

# APPROVED

June 01 2023

## BOARD OF RECREATION AND PARK COMMISSIONERS

**BOARD REPORT**

**NO.** 23-110

**DATE** June 01, 2023

**C.D.** 4

### BOARD OF RECREATION AND PARK COMMISSIONERS

**SUBJECT:** GRIFFITH PARK – COUNCIL DISTRICT FOUR (4) RIVERSIDE DRIVE BRIDGE HOUSING – EXTENSION OF EMERGENCY USE OF A PORTION OF THE PARK FOR A TEMPORARY HOMELESS SHELTER FACILITY WITH PERSONAL STORAGE FOR THE HOMELESS FOR A PERIOD NOT TO EXCEED ONE (1) YEAR – STATUTORY EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO CALIFORNIA PUBLIC RESOURCES CODE SECTION 21080(b)(4), [SPECIFIC ACTIONS NECESSARY TO PREVENT OR MITIGATE AN EMERGENCY], AS REFLECTED IN ARTICLE 18 OF THE CALIFORNIA CEQA GUIDELINES SECTION 15269(c), AND CALIFORNIA PUBLIC RESOURCES CODE SECTION 21080.27 (AB 1197), APPLICABLE TO CITY OF LOS ANGELES EMERGENCY HOMELESS SHELTERS

B. Aguirre	<u>          </u>	M. Rudnick	<u>          </u>
		<i>for</i> C. Santo Domingo	<u>DF</u>
B. Jackson	<u>          </u>	N. Williams	<u>          </u>

*[Signature]*  
General Manager

Approved X Disapproved            Withdrawn           

If Approved: Board President *[Signature]* Board Secretary *[Signature]*

### RECOMMENDATIONS

1. Find that the continued emergency use for an additional period not to exceed one (1) year of operation for a total term of operation of four (4) years of a portion of the Department of Recreation and Parks' (RAP) Griffith Park located at 3210 and 3248 Riverside Drive, Los Angeles, CA 90027 (Los Angeles County Assessor's Parcel No. 5434-016-900 and 5434-016-901) (Project Site) as a temporary homeless shelter and personal storage site, is consistent with the use of a portion of Griffith Park for park purposes;
2. Approve the Council District (CD) Four (4) Riverside Drive Bridge Home project (Project), as further described in the Summary of this Report and as previously approved in Board Report #19-179, for an additional period not to exceed one (1) year of operation;
3. Authorize RAP's General Manager or designee to issue a license to the Department of General Services and/or any designated City Department for the operation, security and maintenance of the proposed Project for a period not to exceed one (1) year of operation;

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4. Find that the lease and continued use of the temporary homeless shelter is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to California Public Resources Code Section 21080(b)(4) [Specific actions necessary to prevent or mitigate an emergency] as reflected in Article 18 of the California CEQA Guidelines Section 15269(c), and California Public Resources Code Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters;
5. Request the Bureau of Engineering to file a Notice of Exemption (NOE) with the Los Angeles County Clerk's Office within five (5) working days of approval of this Report;
6. Authorize RAP's General Manager, or designee, to make technical corrections as necessary to carry out the intent of this Report.

### SUMMARY

#### Background

During the 2018 State of the City Address, former Mayor Eric Garcetti announced A Bridge Home (ABH) — an initiative to erect 15 new temporary emergency housing projects, one in each Council District that would create 1,500 new shelter/bridge housing beds located near people in heavily concentrated encampments. The program has since evolved to include the rehabilitation of existing buildings, payment of leases to private owners, and funding of service provision where there were identified County gaps. In short, ABH is inclusive of all innovative opportunities to quickly bring bridge housing resources to people living on the streets.

Griffith Park is a 4,282-acre park bounded by the 134 Ventura Freeway to the north, the 5 Golden State Freeway to the east, the 101 Hollywood Freeway to the west, and Los Feliz Boulevard to the south. Its popular features include the Griffith Observatory, Los Angeles Zoo, Greek Theater, Travel Town Transportation Museum, Autry Museum of the American West, Boys and Girls Camp, several golf courses, and Merry-Go-Round. The Project Site is located on a partially improved parcel, made up of two lots (3248 West Riverside Drive and 3210 Riverside Drive), across the street from the Griffith Park Recreation Center and the Friendship Auditorium.

On September 4, 2019, the Board of Recreation and Parks Commissioners (Board) approved the installation and operation of a temporary homeless facility and personal storage site (Shelter) at 3248 West Riverside Drive and 3210 Riverside Drive for a period of three (3) years (Report No. 19-179). The Shelter and its associated amenities include a 10,800 square-foot (sf) membrane structure with approximately 100 beds, a 1,080-sf hygiene trailer, a 1,080-sf administration/intake trailer, bin storage area, approximately 1,000 sf of elevated deck with stairs and ramps, a 680-sf outdoor pet area, and general open space that serve the local homeless community. The Shelter completed construction in July 2020.

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On July 8, 2020, RAP issued a right-of-entry (ROE) permit to the Department of General Services (GSD) for the operation of the Shelter for a period of three (3) years. GSD leased the site to People Assisting the Homeless (PATH) for the operation of the Shelter. The ROE permit between RAP and GSD expires on July 7, 2023.

On December 12, 2022, Mayor Karen Bass declared a state of emergency on homelessness. The Declaration of the State of Emergency is attached as Attachment 2. Since then Mayor Karen Bass has issued Executive Directives to expedite the construction of affordable and temporary housing and maximize the use of City-owned property for temporary and permanent housing. In addition, on May 16, 2023, the City Council extended the declaration of the state of local emergency on homelessness until June 12, 2023. In connection thereto, the Office of the City Administrator has requested that RAP extend the operation of the Shelter (Attachment 3).

The Office of Council District 4 is supportive of the continued operation of the Shelter.

Upon approval of this Report, RAP will authorize the continued operation of the Shelter at the Project Site for an additional one (1) year period and will issue an ROE permit to GSD for a period of one additional (1) year for the continued operation of the Shelter.

### ENVIRONMENTAL IMPACT

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. The dramatic rise in the homeless population is a sudden unexpected occurrence, as is the unexpected and sudden occurrence of losing access to adequate shelter and essential services for each individual newly experiencing homelessness, as is the unexpected rise in mortality rates among the homeless population since 2019. Each is an emergency presenting impending acute harm to the individuals experiencing homelessness that would be prevented and mitigated through providing housing to those individuals, including through the emergency shelter provided by this Project. The Project, therefore, is exempt from California Environmental Quality Act (CEQA) environmental review pursuant to Section 21080(b)(4) of the California Public Resources Code (PRC), since it prevents and mitigates such imminent loss and damage. Article II, Section 2.a.3. of City CEQA Guidelines also clarify that projects necessary to prevent or mitigate emergencies are exempt from the requirements of CEQA.

Assembly Bill 1197 (Santiago, 2019) was signed into law on September 26, 2019, and adopted Section 21080.27 of the PRC, creating 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. As documented in the attached NOE (Attachment 4), the proposed Project meets the requirements in AB 1197, and thus the proposed Project is also exempt from CEQA pursuant to AB 1197.

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As such, RAP staff recommends that the Board determines that the lease and continued use of the temporary homeless shelter is statutorily exempt from CEQA under PRC, Section 21080(b)(4), as specific actions necessary to prevent or mitigate an emergency, and as reflected in Article 18 of the California CEQA Guidelines, Section 15269(c); and PRC Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters. This determination is consistent with the Notice of Exemption (NOE) and supporting documents in Board of Recreation and Park Commission File No. 19-179 and Council File (CF) No. 19-0126; and consistent with, and supported by, the Commission City Council's prior actions approving the development and use of this shelter.

A NOE, which is attached to this Report, will be filed with the Los Angeles County Clerk should the Board grant its approval.

### FISCAL IMPACT

Approval of this Report will have no fiscal impact on RAP's General Fund. RAP is not responsible for the costs related to the operation or maintenance of the Shelter.

This report was prepared by Meghan Luera, Senior Management Analyst I, Planning, Maintenance and Construction Branch.

