

APPROVED
June 09, 2025
**BOARD OF RECREATION
AND PARK COMMISSIONERS**

BOARD REPORT

NO. 25-094

DATE June 09, 2025

C.D. 15

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: KEN MALLOY HARBOR REGIONAL PARK – COUNCIL DISTRICT 15 TINY HOMES VILLAGE PROJECT – EXTENSION OF USE OF A PORTION OF THE PARK FOR A TEMPORARY HOMELESS SHELTER FACILITY FOR A PERIOD NOT TO EXCEED ONE YEAR – STATUTORY EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO GOVERNMENT CODE SECTION 8698.4(a)(4) APPLICABLE TO A HOMELESS SHELTER PROJECT DURING A DECLARED SHELTER CRISIS AND PUBLIC RESOURCES CODE SECTION 21080.27.5 APPLICABLE TO CITY LOW BARRIER NAVIGATION CENTER PROJECTS FOR PERSONS EXPERIENCING HOMELESSNESS

B. Aguirre	_____	M. Rudnick	_____
B. Jones	_____	for* C. Santo Domingo	<u>DF</u>
C. Stoneham	_____	N. Williams	_____



General Manager

Approved X Disapproved Withdrawn

RECOMMENDATIONS

1. Find that the continued use for an additional period not to exceed one year of operation for a total term of operation of five years of a portion of the Department of Recreation and Park's (RAP) Ken Malloy Harbor Regional Park located at 1221 Figueroa Place, Wilmington, California 90744 (Los Angeles County Assessor's Parcel No. 7412-010-903), as a temporary homeless shelter site to address the City's declared shelter crisis is consistent with the use of a portion of Ken Malloy Harbor Regional Park for park purposes;
2. Approve the Council District Fifteen (CD15) Ken Malloy Harbor Regional Park Pallet Shelter Homeless Project (Project), as further described in the summary of this Report and as previously approved in Board Report Nos. 20-179 and 24-084, for an additional period not to exceed one 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 Project for a period not to exceed one year of operation;

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4. Direct RAP staff to include provisions in any ROE permit issued pursuant to this Report that requires the City Administrative Officer to provide the Board of Recreation and Park Commissioners with a written and verbal report with performance review information of the Project annually, as part of a consolidated report that addresses all active interim housing programs on RAP property. The report data shall be drawn from information and metrics already collected, including, but not limited to the number of client intakes, the number of client exits, the number of client housing placements, shelter occupancy, and other pertinent information requested by RAP;
5. Determine the Project is statutorily exempt from CEQA pursuant to Government Code Section 8698.4(a)(4) covering a City Homeless Shelter project during a declared City shelter crisis and pursuant to Public Resources Code Section 21080.27.5, applicable to leasing, providing financial support, constructing, operating, or contracts to provide services related to City low barrier navigation centers for people experiencing homelessness;
6. Request that Bureau of Engineering (BOE) staff file a Notice of Exemption (NOE) with the Los Angeles County Clerk and the Governor's Office of Land Use and Climate Innovation; and
7. Authorize RAP's General Manager, or designee, to make technical corrections as necessary to carry out the intent of this Report.

SUMMARY

Background

In April 17, 2018, the City Council (CF No. 15-1138-S33), with the support of Mayor Garcetti, unanimously voted to declare an emergency shelter crisis in the City of Los Angeles ("Shelter Crisis Declaration"). The Shelter Crisis Declaration remains in effect to the present. Government Code section 8698.4 provides that during a declared shelter crisis, "provisions of any housing, health, habitability, planning and zoning, or safety standards, procedures, or laws shall be suspended for homeless shelters, provided that the city . . . has adopted health and safety standards and procedures for homeless shelters consistent with ensuring minimal public health and safety and those standards are complied with." The City has adopted such minimal public health and safety standards. Therefore, the City is able to establish and support ongoing homeless shelters without regarding to the City's planning and zoning laws, among others. As a result, the City may establish a homeless shelter on property owned or leased by the City of Los Angeles in any zone without limits of City planning requirements.

Section 8698.4 defines "Homeless Shelter" as "a facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless that is not in existence after the declared shelter crisis. A temporary homeless shelter community may include supportive and self-sufficiency development services. A "homeless shelter" shall include a parking lot owned or leased by a city, county, or city and county specifically identified as one allowed for safe parking by homeless and unstably housed individuals."

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On May 30, 2018, Mayor Garcetti issued Executive Directive No. 24 which directed fifteen City Departments to prioritize and facilitate the construction of temporary emergency homeless shelters, which are also called “Bridge Housing.” Although, RAP was not one of the fifteen City Departments named in the subject directive, RAP, with its over 450 parks, was asked to contribute to alleviating the shelter crisis within the City of Los Angeles.

Temporary Homelessness Facility at Ken Malloy Harbor Regional Park

Ken Malloy Harbor Regional Park is located at 25820 Vermont Avenue in the San Pedro area of the City. This 290.87-acre park provides picnic areas, a walking/jogging trail, a lake, swimming pool, multipurpose fields, golf course, and children’s play areas for the community. Approximately 9,572 City residents live within a one-half mile walking distance of Ken Malloy Harbor Regional Park. Due to the facilities, features, programs, and services it provides, Ken Malloy Harbor Regional Park meets the standard for a Regional Park, as defined in the City’s Public Recreation Plan.

On September 17, 2020, the Board of Recreation and Park Commissioners (Board) approved the installation and operation of a temporary homeless facility (Shelter) at 1221 Figueroa Place, for a period of three years (Report No. 20-179). The Project site is located on a portion of the Park measuring approximately 1.1 acres or 47,800 square feet. The area was an underutilized portion of a parking lot within the Harbor Sports Complex of the Park.

The Project provides shelter and services for up to 150 homeless individuals. The site includes seventy-three 8’x8’ Pallet Shelters with double beds, four Pallet Shelters with American with Disabilities Act compliant single beds, two 7’x26’ Hygiene Mobile Units, one 8’x20’ modular shipping container offices, two 10’x10’ Pallet for storage and one Pallet for food preparation. The site also includes seating, an eating area with picnic tables, fencing and umbrellas for shade.

On June 23, 2021, 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 years. The ROE permit between RAP and GSD expires on June 22, 2024.

On April 18, 2024, the Board approved a one-year extension for the continued operation of the Shelter at the request of the Office of the City Administrator (Report No. 24-084). RAP and GSD executed an amendment to the previously issued ROE permit to extend the term to June 22, 2025.

On April 29, 2025, the Office of the City Administrator (CAO) has requested that RAP extend the operation of the Shelter (Attachment 2).

The Office of Council District 15 is supportive of the continued operation of the Shelter and reiterates the continued existence of a shelter crisis.

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

ENVIRONMENTAL IMPACT

The proposed Project consists of an additional year's use of a parking lot on City park land within the Harbor Sports Complex for the continued operation of a homeless shelter, City funding of the Project, and an agreement with an operator of the Project.

Government Code Section 8698.4, governing homeless shelter projects during a declared shelter crisis, exempts from CEQA actions taken by a city or other local government, to lease, convey, or encumber land owned by a local government for homeless shelters.

Public Resources Code (PRC) Section 21080.27.5, exempts leasing, providing financial support, constructing, operating, or entering into contracts to provide services to a low barrier navigation center from the California Environmental Quality Act (CEQA).

Based on these considerations, staff recommends that the Board determine that the Project is statutorily exempt from CEQA environmental review pursuant to Government Code Section 8698.4 and PRC 21080.27.5. Bureau of Engineering staff will publish the NOE on their website and file a Notice of Exemption (NOE) with the Los Angeles County Clerk and the Governor's Office of Land Use and Climate Innovation upon Board's approval.

FISCAL IMPACT

The approval of this Report will have no fiscal impact to RAP's general fund. RAP is not responsible for the operation and maintenance costs associated with the shelter.

This Report was prepared by Robert Eastland, Management Assistant, Planning, Maintenance and Construction Branch.

ATTACHMENTS

- 1) Attachment 1 – Report No. 24-084
- 2) Attachment 2 – Memo from the Office of the City Administrative Officer Dated April 29, 2025

APPROVED

APR 18 2021

BOARD OF RECREATION AND PARK COMMISSIONERS

BOARD REPORT

NO. 24-084

DATE April 18, 2024

C.D. 15

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: KEN MALLOY HARBOR REGIONAL PARK – COUNCIL DISTRICT 15 TINY HOMES VILLAGE PROJECT – EXTENSION OF EMERGENCY USE OF A PORTION OF THE PARK FOR A TEMPORARY HOMELESS SHELTER FACILITY FOR A PERIOD NOT TO EXCEED ONE YEAR – STATUTORY EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO CALIFORNIA PUBLIC RESOURCES CODE SECTION 21080.27 AND GOVERNMENT CODE SECTION 65660(b) APPLICABLE TO CITY OF LOS ANGELES LOW BARRIER NAVIGATION CENTERS, GOVERNMENT CODE SECTION 8698.4 GOVERNING HOMELESS SHELTER PROJECTS UNDER A SHELTER CRISIS DECLARATION, AND CALIFORNIA PUBLIC RESOURCES CODE SECTION 21080(b)(4) AND STATE CEQA GUIDELINES SECTION 15269(c) AS SPECIFIC ACTIONS NECESSARY TO PREVENT OR MITIGATE AN EMERGENCY

B. Aguirre _____ for M. Rudnick _____
B. Jones _____ * C. Santo Domingo DF
C. Stoneham _____ N. Williams _____



General Manager

Approved X Disapproved _____ Withdrawn _____

RECOMMENDATIONS

1. Find that the continued emergency use for an additional period not to exceed one year of operation for a total term of operation of four years of a portion of the Department of Recreation and Park's (RAP) Ken Malloy Harbor Regional Park located at 1221 Figueroa Place, Wilmington, California 90744 (Los Angeles County Assessor's Parcel No. 7412-010-903), as a temporary homeless shelter site, is consistent with the use of a portion of Ken Malloy Harbor Regional Park for park purposes;
2. Approve the Council District (CD) Fifteen (15) Ken Malloy Harbor Regional Park Pallet Shelter Homeless Project (Project), as further described in the summary of this Report and as previously approved in Board Report 20-179, for an additional period not to exceed one year of operation;
3. Authorize RAP's General Manager or designee to issue a license to the Department of General Services (GSD) and/or any designated City Department for the operation, security and maintenance of the Project for a period not to exceed one year of operation;

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4. Determine that the lease and continued use and operation of the facility are statutorily exempt from CEQA under California Public Resources Code (CPRC) Section 21080.27 and Government Code Section 65660(b) applicable to City of Los Angeles low barrier navigation centers, Government Code Section 8698.4 governing homeless shelter projects under a shelter crisis declaration, and CPRC Section 21080(b)(4) and State CEQA Guidelines Section 15269(c) as a specific action necessary to prevent or mitigate an emergency;
5. Request the Department of Public Works, Bureau of Engineering (BOE) to file a Notice of Exemption (NOE) with the Los Angeles County Clerk's Office within five working days of approval of this Report, file the NOE with the State Clearinghouse, and publish it on the BOE website; and
6. Authorize RAP's General Manager, or designee, to make technical corrections as necessary to carry out the intent of this Report.

SUMMARY

Homelessness Emergency in the City of Los Angeles

In April 17, 2018, the City Council (CF) No. 15-1138-S33, with the support of the Mayor, unanimously voted to declare an emergency shelter crisis in the City of Los Angeles. With this declaration and pursuant to Los Angeles Municipal Code (LAMC) 12.80 and 12.81, shelters may now be established and operated on non-governmental property as well as property owned or leased by the City of Los Angeles in any zone without limits.

On May 30, 2018, Mayor Garcetti issued Executive Directive No. 24 which directed fifteen City Departments to prioritize and facilitate the construction of temporary emergency homeless shelters, which are also called "Bridge Housing." Although, RAP was not one of the fifteen City Departments named in the subject directive, RAP, with its over 450 parks, was asked to contribute to alleviating the emergency shelter crisis within the City of Los Angeles.

