



**HOSPITAL
ASSOCIATION**
OF SOUTHERN CALIFORNIA®

January 27, 2016

Date: 1-27-16
Submitted in HSP Committee
Council File No: 15-1138-51
Item No.: 1
Deputy: PUBLIC

Councilmember Marqueece Harris-Dawson, Co-Chair
Councilmember Jose Huizar, Co-Chair
Councilmember Mike Bonin
Councilmember Gilbert Cedillo
Councilmember Curren Price Jr.

City Hall
200 North Spring Street
Los Angeles, CA 90012

Re: *Comprehensive Homeless Strategy*

Dear Members of the Homelessness and Poverty Committee,

The Hospital Association of Southern California (HASC) representing over 40 hospitals in the City of Los Angeles wishes to provide comment on the *Comprehensive Homeless Strategy*. We appreciate the Chief Administrative Officer and Chief Legislative Analyst report that provides a blueprint for addressing homelessness in the City of Los Angeles through system-wide change, as well as collaborative opportunities.

The magnitude and continued growth in homelessness requires both a coordinated and sustained long-term effort to address this complex social issue. HASC is pleased that this report recognizes the housing crisis and need to implement specific action steps. Insufficient community resources that provide immediate access to housing for homeless individuals is an enormous challenge for hospitals.

HASC appreciates the proposed short, medium and long-term strategies for sheltering the estimated 25,686 individuals the Los Angeles Homeless Services Authority (LAHSA) reported were homeless in 2015. The Coordinated Entry System (CES) can be instrumental in implementing a 'no wrong door' system that incorporates case management and linkage opportunities to programs that include housing, health, mental health and public assistance.

The recommended strategies in the report are all worthy of implementation given the magnitude of the problem. However, this comment letter is limited to the need to allocate various types of housing resources to the local CES's which in turn distributes them to individuals that meet eligibility requirements using a 'no wrong door' in-take process.

1. **Shelter System Personnel Need for Bridge Housing Conversion:** Strategy if adopted can assist individuals that lack immediate housing upon discharge from an institution (24/7); and individuals who are pending completion of the CES intake process that determines their acuity priority levels to match a homeless individual or family to the

right type of housing. Other individuals that can benefit from bridge-housing include those with pending application for public assistance, such as Social Security Income (SSI). Limited capacity and access within the current system restrict referrals.

2. **Expand Rapid Re-Housing:** Program can potentially benefit 50 percent the of non-chronically homeless families, individuals and youth to be quickly re-housed and stabilized in permanent housing through time-limited financial assistance, case management and targeted support services.
3. **Housing Choice Vouchers for Permanent Supportive Housing:** Strategy would direct the Housing Authority of the City of Los Angeles to incrementally dedicate Housing Choice Vouchers for permanent supportive housing for chronically homeless individuals.

Thank you for your time and the opportunity to provide comment. The Comprehensive Homeless Strategy report demonstrates a renewed effort to proactively address the contributing causes of homelessness, as well as solutions for those who call the street home. HASC looks forward to working with the City of Los Angeles to identify new and existing community resources that aid in effective placement opportunities to better serve our homeless individuals. Adequate capacity and access to the above housing programs is essential to our common goal of ending homelessness.

Sincerely,



JAIME GARCIA
Regional Vice President – Los Angeles Region

Accelerated Supportive Housing Production Plan

Goals:

- Increase the City's production of supportive housing by 700 units each year.
- Reduce predevelopment phase to 1 year from 2- 2 ½ years.

Key Assumptions:

- Target Population: 100% permanent supportive housing for individuals
- All units have rental subsidy (project-based vouchers/Flexible Housing Subsidy Pool)
- Average development size: 70 units
- Average total development cost/unit: \$320,000
- Construction financing from: 4% tax credit equity, bonds, deferred costs
- Permanent financing from: 4% tax credit equity, permanent loan, City of LA, other sources
- \$100 million new \$ from City of LA
- \$18.8 million other sources (ex. AHP, County of LA, State Cap and Trade or other funds)
- Public funding sources enter deal at permanent conversion
- Process in dedicated Housing & Community Investment Department expedited pipeline
- Expedited entitlement process/exemption

**1,000
units per
year**

**700
more**

**300
now**

Required Capital/70 Unit Development:

Acquisition/Predevelopment

Early loans from CDFIs: \$6M

Development Cost

Total development cost: \$22.4M

Construction Sources:

Construction Loans: \$19.6 M

4% Tax Credit Equity: \$1.6 M

Deferred expenses: \$1.2 M

Permanent Sources:

Permanent Loans: \$2.3 M

4% Tax Credit Equity: \$8.22 M

City of LA: \$10 M

Other: \$1.88 M

Operating Subsidies (Annual)

69 project based subsidies ≈ \$1,000,000

Services (Annual)

