2019120369

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk
County of: Los Angeles

From: (Public Agency): City of Los Angeles
C/O Bureau of Engineering
1149 N Broadway Ave Ste 600 LA,, CA 90015
(Address)

Project Title: CD 13 1215 Lodi Place Bridge Housing Facility

Project Applicant: City of Los Angeles

Project Location - Specific:
1215 N. Lodi Place, Los Angeles, CA

Project Location - City: Los Angeles Project Location - County: Los Angeles

Description of Nature, Purpose and Beneficiaries of Project:

See Attached

Name of Public Agency Approving Project: City of Los Angeles

Name of Person or Agency Carrying Out Project: City of Los Angeles

Exempt Status: **(check one):**

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☐ Categorical Exemption. State type and section number: _____
- ☒ Statutory Exemptions. State code number: 21080.27 & 21080(b)(4)

Reasons why project is exempt:

This project is statutorily exempt under PRC Sections 21080.27 & 21080(b)(4).

Lead Agency Contact Person: Maria Martin Area Code/Telephone/Extension: (213) 485-5753

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? ☐ Yes ☐ No

Signature: M E Martin Date: 12/13/19 Title: EAO

☒ Signed by Lead Agency ☐ Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: 12/13/19

Governor's Office of Planning & Research

DEC 13 2019

STATE CLEARINGHOUSE

Revised 2011

COUNTY CLERK'S USE

ORIGINAL FILED

DEC 13 2019

LOS ANGELES, COUNTY CLERK

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(Articles II and III – City CEQA Guidelines)

CITY CLERK'S USE

DOCUMENT FILED
City Clerk's Office
No: ENV-2019-3241-BE
Certified by
Date: 12-13-19

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:	**COUNCIL DISTRICT**
City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, MS 939, Los Angeles, CA 90015	13
PROJECT TITLE: CD 13 1215 Lodi Place Bridge Housing Facility	**LOG REFERENCE** C.F. Nos. 19-0877 & 19-0877-S1

PROJECT LOCATION: 1215 N. Lodi Place, Los Angeles, CA T.G. 593 F5

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The project site is the historic Hollywood Studio Club property owned by the Young Women's Christian Association (YWCA). The project consists of a new lease agreement between the City of Los Angeles (the City) and the YWCA, minor alterations to accommodate approximately 60 additional beds (in addition to 64 existing beds) and to make the first floor Americans with Disabilities Act (ADA) compliant, and operation of a temporary homeless shelter, with approximately 124 beds total, that will provide emergency shelter, hygiene, storage, food services and case management to individuals experiencing homelessness. The nature of this project is to serve the local homeless community within the vicinity of the project. The purpose of the project is to provide emergency shelter for the homeless to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The project site is located in the Hollywood Community Plan Area in the City of Los Angeles, Council District 13 (CD 13), 1215 N. Lodi Place, Assessor Parcel Number (APN) 5534-003-017, see *Figure 1 – Project Site Location and Figure 2 – Assessor Parcel Map*.

The project site is developed with a three-story building which is partly occupied by a YWCA job training program and print center and a bridge housing site that currently includes 64 beds. Parking is available on site. The City will lease approximately 31,400 square feet (sf) of the building for approximately three years. The lease will include a sub-lease with a service provider, possibly the current service provider People Assisting the Homeless (PATH). Project beneficiaries include the homeless community, the public and local businesses. Standard conditions, including a construction management plan incorporated into the project design, will apply. Project beneficiaries include the homeless community, the public and local businesses. (Please see the attached narrative for more details).

On December 11, 2019, the City Council determined this action was exempt from CEQA and approved the project.

