NOTICE OF EXEMPTION

To: _X_ Governor's Office of Land Use and Climate Innovation
PO Box 3044, Room 113
Sacramento, CA 95812 – 3044
state.clearinghouse@opr.ca.gov

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

From: County of Los Angeles
Chief Executive Office
555 W. 5th Street, 36th Floor
Los Angeles, CA 90013

PROJECT TITLE: 1101 to 1157 Long Beach Boulevard, Land Acquisition, Permanent Affordable Housing; Land Bank Pilot Program Site #1

PROJECT LOCATION -- Specific: 1101 to 1157 Long Beach Boulevard, Long Beach CA 90813; APN 7273-007-048

PROJECT LOCATION – City: City of Long Beach

PROJECT LOCATION – County: Los Angeles

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: On November 12, 2025, the Los Angeles County Board of Supervisors (Board), approved and authorized the Chief Executive Officer (CEO), or her designee, to execute a Purchase sale Agreement (PSA) for the 28,568-square-foot (0.65-acre) property located at 1101 to 1157 Long Beach Boulevard in the Downtown area of the City of Long Beach and to establish and approve an affordable housing project as discussed below. The Metro A-Line (formerly Blue line) light rail runs along Long Beach Boulevard adjacent to the site with a stop 150 feet to the north). The purchase is part of the CEO-HI (CEO-Homeless Initiative) Land Bank Pilot Program. The Board established the Pilot Program on June 14, 2022, to create new opportunities for affordable housing in areas experiencing and set to experience rapid gentrification and displacement. The project would include an approximately 90-foot-tall affordable housing development with up to 160 units, up to 5:1 FAR and parking in accordance with code; the project could also include 2,800 square feet of community-serving commercial space and an approximately 3,000-square-foot community room and/or amenity space primarily to serve project residents. The property would include minor landscaping and low-level security lighting. The site is currently an unpaved graded vacant lot. (The site was previously occupied by a variety of residential and commercial uses through about 2020.) Subsurface parking is not anticipated. The proposed building foundation design and construction method have not been identified but could include localized foundation piles extending to some depth. However, the quantity of earth that would be disturbed is anticipated to be relatively minor. Construction is anticipated to take about 24 months. The project site is a City of Long Beach Housing Element site and thus with more than 20% of the units to be affordable to lower income households the development of housing would be by-right project in the City of Long Beach (Government Code Section 65583.2(i)).

NAME OF PUBLIC AGENCY APPROVING PROJECT: Los Angeles County

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

EXEMPT STATUS:
___ Ministerial (Sec. 2 0(b)91); 15268).
___ Declared Emergency (Sec 21080(b)(3); 15269(a))
_X_ Emergency Project (Sec 21080(b)(4); 15269(c))
__ Categorical Exemptions:
_X_ Statutory Exemptions: Consistency with Community Plan (Section 21083.3 and CEQA Guidelines Section 15183)

REASONS WHY PROJECT IS EXEMPT: Summary of Reasons is attached. Exemption Documentation for the project is available from Los Angeles County, Chief Executive Office Real Estate Division (CEO-RED), address above, or can be requested by calling 213-974-4246.

LEAD AGENCY CONTACT PERSON: Helena Dedic, CEO RED, 555 West 5th Street, 36th Floor, Los Angeles, CA 90013
Telephone: (213) 974-4200

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: Helena Dedic **Date:** 12/1/2025 **Title:** _____ Manager_____
Helena Dedic

X_ Signed by Lead Agency ___ Signed by Applicant Date Received for Filing at OPR: Not applicable

1101 to 1157 Long Beach Boulevard, Land Acquisition, Permanent Affordable Housing Summary of Reasons Why Project is Exempt Attachment

Detailed documentation of the applicable exemptions is available for review upon request from the Los Angeles County, Chief Executive Office (CEO) Real Estate Division (RED), 213-974-4246. A summary of this documentation is provided below.

California Environmental Quality Act [CEQA] Section 21065; CEQA Guidelines Section 15378(b)(5) – Project Definition
The proposed acquisition and interim maintenance of the project site (ongoing maintenance of the vacant site) is exempt from CEQA because it does not constitute a project as defined under CEQA since the actions are (1) activities that are excluded from the definition of a project by CEQA Section 21065, and (2) administrative activities of government under section 15378(b)(5) of the State CEQA Guidelines because the action would not result in direct or indirect physical changes to the environment. No changes to the existing vacant lot are proposed as part of the interim operation.

The affordable housing project is exempt from CEQA as follows:

CEQA Section 21083.3, CEQA Guidelines Section 15183 – Consistency with Community Plan

The project would be consistent with the Transit Oriented Development (TOD) land use designation in the Land Use Element and with zoning: the site is in the Downtown Planned Development Zone (PD-30) that provides flexible zoning; residential use is permitted; 150-foot height limit; 5:1 FAR with no setbacks required; 20% of the lot to be common outdoor open space; minimum street wall of six stories on 75% of the public street frontage but with variation in height as well as other design requirements. There are no environmental impacts peculiar to the project or parcel. Impacts would be less than identified in the Land Use Element and Downton Plan EIRs. The project not include mitigation measures from these EIRs as the project would not result in significant impacts.

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

Homelessness in the County of Los Angeles experienced a large increase from 2016 to 2023, with 2024 remaining similar to 2023 and 2025 seeing a small (4%) countywide decrease. 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. In 2025 the overall homeless count was 72,308 countywide; countywide unsheltered homelessness decreased from 2024 by 9.5% while sheltered homelessness increased 8.5%. 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. 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. 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 permanent affordable housing and would house people thus addressing the homelessness emergency by providing for people to avoid or move from temporary shelters. Thus, the project would be eligible for the CEQA emergency project exemption.

CEQA Guidelines 15061(b)(3) – Common Sense Exemption
Temporary continuation of the existing vacant lot would result in the same impacts as at present and would have no possibility of an increase in impacts.

CEQA Guidelines Section 15301 – Class1 – Existing Facilities
Interim maintenance of the existing lot would be eligible for a Class 1 Exemption as the existing use would remain with no expansion in use.

Exemption Documentation

1101 to 1157 Long Beach Boulevard Land Acquisition Permanent Affordable Housing Land Bank Pilot Program Site #1

Sirius Environmental

September 2025

EXEMPTION DOCUMENTATION
1101 TO 1157 LONG BEACH BOULEVARD
LAND ACQUISITION
PERMANENT AFFORDABLE HOUSING
LAND BANK PILOT PROGRAM SITE #1

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1. PROJECT DESCRIPTION

Existing Uses

The 28,568-square-foot project site (per County documentation) known as 1101 to 1157 Long Beach Boulevard, is located on the east side of Long Beach Boulevard south of 12th Street. The site is currently an unpaved graded vacant lot. The site was previously occupied by a variety of residential and commercial uses through about 2020.

The site is within the Downtown Planned Development zone (PD-30) that is a flexible zone that allows for a variety of uses including residential. The site is within a Transit Priority Area (i.e. it is within ½ mile of a major transit stop – a light rail stop is located adjacent to the site). The project site is a City of Long Beach Housing Element site and thus with more than 20% of the units to be affordable to lower income households the development of housing would be a by-right project in the City of Long Beach (Government Code Section 65583.2(i)).

Uses surrounding the project site include a mix of commercial uses, hotel, recreation and residential uses:

- Immediately adjacent to the south a new 5-story apartment building with ground floor commercial use.
- To the west across Waite Court (about 17 feet) are older two-story multi-family residential buildings.
- To the north across 12th Street (about 52 feet) is a newer five to seven-story apartment building with ground floor commercial uses
- To the east across Long beach Boulevard (about 125 feet) are one-story commercial buildings, to the southeast is an open grassy area associated with the Dignity Health St. Mary Medical Center.

Figure 1 shows an aerial view of the project site and area. **Figure 2** shows the site from the south looking northwest across Long Beach Boulevard. **Figure 3** shows the site from the west looking east along 12th Street. The site and surrounding area are generally flat.

Proposed Actions (Nature, Purpose and Beneficiaries)

The current action is the purchase of the site as part of the CEO-HI (CEO-Homeless Initiative) Land Bank Pilot Program (Pilot Program). The Los Angeles County Board of Supervisors established the Pilot Program on June 14, 2022, to create new opportunities for affordable housing in areas experiencing and set to experience rapid gentrification and displacement. In addition to approving purchase of the site, the Board of Supervisors approved an affordable housing project for the site. The proposed affordable housing project on this site would include an approximately 90-foot-tall affordable housing development with up to 160 units, up to 5:1 FAR and with parking provided in accordance with code; the project could also include 2,800 square feet of community-serving commercial space and an approximately 3,000-square-foot community room and/or amenity space primarily to serve project residents. The size/unit mix of the residential units (number of bedrooms) has not been determined. The property would be landscaped and include low-level security lighting. Subsurface parking is not proposed.

Affordable housing projects are desperately needed to provide for People Experiencing Homelessness (PEH) to move from the shelter system into a more long-term solution that allows them to start to build or rebuild their lives. Without affordable housing PEH remain in shelters for substantially longer periods of time and people newly falling into homelessness are not able to find shelter. Moving people from shelters to affordable housing allows the shelters to function properly as short-term solutions. Affordable housing is needed as urgently as shelters in order to provide people with hope and a realistic means to reenter/contribute to society.

Construction

The proposed building foundation design and construction method have not been identified but could include localized foundation piles (drilled) extending to some depth. However, the quantity of earth that would be disturbed is anticipated to be relatively minor. Construction would be approximately 24 months and typical of all urban development. It is anticipated that staging would occur on-site except minor staging for utility connections off-site. Construction activities would entail ground clearing, foundations and building construction. The site is relatively small (0.65 acres) and therefore use of heavy equipment will be constrained as is typical for a small urban site.

Operational Characteristics

The affordable housing project with 160 units (size and unit mix to be determined) and small commercial area and community room/amenity space would operate in a similar way to other apartment buildings in the area. The building would include a managers unit or other small space for a building manager.

The site is well-served by transit, with numerous bus lines in the area and the Anaheim Street light rail station on the Metro A-line (formerly Blue line) located in the center median of Long beach Boulevard across from the site.

Discretionary Actions

The currently proposed action by the Board of Supervisors, acting on behalf of the County of Los Angeles, includes authorizing the Chief Executive Officer or her designee to purchase the project site as part of the Land Bank Pilot program and to establish and approve an affordable housing project as identified above. Future actions may include executing an exclusive negotiating agreement (ENA) with a developer, authorizing a ground lease agreement, and potentially funding approval(s) for the affordable housing project.[1] One or more of these future actions may be a discretionary decision on the part of the County and subject to further environmental review.

[1] Per Government Code section 25351: Whenever the board of supervisors of a county decides to go out to bid to construct a county building, expand an existing building, expand the use of an existing building, or enter into a lease of an existing building within the incorporated territory of a city, the board shall notify in writing, at least 60 days prior to going to bid or entering into a lease, the city clerk of the city where the building is to be constructed, expanded, or leased.

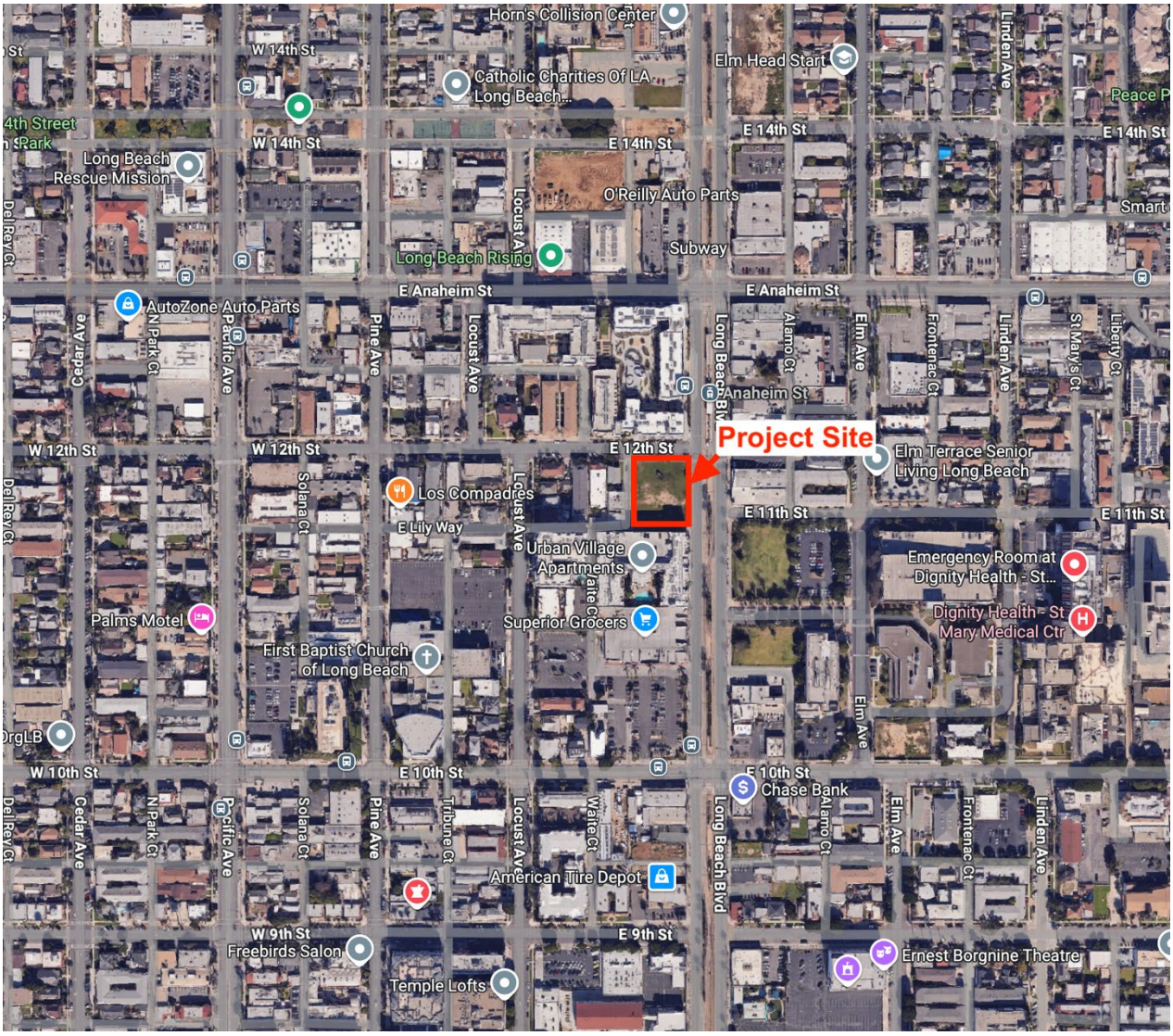

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Figure 1: Aerial View of Project Site and Vicinity

Figure 2: Project Site Looking West across Long Beach Boulevard

Figure 3: Project Site Looking East Along 12th Street

2. DEFINITIONS AND APPLICABLE CEQA EXEMPTIONS

INTRODUCTION

Public Resources Code (CEQA) 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 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.

AB 130 was recently passed into law and is codified in CEQA Section 21080.66 and provides an exemption from CEQA for infill housing projects that meet certain criteria.

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.

APPLICABLE STATUTORY EXEMPTIONS (CEQA AND CEQA GUIDELINES)

Consistency with Community Plan Exemption (CEQA Section 21083.3 and CEQA Guidelines Section 15183)

21083.3

a) If a parcel has been zoned to accommodate a particular density of development or has been designated in a community plan to accommodate a particular density of development and an environmental impact report was certified for that zoning or planning action, the application of this division to the approval of any subdivision map or other project that is consistent with the zoning or community plan shall be limited to effects upon the environment which are peculiar to the parcel or to the project and which were not addressed as significant effects in the prior environmental impact report, or which substantial new information shows will be more significant than described in the prior environmental impact report.

(b) If a development project is consistent with the general plan of a local agency and an environmental impact report was certified with respect to that general plan, the application of this division to the approval of that development project shall be limited to effects on the environment which are peculiar to the parcel or to the project and which were not addressed as significant effects in the prior environmental impact report, or which substantial new information shows will be more significant than described in the prior environmental impact report.

(c) Nothing in this section affects any requirement to analyze potentially significant offsite impacts and cumulative impacts of the project not discussed in the prior environmental impact report with respect to the general plan. However, all public agencies with authority to mitigate the significant effects shall undertake or require the undertaking of any feasible mitigation measures specified in the prior environmental impact report relevant to a significant effect which the project will have on the environment or, if not, then the provisions of this section shall have no application to that effect. The lead agency shall make a finding, at a public hearing, as to whether those mitigation measures will be undertaken.