≈ \$370,000 (\$5,362 / per supportive housing tenant)

Required Capital/Year (700 units):

Acquisition/Predevelopment:

Early loans from CDFIs: \$60 M

Development Cost

Total development cost: \$224M

Construction Sources:

Construction Loans: \$196 M

4% Tax Credit Equity: \$16 M

Deferred expenses: \$12 M

Permanent Sources:

Permanent Loans: \$23.4 M

4% Tax Credit Equity: \$82.2 M

City of LA: \$100 M

Other: \$18.8 M

Operating Subsidies (Annual)

690 project based subsidies ≈ \$10,000,000

Services (Annual)

≈ \$3,700,000

Accelerated Development Timeline:

Now: 2-4 year period site control to construction start



Accelerated Production Plan: 1 year to construction start



Key Changes to Create 700 Additional Units per Year:

- Ability to close on land purchase quickly
- Expedited entitlement and exemption from entitlement process
- Utilize City's new expedited services including parallel plan check and over-the counter services, with guaranteed approval times
- Lift HCID's developer concentration cap

For more information:

Brigitt Jandreau, Chief Lending Officer

415-460-0899

brigitt.jandreau@csh.org

Mee Heh Risdon, Senior Loan Officer

213-623-4342 x 17

meeheh.risdon@csh.org

Accelerating Permanent Supportive Housing Program
Entitlements and Land Use Working Group Recommendations

High impact items

- Create an affordable housing unit within Planning Department immediately that is dedicated solely to processing entitlements and environmental for affordable housing projects. Make sure the unit has CEQA/environmental expertise. Projects with at least 50% homeless units would be moved automatically to the top of the workload.
- Use the tool of categorical exemptions for affordable housing projects.
- Create a “safe harbor” approval process setting forth criteria for locations of permanent supportive housing projects – proximity to transit, services, and zoning. City Council offices would be asked to certify that projects met safe harbor requirements.

Ordinance recommendations

- Create a state of emergency ordinance (similar to the downtown community plan) that would create a quick, clear path for affordable housing projects to get CEQA categorical exemptions approval without discretionary actions. Expand Downtown Housing Incentive Ordinance to other areas of the City (especially areas near transit and transit corridors).
- Create a motel conversion ordinance to allow rapid/by right reuse of underutilized or problematic hotel sites for affordable housing.
- Increase the 49-unit threshold that exempts projects in many instances from discretionary actions to 75 units.
- Amend the Density Bonus Ordinance to make on-menu incentives by right with no need for a discretionary approval unless planning approval is triggered by some other provision of the LAMC. This would make the on menu incentives similar to the increase in density and or parking reductions that can be obtained by simply going to LADBS to pull a building permit.
- Exempt PSH projects from any design review or other “legacy” requirements of CRA ordinances.

Procedural and other recommendations

- PSH developments should be assigned to a planner within three business days of application submission. LADBS/Planning/LADWP department shall assign project liaisons for affordable housing projects to make sure they move through the process.
- Establish time frames and staff levels to review CEQA documentation and issue determinations

- Incentivize market rate developers to include affordable housing in their projects or satisfy their requirements offsite but within the same council district.
- Allow more than 3 on-menu incentives to be taken by affordable housing projects without triggering discretionary actions. Restrict on-menu appeals, and appeal only to Planning Commission when triggered.
- Increase threshold number of peak traffic trips generated for affordable housing, or use CNT or CARB studies about VMT per very low income residents to determine peak trips for PSH projects, so as not to trigger as many traffic studies, which add significant time to processing.
- Direct and indirect TFAR payments to go to PSH projects.

From the Co-Chairs of Homelessness & Poverty Committee

Items for Immediate Implementation **Request for Funding in Current Fiscal Year**

Support for City Departments and the No Wrong Door Approach

- Provide training for LAPD [3A] and for other employees, such as RAP.
- Expand on the pilots at LAPD & LAFD that are ready to be scaled up, such as the Nurse Practitioner program [3C]
- Sanitation and LAHSA resources needed to properly implement the encampment clean up protocols, once the revised 56.11 is in place [3B]

Facility Improvements

- Provide for expanded storage, pending report requested from LAHSA [6A].
 - Improvements at the Bin, specifically bathroom access and staffing it with a CES intake worker.
- Co-location of facilities and service intake/navigation [6E].

Providing Shelter/Housing

- Bridge funding for the transitional beds being defunded by HUD, while they shift to funded models like RRH, without putting their clients back out onto the street. [7A]
- Participate in the Flexible Housing Subsidy Pool for areas of the City underserved by the County's current program. [10B]

Miscellaneous

- Continued improvements to CES personnel & outreach, integration with shelter system, and technology [4A & 7A]
- Start the Housing Linkage Fee nexus study [7F]

From the Co-Chairs of Homelessness & Poverty Committee

Items for Implementation in FY16-17 **Request for Funding in Mayor's Budget**

This list is in addition to the continuation or expansion of the Items for Immediate Implementation.