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

EXEMPT STATUS: (Check One)

	CITY CEQA GUIDELINES	STATE CEQA GUIDELINES	CA PUBLIC RESOURCE CODE
☒ STATUTORY		15269(c)	21080.27 & 21080(b)(4)

JUSTIFICATION FOR PROJECT EXEMPTION: This project is statutorily exempt under Public Resources Code Sections 21080.27 for City of Los Angeles bridge homeless shelters, and 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in State CEQA Guideline Section 15269(c) (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE:	TITLE:	DATE:
ME Martin Maria Martin	Environmental Affairs Officer Environmental Management Group	12/12/19

FEE: $75.00	RECEIPT NO.	REC'D BY	DATE

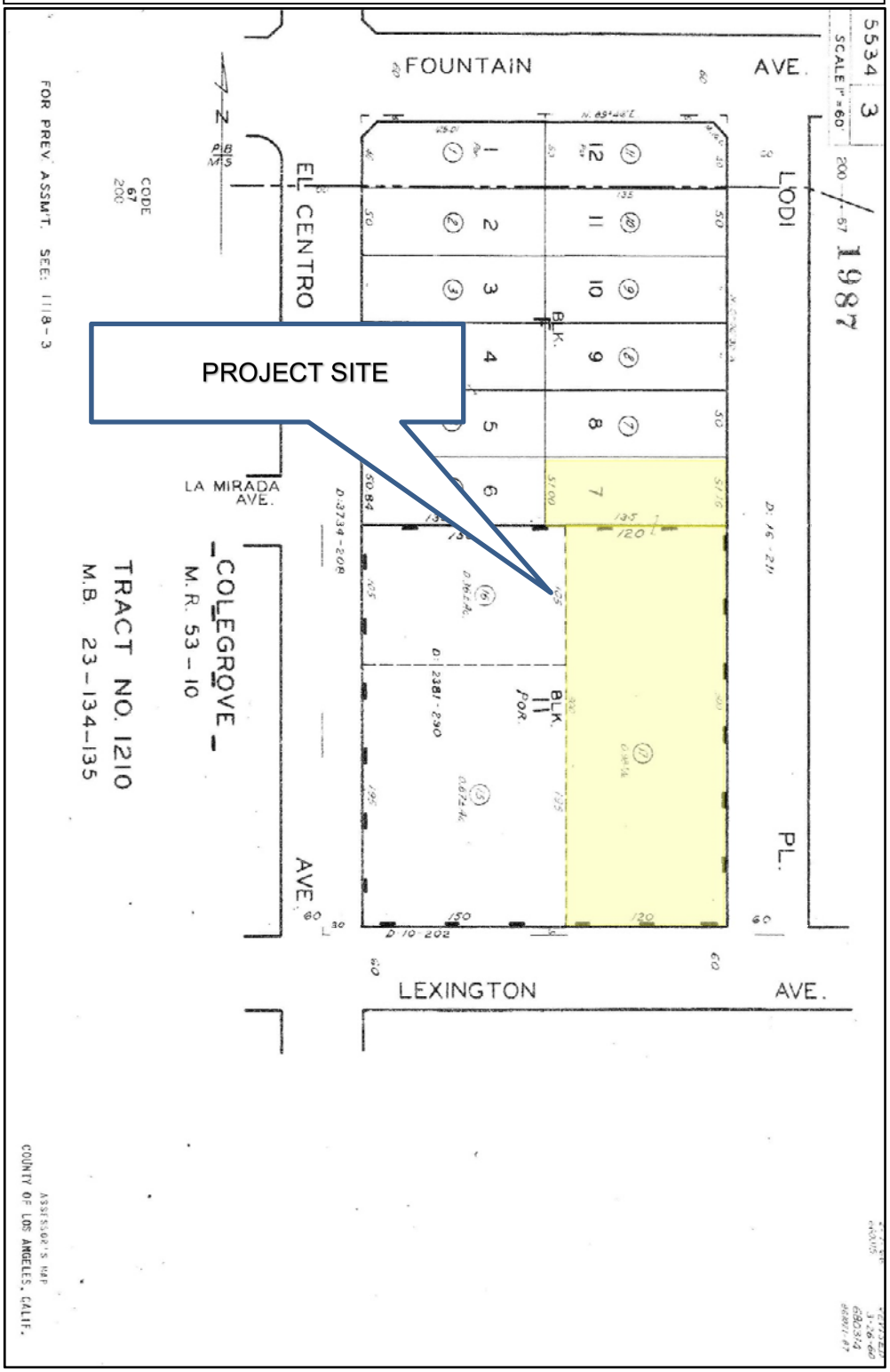
DISTRIBUTION: (1) County Clerk (2) City Clerk (3) Agency Record