### LIST OF ATTACHMENTS

- 1) Attachment 1 – Report No. 19-179
- 2) Attachment 2 – Declaration of State of Emergency Dated December 12, 2022
- 3) Attachment 3 – Memo from the Office of the City Administrative Officer dated April 20, 2023
- 4) Attachment 4 – Notice of Exemption

BOARD OF RECREATION  
AND PARK COMMISSIONERS

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NO. 19-179

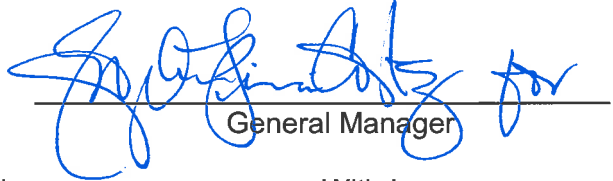
DATE September 4, 2019

C.D. 4

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: GRIFFITH PARK – PROPOSED CD4 RIVERSIDE DRIVE BRIDGE HOUSING PROJECT (W.O. #E1908495) – PROPOSED EMERGENCY USE OF A PORTION OF THE PARK FOR A TEMPORARY HOMELESS SHELTER FACILITY WITH PERSONAL STORAGE FOR THE HOMELESS FOR A PERIOD NOT TO EXCEED THREE (3) YEARS – APPROVAL OF PRELIMINARY PLANS; STATUTORY EXEMPTION FROM THE PROVISIONS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO PUBLIC RESOURCES CODE (PRC) SECTION 21080(b)(4) [SPECIFIC ACTIONS TO MITIGATE EMERGENCIES] REFLECTED IN ARTICLE 18, SECTION 15269(a) OF CALIFORNIA CEQA GUIDELINES AND IN ARTICLE II, SECTION 2.a.3. OF CITY CEQA GUIDELINES.

AP Diaz	_____	S. Piña-Cortez	_____
H. Fujita	_____	C. Santo Domingo	_____
V. Israel	_____	N. Williams	_____

  
 \_\_\_\_\_  
 General Manager

Approved   X   Disapproved \_\_\_\_\_ Withdrawn \_\_\_\_\_

RECOMMENDATIONS

1. Find that the emergency use for a temporary period not to exceed three (3) years of operation, of a portion of the Department of Recreation and Parks' (RAP) Griffith Park (Exhibit A) located at 3210 and 3248 Riverside Drive, Los Angeles, California 90027 (Los Angeles County Assessor's Parcel No. 5434-016-900 and 5434-016-901), as a temporary homeless shelter and personal storage site, is consistent with the use of a portion of Griffith Park (Exhibit B) for park purposes;
2. Approve the proposed CD 4 Riverside Drive Bridge Home (W.O. #E1908495) Project (Project), as further described in the Summary of this Report, for a period not to exceed three (3) years of operation;
3. Approve design plans, in the form as attached to this Report and further described in the Summary of this Report, for the Project to be located in a portion of Griffith Park (Exhibit B);
4. Authorize RAP's General Manager or designee to approve technical revisions to the plans as necessary, to complete the construction of the proposed Project, and authorize RAP's General Manager or designee to approve material changes to the design plans when

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necessary to comply with Los Angeles Department of Building and Safety recommendations related to that department's enforcement of the Aquist-Priolo Earthquake Fault Zone Act;

5. Authorize RAP's General Manager or designee to issue a license (e.g. Temporary Right of Entry Permit), as needed, to the Department of Public Works, Bureau of Engineering (BOE); Department of General Services (GSD); or other City Departments to conduct site preparation, utility installation, and construction and other works related to the installation of the proposed Project at Griffith Park;
6. Authorize RAP's General Manager or designee to issue a license to the Department of General Services and/or any designated City Department for the operation, security and maintenance of the proposed Project for a period not to exceed three (3) years of operation;
7. Find that the proposed Project is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA), pursuant to PRC Section 21080(b)(4), as reflected in Article 18, Section 15269(c) of California CEQA Guidelines and in Article II, Section 2.a.3. of City CEQA Guidelines; and,
8. Request the Bureau of Engineering to file a Notice of Exemption (NOE) within five (5) working days of approval with the City and the Los Angeles County Clerk's Office; and RAP.

### SUMMARY

During the 2018 State of the City Address, Mayor Garcetti announced A Bridge Home (ABH) — an initiative to erect 15 new temporary emergency housing projects, one in each Council District that would create 1,500 new shelter/bridge housing beds located near people in heavily concentrated encampments. The program has since evolved to include the rehabilitation of existing buildings, payment of leases to private owners, and funding of service provision where there were identified County gaps. In short, ABH is inclusive of all innovative opportunities to quickly bring bridge housing resources to people living on the streets.

Griffith Park is a 4,282-acre park bounded by the 134 Ventura Freeway to the north, the 5 Golden State Freeway to the east, the 101 Hollywood Freeway to the west, and Los Feliz Boulevard to the south (Exhibit A). Its popular features include the Griffith Observatory, Los Angeles Zoo, Greek Theater, Travel Town Transportation Museum, Autry Museum of the American West, Boys and Girls Camp, several golf courses, and Merry-Go-Round. The proposed Project site is located on a partially improved parcel, made up of two lots (3248 West Riverside Drive and 3210 Riverside Drive), across the street from the Griffith Park Recreation Center and the Friendship Auditorium.

The proposed Project site is an existing parking lot, measuring approximately 28,500 square-feet with 56 parking spaces. The proposed Project's scope is to construct a temporary homeless shelter (Shelter) to be operated as part of the bridge housing program. The design of the Shelter and its associated amenities include a 10,800 square-foot (sf) membrane structure with

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approximately 100 beds, a 1,080 sf hygiene trailer, a 1,080 sf administration/intake trailer, bin storage area, approximately 1,000 sf of elevated deck with stairs and ramps, a 680 sf outdoor pet area, and general open space that would serve the local homeless community.

The proposed Project is within the Alquist Priolo Fault zone, approximately 300-ft south of the Hollywood Fault zone. The proposed Project will have a 50-foot setback from the southern boundary of the fault zone for the proposed habitable structures at the site.

The shelter will be operated for up to three (3) years and will provide emergency shelter, hygiene, storage, food services and case management to homeless individuals. The purpose of this proposed Project is to provide an emergency shelter for the local homeless community to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing.

Councilmember Ryu and Council District (CD) 4 staff have had numerous discussions with community members and stakeholders. CD4 staff presented the proposed Project to the Los Feliz Neighborhood Council (LFNC) on February 19, 2019, the Los Feliz Improvement Association (LFIA) on January 22, 2019, and have updated the Griffith Park Advisory Board (GPAB) on February 28, 2019, and each month thereafter. On May 2, 2019, Councilmember Ryu visited the Griffith Park Adult Community Club, located on Park property across the street from the proposed Project, and discussed the Project with their membership.

Additionally, CD4 staff has held weekly "small group discussions" with people interested in learning more about this proposed Project. Anyone can sign up for a meeting on Councilmember Ryu's website. Information about these meetings has been disseminated by LFIA, LFNC, CD4 weekly emails, and published in the Los Feliz Ledger. Meetings have been averaging three (3) to ten (10) people in attendance, and have been held on March 5, March 12, March 19, March 26, April 1, April 11, April 26, April 29, May 6, May 15, May 21, June 12 and June 26 of this year (2019).

To date, CD4 has received letters of support from LFIA, LFNC, the Atwater Village Neighborhood Council, and the Friends of Griffith Park. Additionally, the SELAH Homeless Coalition, a group with members from five (5) nearby neighborhood councils, has been very supportive of this proposed Project. Small group discussions and presentations to neighborhood group will continue throughout this process.

RAP staff provided a briefing of the proposed Project to RAP's Facility Repair and Maintenance Commission Task Force (Task Force) on July 17, 2019. The Task Force recommended this proposed Project go forward to the full Board of Recreation and Park Commissioners (Board) for consideration.

The City Engineer's estimate for the project is approximately Four Million, Six Hundred Forty-Seven Thousand Dollars (\$4,647,000). This proposed Project will be fully funded through the A Bridge Home Program.

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It should be noted that on March 20, 2019, the Board approved a similar bridge housing project on a portion of Lafayette Park in Westlake (Report No. 19-062). The area occupied by that particular project measures approximately 30,127 square-feet.

### TREES AND SHADE

As part of this proposed Project, two (2) trees will be removed to place the membrane structure within the asphalt area. The impacted trees are a small Palm and a 12" Eucalyptus.