(d) An effect of a project upon the environment shall not be considered peculiar to the parcel or to the project, for purposes of this section, if uniformly applied development policies or standards have been previously adopted by the city or county, with a finding based upon substantial evidence, which need not include an environmental impact report, that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect.
(e) Where a community plan is the basis for application of this section, any rezoning action consistent with the community plan shall be a project subject to exemption from this division in accordance with this section. As used in this section, "community plan" means a part of the general plan of a city or county which (1) applies to a defined geographic portion of the total area included in the general plan, (2) complies with Article 5 (commencing with Section 65300) of Chapter 3 of Division 1 of Title 7 of the Government Code by including or referencing each of the mandatory elements specified in Section 65302 of the Government Code, and (3) contains specific development policies adopted for the area included in the community plan and identifies measures to implement those policies, so that the policies which will apply to each parcel can be determined.
(f) No person shall have standing to bring an action or proceeding to attack, review, set aside, void, or annul a finding of a public agency made at a public hearing pursuant to subdivision (a) with respect to the conformity of the project to the mitigation measures identified in the prior environmental impact report for the zoning or planning action, unless he or she has participated in that public hearing. However, this subdivision shall not be applicable if the local agency failed to give public notice of the hearing as required by law. For purposes of this subdivision, a person has participated in the public hearing if he or she has either submitted oral or written testimony regarding the proposed determination, finding, or decision prior to the close of the hearing.
(g) Any community plan adopted prior to January 1, 1982, which does not comply with the definitional criteria specified in subdivision (e) may be amended to comply with that criteria, in which case the plan shall be deemed a "community plan" within the meaning of subdivision (e) if (1) an environmental impact report was certified for adoption of the plan, and (2) at the time of the conforming amendment, the environmental impact report has not been held inadequate by a court of this state and is not the subject of pending litigation challenging its adequacy.

15183

(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.
(b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

- *(1) Are peculiar to the project or the parcel on which the project would be located,*
- *(2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent,*
- *(3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or*
- *(4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.*

(c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.

(d) This section shall apply only to projects which meet the following conditions:

(1) The project is consistent with:

(A) A community plan adopted as part of a general plan,

(B) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or

(C) A general plan of a local agency, and

(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

(e) This section shall limit the analysis of only those significant environmental effects for which:

(1) Each public agency with authority to mitigate any of the significant effects on the environment identified in the EIR on the planning or zoning action undertakes or requires others to undertake mitigation measures specified in the EIR which the lead agency found to be feasible, and

(2) The lead agency makes a finding at a public hearing as to whether the feasible mitigation measures will be undertaken.

(f) An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the city or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect. The finding shall be based on substantial evidence which need not include an EIR. Such development policies or standards need not apply throughout the entire city or county, but can apply only within the zoning district in which the project is located, or within the area subject to the community plan on which the lead agency is relying. Moreover, such policies or standards need not be part of the general plan or any community plan, but can be found within another pertinent planning document such as a zoning ordinance. Where a city or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decisionmaking body of the city or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project. Such a public hearing need only be held if the city or county decides to apply the standards or policies as permitted in this section.

(g) Examples of uniformly applied development policies or standards include, but are not limited to:

(1) Parking ordinances,

(2) Public access requirements,

(3) Grading ordinances.

(4) Hillside development ordinances.

(5) Flood plain ordinances.

(6) Habitat protection or conservation ordinances.

(7) View protection ordinances.

(8) Requirements for reducing greenhouse gas emissions, as set forth in adopted land use plans, policies, or regulations.

(h) An environmental effect shall not be considered peculiar to the project or parcel solely because no uniformly applied development policy or standard is applicable to it.

(i) Where the prior EIR relied upon by the lead agency was prepared for a general plan or community plan that meets the requirements of this section, any rezoning action consistent with the general plan or community plan shall be treated as a project subject to this section.

(1) "Community plan" is defined as a part of the general plan of a city or county which applies to a defined geographic portion of the total area included in the general plan, includes or references each of the mandatory elements specified in Section 65302 of the Government Code, and contains specific development policies and implementation measures which will apply those policies to each involved parcel.

(2) For purposes of this section, "consistent" means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.

(j) This section does not affect any requirement to analyze potentially significant offsite or cumulative impacts if those impacts were not adequately discussed in the prior EIR. If a significant offsite or cumulative impact was adequately discussed in the prior EIR, then this section may be used as a basis for excluding further analysis of that offsite or cumulative impact.

The project is consistent with the General Plan Land Use and Urban Design Elements and the Downtown Plan. It would be consistent with the general plan land use designation – Transit-Oriented District. The project would be consistent with zoning (including allowing for state-mandated density bonus): the site is in the Downtown Planned Development Zone (PD-30) that provides flexible zoning; residential use is permitted; 150-foot height limit; 5:1 FAR with no setbacks required; 20% of the lot to be common outdoor open space; minimum street wall of six stories on 75% of the public street frontage but with variation in height as well as other design requirements. There are no environmental impacts peculiar to the project or parcel. Impacts would be less than identified in the Land Use Element and Urban Design Elements Final EIR as well as the Downtown Plan PEIR; given the small size of the project and urban location no impacts would rise to the level of significance. No significant impacts are anticipated from the project and therefore no mitigation is required.

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

CEQA 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 County of Los Angeles experienced a large increase from 2016 to 2023, with 2024 remaining similar to 2023 and 2025 seeing a small (4%) countywide decrease. 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. In 2025 the overall homeless count was 72,308 countywide; countywide unsheltered homelessness decreased from 2024 by 9.5% while sheltered homelessness increased 8.5%. 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. 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. 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 permanent affordable housing in an expeditious manner and would address the homelessness emergency by providing for people to avoid or move from temporary shelters. Thus, the project would be eligible for the CEQA emergency project exemption.

3. Analysis -- Emergency Project Statutory Exemption (CEQA Section 21080, CEQA Guidelines Section 15269)

Emergency Need for Immediate Action [CEQA Section 21080(b)(4) and CEQA Guidelines Section 15269(c)]

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 the County, homelessness is an emergency condition (see also **Attachment A** for more details regarding the background of the homelessness emergency). Homelessness in the County of Los Angeles has increased catastrophically over the past decade and while it has eased over the past two years the emergency continues.

According to the 2023 Greater Los Angeles Homeless Count, the County of Los Angeles had approximately 75,518 people experiencing homelessness countywide (a 9% 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).[2,3] In 2025 the overall homeless count was 72,308 countywide; countywide unsheltered homelessness decreased from 2024 by 9.5% while sheltered homelessness increased 8.5%.[4] 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.

Over time 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 (as noted above in 2024 the homeless count was reduced 2% as compared to 2023). In 2020 it was up approximately 12.7% from 2019, and up from about 32,000 in 2010[5] -- an increase of 136% in 12 years.

The LA area has experienced 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.[6]

On October 30, 2018, and again on October 19, 2021[7] the LA County Board of Supervisors declared a shelter crisis to address homelessness in unincorporated LA County.

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. [8] Typhus is a disease spread by rats that is often associated with cramped unhygienic

2 https://www.lahsa.org/documents?id=8170-los-angeles-county-hc2024-data-summary
3 https://www.lahsa.org/documents?id=8152-city-of-los-angeles-hc2024-data-summary
4 https://www.lahsa.org/news?article=1044-declining-homelessness-is-now-a-trend-in-los-angeles-county
5 Los Angeles Homeless Services Authority, May 2017
6 Ibid
7 https://file.lacounty.gov/SDSInter/bos/supdocs/162768.pdf
8 http://publichealth.lacounty.gov/eprp/Health%20Alerts/LAHANTyphusupdate101218.pdf

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). [9] Contagious diseases that start in homeless populations have the potential to spread to the rest of the population. These diseases, however, were dwarfed by the Covid-19 pandemic. The Covid-19 pandemic severely impacted the homeless population. In addition, as financial and other support from the pandemic diminishes more people are facing homelessness as a result of lost their jobs and increasing hosing costs.

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.[10]

The number of homeless deaths has increased dramatically in recent years (from 658 in 2014 to 2,374 in 2022), see **Figure 6** 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.

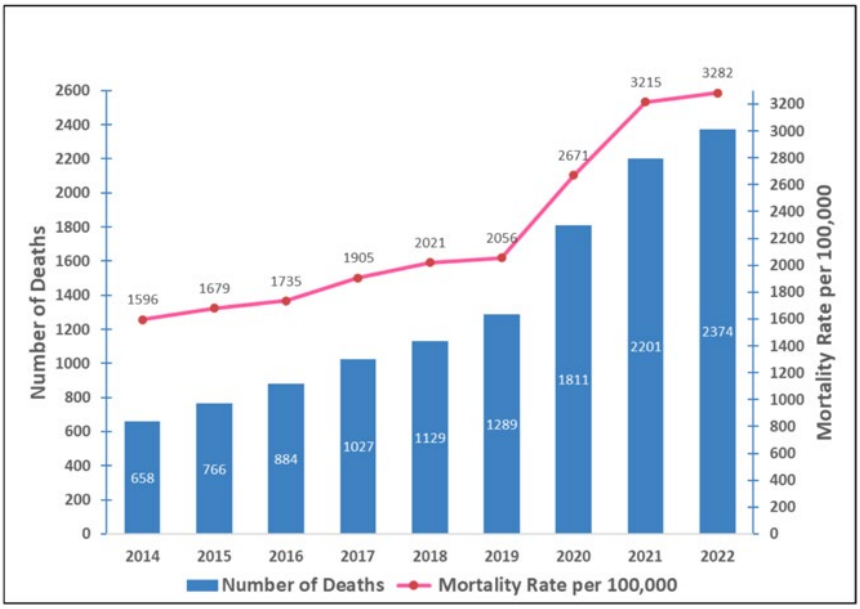

Figure 4: LA County Homeless Deaths and Mortality Rates, 2014 - 2022

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. The Covid-19 pandemic exacerbated stressors already present in the lives of PEH, leading to increases in other causes of death,

[9] http://publichealth.lacounty.gov/eprp/Health%20Alerts/DPH%20HAN%20Hep%20A%20Outbreak%20091917.pdf

[10] 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 COIVD-19 Pandemic. April 2022.

even as we redoubled our Covid-19 prevention efforts in this population. Thus, as the pandemic subsides, disproportionally 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 [CEQA Section 21080(b)(4) and CEQA Guidelines Section 15269(c)]

This project would provide approximately 139 affordable units. Provision of affordable housing is one necessary part of alleviating the City and County homelessness emergency and shelter crisis. The affordable housing project would provide relief to the housing system which addresses the homelessness problem as a whole and results in relief to people in extreme conditions that expose them to the elements as well as other safety issues associated with being unsheltered. The project would assist in moving people from shelters to a more humane housing solution, thus freeing up more shelter beds which would allow people to get off the street faster. Given the still extremely large homeless population, the project is urgently needed to mitigate the homelessness situation in Los Angeles County.

Projects Excluded from Exemption [CEQA Guidelines Section 15269(c)]

The project does not meet the CEQA guidance for exclusion from this exemption. While affordable housing cannot be undertaken instantaneously, it is necessary to be completed as fast as possible to alleviate the crisis. The Land Banking Pilot program is an effort to provide housing on an expedited basis consistent with state, regional, and County policy. People are in immediate need of affordable housing. The project would directly address the homeless emergency by providing affordable housing as fast as possible. While the affordable housing project may not take people off the street directly, it is anticipated to either take people from the shelter system or others who are in danger of falling into homelessness. The situation (homelessness) that the project will address is already occurring. The anticipated period of time to conduct additional environmental review would result in delay in providing permanent housing which in turn would result in people using the shelter system for longer which could mean fewer shelter beds for people on the street or in facilities that could be used by the homeless. For each day of delay, an estimated 22 homeless people would spend that extra time on the street. The County is providing shelter facilities and housing elsewhere, but combined these activities are still insufficient to address the emergency. Therefore, the project (as well as all the other projects proceeding simultaneously to address homelessness in the County of Los Angeles) is an emergency project in accordance with CEQA and CEQA Guidelines.

4. Analysis – Consistency with Community Plan Statutory Exemption (CEQA Section 21083.3; CEQA Guidelines Section 15183)

Community Plan and Prior Environmental Impact Report(s); Zoning [CEQA Section 21083.3(a)(b); CEQA Guidelines Section 15183(d)]

The project is consistent with the General Plan Land Use and Urban Design Elements. The Land Use and Urban Design Elements references all the other General Plan elements. The project would be consistent with the general plan land use designation – Transit-Oriented District (TOD). The project would be consistent with the Land Use and Urban Design Elements policies to increase housing options near transit and reduce automobile dependency.

The City's broadest reaching plan document is the General Plan. The Downtown Plan provides localized guidance and standards for new development. The project would be consistent with zoning in the Downtown Plan: the site is in the Downtown Planned Development Zone (PD-30) that provides flexible zoning; residential use is permitted; 150-foot height limit; 5:1 FAR with no setbacks required; 20% of the lot to be common outdoor open space; minimum street wall of six stories on 75% of the public street frontage but with variation in height as well as other design requirements.

The project is consistent with:

- A zoning action (PD-30 zone including allowance for state-mandated density bonus) which zoned the project site to accommodate flexible development; and
- The Long Beach General Plan (Land Use and Urban Design Elements), and

Environmental Impact Reports were certified by the City of Long Beach for both the Land Use and Urban Design Elements and the Downtown Plan.[11, 12] In addition, the project is also consistent with the most recent Housing Element that identifies the site as a housing opportunity site.

Offsite and Cumulative Impacts [CEQA Section 21083.3(c); CEQA Guidelines Section 15183(j)]

Offsite and cumulative impacts are addressed in the Land Use and Urban Design Elements EIR and Downtown Plan EIR. The project would not be expected to represent a considerable fraction of cumulative impacts. Impacts of any individual project are less than the total impacts identified in the Land Use and Urban Design Elements EIR and Downton Plan EIR. Given the size and location of the project, no significant impacts are anticipated and none of the mitigation measures identified in the EIRs are relevant to the project. The County Board of Supervisors will make a finding regarding mitigation measures from the prior EIRs are not to be undertaken because no significant impacts are anticipated. The project approval action will be placed on a public meeting agenda of the Board of Supervisors.

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[11] City of Long Beach, Land Use and Urban Design Elements Final Recirculated EIR, SCH Number: 2015051054; October 2019

[12] City of Long Beach, Downtown Plan Program Final Program EIR, SCH Number 2009071006; November 2011

Impacts Peculiar to the Project Site [CEQA Section 21083.3(d) and CEQA Guidelines Section 15183(a)-(c), (e) – (i)]

There are no environmental impacts peculiar to the project or parcel. There is nothing unusual about the project or the site. The project would be consistent with the Land Use and Urban Design Elements as well as the Downtown Plan (with application of Density Bonus law as required); no rezoning action is required. Impacts would be as expected in both the Land Use Element EIR and Downtown Plan EIR, with the exception that the Land Use and Urban Design Elements EIR and Downtown Plan EIR address all impacts of all reasonably anticipated development, and the project is just one small part of that and as such would result in impacts at a lesser scale than evaluated in the Urban Design Element EIR and Downtown Plan EIR. In order to examine potential impacts of the project, all significant and potentially significant impacts identified in the Land Use and Urban Design Elements EIR and Downtown Plan EIR were evaluated to determine whether project impacts would have the potential to be significant and whether the mitigation measures identified in the Land Use and Urban Design Elements EIR and Downtown Plan EIR would be applicable (see tables below). In addition to being consistent with the Land Use Element of the General Plan the project is also consistent with the most recent Housing Element for which an EIR Addendum was prepared in September 2021. Mitigation measures in the Housing Element EIR (measures are only identified for Air Quality and Traffic) are similar to those in the Land Use Element and Downtown Plan EIRs; the same analyses apply.

The analysis indicates:

(1) There are no impacts that are peculiar to the project or the project site.
(2) There are no potential impacts of the project that were not analyzed as significant effects in the prior EIRs; the project is consistent with the Downtown Plan.
(3) The project would not result in any potentially significant off-site impacts and/or cumulatively considerable impacts which were not discussed in the prior EIRs.
(4) There is no substantial new information since the prior EIRs were certified that would result in more severe adverse impact than discussed therein.

Table 1: City of Long Beach Land Use and Urban Design Elements EIR Applicability of Mitigation Measures to Project

Impact	Measure	Project Impact and Mitigation Applicability
Aesthetics		
Less than significant impacts		
Air Quality		
Conflict or obstruct air quality plan. * Emissions modeling * Updated growth forecasts based on new land uses. (Significant and unavoidable.)	Non feasible.	Not applicable. Evaluation of template projects was undertaken as part of the 2024 RTP/SCS EIR; that analysis shows that high-mid and high-range projects (greater than 160 workers, 19 pieces of heavy equipment and 150 one-way truck trips) and projects greater than an acre would have the potential to result in significant construction impacts. The project would be much smaller

Table 1: City of Long Beach Land Use and Urban Design Elements EIR Applicability of Mitigation Measures to Project

Impact	Measure	Project Impact and Mitigation Applicability
		than this and would not be expected to generate significant construction emissions.[13] In addition existing regulations reduce emissions as compared to the analyses in the EIR and require appropriate dust control, and limit engine idling.
Violate air quality standard or contribute to an existing violation. Construction. (Significant and unavoidable.)	**MM AQ-1**: Prior to issuance of any construction permits, future development projects subject to discretionary review under the California Environmental Quality Act (CEQA) shall prepare and submit to the Director of the City of Long Beach (City) Department of Development Services, or designee, a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the Department of Development Services shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the Department of Development Services. Mitigation measures to reduce construction-related emissions include, but are not limited to, the following: • Require the following fugitive-dust control measures: o Use nontoxic soil stabilizers to reduce wind erosion. o Apply water every 4 hours to active soil-disturbing activities. o Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Use construction equipment rated by the United States Environmental Protection Agency (USEPA) as having Tier 4 (model year 2008 or newer) emission limits (when available), or Tier 3 (model year 2006 or newer), applicable for engines between 50 and 750 horsepower. • Ensure that construction equipment is properly serviced and maintained to the manufacturers' standards. • Limit nonessential idling of construction equipment to no more than 5 consecutive minutes. • Using Super-Compliant volatile organic compound (VOC) paints for coating of architectural surfaces whenever possible. (A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD website at http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf.) • Suspend all soil disturbance activities when winds exceed	Same as above.