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Figure 1: Project Site Location



FIGURE 2: ASSESSOR PARCEL MAP



EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The project site is zoned RD1.5-1XL with a Low Medium II Residential land use. The site is located northwest of the intersection of Lodi Place and Lexington Avenue. The site is developed with a historic three-story building known as the YWCA Hollywood Studio Club (or Hollywood Studio Club), a landscaped courtyard, and surface parking lot with fencing, security lighting, and landscaping. A basketball pole and hoop and some bleachers are located within on the parking lot. A bridge housing site with 64 beds has been operating at this site since November 2018.

Parcels that surround the site on the north, south, and west are zoned for Low Medium II Residential land uses. Parcels to the east are zoned for Medium Residential uses. The project site is located within a rectangular shaped parcel with an area of approximately 0.98 acres. The project site is in a Transit Priority Area and is generally bounded by Lexington Avenue to the south, Lodi Place to the east, and multiple family residences to the north and west. Lexington Avenue and Lodi place are designated local streets in the City of Los Angeles Mobility Plan (2035).

The closest transit stop is to the east of the project site is located on Lexington Avenue and Gower Street is for the Hollywood/Wilshire DASH which provides access to and from Hollywood Boulevard and Wilshire Boulevard. Regional transit access to and from the site to Santa Monica and Downtown Los Angeles is via METRO buses (Lines 4 and 704) at Santa Monica Boulevard and from the Hollywood/Vine Station to South Bay via METRO bus (Line 210). The project is consistent with the Los Angeles Municipal Code and the City of Los Angeles General Plan (General Plan) and will not significantly impact environmental resources.

A portion of the fist floor and the second and third floors will be leased by the City of Los Angeles and operated as a temporary bridge home by a City vendor, potentially People Assisting the Homeless. The project includes approximately 60 new beds, approximately 30 for transition age youth (TAY) (18 to 24 years old) and 30 for adult women. Full staff will be onsite during daytime operational hours to provide services. The site will be continuously staffed, 24 hours a day, with security personnel, and provided with security directional lighting.

Standard conditions, including a construction management plan incorporated into the project design, will apply. The project includes minor tenant and ADA compliance, limited to the first floor, improvements and will not significantly impact environmental resources.

Unless otherwise stated, the proposed project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards including but not limited to:

- Los Angeles Municipal Code
- Bureau of Engineering Standard Plans
- Standard Specifications for Public Works Construction
- Work Area Traffic Control Handbook
- Additions and Amendments to the Standard Specifications for Public Works Construction

The project will be operated pursuant to standard conditions for emergency shelters in the City's A Bridge Home program, which requires that the contracts for operating the project with service providers comply with Los Angeles Homeless Services Authority (LAHSA's) shelter program requirements, such as LAHSA's Bridge Housing Program Scope of Required Services and

LAHSA's Program Standards. These requirements include all of the requirements in Government Code sections 65660 and 65662 for being a Low Barrier Navigation Center. These operational requirements are discussed in more detail in the following sections of this document.

II. PROJECT HISTORY

The Hollywood Studio Club was designed by Architect Julia Morgan in a Mediterranean style and was built in 1925. The site was designated City of Los Angeles Historic Cultural Monument (HCM) LA-175 in 1977 and added to the National Register of Historic Places November 25, 1980.

The presence of the unsheltered homeless population and their homeless encampments has increased over the prior year by 16% in the City of Los Angeles. As shown on *Table 3 - 2019 Homeless Count Data Summary,* Total Homeless Persons increased 19% in the same period and Sheltered Homeless increased 5%. Some areas of the city have seen negative effects to access of public places, access routes; and businesses have been hindered. There are a growing number of support services to help the homeless find their way off the streets, however, more shelter and services are needed.

The August 2, 2019 homeless data prepared by LAHSA for the Hollywood Community, see Table 1, 2019 Homeless Population Count – Hollywood, documents a significant homeless population increase presenting a danger to health, life, public safety and undue burden on essential public services as detailed further below.

Table 1
2019 Homeless Population Count - Hollywood

Homeless Population	Sheltered	Unsheltered	Total	Percent Change 2018-19
All Persons	252	2,815	3,067	+82%
Female	89	662	751	+68%

This Bridge Home homeless shelter project is designed to mitigate the impacts caused by the spike in homelessness. The 2019 increase in City homelessness was both sudden and unexpected. Prior to June 2019, homelessness had been decreasing following County and City efforts, showing that the June 2019 dramatic increase in homeless persons was both unexpected and sudden.

The dramatic increase in homelessness identified in June 2019 and the attendant significant adverse public health, safety, and welfare impacts that are associated with homelessness will be exacerbated if these homeless shelter projects are delayed. Homeless populations themselves suffer from adverse health impacts greater than the non-homeless population, including greater risk of death. Homeless individuals impose outsized impacts upon and use public safety and public health resources compared to the general population. The dramatic increase of the already large Los Angeles-area homeless population shows that this situation meets the definition of an emergency because it presents a clear and imminent danger that demands immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services. This Bridge Home project is needed to mitigate the unexpected and dramatic surge in homelessness in the City of Los Angeles.

III. THE PROJECT IS EXEMPT FROM CEQA BASED ON A STATUTORY EXEMPTION IN PUBLIC RESOURCES CODE SECTION 21080.27 APPLICABLE TO BRIDGE HOMELESS EMERGENCY SHELTER PROJECTS LOCATED IN THE CITY OF LOS ANGELES

Assembly Bill 1197 (AB 1197) 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 (Pub. Resources Code, section 21080.27).

A. 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 (the City) City Council has declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (Council File No. 15-1138-S33), which is currently in effect (Council File No. 15-1138-S40 [June 14, 2019]).

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

AB 1197 is an urgency statute that is necessary for the immediate preservation of public peace, health and safety that addresses the unique circumstances faced by the City of Los Angeles and allows for the expeditious development of emergency shelters. The intent of AB 1197 is to help the City address its homeless crisis by developing emergency shelters pursuant to the crisis declaration. The City builds these emergency shelters pursuant to its “A Bridge Home” program.

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.”

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 individuals experiencing homelessness to income, public benefits, health services, shelter and housing.” This project provides temporary housing through the development and operation of a shelter, with case managers staffing the facility that provide connections to these homeless 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 participants and providers, and helps participants 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 Services

create a culture of nonviolence, learning, and collaboration.

The A Bridge Home program shelters are operated by service providers coordinated with LAHSA. The intention of this emergency A Bridge Home project is to provide participants 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 2018-2019 Bridge Housing Scope of Required Services (SRS), service providers that oversee an A Bridge Home shelter must provide case management services and develop a Housing Stability Plan with each participant. 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 participant 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 participants through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect participants 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 participants to a Housing Navigator who assists participants 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 a participant when the participant enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists participants with Housing Navigation services. Housing Navigation services are available to participants 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 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 participants 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 participants 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 2018-2019 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 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.

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 homeless people 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. For time-limited, supportive services programs serving homeless youth, programs should use a positive youth development model and be culturally competent to serve unaccompanied youth under 25 years of age. Providers should work with the youth to engage in family reunification efforts, where appropriate and when in the best interest of the youth. 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.

Although time-limited rental and supportive services programs may not be applicable to the City's shelters, the overall continuum of care addressing those aspects of Housing First use family reunification and positive youth development among the strategies to address the unique needs of unaccompanied homeless youth. Regardless, the shelters provide a strengths-based approach through LAHSA's scope of required services, which complies with the positive youth development model by assisting participants to identify their own strengths, develop coping skills, and build resiliency. The shelters, including this project, also provide initial efforts as required by LAHSA's Scope of Required Services for family reunification by requiring that the first conversation upon entry should be to assess for the possibility of diversion so as to assist the person self-resolve their housing and/or make reasonable efforts to re-connect with supportive family and/or friends who could temporarily or permanently house the participant, rather than reside in the Bridge Housing. If resources are needed to successfully divert a person 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 participant 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 participants to exit to safe and stable housing. Thus, the goals in the Housing First statute related to homeless youth programs are met to the extent applicable.

This project additionally meets the other 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 2018-2019 Program Standards, all eligible participants are to be served with a Housing First approach. 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. Participants 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 people 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 persons 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 people 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 people 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 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, and may include 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.

This project is population-specific, serving women and transition age youth (18 to 24).

The site has a landscaped courtyard area and landscaped areas on the parking lot. Currently, the site has no designated pet relief area. However, the facility allows for pets and potential areas for a future designated area are available. Based on need, a specific pet relief area may be designated in the future. Homeless persons may choose not to seek bridge housing or shelter, even on the coldest nights, if they aren't able to find shelter for both themselves and their pet. Therefore, by allowing pets, the facility removes this issue from becoming a barrier to participants.

Another concern that may pose a barrier to seeking or entering a facility is a concern for loss of personal belongings due to lack of storage space. The project provides for storage of personal belongings and is designed to provide privacy to participants. The facility is set up with two beds in a private room with wardrobe cabinetry. Most of the rooms are furnished with two beds, only one or two rooms accommodate three beds. Therefore, the project is managed and designed to allow for the privacy of participants.

The project uses low barrier best practices that reduce barriers to entry. These practices include pet friendly facilities, harm reduction 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.

C. The Project Meets the Requirements of 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 people 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 participant'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 participant 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.

Participants are assisted with a range of activities that address the stated goals of the participant 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 people 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 people. 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 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.

Participants' 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 participant to assess progress towards achieving the goals defined in the Housing Stability Plan. All services must be tracked and information are provided to participants in HMIS with the goal of the participant 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.

D. 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...." (Public Resources Code section 21080.27(a)(2).) As noted in the communication provided by the City's Planning Department on November 27, 2019, the project site is considered a qualified site because the site is on a site that is zoned for multifamily residential use and has been previously developed for residential use.

The project site is located on an approximately 0.98-acre parcel northwest of the intersection of Lodi Place and Lexington Avenue. The site is developed with the YWCA Hollywood Studio Club, which has traditionally been used for multifamily residential uses and is surrounded by multifamily residential uses. Thus, the project qualifies as an infill site under AB 1197 CEQA exemption because the site has been previously developed with a residential use, and it is surrounded by developed residential uses. The site is zoned for Low Medium II residential use (which allows 18-29 dwelling units/net acre) and is a qualified use. The Department of City Planning has determined that the project is considered a qualified location under AB 1197.

E. The Project Involves Qualified Funding Under AB 1197

Public Resources Code Section 21080.27(a)(2)(A)-(D) exempts emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. Funding for the project is from Homeless Emergency Aid program and a reserve fund loan that will be reimbursed through State of California Homeless Housing, Assistance and Prevention Program grant receipts. Therefore, the project is consistent with the funding requirements of AB 1197. Because these funding sources are qualified funding sources under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement under AB 1197 is met.

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

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 an emergency shelter, as described above, which is located in the City of Los Angeles. The City will be leasing the emergency shelter site for this project, conducting minor alterations, and approving funding and contracts for the operation of 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.