### ENVIRONMENTAL IMPACT

The proposed Project consists of the new construction of a temporary homeless shelter. This proposed Project is meant 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 (Attachment 2). Public Resources Code (PRC) section 21080(b)(4) provides that the California Environmental Quality Act (CEQA) does not apply to “specific actions necessary to prevent or mitigate an emergency.” PRC 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.” Moreover, Article 18, Section 15269(c) of CEQA Guidelines clarifies that a project to prevent a future emergency – such as this Project, which is designed to mitigate the impacts caused by the spike in homelessness — need not be sudden or unexpected to qualify as statutorily exempt from CEQA compliance. Article II, Section 2.a.3. of City CEQA Guidelines also clarify that that projects necessary to prevent or mitigate emergencies are exempt from the requirements of CEQA. As such, RAP staff recommends that the Board determines that the proposed Project is statutorily exempt from the provisions of CEQA pursuant to PRC Section 21080(b)(4), as reflected in Article 18, Section 15269(c) of California CEQA Guidelines and in Article II, Section 2.a.3. of City CEQA Guidelines. A NOE, which is attached to this Report, will be filed with the Los Angeles County Clerk should the Board grant its approval.

### FISCAL IMPACT

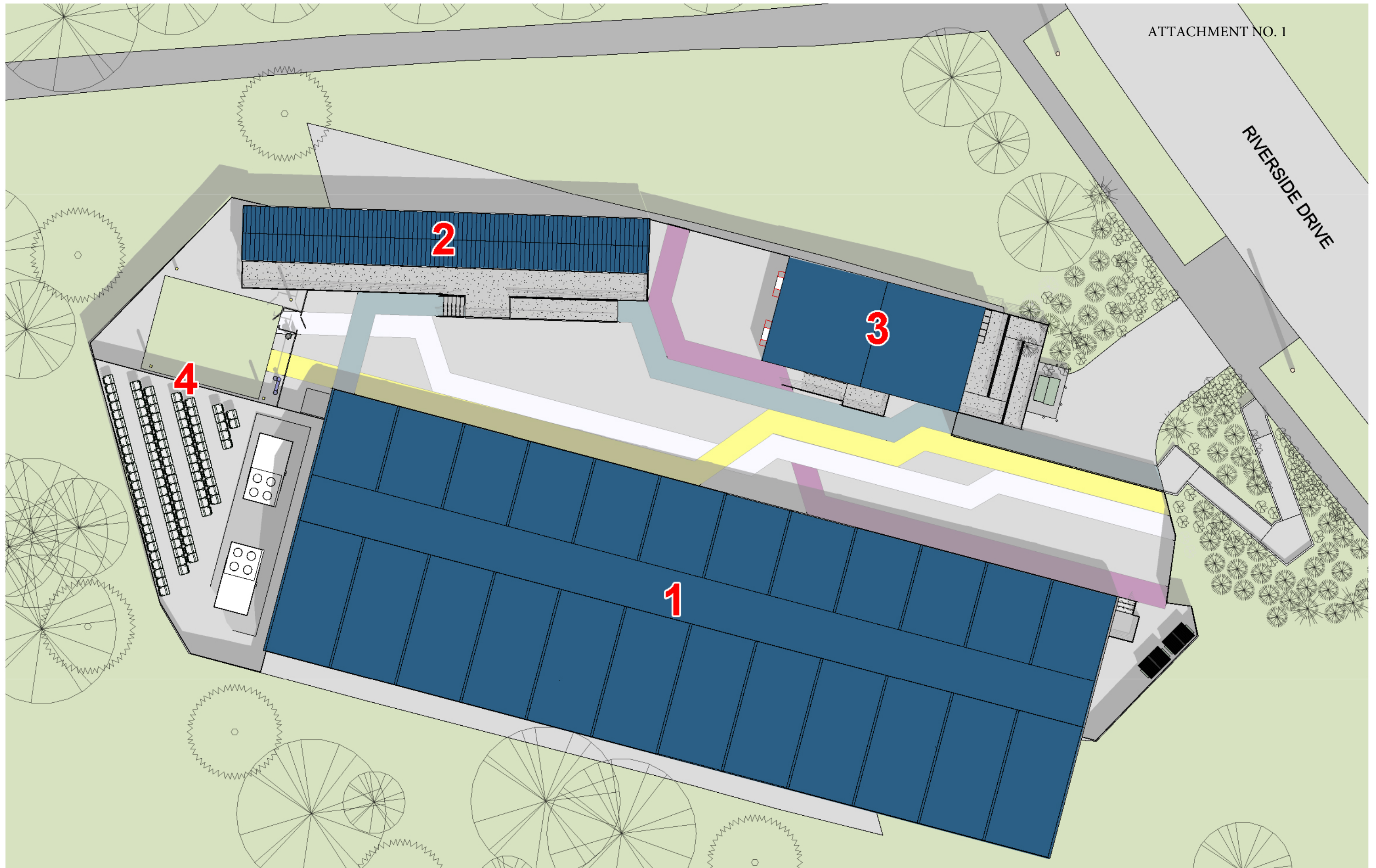
This proposed Project will be fully funded through the A Bridge Home Program and a maintenance fund will be established for the duration of services. There is no fiscal impact to the RAP’s general fund.

This Report was prepared by Marina Quiñonez, Architect, BOE Homeless Facilities Division, reviewed by Deborah Weintraub, BOE, Chief Deputy City Engineer; Darryl Ford, Superintendent, Planning, Construction and Maintenance Branch,

### LIST OF ATTACHMENTS/EXHIBITS

Attachment 1 - Preliminary Plans  
Attachment 2 - Notice of Exemption





<b>1</b>	<b>PROGRAM MATRIX</b>				
	<b>TENT STRUCTURE 60' x 180'</b>	10,800 SF	<b>2</b>	<b>HYGIENE STATION 12' x 90'</b>	1,080 SF
	TOTAL BEDS	100		TOILETS (1:15)	7
	CASE MANAGER (3 @ 80 SF)	240 SF		SHOWERS (1:15)	7
	COMMON AREA:	2,200 SF		LAVATORIES	9
LOUNGE SPACE	700 SF		LAUNDRY FACILITY	YES (4 W/4D)	
TABLE SPACE	1,500 SF				
			<b>3</b>	<b>ADMINISTRATION 24' x 45'</b>	1,080 SF
				SECURE INTAKE OFFICE	168 SF
				CASE MANAGER (5 OFFICES)	408 SF
				STAFF RESTROOMS (2)	104 SF
			<b>4</b>	<b>OUTDOOR AREAS</b>	
				PET RELIEF AREA	680 SF
				STORAGE BIN AREA (100 GALLON BINS)	900 SF



# CD4: RIVERSIDE DRIVE

SITE PLAN: 08-20-19





# CD4: RIVERSIDE DRIVE

SITE PLAN: 08-20-19



Eric  
Garcetti  
Mayor of LA



DAVID RYU  
L.A. CITY COUNCIL MEMBER



COUNTY CLERK'S USE

CITY OF LOS ANGELES  
OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL

CITY CLERK'S USE

LOS ANGELES, CALIFORNIA 90012  
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.

<b>LEAD CITY AGENCY AND ADDRESS:</b> City of Los Angeles c/o Bureau of Engineering, 1149 S. Broadway, MS 939, Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b> 04
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<b>PROJECT TITLE:</b> CD 04 Riverside Dr Bridge Housing Facility	<b>LOG REFERENCE</b> C.F. No. 19-0126
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<b>PROJECT LOCATION:</b> 3210 West Riverside Drive, Los Angeles, CA 90027	T.G. 594 C2
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**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT** The project is the construction of a temporary homeless shelter on a partially improved parcel made up of two lots that will operate for up to 3 years and will provide emergency shelter, hygiene, storage, food services and case management to homeless individuals. The nature of this project is to serve the local homeless community within the vicinity of the project. The purpose of the project is to provide emergency shelter for the homeless to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The proposed project is infill development that will consist of a temporary change in use from a surface parking lot and open space to a temporary Bridge Housing emergency homeless shelter. The City will construct the project and lease the property to the County of Los Angeles for operating the facility for up to 3 years. The site property is located at 3210 and 3248 Riverside Drive, Los Angeles, CA 90027, as shown in *Figure 1 – Project Site Location*. The project location is approximately 3.3 acres and is comprised of two (2) lots with two Assessor Parcel Numbers (APN) including 5434-016-900 and 5434-016-901. The project site is approximately 28,500-square feet (sf) of the total parcel area and is proposed to be generally situated on an existing surface parking lot that currently has 56 parking spaces. The City-owned lot is located in the City of Los Angeles Council District 4 in the Hollywood Community Plan Area. The project site is located within the south east portion of Griffith Park, a City of Los Angeles Historical Cultural Monument within the Loz Feliz community just southeast of the intersection of Riverside Drive and Los Feliz Boulevard; on the west side of Riverside Drive. The project site is 2.2 miles southeast of the Griffith Observatory. The project design includes a total of approximately 28,500-sf; up to a 10,800 square-foot (sf) tent structure with approximately 100 beds, an approximately 1,080-sf hygiene trailer, an approximately 1,080-sf administration/intake trailer, a repose garden, bin storage area, waste and recycling area, an approximately 3,500-sf of elevated deck with stairs and ramps, an approximately 680-sf outdoor pet area and general open space that would serve the local homeless community. New utilities including water, electrical and sewer lines will be added and approximately 700-linear-feet of onsite fencing are also included in the project. Up to five trees will be removed. Standard conditions, including a construction management plan incorporated into the project design, will apply. The proposed project is 300-ft south of the Hollywood Fault Zone. The project will have a 50-ft setback from the southern boundary of the fault zone for the proposed habitable structures at the site. The project will not significantly impact environmental resources. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details)

<b>CONTACT PERSON:</b> Maria Martin	<b>TELEPHONE NUMBER:</b> 213-485-5753
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<b>EXEMPT STATUS: (Check One)</b>	<b>CITY CEQA GUIDELINES</b>	<b>STATE CEQA GUIDELINES</b>	<b>CA PUBLIC RESOURCES CODE</b>
<input type="checkbox"/> MINISTERIAL	Art. II, Sec. 2.b	Sec. 15268	
<input type="checkbox"/> DECLARED EMERGENCY	Art. II, Sec. 2.a(1)	Sec. 15269(a)	
<input type="checkbox"/> EMERGENCY PROJECT	Art. II, Sec. 2.a(3)	Sec. 15269(c)	
<input type="checkbox"/> GENERAL EXEMPTION	Art. II, Sec. 1	Sec. 15061(b)(3)	
<input type="checkbox"/> CATEGORICAL EXEMPTION*	Art. III, Sec	Sec	
<input checked="" type="checkbox"/> STATUTORY			Sec. 21080(b)(4)

\* See Public Resources Code Sec. 21080 and set forth state and city guidelines provisions.

**JUSTIFICATION FOR PROJECT EXEMPTION:** This project is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to mitigate an emergency as also reflected in CEQA Guideline Section 15269(c) and in the City's CEQA Guidelines as provided above, see attached narrative.

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

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

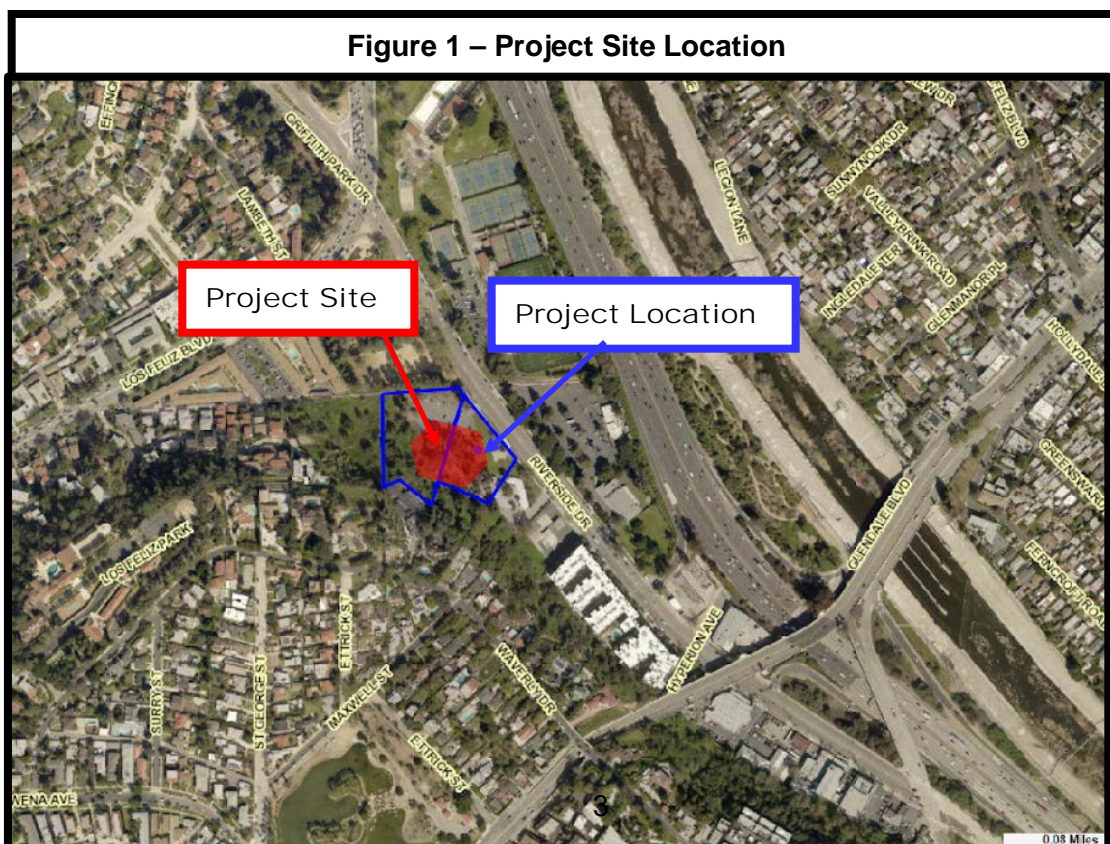
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## EXEMPTION NARRATIVE

### I. PROJECT DESCRIPTION, CONTINUED

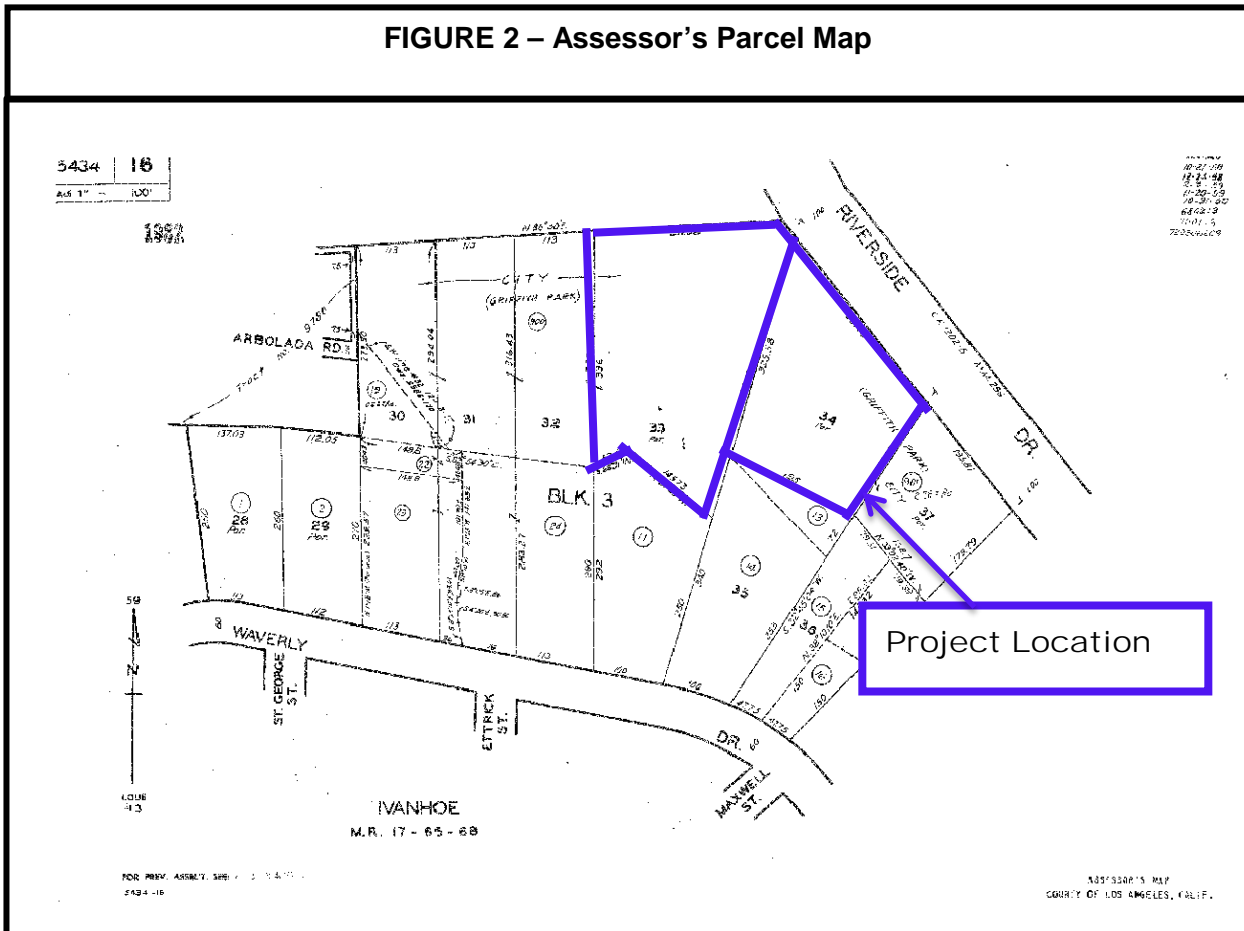
The project is the new construction of a temporary homeless shelter that will operate for up to 3 years and will provide emergency shelter, hygiene, storage, food services and case management to homeless individuals. The nature of this project is to serve the local homeless community within the vicinity of the project. The purpose of the project is to provide emergency shelter for the homeless to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The proposed project is infill development that will consist of a temporary change in use from a surface parking lot and open space parcel to a temporary Bridge Housing emergency homeless shelter. The site property is located at 3210 and 3248 Riverside Drive, Los Angeles, CA 90027, as shown in *Figure 1 – Project Site Location*.