[13] https://scag.ca.gov/sites/default/files/2024-05/23-3052-peir-2024-draft-3-3-air-quality.pdf; page 3.3-49 and 3.3-65

Table 1: City of Long Beach Land Use and Urban Design Elements EIR Applicability of Mitigation Measures to Project

Impact	Measure	Project Impact and Mitigation Applicability
	25 miles per hour (mph) as instantaneous gusts or when visible plumes emanate from the site and stabilize all disturbed areas. • Post a publicly visible sign with the telephone number and person to contact at the City of Long Beach regarding dust complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations. • Sweep all streets at least once a day using SCAQMD Rule 1186, 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets. The use of water sweepers with reclaimed water is recommended. • Apply water three times daily or non-toxic soil stabilizers according to manufactures' specifications to all unpaved parking or staging areas, unpaved road surfaces, or to areas where soil is disturbed. Reclaimed water should be used when available. • Construction vendors, contractors, and/or haul truck operators shall utilize 2010 model year trucks (e.g., material delivery trucks and soil import/export) that meet the California Air Resources Board's (CARB) 2010 engine emission standards at 0.01 grams per brake horsepower-hour (g/bhp-hr) of particulate (PM) and 0.20 g/bhp-hr of nitrogen oxides (NOX) emissions or newer, cleaner trucks. Operators shall maintain records of all trucks associated with the project construction to document that each truck used meets these emission standards and shall make the records available for inspection.	
Violate air quality standard or contribute to an existing violation. Operation. (Significant and unavoidable.)	**MM AQ-2**: Prior to future discretionary project approval, development project applicants shall prepare and submit to the Director of the City Department of Development Services, or designee, a technical assessment evaluating potential project operation phase-related air quality impacts. The evaluation shall be prepared in conformance with SCAQMD methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the Department of Development Services shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the Project Conditions of Approval. Below are possible mitigation measures to reduce long- term emissions include but are not limited to: • For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plugging in the anticipated number of refrigerated trailers to reduce idling time and emissions. • Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use. • Site-specific developments with truck delivery and loading	Same as above.

Table 1: City of Long Beach Land Use and Urban Design Elements EIR Applicability of Mitigation Measures to Project

Impact	Measure	Project Impact and Mitigation Applicability
	areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with CARB Rule 2845 (13 California Code of Regulations [CCR] Chapter 10, Section 2485). • Require that 240-volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of neighborhood electric vehicles (NEVs) and/or battery powered vehicles. • Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs throughout the City to generate solar energy. • Maximize the planting of trees in landscaping and parking lots. • Use light-colored paving and roofing materials. • Require use of electric or alternatively fueled street-sweepers with HEPA filters. • Require use of electric lawn mowers and leaf blowers. • Utilize only Energy Star heating, cooling, and lighting devices, and appliances. • Use of water-based or low volatile organic compound (VOC) cleaning products.	
Impacts to sensitive receptors. (Less than significant with mitigation.)	**MM AQ-3**: Prior to future discretionary approval for projects that require environmental evaluation under CEQA, the City of Long Beach shall evaluate new development proposals for new industrial or warehousing land uses that (1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and (2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use. Such projects shall submit a Health Risk Assessment (HRA) to the City Department of Development Services. The HRA shall be prepared in accordance with policies and procedures of the most current State Office of Environmental Health Hazard Assessment (OEHHA) and the SCAQMD. If the HRA shows that the incremental health risks exceed their respective thresholds, as established by the SCAQMD at the time a project is considered, the Applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs), including appropriate enforcement mechanisms to reduce risks to an acceptable level. T-BACTs may include, but are not limited to, restricting idling on site or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.	Not applicable – not an industrial or warehouse land use.
Greenhouse Gas Emissions		
GHG emissions and potential impact on the environment.	**MM GHG-1**: The City of Long Beach (City) shall develop and adopt a greenhouse gas (GHG) Reduction Plan or	Not applicable. An affordable housing project adjacent to

Table 1: City of Long Beach Land Use and Urban Design Elements EIR Applicability of Mitigation Measures to Project

Impact	Measure	Project Impact and Mitigation Applicability
(Significant and unavoidable) Conflict with any plan or policy for the purpose of reducing GHG emissions. (Less than significant)	Climate Action and Adaptation Plan (CAAP) to ensure that the City continues on a trajectory that aligns with the short-term, interim, and long-term State GHG reduction goals Within approximately 36 months of adoption of the proposed General Plan Land Use Element (LUE)/Urban Design Element (UDE) project, the City of Long Beach shall prepare and present a CAAP to the City Council for adoption. The CAAP shall identify strategies to be implemented to reduce GHG emissions associated with the City. In addition, the City shall monitor GHG emissions by updating its community-wide GHG emissions inventory every 5 years upon adoption of the initial CAAP, which will include details on how the reduction programs will be implemented and will designate responsible parties to monitor progress and ensure implementation of the reductions within the CAAP. A monitoring and reporting program shall be included to ensure the CAAP achieves the reduction targets.	transit that is required to comply with Title 24, complies with the latest policies at the state and regional level to reduce GHG emissions to an acceptable level.
Land Use and Planning		
Less than significant impacts		
Noise		
Generate substantial temporary or permanent increase in ambient noise in excess of standards established in the general plan or noise ordinance or applicable standards. (Short term construction – significant and unavoidable. Long-term operational – less than significant.) Vibration (Less than significant with mitigation.)	**MM NOI-1**: Project contractors shall implement the following construction best management practices during construction activities: • Schedule high-noise and vibration-producing activities to a shorter window of time during the day outside early morning hours to minimize disruption to sensitive uses. • Grading and construction contractors shall use equipment that generates lower noise and vibration levels, such as rubber-tired equipment rather than metal-tracked equipment. • Construction haul trucks and materials delivery traffic shall avoid residential areas whenever feasible. • The construction contractor shall place noise- and vibration-generating construction equipment and locate construction staging areas away from sensitive uses whenever feasible. • Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all project construction. • Prohibit extended idling time of internal combustion engines. • Ensure that all general construction related activities are restricted to 7:00 a.m. and 7:00 p.m. on weekdays and federal holidays, and between 9:00 a.m. and 6:00 p.m. on Saturdays. No construction would be permitted on Sundays. Construction activities occurring outside of these hours may be permitted with authorization by the Building Official and/or permit issued by the Noise Control Officer. • All residential units located within 500 feet of a construction site shall be sent a notice regarding the construction schedule. A sign legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and durations of construction	Not applicable. Construction noise would be similar to all urban construction projects. Project construction would comply with applicable noise regulations that would limit hours and days of construction. Noise would be intermittent as different pieces of equipment traverse the site and as the building is constructed. Construction noise is short-term and while it can be annoying to neighbors, it is temporary, typical of the urban environment and not considered significant under CEQA. Standard noise abatement measures/Best Management Practices would be undertaken as applicable: • Muffler systems can reduce engine noise on individual pieces of equipment by 3 dBA up to as much as 35 dBA.[14] • Sound walls/barriers, depending on height and materials, can reduce noise levels by up to about 20 dBA, but more typically temporary barriers reduce noise be about

[14] Caterpillar specifications for generators: http://s7d2.scene7.com/is/content/Caterpillar/C10886689

Table 1: City of Long Beach Land Use and Urban Design Elements EIR Applicability of Mitigation Measures to Project

Impact	Measure	Project Impact and Mitigation Applicability
	activities, as well as provide a telephone number for a "noise disturbance coordinator." • A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early or bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. • For all projects determined to have unusual or extremely loud construction activities (e.g., pile driving, nighttime construction work, or unusually long construction duration, etc.) that would generate noise levels over 90 dBA Leq at nearby sensitive receptors, temporary noise control blanket barriers shall be installed in a manner to shield sensitive receptors land uses.	15 dBA.[15] • Noise dampening and shields such as sound skins can achieve reductions of 5 dBA to 10 dBA.[16] • Sound aprons taking the form of sound absorptive mats hung from the equipment or on frames attached to the equipment can reduce noise levels of individual pieces of equipment by 10 dBA.[17] The aprons can be constructed of rubber, lead-filled fabric, or PVC layers with possibly sound absorptive material covering the side facing the machine. Sound aprons are useful when the shielding must be frequently removed or if only partial covering is possible. • Enclosures for stationary work may be constructed of wood or any other suitable material and typically surround the specific operation area and equipment. The walls could be lined with sound absorptive material to prevent an increase of sound levels within the structure. They are typically designed for ease of erection and dismantling. Enclosures may achieve noise reductions up to 25 dBA.[18] • Equipment maintenance and proper operation can also achieve noise reductions.
Population and Housing		
Less than significant impacts.		
Public Services		
Less than significant impacts.		
Transportation/Traffic		

[15] Example construction sound wall: https://www.acousticalsurfaces.com/curtan_stop/sound_blankets.htm. Sound transmission class (STC) is measured to calculate the effectiveness of soundproofing materials in reducing sound transmission. STC is decibels (dB) reduction in noise a material/ partition can provide. A noise reduction coefficient (NRC) is an average rating of how much sound an acoustic product can absorb. NRC is measured on a scale that ranges from 0 to 1. An NRC of 0 means that the product absorbs no sound. An NRC of 1 means that the product absorbs all sound.

[16] https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm

[17] https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm

[18] http://allnoisecontrol.com/industrial-manufacturing/

Table 1: City of Long Beach Land Use and Urban Design Elements EIR Applicability of Mitigation Measures to Project

Impact	Measure	Project Impact and Mitigation Applicability
Conflict with a program or policy addressing the circulation system. * Intersection impacts * Impact to transit ridership * Impacts to freeways (Significant and unavoidable.)	**MM T-1**: Prior to approval of any discretionary project that is forecast to generate 100 or more peak-hour trips, as determined by the City of Long Beach (City) Traffic Engineer, the property owners/developers shall prepare a traffic improvement analysis of any facilities under the jurisdiction of Caltrans at which the project is anticipated to contribute 50 or more peak-hour trips, analyzing the impact on such state transportation facilities where Caltrans has previously prepared a valid traffic study, as identified below, and identified feasible operational and physical improvements and has determined the associated fees necessary to mitigate project-related impacts. The fair share cost of such improvements shall be assessed if transportation analysis demonstrates such improvements can achieve vehicle level of service (LOS) D (as measured by Intersection Capacity Utilization or Highway Capacity Manual methodology) or an improved vehicle level of service, if LOS D cannot be feasibly achieved. The Conditions of Approval for the project shall require the property owner/developer to construct, bond for, or pay reasonable fair share fees to the City who will work jointly with Caltrans to implement such improvements, unless alternative funding sources have been identified. In the event that Caltrans prepares a valid study, as defined below, that identifies fair share contribution funding sources attributable to and paid from private development to supplement other regional and State funding sources necessary to undertake improvements of impacted state transportation facilities, then the project applicant shall use reasonable efforts to pay the applicable fair share amount to Caltrans. The study shall be reviewed and approved by the California Transportation Commission. It shall include fair share contributions related to private development based on nexus requirements contained in the Mitigation Fee Act (Govt. Code § 66000 et seq.) and 14 Cal. Code of Regs. § 15126.4(a)(4) and, to this end, the study shall recognize that impacts to Caltrans facilities that are not attributable to development located within the City of Long Beach are not required to pay in excess of such developments' fair share obligations. The fee study shall also be compliant with Government Code § 66001(g) and any other applicable provisions of law. If Caltrans chooses to accept the project Applicant's fair share payment, Caltrans shall apply the payment to the fee program adopted by Caltrans or agreed upon by the City and Caltrans as a result of the fair share fee study.	The project is located within a Transit Priority Area (TPA).[19] OPR recommends presuming projects within 0.5 miles of transit and residential development that is 100 percent affordable be assessed as having a less than significant transportation impact.[20] The County's Transportation Impact Analysis Guidelines indicate that projects with 100% of the units (excluding the manager's unit) set aside for lower income households need not undertake further analysis.[21] Therefore, as an affordable housing project, traffic impacts are considered to be less than significant. (Impacts with respect to delay are no longer considered significant. Traffic impacts are measured based on Vehicle Miles Travelled (VMT)).

[19] A Transit Priority Area is an area within one-half mile of a major transit stop that is existing or planned. Section 21064.3 of the Public Resources Code (PRC) defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

[20] Technical Advisory, On Evaluating Transportation Impacts in CEQA, Governor's office of Planning and Research, December 2018, pages 11 and 14.

[21] Los Angeles County Public Works, Transportation Impact Analysis Guidelines, July 23, 2020; page 7

Table 1: City of Long Beach Land Use and Urban Design Elements EIR Applicability of Mitigation Measures to Project		
Impact	**Measure**	**Project Impact and Mitigation Applicability**
Utilities		
Less than significant impacts.		
Energy		
Less than significant impacts.		

Table 2: City of Long Beach Downtown Plan Program EIR Applicability of Mitigation Measures to Project		
Impact	**Measure**	**Project Impact and Mitigation Applicability**
AESTHETICS		
Extensive use of glass and reflective materials on building facades could cause light and glare on adjacent properties. (Class II impact)	**AES-2(a)** Lighting Plans and Specifications. Prior to the issuance of building permits for new large development projects, the applicant shall submit lighting plans and specifications for all exterior lighting fixtures and light standards to the Development Services Department for review and approval. The plans shall include a photometric design study demonstrating that all outdoor light fixtures to be installed are designed or located in a manner as to contain the direct rays from the lights onsite and to minimize spillover of light onto surrounding properties or roadways. All parking structure lighting shall be shielded and directed away from residential uses. Rooftop decks and other similar amenities are encouraged in the Plan. Lighting for such features shall be designed so that light is directed so as to provide adequate security and minimal spill-over or nuisance lighting.	Not applicable. Aesthetics is not a potentially significant issue for development adjacent to transit. Also, extensive use of reflective materials is not anticipated, and substantial use of glass is generally no longer allowed by Title 24.
Same as impact as addressed with measure AES-2(a)	**AES-2(b)** Building Material Specifications. Prior to the issuance of any building permits for development projects, applicants shall submit plans and specifications for all building materials to the Development Services Department for review and approval. The Plan provides measures to ensure that the highest quality materials are used for new development projects. This is an important consideration, since high-quality materials last longer. Quality development provides an impression of permanence and can encourage additional private investment in Downtown Long Beach.	Same as AES-2(a)
Same as impact as addressed with measure AES-2(a)	**AES-2(c)** Light Fixture Shielding. Prior to the issuance of building permits for development projects within the Downtown Plan Project area, applicants shall demonstrate to the Development Services Department that all night lighting installed on private property within the project site shall be shielded, directed away from residential and other light-sensitive uses, and confined to the project site. Rooftop lighting, including rooftop decks, security lighting, or aviation warning lights, shall be in accordance with Airport/Federal Aviation Administration (FAA) requirements. Additionally, all lighting shall comply with all applicable Airport Land Use Plan (ALUP) Safety Policies and FAA regulations.	Same as AES-2(a). Nonetheless it is anticipated light fixtures would be shielded.
Same as impact as addressed with measure AES-2(a)	**AES-2(d)** Window Tinting. Prior to the issuance of any building permits, the applicant shall submit plans and specifications showing that building windows are manufactured or tinted to minimize glare from interior lighting and to minimize heat gain in accordance with energy conservation measures.	Same as AES-2(a) Also, the project would comply with the most recent Title 24 which requires much more energy

Table 2: City of Long Beach Downtown Plan Program EIR Applicability of Mitigation Measures to Project

Impact	Measure	Project Impact and Mitigation Applicability
		conservation than when the EIR was certified.
Light and glare, shade (Class I impact)	**AES-3** Shadow Impacts. Prior to the issuance of building permits for any structure exceeding 75 feet in height or any structure that is adjacent to a light sensitive use and exceeds 45 feet in height, the applicant shall submit a shading study that includes calculations of the extent of shadowing arches for winter and equinox conditions. If feasible, projects shall be designed to avoid shading of light sensitive uses in excess of the significance thresholds outlined in this EIR. If avoidance of shadows exceeding significance thresholds is determined to be infeasible, the shadow impact will be disclosed as part of a project environmental impact report (EIR).	Same as AES-2(a). Plus, the building is anticipated to be less than 75 feet.
Air Quality		
Construction and operation emissions – VOC, NOx, PM10 and PM2.5 (Class I impact)	**AQ-1(a)** To reduce short-term construction emissions, the City shall require that all construction projects that would require use of heavy-duty (50 horsepower [hp] or more) off- road vehicles to be used during construction shall require their contractors to implement the Enhanced Exhaust Control Practices (listed below) or whatever mitigation measures are recommended by SCAQMD at the time individual portions of the site undergo construction , including those specified in the mitigation recommendations in the SCAQMD CEQA Handbook or SCAQMD's Mitigation Measures and Control Efficiencies recommendations located at the following url: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Enhanced Exhaust Control Practices • The project applicant shall provide a plan for approval by the City, demonstrating that the heavy-duty (50 hp or more) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project-wide fleet- average 20 percent NOX reduction, 20 percent VOC reduction, and 45 percent particulate reduction compared to the 2011 ARB fleet average, as contained in the URBEMIS output sheets in Appendix C. Acceptable options for reducing emissions may include use of late-model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. SCAQMD, which is the resource agency for air quality in the Project area, can be used in an advisory role to demonstrate fleet-wide reductions SCAQMD's mitigation measures for off-road engines can be used to identify an equipment fleet that achieves this reduction (SCAQMD 2007b). • The project applicant shall submit to the City a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 hp, that would be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the hp rating, engine production year, and projected hours of use for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of heavy-duty off-road equipment, the project representative shall provide the City with the anticipated construction timeline including start date and name and phone number of the project manager and	Not applicable. Evaluation of template projects was undertaken as part of the 2024 RTP/SCS EIR; that analysis shows that high-mid and high-range projects (greater than 160 workers, 19 pieces of heavy equipment and 150 one-way truck trips) and projects greater than an acre would have the potential to result in significant construction impacts. The project would be much smaller than this and would not be expected to generate significant construction emissions.[22] In addition existing regulations reduce emissions as compared to the analyses in the EIR and require appropriate dust control, and limit engine idling.

[22] https://scag.ca.gov/sites/default/files/2024-05/23-3052-peir-2024-draft-3-3-air-quality.pdf; page 3.3-49 and 3.3-65

Table 2: City of Long Beach Downtown Plan Program EIR
Applicability of Mitigation Measures to Project

Impact	Measure	Project Impact and Mitigation Applicability
	onsite foreman. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed and the dates of each survey. SCAQMD staff and/or other officials may conduct periodic site inspections to determine compliance. • If, at the time of construction, SCAQMD, CARB, or the EPA has adopted a regulation or new guidance applicable to construction emissions, compliance with the regulation or new guidance may completely or partially replace this mitigation if it is equal to or more effective than the mitigation contained herein, and if the City so permits. Such a determination must be supported by a project-level analysis and be approved by the City.	
Same as impact as addressed with measure AQ-1(a)	**AQ-1(b)** Prior to construction of each development phase of onsite land uses that are proposed within 1,500 feet of sensitive receptors, each project applicant shall perform a project-level CEQA analysis that includes a detailed LST analysis of construction-generated emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ to assess the impact at nearby sensitive receptors. The LST analysis shall be performed in accordance with applicable SCAQMD guidance that is in place at the time the analysis is performed. The project-level analysis shall incorporate detailed parameters of the construction equipment and activities, including the year during which construction would be performed, as well as the proximity of potentially affected receptors, including receptors proposed by the project that exist at the time the construction activity would occur.	Same AQ-1(a).
Same as impact as addressed with measure AQ-1(a)	**AQ-1(c)** Prior to issuance of a grading permit, the project plans shall include the following provisions to reduce construction-related air quality impacts: - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow; - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site; - Reroute construction trucks away from congested streets or sensitive receptor areas; - Appoint a construction relations officer to act as a community liaison concerning on- site construction activity including resolution of issues related to PM10 generation; - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications; - Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113; - Construct or build with materials that do not require painting; - Require the use of pre-painted construction materials if available; - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export); - During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following: o Project Start, to December 31, 2011: All offroad diesel-powered	Same as AQ-1(a).

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Impact	Measure	Project Impact and Mitigation Applicability
	construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. o January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. o Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment. Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm.	
Same as impact as addressed with measure AQ-1(a)	**AQ-2** Mitigation to reduce mobile source emissions due to implementation of the Plan addresses reducing the number of motor vehicle trips and reducing the emissions of individual vehicles under the control of the project applicant(s). The following measures shall be implemented by project applicant(s) unless it can be demonstrated to the City that the measures would not be feasible. • The project applicant(s) for all project phases shall require the commercial development operator(s) to operate, maintain, and promote a ride-share program for employees of the various businesses. • The project applicant(s) for all project phases shall include one or more secure bicycle parking areas within the property and encourage bicycle riding for both employees and customers. • The proposed structures shall be designed to meet current Title 24 + 20 percent energy efficiency standards and shall include such measures as photovoltaic cells on the rooftops to achieve an additional 25 percent reduction in electricity use on an average sunny day. • The City shall ensure that all new commercial developments include shower and locker facilities for employees to encourage bicycle, walking, and jogging as options for commuting. • The project applicant(s) for all project phases shall require that all equipment operated by the businesses within the facility be electric or	Not applicable. Affordable housing projects generate relatively few trips and would not generate significant emissions.

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Impact	Measure	Project Impact and Mitigation Applicability
	use non-diesel engines. • All truck loading and unloading docks shall be equipped with one 110/208-volt power outlet for every two-dock door. Diesel trucks shall be prohibited from idling more than 5 minutes and must be required to connect to the 110/208-volt power to run any auxiliary equipment. Signs outlining the idling restrictions shall be provided. • If, at the time of construction, SCAQMD, CARB, or EPA has adopted a regulation or new guidance applicable to mobile- and area-source emissions, compliance with the regulation or new guidance may completely or partially replace this mitigation if it is equal to or more effective than the mitigation contained herein, and if the City so permits. Such a determination shall be supported by a project-level analysis that is approved by the City.	
Toxic air contaminants from Port of Long beach, off-site sources and on-site mobile sources exceeding CARB standards for risk. (Class I impact)	**AQ-4(a)** The following measures shall be implemented to reduce exposure of sensitive receptors to operational emissions of TACs: • Proposed commercial land uses that have the potential to emit TACs or host TAC-generating activity (e.g., loading docks) shall be located away from existing and proposed onsite sensitive receptors such that they do not expose sensitive receptors to TAC emissions that exceed an incremental increase of 10 in 1 million for the cancer risk and/or a noncarcinogenic Hazard Index of 1.0. • Where necessary to reduce exposure of sensitive receptors to an incremental increase of 10 in 1 million for the cancer risk and/or a noncarcinogenic Hazard Index of 1.0, proposed commercial and industrial land uses that would host diesel trucks shall incorporate idle-reduction strategies that reduce the main propulsion engine idling time through alternative technologies such as IdleAire, electrification of truck parking, and alternative energy sources for TRUs to allow diesel engines to be completely turned off. • Signs shall be posted in at all loading docks and truck loading areas to indicate that diesel- powered delivery trucks must be shut off when not in use for longer than 5 minutes on the premises. This measure is consistent with the ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling, which was approved by the California Office of Administrative Law in January 2005. • Proposed facilities that would require the long-term use of diesel equipment and heavy-duty trucks shall develop a plan to reduce emissions, which may include such measures as scheduling activities when the residential uses are the least occupied, requiring equipment to be shut off when not in use, and prohibiting heavy trucks from idling. • When determining the exact type of facility that would occupy the proposed commercial space, the City shall take into consideration its toxic-producing potential. • Commercial land uses that accommodate more than 100 trucks per day, or 40 trucks equipped with TRUs, within 1,000 feet of sensitive receptors (e.g., residences or schools) shall perform a site-specific project-level HRA in accordance with SCAQMD guidance for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles (SCAQMD 2003b). If the incremental increase in cancer risk determined by the HRA exceeds the threshold of significance recommended by SCAQMD or ARB at the time (if any), then all feasible mitigation measures shall be employed to minimize the impact.	Not applicable to residential land uses.

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Impact	Measure	Project Impact and Mitigation Applicability
Same as impact as addressed with measure AQ-4(a)	**AQ-4(b)** The City shall verify that the following measures are implemented by new developments to reduce exposure of sensitive receptors to emissions of TACs from POLB and stationary sources in the vicinity of the Downtown Plan Project area: • All proposed residences in the Downtown Plan Project area shall be equipped with filter systems with high Minimum Efficiency Reporting Value (MERV) for removal of small particles (such as 0.3 micron) at all air intake points to the home. All proposed residences shall be constructed with mechanical ventilation systems that would allow occupants to keep windows and doors closed and allow for the introduction of fresh outside air without the requirement of open windows. • The heating, ventilation, and air conditioning (HVAC) systems shall be used to maintain all residential units under positive pressure at all times. • An ongoing education and maintenance plan about the filtration systems associated with HVAC shall be developed and implemented for residences. • To the extent feasible, sensitive receptors shall be located as far away from the POLB as possible.	Not applicable. This is an impact of the environment on the project and therefore not an issue under CEQA.
Same as impact as addressed with measure AQ-4(a)	**AQ-5** The following additional guidelines, which are recommended in ARB's *Land Use Handbook: A Community Health Perspective* (ARB 2005) shall be implemented. The guidelines are considered to be advisory and not regulatory: • Sensitive receptors, such as residential units and daycare centers, shall not be located in the same building as dry-cleaning operations that use perchloroethylene. Dry-cleaning operations that use perchloroethylene shall not be located within 300 feet of any sensitive receptor. A setback of 500 feet shall be provided for operations with two or more machines.	Not applicable. This is an impact of the environment on the project and therefore not an issue under CEQA.
Odors from delivery trucks idling and restaurants. (Class II impact)	**AQ-6** The following mitigation measures shall be implemented to control exposure of sensitive receptors to operational odorous emissions. The City shall ensure that all project applicant(s) implement the following measures: • The City shall consider the odor- producing potential of land uses when reviewing future development proposals and when the exact type of facility that would occupy areas zoned for commercial, industrial, or mixed- use land uses is determined. Facilities that have the potential to emit objectionable odors shall be located as far away as feasible from existing and proposed sensitive receptors. • Before the approval of building permits, odor-control devices shall be identified to mitigate the exposure of receptors to objectionable odors if a potential odor-producing source is to occupy an area zoned for commercial land use. The identified odor-control devices shall be installed before the issuance of certificates of occupancy for the potentially odor- producing use. The odor- producing potential of a source and control devices shall be determined in coordination with SCAQMD and based on the number of complaints associated with existing sources of the same nature. • Truck loading docks and delivery areas shall be located as far away as feasible from existing and proposed sensitive receptors. • Signs shall be posted at all loading docks and truck loading areas to indicate that diesel-powered delivery trucks must be shut off when not in use for longer than 5 minutes on the premises in order to reduce	Not applicable. Affordable housing would not be expected to generate a substantial number of delivery trucks, and no restaurant use is anticipated.

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Impact	Measure	Project Impact and Mitigation Applicability
	idling emissions. This measure is consistent with the ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling, which was approved by California's Office of Administrative Law in January 2005. (This measure is also required by Mitigation Measure AQ-4 to limit TAC emissions.) • Proposed commercial and industrial land uses that have the potential to host diesel trucks shall incorporate idle-reduction strategies that reduce the main propulsion engine idling time through alternative technologies such as, IdleAire, electrification of truck parking, and alternative energy sources for TRUs to allow diesel engines to be completely turned off. (This measure is also required by Mitigation Measure AQ-4 to limit TAC emissions.) In addition, mitigation measures identified under AQ-4(b) to reduce indoor exposure to TACs would also result in a reduction in the intensity of offensive odors from the surrounding odor sources.	
Cultural Resources		
Redevelopment of properties eligible for listing on the National or California historic properties registers or as local landmarks. (Class I impact)	**CR-1(a)** The City shall encourage the designation as local landmarks of 20 properties identified in Table 4.3-3 with the "Desired Outcome" of "Pursue Local Designation." The City will encourage the on-going maintenance and appropriate adaptive reuse of all properties in Table 4.3-2 (existing landmarks), and Table 4.3-3 as historic resources.	Not applicable. There is no building on the site.
Same as impact as addressed with measure CR-1(a)	**CR-1(b)** The following procedures shall be followed prior to issuance of a demolition permit or a building permit for alteration of any property listed in the Historic Survey Report (ICF Jones & Stokes 2009) by Status Code 3S, 3CS, 5S1, or 5S3; designated as a Historic Landmark (City of Long Beach 2010a); listed in Tables 4.3-2 and 4.3-3 of this PEIR, or other property 45 years of age or older that was not previously determined by the Historic Survey Report to be ineligible for National Register, California Register, or Local Landmark (Status Code 6L and 6Z): Notification of Historic Preservation Staff Historic Preservation staff in the City Development Services Department shall be notified upon receipt of any demolition permit or building permit for alteration of any property listed in the Historic Survey Report or other property 45 years of age or older that was not previously determined by the Historic Survey Report to be ineligible for National Register, California Register, or Local Landmark (Status Code 6L and 6Z) Determination of Need for Historic Property Survey In consultation with Historic Preservation staff, the City Development Services Department shall determine whether a formal historic property survey is needed and may require that the owner or applicant provide photographs of the property, including each building façade, with details of windows, siding, eaves, and streetscape views, and copies of the County Assessor and City building records, in order to make this determination. Determination of Eligibility If City Development Services Department staff determines that the property may be eligible for designation, the property shall be referred to the Cultural Heritage Commission, whose determination of eligibility shall be considered as part of the environmental determination for the project in accordance with CEQA.	Not applicable. There is no building on the site.

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Impact	Measure	Project Impact and Mitigation Applicability
	Documentation Program If the Cultural Heritage Commission determines that the property is eligible for historic listing, the City Development Services Department shall, in lieu of preservation, require that prior to demolition or alteration a Documentation Program be prepared to the satisfaction of the City Development Services Department, which shall include the following: 1. Photo Documentation Documentation shall include professional quality photographs of the structure prior to demolition with 35 mm black and white photographs, 4" x 6" standard format, taken of all four elevations and with close-ups of select architectural elements, such as but not limited to, roof/wall junctions, window treatments, decorative hardware, any other elements of the building's exterior or interior, or other property features identified by the City Development Services Department to be documented. Photographs shall be of archival quality and easily reproducible. 2. Required drawings Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings shall be produced in ink on translucent material or archivally stable material (blueline drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36" and standard scale is 1⁄4" = 1 foot. 3. Archival Storage Xerox copies or CD of the photographs and one set of the measured drawings shall be submitted for archival storage with the City Development Services Department; and one set of original photographs, negatives, and measured drawings shall be submitted for archival storage with such other historical repository identified by the City Development Services Department.	
Impacts to archaeological and native American resources. (Class II impact)	**CR-2(a)** A qualified project archaeologist or archaeological monitor approved by the City in advance of any ground-disturbing activities shall be present during excavation into native sediments and shall have the authority to halt excavation for inspection and protection of cultural resources. The archaeological monitor shall be empowered to halt or redirect ground-disturbing activities to allow the find to be evaluated. If the archaeological monitor determines the find to be significant, the project applicant and the City shall be notified and an appropriate treatment plan for the resources shall be prepared. The treatment plan shall include notification of a Native American representative and shall consider whether the resource should be preserved in place or removed to an appropriate repository as identified by the City.	Not applicable. Excavation into native sediments is not anticipated. Site has been previously disturbed. Substantial excavation is not anticipated. Only relatively minor disturbance of subsurface soils anticipated for foundations. Potential drilling of piles as needed.
Same as impact as addressed with measure CR-2(a)	**CR-2(b)** The project archaeologist shall prepare a final report of the find for review and approval by the City and shall include a description of the resources unearthed, if any, treatment of the resources, and evaluation of the resources with respect to the California Register of Historic Resources and the National Register of Historic Places. The report shall be filed with the California Historic Resources Information System South Central Coastal Information	Not applicable. No resources are anticipated.