On December 12, 2022, Mayor Karen Bass declared a state of emergency on homelessness (Attachment 2). Mayor Bass subsequently 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. Further, on May 16, 2023, the City Council extended the declaration of the state of local emergency on homelessness until June 12, 2023.

Ordinance 187,922, which became effective on July 5, 2023, added Section 8.33 to Article 3, Chapter 3, Division 8 of the Los Angeles Administrative Code (LAAC) which empowers the Mayor to declare a local housing and/or homeless state of emergency when certain criteria are met. Per LAAC 8.33, "Upon the Mayor's declaration of a local housing and/or homelessness emergency, the Mayor shall coordinate citywide planning and response with respect to unsheltered or unhoused individuals in conjunction with the City Administrative Office, Los Angeles Homeless

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Services Authority, Los Angeles City Housing Department, Los Angeles City Planning Department, and all other necessary departments and agencies. The Mayor shall also coordinate the City's efforts to address a declared emergency under this section with the County of Los Angeles, the State of California, and the federal government. Within 30 days, the Mayor shall submit to the City Council a plan of action to address the emergency." The City Council shall receive a resolution within 30 days from the date of the original declaration of the Mayor, which the Council may consider and rescind by majority vote. Thereafter, the declaration shall expire unless the City Council renews it by majority vote every 90 calendar days.

On July 7, 2023, the Mayor made a declaration of local housing and homelessness emergency per the authority granted under LAAC 8.33 (CF No. 22-1545 and 23-0652-S1) (Attachment 3). The declaration of local housing and homeless state of emergency was renewed on January 24, 2024 and remains in effect until April 28, 2024.

Temporary Homelessness Facility at Ken Malloy Harbor Regional Park

Ken Malloy Harbor Regional Park is located at 25820 Vermont Avenue in the San Pedro area of the City. This 290.87-acre park provides picnic areas, a walking/jogging trail, a lake, swimming pool, multipurpose fields, golf course, and children's play areas for the community. Approximately 9,572 City residents live within a one-half mile walking distance of Ken Malloy Harbor Regional Park. Due to the facilities, features, programs, and services it provides, Ken Malloy Harbor Regional Park meets the standard for a Regional Park, as defined in the City's Public Recreation Plan.

On September 17, 2020, the Board of Recreation and Park Commissioners (Board) approved the installation and operation of a temporary homeless facility (Shelter) at 1221 Figueroa Place, for a period of three years (Report No. 20-179). The Project site is located on a portion of the Park measuring approximately 1.1 acres or 47,800 square feet. The area was an underutilized portion of a parking lot within the Harbor Sports Complex of the Park.

The Project provides shelter and services for up to 150 homeless individuals. The site includes seventy-three 8'x8' Pallet Shelters with double beds, four Pallet Shelters with American with Disabilities Act (ADA) compliant single beds, two 7'x26' Hygiene Mobile Units, one 8'x20' modular shipping container offices, two 10'x10' Pallet for storage and one Pallet for food preparation. The site also includes seating, an eating area with picnic tables, fencing and umbrellas for shade.

On June 23, 2021, RAP issued a right-of-entry (ROE) permit to GSD for the operation of the Shelter for a period of three years. The ROE permit between RAP and GSD expires on June 22, 2024.

On March 12, 2024, the Office of the City Administrator (CAO) has requested that RAP extend the operation of the Shelter (Attachment 4).

The Office of Council District 15 is supportive of the continued operation of the Shelter.

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

ENVIRONMENTAL IMPACT

The proposed Project consists of the lease and continued use of a temporary homeless shelter and personal storage site. The Project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City's already dangerously large homeless population, also adversely impacted by the COVID-19 pandemic. The dramatic rise in the homeless population is a sudden unexpected occurrence, as it results from the unexpected and sudden loss of access to adequate shelter and essential services for each individual newly experiencing homelessness. Each such loss is an emergency presenting impending acute harm to the individuals experiencing homelessness that would be prevented and mitigated through providing housing to those individuals, including through the emergency shelter/low barrier navigation center provided by this Project. The Project, therefore, is exempt from California Environmental Quality Act (CEQA) environmental review pursuant to California Public Resources Code (CPRC) Section 21080(b)(4), which provides that CEQA does not apply to "specific actions necessary to prevent or mitigate an emergency." CPRC 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."

Furthermore, State CEQA Guidelines Section 15269, "Emergency Projects," provides examples of emergency projects exempt from the requirements of CEQA, including the following:

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.

On December 12, 2022, Mayor Bass declared a homelessness emergency in the City of Los Angeles, which declaration was ratified by the City Council (CF No. 22-1545). On July 7, 2023, Mayor Bass again declared a local housing and homelessness emergency because "the City still finds itself in an emergency" with emergency conditions continuing to require prompt abatement due to the severe shortage of beds available to the unhoused population. California Government Code Section 8698.4(a)(4) provides that CEQA "shall not apply" to actions taken by a city upon the declaration of a shelter crisis "to facilitate the lease, conveyance, or encumbrance of land owned by the local government for, or to provide financial assistance to, a homeless shelter constructed or allowed by this section."

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Assembly Bill 1197 (Santiago, 2019) signed into law on September 26, 2019, adopted CPRC Section 21080.27 and created a statutory exemption for compliance with CEQA for emergency shelter projects located within the City of Los Angeles; CPRC Section 21080.27 was recently amended by Assembly Bill 785 (Santiago, 2023) to exempt a broader set of activities undertaken by the City to promote affordable housing and address homelessness.

Based on these considerations, staff recommends that the Board determines that the proposed Project is statutorily exempt from CEQA pursuant to CPRC Section 21080.27 and Government Code Section 65660(b) applicable to City of Los Angeles low barrier navigation centers, Government Code Section 8698.4 governing homeless shelter projects under a shelter crisis declaration, and CPRC Section 21080(b)(4) and State CEQA Guidelines Section 15269(c) as a specific action necessary to prevent or mitigate an emergency. Staff also recommends the Board request that the Bureau of Engineering (BOE) file a Notice of Exemption (NOE) with the Los Angeles County Clerk, file the NOE with the State Clearinghouse, and publish it on the BOE website.

FISCAL IMPACT

The approval of this Report will have no fiscal impact to RAP's general fund. RAP is not responsible for the operation and maintenance costs associated with the shelter.

This Report was prepared by Robert Eastland, Management Assistant, Planning, Maintenance and Construction Branch.

ATTACHMENTS

- 1) Attachment 1 – Report No. 20-179
- 2) Attachment 2 – Declaration of State of Emergency Dated December 12, 2022
- 3) Attachment 3 – Declaration of Local Housing and Homelessness Emergency Dated July 7, 2023
- 4) Attachment 4 – Memo from the Office of the City Administrative Officer Dated March 12, 2024

APPROVED
SEP 17 2020

BOARD OF RECREATION
AND PARK COMMISSIONERS

BOARD REPORT

NO. 20-179

DATE September 17, 2020

C.D. 15

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: KEN MALLOY HARBOR REGIONAL PARK – PROPOSED CD15 TINY HOMES VILLAGE PROJECT – PROPOSED EMERGENCY USE OF A PORTION OF THE PARK FOR THE CONSTRUCTION OF AND USE AS A TEMPORARY HOMELESS SHELTER FACILITY FOR A PERIOD NOT TO EXCEED THREE (3) YEARS OF OPERATION – 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 PREVENT OR MITIGATE AN EMERGENCY] REFLECTED IN CALIFORNIA CEQA GUIDELINES SECTION 15269(c) AS WELL AS PRC SECTION 21080.27 [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] AND CALIFORNIA GOVERNOR'S ORDER N. 32-20 [SUSPENSION OF DIVISION 13, COMMENCING WITH SECTION 21000, OF THE PUBLIC RESOURCES CODE AND REGULATIONS ADOPTED PURSUANT THAT DIVISION FOR ANY PROJECT USING HOMELESS EMERGENCY AID PROGRAM FUNDS, HOMELESS HOUSING, ASSISTANCE AND PREVENTION PROGRAM FUNDS OR FUND APPROPRIATED IN SENATE BILL 89, SIGNED ON MARCH 17, 2020]

AP Diaz

H. Fujita

V. Israel

S. Piña-Cortez

C. Santo Domingo

N. Williams



General Manager

Approved X
With Correction

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) Ken Malloy Harbor Regional Park (Exhibit A) located at 1221 Figueroa Place, Wilmington, California 90744 (Los Angeles County Assessor's Parcel No. 7412-010-903), as a temporary homeless shelter site, is consistent with the use of a portion of Ken Malloy Harbor Regional Park (Park) for park purposes;
2. Approve the proposed construction of the CD 15 Tiny Homes Village Project (Project) on a portion of the Department's Park as further described in the Summary of this Report, and its operation for a period not to exceed three (3) years;

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3. Approve design plans, substantially 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 the 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;~~
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, construction and other works related to the installation of the proposed Project at the Park;
6. Authorize RAP's General Manager or designee, which may include another City Department, to issue a license to a housing operator 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)[Specific actions to prevent or mitigate an emergency], as reflected in California CEQA Guidelines Section 15269(c), PRC Section 21080.27 [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] and California Governor's Order N. 32-20 [Suspension of Division 13, commencing with Section 21000, of the Public Resources Code and regulations adopted pursuant that Division for any project using Homeless Emergency Aid Program Funds, Homeless Housing Assistance and Prevention Program Funds or Fund Appropriated in Senate Bill 89, signed on March 17, 2020]; and,
8. Request the Bureau of Engineering to file a Notice of Exemption (NOE) within five (5) working days of approval with the Office of Planning and Research (OPR) and the Los Angeles County Clerk's Office.

SUMMARY

Declaration of an Emergency Shelter Crisis in the City of Los Angeles

In April 17, 2018, City Council, through Council File (CF) No. 15-1138-S33, and with the support of the Mayor, unanimously voted to declare an emergency shelter crisis in the City of Los Angeles. With this declaration and pursuant to Los Angeles Municipal Code (LAMC) 12.80 and 12.81, shelters could now be established and operated on non-governmental property as well as property owned or leased by the City of Los Angeles in any zone without limits.

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On May 30, 2018, Mayor Garcetti issued Executive Directive No. 24 which directed 15 City Departments to prioritize and facilitate the construction of temporary emergency homeless shelters also called Bridge Housing. Although, RAP was not one of the 15 City Departments named in the subject directive, RAP, with its over four hundred fifty (450) parks, was asked to contribute to alleviate the emergency shelter crisis within the City of Los Angeles.

On March 20, 2019, the Board of Recreation and Park Commissioners (Board), through Report No. 19-062, approved the construction and operation of a temporary homeless shelter and storage facility on a 0.7 acre or 30,127 square feet portion of RAP's Lafayette Park. Subsequently, on September 4, 2019, the Board, through Report No. 19-179, approved the construction and operation of a second temporary homeless shelter and storage facility on a 0.65 acre or 28,500 square feet portion of RAP's Griffith Park on Riverside Drive. The Griffith Park-Riverside Drive shelter was completed in June and operations began on July 8. The Lafayette Shelter is currently in construction and is anticipated to be completed by November.

On August 6, 2020, the Board, through Report No. 20-160, approved the construction and operation of a temporary Tiny Homes Village homeless shelter on a 0.5 acre or 21,705 square-foot portion of RAP's North Hollywood Park on Chandler Boulevard. On this same date, the Board, through Report No. 20-161, approved the construction and operation of a second temporary Tiny Homes Village homeless shelter on a 1.72 acre or 75,000 square-foot portion of RAP's Valley Plaza Park on Laurel Canyon Drive.

LA Alliance for Human Rights vs. City of Los Angeles

In June 2020, the City of Los Angeles (City) and the County of Los Angeles (County) reached an agreement to provide housing and services for up to 6,700 homeless people who live near freeways and those over 65 years of age or vulnerable to COVID-19. This agreement was approved by a federal judge related to a lawsuit filed in March 2020 by the Los Angeles Alliance for Human Rights which accused the City of Los Angeles of failing to comprehensively address the homeless crisis.