The project location is approximately 3.3 acres and is comprised of two (2) lots with two Assessor Parcel Numbers (APN) including 5434-016-900 and 5434-016-901, as shown in *Figure 2 – Assessor Parcel Map*. The project site is approximately 28,500-square feet (sf) of the total parcel area and is proposed to be generally situated on an existing surface parking lot that currently has 56 parking spaces. The City-owned lot is located in the City of Los Angeles Council District 4 in the Hollywood Community Plan Area. The project site is located within the southeast portion of Griffith Park, a City of Los Angeles Historical Cultural Monument, within the Loz Feliz community just southeast of the intersection of Riverside Drive and Los Feliz Boulevard; on the west side of Riverside Drive. The proposed project is 300-ft south of the Hollywood Fault Zone. The project will have a 50-ft setback from the southern boundary of the fault zone for the proposed habitable structures at the site. The project site is 2.2 miles southeast of the Griffith Observatory and is 400 feet west of the Los Angeles River. The project development footprint is approximately 20% of the total project site.



The project design includes a total of approximately 28,500 square feet; the new construction up to a 10,800 square-foot (sf) tent structure with approximately 100 beds, a 1,080-sf hygiene trailer, a 1,080-sf administration/intake trailer, a repose garden, bin storage area, waste and recycling area, 3,500-sf of elevated deck with stairs and ramps, an 680-sf outdoor pet area and general open space that would serve the local homeless community. New utilities including water, electrical and sewer lines will be added and 700-linear-feet of onsite fencing are also included in the project. Up to five trees will be removed. Standard conditions, including a construction management plan incorporated into the project design, will apply.

**FIGURE 2 – Assessor’s Parcel Map**



The project design shall comply with a construction management plan that includes project design conditions, as necessary, to protect the health, safety, or convenience of affected sensitive receptors, located in the neighborhood that surrounds the project. The construction management plan and appropriate design conditions have been selected from the *City of Los Angeles, Bureau of Engineering, Master Specifications, Division 01, General Requirements, Section 01562, Part 1.1.C*. Selected design conditions are detailed further under applicable resource area analyses (Reference 1). Further, a performance-based approach for developing seismic design features will allow the Department of Building to apply a more direct, non-prescriptive approach to the final design, as necessary. In addition, unless otherwise stated, the proposed project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards including but not limited to:

- Los Angeles Municipal Code
- Bureau of Engineering Standard Plans
- Standard Specifications for Public Works Construction

- Work Area Traffic Control Handbook
- Additions and Amendments to the Standard Specifications for Public Works Construction
- Department of Recreation and Parks Trees Protection Specifications.

## II. PROJECT HISTORY

The presence of the unsheltered homeless population and their homeless encampments has increased over the last year by 16%. Because of this, in some areas of the city, access to public places, access routes, and businesses has been hindered, and although there are a growing number of support services to help the homeless find their way off the streets, more services are needed. The latest homeless count in the project area was completed by the Data and Research Unit of the Los Angeles Homeless Services Authority. See *Table 1- Homeless Population Count* for the homeless population count prepared by this Unit on March 8, 2019 for the census tract associated to the proposed project (Tract Number 1882.01) and for various radii from the site (Reference 2, 3).

### Project Area Homelessness

The recent homeless count in the project area was completed by the Data and Research Unit of the Los Angeles Homeless Services Authority. See *Table 1- Homeless Population Count* for the homeless population count prepared by this Unit on July 18, 2019 for the associated census tract (Tract Number 1882.01) of the project site and for various radii from the site (Reference 2, 3). The project area homelessness data is consistent with the Citywide data, documenting a significant homeless population presenting a danger to health, life, public safety and undue burden on essential public services as detailed further below.

<b>Table 1 Homeless Population Count</b>				
<b>Homeless Population</b>	<b>Within Census Tract (1882.01)</b>	<b>Within .5 miles</b>	<b>Within 1.0 miles</b>	<b>Within 1.5 miles</b>
Unsheltered	14	25	78	176
Sheltered	0	0	0	0
<b>Total</b>	<b>14</b>	<b>25</b>	<b>78</b>	<b>176</b>

### **III. STATUTORY EXEMPTION**

#### **III. A. THE PROJECT IS EXEMPT FROM CEQA BASED ON STATUTORY EMERGENCY EXEMPTION**

##### **III.A.1. Emergency CEQA Statutory Exemption**

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 (the CEQA Guidelines) 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. The project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

##### **III.A.2. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services**

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 .0078 percent of the City’s population (Reference 4).

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 (Reference 5). 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 (Reference 6)



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 (Reference 7). 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 (Reference 8).

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.") (Reference 9) This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, but is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

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

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Reference 10). 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 (Reference 11). 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 (Reference 12). 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 (Reference 13).

*Access to Healthcare.* A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Reference

14). 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 (Reference 15).

*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 (Reference 16).

### III.A.3. Unexpected and Sudden 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 (Reference 17). 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.

Among other responses to homelessness, on April 17, 2018 the Mayor and City Council of the City of Los Angeles declared a Homeless shelter crisis (Reference 18). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a four percent overall decrease in the number of persons experiencing homelessness in LA County (Reference 19).

*Table 2 - 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 at Reference 19.

<b>Table 2 2018 Homeless Count Data Summary</b>		
	<b>Number of Individuals</b>	<b>Change from 2017</b>
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these ongoing efforts and the initial progress shown in 2018, the 2019 Homeless Count, released in June 2019, unexpectedly has documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in Reference 20 *Table 3 - 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 Reference 20:

<b>Table 3 2019 Homeless Count Data Summary</b>		
	<b>Number of Individuals</b>	<b>Change from 2018</b>
Sheltered Homeless	9,079	8% Increase
Unsheltered Homeless	27,221	19% Increase
Total Homeless Persons	36,600	16% Increase

The unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified in 2019, and attendant identified dangers to health, life, property and burden on public resources present an emergency situation as defined by CEQA.

**III.A.4. The Project is Exempt from CEQA Because it is Designed to Mitigate an Emergency**

Homelessness, as documented above, itself presents a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services, meeting the definition of emergency provided by Public Resources Code section 21060.3. Homeless populations themselves suffer from adverse health impacts greater than the non-homeless population, including greater risk of death. Homeless individuals impose outsized impacts upon and use public safety and public health resources compared to the general population. The project is designed to mitigate all of these dangers.

The 2019 increase in homelessness in the City was both sudden and unexpected, further meeting the CEQA definition of an emergency set forth at Section 21060.3. Prior to June 2019, homelessness had been decreasing following County and City efforts, showing that the June 2019 dramatic increase in homeless persons was both unexpected and sudden. Moreover, CEQA Guideline section 15269(c) clarifies that a project to prevent a future emergency – such as the project which is designed to mitigate the impacts caused by the spike in homelessness -- need not be sudden or unexpected to qualify as statutorily exempt from CEQA compliance.