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	Center. If the resources are found to be significant, a separate report including the results of the recovery and evaluation process shall be prepared.	
Same as impact as addressed with measure CR-2(a)	**CR-2(c)** If human remains are encountered during excavation and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the corner is to notify the Native American Heritage Commission (NAHC) within 24 hours. The NAHC will then identify the person(s) thought to be the Most Likely Descendent, who will help determine what course of action should be taken in dealing with the remains. Preservation in place and project design alternatives shall be considered as possible courses of action by the project applicant, the City, and the Most Likely Descendent.	Required by California law. Project would comply.
Impacts to paleontological resources during construction. (Class II impact)	**CR-3(a)** A qualified paleontologist approved by the City in advance of any ground-disturbing activities shall be present during excavation into native sediments and shall have the authority to halt excavation for inspection and protection of paleontological resources. Monitoring shall consist of visually inspecting fresh exposures of rock for fossil remains and, where appropriate, collection of sediment samples for further analysis. The frequency of inspections shall be based on the rate of excavation and grading activities, the materials being excavated, the depth of excavation, and, if found, the abundance and type of fossils encountered.	Not applicable. Excavation into native sediments is not anticipated (see above of CR-2a).
Same as impact as addressed with measure CR-3(b)	**CR-3(b)** If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect excavation and grading in the area of the exposed fossil to evaluate and, if necessary, salvage the find. All fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected shall be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County and shall be accompanied by a report on the fossils collected and their significance, and notes, maps, and photographs of the salvage effort.	Same as CR-3(a)
Geology		
Seismic groundshaking could damage future structures and risk injury. (Class II impact)	**Geo-1** New construction or structural remodeling of buildings proposed with the Project area shall be engineered to withstand the expected ground acceleration that may occur at the project site. The calculated design base ground motion for each project site shall take into consideration the soil type, potential for liquefaction, and the most current and applicable seismic attenuation methods that are available. All onsite structures shall comply with applicable provisions of the most recent UBC adopted by the City of Long Beach.	Required by California law. (Measure reflects an impact of the environment on the project and therefore not an issue under CEQA.)
Seismically induced liquefaction could cause structural failure and risk injury. (Class II impact)	**Geo-2** Prior to issuance of a building permit for new structures, the City Department of Development Services shall determine, based on building height, depth, and location, whether a comprehensive geotechnical investigation and geo-engineering study shall be completed to adequately assess the liquefaction potential and compaction design of the soils underlying the proposed bottom grade of the structure. If a geotechnical investigation is required, borings shall be completed to at least 50 feet below the lowest proposed finished grade of the structure or 20 feet below the lowest caisson or footing (whichever is deeper). If these soils are confirmed to be prone	Same as Geo-1

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	to seismically induced liquefaction, appropriate techniques to minimize liquefaction potential shall be prescribed and implemented. All onsite structures shall comply with applicable methods of the UBC and California Building Code. Suitable measures to reduce liquefaction impacts could include specialized design of foundations by a structural engineer, removal or treatment of liquefiable soils to reduce the potential for liquefaction, drainage to lower the groundwater table to below the level of liquefiable soils, in-situ densification of soils, or other alterations to the sub-grade characteristics.	
Potential expansive soils may be encountered. (Class II impact)	**Geo-3** Prior to issuance of a building permit for new structures, the City Department of Development Services shall determine the need for soil samples of final sub-grade areas and excavation sidewalls to be collected and analyzed for their expansion index. For areas where the expansion index is found to be greater than 20, grading and foundation designs shall be engineered to withstand the existing conditions. The expansion testing may be omitted if the grading and foundations are engineered to withstand the presence of highly expansive soils.	Same as Geo-1
Greenhouse Gase Emissions		
Emissions of CO2 and other greenhouse gases during construction. (Class I impact)	**GHG-1(a)** Implement Mitigation Measure AQ-1. Implementation of the mitigation measures described in Section 4.2, Air Quality, of this PEIR, which would reduce construction emissions of criteria air pollutants and precursors, would also act to reduce GHG emissions associated with implementation of the Project. The construction mitigation measures for exhaust emissions are relevant to the global climate change impact because both criteria air pollutant and GHG emissions are frequently associated with combustion byproducts.	Not applicable. An affordable housing project adjacent to transit that is required to comply with Title 24, complies with the latest policies at the state and regional level to reduce GHG emissions to an acceptable level.
Same as impact as addressed with measure GHG-1(a)	**GHG-1(b)** Implement Additional Measures to Control Construction-Generated GHG Emissions. To further reduce construction- generated GHG emissions, the project applicant(s) of all public and private developments shall implement all feasible measures for reducing GHG emissions associated with construction that are recommended by the City and/or SCAQMD at the time individual portions of the site undergo construction including those specified in the mitigation recommendations in the SCAQMD CEQA Handbook or SCAQMD's Mitigation Measures and Control Efficiencies recommendations located at the following url: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html. Such measures may reduce GHG exhaust emissions from the use of onsite equipment, worker commute trips, and truck trips carrying materials and equipment to and from the project site, as well as GHG emissions embodied in the materials selected for construction (e.g., concrete). Other measures may pertain to the materials used in construction. Prior to the construction of each development phase, the project applicant(s) shall obtain the most current list of GHG-reduction measures that are recommended by the City and/or SCAQMD and stipulate that these measures be implemented during the appropriate construction phase. The project applicant(s) for any particular development phase may submit to the City a report that substantiates why specific measures are considered infeasible for construction of that particular development phase and/or at that point	Same as GHG-1(a)

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Impact	Measure	Project Impact and Mitigation Applicability
	in time. The report, including the substantiation for not implementing particular GHG- reduction measures, shall be approved by the City. The City's recommended measures for reducing construction-related GHG emissions at the time of writing this PEIR are listed below and the project applicant(s) shall, at a minimum, be required to implement the following: • Improve fuel efficiency from construction equipment: o reduce unnecessary idling (modify work practices, install auxiliary power for driver comfort), o perform equipment maintenance (inspections, detect failures early, corrections), o train equipment operators in proper use of equipment, o use the proper size of equipment for the job, and o use equipment with new technologies (repowered engines, electric drive trains). • Use alternative fuels for electricity generators and welders at construction sites such as propane or solar, or use electrical power. • Use an ARB-approved low-carbon fuel, such as biodiesel or renewable diesel for construction equipment (emissions of NOX from the use of low carbon fuel must be reviewed and increases mitigated). Additional information about low-carbon fuels is available from ARB's Low Carbon Fuel Standard Program (ARB 2010a). • Encourage and provide carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes. • Reduce electricity use in the construction office by using compact fluorescent bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones. • Recycle or salvage non-hazardous construction and demolition debris (goal of at least 75 percent by weight). • Use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials, and based on volume for roadway, parking lot, sidewalk, and curb materials). • Minimize the amount of concrete used for paved surfaces or use a low carbon concrete option. • Produce concrete onsite if determined to be less emissive than transporting ready mix. • Use EPA-certified SmartWay trucks for deliveries and equipment transport. Additional information about the SmartWay Transport Partnership Program is available from ARB's Heavy-Duty Vehicle GHG Measure (ARB 2010b) and EPA (EPA 2010). • Develop a plan to efficiently use water for adequate dust control. This may consist of the use of non-potable water from a local source.	
Emissions of CO2 and other greenhouse gases during operation. (Class I impact)	**GHG-2(a)** Implement Mitigation Measure AQ-3. Implementation of the mitigation measures described in Section 4.2, which would reduce operational emissions of criteria air pollutants and precursors, would also act to reduce GHG emissions associated with implementation of the Project. The operational mitigation measures for exhaust emissions are relevant to the global climate change impact because both criteria air pollutant and GHG emissions are frequently associated with combustion byproducts.	Not applicable. An affordable housing project adjacent to transit that is required to comply with Title 24, complies with the latest policies at the state and regional level to reduce GHG emissions to an acceptable level.
Same as impact as	**GHG-2(b)** Implement Additional Measures to Reduce Operational	Same as GHG-2(a)

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Impact	Measure	Project Impact and Mitigation Applicability
addressed with measure GHG-2(a)	GHG Emissions. For each increment of new development within the Project area requiring a discretionary approval (e.g., tentative subdivision map, conditional use permit, improvement plan), measures that reduce GHG emissions to the extent feasible and to the extent appropriate with respect to the state's progress at the time toward meeting GHG emissions reductions required by the California Global Warming Solutions Act of 2006 (AB 32) shall be imposed, as follows: • The project applicant shall incorporate feasible GHG reduction measures that, in combination with existing and future regulatory measures developed under AB 32, will reduce GHG emissions associated with the operation of future project development phases and supporting roadway and infrastructure improvements by an amount sufficient to achieve the goal of 6.6 CO_2e/SP/year, if it is feasible to do so. The feasibility of potential GHG reduction measures shall be evaluated by the City at the time each phase of development is proposed to allow for ongoing innovations in GHG reduction technologies and incentives created in the regulatory environment. • For each increment of new development, the project applicant shall obtain a list of potentially feasible GHG reduction measures to be considered in the development design from the City. The City's list of potentially feasible GHG reduction measures shall reflect the current state of the regulatory environment, which will continuously evolve under the mandate of AB 32. The project applicant(s) shall then submit to the City a mitigation report that contains an analysis demonstrating which GHG reduction measures are feasible for the associated reduction in GHG emissions, and the resulting CO_2e/SP/year metric. The report shall also demonstrate why measures not selected are considered infeasible. The mitigation report must be reviewed and approved by the City for the project applicant(s) to receive the City's discretionary approval for the applicable increment of development. In determining what measures should appropriately be imposed by a local government under the circumstances, the following factors shall be considered: o The extent to which rates of GHG emissions generated by motor vehicles traveling to, from, and within the Project site are projected to decrease over time as a result of regulations, policies, and/or plans that have already been adopted or may be adopted in the future by ARB or other public agency pursuant to AB 32, or by EPA; o The extent to which mobile- source GHG emissions, which at the time of writing this PEIR comprise a substantial portion of the state's GHG inventory, can also be reduced through design measures that result in trip reductions and reductions in trip length; o The extent to which GHG emissions emitted by the mix of power generation operated by SCE, the electrical utility that will serve the Project site, are projected to decrease pursuant to the Renewables Portfolio Standard required by SB 1078 and SB 107, as well as any future regulations, policies, and/or plans adopted by the federal and state governments that reduce GHG emissions from power generation; o The extent to which replacement of CCR Title 24 with the California Green Building Standards Code or other similar requirements will result in new buildings being more energy efficient and consequently more GHG efficient; o The extent to which any stationary sources of GHG emissions that would be operated on a proposed land use (e.g., industrial) are already	

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Impact	Measure	Project Impact and Mitigation Applicability
	subject to regulations, policies, and/or plans that reduce GHG emissions, particularly any future regulations that will be developed as part of ARB's implementation of AB 32, or other pertinent regulations on stationary sources that have the indirect effect of reducing GHG emissions; o The extent to which the feasibility of existing GHG reduction technologies may change in the future, and to which innovation in GHG reduction technologies will continue, effecting cost-benefit analyses that determine economic feasibility; and o Whether the total costs of proposed mitigation for GHG emissions, together with other mitigation measures required for the proposed development, are so great that a reasonably prudent property owner would not proceed with the project in the face of such costs. • In considering how much, and what kind of, mitigation is necessary in light of these factors, the following list of options shall be considered, though the list is not intended to be exhaustive, as GHG-emission reduction strategies and their respective feasibility are likely to evolve over time. These measures are derived from multiple sources including the Mitigation Measure Summary in Appendix B of the California Air Pollution Control Officer's Association (CAPCOA) white paper, *CEQA & Climate Change* (CAPCOA 2008); CAPCOA's *Model Policies for Greenhouse Gases in General Plans* (CAPCOA 2009); and the California Attorney General's Office publication, The California Environmental Quality Act: Addressing Global Warming Impacts at the Local Agency Level (California Attorney General's Office 2010). **Energy Efficiency** o Include clean alternative energy features to promote energy self-sufficiency (e.g., photovoltaic cells, solar thermal electricity systems, small wind turbines). o Design buildings to meet CEC Tier II requirements (e.g., exceeding the requirements of Title 24 [as of 2007] by 20 percent). o Site buildings to take advantage of shade and prevailing winds and design landscaping and sun screens to reduce energy use. o Install efficient lighting in all buildings (including residential). Also install lighting control systems, where practical. Use daylight as an integral part of lighting systems in all buildings. o Install light-colored "cool" pavements, and strategically located shade trees along all bicycle and pedestrian routes. **Water Conservation and Efficiency** o With the exception of ornamental shade trees, use water-efficient landscapes with native, drought-resistant species in all public area and commercial landscaping. Use water-efficient turf in parks and other turf-dependant spaces. o Install the infrastructure to use reclaimed water for landscape irrigation and/or washing cars. o Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. o Design buildings and lots to be water efficient. Only install water-efficient fixtures and appliances. o Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff. Prohibit businesses from using pressure washers for cleaning driveways, parking lots, sidewalks, and street surfaces. These restrictions should be included in	

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Impact	Measure	Project Impact and Mitigation Applicability
	the Covenants, Conditions, and Restrictions of the community. o Provide education about water conservation and available programs and incentives. o To reduce storm water runoff, which typically bogs down wastewater treatment systems and increases their energy consumption, construct driveways to single-family detached residences and parking lots and driveways of multi-family residential uses, with pervious surfaces. Possible designs include Hollywood drives (two concrete strips with vegetation or aggregate in between) and/or the use of porous concrete, porous asphalt, turf blocks, or pervious pavers. **Solid Waste Measures** o Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). o Provide interior and exterior storage areas for recyclables and green waste at all buildings. o Provide adequate recycling containers in public areas, including parks, school grounds, golf courses, and pedestrian zones in areas of mixed-use development. o Provide education and publicity about reducing waste and available recycling services. **Transportation and Motor Vehicles** o Promote ride-sharing programs and employment centers (e.g., by designating a certain percentage of parking spaces for ride-sharing vehicles, designating adequate passenger loading zones and waiting areas for ride-share vehicles, and providing a website or message board for coordinating ride-sharing). o Provide the necessary facilities and infrastructure in all land use types to encourage the use of low- or zero-emission vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations). o At industrial and commercial land uses, all forklifts, "yard trucks," or vehicles that are predominately used onsite at non-residential land uses shall be electric-powered or powered by biofuels (such as biodiesel [B100]) that are produced from waste products, or shall use other technologies that do not rely on direct fossil fuel consumption.	
Hazards		
Asbestos and lead based paints may be encountered during rehabilitation or demolition of structures. Also impacts to schools from these materials. (Class II impacts)	**Haz-1(a)** Prior to issuance of a demolition or renovation permit, a lead-based paint and asbestos survey shall be performed by a licensed sampling company. The lead-based paint survey shall be prepared for any structures pre- dating 1982; an asbestos survey shall be performed for asbestos- containing insulation for any structure pre-dating 1986; and an asbestos survey shall be performed for asbestos-containing drywall for all structures for which drywall is to be removed. All testing procedures shall follow California and federal protocol. The lead-based paint and asbestos survey report shall quantify the areas of lead-based paint and asbestos- containing materials pursuant to California and federal standards.	Not applicable. No demolition required.
Same as impact as addressed with measure Haz-1(a)	**Haz-1(b)** Prior to any demolition or renovation, onsite structures that contain asbestos must have the asbestos-containing material removed according to proper abatement procedures recommended by the asbestos consultant. All abatement activities shall be in compliance with California and federal OSHA and SCAQMD requirements. Only asbestos trained and certified abatement personnel shall be allowed to	Not applicable. No demolition or renovation required.

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Impact	Measure	Project Impact and Mitigation Applicability
	perform asbestos abatement. All asbestos-containing material removed from onsite structures shall be hauled to a licensed receiving facility and disposed of under proper manifest by a transportation company certified to handle asbestos. Following completion of the asbestos abatement, the asbestos consultant shall provide a report documenting the abatement procedures used, the volume of asbestos-containing material removed, where the material was moved to, and transportation and disposal manifests or dump	
Same as impact as addressed with measure Haz-1(a)	**Haz-1(c)** Prior to the issuance of a permit for the renovation or demolition of any structure, a licensed lead-based paint consultant shall be contracted to evaluate the structure for lead-based paint. If lead- based paint is discovered, it shall be removed according to proper abatement procedures recommended by the consultant. All abatement activities shall be in compliance with California and federal OSHA and SCAQMD requirements. Only lead-based paint trained and certified abatement personnel shall be allowed to perform abatement activities. All lead-based paint removed from these structures shall be hauled and disposed of by a transportation company licensed to transport this type of material. In addition, the material shall be taken to a landfill or receiving facility licensed to accept the waste. Following completion of the lead- based paint abatement, the lead-based paint consultant shall provide a report documenting the abatement procedures used, the volume of lead- based paint removed, where the material was moved to, and transportation and disposal manifests or dump tickets. The abatement report shall be prepared for the property owner or other responsible party, with a copy submitted to the City of Long Beach prior to issuance of a demolition or construction permit.	Same as Haz-1(b)
Historic uses on sites including industrial uses and storage of hydrocarbons, heavy metals and acids may have contaminated soils and/or groundwater. (Class II impact)	**Haz-3(a)** All excavation and demolition projects conducted within the Project area shall be required to prepare a contingency plan to identify appropriate measures to be followed if contaminants are found or suspected or if structural features that could be associated with contaminants or hazardous materials are suspected or discovered. The contingency plan shall identify personnel to be notified, emergency contacts, and a sampling protocol to be implemented. The excavation and demolition contractors shall be made aware of the possibility of encountering unknown hazardous materials and shall be provided with appropriate contact and notification information. The contingency plan shall include a provision stating under what circumstances it would be safe to continue with the excavation or demolition, and shall identify the person authorized to make that determination.	A Phase I and II evaluation has been prepared. The County will comply with the recommendations of the Phase II report.
Same as impact as addressed with measure Haz-3(a)	**Haz-3(b)** If contaminants are detected, the results of the soil sampling shall be forwarded to the appropriate local regulatory agency (Long Beach/Signal Hill Certified Unified Program Agency [CUPA], LARWQCB, or the state DTSC). Prior to any other ground disturbing activities at the site, the regulatory agency shall have reviewed the data and signed off on the property or such additional investigation or remedial activities that are deemed necessary have been completed and regulatory agency approval has been received.	Same as Haz-3(a)
Same as impact as addressed with measure Haz-3(a)	**Haz-3(c)** If concentrations of contaminants warrant site remediation, contaminated materials shall be remediated either prior to construction of structures or concurrent with construction. The contaminated materials shall be remediated under the supervision of an environmental consultant licensed to oversee such remediation. The	Same as Haz-3(a)

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Impact	Measure	Project Impact and Mitigation Applicability
	remediation program shall also be approved by a regulatory oversight agency (Long Beach/Signal Hill CUPA, LARWQCB, or the state DTSC). All proper waste handling and disposal procedures shall be followed. Upon completion of the remediation, the environmental consultant shall prepare a report summarizing the project, the remediation approach implemented, the analytical results after completion of the remediation, and all waste disposal or treatment manifests.	
Same as impact as addressed with measure Haz-3(a)	**Haz-3(d)** If during the soil sampling, groundwater contamination is suspected or soil contamination is detected at depths at which groundwater could be encountered during demolition or construction, a groundwater sampling assessment shall be performed. If contaminants are detected in groundwater at levels that exceed maximum contaminant levels for those constituents in drinking water, or if the contaminants exceed health risk standards such as Preliminary Remediation Goals, 1 in 1 million cancer risk, or a health risk index above 1, the results of the groundwater sampling shall be forwarded to the appropriate regulatory agency (Long Beach/Signal Hill CUPA, LARWQCB, or the State DTSC). Prior to any other ground-disturbing activities at the site, the regulatory agency shall have reviewed the data and signed off on the property or such additional investigation or remedial activities that are deemed necessary have been completed and regulatory agency approval has been received.	Same as Haz-3(c)
Hydrology		
Urban pollutants could be discharged during construction and from operation of some projects. (Class II impact)	**Hydro-1** Prior to issuance of a grading permit, the City Department of Development Services shall determine the need for the developer to prepare a SWPPP for the site. If required, the SWPPP shall be submitted for review and approval by the Department of Development Services prior to the issuance of any grading or building permits. The SWPPP shall fully comply with City and LARWQCB requirements and shall contain specific BMPs to be implemented during project construction to reduce erosion and sedimentation to the maximum extent practicable. The following BMPs or equivalent measures to control pollutant runoff shall be included within the project's grading and construction plans, if applicable: Pollutant Escape: Deterrence • Cover all storage areas, including soil piles, fuel and chemical depots. Protect from rain and wind with plastic sheets and temporary roofs. • Implement tracking controls to reduce the tracking of sediment and debris from the construction site. At a minimum, entrances and exits shall be inspected daily and controls implemented as needed. • Implement street sweeping and vacuuming as needed and as required. Pollutant Containment Areas • Locate all construction-related equipment and related processes that contain or generate pollutants (i.e., fuel, lubricants, solvents, cement dust, and slurry) in isolated areas with proper protection from escape. • Locate construction-related equipment and processes that contain or generate pollutants in secure areas, away from storm drains and gutters. • Place construction-related equipment and processes that contain or generate pollutants in bermed and plastic-lined depressions to contain all materials within that site in the event of accidental release or spill.	Required by California law. The County will comply with applicable regulations with respect to preparing a SWPPP.