Under the agreement, the City will provide 6,700 beds within eighteen (18) months and the County will provide up to \$300 million over the next five (5) years to fund homeless services. The County also agrees to pay the City a one-time bonus fee of \$8 million if 5,300 beds are available within ten (10) months.

As indicated earlier in this report, the Board approved two (2) homeless pallet shelters at North Hollywood Park and Valley Plaza Park at its meeting held on August 6, 2020. This Project would be the third pallet shelter that the Board would be considering. All three (3) locations have been evaluated by RAP staff in cooperation with other City staff. It should be noted that the Office of Councilmember Joe Buscaino is supportive of the Project location. Further, due to COVID-19, the urgency to address the public health and safety conditions, and the timeline set forth in the court-approved agreement extensive community outreach has not been conducted.

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The portion of the Park proposed for this project measures approximately 1.1 acres or 47,800 square-feet (see Exhibit B). This area is in an underutilized portion of a parking lot within the Harbor Sports Complex of the Park. It is immediately adjacent to a sports field and a ground mounted solar array.

The proposed Project will provide shelter and services for up to 150 homeless individuals. The scope of work will include seventy three 8'x8' Pallet Shelters with double beds, four (4) with American with Disabilities Act compliant single beds, two (2) – 7'x26' Hygiene Mobile Units, one (1) – 8'x20' modular shipping container offices, two (2) 10'x10' Pallet for storage and one Pallet for food preparation. The site will also accommodate seating, an eating area with picnic tables, fencing and umbrellas for shade.

The proposed Project is unique in its use of pallet shelters as habitable structures. Pallet shelters are small, white rectangular structures constructed with a fiberglass material and an aluminum frame. These shelters come in two sizes: a (8'x8') 64-square-foot and a (10'x10') 100-square-foot model. These can be set up with little to no tools in under an hour. They come with a fold-up bed, windows, a ventilation system, and a front door that locks. They are an "Ikea approach to shelter," as the shelter comes in pieces that are assembled on site (see Exhibit C).

Advantages to the use of pallet shelters include the fact that they are prefabricated and can easily be built in less than one hour with minimal tools. The shelters can be outfitted with beds, climate control, safety features, electricity, and more. They can be ready for resident move-in within a short amount of time.

ENVIRONMENTAL IMPACT

The proposed Project consists of the new construction of a temporary homeless shelter and is meant to prevent or mitigate the conditions arising from a sudden and unexpected dramatic rise in the City's already dangerously large homeless population. City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018. The 2020 Homeless population count shows an unexpected and unabated dramatic surge in homelessness, and finds that the number of people experiencing homelessness in the City has increased by 16.1% since 2019, while the unsheltered homeless population has increased by 8.4%. Studies illustrated in the Notice of Exemption (Attachment 4) show the burden that homelessness imposes to life, health, property, and to essential public services in the City. Furthermore, the City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City's homeless population. In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. 20-cv-02291-DOC concerning homelessness, the Court entered a May 2020 injunction, which has since been vacated for other reasons, recognizing that the combined risks of health impacts from living near freeways and the on-going COVID-19 pandemic constitute an emergency.

BOARD REPORT

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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 sudden and unexpected dramatic rise in the City’s already dangerously large homeless population, now adversely impacted by the COVID-19 pandemic— need not be sudden or unexpected to qualify as statutorily exempt from CEQA compliance.

Based on these considerations, 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.

On September 27, 2019, the California Legislature approved AB 1197, which introduces Section 21080.27 of the California PRC. Section 21080.27 exempts from the requirements of CEQA certain activities approved or carried out by the City of Los Angeles and other eligible public agencies, related to supportive housing and emergency shelters. As described in Attachment 4, the proposed project responds to the requirements listed in AB 1197, therefore, staff recommends that the Board determine that it is exempt from the provisions of CEQA pursuant PRC Section 21080.27.

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

City Staff will file a Notice of Exemption (NOE) with the Office of Planning and Research (OPR) and with the Los Angeles County Clerk should the Board grant this 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 RAP’s general fund.

BOARD REPORT

PG. 6 NO. 20-179

This Report was prepared by Cid Macaraeg, Sr. Management Analyst II, Planning, Construction and Maintenance Branch.

LIST OF ATTACHMENTS/EXHIBITS

Attachment 1 – Map of Ken Malloy Harbor Regional Park

Attachment 2 – Concept Plan for Ken Malloy Harbor Regional Park Tiny Village Shelter

Attachment 3 – Generic Pallet Shelter Exhibit

Attachment 4 – Notice of Exemption for Ken Malloy Harbor Regional Park – Proposed CD15 Tiny Homes Village Housing Project



EQUITABLE PARKS & AMENITIES DECISION SUPPORT SYSTEM

Ken Malloy Harbor Regional Park - CD 15 Tiny Home Village



Disclaimer: This map is for informational purposes only and relies on data from a variety of sources, which may or may not be accurate or current. The City of Los Angeles assumes no responsibility arising from the use of this map. The map and associated data are provided "as is" without warranty of any kind.

© City of Los Angeles, Department of Recreation and Parks



SCALE 1: 9,028

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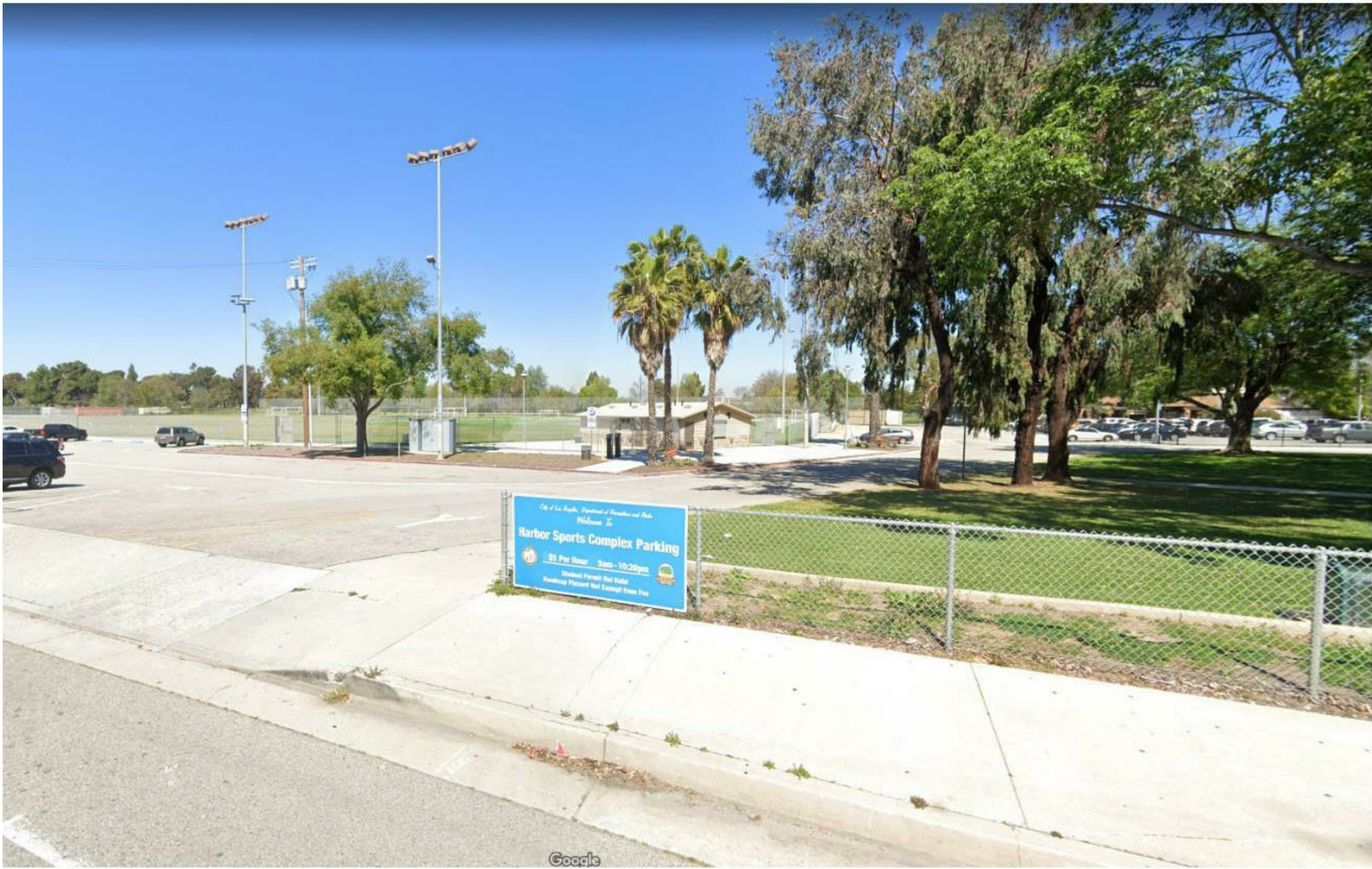
NOTES



Printed: 09/02/2020

SHELTER AND HOUSING PROGRAM
1221 FIGUEROA PLACE





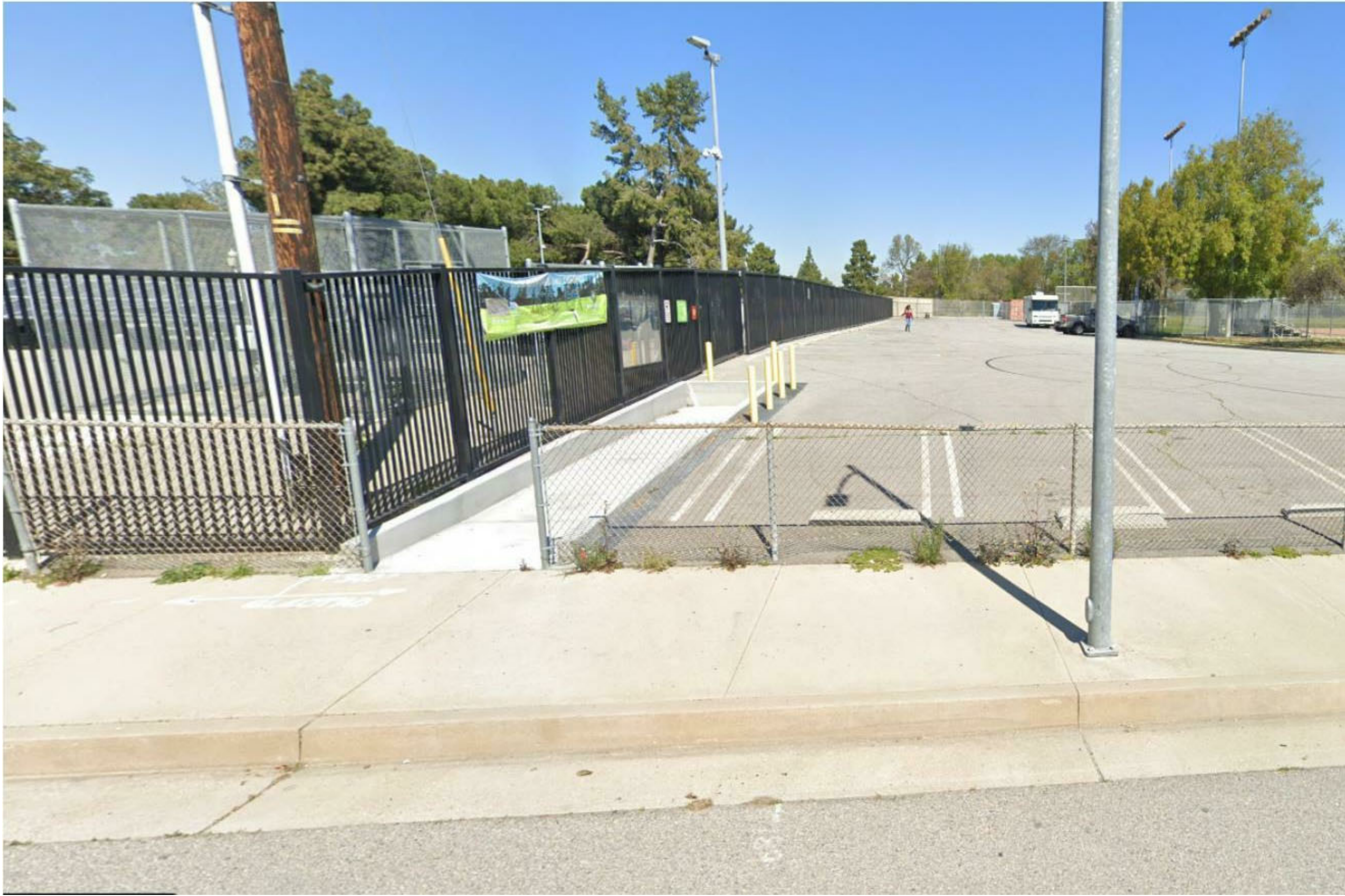
ENTRANCE AT EAST SIDE OF THE PARK



LOOKING WEST ALONG L STREET



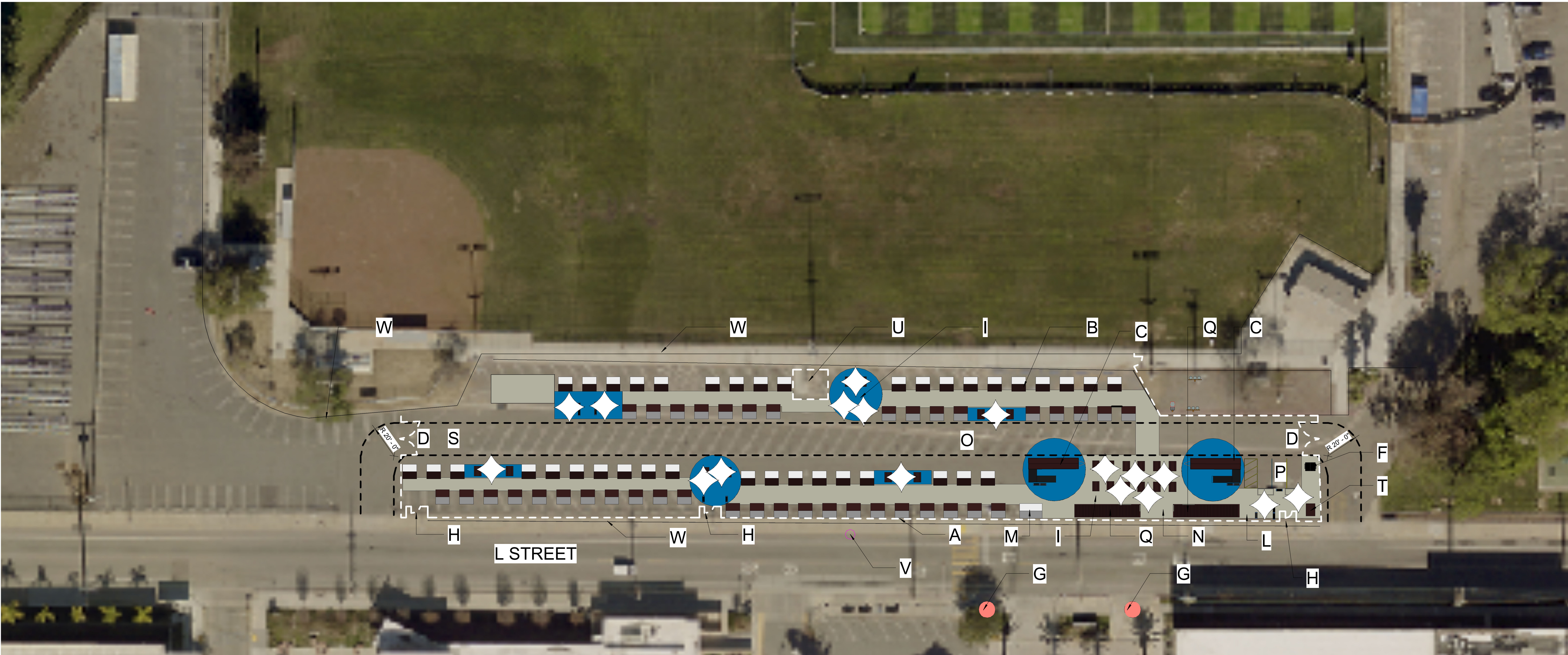
ENTRANCE AT WEST SIDE OF THE PARKING LOT



ACCESS TO RAP PHOTOVOLTAIC AREA

BUREAU OF ENGINEERING		ENGINEERING		CITY OF LOS ANGELES	
CITY OF LOS ANGELES		DEPARTMENT OF PUBLIC WORKS		CITY ENGINEER	
Y LEE MOORE, PE, ENV SP		SITE PHOTOS		CD 15 TINY HOME VILLAGE	
1221 FIGUEROA PLACE		COUNCIL DISTRICT: 15		G003	
		DATE: 8/31/20		MQ	
		DRAWN BY: AK		Scale:	
		CHECKED BY:		AK	
A Bridge Home					





1221 FIGUEROA PLACE, WILMINGTON 90744

OVERALL SITE PLAN
1" = 30'-0"

PROJECT SCOPE:
NEW HOMELESS TINY HOME PROJECT IN AN EXISTING PARKING LOT OWNED BY RECREATION AND PARKS

THE PROJECT WILL PROVIDE BEDS TO 150 INDIVIDUALS. SITE AMENITIES INCLUDE MOBILE HYGIENE UNITS WITH RESTROOM, SHOWERS, LAVATORIES, AND DRINKING FOUNTAINS; DESIGNATED SEATING AREAS WITH MOBILE UMBRELLAS FOR FOOD SERVICES; A PRE FABREICATED STRUCTURE FOR ADMINISTRATIVE OFFICES AND LAUNDRY, ALONG WITH PERIMETER SECURITY FENCING.

PROPOSED SHELTER PROGRAM: APPROX 47,800 SF

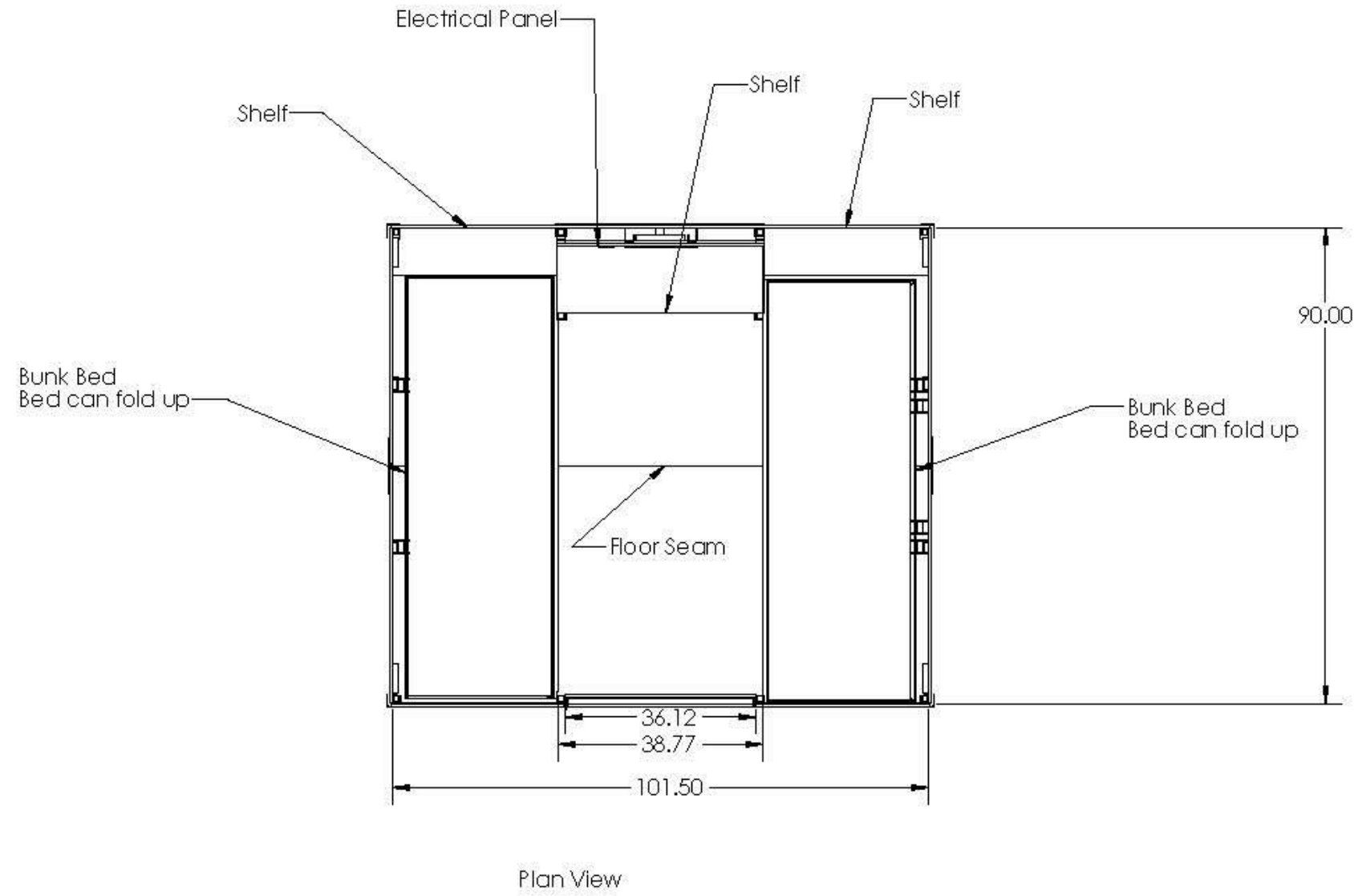
- 78 PALLET HOUSES MAX: 150 BEDS
 - 73 DOUBLE 8x8 (146 OCCUPANTS)
 - 4 ACCESSIBLE 8x8 (4 OCCUPANTS)
 - 1 FOOD/ STORAGE 10X10 (100 SF)
- TWO ADMIN/LAUNDRY IN-GROUND PREFABRICATED STRUCTURE (8X40)
- TWO HYGIENE TRAILERS (1:15 FOR TOILETS AND SHOWERS)
- TWO LAUNDRY FACILITIES
- 3 PARKING STALLS

KEYNOTE LEGEND

- A. (N) PERIMETER FENCING WITH PRIVACY SLATS, 8' HIGH,SLEEVE EXISTING POLES IS POSSIBLE, REMOVE EXISTING AS NECESSARY
- B. PALLET SHELTER 64, TO BE PLACED ON EXISTING ASPHALT
- C. HYGIENE TRAILER, SHOWERS, TOILETS, LAVATORIES, SEE SHEET A300
- D. NEW DOUBLE GATE
- E. GROUND TO BE PAINTED
- F. DUMPSTERS- CITY PROVIDED
- G. EXISTING FIRE HYDRANT
- H. (N) EGRESS GATE WITH PANIC HARDWARE
- I. (N) OUTDOOR SEATING WITH PICNIC TABLES-ULINE METAL PICNIC TABLES-6' RECTANGLE OR 46" ROUND AND MOBILE UMBRELLAS WITH ACRYLIC CANVAS SUNBRELLA FABRIC
- J. PROVIDE SITE AND EGRESS POST LIGHTS, TYP. AS NEEDED PER LIGHT STUDY
- K. HYGIENE UNIT STATION, REFER TO SHEET P001, GC TO VERIFY LOCATION
- L. HOT BOX AREA. POWER FROM ADJACENT CONTAINER.
- M. STORAGE PALLET 100
- N. FOOD DISTRIBUTION AREA
- O. FIRE LANE -ACCESS ROAD
- P. STAFF PARKING
- Q. 8x40 ADMIN AND LAUNRDY IN GROUND PRE- FABRICATED STRUCTURE, WITH LIGHTING, POWER, WATER AND SEWER CONNECTION AND AN EXTERIOR SINK WITH COVER, REFER TO SHEET A400. GC TO VERIFY REQUIREMENTS FOR SLAB DUE TO METHANE BUFFER AREA
- R. CONCRETE OR WOOD PLANTERS, NIC
- S. PET AREA IF REQUIRED.
- T. 6x6 GUARD BOOTH, GC TO VERIFY REQUIREMENTS FOR A SLAB.
- U. TICKET BOOTH, PROTECT IN PLACE
- V. NEW FIRE HYDRANT
- W. EXISTING FENCE- TO BE PROTECTED AT THE NORTH, MAKE OPENINGAS AS REQUIRED ALONG 'L' STREET

