONNECTION TOWARD SOUTH-EAST TO THE PROPOSED JOBSITE. APPROX. 180 FT OF 4" SANITARY SEWER INSIDE THE PROPERTY LINE TO PALLET RESTROOMS.

FIRE DEPARTMENT REQUIREMENTS

- TO PROVIDE ONE NEW FIRE HYDRANT, LOCATED AS PRE-APPROVED BY LAFD. GENERAL CONTRACTOR TO VERIFY FINAL LOCATION WITH LAFD.
- LAFD APPARATUS WIDE ACCESS LANE THROUGH SITE, VIA SAN FERNANDO RD NORTHWEST ROADWAY. MINIMUM WIDTH TO BE 20' CLEAR. LANE TO REMAIN CLEAR AT ALL TIMES.
- 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.
- PROVIDE AN INTERIOR FIRE EXTINGUISHER IN EACH UNIT.
- PROVIDE ADDITIONAL FIRE EXTINGUISHERS THROUGHOUT SITE, SPACED NOT MORE THAN 50 FEET APART. PROVIDE AN EXTERIOR USE CASING FOR EXTINGUISHER. AVOID ATTACHING TO PALLET STRUCTURES, IF POSSIBLE.





CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS