

## NOTICE OF EXEMPTION

To: ☒ Office of Planning and Research  
PO Box 3044, Room 113  
Sacramento, CA 95812 – 3044  
state.clearinghouse@opr.ca.gov

☒ County Clerk  
County of Los Angeles  
12400 Imperial Hwy, Rm 2001  
Norwalk, CA 90650

From: Los Angeles County  
Department of Health Services  
238 E. 6<sup>th</sup> Street  
Los Angeles, CA 90014

**PROJECT TITLE:** 12135 Victory Boulevard Low Barrier Navigation Center

**PROJECT LOCATION – Specific:** 12135 Victory Boulevard, Los Angeles CA 91606

**PROJECT LOCATION – City:** City of Los Angeles

**PROJECT LOCATION – County:** Los Angeles

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:** On July 23<sup>rd</sup>, 2024, the Los Angeles County Board of Supervisors, acting on behalf of the County of Los Angeles, authorized the purchase of the property at 12135 Victory Boulevard and authorized the Chief Executive Officer or her designee to 1) execute a Sale and Purchase Agreement; and, 2) enter into a lease agreement with LAFHBBuilds, Inc. (LAFHB) to allow for renovation and repurposing of the property and 3) subsequently enter in to a lease with Los Angeles Housing Family Housing Corporation (LAFHC) to operate the facility. The project consists of the renovation, adaptive reuse and operation of a 14,200-square-foot, two-story, commercial building in to a 30-bed shelter in North Hollywood on a 8,699.8-square foot site. The ground floor and first floor would include a total of 30 individual rooms for single adults experiencing homelessness. There would also be case management offices, individual restroom and shower facilities, dining area and a community room. The project would include outdoor programming to likely include minor landscaping at the entry from the parking lot and in the easement along the eastern area of the building with facilities for sitting, and a pet area; there would also be low-level security and facility lighting on the exterior. The shelter would be considered a low-barrier navigation center as it would 1) offer services to connect people to permanent housing, 2) be linked to a system that coordinates participant intake, assessment and referrals, 3) comply with applicable codes, 4) have a system for entering client information, and 5) implement best practices to reduce barriers to entry (presence of partners, pets, storage of possessions, privacy). The facility would operate 24 hours a day, 7 days a week, 365 days a year. Outdoor areas and a pet area generally would be used 7 am to 11 pm daily. Renovation would take approximately 18 months. Parking for the building is available in co-owned areas that have unrestricted access; parking is first-come basis in the lot to the rear of the building and an approximately 650-space structure 400 feet to the northwest of the site; in these areas no specific spaces area allocated but they are reasonably expected to provide at least 10 to 20 spaces to the shelter.

**NAME OF PUBLIC AGENCY APPROVING PROJECT:** Los Angeles County

**NAME OF PERSON OR AGENCY CARRYING OUT PROJECT:** Los Angeles County

**EXEMPT STATUS:**

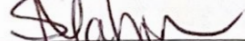
- ☐ Ministerial (Sec. 21080(b)91); 15268).  
☐ Declared Emergency (Sec 21080(b)(3); 15269(a))  
☒ Emergency Project (Sec 21080(b)(4); 15269(c))  
☒ Categorical Exemption: Class 32 In-Fill Development Projects, CEQA Guidelines Section 15332.  
☒ Statutory Exemption: City of Los Angeles Low Barrier Navigation Center, Sec 21080.27(d)(3) and 21080.27(c)(2),(3) and (5)

**REASONS WHY PROJECT IS EXEMPT:** See attachment which is incorporated herein.

**LEAD AGENCY CONTACT PERSON:** Sarah Mahin, Director, Housing for Health Los Angeles County Department of Health Services (LADHS) Telephone: (213) 833-5350

**IF FILED BY APPLICANT:** Not Applicable

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:  Date: July 23, 2024 Title: Director, Housing for Health, LADHS

☒ Signed by Lead Agency ☐ Signed by Applicant Date Received for Filing at OPR: Not applicable

July 2024

# **12135 Victory Boulevard Low Barrier Navigation Center**

## **Summary of Reasons Why Project is Exempt Attachment**

Detailed documentation of the applicable exemptions and the inapplicability of the exceptions to the use of categorical exemptions (Section 15300.2 of the State CEQA Guidelines) is available for review at Department of Health Services, 238 E. 6<sup>th</sup> Street, Los Angeles, CA 90014. A summary of this documentation is provided below.

### ***Public Resources Code [PRC], California Environmental Quality Act [CEQA] Section 21080.27(d)(3) and (c)(2), (3) and (5) – Los Angeles Exemption for Affordable Housing and Low Barrier Navigation Centers (AB 785)***

The project would meet the Government Code Section 65560 definition of low barrier navigation center (by providing for partners, pets, possessions, and privacy), would be undertaken by an eligible public agency (Los Angeles County) and would be partially funded from one of the eight sources identified in PRC 21080.27(a)(6) -- partial funding from Measure H – sales tax proceeds. Thus, the project would meet the definition of low barrier navigation center for purposes of this exemption. Consistent with PRC 21080.27(d)(3), the project would be in the City of Los Angeles and, “[a]n action to provide financial assistance in furtherance of implementing ... a low barrier navigation center...” and thus exempt from CEQA. The project would be either a public work for purposes of Chapter 1 (commencing with Section 1720) of Part 7 of Division 2 of the Labor Code, or the County would certify that any portions of the project that are not public work, will comply with prevailing wage and associated requirements [PRC 21080.27(e)].

Once the project is owned by the County of Los Angeles, for subsequent actions 21080.27(c)(2),(3)and (5) would apply –action to lease a low barrier navigation center, action to facilitate a lease, and action to provide financial assistance to a low barrier navigation center.

### ***CEQA Section 21080(b)(4), CEQA Guidelines Section 15269(c) -- Emergency Project***

Homelessness in the City and County of Los Angeles experienced a large increase from 2016 to 2023. According to the 2023 Greater Los Angeles Homeless Count, the County of Los Angeles had at the time of the count (January 2023) approximately 75,518 people experiencing homelessness countywide (a 9% increase from the previous year), including approximately 46,260 in the City of Los Angeles (a 10% increase from the previous year). The County of Los Angeles represents approximately 25 percent of the State of California’s population, but over 40 percent of the state’s unhoused population. The City of Los Angeles represents 9.6 percent of the State of California’s population, but nearly 25 percent of the state’s unhoused population. On December 12, 2022, the City of Los Angeles declared a state of emergency on homelessness and activated the city’s Emergency Operations Center. On January 10, 2023, the Los Angeles County Board of Supervisors unanimously voted to proclaim a local emergency for homelessness in the County of Los Angeles. Previously, on April 17, 2018, Mayor Eric Garcetti declared a shelter crisis to provide emergency housing for the unsheltered homeless people in the City of Los Angeles. On October 30, 2018, the LA County Board of Supervisors declared a shelter crisis to address homelessness in unincorporated LA County. This project would provide emergency temporary housing that would help prevent further emergency for those served by the project and generally help in mitigating the emergency conditions associated with the homelessness emergency and shelter crisis, and thus, the project would be exempt.

### ***CEQA Guidelines Section 15332 - Class 32 -- Infill Development Projects***

The project is consistent with applicable general plan designation and zoning. The project site is within the City of Los Angeles, is less than 5 acres and is surrounded by urban uses. There is no habitat on the site. The project would not have the potential to significantly impact traffic, noise, air quality or water quality based on proposed site improvements and anticipated changes in occupancy. Typical construction techniques for building rehabilitation would be used that would be required to comply with applicable regulations including Low Impact Development (LID) and the Noise Ordinance. The site is located in an urban area well-served by utilities and public services.

### ***State CEQA Guidelines Section 15300.2 - Exceptions to the Use of Categorical Exemptions***

None of the exceptions to exemptions, found at Section 15300.2 of the State CEQA Guidelines would apply to invalidate the Class 32 categorical exemption. Based on the record, the County has determined the following: (a) the site is not located in a sensitive environment; (b) the project would not create significant cumulative impacts by contributing to impacts of successive projects of the same type in the same place; (c) there is no potential for the project to result in a significant effect on the environment due to unusual circumstances; (d) the project would not result in damage to a scenic resource; (e) the site is not on a list compiled pursuant to Section 65962.5 of the Government Code; (f) the project would include changes to a building constructed in 1951, but the building is not significant, and therefore the project would not change the significance of any historical resource.

# Exemption Documentation

12135 Victory Boulevard  
Low Barrier Navigation Center

Sirius Environmental

July 2024

**EXEMPTION DOCUMENTATION  
THE SHEILA SHELTER/LOW BARRIER NAVIGATION CENTER  
12135 VICTORY BOULEVARD**

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# 1. PROJECT DESCRIPTION

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## *Existing Uses*

The 8,699.8-square-foot project site is currently occupied by a two-story 14,200-square-foot commercial building with a ground floor pool hall (that operates 11 am to 3 am) and vacant offices above. The site also includes a narrow concreted open area/passageway along the eastern side of the building; in addition, a narrow portion of the site along the northern property line is open and functions as a sidewalk/entry area. The building was constructed in 1951 and is a reinforced masonry structure with a wood roof and floor.<sup>1</sup>

The project site includes access to shared parking owned by an association of property owners on the project block and adjacent block to the west (including whoever owns the project site). The shared parking owned by the association is located immediately behind the site in a surface parking lot (approximately 200 spaces) as well as in a structure (approximately 650 spaces) 400 feet to the northwest on the adjacent block. The shared parking has unrestricted access and typically plenty of spaces are available. (In addition, there are about 250 surface spaces on the eastern portion of the block and about 80 surface spaces adjacent to the parking structure; these spaces are associated with individual properties. They too have unrestricted access, but some are designated for specific properties, and some are posted as for use by the associated properties with a time limit.)

Uses surrounding the project site include a mix of commercial and medical with educational uses located about a block away:

- To the north is an approximately 200-space surface parking lot (with unrestricted access) owned by an association of adjacent property owners including owners of the project site. Further north across Hamlin Street and about 500 feet from the project site is a school complex including the Roy Romer Middle School as well as magnet and charter school facilities. Approximately 750 feet to the northwest are park facilities.
- To the east and northeast are several one- to two-story, big-box retail stores – Burlington, Ross-Dress for Less and Target
- To the west are single-story commercial buildings: a banquet hall/event venue, cabaret facility and beyond that a pharmacy. Further west is a gym and the two-story West Coast University. To the northwest around the parking lot are single-story assorted commercial buildings including a bakery, dentist, nail salon and beauty academy.
- To the south across Victory Boulevard is a 24-hour medical clinic with a dialysis center to the southeast. To the southwest are two vacant buildings (two and three stories) and an approximately 20-story Well Fargo Bank building.

There are no residential uses in the immediate vicinity of the site. The closest residential uses are single-family homes on Agnes Avenue, about 600 feet to the northeast.

**Figure 1** shows an aerial view of the project site and area. The site and surrounding area are generally flat.

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<sup>1</sup> Preliminary Building Evaluation Report, 12135 Victory Boulevard, North Hollywood, Los Angeles County Public Works, April 9, 2024.

### ***Proposed Improvements (Nature, Purpose and Beneficiaries)***

#### **Shelter**

The project is the adaptive reuse of an existing commercial use into a shelter (also known as a low barrier navigation center).

**Figure 2** shows a view of the front of the building from Victory Boulevard, **Figure 3** shows a view of the back of the building from the surface parking lot.

**Indoor:** The ground floor and first floor would include a total of 30 individual rooms for single adults experiencing homelessness. There would also be case management offices, individual restroom facilities, dining area, warming kitchen, community room, and other shared spaces.

**Outdoor:** The project would include outdoor programming to likely include minor landscaping at the entry from the parking lot and in the easement along the eastern area of the building with facilities for sitting, and a pet area. The outdoor areas would be enclosed with a fence to the extent feasible. There would be low-level security and facility lighting on the exterior as well as cameras at key locations to monitor security of the facility.

**Parking:** As noted above, parking for the building is available in co-owned areas that have unrestricted access; parking is available on a first-come basis in the lot to the rear of the building and an approximately 650-space structure 400 feet to the northwest of the site; in these areas no specific spaces area allocated but they are reasonably expected to provide at least 10 to 20 spaces to the shelter.

#### **Construction**

Construction activities would be limited to seismic repairs and structural retrofitting as needed and renovation of the existing structure including demolition of interior walls and construction of new room dividing walls and new plumbing and electrical followed by interior finishing of walls and floors. Construction/renovation would take approximately 18 months and is anticipated to begin in 2024.

### ***Operational Characteristics***

The 30-bed shelter would be considered a low-barrier navigation center as it would:

- 1) offer services to connect people to permanent housing through a services plan that identifies services staffing.
- 2) be linked to a centralized coordinated entry system, so that staff in the interim facility or staff who co-locate in the facility may conduct assessments and provide services to connect people to permanent housing.
- 3) comply with applicable codes (Division 8 of the Welfare and Institutions Code)
- 4) have a system for entering client information regarding client stays, client demographics, client income, and exit destination through the local Homeless Management Information System
- 5) implement best practices to reduce barriers to entry including:
  - a. allowing for the presence of partners (couples beds)
  - b. providing for pets
  - c. providing for storage of possessions
  - d. allowing for privacy of individuals (all sleeping spaces would have private cubicles)

Similar to other shelter operations, walk-ins would not be allowed; access would be from designated pick-up locations.

Approximately 14 staff would work at the facility across three shifts – daytime, swing shift and overnight. The on-site staff would consist of: three security personnel, one kitchen staff, two maintenance/janitorial staff, two case managers, and six participant coordinators.

The facility would operate 24 hours a day, 7 days a week, 365 days a year. Outdoor rest areas and a pet area would be used generally 7 am to 11 pm daily.

The proposed project would generate approximately 26 daily weekday vehicle trips, including about 2.4 a.m. peak hour trips and about 2.7 p.m. peak hour trips.<sup>2</sup>

### ***Discretionary Actions***

The currently proposed action by the Los Angeles County Board of Supervisors, acting on behalf of the County of Los Angeles, includes authorizing the purchase of the property at 12135 Victory Boulevard and authorized the Chief Executive Officer or her designee to undertake the following:

- 1) execute a Sale and Purchase Agreement;
- 2) enter into a lease agreement LAFHBuils, Inc. (LAFHB) to allow for renovation and repurposing of the property, and
- 3) subsequently enter into a lease agreement with Los Angeles Housing Family Housing Corporation (LAFHC) to operate the facility.

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<sup>2</sup> Assuming trip generation similar to permanent supportive housing in transit priority areas: 26 trips per day per unit (0.87 trips per unit [bed] per day), 2.4 trips in the am peak hour (0.08 trips per unit) and 2.7 trips per unit in the pm peak hour. These rates are identified in the [Los Angeles Department of Transportation \(LADOT\) Transportation Assessment Guidelines](#), July 2020 (page 3-10).



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Figure 1: Aerial View of Project Site and Vicinity





Figure 2: Project Site Existing Building (from Victory Boulevard)



**Figure 3: Project Site Existing Building (from Parking Lot in Back)**

## 2. DEFINITIONS, APPLICABLE CEQA EXEMPTIONS

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### INTRODUCTION

Government Codes sections specify certain actions that are exempt from CEQA including, for example, “by-right” development.<sup>3</sup> Government Code Sections 65660 provides a definition for a Low Barrier Navigation Center (used in other regulations including CEQA as discussed below). Government Code Section 65662 indicate that actions taken to approve a Low Barrier Navigation Center (as defined) are considered “by-right” under specified circumstances, see further description below.

Public Resources Code Section 21080(b) identifies activities to which CEQA does not apply. Subsection (4) identifies “specific actions necessary to prevent or mitigate an emergency”. CEQA Guidelines Section 15269 provides guidance on emergency projects exempt from CEQA.

AB 785 was recently passed into law and codified in Public Resources Code Section 21080.27, it provides for exempting from CEQA, affordable and transitional housing as well as low barrier navigation centers (as defined) in the City of Los Angeles and unincorporated areas of the County of Los Angeles, subject to certain limitations.

Pursuant to California Public Resources Code Section 21084, the State CEQA Guidelines (Article 19, Sections 15300 to 15333) includes a list of classes of projects, which the Secretary of Resources found do not have a significant effect on the environment, and which therefore are exempt from the provisions of CEQA.

### DEFINITIONS

#### ***Government Code Section 65660***

- (a) *“Low Barrier Navigation Center” means 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. “Low Barrier” means best practices to reduce barriers to entry, and may include, but is not limited to, the following:*
  - (1) *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.*
  - (2) *Pets.*
  - (3) *The storage of possessions.*
  - (4) *Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.*
- (b) *“Use by right” has the meaning defined in subdivision (i) of Section 65583.2. Division 13 (commencing with Section 21000) of the Public Resources Code shall not apply to actions taken by a public agency to lease, convey, or encumber land owned by a public agency, or to facilitate the lease, conveyance, or encumbrance of land owned by a public agency, or to provide financial assistance to, or otherwise approve, a Low Barrier Navigation Center constructed or allowed by this section.*

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<sup>3</sup> Use by right is a use where the lead agency has no discretion over approving a project land use and therefore such a project is not subject to CEQA.

**Government Code Section 65662**

*A Low Barrier Navigation Center development is a use by right in areas zoned for mixed use and nonresidential zones permitting multifamily uses, if it meets the requirements of this article. A local jurisdiction shall permit a Low Barrier Navigation Center development provided that it meets the following requirements:*

- (a) It offers services to connect people to permanent housing through a services plan that identifies services staffing.*
- (b) It is linked to a coordinated entry system, so that staff in the interim facility or staff who co-locate in the facility may conduct assessments and provide services to connect people to permanent housing. "Coordinated entry system" means a centralized or coordinated assessment system developed pursuant to Section 576.400(d) or Section 578.7(a)(8), as applicable, of Title 24 of the Code of Federal Regulations, as those sections read on January 1, 2020, and any related requirements, designed to coordinate program participant intake, assessment, and referrals.*
- (c) It complies with Chapter 6.5 (commencing with Section 8255) of Division 8 of the Welfare and Institutions Code.*
- (d) It has a system for entering information regarding client stays, client demographics, client income, and exit destination through the local Homeless Management Information System as defined by Section 578.3 of Title 24 of the Code of Federal Regulations.*

The project would meet the definition of a low-barrier navigation center according to Government Code 65660(a). The definition of low barrier navigation center from Government Code Section 65660 is also referenced in the CEQA exemption for low barrier navigation centers in the City of Los Angeles and unincorporated areas of the County of Los Angeles (see discussion of CEQA Section 21080.27(d)(3) in Section 3 of this document).

The project would also 1) offer services to connect people to permanent housing, 2) be linked to a system that coordinates participant intake, assessment, and referrals, 3) complies with applicable codes, 4) have a system for entering client information, 5) implement best practices to reduce barriers to entry (presence of partners, pets, storage of possessions, privacy). Therefore, The project would be a low-barrier navigation center that would be a use by right if the property is acquired by the County -- the site is in a nonresidential zone (Community Commercial) where residential use is allowed (see discussion of Consistency with General Plan Designation and Zoning in Section 5 of this document). However, the action to approve funding to acquire the property would not fall within the definition of "use by right" as the property would not be owned by a public agency at the time of the action. Subsequent actions may be considered by-right.

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<sup>4</sup> The Board of Supervisors retains discretion over certain actions such as approval or allocation of funds.



**APPLICABLE STATUTORY EXEMPTIONS**

***AB 785 -- Los Angeles Exemption for Affordable Housing (and Low Barrier Navigation Centers) – Amendments to Public Resources Code Section 21080.27***

*21080.27(a)*

(4) “Eligible public agency” means any of the following:

(A) The County of Los Angeles.

...

(6) “Low barrier navigation center” means a low barrier navigation center, as defined in subdivision (a) of Section 65660 of the Government Code, that is funded in whole or in part by any of the following:

...

(B) Measure H sales tax proceeds approved by the voters at the March 7, 2017, special election in the County of Los Angeles.

...

The project would be undertaken by the County of Los Angeles, an eligible public agency as identified in Section 21080.27(a)(4).

The project would be partially funded from Measure H – sales tax proceeds (consistent with Section 21080.27(a)(6)(B)). See further discussion in Section 3 below.

(d) Subject to subdivision (e), this division does not apply to any of the following activities undertaken by an eligible public agency in the City of Los Angeles or within the unincorporated areas of the County of Los Angeles:

....

(3) An action to provide financial assistance in furtherance of implementing an affordable housing project, a low barrier navigation center, a supportive housing project, or a transitional housing project for youth and young adults.

Consistent with Section 21080.27(d)(3), the project would be in the City of Los Angeles, undertaken by an eligible public agency and would be, “[a]n action to provide financial assistance in furtherance of implementing ... a low barrier navigation center...” and thus exempt from CEQA. (See also discussion of subsection (e) below). See further discussion in Section 3 of this document.

(e) (1) (A) For an affordable housing project, low barrier navigation center, supportive housing project, or transition housing project for youth and young adults, that is not in its entirety a public work for purposes of Chapter 1 (commencing with Section 1720) of Part 7 of Division 2 of the Labor Code, this section applies only if the project sponsor certifies to the lead agency that all of the following will be met for any construction or rehabilitation work:

(i) All construction and rehabilitation workers employed in the execution of the project will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.

- (ii) *The project sponsor ensures that the prevailing wage requirement is included in all contracts for the performance of the work for those portions of the project that are not a public work.*
- (iii) *All contractors and subcontractors for those portions of the project that are not a public work comply with both of the following:*
  - (I) *Pay to all construction and rehabilitation workers employed in the execution of the work at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.*
  - (II) *Maintain and verify payroll records pursuant to Section 1776 of the Labor Code and make those records available for inspection and copying as provided in that section. This subclause does not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement that requires the payment of prevailing wages to all construction workers employed in the execution of the project and provides for enforcement of that obligation through an arbitration procedure.*
- (B) (i) *The obligation of the contractors and subcontractors to pay prevailing wages pursuant to subparagraph (A) may be enforced by any of the following:*
  - (I) *The Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to Section 1741 of the Labor Code, which may be reviewed pursuant to Section 1742 of the Labor Code, within 18 months after the completion of the project.*
  - (II) *An underpaid worker through an administrative complaint or civil action.*
  - (III) *A joint labor-management committee through a civil action under Section 1771.2 of the Labor Code.*
- (ii) *If a civil wage and penalty assessment is issued pursuant to this subparagraph, the contractor, subcontractor, and surety on a bond or bonds issued to secure the payment of wages covered by the assessment shall be liable for liquidated damages pursuant to Section 1742.1 of the Labor Code.*
- (iii) *This subparagraph does not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement that requires the payment of prevailing wages to all construction workers employed in the execution of the project and provides for enforcement of that obligation through an arbitration procedure.*
- (C) *Notwithstanding subdivision (c) of Section 1773.1 of the Labor Code, the requirement that employer payments not reduce the obligation to pay the hourly straight time or overtime wages found to be prevailing does not apply to those portions of the project that are not a public work if otherwise provided in a bona fide collective bargaining agreement covering the worker.*
- (D) *The requirement of subparagraph (A) to pay at least the general prevailing rate of per diem wages does not preclude use of an alternative workweek schedule adopted pursuant to Section 511 or 514 of the Labor Code.*

The would certify that any portions of the project that are not public work, will comply with prevailing wage and associated requirements [Section 21080.27(e)]. See further discussion in Section 3 of this document.

Once the County owns the property the following subsections of 21080.27 would apply:

- (c) *Subject to subdivision (e), this division does not apply to any of the following activities undertaken by the County of Los Angeles within the unincorporated areas of the County of Los Angeles or parcels owned by the County of Los Angeles within the City of Los Angeles:*

...

- (2) *An action to lease, convey, or encumber land for an affordable housing project, a low barrier navigation center, a supportive housing project, or a transitional housing project for youth and young adults.*
- (3) *An action to facilitate the lease, conveyance, or encumbrance of land owned or to be purchased for an affordable housing project, a low barrier navigation center, a supportive housing project, or a transitional housing project for youth and young adults.*
- ...
- (5) *An action to provide financial assistance in furtherance of implementing an affordable housing project, a low barrier navigation center, a supportive housing project, or a transitional housing project for youth and young adults.*

Once the property is owned by the County, the action to lease the building for renovation and repurposing, the action to lease the low barrier navigation center to an operator and any action to authorize funding construction would be consistent with 21080.27(c)(2),(3) and (5).

***Emergency Exemption (CEQA Section 21080(b) and CEQA Guidelines Section 15269)***

Public Resources Code Section 21080 indicates:

- (b) *This division [CEQA] does not apply to any of the following activities:*
- ...
- (4) *Specific actions necessary to prevent or mitigate an emergency.*

CEQA Guidelines indicates:

***15269. Emergency Projects***

*The following emergency projects are exempt from the requirements of CEQA.*

...

- (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.*

...

Homelessness in the City and County of Los Angeles is an emergency; there was a large increase from 2016 to 2023 and the emergency continues to grow. According to the 2023 Greater Los Angeles Homeless Count, the County of Los Angeles had during the time of the count approximately 75,518 people experiencing homelessness countywide (a 9% increase from the previous year), including approximately 46,260 in the City of Los Angeles (a 10% increase from the previous year). The County of Los Angeles represents approximately 25 percent of the State of California's population, but over 40 percent of the state's unhoused population. The City of Los Angeles represents 9.6 percent of the State of California's population, but nearly 25 percent of the state's unhoused population. On December 12, 2022, the City of Los Angeles declared a state of emergency on homelessness and activated the city's Emergency Operations Center. On January 10, 2023, the Los Angeles County Board of Supervisors unanimously

voted to proclaim a local emergency for homelessness in the County of Los Angeles. See further discussion in Section 3 of this document.

### **APPLICABLE CATEGORICAL EXEMPTION**

#### ***Infill Exemption***

CEQA Guidelines Section 15332, identifies the Class 32 Exemption as follows:

##### *15332. In-Fill Development Projects*

*Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.*

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*
- (c) The project site has no value as habitat for endangered, rare or threatened species.*
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*
- (e) The site can be adequately served by all required utilities and public services.*

The project is consistent with applicable general plan designation and zoning. The project site is within the City of Los Angeles, is less than 5 acres and is surrounded by urban uses. There is no habitat on the site. The project would not have the potential to significantly impact traffic, noise, air quality or water quality based on proposed site improvements and anticipated changes in occupancy. Typical construction techniques for building rehabilitation would be used that would be required to comply with applicable regulations including Low Impact Development (LID) and the Noise Ordinance. The site is located in an urban area well-served by utilities and public services. See Section 5 of this document for more discussion of the environmental issues associated with the CEQA In-fill Exemption.

#### ***State CEQA Guidelines Section 15300.2 Exceptions to the Use of Categorical Exemptions***

CEQA Section 15300.2 identifies the exceptions to exemptions. Categorical Exemptions do not apply where a project:

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*
- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*
- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*
- (d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock*



*outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

None of the exceptions to exemptions, found at Section 15300.2 of the State CEQA Guidelines would apply to invalidate the Class 32 categorical exemption. Based on the record, the County has determined the following: (a) the site is not located in a sensitive environment; (b) the project would not create significant cumulative impacts by contributing to impacts of successive projects of the same type in the same place; (c) there is no potential for the project to result in a significant effect on the environment due to unusual circumstances; (d) the project would not result in damage to a scenic resource; (e) the site is not on a list compiled pursuant to Section 65962.5 of the Government Code; (f) the project would include changes to a building constructed in 1951, but the building is not significant, and therefore the project would not change the significance of any historical resource. See Section 5 of this document for more detailed discussion of the exceptions to the use of categorical exemptions.

### 3. ANALYSIS -- LOS ANGELES LOW BARRIER NAVIGATION CENTER STATUTORY EXEMPTION (PRC SECTION 21080.27)

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#### **AB 785 -- LOS ANGELES EXEMPTION FOR LOW BARRIER NAVIGATION CENTERS AND AFFORDABLE HOUSING) 21080.27**

##### ***Project Location and Lead Agency [Section 21080.27(a)(4)]***

AB 785 as codified in Section 21080.27 provides for a CEQA exemption for affordable housing projects in the City of Los Angeles and unincorporated County of Los Angeles, undertaken by designated eligible agencies. The project is located in the City of Los Angeles and would be undertaken by the County of Los Angeles, an eligible public agency as identified in Section 21080.27(a)(4).

##### ***Consistency with Government Code Section 65560(a) Definition of Low Barrier Navigation Center***

The project would meet one part of the definition of “low barrier navigation center” in Section as defined in Government Code Section 65560(a) and therefore would meet one component (the other component being funding source, see discussion below) of the definition of “low barrier navigation center” within Section 21080.27(a)(6).

The intent of a low-barrier navigation center is to provide easy-to-access help for homeless people to allow them to get off the street. Low barrier navigation centers provide services aimed at comprehensive problem-solving and assistance in obtaining permanent housing solutions. Consistent with Section 65560(a) the project would:

- implement best practices to reduce barriers to entry including:
  - e. allowing for the presence of partners (couples beds)
  - f. providing for pets
  - g. providing for storage of possessions
  - h. allowing for privacy of individuals (all sleeping spaces would have private cubicles)

In addition (although not required as part of the Section 21080.27(a)(6) definition of low barrier navigation center), consistent with Sections 65560(b) and 65662, if the action to approve acquisition of the building is approved by the County, the project would become a “use-by-right”<sup>5</sup> as it would:

- offer services to connect people to permanent housing through a services plan that identifies services staffing.
- be linked to a centralized coordinated entry system, so that staff in the interim facility or staff who co-locate in the facility may conduct assessments and provide services to connect people to permanent housing.

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<sup>5</sup> Use by right is a use where the lead agency has no discretion over approving a project land use and therefore such a project is not subject to CEQA. Nonetheless, the Board of Supervisors retains discretion over certain actions such as approval or allocation of funds.

- comply with applicable codes (Division 8 of the Welfare and Institutions Code)
- have a system for entering client information regarding client stays, client demographics, client income, and exit destination through the local Homeless Management Information System

However, the action to approve funding to acquire the property would not fall within the definition of “use by right” as the property would not be owned by a public agency at the time of the action. Subsequent actions to otherwise approve the project may fall within the 65660(b) definition of use by right. The Board of Supervisors retains discretion over certain actions such as approval or allocation of funds.

### ***Funding Source [Section 2080.27(a)(6)]***

The project would be partially funded from one of the eight sources identified in Section 21080.27(a)(6) and therefore would meet the other component of the definition of low barrier navigation center identified in Section 21080.27(a)(6). The project would receive funding from 1) American Rescue Plan Act [ARPA] and 2) Measure H – sales tax [consistent with Section 2080.27(a)(6)(B)].

### ***Action to Provide Financial Assistance to Implement Low Barrier Navigation Center [Section 21080.27(d)(3)]***

Consistent with Section 21080.27(d)(3), the project is in the City of Los Angeles and would be, “[a]n action to provide financial assistance in furtherance of implementing ... a low barrier navigation center...” and thus exempt from CEQA. The action on the part of the Board of Supervisors would 1) provide funding for acquisition of the site, and 2) approve funding for and authorize actions to allow improvements to the building at 12135 Victory Boulevard to adaptively reuse it as a shelter. The actions would also provide for future leasing of the facility to an operator so that additional improvements (as needed) and shelter operations may happen as quickly as feasibly possible. Without these actions on the part of the Board of Supervisors the shelter would not proceed, and 30 people would remain on the streets for longer. (As explained in Section 4 below, the County is undertaking a number of simultaneous actions to address the homelessness emergency. While these actions do and will represent substantial progress, they still do not provide sufficient facilities to resolve the emergency conditions for many people who remain without shelter on the streets of the City and County of Los Angeles.)

### ***Public Work and Prevailing Wage [Section 21080.27(e)]***

In the event that any work were to be undertaken at some point that was not public work (for example once the project is in operation and the lessee undertook additional work), the County or lessee would certify that such portions of the project that were not public work, comply with prevailing wage and associated requirements [as outlined in Section 21080.27(e)].

### ***Property Owned by County of Los Angeles – Leasing Low Barrier Navigation Center and Financial Assistance [21080.27(c)(2), (3) and (5)]***

Once the property is owned by the County, the action to lease the building for renovation and repurposing, the subsequent action to lease the low barrier navigation center to an operator and any action to authorize funding construction would be consistent with 21080.27(c)(2), (3) and (5).

## 4. ANALYSIS -- EMERGENCY PROJECT STATUTORY EXEMPTION (CEQA SECTION 21080 AND CEQA GUIDELINES SECTION 15269)

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### *Emergency Need for Immediate Action [Sections 21080(b)(4) and 15269(c)]*

On December 12, 2022, the City of Los Angeles declared a state of emergency on homelessness and activated the city's Emergency Operations Center. On January 10, 2023, the Los Angeles County Board of Supervisors unanimously voted to proclaim a local emergency for homelessness in the County of Los Angeles.

As declared by both the City and County, homelessness is an emergency condition (see also **Attachment A**). Homelessness in the County of Los Angeles has increased catastrophically over the past decade.

According to the 2023 Greater Los Angeles Homeless Count, the County of Los Angeles had at the time of the count (January 2023) approximately 75,518 people experiencing homelessness countywide (a 9% increase from the previous year), including approximately 46,260 in the City of Los Angeles (a 10% increase from the previous year). The 2024 Greater Los Angeles Homeless Count showed people experiencing homelessness slightly decreased from 2023 (75,312 people experiencing homelessness in the County and 45,252 homeless in the City).<sup>6,7</sup> These decreases though small show that the unified response to homelessness is contributing to meaningful change. But more remains to be done and the emergency conditions remain.

The County of Los Angeles represents approximately 25 percent of the State of California's population, but over 40 percent of the state's unhoused population. The City of Los Angeles represents 9.6 percent of the State of California's population, but nearly 25 percent of the state's unhoused population.

Los Angeles County has more unsheltered homeless individuals than any other county in the United States. The County's total homeless population increased nearly 14% between January 2020 (when the homeless population was 66,436) and January 2023. In 2020 it was up approximately 12.7% from 2019, and up from about 32,000 in 2010<sup>8</sup> -- an increase of 136% in 12 years.

The LA area is experiencing an alarming increase in both younger (18 to 24 Transition Age Youth – TAY- - including households headed by someone in this age group) and older homeless people (over the age of 62). The 2020 homeless count identified a 19% increase in TAY households and unaccompanied minor children. Minor children in TAY-headed families and unaccompanied minors now comprise 7% of the homeless population. The number of homeless seniors surged by 20% in 2020.<sup>9</sup>

On April 17, 2018, Mayor Eric Garcetti declared a shelter crisis to provide emergency housing for the unsheltered homeless people in the City of Los Angeles. On October 30, 2018, and again on October 19, 2021<sup>10</sup> the LA County Board of Supervisors declared a shelter crisis to address homelessness in unincorporated LA County.

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<sup>6</sup> <https://www.lahsa.org/documents?id=8170-los-angeles-county-hc2024-data-summary>

<sup>7</sup> <https://www.lahsa.org/documents?id=8152-city-of-los-angeles-hc2024-data-summary>

<sup>8</sup> Los Angeles Homeless Services Authority, May 2017

<sup>9</sup> Ibid

<sup>10</sup> <https://file.lacounty.gov/SDSInter/bos/supdocs/162768.pdf>



The homeless population is particularly susceptible to certain diseases that can spread in unhygienic conditions found when people sleep on the street. Los Angeles County experienced a typhus outbreak in the summer of 2018.<sup>11</sup> Typhus is a disease spread by rats that is often associated with cramped unhygienic conditions. In 2017, Los Angeles County (LAC) experienced an outbreak of hepatitis A virus (HAV) occurring primarily among persons experiencing homelessness or with illicit drug use (IDU).<sup>12</sup> Contagious diseases that start in homeless populations have the potential to spread to the rest of the population. These diseases, however, appear to be dwarfed by the current Covid-19 pandemic. The current Covid-19 pandemic is anticipated to continue to severely impact the existing homeless population as well as likely forcing many more people into homelessness as they lose their jobs in the numerous business sectors impacted by stay-at-home rules and changes to business operations as a result of the ongoing pandemic.

The mortality rate among people experiencing homelessness (PEH) is higher than the mortality rate of the general population. The mortality rate among homeless individuals is influenced by demographic characteristic - youth and women, for example, have an especially high risk of early death when compared to the general population. Lack of shelter and the presence of a chronic illness also increase the likelihood of mortality in homeless individuals by 2.7-fold when compared to sheltered homeless individuals.<sup>13</sup>

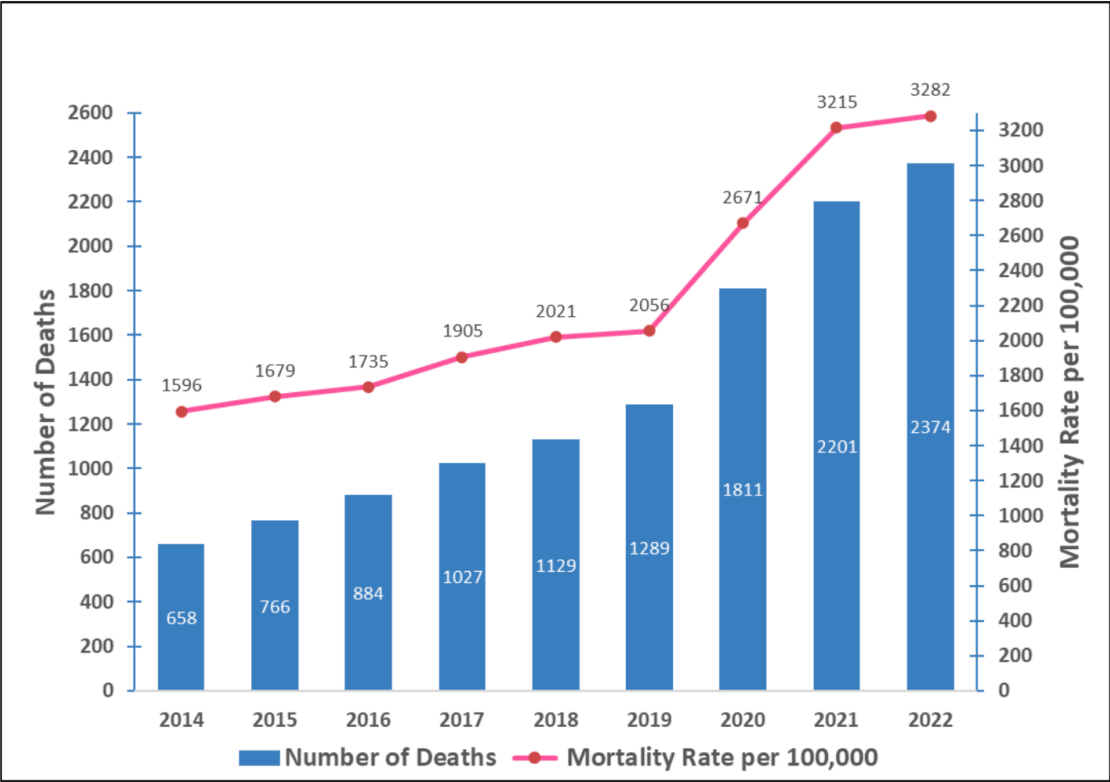
The number of homeless deaths has increased dramatically in recent years (from 658 in 2014 to 2,374 in 2022), see **Figure 4** below (note, as data becomes available number of deaths is often revised upwards in subsequent years). The 1,811 PEH deaths in calendar year 2020, represented a sharp (40%) increase from 2019.

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<sup>11</sup> <http://publichealth.lacounty.gov/eprp/Health%20Alerts/LAHANTyphusupdate101218.pdf>

<sup>12</sup> <http://publichealth.lacounty.gov/eprp/Health%20Alerts/DPH%20HAN%20Hep%20A%20Outbreak%20091917.pdf>

<sup>13</sup> Los Angeles County Department of Public Health, Center for Health Impact Evaluation. Mortality Among People Experiencing Homelessness in Los Angeles County One Year Before and After the COVID-19 Pandemic. April 2022.



**Figure 4: LA County Homeless Deaths and Mortality Rates, 2014 - 2022**

The first year of the COVID-19 pandemic coincided with a steeper increase in PEH deaths than what we had seen in previous years in LA County. While COVID-19 became the third leading cause of death among PEH in the post-pandemic onset year, the overall increase was driven to an equal or larger degree by increases in overdose, homicide, chronic heart disease, and traffic injury deaths. It appears the COVID-19 pandemic exacerbated stressors already present in the lives of PEH, leading to increases in other causes of death, even as we redoubled our COVID-19 prevention efforts in this population. Thus, as the pandemic subsides, disproportionately high mortality persists among PEH. In order to address and decrease these high mortality rates it is necessary to implement a broad array of preventive measures including housing placements, substance use prevention and treatment, physical and mental health treatment, and enhanced safety measures in areas where PEH congregate. Immediate action is needed to mitigate existing conditions.

A number of dedicated funding sources have been approved at the state and local levels to address the homeless crisis:

- \$2 billion bond in the California "No Place Like Home" initiative;
- County-wide Measure H, approved in March 2017, provides a 0.25 percent sales tax which could generate \$355 million annually for ten years to fund homeless services and prevention.

These funding sources are available for projects (including the proposed project). The Los Angeles County budget for the 2023-2024 fiscal year (FY) increased to \$43 billion. On February 7, 2023 (four weeks after declaring a local emergency on homelessness), the Board of Supervisors unanimously approved a \$609.7 million budget for the Los Angeles County Homeless Initiative for fiscal year 2023-24, the largest investment in any given year to date to prevent and address homelessness. This budget will help fund a heightened focus on three key missions for the County in collaboration with cities and other local partners:

- Reducing encampments to bring unsheltered people indoors
- Increasing interim and permanent housing placements
- Ramping up mental health and substance use disorder services for people experiencing homelessness

In addition to the \$609.7 million budget funded by 2023-24 Measure H and state Homeless Housing, Assistance and Prevention (HHAP) grants, the Board simultaneously approved an additional \$76.9 million to expand housing and services that the County provides in collaboration with local cities, as well as for innovative new programs. The FY 2023-24 Homeless Initiative Funding Recommendations approved by the Board do not encompass all the County's investments to address and prevent homelessness but represents a significant portion.

### ***Proposed Specific Action to Address Immediate Need [Sections 21080(b)(4) and 15269(c)]***

This project would involve construction of facilities (that the County would own and lease to an operator) that are necessary to provide services essential to public health, safety, and welfare by mitigating the emergency conditions associated with the homelessness emergency and shelter crisis. The project is necessary to provide shelter to people who are already in extreme conditions that expose them to the elements as well as other safety issues associated with being unsheltered. The project would get people off the street and would provide comprehensive services to address problems and assist in providing permanent solutions to homelessness. Given the increasing pressure being placed on shelters and all types of affordable housing, the project is urgently needed to mitigate the homeless situation in the City of Los Angeles and Los Angeles County.

### ***Projects Excluded from Exemption [Section 15269(c)]***

The project does not meet the CEQA guidance for exclusion from this exemption. The shelter is not a long-term project; it is a short-term project that is proposed to be undertaken as fast as possible. The situation (homelessness) that it will address is already occurring (and accelerating). The anticipated period of time to conduct additional environmental review would result in delay of providing emergency shelter. For each day of delay, 30 homeless people would spend that extra time on the street. The City and County are providing similar facilities elsewhere, but combined these activities are still insufficient. Therefore, the project (as well as all the other projects proceeding simultaneously to address homelessness

in the City and County of Los Angeles) is an emergency project in accordance with CEQA and CEQA Guidelines.

## **5. ANALYSIS -- CLASS 32 CATEGORICAL EXEMPTION AND INAPPLICABILITY OF EXCEPTIONS (CEQA GUIDELINES SECTIONS 15302, 15303 AND 15300.2)**

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### ***CLASS 32 – INFILL DEVELOPMENT CATEGORICAL EXEMPTION***

#### ***Consistency with General Plan and Zoning (Section 15332(a))***

The site is zoned C2-1L and designated Community Commercial. It is within the North Hollywood – Valley Village Community Plan Area.

Pursuant to Los Angeles Municipal Code (LAMC) Section 12.14 A.44, except within the Central City Community Plan Area, shelters for the homeless<sup>14</sup> with not more than 30 beds are allowed in the C2 zone (as long as it is at least 600 feet from another shelter) and residential yard requirements do not apply in an existing non-residential building. The minimum number of off-street parking required for a shelter located within 1,000 feet of a public transit stop may be reduced to 25 percent of the number otherwise required (up to about 8 spaces).<sup>15</sup>

Also, LAMC Section 12.81 A. allows during emergencies shelters of any size in the C2 zone (and other zones) if the shelter is operated by a religious institution or a non-profit, charitable organization and the shelter is located on property owned or leased by that institution or organization. The project would be operated by a non-profit institution that would lease the property from the County.

Also, as discussed above, Government Code Sections 65660(b) and 65662 provides that a low barrier navigation center is a use by-right on publicly owned land in areas zoned for mixed-use and non-residential zones permitting multi-family use (which the C2 zone does permit) subject to certain requirements (discussed in Sections 2 and 3 above) regarding provision of services connecting people to housing, coordinated entry, compliance with the Welfare and Institutions code and a system for entering information (all of which would apply to the project). The action to approve funding to acquire the property would *not* fall within the definition of “use by right”<sup>16</sup> as the property would not be owned by a

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<sup>14</sup> Shelters for the homeless are defined as follows in LAMC Section 12.03: A facility operated by a “provider”, other than a “community care facility” as defined in California Health and Safety Code Section 1502, which provides temporary accommodations to homeless persons and/or families and which meets the standards for shelters contained in Title 25, Division 1, Chapter 7 of the California Code of Regulations. The term “temporary accommodations” means that a homeless person or family will be allowed to reside at the shelter for a time period not to exceed six months. For the purpose of this definition, a “provider” shall mean a government agency, religious institution, non-profit charitable organization, or private non-profit organization which provides, or contracts with recognized community organizations to provide, emergency or temporary shelter for the homeless, and which has been certified by the Housing Department of the City of Los Angeles to meet all applicable requirements contained in the California Health and Safety Code and the California Code of Regulations.

<sup>15</sup> LAMC Section 12.21(4)(d) requires 1 space for each guest room for assisted living and 0.2 spaces per guest bed for skilled nursing. A shelter is most similar to a skilled nursing facility; most clients do not have vehicles. LAMC Section 12.214(m) requires that off-street automobile parking be maintained for existing buildings provided its not more parking than required for the use.

<sup>16</sup> Use by right is a use where the lead agency has no discretion over approving a project land use and therefore such a project is not subject to CEQA. Nonetheless, the Board of Supervisors retains discretion over certain actions such as approval or allocation of funds.



public agency at the time of the action. However subsequent actions to fund or otherwise approve the project may fall within the 65660(b) definition of use by right.

The project is consistent with the goals and policies of the City's General Plan; there are no adopted specific plans, approved master plans, and/or approved development plans that apply to the site.

The project would address community plan objectives to:

- *designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities*
- *make provisions for housing as is required to satisfy the needs and desires of various age, income and ethic groups of the community, maximizing the opportunity for individual choice ... including ... provid[ing] multiple- dwelling units for those who cannot afford or do not desire to own their own home...*

The project would address many of the City's goals and policies found in the Housing Element including:

- *Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.*
- *Goal 5: A City that is committed to preventing and ending homelessness.*
- *Objective 1.1: Forecast and plan for existing and projected housing needs over time with the intention of furthering Citywide Housing Priorities.*
- *Objective 1.2: Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.*
  - *1.2.2: Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.*
- *Objective 1.3: Promote a more equitable distribution of affordable housing opportunities throughout the city, with a focus on increasing Affordable Housing in Higher Opportunity Areas and in ways that further Citywide Housing Priorities.*
- *Objective 4.1: Ensure that housing opportunities are accessible to all residents without discrimination on the basis of race, color, ancestry, sex, national origin, color, religion, sexual orientation, gender identity, marital status, immigration status, family status, age, intellectual, developmental, and physical disability, source of income and student status or other arbitrary reason.*
- *Objective 5.1: Provide an adequate supply of short-term and permanent housing in addition to supportive services throughout the City that are appropriate for and meet the specific needs of all persons who are homeless or at-risk of homelessness.*
  - *5.1.1: Ensure an adequate supply of emergency and transitional housing for people who are homeless or are at a risk of becoming homeless, including people with disabilities.*
  - *5.1.2: Promote and facilitate prevention, placement and support programs and strategies that reduce the likelihood of residents experiencing homelessness, as well as shorten the time someone experiences homelessness.*
  - *5.1.5: Expand housing, shelter, and supportive services for the homeless and special needs populations in all communities, and reduce zoning and other regulatory barriers to their placement and operation.*
- *Objective 5.2: Promote outreach and education to: homeless populations; community stakeholders; health, social service and housing providers and funders; criminal justice system agencies; and communities in which facilities and services for unhoused populations will be located.*

- 5.2.1: *Identify and assess the needs of people living in unsheltered locations and connect them to services and housing opportunities including security, hygiene, and safe sleeping resources.*
- 5.2.2: *Provide a high level of outreach targeted to chronically homeless people to inform them of their rights and opportunities to move into safe, permanent housing with appropriate support services.*
- 5.2.4: *Strengthen the capacity of the Affordable Housing development community to locate, construct and manage housing facilities for the homeless.*
- 5.2.5: *In accordance with the Federal HEARTH Act, target outreach and permanent supportive housing resources to the chronically homeless so as to assist them in moving from the streets into permanent housing with appropriate supportive services.*

The project site is identified on the Housing Element Inventory of Sites, a list that identifies, “undeveloped and under-developed sites upon which the required number of housing units can be built without the need for any discretionary zoning action by the City.” Further, regarding the inventory of sites, the Housing Element indicates, “[t]he City also recognizes the importance of ensuring that sites are adequately zoned and available for the development of emergency and temporary shelters. Since 1986, the City has permitted the establishment of shelters for homeless people by-right in the R4, R5, C2, C4, C5 and CM Zones (Ordinance 161,427). Of the 21,336 parcels listed in RHNA Inventory of Sites for this Housing Element Update, 13,281 sites, ranging from 0.02 to 28.6 acres in size, have one of these zoning designations. “

### ***City Limits, Site Size (Section 15332(b))***

The 8,699.8-square-foot site is located in the City of Los Angeles and is surrounded by urban uses.

### ***On-Site Habitat (Section 15332(c))***

The project site is urban in nature and is surrounded by urban uses and does not provide habitat for endangered, rare or threatened species. There are small ornamental trees in front of adjacent properties that could potentially provide nesting habitat for birds, but these trees are not anticipated to be impacted by the project. In general birds are nesting during the period February 1 through August 31. Over 900 species of migratory birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (*Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10*) and Section 3503 of the California Department of Fish and Game Code protects nests of all birds (except English sparrows and European starlings). These regulations ensure protection of nesting birds. The nearby ornamental trees would not be impacted by construction; most construction activities would be internal to the building except for painting and these activities would be no more disruptive than existing street traffic.

### ***Traffic (Section 15332(d))***

CEQA requires that traffic impacts be evaluated based on Vehicle Miles Travelled (VMT), rather than the previously used delay-based metrics such as level of service. The proposed project would generate approximately 26 daily weekday vehicle trips, including about two a.m. peak hour trips and about three p.m. peak hour trips.<sup>17</sup> OPR recommends presuming residential development that is 100 percent

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<sup>17</sup> Assuming trip generation similar to permanent supportive housing in transit priority areas: 26 trips per day per unit (0.87 trips per unit [bed] per day), 2.4 trips in the am peak hour (0.08 trips per unit) and 2.7 trips per unit in the pm peak hour. These rates are identified in the [Los Angeles Department of Transportation \(LADOT\) Transportation Assessment Guidelines](#), July 2020 (page 3-10).

affordable to have a less than significant transportation impact.<sup>18</sup> Los Angeles County Public Works Transportation Impact Analysis Guidelines (July 23, 2020) provide screening criteria for projects considered to have less than significant impacts and are therefore not required to undertake a Traffic Impact Analysis.<sup>19</sup> These screening criteria indicate that projects that generate less than 110 vehicle trips per day and projects that are 100% affordable housing would have less than significant impacts on VMT and no Traffic Impact Analysis is required. The project would meet these two screening criteria and therefore would not have a significant impact on traffic and transportation.

The City of Los Angeles Transportation Assessment Guidelines<sup>20</sup> also includes screening criteria to screen out certain projects from detailed traffic impact studies; projects with fewer than 250 trips per day are not required to undertake a detailed study.

### ***Air Quality (Section 15332(d))***

City of Los Angeles has issued guidance indicates with respect to projects within their jurisdiction that have less than 80 residential units or 75,000 square feet of non-residential area and less than 20,000 cubic yards of soil export are not expected to result in significant construction or operational emissions/air quality impacts.<sup>21</sup> The project does not involve construction of new space, rather, it comprises renovating existing space for a shelter use with daily operations that would be less than those associated with operation of 80 market rate residential units or 75,000 square feet of non-residential use. Construction emissions would be limited to emissions from construction worker vehicles, paints and glues and off-gassing of any carpeting that would be minor. Operational impacts would be associated with minor automobile use (26 trips per day). Therefore, no air quality modeling is necessary, and impacts would be less than significant.

The project is required to comply with all applicable standards of the Southern California Air Quality Management District (SCAQMD), including provisions of District Rule 403 that limits dust associated with construction activities.

The project would include installation of high efficiency filtration systems (MERV 13) because of its location adjacent to the freeway.

### ***Noise (Section 15332(d))***

The closest sensitive receptors are the single-family homes about 600 feet to the east and the school buildings about 500 feet to the north. A 24-hour clinic and adjacent dialysis center about 100 feet to the south across Victory Boulevard could also be sensitive receptors but in general this type of patient care is not noise sensitive. In addition, the existing noise levels are dominated by high traffic volumes on Victory Boulevard; activities at the site are generally not audible above background noise levels.

The residential and school uses are separated from the site by distance and intervening buildings, therefore noise at the site would be shielded and would not be audible at these receptors above background noise levels. The medical uses are separated from the site by a major arterial with high traffic volumes and associated noise levels.

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<sup>18</sup> Technical Advisory, On Evaluating Transportation Impacts in CEQA, Governor's office of Planning and Research, December 2018, page 14.

<sup>19</sup> Los Angeles County Public Works, Transportation Impact Analysis Guidelines, July 23, 2020, pages 6 and 7.

<sup>20</sup> City of Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, July 2020, p. 2-5.

<sup>21</sup> City of Los Angeles, Infill Development Projects, Class 32 Categorical Exemption, Special Requirement Criteria, 07.23.2018.

### Construction

The project involves renovation of an existing structure, and therefore most construction activities will be interior to the existing building and therefore shielded from nearby uses.

While the project would be undertaken by the County of Los Angeles and would be required to adhere to County noise regulations, the project would also comply with City requirements with respect to noise as appropriate.

The County has established noise standards to control unnecessary, excessive and annoying noise. The standards are codified in Chapter 12.08 (Noise Control) of the Los Angeles County Code. The County Code states that no person shall operate or cause to be operated, any source of sound at any location within the unincorporated county or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed specified standards.

The County's construction noise standards are listed in Section 12.08.440 (Construction Noise) of the County Code. That Section states that, "operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited." Section 12.08.440 of the County Code includes construction noise limits based on the duration of equipment use (i.e., short- or long-term), type of land use, (i.e., single-family residential, multi-family residential, or semi-residential/commercial) and the time period (e.g., daytime or nighttime). Construction activity associated with a development project that occurs for more than 10 days falls under the scheduled and relatively long-term operation of stationary equipment. The daytime construction noise limit is 60 dBA at single-family residences, 65 dBA at multi-family residences, and 70 dBA at semi-residential/commercial areas.

LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. Demolition and construction activities are prohibited on Sundays and all federal holidays. The construction activities associated with the project (interior demolition, painting, potentially including use of power tools) would comply with these LAMC requirements.

LAMC Sections 111.0 through 116.01 regulate noise other than from construction. Noise greater than 75 dBA at 50 feet is prohibited between the hours of 7 a.m. and 10 p.m. within 500 feet of a residential zone unless compliance is technically infeasible. It is unlawful for any person to make loud, unnecessary and unusual noise that disturbs the quiet of any neighborhood.

The project would comply with LAMC Section 41.40 with respect to regulations applicable to construction. Compliance with City regulations (i.e., the Noise Ordinance) requires the applicant to incorporate all feasible noise attenuation measures such as noise mufflers and noise curtains. The construction noise would be temporary, intermittent, and typical for construction activity in urban areas such as the site. Therefore, with compliance with existing regulations construction noise impacts would be less than significant,

City of Los Angeles Building Regulations Ordinance No. 178,048, requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

### Operation

Upon completion and operation of the project, on-site operational noise would be generated by heating, ventilation, and air conditioning equipment (as at present) as well as project occupants entering and leaving the building and people and pets relaxing in the outdoor open area(s). These sources of noise would not be expected to disturb surrounding uses. As noted above, sensitive receptors are shielded from site activities by intervening buildings, and the medical uses across Victory Boulevard area across a busy roadway and project use would not be discernible above background noise.

The operation of on-site stationary sources of noise would comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Compliance with these regulatory requirements would ensure noise impacts resulting from on-site stationary sources would be less than significant.

Project traffic would not occur on residential streets and would not be substantial (26 trips /day) and therefore would not generate a significant increase in noise. Operation of the shelter would result in noise levels less than or similar to those associated with the existing uses in the area (including retail and nighttime venues). There are no noise sensitive uses within the vicinity of the project site that would be impacted by shelter operations.

By complying with all existing regulations governing both construction and operational noise, impacts would be less than significant.

### ***Water Quality (Section 15332(d))***

Construction activities could include maintenance/operation of construction equipment and handling/storage/disposal of materials that could contribute to pollutant loading in storm water runoff. However, the project consists of renovation of an existing building and ground clearing and exposure of soils is not anticipated.

The proposed project would comply with all applicable regulations with regard to surface water quality including the Los Angeles County Code. The project would also comply with the LAMC as appropriate.

Chapter 12.84 of the LA County Code requires the use of Low Impact Development (LID) principles in development projects. LID encourages site sustainability and smart growth in a manner that respects and preserves the characteristics of the County's watersheds, drainage paths, water supplies and natural resources. Section 12.80 of the County Code protects the health and safety of the residents of the County by protecting the beneficial uses, marine habitats, and ecosystems of receiving waters within the County from pollutants carried by stormwater and non-stormwater discharges. The intent of this section is to enhance and protect the water quality of the receiving waters of the County and the United States. Section 12.80 applies to the discharge, deposit, and disposal of any stormwater and/or runoff to the storm drain



system and/or receiving waters within any unincorporated area covered by a NPDES municipal stormwater permit.

The City Bureau of Engineering construction standards require contractors to include erosion control, spill prevention and control, solid and hazardous waste management, and dust control to reduce the discharge of pollutants from construction areas into the stormwater drainage system.

Conformance with applicable regulations and requirements concerning storm water discharge, and implementation of source control and treatment as applicable and appropriate, would result in the proposed project reducing discharge of potential pollutants from storm water runoff to the maximum extent practicable. The project would be connected to the city's storm water infrastructure and therefore, through this and with compliance with existing regulations and requirements, impacts would be less than significant. Therefore, the proposed project would not result in a violation of water quality standards or discharge requirements.

### ***Public Services and Utilities (Section 15332(e))***

The project residents would be within citywide population assumptions and consistent with land use planning for the project area. The project would not include new development reaching any threshold likely to generate significant demand for public services or utilities. Therefore, impacts would be less than significant.

The project would comply with all applicable provisions of the City's Fire and Building Codes, and the LAFD would review final building design to ensure adequate Code compliance. The project would include supplemental fire protection devices, such as fire alarms, fire extinguishers, emergency exits, and any necessary improvements required by the LAFD, would be included in the project design. The project site is served by LAFD Fire Station 89 located about 0.8 miles to the north of the project site. The project site is served by the North Hollywood Police Station located about 1.2 miles southeast of the project site.

The project would not impact school facilities as all residents would be temporary and families with children would be housed at different facilities. Therefore, a less-than-significant impact relative to school services would occur with the proposed project.

### ***EXCEPTIONS TO EXEMPTIONS***

#### ***Location-Sensitive Environment (CEQA Guidelines Section 15300.2(a))***

The project site is not located in an area mapped as having sensitive uses including biological resources (the site is in an urban area zoned for industrial use) or hazardous materials. The site is completely urban.

#### ***Cumulative Impacts (CEQA Guidelines Section 15300.2(b))***

CEQA defines a cumulative impact as an effect that is created as a result of the combination of a proposed project together with other projects (past, present, or future) causing related impacts. CEQA Guidelines section 15064 provides guidance on determining the significance of environmental effects caused by a project. CEQA Guidelines Section 15064(h)(1) provides guidance for determining significance of cumulative effects. If a cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

**Table 1** lists projects within one mile of the site; **Figure 5** locates those projects on a map.

Given the urban nature of the site located on a heavily travelled arterial roadway, the potential for immediately adjacent construction was considered for overlapping or cumulative impacts. The radius for identifying cumulative projects is typically determined by the potential for overlapping traffic and noise impacts. The project site is in a high noise environment (less than 0.2 miles from the 170 freeway and Victory Boulevard itself is a major east-west arterial roadway) and would generate a negligible amount of traffic (26 trips per day) and therefore the potential for overlapping impacts would not extend beyond the immediate vicinity of the site. The closest cumulative project to the site is located 0.2 miles south of the site at 6301 Laurel Canyon Boulevard; that project has been inactive since 2007 and would in any event be sufficiently buffered from the site as to not experience cumulative impacts.

Table 1 Cumulative Projects List			
Map No.	Land Use	Address	Distance to Site (mi)
1	488 condos, 572 apartments, redevelop existing shopping center and department store (Traffic Study 2007)	6301 Laurel Canyon Boulevard	0.2
2	550 student school expansion (completed)	6728 Bellingham Avenue	0.4
3	65 apartments, 99 townhomes (MND 2018)	7660 Lankershim Boulevard	1.7
4	189,184 sf office, 658 apartments, 315,816 sf retail, 1,750-seat theater (completed)	6150 Laurel Canyon Boulevard	0.4
5	80-room hotel (2018)	12425 Victory Boulevard	0.3
6	119 apartments (completed)	6514 Lankershim Boulevard	0.6
7	2,723 sf fast food w/ drive thru, 4,180 sf retail (completed)	6601 Lankershim Boulevard	0.6
8	140 condos, 16,000 sf retail (2008)	6605 Lankershim Boulevard	0.8
9	89-unit hotel (proposed 2021, on hold)	6439 Lankershim Boulevard	0.5
<b>SOURCE:</b> City of Los Angeles, Department of Transportation (LADOT) May 2024			

There are no cumulative projects in the immediate vicinity of the project. Due to the small size of the project, location of the project in an already high-noise environment, operational characteristics of the shelter (small size, low trip generation), and lack of nearby cumulative projects, the project would not have the potential to create significant cumulative impacts by contributing to impacts of successive projects of the same type in the same place.

The threshold of significance for a cumulatively considerable contribution to a traffic impact is the same as the threshold of significance for a project impact. The project would not generate new trips above the screening threshold for either the County of Los Angeles (110 trips) or City of Los Angeles (250 trips) and the shelter use would be for low income people. Therefore, the project does not require a VMT/traffic study. As a result, project trips do not have the potential to have a significant traffic impact and therefore do not have the potential to result in a considerable contribution to a cumulative traffic impact. The same is true for air quality thresholds of significance; because of the size of the project,<sup>22</sup> it would not have the potential to result in a project-specific significant air quality impact and therefore does not have the potential to result in a cumulatively considerable contribution to a significant air quality impact.

<sup>22</sup> The City of Los Angeles has undertaken air quality modeling of a variety of projects and has issued guidance indicating that projects with less than 80 residential units or 75,000 square feet of non-residential area and less than 20,000 cubic yards of soil export are not expected to result in significant construction or operational emissions/air quality impacts.

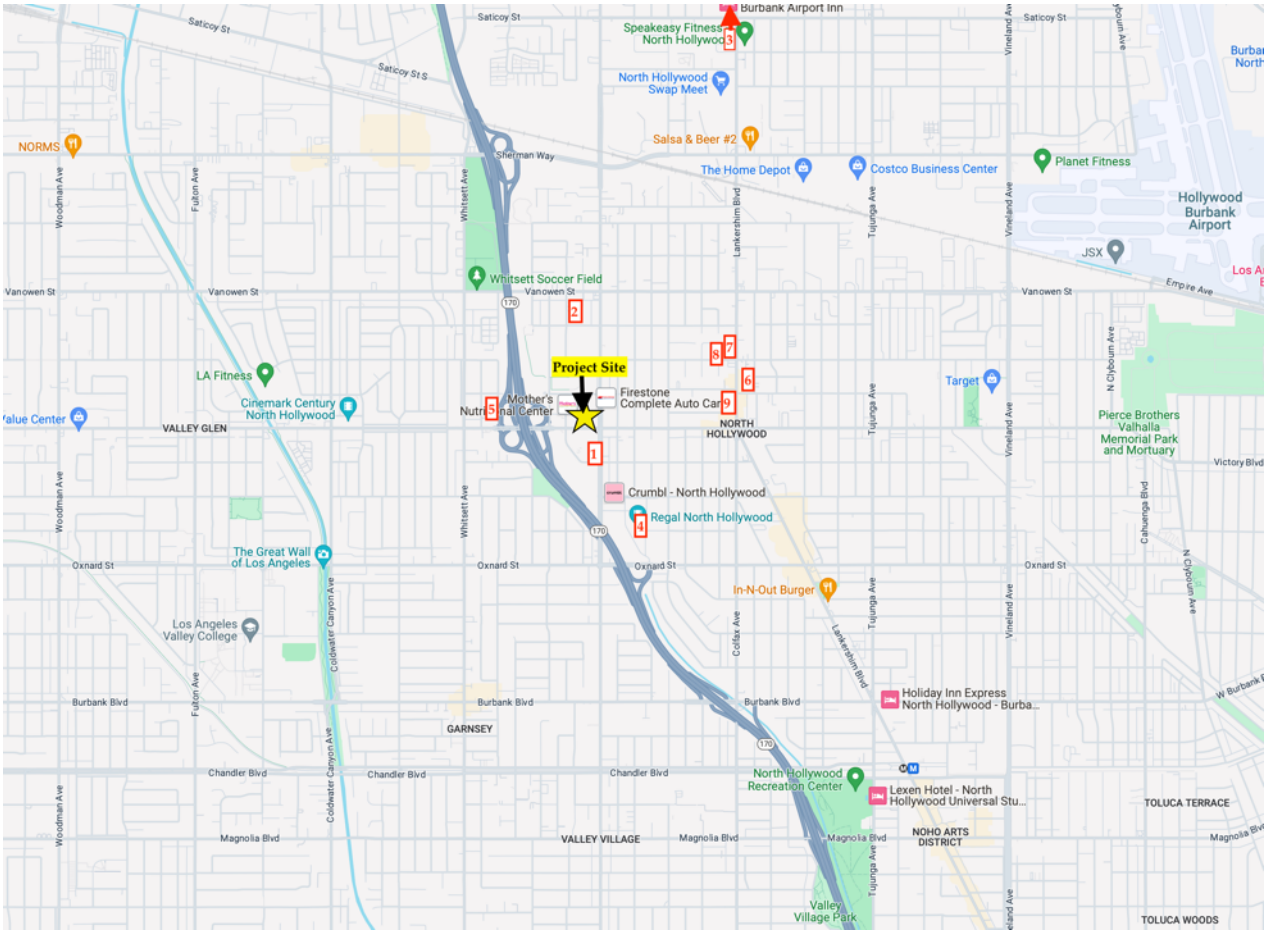


Figure 5: Cumulative Project Locations

The reuse of the existing building would result in no impacts with respect to aesthetics; in addition, the project is within a Transit Priority Area (TPA), where in accordance with SB 743, aesthetic impacts are not considered significant. No project impacts related to hazards/hazardous wastes are anticipated because any contaminated materials on the site (e.g. lead based paints and asbestos) must be addressed in accordance with stringent regulations designed to protect public health.

Minimal project impacts related to hydrology are anticipated because the site is already covered with impermeable surfaces and the project would, as applicable, be required to comply with LID<sup>23</sup> and NPDES regulations that would reduce drainage and water quality impacts to less than significant levels. The project would have no impact with respect to land use as it would be consistent with zoning and would not result in impacts that would affect adjacent uses. Any impacts in these issue areas are localized to the site and would not have the potential to combine with impacts of other cumulative projects.

Given the highly urban nature of the site with only a few street trees in the general area, there is no habitat of value to threatened, rare or endangered species on the site. Over 900 species of migratory birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (*Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10*) and Section 3503 of the California Department of Fish and Game Code protects nests of all birds (except English sparrows and European starlings). These regulations ensure protection of nesting birds. The project would not result in a considerable contribution to cumulative biological impacts.

The existing building on the site dates from 1951 and is typical of mid-century commercial development along a commercial boulevard and has no historical value. The proposed renovation would not substantially affect the exterior of the structure, therefore there would be no potential to result in a considerable contribution to impacts related to any historical issues. The project would not result in ground disturbance, and therefore would not have the potential to impact geology/soils, archaeological resources, paleontological resources or human remains. Therefore, project impacts would have no potential to combine with impacts of cumulative projects to create significant impacts on geology/soils or cultural resources.

The project would result in a density and use within the planning assumptions for the County of Los Angeles as well as the City of Los Angeles and its relatively small size would not result in a cumulatively considerable contribution to impacts on public services, recreation and utilities. Anticipated cumulative development in the area is within the planning assumptions of the City of Los Angeles.

Construction noise impacts are limited by intervening buildings, distance and the existing noise environment. The existing noise environment is high due nearby high-traffic roadways and the 170 freeway. Compliance with the Los Angeles County Code and the LAMC would further ensure noise levels remain at acceptable levels and impacts would be less than significant and would not be expected to combine with noise from any nearby sites, to result in a cumulatively significant impact.

Operational noise impacts are associated with mobile sources, stationary equipment (e.g., HVAC) and user activity. Noise from stationary equipment is regulated by ordinance and would not have the potential to

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<sup>23</sup> Chapter 12.84 of the LA County Code requires the use of Low Impact Development (LID) principles in development projects. LID encourages site sustainability and smart growth in a manner that respects and preserves the characteristics of the County's watersheds, drainage paths, water supplies and natural resources. Section 12.80 of the County Code protects the health and safety of the residents of the County by protecting the beneficial uses, marine habitats, and ecosystems of receiving waters within the County from pollutants carried by stormwater and non-stormwater discharges. The intent of this section is to enhance and protect the water quality of the receiving waters of the County and the United States. Section 12.80 applies to the discharge, deposit, and disposal of any stormwater and/or runoff to the storm drain system and/or receiving waters within any unincorporated area covered by a NPDES municipal stormwater permit.

result in significant impacts that would noticeably combine with cumulative projects. Noise impacts from user activity would not affect nearby uses.

Mobile source noise is related to vehicle use, it is most concentrated at the site and then disperses to all the different destinations of project users who arrive/depart by vehicle. The project contribution to mobile-source noise levels at the site would be minor and would be even less with distance from the site and therefore the project's contribution to mobile source noise levels as a result of cumulative projects would be negligible.

### ***Significant Effect Due to Unusual Circumstances (CEQA Guidelines Section 15300.2(c))***

There is nothing unusual about the shelter or the project site. As explained in more detail above, for some environmental issue areas, because of the location of the project site (urban area, high noise environment), small size of the project, and expected operational characteristics, the project would not have the potential to result in significant environmental impacts with respect to any environmental issue area.

None of the following issue areas would be significantly impacted by the project: aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, tribal cultural resources, or public utilities/service systems issues and therefore would not have the potential to result in a considerable contribution to these impacts (see discussion of cumulative impacts above).

### ***Scenic Highways and Scenic Resources (CEQA Guidelines Section 15300.2(d))***

The project site is in an urban area of the City of Los Angeles. It is not visible from any State-designated scenic highway.<sup>24</sup> The closest highway with any State scenic designation is the I-210, that is officially identified as "eligible" and is about 6 miles to the east of the project site. As explained further below, while the building dates from 1951, it is not an historical resource and therefore the project would not make substantial changes to the appearance of an existing on-site historic resource.

### ***Hazardous Waste Sites (CEQA Guidelines Section 15300.2(e))***

A Phase I Environmental Site Assessment was undertaken for the site.<sup>25</sup> Envirostor (**Figure 5**) and Geotracker (**Figure 6**) websites indicate that the site does not appear on any list of contaminated sites or facilities.

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<sup>24</sup> <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>; accessed May 8, 2024

<sup>25</sup> Phase I Environmental Site Assessment, Leighton Consulting, Inc. 2024



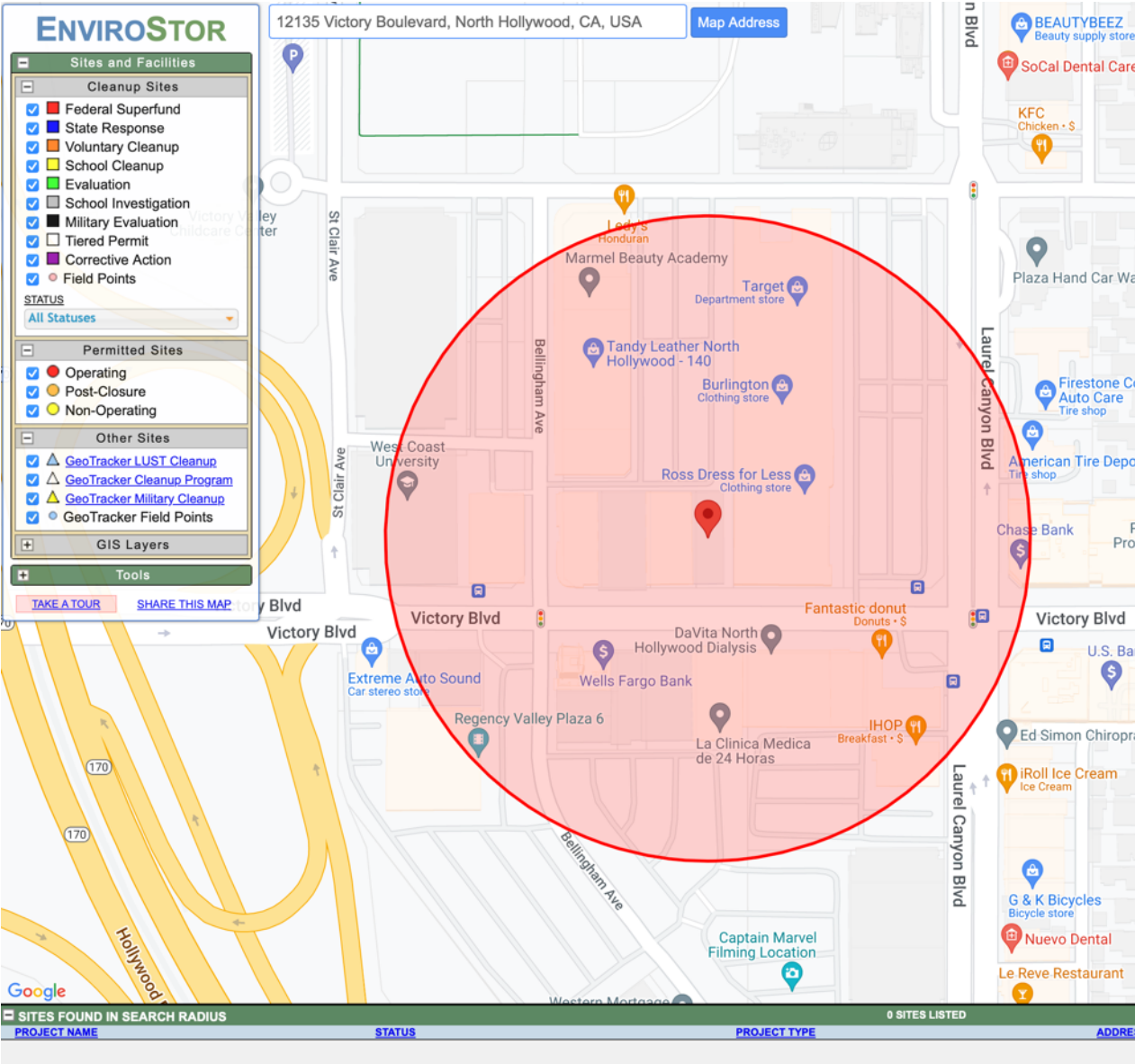


Figure 6: Envirostor Map

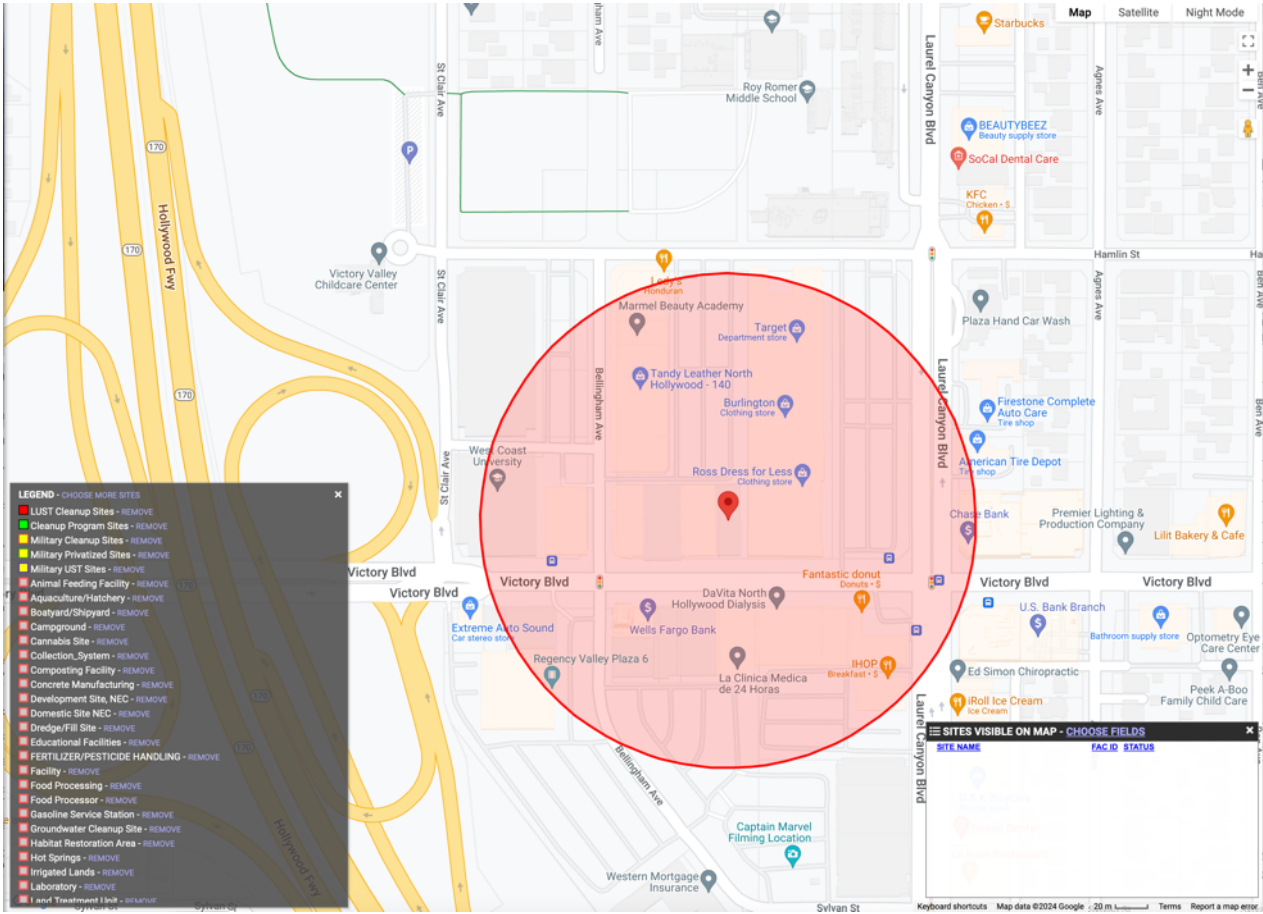


Figure 7: Geotracker Map

***Historical Resources (CEQA Guidelines Section 15300.2(f))***

A historic building assessment was undertaken for the site (see **Attachment B**).<sup>26</sup> The existing building on the site dates from 1951. SurveyLA conducted a Historic Resources Survey Report North Hollywood-Valley Village Community Plan Area that identified eligible historic residential and commercial properties. The project site was not identified as an eligible historic resource in the SurveyLA survey evaluation either as an individual historic resource or as a contributing building to an eligible historic district.

There is no evidence that any historic persons, businesses, or events are associated with the property at 12135 Victory Boulevard. The property is not associated with the early history of the San Fernando Valley as Tract 15405 was subdivided in developed in the mid-20th Century. The property is typical of mid-century commercial development along a commercial boulevard. The building is a modest vernacular commercial building with International Style influences. The building is not an excellent or exceptional example of the International Style. The building is not the work of a master architect or builder. The building materials and construction techniques are unremarkable and are not the work of a master craftsman.

The property at 12135 Victory Boulevard does not meet the criteria for eligibility as a historic resource. There is no eligible historic district that includes the subject property. The building is not eligible for inclusion on the National Register of Historic Places, the California Register of Historical Resources or as City of Los Angeles Historic-Cultural Monuments either as an individual resource or as a contributing building to an eligible historic district.

No excavation is proposed in connection with the project. All work would be interior renovation. If any exterior digging encountered unexpected archaeological or paleontological resources such resources must be evaluated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5(e) address how unexpected finds of human remains are to be handled. These regulations would reduce impacts to a less than significant level.

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<sup>26</sup> Historic resources Evaluation Memo, 12135 Victory Boulevard, Los Angeles, APN: 2322-006-035

**Education**

Sussex University, England, Chemistry, concentration in Environmental Science  
Master's degree, Candidate, Environmental Management, University of San Francisco

**Professional Affiliations**

Association of Environmental Professionals  
Los Angeles Conservancy  
American Planning Association

Ms. Lockwood is an environmental consultant with over 25 years' experience in the preparation of environmental documents pursuant to the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). She has been the Project Manager for major projects and technical task leader on complex projects involving noise, air quality, energy, and hazardous wastes/materials issues. Ms. Lockwood has broad knowledge and understanding of State and local planning regulations and regional planning documents in Southern California. She has participated in the preparation of environmental documentation for over 500 projects.

Ms. Lockwood has experience with a wide variety of projects, issues and communities and using this experience is able to quickly identify and address issues of potential concern before they become major problems. Her technical background allows her to review complex documentation and identify potential analytic flaws. For these reasons, Ms. Lockwood is frequently asked by lead agencies, larger consulting firms, and lawyers to provide detailed review and recommendations concerning CEQA and NEPA documents, including providing overall advice concerning approach and content of environmental documents, critical review of completed documents/analyses as well as providing specific review of more complex projects and/or issues.

In January 2006, Ms. Lockwood started the small environmental consulting firm of Sirius Environmental (Sirius). Sirius (WBE/SBE/VSBE) is an environmental consulting firm that provides CEQA and NEPA related services. Sirius Environmental was formed to focus on project and program management of projects and programs requiring a detailed understanding of CEQA and NEPA and requiring responsive, individualized management. Sirius Environmental provides support to developers, engineers, consulting firms and public agencies in the preparation of clear, accurate technical reports and documents that meet the increasingly demanding needs of communities and their decision makers.

Ms. Lockwood's areas of technical specialty are land use, energy conservation, noise, air quality, greenhouse gas emissions and hazardous materials. She has overseen the preparation of numerous technical analyses for a variety of projects – small and large. She is familiar with land use regulation and prepares policy consistency analyses for projects in complex regulatory environments as well as aesthetic analyses for projects in urban and rural environments.

Ms. Lockwood is an experienced CEQA and NEPA project manager. She has overseen the preparation of comprehensive environmental documents for a variety of different projects, managing complex technical analyses and providing advice to clients regarding effective mitigation strategies. She is familiar with recent case law with respect to environmental documentation. She undertakes public outreach for controversial projects in a number of sensitive communities.

Ms. Lockwood provides QA/QC for a variety of projects including transportation projects (Regional Transportation Plans, Mid-Coast Corridor Transit Project, Orange Line Extension), policy documents (City of Los Angeles CEQA staff training, Updated Thresholds Guide) and plans (Mobility Element, Hollywood Community Plan, Boyle Heights Community Plan).

Ms. Lockwood emphasizes quality. She ensures that information is complete, accurate, concise, and understandable to the reader.

# Attachments



## **Attachment A – Emergency Documentation**

# Los Angeles County Homeless Emergency

Heidi Behforouz, MD ([hbeforeouz@dhs.lacounty.gov](mailto:hbeforeouz@dhs.lacounty.gov))

Revised July 2024

## The Homelessness Emergency in Los Angeles County

Street-based homelessness is a long-standing challenge for Los Angeles County. However, its continued growth, the rising comorbid complexities of undertreated medical, mental health, and substance use disorders facing this population, coupled with its disproportionate reliance on public social services, make homelessness a public health emergency. Homelessness not only threatens the wellbeing of those who are without a home, but also threatens the economic stability of impacted communities as well. Los Angeles County currently has the highest number of homeless residents in the United States.<sup>1</sup>

In February 2022, the Los Angeles and South Coast region (49.9%) and the San Francisco Bay Area (22.2%) had the highest shares of unhoused individuals, followed by the Sacramento Region (7.2%).<sup>2</sup> Los Angeles County specifically is home to more than 40% of unhoused Californians, based on point-in-time data.<sup>2</sup> This is in part due to its dense population, high housing costs, and general lack of affordable housing.

According to the 2023 Greater Los Angeles Homeless Count, the County of Los Angeles had at the time of the count (January 2023) approximately 75,518 people experiencing homelessness countywide (a 9% increase from the previous year), including approximately 46,260 in the City of Los Angeles (a 10% increase from the previous year). The 2024 Greater Los Angeles Homeless Count showed people experiencing homelessness slightly decreased from 2023 (75,312 people experiencing homelessness in the County and 45,252 homeless in the City).<sup>3,4</sup> These decreases though small show that the unified response to homelessness is contributing to meaningful change. Across the County unsheltered homelessness dropped by 5.1% while the number of people in shelter rose by 12.7%; in the City of Los Angeles unsheltered homelessness dropped by 10.4% while the number of people in shelter rose by 17.7%. But more remains to be done and the crisis and emergency conditions remain.<sup>5</sup>

The County of Los Angeles represents approximately 25 percent of the State of California's population, but over 40 percent of the state's unhoused population. The City of Los Angeles represents 9.6 percent of the State of California's population, but nearly 25 percent of the state's unhoused population.

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<sup>1</sup> The U.S Department of Housing and Urban Development, Office of Community Planning and Development. December 2022. The 2022 Annual Homelessness Assessment Report (AHAR) to Congress. <https://www.huduser.gov/portal/sites/default/files/pdf/2022-AHAR-Part-1.pdf>

<sup>2</sup> Davalos, M., & Kimberlin, S. March 2023. Who is experiencing homelessness in California? California Budget and Policy Center. <https://calbudgetcenter.org/resources/who-is-experiencing-homelessness-in-california/>

<sup>3</sup> <https://www.lahsa.org/documents?id=8170-los-angeles-county-hc2024-data-summary>

<sup>4</sup> <https://www.lahsa.org/documents?id=8152-city-of-los-angeles-hc2024-data-summary>

<sup>5</sup> <https://www.lahsa.org/documents?id=8164-2024-greater-los-angeles-homeless-count-results-long-version-.pdf>

To address the increasing number of persons experiencing homeless (PEH), on December 12, 2022, the City of Los Angeles, through its mayor, Karen Bass, declared a state of emergency on homelessness.<sup>6</sup> In solidarity with the city, On January 10, 2023 the Los Angeles County Board of Supervisors proclaimed a local emergency for homelessness in the County of Los Angeles.<sup>7</sup> The governor of California, Gavin Newsom, has also expressed interest in reducing homelessness across California and asked state lawmakers to join him in his effort.

## **Mortality Among People Experiencing Homelessness**

The COVID-19 pandemic and the parallel rise in fentanyl trafficking brought widespread disruption and death to People experiencing homelessness (PEH) in LA County and widened the gap in mortality between PEH and the general population. Both factors likely also had broader indirect effects on other causes of death, including Coronary Heart Disease (CHD), transportation-related injury, and homicide. In 2023, there were a total of 900 deaths of unhoused people in the City of Los Angeles.

In 2023, there were a total of 900 deaths of unhoused people in the City of Los Angeles<sup>8</sup>:

- Most common mode of death: Accident (75%)
- 40 unhoused people were murdered in 2023, which is 12% of all homicides in the City of LA. Unhoused people are only about 1% of the population.
- At least 73% of deaths were in streets or areas without proper utilities, such as tents, parking lots, parks, RVs, and vacant buildings.
- Most common place of death: Street/Freeway/Tunnel/Sidewalk
- Black people were 31% of deaths. Black people are only 8% of the City's general population but are 33% of the City's unhoused population.
- Council Districts 14 and 1 had the highest numbers of deaths as well as some of the highest unhoused populations.
- January, February, and March were the deadliest months.

The mortality rate among people experiencing homelessness (PEH) is higher than the mortality rate of the general population. The mortality rate among homeless individuals is influenced by demographic characteristic. For example, homeless youth and homeless women, have an especially high risk of early death when compared to the general population. Lack of shelter and the presence of a chronic illness also increased the likelihood of mortality in homeless individuals by 2.7-fold when compared to sheltered homeless individuals.<sup>9</sup> The emergent morbidity and mortality threats of the opioid epidemic, undertreated complex medical and mental health issues, as well as the ongoing risk of Covid-19 facing the homeless, supported by official declarations of both homelessness crises in Los Angeles County, are emergencies involving clear and imminent danger. Rapid construction of interim housing (IH), shelters with services, as well as permanent supportive housing (PSH) are necessary to prevent and/or mitigate these emergency conditions.

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<sup>6</sup> City of Los Angeles, Mayor Karen Bass. December 12, 2023. Declaration of Local Emergency. 20221212 Mayor Emergency Declaration Homelessness Crisis signed by clerk.pdf (lacity.gov)

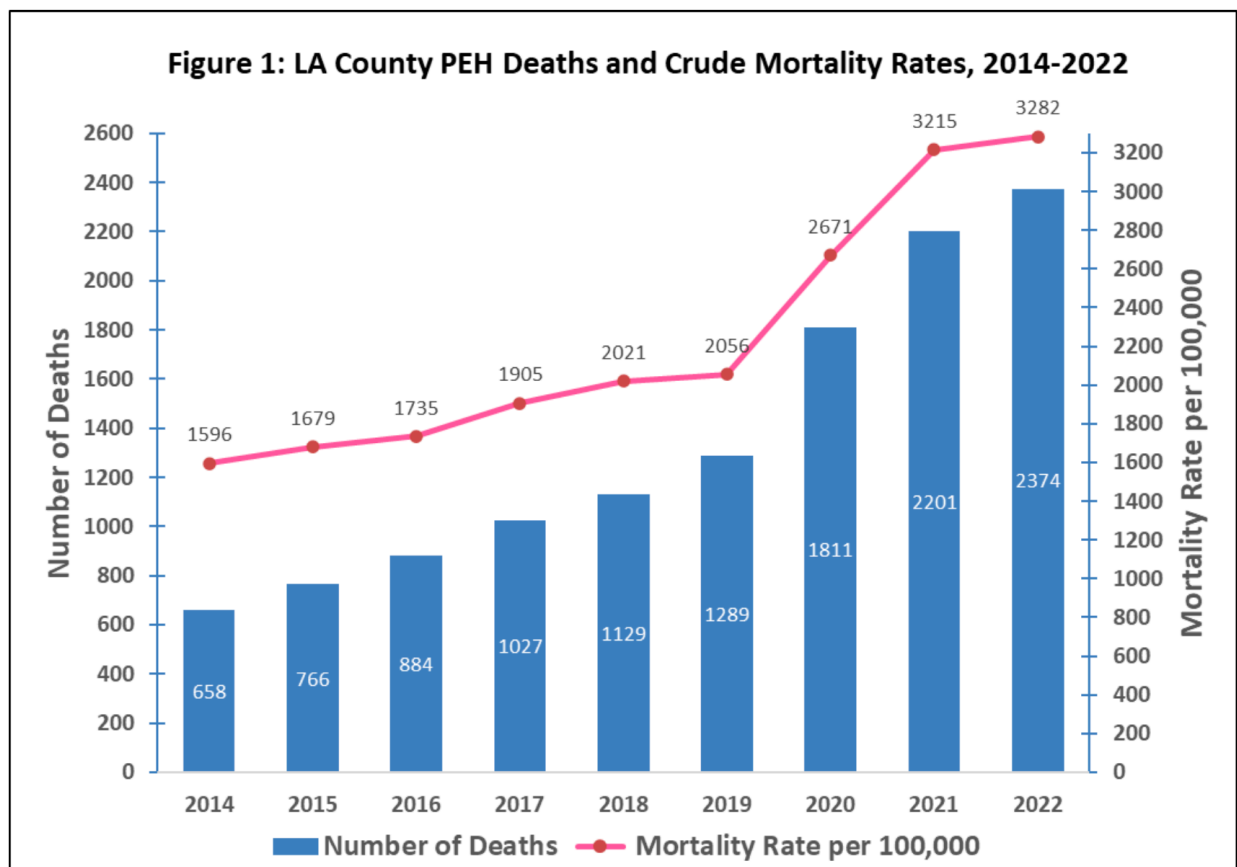
<sup>7</sup> Motion by Supervisors Lindsey P. Horvath and Kathryn Barger. January 10, 2023. Proclamation of a Local Emergency for Homelessness in the County of Los Angeles

<sup>8</sup> This dataset was obtained from the LA County Medical-Examiner Coroner 2023.

<sup>9</sup> Los Angeles County Department of Public Health, Center for Health Impact Evaluation. Mortality Among People Experiencing Homelessness in Los Angeles County One year before and after COVID-19 Pandemic April 2022

As climate change worsens, it has become more lethal for people who cannot seek relief. According to David Eisenman, a professor specializing in climate change at the UCLA Fielding School of Public Health, heat-related illness and death are “notoriously” undercounted because patients in emergency rooms are frequently diagnosed with other medical conditions, such as dehydration and kidney failure, without any mention of their high temperatures and exposure to heat.<sup>10</sup>

The number of homeless deaths has increased dramatically in recent years (from 658 in 2014 to 2,374 in 2022), see **Figure 1** below (note, as data becomes available number of deaths is often revised upwards in subsequent years). The 1,811 PEH deaths in calendar year 2020, represented a sharp (40%) increase from 2019. (See also **Table 1** below.)



<sup>10</sup> Lin, S. February 19, 2023. Heat Waves are Killing more L.A. Homeless People. *Los Angeles Times*. <https://www.latimes.com/california/story/2023-02-19/la-me-homeless-heat-deaths#:~:text=About%20150%20people%20die%20every,Los%20Angeles%20Urban%20Cooling%20Collaborative.>

**Table 1 - Number and Characteristics of LA County Deaths among PEH, 12 Months Pre- and Post-pandemic Onset**

Characteristic	Pre-Pandemic Numbers 4/01/19-3/31/20	Post-Pandemic Numbers 4/1/20-3/31/21	Absolute Increase	% Increase
All deaths	1271	1988	717	56%
<b>Gender</b>				
Male	1037	1618	581	56%
Female	233	370	137	59%
<b>Age</b>				
18-29	85	175	90	106%
30-49	373	633	260	70%
50-64	585	842	257	44%
65+	228	338	110	48%
<b>Race/Ethnicity</b>				
Black/African American	325	515	190	58%
Asian	16	34	18	113%
Hispanic/Latinx	486	820	334	69%
White	426	592	166	39%
Other <sup>1</sup>	18	27	9	50%
<b>Cause of Death</b>				
Drug Overdose	402	715	313	78%
Coronary Heart Disease	239	309	70	29%
COVID-19	0	179	179	NA
Traffic Injury	113	150	37	33%
Homicide	70	104	34	49%
Suicide	55	64	9	16%
Other Unintentional Injuries	54	57	3	6%

<sup>1</sup> Includes American Indian/Alaska Native, Native Hawaiian/Pacific Islander, multiracial, and refused/unknown

Age Group Deaths increased more among younger PEH than among older PEH. The number of deaths among those aged 18-29 more than doubled from 85 in the pre-pandemic to 175 in the post-pandemic onset year. Among 30-49 year-olds, there were 260 more deaths in the post-pandemic onset year, representing a 70% increase. Both the absolute and relative increases in deaths among those aged 30-49 exceeded those among 50-64 year-olds and among those aged 65+. Gender Relative increases in deaths were similar among males (56%) and females (59%) although the absolute increase was much greater among males (581) than females (137). This can largely be attributed to the fact that the homeless population in LA County has historically consisted of approximately 2 males for every 1 female. The six leading causes of PEH deaths, in the pre-pandemic year, in ranked order, were drug overdose (OD) (32%), coronary heart disease (CHD) (19%), traffic injury (9%), homicide (6%), suicide (4%), and other unintentional injuries (4%) (Table 1). In the post-pandemic onset year, these six causes maintained their relative rankings, but COVID-19 became the third leading cause of death, with 179 (9%) deaths. Among the other leading causes of death, Overdose (OD) saw the greatest relative increase of 78% from the pre- to post-pandemic onset year, followed by homicide (49%), traffic injury (33%), CHD (29%), suicide (16%) and other unintentional injuries (6%).<sup>5</sup>

Deaths among young unhoused people ages 18 to 29 more than doubled in two years. The findings show that deaths among young unhoused people increased at a greater rate than their older counterparts. Overdose deaths among unhoused people ages 18-29, also more than doubled from the pre- to post- pandemic onset year. The primary cause for overdosing was fentanyl use. Young people were left out of COVID resources because they were more likely to survive. Therefore, young people were forced further and further into isolation which exacerbated drug



use and using alone, which is how the overdose deaths kept rising. Without the necessary investment of early intervention, young PEH will become the chronically ill and chronically homeless.

By far the greatest contributor to the increase in PEH deaths was drug overdose (OD). These OD deaths increased the most among those aged 18-29 and 30-49 and among Latinx and Black PEH, although increases were also considerable among White PEH. The increase in OD deaths was slightly greater among men than among women. The drug type with the greatest increase in OD death involvement was fentanyl, which rose from 27% to 45% from the pre-to post-pandemic onset year.<sup>5</sup> This increase in fentanyl-involved deaths was relatively similar across all racial/ethnic groups, among both men and women, and across all age groups. Despite this large increase in fentanyl involved deaths, there was no decrease in deaths involving methamphetamine, which contributed to about three quarters of all deaths across both years. Methamphetamine involvement in OD deaths differed somewhat by race/ethnicity, with the highest percentages among White PEH and the lowest among Black PEH. Notably, 18-29 year-olds were the demographic group with the greatest increase in methamphetamine-involved deaths.

The first year of the COVID-19 pandemic coincided with a steeper increase in PEH deaths than seen in previous years in LA County. While COVID-19 became the third leading cause of death among PEH in the post-pandemic onset year, the overall increase was driven to an equal or larger degree by increases in OD, homicide, CHD, and traffic injury deaths. It appears the COVID-19 pandemic may have exacerbated stressors already present in the lives of PEH, leading to increases in other causes of death, even as COVID-19 prevention efforts redoubled in this population. Thus, as the pandemic subsides, disproportionately high mortality will likely persist among PEH unless a broad array of preventive measures are implemented including, housing placements, substance use prevention and treatment, physical and mental health treatment, and enhanced safety measures in areas where PEH congregate.

The exact causes of mortality among the homeless population in Los Angeles County are diverse. Drug overdoses are increasingly intertwined with the homelessness crisis. Overdoses were responsible for 36 % of total PEH deaths, a 78% increase from the previous year. Suicide is also common among this population. Unfortunately, the unhoused in Los Angeles were more likely to die on sidewalks, in vacant lots, on park benches and on the beach — a rash of profoundly lonely and yet very public deaths. As the number of homeless individuals in the county continues to increase, so does the number of residents at a higher risk for early death because of their lack of housing and their consequential struggles.

### **Aging Homeless Population**

There has been an increase in senior homelessness. Not only with seniors experiencing mental illness or substance abuse problems, but seniors are being pushed into the streets due to rising rents. Over 40% of Californians in adult-only households who came in contact with the homelessness response system in the 2021-22 fiscal year were aged 50 and older. Financial and medical emergencies later in life can push those who were already struggling to make ends meet into homelessness. Challenges in accessing support and social safety net programs for older adults in crisis and inadequate benefit amounts are also a driving factor.<sup>2</sup> Navigating sidewalks in wheelchairs and walkers, aging PEH are not only dealing with mobility issues, but also cognitive and chronic problems like diabetes. Many contracted COVID-19 or couldn't work because of

pandemic restrictions. Academics project the number of seniors experiencing homelessness will nearly triple over the next decade, challenging policymakers from Los Angeles to New York to imagine new ideas for sheltering the last of the baby boomers as they get older, sicker, and less able to pay spiraling rents. Advocates say much more housing is needed, especially for extremely low-income people.<sup>11</sup>

Older adults are more likely to have underlying health conditions and disabilities that may be exacerbated by the additional stressors of being unhoused. Experiencing homelessness is already tied to severe health declines as research shows unhoused adults develop similar rates of geriatric conditions as housed adults who are 20 years older. The distinctive circumstances older adults face, require more assistive services to obtain and maintain housing. As such, older unhoused Californians have significant implications for current homeless intervention practices as specific service needs should be integrated with other service systems and funding sources<sup>2</sup>

## **Chronic Disease**

The emergence of chronic illnesses in a person does not stop because an individual has become homeless. Chronic illnesses range from mild, occasional symptoms to debilitating, progressive conditions. Chronic diseases often require ill individuals to adjust their lifestyles, employment, and medical care to meet their needs.<sup>12</sup> However, a lack of consistent housing and access to essential medical treatment from doctors can seriously exacerbate chronic illnesses in the homeless. A variety of non-communicable chronic illnesses are prevalent in PEH individuals, such as chronic obstructive pulmonary disease (COPD), arthritis, diabetes, seizures, and musculoskeletal disorders.<sup>13</sup> Homeless individuals also commonly experience respiratory tract infections as well as oral and dental issues resulting from a lack of access to proper care.

Moreover, without a permanent address or ready access to a birth certificate and identification, seemingly routine tasks become considerable barriers when seeking services, benefits, and jobs. As previously mentioned, many homeless people suffer from chronic illnesses such as diabetes.<sup>14</sup> Diabetic patients require access to refrigeration to store their insulin properly, and homelessness denies diabetic patients' reliable access to a refrigerator. Simply taking a pill twice a day suddenly becomes a logistical challenge.

## **Communicable Disease Risk (Including Covid-19)**

Homeless individuals contend with a higher risk of contracting certain communicable diseases such as Tuberculosis (TB). TB is an extremely infectious and dangerous respiratory illness that spreads through exposure to infected air droplets. The conditions in which homeless individuals

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<sup>11</sup> [America's homeless population is getting older - Los Angeles Times \(latimes.com\)](https://www.latimes.com/local/lanow/la-fi-ln-homeless-older-2022-04-26.html) By Anita Snow  
Associated Press April 26, 2022

<sup>12</sup> Institute of Medicine and US Committee on Health Care for Homeless People, *Homelessness, Health, and Human Needs* (Washington, D.C.: National Academy Press, 1988), accessed September 09, 2020, <https://www.ncbi.nlm.nih.gov/books/NBK218236/>

<sup>13</sup> "Chronic Illnesses/Diseases and Mortality," The Homeless Hub, accessed September 16, 2020, <https://www.homelesshub.ca/about-homelessness/health/chronic-illnessesdiseases-and-mortality>)

<sup>14</sup> C. Y. Liu, S. J. Chai, and J. P. Watt, "Communicable Disease among People Experiencing Homelessness in California," *Epidemiology and Infection* 148 (2020): accessed September 10, 2020, doi:10.1017/s0950268820000722)

often live do not have proper ventilation, are subject to overcrowding, and continuously shifting groups of people—all of which favor the spread of TB.<sup>15</sup>

The homeless population is particularly susceptible to certain diseases that can spread in unhygienic conditions when people sleep on the street. Typhus is a disease spread by rats that is often associated with cramped unhygienic conditions. Flea-borne typhus cases have been increasing across LA County. Currently, there are two outbreaks in metropolitan Los Angeles: one in the neighboring communities of Eagle Rock and Glassell Park and the other in the neighboring communities of Wholesale District and Boyle Heights.<sup>16</sup> *Bartonella quintana*, scabies, Hepatitis A (HAV), and Norovirus can result from inadequate care (or access) for personal hygiene. Typhus, HAV, and various skin and soft tissue infections (SSTI's) are possible results of inadequate access to proper resting places. Many risk factors, such as increased exposure to pathogens, weakened immune systems, and decreased healthcare access, increase the homeless population's susceptibility to infectious diseases. Many of these factors can be mitigated by access to the services available in stable housing.<sup>17</sup>

Various behavioral risks also place members of the LA homeless community at a higher risk for certain diseases. Once again, access to sustainable housing, with the addition of mental health services and counseling, can help halt or lessen these risky behaviors, helping stop the spread of these potentially deadly diseases. High-risk sexual activities, sometimes in exchange for money, shelter, or drugs, can result in various sexually transmitted infections (STI's) such as Syphilis, Gonorrhea, and HIV. Substance use is also a risk factor for certain blood-borne diseases, including Hepatitis A, B, and C, HIV, and Methicillin resistant *Staphylococcus aureus*, otherwise known as Staph Infection.