Item#	P/N	Material	Length	QTY
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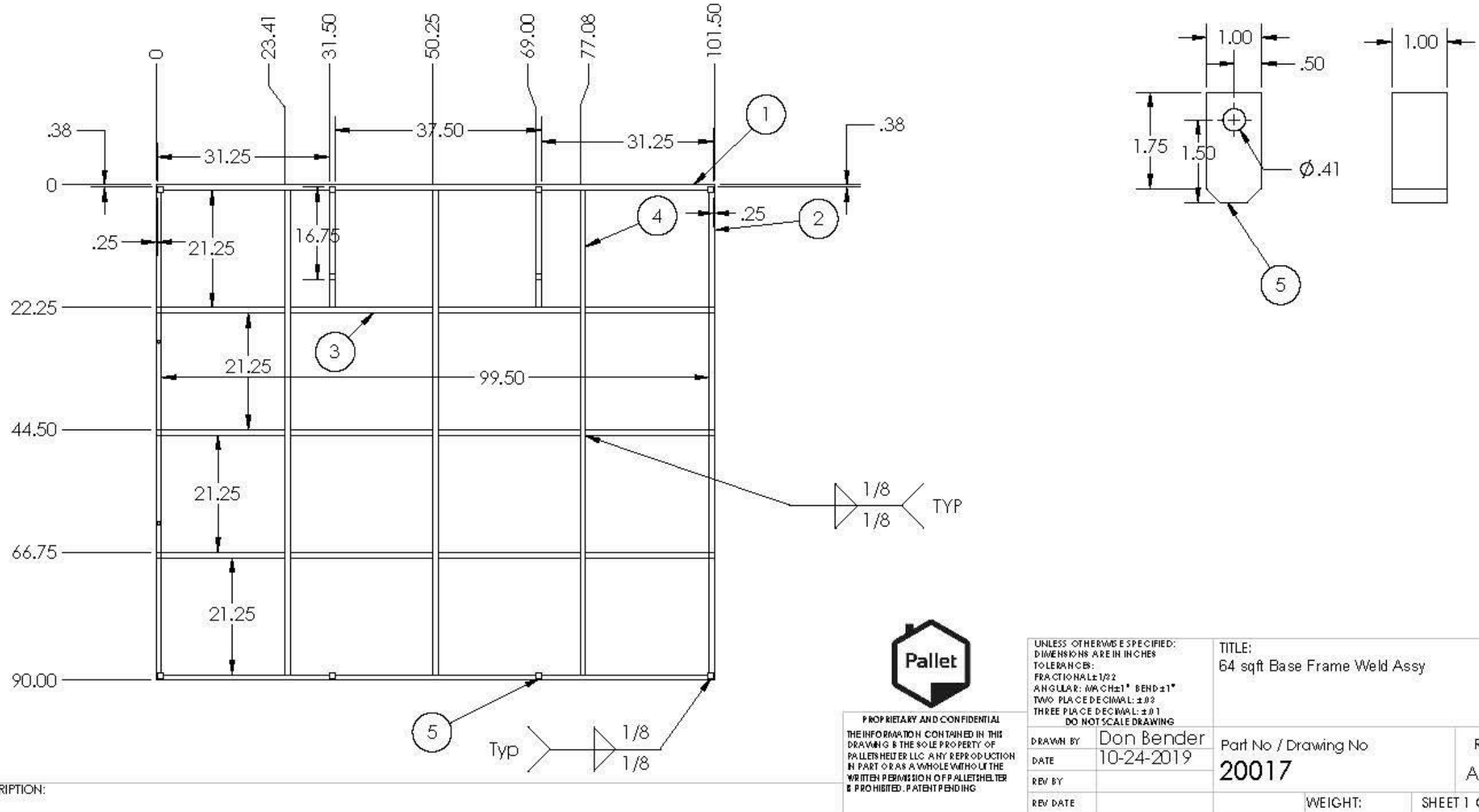
REVISIONS			
ZONE	REV.	DESCRIPTION	DATE
	A	Original Release	1/28/2020



Approved by Quality	Signature	Date
Approved by Production	Signature	Date
<small>UNLESS OTHERWISE SPECIFIED: DIMENSIONS ARE IN INCHES TOLERANCES: FRACTIONAL 1/16" ANGULAR 1/4" CHAMF. RND. 1/4" TWO PLACE DECIMALS, 3 SF THREE PLACE DECIMALS, 4 SF DO NOT SCALE DRAWING</small>		
<small>PROPRIETARY AND CONFIDENTIAL: INFORMATION CONTAINED IN THIS DRAWING IS THE SOLE PROPERTY OF PALMISTEC, LLC. ANY REPRODUCTION IN PART OR AS A WHOLE WITHOUT THE WRITTEN PERMISSION OF PALMISTEC IS PROHIBITED.</small>		
<small>DATE: 1/27/2020</small>		
<small>DRAWN BY: Don Bender</small>		
<small>Part Number 20010</small>		
<small>REV A</small>		
<small>WEIGHT: SHEET 1 OF 1</small>		

Item#	Part Number	Material	Length	QTY	Cut Type
1	10098	Rec Tube 1" x 2" x .065"	101.50"	2	45 degree miter
2	10099	Rec Tube 1" x 2" x .065"	90.00"	2	45 degree miter
3	10100	Rec Tube 1" x 2" x .065"	99.50"	3	SQ Cut
4	10101	Rec Tube 1" x 2" x .065"	21.25"	14	SQ Cut
5	10001	SQ Bar 1"	2.00"	10	SQ Cut

REVISIONS				
ZONE	REV.	DESCRIPTION	DATE	APPROVED
	A	Original Release	11/4/2019	

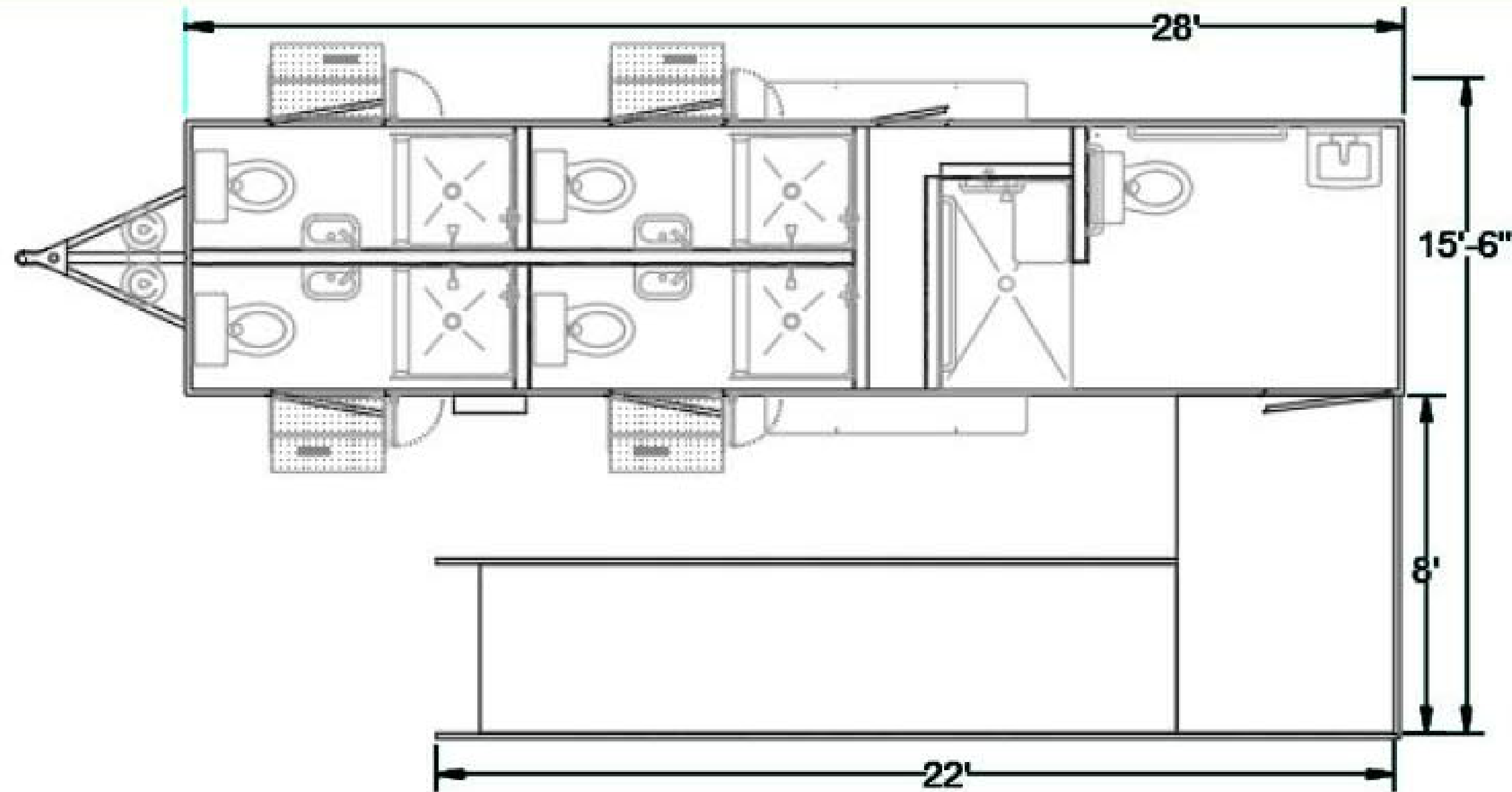


Approved by Quality	Signature	Date
Approved by Production	Signature	Date
<small>UNLESS OTHERWISE SPECIFIED: DIMENSIONS ARE IN INCHES TOLERANCES: FRACTIONAL 1/16" ANGULAR 1/4" CHAMF. RND. 1/4" TWO PLACE DECIMALS, 3 SF THREE PLACE DECIMALS, 4 SF DO NOT SCALE DRAWING</small>		
<small>PROPRIETARY AND CONFIDENTIAL: INFORMATION CONTAINED IN THIS DRAWING IS THE SOLE PROPERTY OF PALMISTEC, LLC. ANY REPRODUCTION IN PART OR AS A WHOLE WITHOUT THE WRITTEN PERMISSION OF PALMISTEC IS PROHIBITED. PATTENT PENDING</small>		
<small>DATE: 10-24-2019</small>		
<small>DRAWN BY: Don Bender</small>		
<small>Part No / Drawing No 20017</small>		
<small>REV A</small>		
<small>WEIGHT: SHEET 1 OF 1</small>		

2
A201
PALLET - PLAN VIEW
NOT TO SCALE

1
A201
PALLET- BASE ANCHORING
NOT TO SCALE





ACCESSORIES SCHEDULE

ITEM	MAT	BRAND	ITEM#
SHOWER HOOK	STAINLESS STL.	GLOBAL	T97B667481
TOWEL DISPENSER	STAINLESS STL.	GLOBAL	T97640902
TOILET PAPER DISPENSER	STAINLESS STL.	GLOBAL	T9AB489291
SOAP DISPENSER	STAINLESS STL	GLOBAL	T9A640905
SANITARY NAPKIN DISPOSAL	STAINLESS STL.	GLOBAL	T9AB710031
SURFACE MOUNTED SEAT COVER DISPENSER	STAINLESS STL	GLOBAL	T9AB489212

NOTE: GC TO INSTALL REQUIRED DOOR SIGNAGE FOR UNISEX STALLS

SPECIFICATIONS

- Lowest floor height with large waste tanks
- Rooftop air-conditioners, 13,500 BTU, with 5600 BTU heat strips included
- Porcelain RV style water-saving toilets, one pint per standard flush
- Timed faucets
- Mirrors
- Linoleum floors, single piece in each room protects the trailer from water damage
- Powder coated toilet partitions
- Urinal privacy screens
- Standard Fiberglass wall panels, attractive and easy to clean
- LED Interior lighting, interior and exterior
- Tank level visual sight level indicator for waste tanks
- White, Charcoal or Pewter aluminum exterior skin for a corrosive free look. Other exterior colors are available upon request (minimal charge applies)
- Thick aluminum skin (0.40) for increased durability.
- 7,000 lbs Independent Torsion Suspension axles and trailer rated radial tires help provide smoother, safer towing.
- E-Z Lube Hubs With steel wheels
- Modular-styled rims w/E-Coat prime and powder finish
- All-wheel brakes w/12 volt breakaway switch and battery
- D.O.T. premium LED superior trailer lights
- Warranty: 5 years on frame and axles, 1 year overall warranty, unless superseded by their manufacturers warranty.
- Water Fountain will be added to the end of the trailer, outside the accessible stall.