Support for City Departments and the No Wrong Door Approach

- Support LAFD & LAPD service and diversion programs [3C]
- Establish mental health clinician and diversion and discharge programs in City jails [3D]
- Case managers and training to help department interactions with homeless [4B].
- Departmental budget requests that are consistent with and necessary to implement the priorities in the Strategy, whether in their original or supplemental requests.

Facility Improvements

- Establish a Mobile Shower System [6C]
- Identify appropriate City properties [6D]

Providing Shelter/Housing

- Programs to encourage landlord acceptance of subsidized tenants [7H]
- Funding for housing gaps in specialty housing types, such as Recuperative Care beds, Stabilization beds, and Shared recovery housing [7A]
 - Provide for continued operation of DV sites [9K]
- Participate in a County matching program for Rapid Re-Housing [7B]
- Expedite Permanent Supportive Housing projects in the City's Managed Pipeline [10D]
 - Facilitate development of new projects through loan program [10C]
 - Identify appropriate City properties [7D]
- Establish an ongoing Safe Parking program, beyond El Nino Response [6B]

Miscellaneous

- Continued implementation & integration of CES [4A]
- Filled Homelessness Coordinator position, with hiring process beginning in FY15-16 [5A]



Los Angeles Countywide HOPWA Advisory Committee

Housing Opportunities for Persons With AIDS Program

1200 West Seventh Street, 9th Floor • Los Angeles, California 90017 • Tel: (213) 808-8805 • Fax: (213) 808-8965

January 27, 2016

Chair

Brigitte Tweddell
Project New Hope

Vice-Chair

Carlos Vega- Matos
Los Angeles County
Department of Public Health
Div. of HIV and STD Progs.

Committee Members

Christopher Callandrillo
Los Angeles Homeless Services
Authority

Maureen Fabricante
Housing Authority of the
County of Los Angeles

Terry Goddard II
Alliance for Housing & Healing

Theodore Liso
Member-at-Large

Danny Pepper
West Hollywood Community
Housing Corp.

Glenda Pinney
Los Angeles County
Department of Public Health

Ricky Rosales
City of Los Angeles AIDS
Coordinator's Office

Steve Wayland
Pets Are Wonderful Support /
Los Angeles

Los Angeles City Council Homelessness and Poverty Committee

Honorable Councilman Jose Huizar, Co-Chair

Honorable Councilman Marqueece Harris-Dawson, Co-Chair

Honorable Councilman Mike Bonin

Honorable Councilman Gilbert Cedillo

Honorable Councilman Curren D. Price, Jr.

City Hall

200 North Spring Street

Los Angeles, CA 90012

Attn: Eric Villanueva, Legislative Assistant, City Clerk, 3rd Floor

Dear Committee Members:

The Los Angeles County HOPWA Advisory Committee (LACHAC) appreciates the opportunity to submit comments on Los Angeles City's *Comprehensive Homeless Strategy*. We are concerned that the strategies do not prioritize people living with HIV/AIDS (PLWHA) into housing, which is an integral part of reducing the transmission of HIV in Los Angeles County and moving towards an AIDS-free generation. Below, we provide a summary of homelessness and HIV/AIDS in Los Angeles County, comments on the importance of prioritizing PLWHA into housing, and a recommendation for how to achieve this goal.

Demographics

As of 2014 there were an estimated 58,000 persons living with HIV/AIDS in Los Angeles County, representing 41% of all HIV/AIDS cases in California, and of those 58,000 people, 10,629 (18.1%) are undiagnosed. In addition, 75% of PLWHA live below 300% of the Federal Poverty Line (FPL), and homeless individuals account for 10.8% (4,960) of the diagnosed cases of HIV/AIDS in LA County.¹ These numbers are exacerbated by the structural challenges to accessing housing and supportive services and the high cost of living in LA County. *Please note that more than 65% of persons living with HIV/AIDS are in the City.*

Housing and the HIV Care Continuum

The United States Department of Housing and Urban Development (HUD) has documented the link between housing instability and both delayed HIV diagnosis and increased risk of acquiring and transmitting HIV infection. In addition, homelessness and unstable housing are strongly associated with inadequate access to healthcare and poor health outcomes. ***It is important to note that as an infectious disease without a cure, HIV/AIDS continues to be a critical public health issue, and there is a disproportionate risk of transmission and lack of healthcare among the homeless and unstably housed.***

¹ County of Los Angeles Division of HIV and STD Programs. Ryan White Part A Fiscal Year 2014 Application. Grant No. H89HA00016.

For PLWHA and those at a high-risk of contracting HIV, stable housing is the most effective health intervention, *over time having a bigger impact on preventing transmission and retaining PLWHA in medical care than demographics, health status, insurance coverage, mental illness and substance abuse, or other supportive services.*² Retention in and continuity of medical care leads to reduced viral load (the amount of virus in the blood), which means that PLWHA are less likely to transmit HIV, and the overall County expenditures on healthcare decrease. Stable housing is also linked to more frequent HIV testing and fewer transmissions, and this three-pronged benefit of housing PLWHA will help bring LA County one step closer to realizing an AIDS-free generation.


Recommendation

Based on this evidence, it is paramount that the City include in its recommendations a strategy to prioritize PLWHA into housing. Both the City and County of Los Angeles primarily prioritize homeless individuals into housing through the Vulnerability Index – Service Prioritization and Decision Assistance Tool (VI-SPDAT)³, which uses a scoring system to assess the “chronicity and medical vulnerability of homeless individuals”.⁴ To date, HIV/AIDS is weighted extremely low because the serious public health aspect of HIV/AIDS as a transmittable and incurable disease has not been factored into the scoring system. Thus, current methodology for prioritizing housing exacerbates the vulnerability of homeless and unstably housed individuals living with HIV/AIDS who do not qualify as “chronically” homeless. This, along with the U.S. Department of Housing and Urban Development’s new definition of chronic homelessness, will leave many homeless persons with HIV/AIDS on the street and unhoused.

However, there is a clear and simple opportunity for the City to prioritize PLWHA into housing while continuing to house the chronically homeless. LACHAC recommends that the City and County both include HIV/AIDS as an automatic high acuity designation for the Coordinated Entry System (CES) prioritization for housing and services. The reduction in transmissions of HIV and lower healthcare costs for both the City and County that would result are important benefits for the community.

LACHAC sincerely appreciates the opportunity to provide comments on Los Angeles City’s *Comprehensive Homeless Strategy*. If you have any questions, please do not hesitate to contact me at 213-250-9481 x11. Thank you.

Sincerely,



Brigitte Tweddell

Chair, Los Angeles Countywide HOPWA Advisory Committee
Executive Director, Project New Hope

² HUD Office of Community Planning and Development. *HIV Care Continuum: The Connection Between Housing And Improved Outcomes Along The HIV Care Continuum*. November 2014, <https://www.hudexchange.info/resources/documents/The-Connection-Between-Housing-and-Improved-Outcomes-Along-the-HIV-Care-Continuum.pdf>

³OrgCode Consulting, Inc. *About the VI-SPDAT*. January 2016. <http://www.orgcode.com/product/vi-spdat/>

⁴ Ibid



January 27, 2016

Homelessness & Poverty Committee
Councilmember Marqueece Harris- Dawson, Co-Chair
Councilmember Jose Huizar, Co-Chair
Councilmember Mike Bonin
Councilmember Gilbert Cedillo
Councilmember Current D. Price, Jr.
200 N. Spring Street, Room 340
Los Angeles, CA 90012

Re: Council File 15-1138-S1, Comprehensive Homeless Strategy

Dear Councilmembers,

Established in 1924, the Central City Association (CCA) is Los Angeles's premier business advocacy organization, with 450 members employing over 350,000 people in the Los Angeles region. CCA represents a broad swath of the businesses that drive the Los Angeles economy and knows its continued success is dependent upon the ability to tackle complex issues such as homelessness. CCA commends the City for the Comprehensive Homeless Strategy and believes it is an excellent report with strong recommendations.

CCA is focused on short-term and long-term solutions addressing homelessness and we are encouraged by the City and County's partnership. These recommendations are offered as short-term solutions to address the serious homeless crisis facing the City.

Short-term recommendations

- **Fund Additional Outreach Workers-** The City needs additional outreach workers who are connecting homeless individuals to appropriate services and housing.
- **Keep the Winter Shelters Open Year-Round & 24 Hours a Day-** The City has 861 existing winter shelter beds and an additional 440 winter shelter surge beds available for inclement weather. These existing resources should be fully maximized. CCA believes they should be open all day and year-round and they should offer supportive services. This would make it easier to locate individuals and help them secure housing. These facilities should also be considered as possible storage locations for homeless individual's personal property.
- **Fund Urgent Care Beds to Treat Mentally Ill Homeless-** The LAPD estimates 30-40% of arrestees have a mental illness. Many of these individuals are taken to jail or the emergency room and not connected with appropriate services. There are currently five urgent care centers in the County of Los Angeles and LAPD has begun to utilize them as an alternative to jail or ER but people can only stay for 23 hours. There needs to be more specialized bridge housing options

for people with mental illness. It takes an average of 90 days to move homeless individuals from a shelter to permanent housing. Due to a decision from HUD, LAHSA will stop funding 2,000 transitional housing beds in 2016. The City should utilize this existing resource and allocate funds accordingly.

- **Utilize City Owned Property to Open New Storage Facilities**-The City should leverage this existing resource to provide citywide storage for homeless individuals' personal property.
- **Adopt the Draft Ordinance Amending Section 56.11 of Los Angeles Municipal Code**- CCA supports the draft ordinance as amended by the Public Works and Gang Reduction Committee on January 25, 2016 and believes it strikes a balance between balancing the rights of all community members including homeless individuals.
- **Fund Additional Environmental Compliance Officers (ECO)** - Currently there are 16 ECO's and an additional four being trained. This represents 20 ECO's citywide. CCA is concerned this is not sufficient numbers of persons to maintain sidewalks and other public areas in a safe and clean condition.

We hope you will prioritize these items as you deliberate the Comprehensive Homeless Strategy. CCA is committed to partnering with the City and County to support solutions to address homelessness.

Sincerely,



Carol E. Schatz
President & CEO



Eric (Roderico) Villanueva <eric.villanueva@lacity.org>

CF: 15-1138-S1C

1 message

Alisa Orduna <alisa.orduna@lacity.org>

Wed, Jan 27, 2016 at 5:46 PM

To: "Eric (Roderico) Villanueva" <eric.villanueva@lacity.org>

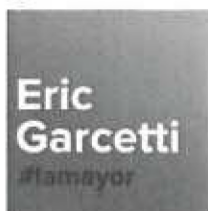
Cc: Greg Spiegel <greg.spiegel@lacity.org>

Dear Eric,

Please find attached constituent feedback on the Comprehensive Homelessness Strategy Report to be added under public comment for CF: 15-1138-S1C

Thank you,

Alisa



Alisa Orduna

Homelessness Policy Analyst
Office of LA Mayor Eric Garcetti
200 N. Spring Street, Room 1305
Los Angeles, CA 90012

Office: 213.978.0779
Cell: 213. 713.3147



Homelessness Feedback.xlsx

25K

first_name	last_name	email	primary_state	primary_city	primary_zip	primary_address1	Feedback
Linda	Lucks	lindalucks@gmail.com	CA	Marina Del Rey	90292	13100 Maxella Ave	Declare an emergency NOW and open more shelters near where homeless people live and more pick Up locations. Distribute tarps and palettes.
Susan	Polifronio	susancpt@earthlink.net	CA	Los Angeles	90028		Why can't we divide unused public buildings with shower facilities, in appropriate locations, into dorm-room style accommodations. That way there is privacy and collectivity for outreach in one place. The Homeless sleeping on the sidewalks during the day for safety reasons is a real embarrassment in a Country as wealthy as the USA. Also, connect with the Universities for credits given to students in Public Health, Social Work, Psychology, Medicine for joining a program that the City of LA sets up for Outreach intervention. Pair them as Interns with trained personnel and they will get credit the same as an academic class. This way you increase the number of outreach workers at the same time saving on salaries. There are the expenses of training and insurance/liability but I think the City of LA can figure that out working with the County Supervisors.
David	Barron	barron4citycouncil@yahoo.com	CA	Los Angeles	91042		My honest feed back; A Homeless Report that delivers a 10 year plan??? No! Mr Mayor. How about three years? You referred to Ms Greuel as a Homeless expert. She said, she has a life-long dedication with the homeless and has been a key advisor setting policy all the way back 25, 30 years ago, starting with Mayor Bradley, and with President Clinton working with HUD. But, during all these years of advocacy, homelessness has escalated to a present crises! Well, this will keep her from running for mayor. As a former construction inspector for the State Architect; I would use common sense and utilize empty city, state and federal government buildings. The West LA municipal building I work out of, has been 65% empty for years. Refurbish abandoned homes. Much cheaper than building new projects. I disagree initially, asking struggling LA residents and businesses to contribute to this issue. We've already paid plenty in Federal tax dollars for our wars and services for our returning veterans. We shouldn't have to be asked to pay twice. We're struggling as it is, with DWP skyrocketing utilities. If I was on city council, I would call a press conference to demand Governor Brown put a bullet through this bullet train, so our legislators could concentrate on this homeless crises. By the way, partly created by bad government legislation. I would get after congressmen, Tony Cardenas, Brad Sherman and others and even ask help from President Obama, to release Federal dollars we've already paid, to build the 2500 beds at the Westwood VA campus and Sepulveda VA campus. I would call out the county supervisors to roll out the red carpet and prioritize funding to provide drug treatment and mental services for the most homeless needy. Governor Brown should agree with this with his Prop 47 bill. Another suggestion; eliminate developers having a monopoly on building these housing projects at five times the going rate to build these residential multi-units. Eliminate secrecy and provide transparency by putting the projects out to public bid, so we can build these projects at the normal going rate. This would leave us with extra dollars to build additional units, so we wouldn't have to leave as many homeless out in the cold. Transparency and integrity, would eliminate the FBI having to get involved investigating why a project ran out of money, as the building is boarded up and falls into disrepair, causing blight for the neighborhood.. As often happen in the past. Here is the 'Grand' suggestion that former deputy mayor Rick Cole agreed with me. And, that was, we should repeal the City's business tax which is driving employers out of town, which is contributing to unemployment and sending many folks to live on the streets. And, thank you, you did announce this suggestion right after you got elected, at a town hall meeting at Shepherd of the Hills Church. in Chatsworth. But, darn it, soon after, you changed your mind and said you reconsider it down the road. So, we end up with a good numbers man leaving the City. Rick Cole stated when he resigned, "LA is not designed to work."
Aris	Anagnos	anagred@mindspring.com	CA	Los Angeles		1741 Correa Way	Use a mothballed air force base in San Bernardino to house tens of thousands of homeless from L.A. and neighboring counties. Can be made available quickly, ask the President directly, don't go through the Dept of Defense bureaucracy.
katherine	watkins	tularosadr@gmail.com	CA	Los Angeles	90026	951 Tularosa Dr	NO INCREASED TAXES!!!! History has shown over & over again that money will go to a new Bureaucracy...just like 90% of the other failed government programs. The private sector should be encouraged to attack this problem...Ron Burkle, David Geffin, even the Clinton Foundation!!!! Cut your salaries & benefits! The American citizens have paid more than their share to all the Government's big dreams.