The Covid-19 pandemic increased the homeless population substantially. More than 60,000 people were experiencing homelessness in Los Angeles prior to the pandemic and it is estimated that the number climbed to more than 69,000 in the past two years. People continue to lose their jobs, and some of the Covid-19 government support has been delayed, decreased, and/or failed to materialize. The highly vulnerable homeless populations continue to be more susceptible to contract Covid-19 due to their living conditions. Between January 2020 and April 2023, there have been 24,574 Covid cases among persons experiencing homelessness (PEH), with 380 Covid-19 related deaths. 4,008 PEH sought care at a hospital and 3,832 were admitted.<sup>18</sup>

In addition, as the demand for shelter beds is increasing, the capacity of each shelter is being assessed to ensure that people can be safely housed. Shelters have undergone “decompression” as determined to be needed to ensure that there is adequate, safe separation between residents and staff. This process has reduced capacity of existing shelters as demand is rising. As the economic hardships of the pandemic and global health crisis continue to challenge our region with a

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<sup>15</sup> Division of Tuberculosis Elimination, "How TB Spreads," Centers for Disease Control and Prevention, March 11, 2016, accessed September 16, 2020, <https://www.cdc.gov/tb/topic/basics/howtbspreads.htm>

<sup>16</sup> Los Angeles County Department of Public Health. November 15, 2022. LAC DPH Health Advisory: Increases of Flea-Borne Typhus. <http://publichealth.lacounty.gov/eprp/lahealth/alerts/LAHANTyphus111622.pdf>

<sup>17</sup> C. Y. Liu, S. J. Chai, and J. P. Watt, "Communicable Disease among People Experiencing Homelessness in California," *Epidemiology and Infection* 148 (2020), accessed September 10, 2020, doi:10.1017/s0950268820000722)

<sup>18</sup> Los Angeles County Department of Public Health. April 17, 2023. Summary Report on COVID-19 among People Experiencing Homelessness (PEH) in Los Angeles County. [SummaryReport\\_People\\_Experiencing\\_Homelessness.pdf](#) (lacounty.gov)

disproportionate impact on our most vulnerable, we continue to see an increase in the number of people experiencing homelessness.<sup>19</sup>

Communities are still being impacted by the COVID-19 pandemic however, beginning April 2023, reduced household income due to pandemic-related job loss, illness or death won't be grounds for deferring rent. Tenant advocates signal that, though as of May 2023 COVID-19 deaths and hospitalization rates have dropped<sup>20</sup>, many renters are still grappling with the pandemic's aftermath. Without renter protections, they fear that L.A. County could see a wave of evictions — this in a region that's already struggling to address a mounting homelessness crisis.<sup>21</sup>

## Substance Use and Mental Illness

Substance use and mental illness are two other major health issues plaguing the Los Angeles County homeless community. Substance use disproportionately impacts the homeless and is, in many cases, their primary reason for homelessness. A survey by the United States Conference of Mayors found that 68% of cities reported that substance abuse was the single largest cause of homelessness for single adults.<sup>22</sup> Los Angeles County Supervisor Kathryn Barger released the following statement regarding the 2022 Greater Los Angeles Homeless Count results provided by the Los Angeles Homeless Service Authority (LAHSA): “LAHSA's homelessness tally and finding that 39% of people experiencing homelessness reported experiencing serious mental illness or substance abuse are both guesstimates, at best. I think both of these numbers are much bigger than what's being reported. The California Policy Lab at UCLA, for example, found that the percentage of people experiencing mental health illness and substance abuse addiction is closer to 50%.”

Substance use can lead individuals to take part in risky behaviors that put them at risk for assault, contracting diseases, and premature death.<sup>8</sup> One study estimated one-third of homeless individuals in the United States name mental illness as the cause of homelessness.<sup>23</sup> Previous psychiatric hospitalizations can also be linked to unsanitary practices, with a recorded 28% of homeless individuals with a previous hospitalization reporting that they've eaten food from trashcans and a recorded 8% using food from the trash as a primary source of food.<sup>24</sup>

The cost of mental illness among the homeless is high, and as a result, a vicious cycle of hospital-to-street-to-jail-cell has been occurring in Los Angeles. In other words, patients are released from

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<sup>19</sup> Motion by Supervisors Kathryn Barger and Hilda L. Solis May 3, 2022. Implement the Blue-Ribbon Commission on Homelessness' Recommendations

<sup>20</sup> Los Angeles County Department of Public Health, Communications & Public Affairs. April 24, 2023. *LA County COVID-19 Data*. LA County COVID-19 Data - LA County Department of Public Health.

<sup>21</sup> Barajas, J. March 30, 2023. As Covid-19 Protections End, LA Renters and Landlords Brace for Possible Eviction Wave. LAist. <https://laist.com/news/housing-homelessness/los-angeles-covid-19-protections-expire-renters-landlords-possible-eviction-wave>

<sup>22</sup> National Coalition for the Homeless, 2020. *Substance Abuse and Homelessness*. [ebook] Washington, DC: National Coalition for the Homeless. Available at: <<https://www.nationalhomeless.org/factsheets/addiction.pdf>> [Accessed 16 September 2020].

<sup>23</sup> Julia Dickson-Gomez et al., “The Relationship between Housing Subsidies and Supportive Housing on Neighborhood Distress and Housing Satisfaction. Does Drug Use Make a Difference?” *Substance Abuse Treatment, Prevention, and Policy* 11

<sup>24</sup> C. Y. Liu, S. J. Chai, and J. P. Watt, "Communicable Disease among People Experiencing Homelessness in California," *Epidemiology and Infection* 148 (2020), accessed September 10, 2020, doi:10.1017/s0950268820000722)

psychiatric hospitals with nowhere to go, therefore returning to the streets of Los Angeles.<sup>25</sup> Without maintained treatment, the mentally ill relapse, and sometimes end up receiving treatment in prison. In fact, the decreased availability of psychiatric beds has been correlated with an increased prevalence of crime and arrest rates. The cost of treating mental illness in prisons is not cost-effective. This results in a high financial cost to Los Angeles County and further burdens the mentally ill with unchecked illness.

## How Homelessness Hurts Individuals

The United Nations recognized the right to "adequate housing" as a fundamental human right almost three decades ago.<sup>26</sup> When individuals lack a consistent and secure place to live and sleep, the effects on their health are detrimental and accumulative in nature. More than 80% of homeless people have at least one chronic medical issue, such as high blood pressure, heart disease, diabetes, and infectious diseases.<sup>27</sup> Over half of homeless individuals have a mental health condition such as schizophrenia, bipolar disorder, post-traumatic stress disorder, and others, and up to an estimated 60% have substance-use disorders. Without appropriate treatment and care, many of these individuals will succumb to their mental illness and addictions, leaving them vulnerable not only to a justice system that all too often criminalizes poverty, but also vulnerable to worsening mental states and early mortalities.<sup>28</sup>

Besides their health, PEH are constantly forced to worry about their environment and physical safety. In one study of homeless individuals, 32% of women, 27% of men, and 38% of transgender individuals reported physical or sexual assault in the previous year.<sup>29</sup> Among homeless women with mental illness, the lifetime risk of violent victimization is 97%.<sup>30</sup>

These constant comorbid burdens, stressors, and barriers to assistance shorten the lifespan of homeless individuals. Studies have shown that the average lifespan of unhoused people can be cut short by as much as 36 years, and the mortality rate can be four to nine times higher than the housed general population.<sup>31,32</sup> Further, a ten-year study in Boston found that homeless

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<sup>25</sup> E. Fuller Tory, Dr., "Homeless Mentally Ill Facts and Figures," Mental Illness Policy Org, January 23, 2019, accessed September 16, 2020, <https://mentalillnesspolicy.org/consequences/homeless-mentally-ill.html>

<sup>26</sup> Office of the United Nations High Commissioner for Human Rights, 2020. *The Right to Adequate Housing*. [online] Geneva: United Nations. Available at: [https://www.ohchr.org/Documents/Publications/FS21\\_rev\\_1\\_Housing\\_en.pdf](https://www.ohchr.org/Documents/Publications/FS21_rev_1_Housing_en.pdf)

<sup>27</sup> Valvassori P, Sar EM, Chipon-Scheopp N, Messer K. Chronic Disease Management in the Homeless. National Health Care Council for the Homeless website. <http://www.nhchc.org/wp-content/uploads/2014/06/chronic-disease-combo-hch-conf-es.pdf>. 2014. Accessed September 2020

<sup>28</sup> National Coalition for the Homeless, 2020. *Substance Abuse and Homelessness*. [ebook] Washington, DC: National Coalition for the Homeless. Available at: <https://www.nationalhomeless.org/factsheets/addiction.pdf> [Accessed 16 September 2020].

<sup>29</sup> National Sexual Violence Resource Center, 2020. *Housing, Homelessness, And Sexual Violence Statistics*. [PDF] National Sexual Violence Resource Center. Available at: [https://www.nsvrc.org/sites/default/files/NSAC11\\_Handouts/NSAC11\\_Handout\\_With\\_Statistics.pdf](https://www.nsvrc.org/sites/default/files/NSAC11_Handouts/NSAC11_Handout_With_Statistics.pdf) [Accessed 16 September 2020].

<sup>30</sup> End Sexual Violence. 2020. *Connecticut Alliance To End Sexual Violence*. [online] Available at: <https://endsexualviolencect.org/> [Accessed 16 September 2020]

<sup>31</sup> "Premature Mortality," Nhchc.org, October 2011, [PAGE], accessed September 16, 2020, <http://www.nhchc.org/wp-content/uploads/2011/10/Premature-Mortality.pdf>

<sup>32</sup> Cdc.gov. 2020. *Life Stages & Populations | Features | CDC*. [online] Available at: [https://www.cdc.gov/features/lifestages.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Ffeatures%2Fhomelessness%2Findex.html](https://www.cdc.gov/features/lifestages.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Ffeatures%2Fhomelessness%2Findex.html) [Accessed 16 September 2020].

individuals sleeping unsheltered have a ten-fold increased mortality rate compared to the general Massachusetts population.<sup>33</sup>

## How Homelessness Hurts Communities

Rising numbers of chronically homeless individuals affect our communities in a variety of ways, especially impacting publicly funded services. Homeless individuals use emergency rooms three times more and are hospitalized five times more than housed individuals. 80% of these visits are for an illness that could have been treated with regular primary care for far cheaper.<sup>34,35, 36</sup> Meanwhile, these frequent visits tie up and overwhelm local 911, Police, Fire, and EMS systems. Once hospitalized, often in County safety-net hospitals, the care rendered will go unreimbursed if the individual lacks health insurance, adding to the financial strain on already stretched safety-net systems. The economic impact on community property values, lost workforce productivity, and the increased burden on local jails—which must provide health services without the benefit of leveraging federal funds available when such services are provided in the community, cause the costs to continue to multiply.

## Recent Progress

While the challenges are considerable, our efforts within health services have led to some early successes. Studies nationally and locally, including a 2017 RAND Corporation study which looked at the Department of Health Services' Housing for Health division, have shown that homeless individuals within Los Angeles who frequently utilize acute care services require fewer services once housed.<sup>37</sup> Essentially, housing helps stabilize an individual's social environment and reduces daily stressors. This allows for more regular and appropriate engagement in life-sustaining choices such as visiting a primary care physician or mental health provider. In addition, our interim housing continuum under the Department of Health Services' Housing for Health division has provided a stable, clinically enriched environment where PEH with chronic disease can safely access the care and environment necessary to manage their health conditions.

However, Los Angeles lacks sufficient facilities which allow clinically complex individuals to come off the streets into interim housing and seek care when they are ready. Although some facilities are open extended hours, and even 24 hours a day, they often lack the clinical services necessary to help support a client's initial intensive needs. Facilities that do have the clinical capability to serve complex clients, keep normal business hours or have other restrictions that limit their accessibility. For example, clinics with bans on pets, a lack of secure storage space,

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<sup>33</sup> Roncarati, J., Baggett, T., O'Connell, J., Hwang, S., Cook, E., Krieger, N. and Sorensen, G., 2018. Mortality Among Unsheltered Homeless Adults in Boston, Massachusetts, 2000-2009. *JAMA Internal Medicine*, 178(9), p.1242.

<sup>34</sup> HEALTHCARE COST AND UTILIZATION PROJECT, 2020. *Characteristics Of Homeless Individuals Using Emergency Department Services In 2014*. [online] Rockville, MD: Agency for Healthcare Research and Quality. Available at: <<https://www.hcup-us.ahrq.gov/reports/statbriefs/sb229-Homeless-ED-Visits-2014.pdf>> [Accessed 16 September 2020].

<sup>35</sup> 2020. *Housing and The Role of Hospitals*. [ebook] American Hospital Association. Available at: [www.hpoe.org/Reports-HPOE/2017/housing-role-of-hospitals.pdf](http://www.hpoe.org/Reports-HPOE/2017/housing-role-of-hospitals.pdf) [Accessed 16 September 2020].

<sup>36</sup> Greendoors.org. 2020. *The Costs of Homelessness | Green Doors*. [online] Available at: <<https://www.greendoors.org/facts/cost.php>> [Accessed 16 September 2020].

<sup>37</sup> Hunter, Sarah B., Melody Harvey, Brian Briscoombe, and Matthew Cefalu, *Evaluation of Housing for Health Permanent Supportive Housing Program*. Santa Monica, CA: RAND Corporation, 2017. [https://www.rand.org/pubs/research\\_reports/RR1694.html](https://www.rand.org/pubs/research_reports/RR1694.html)



prohibition of tent or car habitation, and an absence of gender-mixed housing—allowing partners to stay together—hinder individuals from using clinic services.

Several new dedicated funding sources have been approved at the state and local levels to address the homeless crisis:

- Almost \$2 billion in funding by California’s Homeless Housing, Assistance and Prevention (HHAP) Grant Program, spread over four rounds
- \$1.2 billion local (City of Los Angeles) bond measure (Measure HHH) approved in November 2016, generated over ten years.
- County-wide Measure H, approved in March 2017, provides a 0.25 percent sales tax, generating \$355 million annually for ten years to fund homeless services and prevention.

These funding sources are available for projects. The Los Angeles County budget for the 2023-2024 fiscal year (FY) increased to \$43 billion. On February 7, 2023 (four weeks after declaring a local emergency on homelessness), the Board of Supervisors unanimously approved a \$609.7 million budget for the Los Angeles County Homeless Initiative for fiscal year 2023-24, the largest investment in any given year to date to prevent and address homelessness. This budget will help fund a heightened focus on three key missions for the County in collaboration with cities and other local partners:

- Reducing encampments to bring unsheltered people indoors
- Increasing interim and permanent housing placements
- Ramping up mental health and substance use disorder services for people experiencing homelessness

In addition to the \$609.7 million budget funded by 2023-24 Measure H and state Homeless Housing, Assistance and Prevention (HHAP) grants, the Board simultaneously approved an additional \$76.9 million to expand housing and services that the County provides in collaboration with local cities, as well as for innovative new programs. The FY 2023-24 Homeless Initiative Funding Recommendations approved by the Board do not encompass all the County’s investments to address and prevent homelessness but represents a significant portion.

Ensuring that current funding is being spent on programming with an evidence-based, researched, impact on decreasing the prevalence of homelessness is a paramount concern for Los Angeles County as a whole.

Most of the people experiencing homelessness that the homeless system helps house, stay housed. Eighty-eight percent of the people placed in permanent housing through the Los Angeles Homeless Services Authority (LAHSA) system in 2018 have not returned to homelessness, with similar results in 2021.<sup>38</sup> In FY 2021-2022, the rehousing system helped 15,733 people move into permanent housing.<sup>35</sup> And many more people occupied interim housing in FY 2021-2022: 29,180 people experiencing homelessness in LA County were sheltered, up from 26,750 the previous year, an 8% increase.<sup>35</sup> To reduce the risk of Covid-19 spread, providers and the county reduced the total bed capacity of the "A Bridge Home" program. As of April 2023, the total amount of “A

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<sup>38</sup> Los Angeles County Chief Executive Office, Homeless Initiative. September 2023. *Los Angeles County Homeless Initiative Impact Dashboard*. <https://homeless.lacounty.gov/impact-dashboard/>

Bridge Home” beds available is 1,570 with 1,444 enrolled clients.<sup>39</sup> The program is at 92% capacity. According to LAHSA’s 2021 Housing Inventory Count and Shelter Count, permanent housing slots throughout the Los Angeles region increased by 16% to 33,592 slots over three years.<sup>40</sup>

However, "even with the significant gains made in placing people into housing with services, it [increased housing] is not keeping pace with those Angelenos falling into homelessness." The number of homeless people in Los Angeles County continues to grow. Prior to the pandemic, "an average of 207 people exit homelessness every day—while 227 people become homeless." The Covid-19 pandemic and the end of Covid-19 government assistance, has the potential to turn what was already a major emergency into a catastrophe for Los Angeles County.

### **How Shelter and PSH Projects Address the Emergency**

Given the severity of the homelessness emergency facing Los Angeles County, the most immediate intervention necessary for the safety of homeless Angelenos, as well as Angelenos facing housing insecurity, is access to shelter. Not only will access to a shelter allow the homeless a chance to rejoin the general population but shelter also removes common risk factors. Shelters provide individuals with the resources necessary to maintain hygiene, helping to stop the spread of certain communicable diseases. Shelters often provide access to resources aimed at finding affordable housing options. Which may allow residents to find more permanent housing, thereby continuously freeing up space for new residents.

Today's shelters are generally free of the restrictions that so commonly stop the homeless from using interim housing services. Shelters are generally staffed around the clock by workers, many of whom have previously been homeless. Shelters generally provide meals, sleep areas, bathrooms with showers, transportation to appointments, counseling, and numerous other services and activities. Shelters immediately beneficially impact homelessness in the surrounding areas.

Some shelter projects provide substance use disorder treatment, including the use of Medication-Assisted Treatment (MAT) and the opioid reversal agent naloxone. Access to these services continues to be expanded. Services are not always co-located with housing, forcing individuals to choose between searching for housing and consistent treatment. Shelters that provide on-site substance use disorder treatment and counseling help prevent opioid overdoses and decrease deaths. These risks have a high probability of imminently occurring without the provision of shelters and services.

To meaningfully and sustainably intervene in public health crises negatively affecting the Los Angeles homeless population, new shelters that are open 24/7, with low entry barriers, are urgently required. The County is rapidly pursuing the construction of shelter facilities to provide service essential to public health, safety, and welfare to mitigate the emergency conditions outlined above.

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<sup>39</sup> Los Angeles Homeless Services Authority. April 2023. *ABH Public Dashboard: Adult*. <https://app.powerbi.com/view?r=eyJrIjoiMWMxMDYzNDIiOTliMy00M2UwLWE5ZTU0NGFhYjM0ZTE2ZDZjIiwidCI6IjBiYWU1NDliLTUyZDgtNGEzYiIhYTE5LWQ1MDY2MmIzMDg5NyIsImMiOiJZ9&pageName=ReportSectionf893b95985095e49b149>

<sup>40</sup> Los Angeles Homeless Services Authority. 2021. *LAHSA Releases 2021 Housing Inventory Count and Shelter Count Results*. <https://www.lahsa.org/news?article=849-lahsa-releases-2021-housing-inventory-count-and-shelter-count-results>.

Access to shelter and services is immediately necessary to minimize the spread of infectious diseases, thereby increasing the lifespan of residents, as well as increasing quality of life. Access to safe, sustainable shelter is a proven method for reducing the morbidities and mortalities associated with homelessness and is generally a more cost-effective form of intervention than seeking to treat the health issues caused by unchecked homelessness.

## Summary

According to the 2023 Greater Los Angeles Homeless Count, the County of Los Angeles had at the time of the count (January 2023) approximately 75,518 people experiencing homelessness countywide (a 9% increase from the previous year), including approximately 46,260 in the City of Los Angeles (a 10% increase from the previous year). While 2024 shows slight reductions in people experiencing homelessness, the emergency remains.

It has been estimated that if the inflow into homelessness stops, our existing rehousing system could end homelessness in Los Angeles County in three to four years.<sup>41</sup> During the crisis Los Angeles County has been housing the homeless population at record numbers.<sup>42</sup> Each Interim Shelter and supportive housing project for the foreseeable future is urgently needed to provide shelter to the many homeless people located in Los Angeles County. This homeless population lives in extreme and dangerous conditions that expose them to the elements as well as other health and safety issues associated with being unsheltered. Immediate action is needed to address this crisis.

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**HEIDI L. BEHFOROUZ, M.D.** Physician leader, consultant, and clinician, has focused her career on the health issues of vulnerable populations. She is currently Medical Director of Housing for Health at Los Angeles County Department of Health Services (LAC DHS) - the second largest safety net organization in United States. Here, she oversees the county's clinical initiatives to improve the health and wellbeing of the largest homeless population in the United States. In LA County, she also served as the Medical Director for the Care Connection Program, a primary care clinic-anchored complex care management program that connects community health workers to care management teams within the medical home. She is a board-certified internist who practices primary care at the STAR clinic in Skid Row, Los Angeles.

She is Founder and past Executive Director of Partners In Health's Prevention and Access to Care and Treatment (PACT) project in Boston, Massachusetts which employed community health workers (CHWs) to advocate for the health and wellbeing of inner city residents infected with or at risk for HIV and other chronic diseases. In the PACT model, CHWs provided home-based health promotion and harm reduction services and complemented the efforts of primary care

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<sup>41</sup> Los Angeles County Chief of Executive Office. January 23, 2023. Report Back on Proclamation of a Local Emergency for Homelessness in the County of Los Angeles. <https://file.lacounty.gov/SDSInter/bos/supdocs/177569.pdf>

<sup>42</sup> We have designed the crises: LA Homeless Services Director Resigns Isai Rocha April 25, 2022 ['We Have Designed the Crisis:' L.A. Homeless Services Director Resigns \(laweekly.com\)](https://www.laweekly.com/news/we-have-designed-the-crisis-la-homeless-services-director-resigns/)

providers to improve health literacy, medication adherence, self-management behaviors, and health care utilization patterns in the highest risk subset of patients with chronic disease. After one year, 70% of HIV/AIDS patients enrolled in PACT achieved clinically significant improvements in health status with a net 16% reduction in total Medicaid expenditures after two years of enrollment. This program was cited by AHRQ and HRSA as a best-practice complex care management intervention and has since been adapted for the care of patients with other chronic diseases (diabetes, mental illness, pulmonary disease) and psychosocial complexity. This model has also been successfully replicated in other settings, including New York City, California's Inland Empire, Miami, and Navajo nation. Dr. Behforouz continues to provide consultation in complex care management to accountable care organizations, managed care organizations, health departments, and community-based organizations around the country.

Dr. Behforouz is committed to the transformation of primary care to better serve the needs of the most vulnerable patients in our communities and has been privileged to champion the role of community health workers in effecting lasting change in our health care delivery system and health of our communities.