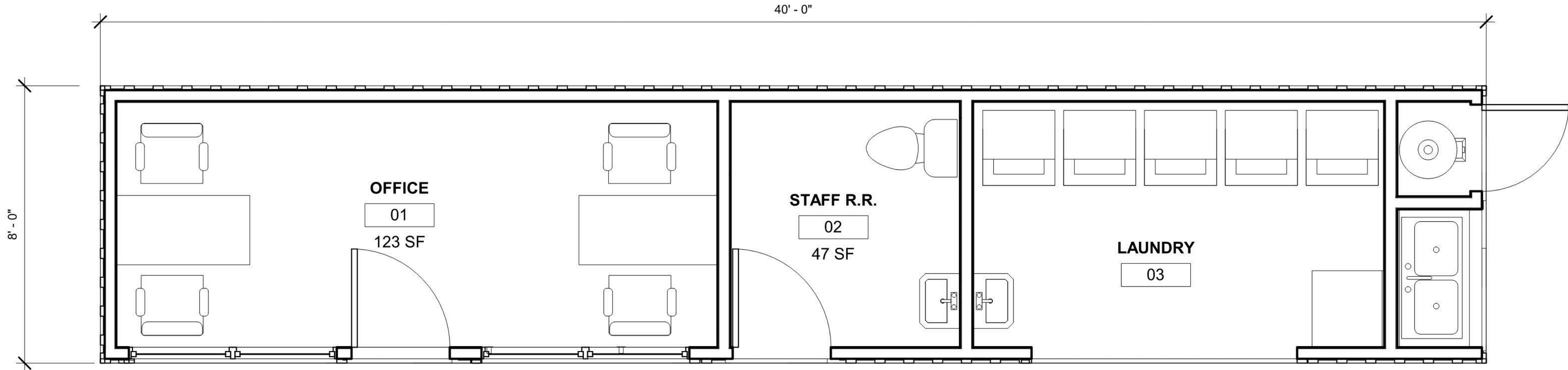
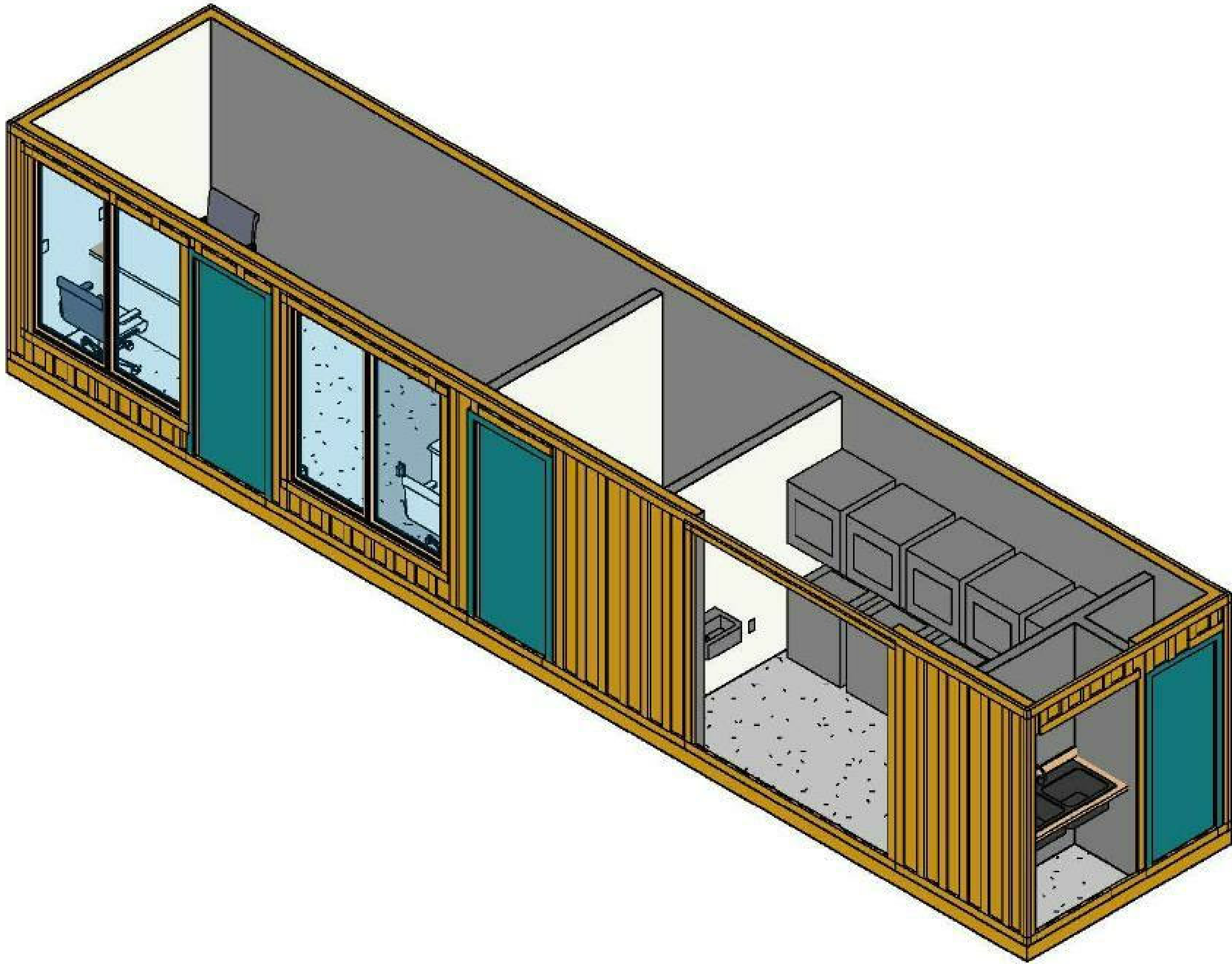
PROVIDED BY THE CITY

B.O.D. Architectural Guidelines

- 8' wide, 40' long, prefab, in-ground structure
- The structural building materials used in the modified containers shall be designed in accordance with the AISC 360 or AISI S100, and shall be in compliance with the CBC. The prefab structure installation shall be in accordance with the approved plans from LADBS.
- The structure shall consist of but not limited to the following fully pre-assembled architectural components:
 - Floor (Vinyl Planks over 5/8" T&G sheathing plywood)
 - 4" Rubber wall base
 - Interior wall (4" 18ga Cold-Formed Steel C-Studs, R-15 Kraft Faced Fiberglass Insulation Bat formaldehyde free, 5/8" GWB w/level 4 finish & 3 coats semi-gloss paint)
 - Vinyl (PVC) Horizontal Slider Windows (block frame, vinyl flashing around window)
 - Smooth Fiberglass Exterior Doors (ANSI Grade 2 Door Hardware)
 - Exterior paint (all visible steel) 3 coats
- All grades shall meet accessibility requirements of 2% max cross slope and 5% max slope in direction of travel.
- Floor drain with trap primer required in laundry and water heater room.

B.O.D. Mechanical Specifications

- Provide one (1) outdoor heat pump unit: SAMSUNG AR12TSFYBWKXCV (12,000 btu/h cooling; 12,000 btu/h heating) for Office.
- Provide one (1) wall mounted indoor units:SAMSUNG AR12TSFYBWKNCV for Office
- Provide Condensate pump: Blue Diamond BD-BLUE-230 for Office.
- Provide one(2) Panasonic Ventilation fan FV-0511VK2. Install one for Staff R.R.(12"X10" Door Louver required) and one for Laundry.
- Provide one (1) Bradford White ElectriFLEX HD commercial Electrical Water Heater: CEHD80(A)153*CF
- Provide one(1) THERM-X-TROL ST-12C-DD Thermal Expansion Tank.



Fire Alarm and Smoke Detection System

- A complete and working Fire Alarm and Smoke Detection System as required by the Los Angeles Fire Department.

FIXTURE LABEL	FIXTURE TYPE	MANUFACTURER	MODEL NUMBER	DESCRIPTION
WC-1H	LAVATORY (OFFICE)	AMERICAN STANDARD	DECLYN 0321.026	FAUCET: CHICAGO FAUCETS MODEL: 3400-E39VPABCP; PROVIDE 122-ABNF THERMOSTATIC MIXING VALVE
	WATER CLOSET (OFFICE)	AMERICAN STANDARD	MADERA FLOWISE 2854.128	1.28GPF, TOP SPUD 16-1/2" HEIGHT BOWL AND MANUAL FLUSH VALVE; ADA COMPLIANCE
	SERVICE SINK	ELKAY	14-2C16X20-0X	16"L X 20"W X 14"D DOUBLE COMPARTMENT; PROVIDE AMERICAN STANDARD EXPOSED YOKE WALL MOUNT UTILITY FAUCET 8354.112

CITY OF LOS ANGELES

GARY LEE MOORE, PE, ENV SP

A Bridge Home

DEPARTMENT OF PUBLIC WORKS

OFFICE/LAUNDRY

CD 15 TINY HOME VILLAGE

1221 FIGUEROA PLACE

BUREAU OF ENGINEERING

ENGINEERING

CITY OF LOS ANGELES

CITY ENGINEER

COUNCIL DISTRICT: 15

DATE: 8/31/20

DRAWN BY: Author

CHECKED BY: Checker

Scale: A400

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

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

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, MS 939, Los Angeles, CA 90015		COUNCIL DISTRICT 15	
PROJECT TITLE: CD 15 1221 Figueroa Pl. Pallet Shelter Project KEN MALLOY HARBOR REGIONAL PARK – PROPOSED CD15 TINY HOMES VILLAGE PROJECT		LOG REFERENCE C.F. 20-0841	
PROJECT LOCATION: 1221 Figueroa Pl., Harbor City, CA 91744. The project site is located at the Harbor Park Sports Complex parking lot in the Harbor City area of the Wilmington-Harbor City Community Plan Area in the City of Los Angeles Council District 15 (CD 15), Assessor's Parcel Number (APN) 7412-010-903, see <i>Figure 1 – Project Site Location</i> . T.G. 794-B5, B6, & C5			
DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT The proposed project consists of the construction of a new homeless shelter at a Recreation and Parks owned parcel that includes pallet shelters that are small, detached, pre-fabricated cabins assembled on site with beds for up to 150 individuals, two hygiene trailers with restrooms, showers, lavatories, drinking fountains; and designated seating areas for food services for people experiencing homelessness. The nature of this project is to serve the local homeless community within the vicinity of the project. The purpose of the project is to provide emergency shelter for individuals experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The project includes approximately 80 pallet shelters; 73 with double beds (146 occupants) and four with Americans with Disabilities Act (ADA) compliant single beds. There is also one 8'x20', 160-sf cargo container for administration; and three pallet shelters, one for food prep and two for storage, all with no beds. The Project Site is approximately 47,800-square feet (sf) and is currently developed as a City owned parking lot. The project includes beds in crisis and bridge housing for up to 150 people experiencing homelessness. Project beneficiaries include the homeless community, the public and local businesses. A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. (Please see the attached narrative for more details).			
On _____, the Board of Recreation and Park Commissioners determined this action was exempt from CEQA and approved the project			
CONTACT PERSON: Maria Martin		TELEPHONE NUMBER: 213-485-5753	
EXEMPT STATUS: (Check One)	<u>CITY CEQA</u> <u>GUIDELINES</u>	<u>STATE CEQA</u> <u>GUIDELINES</u>	<u>CA PUBLIC</u> <u>RESOURCE CODE</u>
<input checked="" type="checkbox"/> STATUTORY		15269(c)	21080(b)(4) & 21080.27
<input checked="" type="checkbox"/> Governor's Executive Order No. N-32-20 (March 18, 2020) suspending CEQA "for any project using Homeless Emergency Aid Program funds, Homeless Housing, Assistance, and Prevention Program funds, or funds appropriated in Senate Bill 89".			
JUSTIFICATION FOR PROJECT EXEMPTION: This project is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline Section 15269(c); Public Resources Code section 21080.27 (AB 1197) applicable to City of Los Angeles bridge homeless shelters; and, because the project uses "Homeless Emergency Aid Program funds," it is exempt under Governor's order N-32-20. (see attached narrative).			
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING			
SIGNATURE: Maria Martin		TITLE: Environmental Affairs Officer Environmental Management Group	
DATE:		DATE:	
FEE: \$75.00 _____	RECEIPT NO.	REC'D BY	DATE

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EXEMPTION NARRATIVE

The proposed project includes the construction of a new homeless shelter site (Project Site) that will provide emergency shelter, hygiene, storage, and food services to people experiencing homelessness. The Project Location is on an approximately 159-acre, irregularly shaped parcel that is currently owned and developed as the City of Los Angeles, Department of Recreation and Parks (RAP) Harbor Sports Complex (Sports Complex). The Project Site is on a southern 47,800-sf portion of the Harbor Sports Complex paved parking lot area. (City of Los Angeles Department of City Planning, 2020).