G. The Project Involves an Eligible Public Agency taking a Qualified Action under AB 1197

Public Resources Code Section 21080.27(b)(2), exempts from CEQA certain activities by specified Eligible Public Agencies. The Eligible Public Agencies are, as follows: (A) The County

of Los Angeles; (B) The Los Angeles Unified School District; (C) The Los Angeles County Metropolitan Transportation Authority; (D) The Housing Authority of the City of Los Angeles; (E) The Los Angeles Homeless Services Authority; (F) The Los Angeles Community College District; (G) The successor agency for the former Community Redevelopment Agency of the City of Los Angeles; (H) The Department of Transportation; and (I) The Department of Parks and Recreation. AB 1197 exempts "any action by an eligible public agency to lease, convey, or encumber land owned by that agency, or to any action taken by an eligible public agency to facilitate the lease, conveyance, or encumbrance of land owned by that agency, or to any action taken by an eligible public agency in providing financial assistance, in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles."

The County of Los Angeles will provide some funding. As noted above, this action is exempt under AB 1197 because the county is an eligible public agency and providing financial assistance in furtherance of providing emergency shelters in the City of Los Angeles is an exempt activity under AB 1197 (Public Resources Code Section 21080.27(b)(2).

H. Conclusion

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

IV. THE PROJECT IS EXEMPT FROM CEQA BASED ON STATUTORY EMERGENCY EXEMPTION

A. Emergency CEQA Statutory Exemption

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

Finally, 14 California Code of Regulations (the CEQA Guidelines) section 15269, "Emergency Projects," provides examples of emergency projects exempt from the requirements of CEQA, including the following:

> (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply
>
> > (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or
> >
> > (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City's already

dangerously large homeless population. The project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

B. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately .0078 percent of the City's population (Reference 13).

In 2018, homeless persons constituted 13.5 percent of LAFD's total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (Reference 14). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Reference 15).

Los Angeles County's Chief Executive Officer reported the County spent $965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Reference 16). Consistent with that report, a 1998 study in the New England Journal of Medicine found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Reference 17).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Reference 18) This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, but is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

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

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

> [M]ortality 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.

(References 29 & 30.)

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

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Reference 20). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Reference 21). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Reference 22).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Reference 23). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (*Id*.).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Reference 24).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Reference 25).

C. Unexpected and Sudden Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Reference 26). 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 to adoption of AB 1197, 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 within the City of Los Angeles.

Among other responses to homelessness, on April 17, 2018 the Mayor and City Council of the City of Los Angeles declared a Homeless shelter crisis (Reference 27). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a four percent overall decrease in the number of persons experiencing homelessness in LA County (Reference 28).

Table 2 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary at Reference 28.

Table 2
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 ongoing efforts and the initial progress shown in 2018, the 2019 Homeless Count, released in June 2019, unexpectedly has documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in Reference 28 *Table 3 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Reference 28:

Table 3
2019 Homeless Count Data Summary

	Number of Individuals	**Change from 2018**
Sheltered Homeless	8,944	5% Increase
Unsheltered Homeless	27,221	19% Increase
Total Homeless Persons	36,165	16% Increase

The unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified in 2019, and attendant identified dangers to health, life, property and burden on public

resources present an emergency situation as defined by CEQA.

D. The Project is Exempt from CEQA Because it is Designed to Mitigate an Emergency

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

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

Finally, the fact that Section 21060.3 defines an emergency to include events beyond natural or geologic emergencies such as riots, accidents, or sabotage, shows that the dramatic increase of the already large Los Angeles-area homeless population is the type of emergency exempt from CEQA environmental review. The dramatic increase in homelessness identified in June 2019 and the attendant significant adverse public health, safety, and welfare impacts that are associated with homelessness would also be exacerbated by delaying the project in order to conduct a CEQA environmental review. The City's approval of the project to mitigate the unexpected and dramatic surge in homelessness is the type of emergency situation the legislature intended to fall outside the scope of CEQA review when it adopted Section 21080(b)(4). For these reasons, the project is statutorily exempt from compliance with CEQA as a specific action necessary to prevent or mitigate an emergency.

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