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Impact	Measure	Project Impact and Mitigation Applicability
	• Park, fuel, and clean all vehicles and equipment in one designated, contained area. Pollutant Detainment Methods • Protect downstream drainages from escaping pollutants by capturing materials carried in runoff and preventing transport from the site. Examples of detainment methods that retard movement of water and separate sediment and other contaminants are silt fences, hay bales, sand bags, berms, and silt and debris basins. Recycling/Disposal • Develop a protocol for maintaining a clean site. This includes proper recycling of construction-related materials and equipment fluids (i.e., concrete dust, cutting slurry, motor oil, and lubricants). • Provide disposal facilities. Develop a protocol for cleanup and disposal of small construction wastes (i.e., dry concrete). Hazardous Materials Identification and Response • Develop a protocol for identifying risk operations and materials. Include protocol for identifying source and distribution of spilled materials. • Provide a protocol for proper clean-up of equipment and construction materials, and disposal of spilled substances and associated cleanup materials. • Provide an emergency response plan that includes contingencies for assembling response teams and immediately notifying appropriate agencies.	
Same as impact as addressed with measure Hydro-1	**Hydro-2** Prior to issuance of a building permit, the Department of Development Services shall determine the need for the developer to prepare a SUSMP for the site. If required, the SUSMP shall be submitted for review and approval by the Department of Development Services prior to the issuance of any building permits. The City's review shall include a determination of whether installation of pollutant removal technology in existing or proposed storm drains adjacent to the project site should be required. The City's review is required to confirm that the SUSMP is consistent with the City's NPDES Permit No. CAS 004003 or a subsequently issued NPDES permit applicable at the time of project construction. A SUSMP consistent with the City's NPDES permit shall be incorporated into the project design plans prior to issuance of any building permits.	The County will comply with applicable regulations with respect to preparing a SUSMP.
Increased intensity of future land uses could exceed storm drain capacities. (Class II impact)	**Hydro-3** Prior to issuance of a building permit, the City Stormwater Management Division shall determine the need for the developer to conduct an analysis of the existing stormwater drainage system and to identify improvements needed to accommodate any projected increased runoff that would result from the proposed Project. The evaluation conducted by the developer shall include a determination of whether Low Impact Development (LID) practices and strategies should be incorporated into the project to reduce post- development peak stormwater runoff discharge rates to not exceed the estimated pre-development discharge rates.	Project has been paved in the past and would not substantially increase storm drain requirements. The County will incorporate LID requirements as appropriate.
Noise		
Construction noise could subject nearby residents to excessive noise. (Class II impact)	**Noise-1(a)** The following measures shall be applied to proposed construction projects that are determined to have potential noise impacts from removal of existing pavement and structures, site grading and excavation, pile driving, building framing, and concrete pours and paving: • All internal combustion-engine- driven equipment shall be equipped	Not applicable. Construction noise would be similar to all urban construction projects. Standard noise abatement measures would be

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Impact	Measure	Project Impact and Mitigation Applicability
	with mufflers that are in good operating condition and appropriate for the equipment. • "Quiet" models of air compressors and other stationary construction equipment shall be employed where such technology exists. • Stationary noise-generating equipment shall be located as far as reasonable from sensitive receptors when sensitive receptors adjoin or are within 150 feet of a construction site. • Unnecessary idling of internal combustion engines (i.e., in excess of 5 minutes) shall be prohibited. • Foundation pile holes shall be predrilled, as feasible based on geologic conditions, to minimize the number of impacts required to seat the pile. • Construction-related traffic shall be routed along major roadways and away from noise-sensitive receptors. • Construction activities, including the loading and unloading of materials and truck movements, shall be limited to the hours specified in the City Noise Ordinance (Section 8.80.202). • Businesses, residences, and noise-sensitive land uses within 150 feet of construction sites shall be notified of the construction. The notification shall describe the activities anticipated, provide dates and hours, and provide contact information with a description of the complaint and response procedure. • Each project implemented as part of the Plan shall designate a "construction liaison" that would be responsible for responding to any local complaints about construction noise. The liaison would determine the cause of the noise complaints (e.g., starting too early, bad muffler, etc.) and institute reasonable measures to correct the problem. A telephone number for the liaison shall be conspicuously posted at the construction site. • If two or more noise complaints are registered, the liaison, or project representative, shall retain a City- approved noise consultant to conduct noise measurements at the location that registered the complaint. The noise measurements shall be conducted for a minimum of 1 hour and shall include 1-minute intervals. The consultant shall prepare a letter report summarizing the measurements and potential measures to reduce noise levels to the maximum extent feasible. The letter report shall include all measurement and calculation data used in determining impacts and resolutions. The letter report shall be provided to code enforcement for determining the adequacy and if the recommendations are adequate.	undertaken including many of the measures bullet points identified in the EIR. See discussion of construction noise in above table.
Same as impact as addressed with measure Noise-1(a)	**Noise-1(b)** The City will require the following measures, where applicable based on noise level of source, proximity of receptors, and presence of intervening structures, to be incorporated into contract specifications for construction projects within 300 feet of existing noise-sensitive land uses (including but not limited to residences, schools, hospitals/nursing homes, churches, and parks) implemented under the proposed Plan: • Temporary noise barriers shall be constructed around construction sites adjacent to, or within 150 feet of, operational business, residences, or other noise- sensitive land uses. Temporary noise barriers shall be constructed of material with a minimum weight of 4 pounds per square foot with no gaps or perforations. Noise barriers may be constructed of, but are not limited to, 5/8-inch plywood, 5/8-inch oriented strand board, or hay bales.	Same as for measure Noise 1(a).

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Impact	Measure	Project Impact and Mitigation Applicability
	• If a project-specific noise analysis determines that the barriers described above would not be sufficient to avoid a significant construction noise impact, a temporary sound control blanket barrier, shall be erected along building façades facing construction sites. This mitigation would only be necessary if conflicts occurred that were irresolvable by proper scheduling and other means of noise control were unavailable. The sound blankets are required to have a minimum breaking and tear strength of 120 pounds and 30 pounds, respectively. The sound blankets shall have a minimum sound transmission classification of 27 and noise reduction coefficient of 0.70. The sound blankets shall be of sufficient length to extend from the top of the building and drape on the ground or be sealed at the ground. The sound blankets shall have a minimum overlap of 2 inches.	
Construction vibration such as pile driving. (Class I impact)	**Noise-2(a)** The City shall review all construction projects for potential vibration-generating activities from demolition, excavation, pile–driving, and construction within 100 feet of existing structures and shall require site-specific vibration studies to be conducted to determine the area of impact and to identify appropriate mitigation measures. The studies shall, at a minimum, include the following: • Identification of the project's vibration compaction activities, pile driving, and other vibration- generating activities that have the potential to generate ground-borne vibration; and the sensitivity of nearby structures to ground-borne vibration. This task should be conducted by a qualified structural engineer. • A vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted; establish a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies shall be identified for actions to be taken when vibration levels approached the defined vibration limits. • Maintain a monitoring log of vibrations during initial demolition activities and during pile driving activities. Monitoring results may indicate the need for a more or less intensive measurement schedule. • Vibration levels limits for suspension of construction activities and implementation of contingencies to either lower vibration levels or secure the affected structures. • Post-construction survey on structures where either monitoring has indicated high vibration levels or complaints of damage have been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.	Not applicable. Pile driving is not anticipated. (If piles were needed they would be drilled.) Standard best management practices urban construction vibration abatement measures will be undertaken as needed to protect adjacent structures. Construction vibration would be similar to other urban construction projects. See discussion of construction noise in table above.
Same as impact as addressed with measure Noise-2(a)	**Noise 2(b)** Any construction activity that generates vibration exceeding the "vibration perception threshold" as specified in Municipal Code Section 8.80.200 at any school shall be scheduled at a time when school is not in session.	Not applicable. The site is not in proximity to a school.
Plan would allow residences in areas where traffic noise already exceeds acceptable standards. (Class II impact)	**Noise-5** In areas where new residential development would be exposed than L_{dn} of greater than 65 dBA, the City will require site-specific noise studies prior to issuance of building permits to determine the area of impact and to present appropriate mitigation measures, which may include, but are not limited to the following: • Utilize site planning to minimize noise in shared residential outdoor activity areas by locating the areas behind the buildings or in courtyards, or orienting the terraces to alleyways rather than streets, whenever possible.	Not applicable. This measure addresses impacts of the environment on a project which is no longer considered an impact under CEQA.

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Impact	Measure	Project Impact and Mitigation Applicability
	• Provide mechanical ventilation in all residential units proposed along roadways or in areas where noise levels could exceed 65 dBA L_{dn} so that windows can remain closed at the choice of the occupants to maintain interior noise levels below 45 dBA L_{dn}. • Install sound-rated windows and construction methods to provide the requisite noise control for residential units proposed along roadways or in areas where noise levels could exceed 70 dBA L_{dn}	
Development of new residences near stationary noise sources could subject residents to excessive noise. (Class II impact)	**Noise-6** In areas where new residential development would be located adjacent to commercial uses, the City will require site-specific noise studies prior to issuance of building permits to determine the area of impact and to present appropriate mitigation measures, which may include, but are not limited to the following: • Require the placement of loading and unloading areas so that commercial buildings shield nearby residential land uses from noise generated by loading dock and delivery activities. If necessary, additional sound barriers shall be constructed on the commercial sites to protect nearby noise sensitive uses. • Require the placement of all commercial HVAC machinery to be placed within mechanical equipment rooms wherever possible. • Require the provision of localized noise barriers or rooftop parapets around HVAC, cooling towers, and mechanical equipment so that line-of-sight to the noise source from the property line of the noise sensitive receptors is blocked.	Same as Noise-5
Population		
Substantial population growth (Class I impact)	No mitigation identified.	Provision of affordable housing is necessary to address homelessness.
Displace existing housing (Class I impact)		No housing would be displaced by the project.
Public Services -- Parks		
Demand for parkland (Class I impact)	Payment of fees would not allow for sufficient provision of parkland.	Project would pay fees as appropriate and include some on-site amenities.
Traffic		
Substantial increase in traffic relative to existing traffic and capacity of street system (Class I impact)	**Traf-1(a)** As the system's capacity is reached, it will become important to manage the street system in a more efficient and coordinated manner. Improvements to the Project area transportation system are proposed as part of the overall Downtown development, including improvements that have been required of other area projects previously approved by the City. Therefore, the mitigation focuses on improvements that would not require significant additional rights-of-way and are achievable within the life of the Plan. There are five proposed mitigation measures for the Downtown Plan, as follows: 1. Implement traffic control system improvements in Downtown on selected arterials. 2. Improve the Alamitos Avenue corridor via removal of	The project is located within a Transit Priority Area (TPA).[23] OPR recommends presuming projects within 0.5 miles of transit and residential development that is 100 percent affordable be assessed as having a less than significant transportation impact.[24] The County's

[23] A Transit Priority Area is an area within one-half mile of a major transit stop that is existing or planned. Section 21064.3 of the Public Resources Code (PRC) defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

[24] Technical Advisory, On Evaluating Transportation Impacts in CEQA, Governor's office of Planning and Research, December 2018, pages 11 and 14.

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Impact	Measure	Project Impact and Mitigation Applicability
	selected parking spaces and the implementation of additional travel lanes plus bike lanes in each direction. 3. Reconfigure the 6th Street and 7th Street intersections with Martin Luther King Avenue and Alamitos Avenue for safety and traffic flow enhancements. 4. Enhance freeway access to I-710 to and from Downtown Long Beach. 5. Implement transit facilities and programs to encourage public transit usage and Transportation Demand Management Policies.	Transportation Impact Analysis Guidelines indicate that projects with 100% of the units (excluding the manager's unit) set aside for lower income households need not undertake further analysis.[25] Therefore, as an affordable housing project, traffic impacts are considered to be less than significant. (Impacts with respect to delay are no longer considered significant. Traffic impacts are measured based on Vehicle Miles Travelled (VMT)).
Same as impact as addressed with measure Traf-1(b)	**Traf-1(b)** A series of traffic signal system improvements are recommended in Downtown to accommodate the anticipated growth in travel. The following traffic signal system improvements are recommended as part of this mitigation measure: 1. Implement Adaptive Traffic Signal Control System (ATCS) improvements throughout Downtown consistent with currently planned improvements on Ocean Boulevard and Atlantic Avenue. Streets that are proposed to be included in the ATCS as a mitigation measure for the Downtown Long Beach Strategic Plan include the following: • Alamitos Avenue north of Ocean Boulevard • Pine Avenue north of Ocean Boulevard • Pacific Avenue north of Ocean Boulevard • 7th Street from I-710 to Alamitos Avenue • 6th Street from I-710 to Alamitos Avenue • Broadway from I-710 to Alamitos Avenue • Ocean Boulevard from Shoreline to Alamitos Avenue (to join the proposed system starting at Alamitos Avenue) • Others as needed, to be determined by the City Traffic Engineer and Public Works Director 2. Implement pan/tilt/zoom Closed Circuit Television Camera (CCTV) surveillance and communications with power and control capability to the Department of Public Works to monitor real-time traffic operations from rooftops of selected new buildings as needed and to be determined based on the location of appropriate new high-rise structures along the Alamitos Avenue, Shoreline Drive, and Ocean Boulevard corridors. 3. Implement transit signal priority for Long Beach Boulevard and upgrade traffic signal system equipment and operations along the Blue Line light rail route. 4. Upgrade and improve traffic signal equipment throughout Downtown for safety and operational enhancements.	Same as Traf-1(a).

[25] Los Angeles County Public Works, Transportation Impact Analysis Guidelines, July 23, 2020; page 7

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Impact	Measure	Project Impact and Mitigation Applicability
Same as impact as addressed with measure Traf-1(b)	**Traf-1(c)** As part of this mitigation measure, a number of intersections would receive major or minor signal modifications, depending on their current status. In addition to the enhancements listed, other potential improvements that can be included are: • Bicycle improvements (detection, signalization, etc.) • In-pavement LED crosswalk lights • Automatic pedestrian detection (i.e., infrared, microwave, or video detection) • Illuminated push buttons • Countdown pedestrian signals • Adaptive pedestrian clearance (increasing the flashing DON'T WALK time based on location of pedestrians in the crosswalk) • Enhanced signal equipment including mast arms, poles, signal heads, and other necessary enhancements for safety and operations • Communications enhancements as needed to tie the system together with the Traffic Control Center in City Hall	Same as Traf-1(a).
Same as impact as addressed with measure Traf-1(b)	**Traf-1(d)** Traffic Calming and Pedestrian Amenities. Appropriate traffic calming and pedestrian amenities shall be provided in conjunction with development projects. Potential improvements include corner curb extensions, enhanced paving of crosswalks, and pedestrian-activated signals at mid- block crossings to make it easier for pedestrians to cross the street and to make them more visible to motorists. Other potential improvements include wider sidewalks in locations where the existing sidewalks are less than 10 feet wide, pedestrian-scale street lights, and street furniture (City of Long Beach 2005).	Same as Traf-1(a)
Impacts to Congestion management Plan intersections. (Class I impact)	**Traf-1(e)** Currently, due to on-street parking, there is only one lane of travel on Alamitos Avenue in the southbound direction between 3rd Street and Broadway. Parking spaces on the west side of Alamitos Avenue will be removed, the street will be restriped and reconstructed, a bike lane will be added in each direction of travel, and the street will provide for two travel lanes in each direction plus exclusive left turn lanes from 7th Street to Ocean Boulevard. Traffic signal enhancements to implement the Alamitos Avenue improvements shall also be implemented as needed.	Same as Traf-1(a)
Same as impact as addressed with measure Traf-1(e) (Class I impact)	**Traft-1(f)** Developments in the project area will be required to coordinate with area transit providers to accommodate and encourage transit use by residents and patrons. For non-residential sites, appropriate programs and facilities will be included to encourage car and van pooling, provide information on transportation alternatives, and encourage trip reduction strategies in accordance with the City's TDM policies for non-residential development.	Same as Traf-1(a).
Increase of more than 2% at Congestion management Program intersections of Alamitos Avenue and 7th Street and with Ocean Avenue. (Class I impact)	No feasible physical measures at intersections.	Same as Traf-1(a).
Utilities		
Cumulative solid waste generation. (Class I impact)	Recycling regulations address solid waste generation. Precise solution for landfills unknown.	Project size is small and would not represent a cumulatively considerable contribution to solid waste.