Ilene	Leiter-King	mazel4854@aol.com	CA	Los Angeles	90035		I have been involved in the homeless community for over 40 years government thinks it is better to house people that are homeless in apartments etc. but they go in there isolation-depression and use drugs/alcohol. my thought is a community where they work they give up their SSI money or GR money to house them selves with an overseer-houses rather than apts. Their own community with their own stores, without drugs or sales of alcohol. Should be a school for them to get GED Etc-trade. where they produce something with the agricultural or something so that they can earn money while he have SSI or Gr they need to be responsible and use their money for housing like it was intended not to put in their properwithout drugs are sales of alcohol or there be a school for them to get GED or higher education where they produce something with the agricultural or something so that they can earn money while he have SSI or Gr they need to be responsible and use their money for housing like it was intended not to put in their pocket or use on drugs or alcohol.
Zella	Knight	zk8ed@yahoo.com	CA				Housing First is not a new concept. It was the brain child of Tanya Tull in the 1980's and implemented with Beyond Shelter. Implementation must include the following principles Principles of Housing First are: 1) Move people into housing directly from streets and shelters without preconditions of treatment acceptance or compliance; 2) The provider is obligated to bring robust support services to the housing. These services are predicated on assertive engagement, not coercion; 3) Continued tenancy is not dependent on participation in services; 4) Units targeted to most disabled and vulnerable homeless members of the community; 5) Embraces harm-reduction approach to addictions rather than mandating abstinence. At the same time, the provider must be prepared to support resident commitment to recovery; 6) Residents must have leases and tenant protections under the law; 7) Can be implemented as either a project-based or scattered site model.
Robert	McLean	rmclean@socal.rr.com	CA	Los Angeles	91344	13063 Meadowlark Ave	Basically the report does not factor in the actions and policies of the city government in making sure that good jobs have left the city, that people can no longer afford to find housing and that while you are pushing for the Olympics and Syrian refugees, US Veterans (women and men) are living on the streets. You have no idea how to help them get off and stay off the streets. You have no idea what the proposal that you are making will cost, sheltering them does not solve the problem, it just makes you feel good.
Tim	Lee	tim.x.lee@gmail.com	CA	Los Angeles	90012		The piles of belongings and trash that are scattered throughout downtown LA are a horrible security threat. It is a matter of time before someone hides a bomb in there. We just had an attack in San Bernadino. Please make your citizens safety the priority. DO SOMETHING!
Priscilla	Reed	dr.priscillareed@gmail.com	CA	Los Angeles	90047	2025 W 65th St	I am pleading with all section 8 tenants, advocates, activists, empowerment congress, neighborhood counsels, homeowners, renters especially if you are renting a single family home to please get involved now read and write your opinions, make sure your experience is remedied and included as a policy change in the movement today!
Laurence	Hotchkiss	andrekenya@gmail.com	CA	Riverside	92505		The most desperate form of being homeless are those with mental or physical deficiencies. They are the most desperate group in the face of climatic change, cold and rain. They need more help than simply a dry place to sleep.
Ellen	Gedert	ellenmartha@gmail.com	CA	Los Angeles	90045		Homelessness is an enormous problem in Los Angeles. I would approve a tax hike to solve this problem if a: I knew the money would go specifically toward this problem and b: we were not importing poor, illegals by the thousands. The poverty rate is the same as it was 50 years ago. I wonder why?
Nancy	Shannon	lannymc18@hotmail.com	CA	Sunland	91040	10424 Floralita Ave	You will not combat homelessness until you have a comprehensive mental health plan in place. In addition, the LAPD need to be more proactive (like Burbank, Glendale, and L.A. County) in citing transients for quality of life issues (drinking in public, smoking at parks, trespassing, etc). Until these things are done, there will be no end to our troubles.
dianna	davidson	dld829@gmail.com	CA	Los Angeles	91401		If L.A. gets the Olympics, it is rumored that housing will be built for the 10,000 athletes. And L.A. will provide that housing. And if there is NO Olympics here, why can't we still provide that needed housing for our Homeless.?? ? ? ? ?