The Project Site is located in the Harbor City area of the Wilmington-Harbor City Community Plan Area in the City of Los Angeles Council District 15 (CD 15), 1221 N. Figueroa Pl., Harbor City, CA 91744, and Assessor's Parcel Number (APN) 7412-010-903, see *Figure 1 – Project Site Location*.

The project includes the construction of a new homeless shelter site at a RAP Harbor Sports Complex public parking lot that includes pallet shelters with beds for up to 150 individuals experiencing homelessness, in furtherance of providing emergency homeless shelter beds in the City of Los Angeles. Pallet shelters are small, detached, pre-fabricated cabins made of aluminum and composite materials that will be assembled on site. The project includes approximately 80 pallet shelters; 73 with double beds (146 occupants) and 4 with ADA single beds.

Additionally, there will be one cargo container for administration, two pallet shelters for storage and one pallet shelter for food prep, all with no beds. The shelter will be operated consistent with the Los Angeles Homeless Services Authority's (LAHSA) program requirements for bridge shelters including, but not limited to, LAHSA's Scope of Required Services and Program Standards (LAHSA, 2019-2020). A third-party service provider will operate the project for the City and it is anticipated that a lease or similar operating and/or funding agreements may be executed with the service provider, County, and/or LAHSA.

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

The project is zoned OS with an Open Space land use designation. It is located at the Harbor Sports Complex parking lot, which is a public institutional use, on the northwest corner of the intersection of L St. and Figueroa Pl., just south of Pacific Coast Highway and the I-110 Harbor Freeway intersection. As shown in Figure 1, below, parcels that bound the project location on the north are residential, commercial, and open space zoned, on the south and east are public facility zoned, and to the west is open space zoned. The parcel is an infill site that is bounded on the west by the city-owned municipal Harbor Park Golf Course, a public institutional use, on the south by Harbor College, a public community college that is also a public institutional use, on the east by the I-110 Harbor Freeway, a transit and transportation facility use, and across the freeway are located single-family residential properties, and the northern boundary of the greater parcel that includes the golf course abuts multi-family residential, commercial, and retail establishments that front on Pacific Coast Hwy. The project site is located within an urban area on a parcel that is currently developed as a parking lot for a publicly owned park and recreation complex and is considered a public institutional facility. (City of Los Angeles Department of City Planning, 2020).

Figure 1
Project Site Location Map



I. PROJECT HISTORY: HOMELESS SHELTER CRISIS AND EMERGENCY

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

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

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (LAFD Battalion Chief and Paramedic Douglas 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 ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

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

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

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

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

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

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

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater

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

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

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

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

B. Unexpected and Unabated Dramatic Surge in Homelessness

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

City of Los Angeles officials and contracted partners responsible for homelessness

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

(Mayor Eric Garcetti, 2020)

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

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

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

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

II. THE PROJECT IS EXEMPT FROM FURTHER CEQA REVIEW

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

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

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

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

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

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

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

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

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

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

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

1. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq.

on April 17, 2018 (The Honorable M. Bonin & M. O'Farrell , 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019)

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

Under AB1197, emergency shelters must meet the definition of “Low Barrier Navigational Center” in Government Code Section 65660, which defines Low Barrier Navigation Center as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing. The City builds these emergency shelters pursuant to its “A Bridge Home” program, and this Project is part of the A Bridge Home program.

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

Per LAHSA’s Bridge Housing Scope of Required Services (SRS), which will be followed for operating the shelter in this project, service providers that oversee an A Bridge Home shelter must provide case management services and develop a Housing Stability Plan with each person. The A Bridge Home program implements 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 in the Bridge Housing bed.

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 of the A Bridge Home stay. 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 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 A Bridge Home program 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 Bridge Housing due to any unnecessary barriers.

The City's A Bridge Home program is 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 shelters developed under the A Bridge Home program, including this emergency shelter project, 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 "A Bridge Home" 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 80 pallet shelters which allow for presence of partners. This project is pet friendly. Participants are allowed to bring their pets to the shelter and live with them inside their pallet shelter. There is no pet play area onsite. The project has storage within each room for personal possessions. The project is designed to provide privacy to participants by providing each individual or couple with their own room. Each site has a bathroom and private living quarters. Therefore, the project is managed and designed to allow the privacy of participants and is a pet friendly facility for participants who choose to be accompanied by their pets.

The project uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, storage areas for possessions, and management and design for individuals' privacy. All of the City's Bridge Home program 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 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 to permanent housing through a services plan that identifies services staffing. This project meets that requirement. As noted above, the project includes housing-focused case management sessions that involve developing Housing Stability Plans/Housing and Services Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed. This is required in LAHSA’s Scope of Required Services.

The Housing Stability Plan is the family’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 individual right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the person’s situation changes and steps are completed or revised accordingly.

Individuals are assisted with a range of activities that address the stated goals of the 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 individuals to permanent housing. This is required by LAHSA's Scope of Required Services and Program Standards. Thus, all City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's A Bridge Home program collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. A Bridge Home 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 A Bridge Home program collaborates with Los Angeles County Case Entry system Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

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

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

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

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

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

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

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

The site is located in an urban area on an infill site that has been previously developed as a surface parking facility for a public city park and city sports complex that are part of the greater Ken Malloy Harbor Regional Park and Recreation Area. The project is zoned OS with an Open Space land use designation. It is located on the Harbor Sports Complex's parking lot on the northwest corner of the intersection of L St. and Figueroa Pl., just south of Pacific Coast Highway and the I-110 Harbor Freeway intersection. It is on a southern portion of a greater parcel that is occupied by the Harbor Sports Complex and the Harbor Park Golf Course, a city-owned municipal golf course; both of which are public institutional uses, and thus the parcel's prior use has been as a public institutional use.

The Harbor Sports Complex and Harbor Park Golf Course are immediately north of the project site within the greater parcel on which the project is located. Immediately to the west of the project site within the greater parcel are located similar public institutional parking areas and the Harbor Park Golf Course. the greater parcel on which the project is located , which includes the sports complex and golf course, is bounded on the north are residential, commercial, and open space zoned, on the south and east are public facility zoned, and to the west is open space zoned. Immediately south of the project site is located Harbor College, a public institutional use. On the east running in a north-south direction adjacent to Figueroa Place, is the I-110 Harbor Freeway, a transit and transportation facility use, and a neighborhood of residential properties is located immediately across the freeway from the project site, The northern boundary of the greater parcel on which the project site sits, which includes the sports complex and golf course abuts multi-family residential, commercial, and retail establishments that front on Pacific Coast Hwy. The project site is located within an urban area on a parcel that is currently developed as a parking facility for a publicly owned park, sports complex, and golf course and is considered a qualified public

institutional use. (City of Los Angeles Department of City Planning, 2020). Therefore, the Project site is surrounded by urban uses and is considered a qualified location under AB 1197.

5. The Project Involves Qualified Funding Under AB 1197

AB 1197 (Public Resources Code Section 21080.27(a)(2)(A)-(D) exempt emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. The project is funded, at least in part, through the State of California Homeless Emergency Aid Program funds grant. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement is met.

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

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

7. AB 1197 Conclusion

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

III. Bibliography

- Hibbs, Jonathan R., MD, et. al. (1994). Mortality in a Cohort of Homeless Adults in Philadelphia. *New England Journal of Medicine*.
- Baggett, Travis P et al. (2015, July 3). *Disparities in Cancer Incidence, Stage, and Mortality at Boston Health Care for the Homeless Program*. Retrieved from PubMed Central (PMC) U.S. National Institutes of Health's National Library of Medicine: <https://www.ncbi.nlm.nih.gov/pubmed/26143955>
- Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, . (2010). The Unmet Health Care Needs of Homeless Adults: A National Study. *American Journal of Public Health*, Vol 100, No. 7.
- Barrow ,Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD. (1999). Mortality Among Homeless Shelter Residents in New York City. *American Journal of Public Health*, Vol. 89, No. 5.
- California Dept. of Public Health. (2020, March 16). *COVID-19 Public Health Guidance, Self Isolation for Older Adults and Those Who Have Elevated Risk*. Retrieved from California Dept. of Public Health: https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/Self_Isolation_Guidance_03.16.20.pdf
- Choi, C. D. (2019, March 23). Declaration of Los Angeles Police Department Commander Dominic H. Choi, Pg 6. Los Angeles, CA, USA: Los Angeles Police Department.
- City of Los Angeles Department of City Planning. (2020, 4 17). ZIMAS. Retrieved from ZIMAS: <http://zimas.ci.la.ca.us/>
- Commander Dominic H. Choi. (2019, March 23). Declaration of Los Angeles Police Department. *Declaration of Los Angeles Police Department* , Pg 6. Los Angeles, CA, USA: City of Los Angeles.
- Corey Egel. (2020, March 11). *State Health & Emergency Officials Release Guidance to Prepare and Protect Homeless Californians and Service Providers from COVID-19 No. NR20-018*,. Retrieved from California Dept. of Public Health: <https://www.cdph.ca.gov/Programs/OPA/Pages/NR20-018.aspx>
- County of Los Angeles Public Health Department. (2020, April 10). *Order for Control of COVID-19*. Retrieved from County of Los Angeles Public Health Department: http://publichealth.lacounty.gov/media/Coronavirus/docs/HOO/HOO_Safer_at_Home_Order_for_Control_of_COVID_04102020.pdf.
- Department of Public Health. (2019, October). *Recent Trends in Mortality Rates and Causes of Death Among People Experiencing Homelessness in Los Angeles County*. Retrieved from County of Los Angeles, Department of Public Health, Center of Health Impact Evaluation: http://publichealth.lacounty.gov/chie/reports/HomelessMortality_CHIEBrief_Final.pdf
- Governor Gavin Newsom. (2020, March 4). *California Executive Department, Governor's Proclamation of a State of Emergency* . Retrieved from Office of the Governor. State of California: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.4.20-Coronavirus-SOE-Proclamation.pdf>
- Governor Gavin Newsom. (2020, March 12). *Executive Order N-25-20* . Retrieved from California Office of the Governor: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.12.20-EO-N-25-20-COVID-19.pdf>
- Governor Gavin Newsom. (2020, March 18). *Executive Order N-32-20*. Retrieved from California Office of the Governor: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.19.20-attested-EO-N-33-20-COVID-19-HEALTH-ORDER.pdf>
- Governor Gavin Newsom. (2020, March 19). *Executive Order N-33-20* . Retrieved from California Office of the Governor: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.19.20-attested-EO-N-33-20-COVID-19-HEALTH-ORDER.pdf>