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Impact	Measure	Project Impact and Mitigation Applicability
Adequate capacity exists within identified landfills, but mitigation identified to reduce volume. (Class II impact)	**Utilities-3(a)** All construction related to Project implementation shall include verification by the construction contractor that all companies providing waste disposal services recycle all demolition and construction-related wastes. The contract specifying recycled waste service shall be submitted to the City Building Official prior to approval of the certificate of occupancy.	This measure reflects California law. County would comply.
Same as impact as addressed with measure Haz-3(a)	**Utilities-3(b)** In order to facilitate onsite separation and recycling of construction related wastes, all construction contractors shall provide temporary waste separation bins onsite during demolition and construction.	Same as Utilities-3(a).
Same as impact as addressed with measure Haz-3(a)	**Utilities-3(c)** All future developments in the Project area shall include recycling bins at appropriate locations to promote recycling of paper, metal, glass, and all other recyclable materials. Materials from these bins shall be collected on a regular basis consistent with the City's refuse disposal program.	Same as Utilities-3(a).
Same as impact as addressed with measure Haz-3(a)	**Utilities-3(d)** All Project area residents and commercial tenants shall be provided with educational materials on the proper management and disposal of household hazardous waste, in accordance with educational materials made available by the Los Angeles County Department of Public Works.	Same as Utilities-3(a).

Community Plan [CEQA section 21083.3(e)]

This exemption is based on the projects consistency with the Land use Element and Urban Design Elements and the Downtown Plan. The project does not require re-zoning.

Public Hearing [CEQA section 21083.3(f)]

The County Board of Supervisors will make a finding regarding mitigation measures from the prior EIRs are not to be undertaken because no significant impacts are anticipated. The project approval action will be placed on a public meeting agenda of the Board of Supervisors.

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.

Attachment

Attachment A – Emergency Documentation Background

Los Angeles County Homeless Emergency

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Revised September 2025

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. Recently, Los Angeles County has had the highest number of homeless residents in the United States.[1]

In general, in the United States, there are an increasing number of people experiencing homelessness (PEH), including an increasing number who have jobs. Inflation, unaffordable housing, medical debt as well as substance abuse and mental health issues are pushing more people into homelessness.[2]

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%).[2] Los Angeles County specifically is home to more than 40% of unhoused Californians, based on point-in-time data.[3] 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 PEH 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 PEH slightly decreased from 2023 (in 2024 there were 75,312 people experiencing homelessness in the County and 45,252 homeless in the City of Los Angeles).[4,5] In 2025 the overall homeless count was 72,308 countywide and 43,699 in the City of Los Angeles; countywide unsheltered homelessness decreased 9.5% while sheltered homelessness increased 8.5% (City of Los Angeles unsheltered homelessness decreased 7.9% and sheltered homelessness increased 4.7%).[6] **Table 1** shows the demographic breakdown of PEH in Greater Los Angeles County 2014 to 2023 (including Pasadena, Long Beach and Glendale).

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1 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

2 "More of America's homeless are clocking into jobs each day," Washington Post, July 29, 2024.

3 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/

4 https://www.lahsa.org/documents?id=8170-los-angeles-county-hc2024-data-summary

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

6 https://www.lahsa.org/news?article=1044-declining-homelessness-is-now-a-trend-in-los-angeles-county

Table 1: Size and Characteristics of LA County PEH Population 2015 to 2023

Year[1]	2015	2016	2017	2018	2019	2020	2021[2]	2022	2023
Total Count[3]	44,359	46,874	55,048	52,765	58,936	66,436	67,790	69,144	75,518
Gender									
Male (incl. trans.)	66%	66%	68%	68%	68%	67%	66.5%	66%	68%
Female (incl. trans.)	33%	33%	32%	31%	31%	32%	32.5%	33%	31%
Age Group[4]									
<18	10%	8%	9%	9%	9%				
18-24	8%	8%	6%	6%	6%				
25-54	57%	60%	61%	59%	61%				
55-61	17%	16%	16%	16%	15%				
62+	8%	9%	8%	10%	9%				
<18						12%	11%	10%	
18-29						15%	14%	13%	
30-39						20%	22%	24%	
40-49						19%	19%	20%	
50-59						22%	21%	20%	
60-69						11%	11%	11%	
70+						2%	2%	3%	
<18									9%
18-24									5%
25-34									19%
35-44									23%
45-54									19%
55-64									18%
65-69									4.2%
70+									2%
Race/Ethnicity									
American Indian/ Alaska Native	3%	3%	1%	1%	2%	1%	1%	1%	1%
Asian	2%	2%	1%	1%	2%	1%	1%	1%	2%
Black	39%	39%	40%	36%	33%	34%	32%	30%	32%
Latino/x	27%	27%	35%	35%	36%	36%	40%	44%	43%
Native Hawaiian/ Other Pacific Islander	.2%	.2%	.3%	.4%	.6%	.3%	.3%	.2%	.5%
White	25%	25%	20%	25%	25%	25%	23%	21%	19%
Multi-racial	5%	5%	2%	1%	2%	2%	2.5%	3%	3%
Shelter Status									
Unsheltered	70%	75%	73%	75%	75%	72%	71%	70%	73%
Sheltered	30%	25%	27%	25%	25%	28%	29%	30%	27%
Chronic Homelessness[5]									
Chronically Homeless	34%	31%	31%	27%	28%	38%	39.5%	41%	45%

1 Point in time counts (for total counts) and demographic surveys (for demographic data) were conducted in late January of the year indicated.
2 Since the point in time count and demographic survey were not conducted in 2021 due to the Covid-19 pandemic, 2021 estimates were calculated by averaging the values for 2020 and 2022.
3 Total count data are for all of LA County. Demographic estimates are for the LA CoC only, which excludes Glendale, Pasadena and Long Beach. Percentages do not always add to 100% due to rounding. Source: https://www.lahsa.org/homeless-count/
4 Available age groupings for age data have changed over the years. beginning in 2020, 10-year age grouping became available, which allowed for more precise age adjustment of mortality rates.
5 Chronic homelessness is defined as homelessness of at least 12 months duration (continuous, or at least four separate occasions in the last three years that add up to 12 months), and presence of a qualifying disability.
SOURCE: Mortality Rates and Causes of Death Among People Experiencing Homelessness in Los Angeles County 2014 – 2022, County of Los Angeles Public Health, May 2024.

The recent reductions in unsheltered counts reflect the success of encampment resolution programs, such as Inside Safe and Pathway Home, which bring people inside rapidly. Since their inception, the two signature programs have combined to place 6,317 people in interim housing and have permanently housed 1,449 people. Additionally, the number of permanent housing placements reached an all-time high of nearly 27,994 in 2024, representing a 2.5% increase from the previous year. This resulted, in part, from the 2,960 permanent supportive housing units created in 2024 — many of which were made possible by Prop HHH. This record performance has pushed the total number of housing placements since 2017 over 125,000. Other innovations include Master Leasing, active system management, and key policy changes that enable more people to obtain the necessary documents to secure housing. These changes contributed to a 23.5% increase in the number of people transitioning from interim housing to permanent housing, totaling 11,146 individuals.[7]

According to the January 2023 Point-in-Time Count there were 71,320 PEH in Los Angeles County Continuum of Care (which excludes Glendale – 195 PEH in 2023 and 179 in 2024[8], Long Beach – 3,447 PEH in 2023 and 3,376 in 2024[9], and Pasadena – 556 PEH in both 2023 and 2024[10]) including both those who are unsheltered (52,307) and those residing in temporary shelters.[11] According to the Los Angeles Homeless Services Authority (LAHSA), as of October 2023, within the Lo Angeles County Continuum of Care, there were[12]:

- 484 sites with a total of 17,010 beds available (including shelter beds and other forms of interim housing) within the Los Angeles County Continuum of Care. This number did not include project Homekey (PHK) sites (added since 2021) operating as interim housing that included 24 sites with 1,922 beds which brings the total to 18,932 beds as 526 locations.
- As of October 2023, 18 sites (661 beds) were in the pipeline, including PHK brings the total to 24 sites and 1,101 beds in the pipeline.
- LAHSA reports that there are 374 sites with 14,272 beds (including PHK) that provide supportive housing (over 90% of which were identified as targeted to single individuals).
- As of October 2023, there were an additional 196 sites (including PHK) with 10,454 beds in the pipeline.
- In addition to shelters and supportive housing, LAHSA identifies 22 Safe Parking sites with 494 spaces.
- In addition to these resources the Winter Shelter Program (WSP) and Augmented Winter Shelter Program (AWSP) provides shelter and meals November 1 through March 31 at six sites with a total of 264 beds.
- In addition to the site-based interim housing programs for families experiencing homelessness, there were approximately 453 motel or hotel vouchers Countywide that enable families to access motels or hotels as short-term interim housing. (The total number of vouchers reflects an availability of resources at any point in Fiscal Year 2022-23. The actual number of used vouchers may fluctuate pending actual need on a day-to-day basis.)

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7 https://www.lahsa.org/news?article=1044-declining-homelessness-is-now-a-trend-in-los-angeles-county
8 https://www.glendaleca.gov/government/departments/community-services-parks/human-services/homeless-services/homeless-count-archive
9 https://www.pasadenahomelesscount.org
10 https://www.pasadenahomelesscount.org
11 https://storymaps.arcgis.com/stories/400d7b75f18747c4ae1ad22d662781a3
12 Ibid.

In addition, Long Beach (the City of Long Beach and its partners) provides approximately 1,300 beds, Pasadena has approximately 235 shelter beds[13], and Glendale provides about 100 shelter beds.[14]

In a December 2023 audit, the City of Los Angeles estimated the number of PEH (46,260) exceeded the number of interim housing beds (16,100) by nearly three times.[15]

Countywide, the number of available beds falls far short of the demand placed on the system by the estimated excess of 75,000 PEH (representing slightly less than one percent [0.78%] of the overall population of Los Angeles County).[16] The scale of the crisis is hard to understand. If the PEH were a separate City, it would be the 31st largest (out of 159) falling between Bellflower and Lakewood.[17]

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.

To address the large number of PEH, on December 12, 2022, the City of Los Angeles, through it's mayor, Karen Bass, declared a state of emergency on homelessness.[18] 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.[19] 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.

On July 25, 2024 Governor Newsom, following a recent US Supreme Court decision (Grants Pass[20]), issued an Executive Order (EO N-1-24[21,22]) ordering state agencies and departments to adopt clear policies that urgently address homeless encampments while respecting the dignity and well-being of all Californians.[23] This EO directs state agencies to move urgently to address dangerous encampments while supporting and assisting the individuals living in them — and provides guidance for cities and counties to do the same. It is not yet clear how this order will affect Los Angeles County and whether it will place increased demands on the existing shelter beds, but it remains true that there is a substantial deficit in the number of shelter beds (tens of thousands) to currently house the PEH in Los Angeles County. There remains a shelter crisis and significant homeless emergency that could be exacerbated by this EO.

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13 https://www.pasadenahomelesscount.org/_files/ugd/a904d1_a4c7ca8e9c82413bb1e0ad50cca8df05.pdf
14 https://www.glendaleca.gov/home/showpublisheddocument/75630/638568316821530000
15 https://controller.lacity.gov/landings/interim-housing-audit
16 https://worldpopulationreview.com/us-counties/ca/los-angeles-county-population
17 https://worldpopulationreview.com/us-counties/ca/los-angeles-county/cities
18 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)
19 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
20 https://www.supremecourt.gov/opinions/23pdf/23-175_19m2.pdf
21 https://www.gov.ca.gov/2024/07/25/governor-newsom-orders-state-agencies-to-address-encampments-in-their-communities-with-urgency-and-dignity/
22 https://www.gov.ca.gov/wp-content/uploads/2024/07/2024-Encampments-EO-7-24.pdf
23 https://www.gov.ca.gov/2024/07/25/governor-newsom-orders-state-agencies-to-address-encampments-in-their-communities-with-urgency-and-dignity/

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. Over the past eight years, the mortality rate among PEH has increased approximately 30% faster than the total population of PEH. Nevertheless, this mortality trend has varied from year to year, and 2022 was marked by a welcomed plateauing of the all-cause mortality rate, which increased by only 2% from 2021, after a devastating increase of 56% from 2019 to 2021. This steep increase, along with the plateau that followed was driven primarily by the rate of drug overdose deaths, mostly from the synthetic opioid fentanyl. [24]

In 2023, there were a total of 900 deaths of unhoused people in the City of Los Angeles[25]:

- 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 characteristics. 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.[26] The ongoing health risks facing the homeless is an emergency 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.

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.[27]

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24 Mortality Rates and Causes of Death Among People Experiencing Homelessness in Los Angeles County 2014 – 2022, County of Los Angeles Public Health, May 2024.

25 This dataset was obtained from the LA County Medical-Examiner Coroner 2023.

26 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

27 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* .

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 Los Angeles County in calendar year 2020, represented a sharp (40%) increase from 2019 (see **Table 2** below) and 56% between 2019 and 2021. From 2021 to 2022, the most recent years of data available, the overall mortality rate increased by just 2% from 3,215 per 100,000 people to 3,282 per 100,000 people. **Figure 2** shows how cause-specific mortality has changed 2014 to 2022[28].

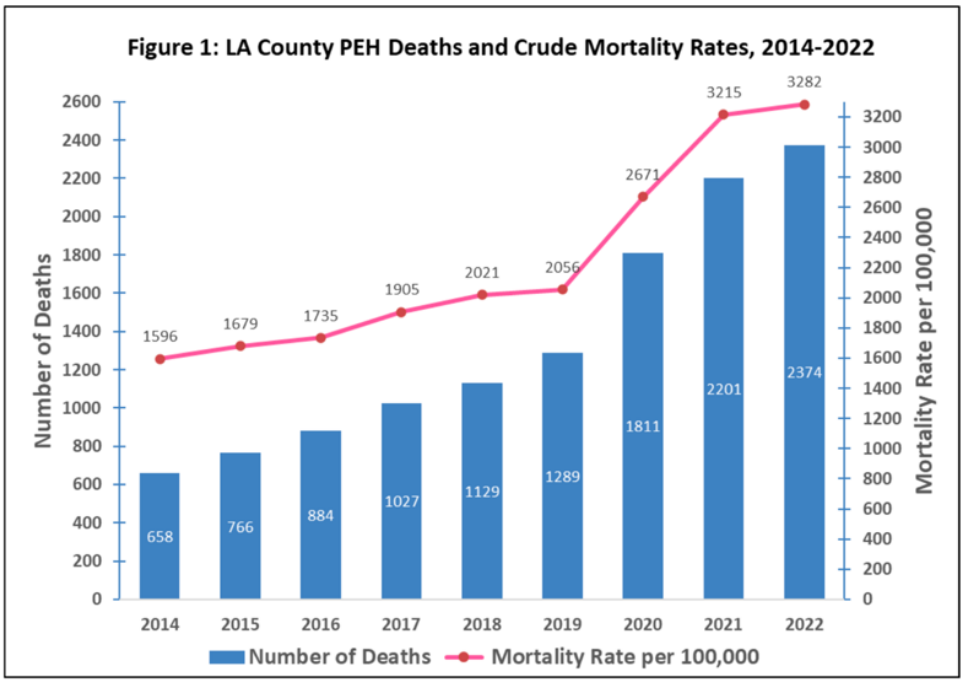
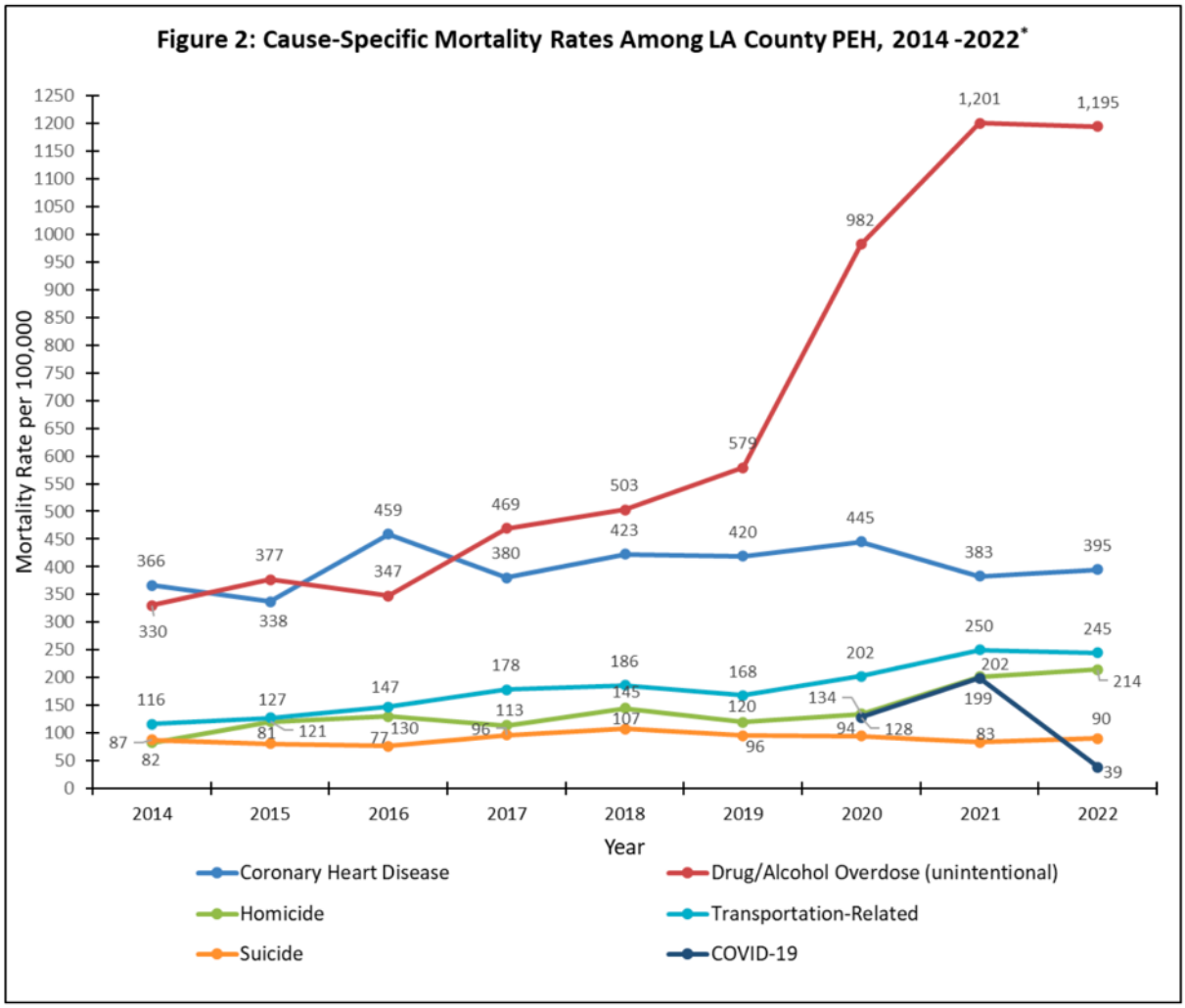