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## **Attachment B -- Historic Resource Impact Evaluation**



**Kaplan Chen Kaplan**

Architects & Planners

2526 Eighteenth Street

Santa Monica CA 90405

**MEMO**

April 30, 2024

To: Ms. Wendy Lockwood  
Sirius Environmental

From: Pam O'Connor  
Architectural Historian/Preservation Planner

Re: Historic Resource Evaluation Memo  
12135 Victory Boulevard, Los Angeles  
**APN: 2322-006-035**

**Summary**

Kaplan Chen Kaplan conducted a historic resource evaluation of the property at 12135 Victory Boulevard in the North Hollywood – Valley Village Community Plan Area of the City of Los Angeles. This study included review of the site and surroundings. Sources researched included review of building permit records, Los Angeles County Assessor records and SurveyLA historic resources survey reports. The data and property were analyzed and evaluated by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for Historic Preservation.

There is no evidence that the property at 12135 Victory Boulevard contributed to any broad pattern of history nor did it influence development of the North Hollywood area. There is no evidence that any historic persons, businesses, or events are associated with this property. The building is a vernacular commercial building with International Style influences. It is not an exceptional or excellent example of the International Style. not a good or excellent example of any architectural style. The property is not eligible for listing on the National Register of Historic Places, or the California Register of Historical Places or as a City of Los Angeles Historic-Cultural Monument.

Telephone 310.452.7505

Facsimile 310.452.1494



## Setting

The subject property is in the North Hollywood-Valley Village Community Plan Area of the City of Los Angeles. The property has a General Plan Land Use designation as Commercial with Zoning C2-1L. The subject property is located at 12135 Victory Boulevard between the Hollywood Freeway (CA-170) on the west and Laurel Canyon Boulevard on the east. Both Victory Boulevard and Laurel Canyon Boulevards are major arterial streets. The area contains commercial and retail buildings as well as large surface parking lots.



Location Map (ZIMAS, 2024)



Area Map (ZIMAS, 2024)



**Kaplan Chen Kaplan**  
Architects & Planners



Satellite view of Area (Google Earth, c2023)



Map showing parking lots in yellow (LA County Assessor, 2024)



Parcel Map (LA County Assessor)



Satellite view of north side of 12100 Block of Victory Boulevard (Google Earth, c2023)

## Development History and Building Description

The property is in Tract 15405 was subdivided in 1950 for a group of business owners, including Symonds-Burns Inc., Bank of America National Trust and Savings Association, J.J. Newberry Co., Geramon Investments Co., and Pacific Telephone and Telegraph Co. The 12100 block of Victory Boulevard began its development with a 159,000 square foot building and surface parking lot at the corner of Victory Boulevard and Laurel Canyon Boulevard which operated as a Sears department store constructed in 1951. To its west, four smaller parcels, including the subject property, were developed over the next decade. The subject parcel at 12135 Victory Boulevard was also developed in 1951; the other parcels to the west were developed in 1955, 1960 and 1961.



**Kaplan Chen Kaplan**  
Architects & Planners



12121 Victory Boulevard, parking lot for former Sears store



12121 Victory Boulevard, former Sears building and looking west  
Along Victory Boulevard



12135 Victory Boulevard (subject building)





12141 Victory Boulevard, property to the west of subject building



Looking west along 12100 block of Victory Boulevard from

The subject property is 8,700 square-feet with a two-story 14,200 square-foot building. The building is sited on most of the parcel to its west with a narrow driveway located along the east property line. At its north property line, it abuts a parcel that is a surface parking lot (not affiliated with the subject property).







12135 Victory Boulevard, south elevation

A building permit was applied for in January 1951 for a one-story “store building” of 50 feet by 142 feet. The owner was W. I. Hollingsworth and Company. There was no architect for the building; the engineer was Charles L. Webber. In April 1951 another permit was applied for to add a second floor to the buildings. Over the decades many building permits were taken out for tenant improvements for a variety of small businesses and numerous permits for signs. A review of permits showed that the businesses included the typical range of neighborhood retail and local services. In 2010 a permit was taken out to change the first floor of the building from retail to a pool hall.

The building is rectangular in plan with a flat roof. It is stucco clad. There are aluminum framed glass storefront windows on the first floor which are currently covered on the inside by photographic images to obscure views to the inside pool hall. One grouping is of three windows of equal size and to their west are three windows, two of equal size and one narrower window. An aluminum framed glass entry door is part of the west grouping. There is a single aluminum frame glass door at the far west end of the first floor.

There are three windows organized along the second story of the building. Each has three parts: a center plate glass window flanked on each side by a window with four horizontal panes. The west elevation abuts the adjacent building. The east elevation



faces a narrow parking lane. The east elevation consists of ten windows along the second story and ten solid bays (no fenestration) separated by piers arranged along the building's side.



12135 Victory Boulevard, south and east elevations

### Evaluation of Property for Historic Significance

SurveyLA conducted a *Historic Resources Survey Report North Hollywood-Valley Village Community Plan Area* that identified eligible historic residential and commercial properties. The subject property was not identified as an eligible historic resource in the SurveyLA survey evaluation either as an individual historic resource or as a contributing building to an eligible historic district.

There is no evidence that any historic persons, businesses, or events are associated with the property at 12135 Victory Boulevard. The property is not associated with the early history of the San Fernando Valley as Tract 15405 was subdivided in developed in the mid-20<sup>th</sup> Century. The property is typical of mid-century commercial development along a commercial boulevard.

The building is a modest vernacular commercial building with International Style influences. The building is not an excellent or exceptional example of the International Style. The building is not the work of a master architect or builder. The building materials and construction techniques are unremarkable and are not the work of a master craftsman.





Ms. Wendy Lockwood  
Sirius Environmental  
12135 Victory Boulevard, Los Angeles  
Historic Resource Evaluation Memo  
April 30, 2024  
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The property at 12135 Victory Boulevard does not meet the criteria for eligibility as a historic resource. There is no eligible historic district that includes the subject property. The building is not eligible for inclusion on the National Register of Historic Places, the California Register of Historical Resources or as City of Los Angeles Historic-Cultural Monuments either as an individual resource or as a contributing building to an eligible historic district.



**Kaplan Chen Kaplan**  
Architects & Planners

Ms. Wendy Lockwood  
Sirius Environmental  
12135 Victory Boulevard, Los Angeles  
Historic Resource Evaluation Memo  
April 30, 2024  
Page 9

## References

City of Los Angeles Building Permits

Los Angeles County Assessor Database

Los Angeles County Public Works, Land Records Information

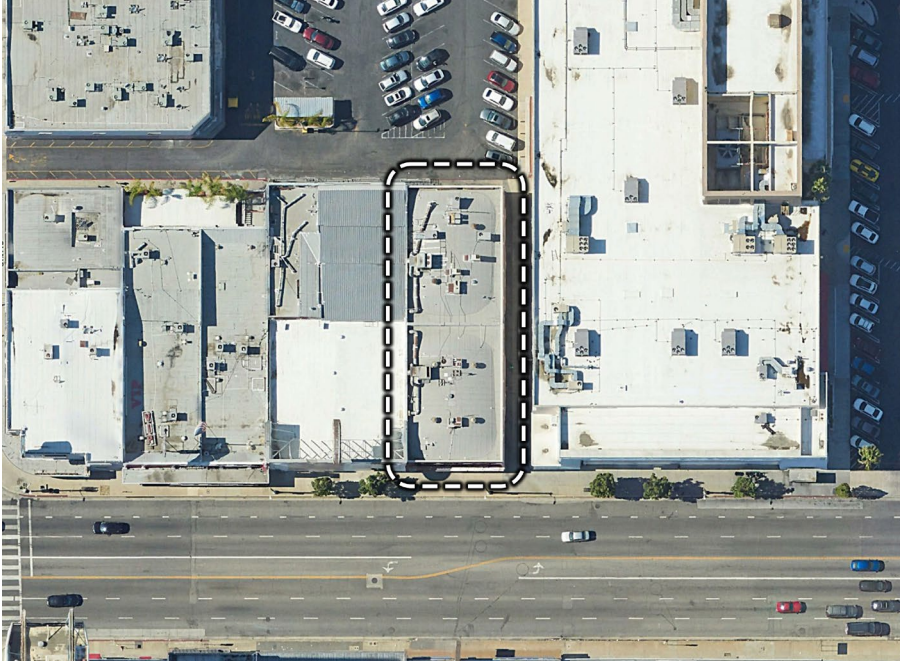
SurveyLA , *North Hollywood – Valley Village Historic Resources Survey Reports*,  
2013.

<https://www.planning.lacity.org/preservation-design/survey-la-results-north-hollywood-valley-village>

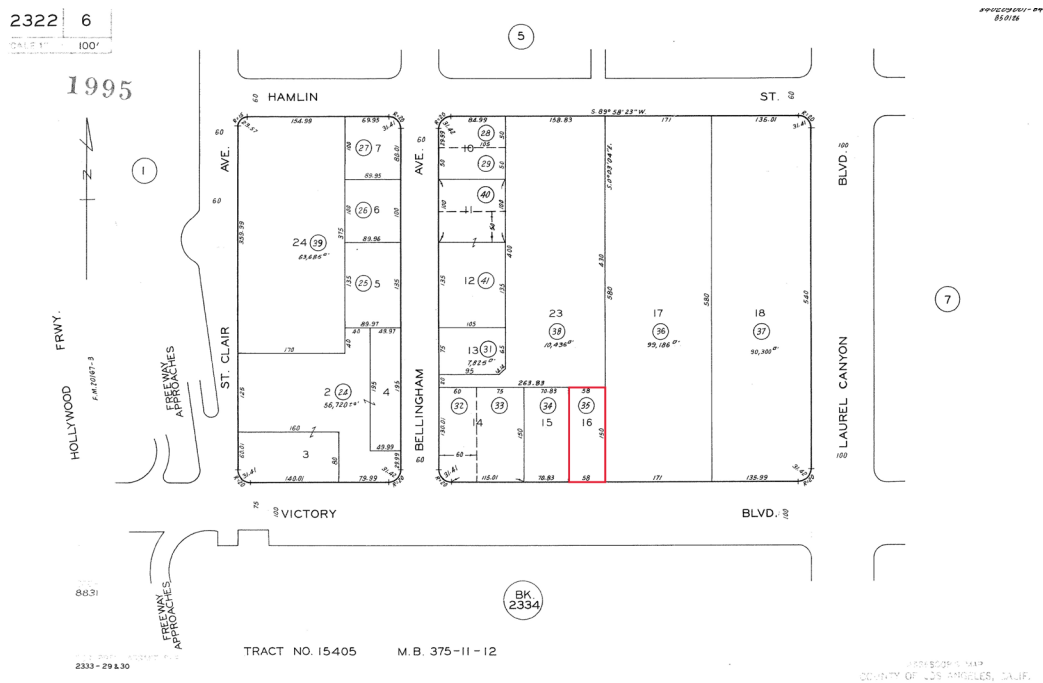


**Kaplan Chen Kaplan**  
Architects & Planners

## Maps



Aerial view



Los Angeles County Assessor Parcel Map



**Kaplan Chen Kaplan**  
Architects & Planners

375-11  
Sheet 1 of 2 Sheets.

## TRACT No 15405 IN THE CITY OF LOS ANGELES

JUNE 1940 SCALE 1"=80' JOHN W. BATTY SURVEYING, INC.  
BRING A SUBDIVISION OF A PORTION OF LOT 90 PROPERTY OF THE  
LANKERSHIM RANCH LAND & WATER CO.  
AS PER MAP RECORDED IN BOOK 31, PAGES 39 TO 44 INCLUSIVE OF  
MISCELLANEOUS RECORDS OF LOS ANGELES COUNTY, CALIFORNIA.  
~ BASIS OF BEARINGS ~  
THE BEARING S 89° 38' 36" W OF THE SOUTHERLY LINE OF TRACT No 12523  
AS SHOWN ON MAP OF TRACT No 12523 AS RECORDED IN BOOK 293 PAGES 45 TO 46  
RECORDS OF LOS ANGELES COUNTY WAS USED AS THE BASIS OF BEARINGS  
SHOWN ON THIS MAP.

I, John W. Batty hereby certify that I am a Licensed Surveyor  
of the State of California, and that this map consisting of 2  
sheets correctly represents a survey made under my supervision  
May 1940 and that the survey is true and complete as  
shown, and that all monuments shown hereon actually exist, and  
that their position and character are correctly shown, and that said  
monuments are sufficient to enable the survey to be retraced.

RECORDED  
May 3, 1940  
18-4788  
IN BOOK 375  
BY REC'D  
JUN 3 1940  
CLERK  
JAMES B. BATTY  
COUNTY CLERK  
ST. 100

STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES  
On this 6 day of March 1940 before me, John W. Batty  
a Notary Public in and for said County, personally appeared  
Robert C. Symonds  
known to me to be the President, and Gladys E. Symonds  
known to me to be the Assistant Secretary of Symonds-Burns Incorporated,  
the corporation that executed the within instrument on behalf of the corporation  
therein named, and acknowledged that such corporation executed the same.

(Signed) John W. Batty  
My Commission Expires March 24, 1945

STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES  
On this 22 day of March 1950 before me, Hazel T. Brown a Notary  
Public in and for said County, personally appeared W. H. McKim known to me to be the  
known to me to be the Vice President, and W. H. McKim known to me to be the  
known to me to be the Secretary of SECURITY FIRST NATIONAL BANK OF LOS ANGELES  
the corporation that executed the within instrument  
and known to me to be the persons who executed the within instrument on behalf of the  
corporation therein named, and acknowledged that such corporation executed the same, as trustee.

(Signed) Hazel T. Brown  
MY COMMISSION EXPIRES

STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES  
On this 16 day of December 1949 before me, Evelyn Brown a Notary  
Public in and for said County, personally appeared R. A. Wright  
known to me to be the Trust Officer, and R. A. Wright known to me to be the  
known to me to be the Assistant Secretary of SECURITY FIRST NATIONAL BANK OF LOS ANGELES  
the corporation that executed the within instrument  
and known to me to be the persons who executed the within instrument on behalf of the  
corporation therein named, and acknowledged that such Corporation executed the same, as trustee.

(Signed) Evelyn Brown  
MY COMMISSION EXPIRES FEB 2, 1952

STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES  
On this 17 day of January 1950 before me, Charles L. Papp a Notary  
Public in and for said County, personally appeared J. E. Hayward  
known to me to be the Trust Officer, and J. E. Hayward known to me to be the  
known to me to be the Assistant Secretary of SECURITY FIRST NATIONAL BANK OF LOS ANGELES  
the corporation that executed the within instrument  
and known to me to be the persons who executed the within instrument on behalf of the  
corporation therein named, and acknowledged that such Corporation executed the same.

(Signed) Charles L. Papp  
MY COMMISSION EXPIRES DEC. 4, 1951

STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES  
On this 16 day of December 1949 before me, Donald D. Johnson a Notary  
Public in and for said County, personally appeared J. E. Hayward  
known to me to be the Trust Officer, and J. E. Hayward known to me to be the  
known to me to be the Assistant Secretary of SECURITY FIRST NATIONAL BANK OF LOS ANGELES  
the corporation that executed the within instrument  
and known to me to be the persons who executed the within instrument on behalf of the  
corporation therein named, and acknowledged that such Corporation executed the same.

(Signed) Donald D. Johnson  
MY COMMISSION EXPIRES June 15, 1952

STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES  
On this 22 day of March AD 1950 before me, John W. Wellcott a Notary  
Public in and for said County, and STATE PERSONALLY APPEARED J. N. PUGH  
known to me to be the VICE PRESIDENT AND ALLY APPEARED J. N. PUGH  
known to me to be the GENERAL MANAGER, AND J. N. PUGH  
known to me to be the ASSISTANT SECRETARY OF THE PACIFIC  
TELEPHONE AND TELEGRAPH COMPANY, the Corporation that executed the within instrument  
and known to me to be the persons who executed the within instrument on behalf of the  
corporation therein named, and acknowledged that such Corporation executed the same.

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND AND AFFIRMED MY  
OFFICIAL SEAL THE DAY AND YEAR IN THIS CERTIFICATE FIRST ABOVE WRITTEN.

I HEREBY CERTIFY THAT ALL SPECIAL ASSESSMENTS OF WHICH  
I AM IN CHARGE, TO WHICH THE LAND INCLUDED IN THE WITHIN  
SUBDIVISION OR ANY PART THEREOF IS SUBJECT AND WHICH  
MAY BE PAID IN FULL, HAVE BEEN PAID BY THE  
PROPERTY OWNERS OF THE WITHIN  
TRACT No 15405, 1950 Deputy John W. Wellcott  
Date March 13, 1950 Deputy John W. Wellcott

RECORD PUBLIC IN AND FOR SAID COUNTY AND STATE  
MY COMMISSION EXPIRES JULY - 9, 1953

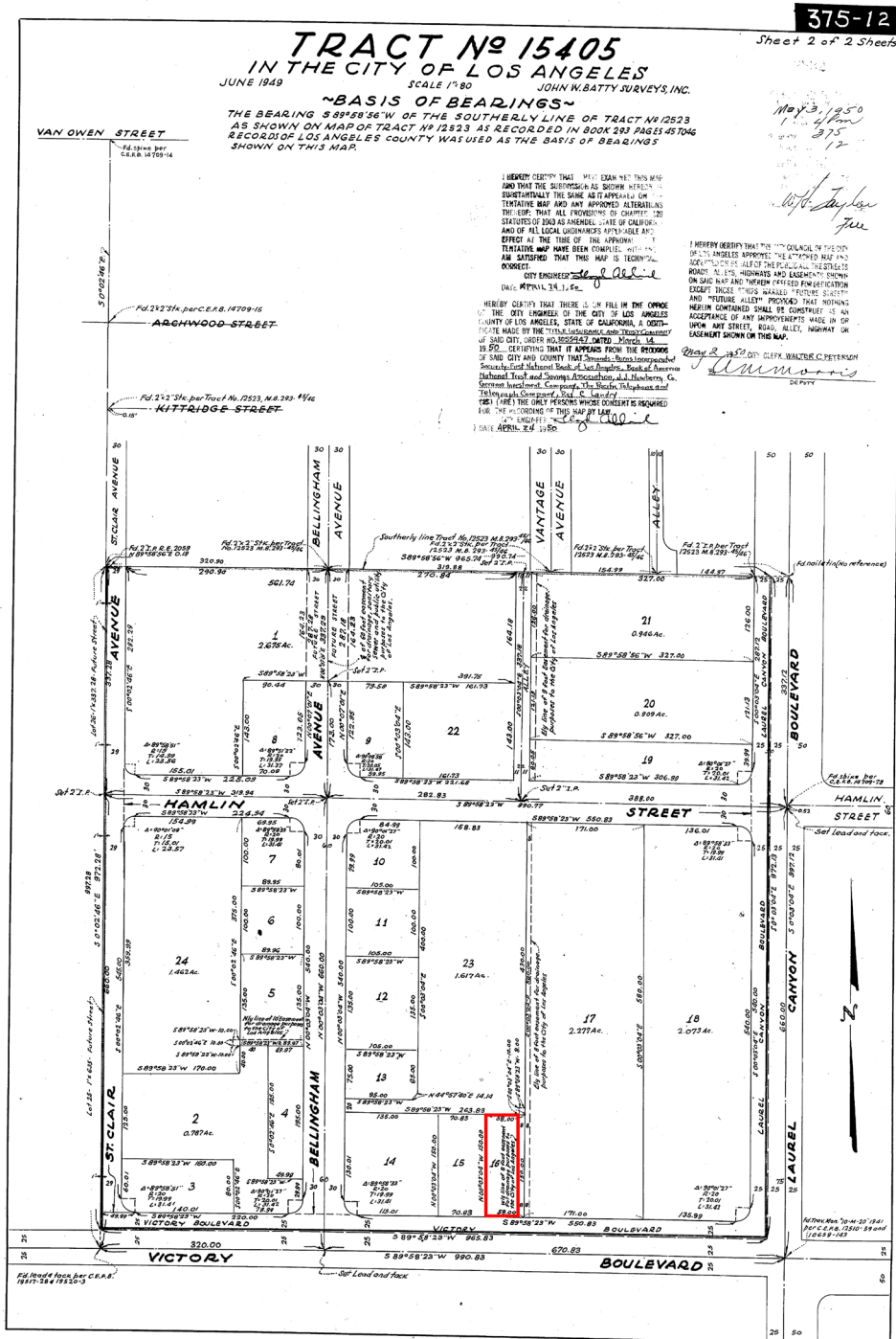
THE PACIFIC TELEPHONE AND TELEGRAPH COMPANY, A CORPORATION  
SUCCESSOR IN INTEREST TO THE SOUTHERN CALIFORNIA TELEPHONE COMPANY, A CORPORATION,  
AS THE WORKS OF AN EASEMENT RECORDED IN BOOK 2182A, AT PAGE 108  
OF OFFICIAL RECORDS OF THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, DOES  
HEREBY CONSENT TO THE PREPARATION AND RECORDATION OF THE ANNEXED MAP AND  
SUBDIVISION AND TO THE DEDICATION THEREOF, SUBJECT TO THE ABOVE SAID  
EASEMENT.

BY John W. Wellcott  
VICE PRESIDENT AND GENERAL MANAGER  
BY John W. Wellcott  
ASSISTANT SECRETARY

State of California } ss  
County of Los Angeles }  
On this 22 day of April 1950 before me, John W. Wellcott a Notary Public in and for  
said County and State, personally appeared Rex C. Landry  
known to me to be the person whose name is subscribed  
to the within instrument and acknowledged to me that  
he executed the same.