Finally, the fact that Section 21060.3 defines an emergency to include events beyond natural or geologic emergencies such as riots, accidents, or sabotage, shows that the dramatic increase of the already large Los Angeles-area homeless population is the type of emergency exempt from CEQA environmental review. The dramatic increase in homelessness identified in June 2019 and the attendant significant adverse public health, safety, and welfare impacts that are associated with homelessness would also be exacerbated by delaying the project in order to conduct a CEQA environmental review. The City’s approval of the project to mitigate the

unexpected and dramatic surge in homelessness is the type of emergency situation the legislature intended to fall outside the scope of CEQA review when it adopted Section 21080(b)(4). For these reasons, the project is statutorily exempt from compliance with CEQA as a specific action necessary to mitigate an emergency.

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## ATTACHMENT 2

### DECLARATION OF LOCAL EMERGENCY

**WHEREAS**, Section 231(i) of the Los Angeles City Charter and Ch. 3, Section 8.27 of the Los Angeles Administrative Code provide that the Mayor of the City of Los Angeles has the authority to declare the existence of a local emergency as a result of any occurrence which, by reason of its magnitude, is or is likely to become beyond the control of the normal services, personnel, equipment, and facilities of the regularly constituted branches and departments of City government; and

**WHEREAS**, the City of Los Angeles has at any given time approximately 41,980 people experiencing homelessness Citywide; and

**WHEREAS**, the number of unhoused people in the City of Los Angeles has increased dramatically in recent years, nearly doubling in the past decade, with the number of unhoused families increasing by 238 percent since 2007; and

**WHEREAS**, the City of Los Angeles represents 9.6 percent of the State of California's population but 25 percent of the State's unsheltered population, and the City represents only 1.2 percent of the total United States population but 7.2 percent of the United States population of people experiencing homelessness; and

**WHEREAS**, as a percentage of its population, the number of unsheltered people in the City of Los Angeles is approximately 18 times higher than the number in New York City and 14 times higher than the number in Chicago; and

**WHEREAS**, there are more people currently experiencing homelessness in the City of Los Angeles than were displaced by Hurricane Harvey in Houston (30,000) or the 1994 Northridge Earthquake (20,000); and

**WHEREAS**, homelessness has disproportionately impacted Black, Indigenous and Immigrant Angelenos. Black people comprise only 8 percent of the population of the City of Los Angeles but, in the most recent homelessness count, accounted for 33 percent or more of people experiencing homelessness; and

**WHEREAS**, homelessness has increased dramatically and disproportionately among Hispanic and Latino Angelenos during the COVID-19 pandemic. The share of the population of people experiencing homelessness who are Hispanic or Latino increased by 30 percent between 2020 and 2022 and now constitute 42 percent of unhoused individuals. Black and Brown Angelenos comprise 75 percent of people experiencing homelessness; and

**WHEREAS**, the homelessness crisis has had unacceptable consequences for Angelenos, including a significant death toll that has rapidly increased since the start of the COVID-19 pandemic. The Los Angeles County Department of Public Health has reported an average of over 5 deaths per day of unhoused persons as of March 2021, a 200 percent increase in the death rate of persons experiencing homelessness over the past decade and a 56 percent increase over just one year prior; and

**WHEREAS**, women now comprise about a third of people experiencing homelessness and at least 60 percent of those women have experienced violence, and more than a third of LGBTQ+ women experiencing homelessness have experienced sexual assault; and

**WHEREAS**, a disproportionate share of youth experiencing homeless identify as LGBTQ+ and lack adequate access to resources; and

**WHEREAS**, the murder rate for people experiencing homeless is at the highest recorded levels, and increased by 47 percent in 2021 alone; and

**WHEREAS**, severe overcrowding in Los Angeles has also led to increased deaths from COVID-19. In neighborhoods with 40 percent overcrowding as compared to a national average of 3 percent, residents are 11 times more likely to die because of COVID-19; and

**WHEREAS**, shelter and housing is particularly important during these coming winter months when people experiencing homelessness in the City are likely to face heightened exposure and dangers from living outdoors, and heightened dangers from the combination of COVID-19, flu outbreak and respiratory syncytial virus (RSV). It is projected that the City will face an acute shortage of winter homeless shelters through March 2023, with fewer than half the number of shelter sites available as in the winter of 2021-2022 and nearly two-thirds fewer shelter beds; and

**WHEREAS**, the City's eviction moratorium, which has protected many Angelenos from falling into homelessness, ends concurrently with the end of the City's State of Local Emergency regarding the COVID-19 pandemic on February 1, 2023; and

**WHEREAS**, the State of California's COVID-19 State of Emergency, which has provided resources to keep many Angelenos from falling into homelessness, ends in February of 2023, thus requiring immediate action in order to create replacement and additional housing and shelter, and in order to support the necessary infrastructure and laws required to protect and provide that shelter and housing; and

**WHEREAS**, people experiencing homelessness suffer disproportionately from mental and physical health ailments, the treatment of which has strained the City's ability to provide appropriate shelter and housing and which require assistance from the County



Health Department to provide the necessary public services. Specifically, it is estimated that 47 percent of unsheltered people in the City of Los Angeles are affected by a health condition, 46 percent are affected by substance abuse, 34 percent are affected by a serious mental illness, 29 percent are affected by physical disabilities, 17 percent are affected by post-traumatic stress disorder, 7 percent are affected by developmental disabilities, and 6 percent are affected by traumatic brain injuries. Recent studies differ on the exact percentages but dramatic increases over time are prevalent in all of the data. The prevalence of extreme need significantly stress the City's public services; and

**WHEREAS**, notwithstanding that the State of California has enacted a CARE Court to address the crisis of untreated mental illness, the beds and necessary access to acute and subacute care is in development and steps must be taken in the interim to provide increased access to care; and

**WHEREAS**, the homelessness crisis has strained the City's public safety resources. Among other things, occurrences of fires related to homelessness have nearly tripled between 2018 and 2021, averaging 24 fires a day in the first quarter of 2021, and now constitute a majority of all fires to which the Los Angeles Fire Department responds; and

**WHEREAS**, paramedic calls to address the crisis on our streets and in our other public spaces are increasing at alarming rates and unhoused residents are 19 times more likely to require an emergency room transport by paramedics than housed residents; and

**WHEREAS**, the homelessness crisis confronting Los Angeles has grown both incrementally and exponentially, leading to death, illness, and deplorable living conditions even worse than those that created emergencies due to persistent and worsening conditions from prison overcrowding, deterioration in water quality, or fire risk due to climate change; and

**WHEREAS**, the conditions in December 2022 are even more dire than when Mayor Bradley declared a local emergency due to the upcoming winter weather and its effects on the people experiencing homelessness in 1987; and

**WHEREAS**, the displacement of the number of people living on the streets of the City of Los Angeles today is a daily recurring emergency, empowering the Mayor to declare a state of emergency, no less than if the emergency was caused by an earthquake, fire, or flood; and

**WHEREAS**, the City's ability to mobilize local resources, coordinate interagency response, accelerate procurement of housing units, use mutual aid, and seek assistance and potential reimbursement by the State and Federal governments will be critical to successfully responding to this homelessness crisis; and

**WHEREAS**, during the pendency of the existence of a local emergency, the Los Angeles City Council shall retain its full authority to consider a variety of City ordinances to codify the measures necessary to address this homelessness crisis; and

**WHEREAS**, during the COVID-19 pandemic the City Council created the COVID-19 Homelessness Roadmap and committed the funding and resources needed to produce 6700 housing options in 18 months; and

**WHEREAS**, the City currently has 14,475 interim housing beds and the City Council continues to prioritize the building of interim and permanent supporting housing and yet need outpaces demand; and

**WHEREAS**, the City projects it will soon have a total of 12,908 supportive and affordable units, of which 3,861 have been completed already, 5,171 are currently under construction, and 3,876 are in pre-development; and

**WHEREAS**, notwithstanding that Council has been and is acting with urgency, including implementing a roadmap to house thousands of Angelenos and building an unprecedented number of supportive housing units and shelters, an emergency declaration is necessary to mobilize resources, save lives, and provide for the public health, welfare, and safety of all; and

**WHEREAS**, the City of Los Angeles has responded to the rapid increase in its homeless population with unprecedented investments into homelessness solutions, including a nearly \$1.2 billion commitment in the 2022-2023 City budget for the construction of thousands of units of supportive housing, the expansion of bridge housing, and the hiring of professionals to address the homelessness crisis and, notwithstanding these efforts, the number of those experiencing homelessness in the City continues to increase and outstrip the resources and services that the City has provided; and

**WHEREAS**, the magnitude of loss of life, the persistent and disproportionate impact of the COVID-19 pandemic, and the persistent discriminatory impacts of a lack of housing warrant and necessitate that I declare the existence of a local emergency; and

**WHEREAS**, the benefits of this emergency declaration, coupled with past and future actions by the Los Angeles City Council to address the homelessness crisis, will help ensure that this local emergency will be of a temporary nature;

**NOW, THEREFORE**, I hereby declare the existence of a local emergency and direct all Divisions of the Emergency Operations Organization (EOO) and all other City Departments to take necessary steps for the protection of life, health and safety in the City of Los Angeles.