- Governor Gavin Newsom. (2020, March 18). *Governor Newsom Takes Emergency Actions & Authorizes \$150 Million in Funding to Protect Homeless Californians from COVID-19*. Retrieved from California Office of the Governor, Press Release : <https://www.gov.ca.gov/2020/03/18/governor-newsom-takes-emergency-actions-authorizes-150-million-in-funding-to-protect-homeless-californians-from-covid-19/>
- Governor's Office of Planning and Research. (2018, December 28). *California Environmental Quality Act Guidelines*. Retrieved from Governor's Office of Planning and Research: <https://www.opr.ca.gov/ceqa/updates/guidelines/>
- Hunter, S. B. (2017). *Evaluation of Housing for Health Permanent Supportive Housing Program*, p. 2; Hwang SW,. Retrieved from RAND Corporation: https://www.rand.org/pubs/research_reports/RR1694.html
- Hunter, Sarah B., Melody Harvey, Brian Briscoombe, and Matthew Cefalu. (2017). *Evaluation of Housing for Health Permanent Supportive Housing Program*. Retrieved from RAND Corporation: https://www.rand.org/pubs/research_reports/RR1694.html
- Hwang SW, C. C. (2013). A Comprehensive Assessment of Health Care Utilization Among Homeless Adults Under a System of Universal Health Insurance. *American Journal of Public Health*, 103.
- LAFD Battalion Chief and Paramedic Douglas Zabalski. (2019, March 26). *Declaration of Los Angeles Fire Department, paragraph 8*. Los Angeles: City of Los Angeles.
- LAHSA. (2019). *Greater Los Angeles Homeless Count – Data Summary*. Los Angeles: Los Angeles Homeless Services Authority.
- LAHSA. (2019-2020). *Bridge Housing Program Scope of Required Services, Program Standards, and CES for Families Principles and Practices*. Los Angeles: LAHSA. Retrieved from <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- LAHSA. (2019-2020). *Bridge Housing Program Scope of Required Services, Program Standards, and CES for Families Principles and Practices*. Los Angeles: LAHSA. Retrieved from <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- LAHSA. (2020, June). *Greater Los Angeles Homeless Count – Data Summary 2020*. Los Angeles: Los Angeles Homeless Services Authority.
- LAHSA. (2020). *Greater Los Angeles Homeless Count – Revised Data Summary 2019*. Los Angeles: Los Angeles Homeless Services Authority.
- LAHSA. (2020). *Revised 2019 Greater Los Angeles Homeless Count – Data Summary*. Los Angeles: Los Angeles Homeless Services Authority.
- Los Angeles Homeless Services Authority. (2018, July 23). *Greater Los Angeles Homeless Count – Data Summary*. *Greater Los Angeles Homeless Count – Data Summary*. Los Angeles, CA, USA.
- Mayor Eric Garcetti. (2020, March 4). *Mayor's Declaration of Local Emergency*. Retrieved from City of Los Angeles: http://clkrep.lacity.org/online/docs/2020/20-0291_reso_03-04-2020.pdf
- Mayor Eric Garcetti. (2020, April 10). *Mayor's Safer at Home Order*. Retrieved from City of Los Angeles: <https://www.lamayor.org/sites/g/files/wph446/f/page/file/SaferAtHomeAPR10.pdf>
- Morrison, D. S. (2009). Homelessness as an Independent Risk Factor for Mortality: Results from a Retrospective Cohort Study. *International Journal of Epidemiology*.
- Salit, S. A. (1988). Hospitalization Costs Associated with Homelessness in New York City. *New England Journal of Medicine*.
- Salit, S. A. (1998). Hospitalization Costs Associated with Homelessness in New York City. *New England Journal of Medicine*.
- Santiago. (2019, September 26). AB1197. *California Environmental Quality Act: exemption: City of Los Angeles: supportive housing and emergency shelters*. Sacramento, CA, USA: California State Assembly.
- Schwarcz, Sandra K, Ling C Hsu,, Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell

H Katz. (2009, July 7). *Impact of Housing on the Survival of Persons with AIDS*. Retrieved from Bio Medical Central Public Health: <http://www.biomedcentral.com/1471-2458/9/220>

State of California. (2012). Public Resources Code Secion 21080.27(a)(2).

Supervisor Ridley-Thomas, Supervisor Solis. (2019, October 29). *Assessing the Health Care Needs of People Experiencing Homelessness to Address Rising Mortality Rates*.. Retrieved from County of Los Angeles, Board of Supervisors: <http://file.lacounty.gov/SDSInter/bos/supdocs/141362.pdf>

The Honorable M. Bonin & M. O'Farrell . (2019, 1 21). The City Safe Parking Program. *Council File No. 15-1138-S33*. Los Angeles, CA, USA: City of Los Angeles City Council.

The Honorable Judge David O. Carter. (2020, May 22). Preliminary Injunction Order issued in LA Alliance for Human Rights v. City of Los Angeles, Case No. LA CV 20-02291-DOC-KES. UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA. Retrieved from Preliminary Injunction Order issued in LA Alliance for Human Rights v. City of Los Angeles, Case No. LA CV 20-02291-DOC-KES (C.D. Cal May 22, 2020).

The Honorable M. Bonin & M. Harris-Dawson. (2019, 10 21). Declaration of Shelter Crisis. *Council File No. 15-1138-S40*. Los Angeles, CA, USA: City of Los Angeles City Council.

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

Attachment

Project Site Plan

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: 



KAREN BASS
MAYOR

DECLARATION OF LOCAL HOUSING AND HOMELESSNESS EMERGENCY

WHEREAS, Section 231(i) of the Los Angeles City Charter and Section 8.33 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 due to the existence of a critical shortage of local affordable housing and/or an emergency on homelessness; and

WHEREAS, on December 12, 2022, I declared the existence of a local emergency on homelessness with a sunset of six months subject to renewal. The City Council renewed the declaration of emergency and established a new sunset date of July 9, 2023; and

WHEREAS, although significant progress has been made since I declared the homelessness emergency in December of last year, the City still faces a critical shortage of local affordable housing, and the number of individuals unhoused and unsheltered remain far too high; and

WHEREAS, the City still finds itself in an emergency because most if not all of the concerns articulated in the recitals in my December declaration are true today; and

WHEREAS, the unhoused population in the City is greater than two times the total number of interim beds, as established in the annual Homeless Inventory Count submitted to the federal Department of Housing and Urban Development. This alone is sufficient to authorize my declaration of this local housing and homelessness emergency under Section 8.33 of the Los Angeles Administrative Code; and

WHEREAS, the City's housing supply is projected to be at least 40 percent below its annual housing production goals as established in the Housing Element approved by the State Department of Housing and Community Development and reported in the City Planning Department's quarterly Housing Production Report. This is yet another independent basis for me to declare this local housing and homelessness emergency under Section 8.33 of the Los Angeles Administrative Code; and

WHEREAS, declaring this emergency will enable the City to continue to mobilize local resources, coordinate inter-agency response, accelerate procurement of housing units, use mutual aid, and seek assistance and potential reimbursement by the State and

Federal governments - all critical to the ongoing efforts to respond forcefully and successfully to this housing and homelessness crisis; and

WHEREAS, because current conditions remain consistent with those in existence during the pendency of the local emergency I declared in December of last year, the Los Angeles City Council retains its full authority to consider a variety of City ordinances to codify the measures necessary to address this homelessness crisis; and

WHEREAS, although the City 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, this emergency declaration is necessary to continue to mobilize resources, save lives, and provide for the public health, welfare, and safety of all;

NOW, THEREFORE, I hereby declare the existence of a local emergency on affordable housing and homelessness and direct all City Departments to take necessary steps for the protection of life, health and safety in the City of Los Angeles. The Executive Directives issued by me in response to the original declaration of emergency and its renewal shall remain in full force and effect through the pendency of this declaration.

I DIRECT that, as authorized under Section 8.33 of the Los Angeles Administrative Code, I shall coordinate citywide planning and respond with respect to unsheltered or unhoused individuals in conjunction with the City Administrative Office, Los Angeles Homeless Services Authority, Los Angeles City Housing Department, Los Angeles City Planning Department, and all other necessary departments and agencies. I shall also coordinate the City's 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 all relevant City departments and agencies continue to cooperate by compiling and delivering 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 with respect to a critical shortage of local affordable housing and the homelessness crisis, and that notice shall be given of this Declaration through the most feasible means.



KAREN BASS
Mayor

Dated at Los Angeles, California

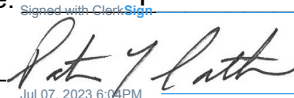

Date: July 7th, 2023

Time: 5:14 p.m.

Filed with the City Clerk

Date: July 7, 2023

Time: 6:04 pm

By:  

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE


0220-05151-0540

Date: March 12, 2024

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

 Digitally signed by
Edwin Gipson II
Date: 2024.03.12
09:25:50 -07'00'

Subject: **REQUEST TO EXTEND A TINY HOME VILLAGE AT 1221 N. FIGUEROA PLACE (AKA HARBOR PARK) IN COUNCIL DISTRICT 15**

On June 18, 2020, the City and the County of Los Angeles entered into an agreement that became the basis of the COVID-19 Homelessness Roadmap. On May 5, 2021, the Council and Mayor approved the site owned by the Department of Recreation and Parks (RAP) located at 1221 N. Figueroa Place in Council District 15 for a Tiny Home Village that would provide shelter and services to people experiencing homelessness (PEH).

On December 12, 2022, the Mayor declared a local emergency (C.F. 22-1545) to address the City of Los Angeles's homelessness crisis for the protection of life, health, and safety in the City, where at any given time there are approximately 41,980 PEH. This site helps to address the local emergency by providing interim housing and services to PEH. Therefore, 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:

1221 N. Figueroa Pl., aka Harbor Park
Service Provider: The Salvation Army
Bed Count: 75
Structure Type: Tiny Home Village
Current Expiration Date: June 22, 2024
Extension Request: 1 year


Thank you for your assistance with this matter. If you have any questions about this request, please contact Annabelle Gonzales, Senior Administrative Analyst I, at annabelle.gonzales@lacity.org, or Michael Zambrano, Administrative Analyst, at michael.zambrano@lacity.org.

cc: Meghan Luera, Senior Management Analyst II, RAP

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

0220-05151-0657

Date: April 29, 2025

To: Jimmy Kim, General Manager
Department of Recreation and ParksAttn: Darryl Ford, Superintendent of Planning and Construction
Department of Recreation and ParksFrom: Edwin Gipson II, Assistant City Administrative Officer
Office of the City Administrative Officer

Digitally signed by Edwin
Gipson II
Date: 2025.04.28 18:07:48
-07'00'

Subject: **REQUEST TO EXTEND A TINY HOME VILLAGE AT 1221 N. FIGUEROA PLACE (AKA HARBOR PARK) IN COUNCIL DISTRICT 15**

On June 18, 2020, the City and the County of Los Angeles entered into an agreement that became the basis of the COVID-19 Homelessness Roadmap. On September 18, 2020 (C.F. 20-0841), the Council and Mayor approved the site owned by the Department of Recreation and Parks (RAP) located at 1221 N. Figueroa Place in Council District 15 for a Tiny Home Village which provides 75 beds to the City's Roadmap agreement.

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 45,252 based on the 2024 Point-in-Time Count. In an effort to support the local emergency, the Office of the City Administrative Officer, at the direction of Council District 15, 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:

1221 N. Figueroa Pl., aka Harbor Park
Service Provider: The Salvation Army
Bed Count: 75
Structure Type: Tiny Home Village
Current Expiration Date: June 22, 2025
Extension Request: 1 year

Thank you for your assistance with this matter. If you have any questions about this request, please contact Michael Zambrano, Administrative Analyst, at michael.zambrano@lacity.org, or Kendra Leal, Chief Administrative Analyst, at kendra.leal@lacity.org.

cc: Meghan Luera, Senior Management Analyst II, RAP