RECORDED  
APR 24 1950  
IN BOOK 375  
BY REC'D  
JUN 3 1940  
CLERK  
JAMES B. BATTY  
COUNTY CLERK  
ST. 100





Tract Map 2 of 2





Ms. Wendy Lockwood  
Sirius Environmental  
12135 Victory Boulevard, Los Angeles  
Historic Resource Evaluation Memo  
April 30, 2024  
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## Permits

**1** ELECT. DIV.  
APPROVED  
ELVIN E. YOKUM  
ELECTRICAL INSPECTOR

**APPLICATION TO  
ERECT A NEW BUILDING  
AND FOR A  
Certificate of Occupancy**

CITY OF LOS ANGELES  
DEPARTMENT  
OF  
BUILDING AND SAFETY  
BUILDING DIVISION

Lot No. 16

Tract. 15405 IN CITY OF LOS ANGELES

Location of Building 12135 VICTORY BLVD. (House Number and Street)

Between what cross streets? BELLINGHAM & LAUREL CAN. BLVD.

USE INK OR INDELEBIL PENCIL

1. Purpose of building STORE BLDG. Families Rooms

2. Owner H. I. HOKINGSWORTH & CO. Phone MI-3411

3. Owner's Address 606 SO. HILL ST. L.A. 10

4. Certificated Architect State License No. Phone

5. Licensed Engineer C. L. WEBBER State License No. 4017 Phone TR-6585

6. Contractor NOT LET State License No. Phone

7. Contractor's Address

8. VALUATION OF PROPOSED WORK (including all labor and material and all permanent lighting, heating, ventilating, water supply, plumbing, fire sprinkler, electrical wiring and elevator equipment, installed or to be installed) 28,000.00

9. State how many buildings NOW on lot and give use of each. NONE

10. Size of new building 50' x 142' No. Stories 1 Height to highest point 2.3 Size lot 50' x 142'

11. Material Exterior Walls MASONRY Type of Roofing WOOD TRUSS

For Accessory Buildings and similar structures

(a) Footing: Width Depth in Ground Width of Wall

(b) Size of Studs Material of Floor

(c) Size of Floor Joists Size of Rafters

I hereby certify that to the best of my knowledge and belief the above application is correct and that this building or construction work will comply with all laws, and that in the doing of the work authorized thereby I will not employ any person in violation of the Labor Code of the State of California relating to Workmen's Compensation Insurance.

Sign here Webber & Co.  
District Office VAN NUYS R. N. Heath

**FOR DEPARTMENT USE ONLY**

PLAN CHECKING				Investigation Fee \$	
Fee	TYPE	Maximum No. Occupants	State License	State License	State License
40.00	W-B	10	State License	State License	State License
64	GROUP	Manley	C-2	2	74.50
72.5	Full Plans Fee	Manley	72.5	1	10.00
100.00	Full Plans Fee	Manley	100.00	1	10.00

DO NOT WRITE BELOW THIS LINE

TYPE OF RECEIPT	DATE ISSUED	TRACER NO. (M)	RECEIPT NO.	CODE	FEE PAID
Plan Checking	DEC 21 1951		1414624		
Supplemental Plan Checking					
Building Permit	JAN 11 1952		LA 2807		



Kaplan Chen Kaplan  
Architects & Planners



**ELECT. DIV.**  
3  
ELVIN E. YOKUM  
ELECTRICAL INSPECTOR

**APPLICATION TO  
ALTER, REPAIR OR DEMOLISH  
AND FOR A  
Certificate of Occupancy**

Form 3-1-1965-0-1  
CITY OF LOS ANGELES  
DEPARTMENT  
OF  
BUILDING AND SAFETY  
BUILDING DIVISION

Lot No. 16  
Tract 15405  
Location of Building 12135 VICTORY BLVD  
(House Number and Street)  
Between what cross streets LAUREL CANYON & DELINGHAM (PLATA PLACE)  
USE INK OR INDELIBLE PENCIL  
1. Present use of building STORES Families --- Rooms ---  
(Store, Dwelling, Apartment House, Hotel or other purpose) PERMIT # 2507 J  
2. State how long building has been used for present occupancy UNDER CONSTRUCTION  
3. Use of building AFTER alteration or moving STORES Families --- Rooms ---  
4. Owner W. I. HOLLINGSWORTH Phone ML 3111  
(Print Name)  
5. Owner's Address 600 S. HILL ST. P. O. LA  
6. Certified Architect --- State License No. --- Phone ---  
7. Licensed Engineer CHAS. L. WENNER State License No. 4017 Phone TE 6595  
8. Contractor NOT LET State License No. --- Phone ---  
9. Contractor's Address ---  
10. VALUATION OF PROPOSED WORK (Including all labor and material and all permanent fixtures heating, ventilating, water supply, plumbing, fire protection, electrical wiring and fixtures) \$20,000.00  
11. State how many buildings NOW 1 STORE BLDG  
on lot and give use of each. (Store, Dwelling, Apartment House, Hotel or other purpose)  
12. Size of existing building 50 x 141 Number of stories high 1 Height to highest point 25'  
13. Material Exterior Walls MASONRY Exterior framework CONC. & WOOD  
(Wood, Steel or Masonry) (Wood or Steel)  
14. Describe briefly all proposed construction and work:  
PUT IN SECOND FLOOR IN LOCATION PROVIDED FOR SAME IN ORIGINAL SET OF PLANS

**NEW CONSTRUCTION**  
15. Size of Addition x Size of Lot x Number of Stories when complete ---  
16. Footing: Width --- Depth in Ground --- Width of Wall --- Size of Floor Joists x  
17. Size of Studs x Material of Floor --- Size of Rafters x Type of Roofing ---

I hereby certify that to the best of my knowledge and belief the above application is correct and that this building or construction work will comply with all laws, and that in the doing of the work authorized thereby I will not employ any person in violation of the Labor Code of the State of California relating to Workmen's Compensation Insurance.

DISTRICT OFFICE VAN NUYS DISTRICT Sign here WENNER & CO. (Owner or Authorized Agent)  
By Russell L. Davis

**FOR DEPARTMENT USE ONLY**

PLAN CHECKING Date <u>APR - 9 54</u> Receipt No. <u>LA 4616</u> Evaluation <u>\$20,000</u> Fee Paid <u>700</u>		REINFORCED CONCRETE Bldg. Comment Type of Reinforcing Steel	FEES Bldg. Per. Cert. of Occupancy Total <u>63.00</u>
TYPE GROUP FEE No. <u>6529</u>	Plans and Specifications checked Corrected Permit No. <u>---</u> Construction verified Permit No. <u>---</u> Plans Per Plans No. <u>---</u> Plan with <u>---</u>	Spec. No. Comments <u>---</u> Zone <u>C-2</u> Per. No. <u>2</u> Spec. No. <u>---</u> Application checked and approved Construction inspected Inspection No. <u>---</u> Violation No. <u>---</u>	Per. No. <u>---</u> Spec. No. <u>---</u> Per. No. <u>---</u> Spec. No. <u>---</u> Per. No. <u>---</u> Spec. No. <u>---</u>

P. Davis, Engr. on East P.L.



**Kaplan Chen Kaplan**

Architects & Planners  
2526 Eighteenth Street  
Santa Monica CA 90405

**Kaplan Chen Kaplan  
Historic Preservation**

Kaplan Chen Kaplan is an award-winning architecture and planning firm with a specialty in historic preservation. Historic resources are touchstones to the past that tell the stories of our diverse cultures. Kaplan Chen Kaplan believes that a thoughtful and balanced approach to historic preservation shapes the best designs and enhances communities.

For over 20 years KCK has been providing services ranging from identifying historic resources for planning and environmental review to preserving and rehabilitating historic resources to ensure their future as useful, sustainable buildings and places.

Historic preservation planning services include historic research and resource assessments, including CEQA level reports for environmental review, on a wide range of property types. Other services include development of historic contexts, HABS documentation, preparation of landmark designation nominations for local, state and federal levels, Mills Act and Federal Tax Act applications, master planning of historic resources, coordination with governmental agencies and reviews including Section 106 compliance.

Architectural services include rehabilitation and adaptive reuse of historic resources. development of concept documents for approvals and fundraising efforts, architectural design and construction documents, specifications for treatment of historic structures and materials, as well as comprehensive construction phase services. We utilize the Secretary of Interior's Standards for Treatment of Historic Structures and State Historical Building Code to assist in analyzing and preserving original historic design within a safe environment. For construction projects we meet with architects, engineers, conservators and other consultants to develop an overall preservation strategy leading to detailed specifications. We meet frequently with review and plan-checking agencies as well as the State Historic Building and Safety Board. Our extensive experience with historic construction monitoring helps us anticipate and minimize the impact of unknowns

Pam O'Connor and David Kaplan have worked together since 1995 on historic preservation issues, originally with Dr. Knox Mellon, former California's State Historic Preservation Officer. David Kaplan, licensed Architect, studied Architecture at University of Pennsylvania and received his graduate degree from UCLA. Pam O'Connor, planner and architectural historian, holds a Master of Science degree in Historic Preservation Planning from Eastern Michigan University.

Kaplan Chen Kaplan meets the Secretary of the Interior's Qualifications for Historic Architect and Architectural Historian. Kaplan Chen Kaplan is identified as qualified for historic architecture and architectural history by the California Historical Resources Information System (CHRIS) and as qualified for CEQA level historic resource assessments in the City of Los Angeles.

Telephone 310.452.7505

Facsimile 310.452.1494

## **Selected Architectural Projects**

*Greystone Mansion (NRHP)*, Kitchen, HVAC, ADA and Library Restoration, City of Beverly Hills, 2010-2020

*Fairfax HS Arts Gallery Project*, Historic Resource Impacts Evaluation, 201

*Fire Station 15 Relocation and Adaptive Re-Use*, USC School of Cinema Arts, 2014-2016

*Biscuit Lofts* (Nabisco Building) Landmark & Mills Act, Maintenance Plan 2007-2020 LAUSD Fort McArthur Naval Station Buildings, Assessment, Relocation & Rehabilitation, 2010-2016, Documentation & Monitor 2013-2014

*El Pueblo Siqueiros Mural & Interpretive Center*, Historic Architect. 2010–2013

*El Palacio & Lotus Apartments*, West Hollywood, Mills Act Maintenance Plan update, 2009

*Chinese American Museum*, Condition Assessment Report, Los Angeles, 2005

*LAUSD Armory - Annenberg Science Center*, CEQA Monitor, Historic Architect, 2000–2005

*LAUSD Ambassador Hotel*, Historic Documentation, Supplemental EIR & Monitor, 2006-2009

*Los Angeles City Hall Seismic Rehabilitation*, Historic CEQA Monitor, 1997-2001, and Historic Architect, Project Restore, Council Chambers & Furniture, 2001

*University of California Los Angeles (UCLA)* Historic Buildings, Historic Architect, Historic Documentation, Construction Monitoring, Seismic Repair: Powell Library, Kerckhoff Hall, Royce Hall, Haines Hall, Kinsey Hall, Men's Gym, Kaufman Hall (Dance), Mira Hershey Hall, Geffen Playhouse, Chancellor's Residence, Clark Library, 1995-2007

*University of Southern California*, Historic Buildings, Historic Architect, Seismic Repair: Doheny Memorial Library, Student Union, Mudd Hall, Kerckhoff House, Cockins House, Town & Gown, Physical Education, Business Administration, North Science, Hancock Hall, and Alumni House (Relocation) 1995-2019

## **Selected Historic Resource Assessment Projects**

*Institutional facility*, McLaren Hall, El Monte, Historic Resource Assessment, County of Los Angeles, 2020

*Residence*, 1711 Tropical Avenue, Beverly Hills, Historic Resource Assessment and Secretary of Interior's Compliance Evaluation, 2020

*Garden apartment complex*, Dorset Village, Los Angeles, Historic Resource Assessment, 2020

*Mixed use building*, Jennie C. Brayton Building, 5119 Eagle Rock Blvd, Los Angeles, Historic Resource Assessment/Landmark Nomination, 2020

*College Campus*, Los Angeles Trade Technical College, Los Angeles, Auditorium Building and Campus, Historic Resource Assessment, 2019

*Car wash*, 7617 Santa Monica Blvd, West Hollywood, Historic Resource Assessment, 2018

*Office building*, 6464 Canoga Avenue, Los Angeles, Historic Resource Assessment, 2018

*Historic Context*, Cathedral City Historic Context and Resource Report, 2017

*Residence*, 11100 Chalon Road, Los Angeles, Historic Resource Assessment, 2017

*Motel*, 15485 Ventura Blvd, Los Angeles, Historic Resource Assessment, 2018

*Business district*, Swarthmore Avenue Historic Resource Assessment and HABS documentation, Pacific Palisades, 2016

*Airport*, Burbank Bob Hope Airport Historic Resource Evaluations, Burbank, 2014

Historic Resource Assessments for CEQA review, City of Los Angeles, approximately 40 properties

Historic Resource Assessments for West Hollywood properties, approximately 50 properties



**Kaplan Chen Kaplan**

Architects & Planners



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2526 Eighteenth Street  
Santa Monica CA 90405

**David Kaplan**

**Principal Historic Architect**

David Kaplan is a registered architect with 30 years of experience working on historic preservation in Southern California. He brings a wide range of experience working in all phases of historic preservation including evaluations, assessments, documentation, and analysis of potential project impacts through construction monitoring. His knowledge of historic properties is furthered by his firm's own design and construction documents for historic projects. Mr. Kaplan meets the Secretary of the Interior's Qualification Standards for Historic Architecture and Architectural History. His work includes: CEQA level Historic Resource Assessments; Secretary of Interior's Standards compliance; HABS documentation, Mills Act submittals and local, state and federal landmark nominations.

**Selected Projects**

Greystone Mansion (NRHP), Kitchen, HVAC, ADA and Library Restoration, City of Beverly Hills, 2010-2020  
HRA for CEQA review, City of Los Angeles, approximately 40 properties 2016-2020  
HRA for West Hollywood properties, approximately 30 properties, 2016-2019  
Jennie C. Brayton Building, 5119 Eagle Rock Blvd, Los Angeles, Historic Resource Assessment/Landmark Nomination, 2020  
Residence, Venice Canal District, Historic Resource Assessment, 2020  
MLK Jr. Medical Center, CEQA Cultural Resource Assessment & Monitor, 2015-2020  
Fairfax HS Arts Gallery Project, Historic Resource Impacts Evaluation, 2016  
7617 Santa Monica Boulevard Carwash – EIR Cultural Resources Review, 2018  
Fire Station 15 Relocation and Adaptive Re-Use, USC School of Cinema Arts, 2014-2016  
Biscuit Lofts (Nabisco Building) Landmark & Mills Act, Maintenance Plan 2007-2020  
LAUSD Fort McArthur Naval Station Buildings, Assessment, Relocation & Rehabilitation, 2010-2016  
Sixth & Lucas Adaptive Re-use (1926, 8 story) Cultural Resource Assessment, Historic Documentation & Monitor 2013-2014  
El Pueblo Siqueiros Mural & Interpretive Center, Historic Architect. 2010-2013  
El Palacio & Lotus Apartments, West Hollywood, Mills Act Maintenance Plan, 2009  
Chinese American Museum, Condition Assessment Report, Los Angeles, 2005  
LAUSD Armory - Annenberg Science Center, CEQA Monitor, Historic Architect, 2000-2005  
LAUSD Ambassador Hotel, CEQA Historic Documentation, Supplemental EIR & Mitigation Monitor, 2006-2009  
Los Angeles City Hall Seismic Rehabilitation, Historic CEQA Monitor, 1997-2001, and Historic Architect, Project Restore, Council Chambers & Furniture, 2001  
Celes King III Swimming pool, HABS Drawings  
Isadore House HABS Drawings and Condition Assessment

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University of California Los Angeles (UCLA) Historic Buildings, Historic Architect, Historic Documentation, Construction Monitoring, Seismic Repair: Powell Library, Kerckhoff Hall, Royce Hall, Haines Hall, Kinsey Hall, Men's Gym, Kaufman Hall (Dance), Mira Hershey Hall, Geffen Playhouse, Chancellor's Residence, Clark Library, 1995-2007  
University of Southern California, Historic Buildings, Historic Architect, Seismic Repair: Doheny Memorial Library, Student Union, Mudd Hall, Kerckhoff House, Cockins House, Town & Gown, Physical Education, Business Administration, North Science, Hancock Hall, and Alumni House (Relocation) 1995-2019

### Awards

California Preservation Foundation, USC Historic Resources Restoration & Maintenance, 2017  
Los Angeles Conservancy, American Tropical, Presidents Award, 2013  
California Preservation Foundation, UCLA Kaufman Hall Rehabilitation, 2007  
Los Angeles Conservancy, Wallis Annenberg Bldg. for Science (Armory), Honor Award, 2006  
Los Angeles Conservancy, Geffen Playhouse Rehabilitation, Honor Award, 2006  
Los Angeles Conservancy, USC Mudd Hall Seismic Upgrade, Honor Award, 2004  
California Preservation Foundation, USC Doheny Library Seismic Renovation, 2002  
Governor's Award for Historic Preservation, Powell Library Ceiling Restoration, UCLA, 1997

### Additional Qualifications and Experience

NPS Qualifications: Historic Architecture, Architecture History  
CHRIS - Historic Architect & Architectural History  
Registered Architect, State of California C12875, LEED AP

Kaplan Chen Kaplan, Santa Monica, California, Principal, 1987 to present  
Knox Mellon and Associates, Riverside, California, Consultant, 1994 - 2000  
Moore Ruble Yudell Architects and Planners, Santa Monica, Associate, 1986 - 1993  
Urban Innovations Group, Los Angeles, California, Designer, 1977 - 1980

### Education

University of California, Los Angeles, School of Architecture and Urban Planning,  
Master of Architecture, 1979  
University of Pennsylvania, Philadelphia, Pennsylvania  
Bachelor of Arts in Design of the Environment, honors major, cum laude, 1975





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**Pam O'Connor**

**Preservation Planner and Architectural Historian**

Pam O'Connor is a preservation planner and architectural historian with 30 years of experience working in Southern California. She brings a multi-disciplinary approach with experience in historic preservation planning, cultural geography, and architectural history as well as experience in planning policy and municipal governance to her work. Ms. O'Connor meets the Secretary of the Interior's Qualification Standards for Architectural History. Her work includes: CEQA level Historic Resource Assessments; development of Historic Context Reports; Secretary of Interior's Standards compliance; and local, state and federal landmark nominations.

**Selected Consulting Projects:**

*Institutional facility*, McLaren Hall, El Monte, Historic Resource Assessment, County of Los Angeles, 2020  
*Residence*, 1711 Tropical Avenue, Beverly Hills, Historic Resource Assessment and Secretary of Interior's Compliance Evaluation, 2020  
*Garden apartment complex*, Dorset Village, Los Angeles, Historic Resource Assessment, 2020  
*Residence*, 411 Carroll Canal, Venice Canal District, Historic Resource Assessment, 2020  
*Mixed use building*, Jennie C. Brayton Building, 5119 Eagle Rock Blvd, Los Angeles, Historic Resource Assessment/Landmark Nomination, 2020  
*College Campus*, Los Angeles Trade Technical College, Los Angeles, Auditorium Building and Campus, Historic Resource Assessment, 2019  
*Car wash*, 7617 Santa Monica Blvd, West Hollywood, Historic Resource Assessment, 2018  
*Office building*, 6464 Canoga Avenue, Woodland Hills, Los Angeles, Historic Resource Assessment, 2018  
*Historic Context*, Cathedral City Historic Context and Resource Report, 2017  
*Residence*, 11100 Chalon Road, Los Angeles, Historic Resource Assessment, 2017  
*Motel*, 15485 Ventura Blvd, Los Angeles, Historic Resource Assessment, 2018  
*Business district*, Swarthmore Avenue Historic Resource Assessment and HABS documentation, Pacific Palisades, 2016  
*Medical Center*, Martin Luther King Jr. Medical Center, Historic Documentation and Consultant, 2015  
*Airport*, Burbank Bob Hope Airport Historic Resource Evaluations, Burbank, 2014  
*Aerospace industrial facility*, (37 Buildings), San Fernando Road, Burbank, CA, 2013

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**Awards:**

California Preservation Foundation (CPF) Design Awards: USC Doheny Library, 2002; CSU Channel Islands, 2000; UCLA Royce Hall, 1998; UCLA Powell Library, 1997, CPF Milton Marks Legislator of the Year Award, 1999. LA Conservancy Award, UCLA Royce Hall, 1999. Governor's Award for Historic Preservation, UCLA Powell Library Ceiling Restoration, 1996.

**Other Experience:**

Program Manager, National Trust for Historic Preservation, Historic Preservation Partners for Earthquake Response, Northridge Earthquake Recovery Program, 1994  
Planner, City of Pasadena, Growth Management and Urban Conservation, 1988-1990

**Affiliations and Activities:**

Director (Alternate) Metrolink, Southern California Regional Rail Authority (2018-present); State of California Road Charge Technical Advisory Committee (2015-present); Councilmember, City of Santa Monica (1994-2018; Mayor 1997, 1999, 2005, 2014); Director, Los Angeles County Metro (2001-2015); Southern California Association of Governments Regional Councilmember representing the Westside Cities Council of Governments (1996-2017) and President (2011-2012); California Coastal Commission (Alternate, 2010-2012); President, California Association of Councils of Governments (2015-2017); various national and international speaking engagements including: USC Historic Preservation Program, National League of Cities, ICLEI Local Governments for Sustainability; Local Government Commission; National Association of Regional Councils.

**Education:**

*Master of Science, Planning/Historic Preservation, Eastern Michigan University*  
*Master of Liberal Studies, Technology Management, Eastern Michigan University*  
*Bachelor Science, Journalism, Southern Illinois University*



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