**I REQUEST**, that the City Council adopt resolutions pursuant to the Los Angeles Administrative Code Sections 10.1.1, 10.2.1, 10.5(a)(8), and 10.5.5 to expedite the procurement and contracting process for materials, equipment, and services necessary to respond rapidly to the homelessness crisis.

**I DIRECT** that, as Director of the EOO, I shall coordinate Citywide planning and response with respect to unsheltered individuals in conjunction with the City Administrative Officer, Los Angeles Homeless Services Authority, Los Angeles City Housing Department, Los Angeles City Planning Department and any and all necessary departments and agencies.

**I FURTHER DIRECT** that the City coordinate its efforts to address this declared emergency with the County of Los Angeles, the State of California, and the federal government.

**I FURTHER DIRECT**, that the continuing state of emergency shall be regularly evaluated, in coordination with City Council, by reference to key performance indicators of progress in addressing the emergency, including, but not limited to:

- Decrease in the number and size of encampments;
- Regulatory relief from other jurisdictions and within Los Angeles City agencies to create flexibility to address the crisis;
- Relaxation in the restraints that limit the ability of the City's proprietary departments to create flexibility to address the crisis;
- Increased housing placements;
- Increased starts on new affordable housing options;
- An increase in temporary and permanent housing units;
- Increased outside aid through access to mental health and substance use beds;
- A decrease in the number of persons being evicted from existing housing units;
- A decrease in the number of persons falling into homelessness.

**I FURTHER DIRECT** that this Emergency Declaration sunset in six months subject to being renewed. The setting of a specific time frame allows for actions to be taken to make permanent, necessary structural changes.

**I FURTHER DIRECT** that all relevant City departments and agencies compile and deliver to the Mayor information about the specific and necessary resources and support that the

City should request from Los Angeles County, the State of California and the Federal government to address this crisis.

**I THEREFORE DIRECT** that the Declaration of Local Emergency shall take effect immediately and that notice shall be given of said Declaration through the most feasible means.



\_\_\_\_\_  
Karen Bass, MAYOR

Dated: December 12, 2022  
at Los Angeles, California  
Time: 9:00 a.m.

Filed with the City Clerk  
Date: December 12, 2022  
Time: 9:05 a.m.  
By: *Pat J. Luth*

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

0220-05151-0447


**Date:** April 20, 2023

**To:** Jimmy Kim, General Manager  
Department of Recreation And Parks

**Attn:** Darryl Ford, Superintendent of Planning and Construction  
Department of Recreation And Parks

**From:** Edwin Gipson II, Assistant City Administrative Officer  
Office of the City Administrative Officer

**Subject:** **REQUEST TO EXTEND A BRIDGE HOME SHELTER AT 3248 RIVERSIDE DR.**

 Digitally signed by Edwin  
Gipson II  
Date: 2023.04.19 17:44:08  
-07'00'

The A Bridge Home program (ABH) was created in response to the City Council declared shelter crisis on April 17, 2018 (C.F. 15-1138-S33) in an effort to provide shelter to people experiencing homelessness (PEH). On February 14, 2020, the site owned by the Department of Recreation and Parks (RAP) located at 3248 Riverside Dr. in Council District 4 was approved by the Council and Mayor (C.F. 19-0126) for an ABH shelter.

The Mayor declared a local emergency on December 12, 2022 (C.F. 22-1545), which aims to reduce the number of people experiencing homelessness citywide (approximately 41,980). In an effort to support the local emergency, the Homelessness Group within the Office of the City Administrative Officer requests to extend this site for one year and respectfully requests RAP to take any necessary actions or receive necessary approvals for this extension. The site information is as follows:

3248 Riverside Dr.

Service Provider: People Assisting the Homeless (PATH)

Bed Count: 100

Structure type: Sprung

Expiration date: July 9, 2023

Extension request: 1 year

Thank you for your assistance with this matter. If you have any questions about this request, please contact Kendra Leal, Senior Management Analyst II, at (213) 744-7354 or Annabelle Gonzales, Administrative Analyst, at (213) 978-2752.

cc: Meghan Luera, Senior Management Analyst I, RAP

COUNTY CLERK'S USE

**CITY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS  
BUREAU OF ENGINEERING  
1149 S. BROADWAY, 7<sup>th</sup> 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), and with the state Office of Planning and Research pursuant to Public Resources Code Section 21080.27(c) (AB1197), when applicable; and on the City website pursuant to Public Resources Code Section 21092.2(d). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

<b>LEAD CITY AGENCY AND ADDRESS:</b> City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b> 4
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<b>PROJECT TITLE:</b> Bridge Housing at 3428 Riverside Dr. Lease	<b>LOG REFERENCE</b> C.F. 19-0126 & TBD
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**PROJECT LOCATION:** 3428 Riverside Drive, in the Hollywood Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1, Project Location. T.G. 594-C2

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:** The Bridge Housing at 3428 Riverside Dr. Lease project (Project) consists of an extended, or new lease, for approximately up to one year with continued use/operation, for approximately up to four years total use of the temporary Bridge Housing facility. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide approximately up to one additional year, to the previously approved three years, of emergency shelter and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details.)

On \_\_\_\_\_, 2023, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

<b>CONTACT PERSON</b> Maria Martin (Maria.Martin@lacity.org)	<b>TELEPHONE NUMBER</b> (213) 485-5753
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<b>EXEMPT STATUS:</b>	<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

**JUSTIFICATION FOR PROJECT EXEMPTION:** This Project is statutorily exempt from CEQA under Public Resources Code, Section 21080(b)(4), as a specific action necessary to prevent or mitigate an emergency, and as reflected in Article 18 of the Sate CEQA Guidelines, Section 15269(c); and Public Resources Code, Section 21080.27 (AB 1197), applicable to City of Los Angeles emergency homeless shelters. This determination is consistent with the Notice of Exemption (NOE) supporting documents in Board of Recreation and Park Commission File No. 19-179 and Council File (CF) No. 19-0126; and consistent with, and supported by, the City Council's prior actions approving the development and use of this shelter (see attached narrative).

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

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

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**FIGURE 1: PROJECT LOCATION**





## EXEMPTION NARRATIVE

### I. PROJECT DESCRIPTION, CONTINUED

The Project consists of an approximately up to one-year lease extension or new lease, and operation, in furtherance of providing an emergency homeless shelter in the City of Los Angeles at the Bridge Housing facility located on a City-owned property at 3428 Riverside Drive that was found to be statutorily exempt and approved by The Board of Recreation and Park Commissioners on September 4, 2019 (Board Report No. 19-179) and subsequently by the City Council on December 10, 2019 (CF No. 19-0126). The documents supporting those determinations (Board Report No. 19-179 and CF No. 19-0126 a) are incorporated herein by reference as support for this CEQA determination. This Project continues the existing use of the facility, that was built, and is currently operating, without substantial change.

The approximately 100 bed shelter, which opened in July 2020, will continue to be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to, *Crisis Housing Program for All Populations Scope of Required Services* (LAHSA, 2020-2021). A third-party service provider, e.g., People Assisting the Homeless (PATH), will operate the Project for the City, as it has been for the past three years, and it is anticipated that a lease, lease extension, or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

Project operation continues per a security plan consistent with the LAHSA's standards. By creating a stable environment and providing access to basic needs, clients can maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing. The shelter will continue to be operated consistent with LAHSA program requirements for crisis and bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards, as noted in the references section.