Table 2: Number and Characteristics of Los Angeles County PEH Deaths, One Year Before Pandemic vs. First Year of Pandemic

[28] Mortality Rates and Causes of Death Among People Experiencing Homelessness in Los Angeles County 2014 – 2011, County of Los Angeles Public Health, May 2024.

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%
	Gender			
Male	1037	1618	581	56%
Female	233	370	137	59%
	Age			
18-29	85	175	90	106%
30-49	373	633	260	70%
50-64	585	842	257	44%
65+	228	338	110	48%
	Race/Ethnicity			
Black/African American	325	515	190	58%
Asian	16	34	18	113%
Hispanic/Latinx	486	820	334	69%
White	426	592	166	39%
Other[1]	18	27	9	50%
	Cause of Death			
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%

[1] Includes American Indian/Alaska Native, Native Hawaiian/Pacific Islander, multiracial, and refused/unknown



* COVID-19 entered the top five causes in 2020 but by 2022 it had fallen out of the top ten. Since there was no homeless count in 2021 due to the COVID-19 pandemic, we used the average of the 2020 and 2022 counts to approximate the 2021 PEH population for all 2021 mortality rates.

The recent (2021 to 2022) plateau (see **Figure 1**) in the overall mortality rate can be attributed largely to a leveling off of the rate of drug overdose deaths, the leading cause of death among PEH for the past six years, and a sharp decline in Covid-19 mortality. From 2021 to 2022, the distribution of doses of naloxone, an opioid overdose reversal medication, saw a two-and-a-half-fold increase in communities most affected by fentanyl overdoses, and the number of reported naloxone-induced overdose reversals nearly doubled. These efforts likely contributed to the rapid leveling-off of the overdose mortality rate in 2022.[29]

In the first year of the pandemic, 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

[29] http://publichealth.lacounty.gov/phcommon/public/media/mediapubhpdetail.cfm?prid=4699

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%). 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%).

Deaths among young unhoused people ages 18 to 29 more than doubled in the first year of the pandemic. 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 in the first year of the pandemic 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.[5] 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 a 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, disproportionally 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.

For the combined years of 2021 and 2022, people experiencing homelessness were almost four times more likely to die than the LA County population as a whole. This mortality gap has increased since it was first analyzed for the combined years of 2017 to 2019, when people experiencing homelessness were slightly under three times more likely to die. The mortality gaps for specific causes of death have also increased. In 2021-22, unhoused individuals were 41 times

more likely to die from an overdose and about 18 times more likely to die of both homicide and traffic-related injuries compared to all LA County residents.[30]

The exact causes of mortality among the homeless population in Los Angeles County are diverse[31]:

- *Overdose*. Drug and alcohol overdose continues to be the leading cause of death among unhoused individuals in 2022, accounting for 37% of all deaths. Overdose was the leading cause of death among males and females, and among Whites, Latinx, and Blacks. Despite the recent leveling off of the overdose mortality rate among people experiencing homelessness, the percentage of overdose deaths involving fentanyl continued to rise through 2022 for all racial and ethnic groups and for both males and females, signifying. that the risk of fentanyl overdose is very high among unhoused people who use drugs.

- *Coronary Heart Disease*. The second leading cause of death continues to be coronary heart disease, accounting for 12% of deaths. Coronary heart disease was the leading cause of death among those 70 and older, the second leading cause of death among males, and the third leading cause among females. After a gradual upward trend in coronary heart disease mortality from 366 per 100,000 people in 2014 to 445 per 100,00 people in 2020, the coronary heart disease mortality rate decreased in 2021—during the height of the Covid-19 pandemic—and then increased slightly in 2022 to 395 per 100,000 people.

- *Transportation-related injuries*. In 2022 8% of deaths were from transportation-related injuries, which remained the third leading cause of death among unhoused individuals. The transportation-related injury mortality rate plateaued in 2022 after increasing steadily from 2014 to 2021. Assuming a relatively stable distribution of road traffic deaths among people experiencing homelessness over time, one of these deaths occurred approximately every other day over the course of 2021 and 2022. Ninety-five percent of those deaths were among pedestrians and cyclists and two-thirds occurred between 9 p.m. and 9 a.m.

- *Homicide*. Homicide was the fourth leading cause of death, with a rate of 214 per 100,000 people in 2022, the highest rate since these trends have been monitored. The proportion of homicide deaths was more than twice as high among males compared to females and was two to three times higher among Black and Latinx unhoused people compared to White unhoused individuals. In 2021 and 2022, two-thirds of homicide deaths involved firearms.

- *Suicide*. The overall suicide rate among people experiencing homelessness has remained relatively stable over time. However, from 2020 to 2022 the suicide rate almost doubled among unhoused people aged 18-29, and in 2022 this was the age group with the highest suicide rate. In 2021 and 2022, 5% of suicide deaths involved firearms.

- *Covid-19*. The Covid-19 mortality rate peaked in 2021 when it was the fifth leading cause of death among people experiencing homelessness. In 2022, the Covid-19 mortality decreased substantially such that it was no longer among the top 10 causes of death among unhoused people that year.

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30 http://publichealth.lacounty.gov/phcommon/public/media/mediapubhpdetail.cfm?prid=4699

31 Ibid.

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.[2] 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.[32]

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[2]

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.[33] 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.[34] Homeless individuals also commonly experience respiratory tract infections as well as oral and dental issues resulting from a lack of access to proper care.

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32 America's homeless population is getting older - Los Angeles Times (latimes.com) By Anita Snow Associated Press April 26, 2022

33 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/

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

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.[35] 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

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 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.[36]

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. Recently, there were 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.[37] *Bartonella quinate*, 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.[38]

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 climbed to more than 75,000 in 2023/2024. People continue to lose their jobs, and some of the Covid-19 government support was delayed, decreased, and/or failed to materialize. Between January 2020

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35 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)

36 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)

37 Los Angeles County Department of Public Health. November 15, 2022. LAC DPH Health Advisory: Increases of Flea-Borne Typhus. http://publichealth.lacounty.gov/eprp/lahan/alerts/LAHANtyphus111622.pdf

38 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)

and April 2023, there were 24,574 Covid cases among PEH, with 380 Covid-19 related deaths. 4,008 PEH sought care at a hospital and 3,832 were admitted.[39]

As the demand for shelter beds changes, the number of shelters (and other forms of more permanent housing) is increasing. The capacity of each shelter continues to be assessed to ensure that people can be safely housed.

Beginning April 2023, reduced household income due to pandemic-related job loss, illness or death were no longer grounds for deferring rent. Tenant advocates indicate that many renters are still grappling with the pandemic's aftermath as well as other economic factors. Without renter protections, they fear that L.A. County could see a further wave of evictions. [40] In addition, the recent Executive Order and other similar actions to remove homeless encampments may put additional pressure on the shelter system. While homelessness has recently plateaued the region continues to struggle to address the homelessness crisis because of the large number of people who need housing.

Substance Use and Mental Illness

Despite recent progress, substance use and mental illness remain two of the 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.[41] 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.[8] One study estimated one-third of homeless individuals in the United States name mental illness as the cause of homelessness.[42] 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.[43]

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39 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)

40 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

41 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].

42 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

43 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)

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 psychiatric hospitals with nowhere to go, therefore returning to the streets of Los Angeles.[44] 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.[45] 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.[46] 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.[47]

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.[48] Among homeless women with mental illness, the lifetime risk of violent victimization is 97%.[49]

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.[50,51] Further, a ten-year study in Boston found that homeless

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44 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)

45 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>

46 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-confes.pdf . 2014. Accessed September 2020

47 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].

48 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> [Accessed 16 September 2020].

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

50 "Premature Mortality," Nhchc.org, October 2011, |PAGE|, accessed September 16, 2020, http://www.nhchc.org/wp-content/uploads/2011/10/Premature-Mortality.pdf)

51 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> [Accessed 16 September 2020].

individuals sleeping unsheltered have a ten-fold increased mortality rate compared to the general Massachusetts population.[52]

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.[53,54, 55] 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.[56] 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, prohibition of tent or car habitation, and an absence of gender-mixed housing—allowing partners to stay together -- hinder individuals from using clinic services.

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52 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.

53 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].

54 2020. *Housing and The Role of Hospitals*. [ebook] American Hospital Association. Available at: www.hpoe.org/Reports-HPOE/2017/housing-role-of-hospitals.pdf [Accessed 16 September 2020].

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

56 Hunter, Sarah B., Melody Harvey, Brian Briscombe, 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

Several dedicated funding sources have been approved in the last few years 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.

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 PEH 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.[57] In FY 2021-2022, the rehousing system helped 15,733 people move into permanent housing.[35] 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.[35] To reduce the risk of Covid-19 spread, providers and the county reduced the total bed capacity of the "A Bridge Home" program.

A summary of total changes in shelter units and beds (including emergency shelters, transitional housing and safe haven) and permanent housing sites and beds (including PSH, other permanent housing and rapid re-housing) between 2019 and 2024 is shown in **Table 3** below.[58] Also shown

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[57] Los Angeles County Chief Executive Office, Homeless Initiative. September 2023. *Los Angeles County Homeless Initiative Impact Dashboard.* https://homeless.lacounty.gov/impact-dashboard/

[58] Los Angeles Homeless Services Authority, Housing Inventory Counts: https://www.lahsa.org/documents?q=Housing%20count&doctype=&scope=&progtype=&projtype=&sort=Trending

in **Table 3** is the annual point in time homeless count. Note that the annual homeless count includes people in shelters but people in PSH are not included in the count as they are permanently housed.

Table 3: 2019 - 2024 PEH Count and Housing Inventory Count, Los Angeles County Continuum of Care (C of C)

		2019	2020	2021	2022	2023	2024	2019 to 2024 Increase	
								No	%
Greater LA PEH[a]		58,936	66,436	67,790	69,144	75,518	75,312	16,376	27.7
LA C of C PEH		56,257	63,706	--	65,111	71,320	71,201	14,944	26.6
Shelters	Units	10,528	12,344	17,740	18,462	19,439	20,887	10,359	98.4
	Beds	15,617	19,159	24,516	25,263	24,898	26,642	11,025	70.6
PSH	Units	21,221	23,106	25,658	30,781	27,031	28,590	7,369	34.7
	Beds	28,887	30,806	33,592	35,537	34,214	36,744	7,857	27.2

[a] Greater Los Angeles PEH includes Pasadena, Glendale and Long Beach; housing inventory does not include these cities

Between 2019 and 2024 the total number of shelter units in the Los Angeles County Continuum of Care (which does not include Pasadena, Glendale and Long Beach) increased by 98.4% and the number of shelter beds by 70.6%. During the same time period the homeless population of Los Angeles County Continuum of Care increased 26.6%.

However, as can be seen from **Table 3**, even with the significant gains in shelter units/beds and permanent housing slots, the number of PEH in Los Angeles County continues to be substantially greater than the number of beds available.

People continue to fall into homelessness faster than the rehousing system can move them out. Data previously presented to the Executive Committee on Regional Homeless Alignment showed more than 60,000 people accessed homeless services for the first time in 2024. In addition, reductions to rental subsidies and other funding in the new fiscal year (2025-2026) threaten the rehousing system's ability to maintain its rate of permanent housing in the years to come.[59]

How Shelters and Permanent Housing Projects Address the Emergency

Given the severity of the homelessness emergency, 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.

[59] ttps://www.lahsa.org/news?article=1044-declining-homelessness-is-now-a-trend-in-los-angeles-county

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, continue to be urgently required. The County continues to pursue the construction of shelter facilities to provide service essential to public health, safety, and welfare to mitigate the emergency conditions outlined above.

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.

However, shelters are not a long-term solution for PEH.

Need for Permanent Housing

Los Angeles County's shortfall of affordable homes among renter households at or below 50 percent of area median income (AMI) declined from 581,823 in 2014 to 494,446 in 2022.[60] The unsurprising reality is that even these expanded resources are not yet sufficient to meet the growing need for affordable homes and related services. As discussed throughout this paper, homelessness continues to be an emergency in Los Angeles County. Severe housing cost burden—households paying more than 50 percent of household income on rent and utilities—continues to be the unfortunate norm among the county's lowest-income households -- 89 percent of deeply low-income (DLI) households, 69 percent of extremely low-income (ELI) households, and 44 percent of very low-income (VLI) households were severely cost burdened in 2022.[61] Since 2014, the rate of severe cost burden has declined for DLI, ELI, and Low-Income households and has increased for VLI, Moderate, and Above Moderate households. People of color are more likely to experience housing cost burdens than their white counterparts, with Black renter households experiencing the highest rate of cost burden at 60 percent.[62]

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60 California Housing Partnership, 2024 Los Angeles County Annual Affordable Housing Outcomes Report, June 28, 2024

61 DLI is 0-15% of AMI, ELI is 15-30% of AMI, and VLI is 30-50% of AMI.

62 Cost burden is paying more than 30 percent of households income on rent and utilities.

Permanent Supportive Housing (PSH) projects generally provide for PEH to move from the shelter system into a long-term solution that allows them to start to build or rebuild their lives. Permanent Affordable Housing can allow some people to avoid the shelter system entirely. Provision of affordable housing directly addresses the homelessness emergency by providing housing that can prevent people from falling into homelessness and lift others out of homelessness. Without permanent housing PEH remain in shelters for substantially longer periods of time and people newly falling into homelessness are not able to find shelter. Moving people from shelters to permanent housing allows the shelters to function properly as short-term solutions. Supportive and affordable housing is needed as urgently, if not more urgently, as shelters in order to allow people to regain and/or continue their lives and contribute to society.

Summary

In 2023 the County of Los Angeles had approximately 75,518 people experiencing homelessness countywide. In 2025 the number had decreased to 72,308 (a 4% decrease).

It was previously estimated that if the inflow into homelessness stops, our existing rehousing system if fully deployed, could end homelessness in Los Angeles County in three to four years.[63] During the crisis, Los Angeles County has been housing the homeless population at record numbers.[64] Nonetheless, the number of PEH continues to far exceed the resources available to house them temporarily let alone permanently. Each affordable housing project (as well as shelters and other forms of assistance such as permanent supportive housing) for the foreseeable future is urgently needed to address the homeless emergency in Los Angeles County. While each affordable housing project may not take people off the street (although in some cases it could), it is anticipated that permanent housing will either take people from the shelter system or provide for others who are in danger of falling into homelessness. The homeless population, especially those who are unsheltered, lives in precarious, extreme and dangerous conditions that expose them to the elements as well as other health and safety issues. Immediate action is needed to address this ongoing emergency condition that affects over 72,000 people in Los Angeles County.

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[63] 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

[64] 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)

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 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.