Sharon	Washington	howard_sharon@earthlink.net	CA		91342		My son lived at Fairview Developmental Center for a year. I have discovered that: The developmentally disabled population is being phased out of the large institutional settings i.e. DCs known as Developmental Centers. It is possible where upon transitioning the DD population out, the homeless can be transitioned in, and simply carry over the cost from the DD population to the homeless. This would get them off the streets and into housing with no new costs or construction of facilities. These facilities include full services like a fully operational hospital that could provide service for the mentally ill, there are work training workshops, varied types of housing depending on the individuals needs, their own policing station with vehicles, recreation...These large DC estates have most of what the surrounding community has, but in a smaller area creating a supportive community for those housed there. Turning over DC operations from developmental service to homeless services would solve a world of problems, as well as creating many new jobs just like the surrounding community would. These DCs are just that – communities on a smaller scale. Fairview Developmental Center is 114 acres and is self contained. Here is a workable solution and someone needs to step up and spearhead this option to the homeless problem.
Davilee	Henderson		CA	Los Angeles	90037	122 W 53rd St	As a housing Specialist working for a non-profit in Los Angeles, I personally housed over 100 homeless families. The solution to ending homelessness is more street outreach teams who are assigned to getting individuals directly off the street. Unfortunately, some people walk into organizations claiming homelessness to receive housing assistance. If we outreach, we will be assisting the most vulnerable individuals. Then create a special zoning for that particular area.
Ben	Cowitt	benlcowitt@gmail.com	CA	Studio City	91604	12841 Bloomfield St	Instead of spending money on a soccer stadium in the city of Los Angeles, have those prospective investors put the money into housing for the homeless.
Patricia	Hunter	patty_hunter@yahoo.com	CA	Simi Valley	93065		my city has 2 empty schools and multiple office complex/campuses that contain kitchen facilities and bathrooms. I propose each location could be leased back; assigned to either Men; Women with children or family units. Each facility must be cleaned and maintained by people living in those units, to qualify to stay further. These people staying must contribute to the running and maintain the facility they occupy. Welfare does not work and should not be the case for a solution to homelessness. The various levels or reasons for the homelessness need to be addressed with a transition back to being a contributing member of society.
Reba	Lee	pullfocus2012-outgoing@yahoo.com	CA	Los Angeles	90048		How about getting rid of weekly street cleaning. I don't think it does much of a difference. Spend the money to solve homelessness. These people need a safe place to clean themselves up and get food. I think the money would be better spent taking care of people than just sweeping up debris from streets.
Toni	Reinis	treinis@yahoo.com	CA	Marina del Rey	90292		I have been working in the area of homelessness for 30 years and we are currently ill equipped to deal with the thousands of homeless people on the streets today. With the tunnel vision of "housing first" you have forgotten the emergency needs of people on the street and also those living on the edge. We are doing nothing to stop the flow of individuals and families and we will never be able to address the numbers without demanding that each system that is creating homelessness(military, prisons, jails, child welfare, hospitals, mental health centers, women and seniors) is fixed. The second issue is that the Westside cities refuse to shelter homeless people and as a result there is only one pick up site in Venice and one shelter while thousands remain on the streets of Culver City, Santa Monica, Beverly Hills, Westchester, Marina area, West Hollywood, Malibu, etc. This has been going on for at least 6 years and it needs political intervention in order to save lives. Homeless people do not care about jurisdictions, they just want help. The third issue is the article in today's paper about Ms. Brown dying from hypothermia. Why didn't they use a 72 hour hold? She was clearly in danger to herself. The police need to do a better job of interpretation of that law. I am sure Ms Brown was not the first to die this winter because of hypothermia and she will not be the last. I was at the only pick up site for the entire westside last night giving out sandwiches and everyone was wet and cold while waiting for the bus. There is no cover and they must stand there in the rain. We treat animals with greater care. Happy to be of help. Toni Reinis