The Project site consists of three irregular shaped lots with a combined area of approximately 180,341 square feet with frontage along Riverside Drive. The property is zoned OS-1XL-RIO which is a nonresidential zone that does allow for multifamily uses under certain circumstances. In addition, at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are residential uses to the north, south, and west of the site in addition to institutional and recreational facilities to the east. Therefore, the site meets the definition of infill site (City of Los Angeles Department of City Planning, 2023).

### 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. Based on information from the Census and the Los Angeles Homeless Services Authority (LAHSA),

in 2020, homeless persons constituted approximately 1.07 percent of the City's population (U.S Census Bureau, 2021 & LAHSA, 2020).

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

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

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

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (Commander Dominic H. Choi, 2019). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*). According to the LAPD Use of Force Year-End Report in 2020, among the 41,290 estimated homeless individuals throughout the City, 7,872 persons were reported to be victims of a violent or property crime. In the same year, 5,722 persons experiencing homelessness were reported as suspects of a violent or property crime. (LAPD, 2020). On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in

the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

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

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

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

*Access to Healthcare.* A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, 2010). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to

obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id.*).

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

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

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

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

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

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

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

Despite these efforts and the initial progress shown in 2018, the Homeless Counts unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2022) *Table 2 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Table 2 (LAHSA, 2020).

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

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

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

LAHSA prepared a 2021 shelter point-in-time count for the City of Los Angeles that estimated the number and demographic characteristics of the sheltered homeless population on a single night in January 2021. Released in July 20, 2021, it shows that the homelessness emergency in the City of Los Angeles continues unabated and uncertain. The documented number of individuals experiencing sheltered homelessness increased yet again, as shown in *Table 4 - 2021 Housing Inventory Count and Shelter Count Data Summary* (LAHSA, 2021). The 2021 unsheltered street count could not be conducted due to the COVID-19 pandemic. However, the availability of vaccinations enabled the resumption of the Homeless Count for February 2022 with appropriate precautions (LAHSA, 2022).

<b>Table 4</b>		
<b>2021 Housing Inventory Count and Shelter Count Data Summary</b>		
	<b>Number of Individuals</b>	<b>Change from 2020</b>
Sheltered Homeless	12,503	1% Increase

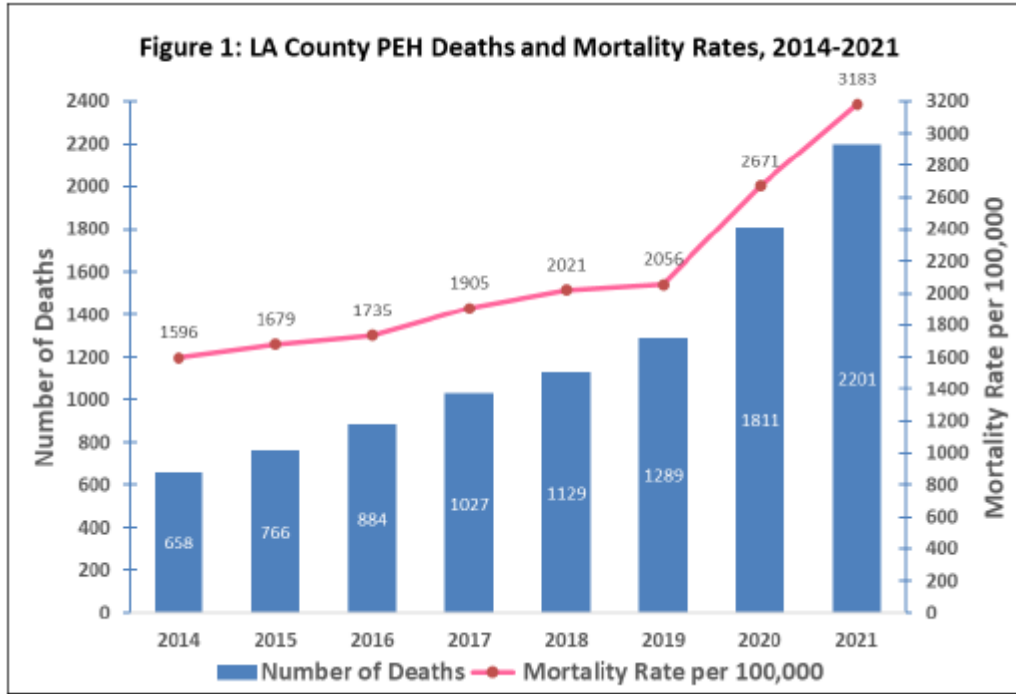
Homeless count data in 2022 showed the City’s homeless population continued to unexpectedly increase 1.7% from 41,290 to 41,980 persons, and while its sheltered population increased 8.7%, its unsheltered population only decreased 1.4%. (LAHSA, 2022.)

Taken together, the City faces an unexpected and dramatic increase in homelessness, which was exacerbated by the COVID-19 pandemic beginning in early 2020 posing a critical emergency situation in the City of Los Angeles.

On December 12, 2022, Mayor Bass declared a homelessness emergency in the City of Los Angeles, specifically stating that the Mayor “declare[s] the existence of a local emergency and direct[s] all Divisions of the Emergency Operations Organization (EOO) and all other City Departments to take necessary steps for the protection of life, health and safety in the City of Los Angeles.” (City of Los Angeles, Dec. 12, 2022.) The Mayor’s declaration discussed how the homelessness crisis created a dramatic unanticipated impact on the population, and how it displaced people even greater than major hurricanes and earthquake events, all of which are emergencies requiring prompt action to avoid clear and imminent danger to the displaced populations.

### **C. Unexpected Dramatic Increase in Homeless Population Mortality**

A report released in May 2023 by the Los Angeles County Department of Public Health found that indicators of mortality in the homeless population “began increasing dramatically beginning in 2020, with the mortality rate increasing by 55% between 2019 and 2021.” (LA County DPH May 2023.)



(Source: LA County DPH May 2023.)

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

This situation presents documented dangers to health, life, and property, and a burden on, and a loss of access to, essential public services, 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 dramatic rise in the homeless population is a sudden unexpected occurrence, as is the unexpected and sudden occurrence of losing access to adequate shelter and essential services for each individual newly experiencing homelessness, as is the unexpected rise in mortality rates among the homeless population since 2019. Each is an emergency presenting impending acute harm to the individuals experiencing homelessness that would be prevented and mitigated through providing housing to those individuals, including through the emergency shelter provided by this Project. The Project, therefore, is exempt from CEQA environmental review pursuant to Section 21080(b)(4) since it prevents and mitigates such imminent loss and damage.

**B. 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 100 beds for individuals experiencing homelessness. 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 sleeping space with partitions around beds in a dormitory setting. There are separated sleeping spaces with private and/or communal bathrooms. Therefore, the project is managed and designed to allow the privacy of participants, which allows for the presence of partners, 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 the 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 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 service 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 destinations 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**

The Project site is zoned OS-1XL-RIO, which is a nonresidential zone that allows for multifamily uses under certain circumstances, and thus the Project's location qualifies for the exemption. In addition, the Project is qualified as an infill site location because the site is currently developed with a bridge housing facility, and at least 75% of the perimeter of the site is surrounded by qualified urban uses. There are residential uses to the north, south, and west of the site in addition to institutional and recreational facilities to the east, and therefore, the Project site is surrounded by qualified urban uses and is considered a qualified location under AB 1197. (City of Los Angeles Department of City Planning, 2023)

#### **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 City identified and allocated Homeless Housing, Assistance and Prevention (HHAP) funds for the construction operation of this Bridge Housing facility and has determined that the Project is a homeless shelter project that used funding sources identified in AB 1197, which further qualifies this Project for the exemption under AB 1197. Because the Project is partly funded by a qualified funding source under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement is met.

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

AB 1197 (Public Resources Code Section 21080.27(b)(1)), exempts from CEQA “any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles.” This Project involves a lease or other agreement, and continued operation of an existing bridge housing. The City will provide funding and enter into contracts with a qualified service provider, e.g., PATH, and/or LAHSA, to lease and operate the emergency shelter. Therefore, the City’s actions are in furtherance of providing emergency shelters in the City of Los Angeles and qualify for exemption from CEQA under AB 1197.

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

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



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