Andrew	Bare	acbare@gmail.com	CA	Los Angeles	90020	Based on the expert opinions that I have read, the new homeless budget will not be enough to eliminate homelessness or even reduce it to a noticeable extent. Therefore, my opinion is that more money should be allocated into proven solutions, such as the Housing First model which provides apartments, a social worker, and money to homeless people so that they have the basic safety, food, and clothing requirements to help them put their life together. Interestingly, Utah has successfully implemented this strategy and it reduced their homeless population AND was cheaper than leaving the homeless on the street.
Donyale	Allen	cheetahvanityposhhh@gmail.com	MG	Itabira	35900-047	Well I am homeless myself and a strategy NY uses is like apartment buildings called projects that individual families move into to help lift burdens. I don't know if they are curfew based. But I feel it will be helpful because it helps the burden meanwhile I can prepare myself for job interviews. It should be easy to access to the public.
Toni	Gabriel	tgabriel123@gmail.com				perhaps since the homeless are living beneath the freeways anyway, individual pods combining the Japanese idea of airport housing, and our storage facilities could be built. They could be locked, and afford privacy.
Hayley	Marcus	heyhayley@icloud.com	CA	Pasadena	91107	Help for mental illness comes first.
Lucia	Ludovico	lutoyou@gmail.com	CA		90272	My primary concern is Crime and Safety. The Palisades Bluffs is a disaster. The campers, homeless or not, are threatening this community, starting fires, violating posted law of criminal trespass and camping. Please separate the Fire/Crime/Safety from the issue of Homelessness. Homelessness is a severe complex problem that can only begin to be tackled by identifying socio-demographic groups (Families out of work, substance abusers, mentally ill, veterans etc.) and administering the appropriate help. Not one solution for all. You can't just throw money at one problem. It reflects many diverse malfunctions of the System and individual despair.
Philip	Breuer	philip.breuer@gmail.com	CA	Los Angeles	91406	I see homelessness as a big current challenge facing Los Angeles that will only grow over time. I am glad to see a plan. Our actions to address this challenge in a humane way could end up attracting even more homeless, exceeding our resources. So it is important to ensure the holistic system works to address the issues in concert with national efforts – both in terms of movement and funding. This is a national issue that should be funded nationally. Part of the system that must work well, as part of the on-going beautification and livability of our community, is protection of parks. We simply cannot tolerate homeless camps in our city and country parks. This is a very serious issue that endangers not only the parks but also the nearby neighborhoods. The persistent homeless camps along the Orange Line, bike path, and throughout Lake Balboa Park are continuous risks to public safety and causes of petty theft and litter while causing serious damage to the environment and the public resources.
Beth	Strom	stirnaman.photo@gmail.com	CA	Los Angeles	90066	I am thrilled to see more funds being devoted to help individuals affected by homelessness, but we need so much more. I am currently ashamed to be an Angelino with how little we are doing for those who have the most need. I hope that the city, county and state can work together to bring more permanent supportive housing resources to LA. I am excited to hear about the state's plan to invest 2 billion and I hope that LA partners with them to make this happen. I know that NIMBYism has stopped many other projects here, but we have so many successes to show people now that services in a neighborhood benefit the whole community. I urge the city to invest more funds into permanent solutions that will save us all more money in the long run and save many lives. Thank you.

Shann	Dornhecker	shnnd@ucla.edu	CA	Los Angeles	90024	<p>Eliminate non-profits from the equation and utilize funds from grants to create a unified system taking the best practices without the negatives that non-profit orbs often inflict on homeless people because they are to worried about meeting an grant audit and not actually listening to the needs of the homeless individual. This leads to homeless recidivism and a distrust of services. With \$100M on the table too many opportunities for non-profits to line their own pockets. As well. If the board of supervisors created an ordinance barring landlords from income discrimination (demanding income 3-4x the rent and equal savings) more people on fixed or limited income would be able to afford rents in areas they work and reduce the likelihood of job loss, a path towards homelessness due to economic factors. Work with HUD to create buddy housing sharing vouchers where landlords with multi-family units would be able to accept housing vouchers for roommate situations for those that come out of the same housing programs. Quit allowing rent control apartments from being torn down and set a maximum cap on rent for single and bachelor apartments. It is ridiculous a bachelor apartment that 2-3 years ago went for 700-900 is now \$1200-1700. Or a studio is \$2000. Utilize incentives for voucher landlords to facilitate paths to better employment by partnering with industries that pay well such as technology. Leverage local business tax credits and lobby state and federal fund to incentivize employers to bring coding, tech support, phone service jobs back to impoverished areas. Better employment means a move off subsidized housing and into market rent creating churn in the subsidized housing units. Revitalize South Central LA as a new tech hub by partnering with programs like Project Fatherhood and Homeboy to build a working class of tech workers replacing the auto industry and other heavy manufacturing jobs lost due to economic shifts in the global market. Respectfully submitted.</p>
Anthony	Soto	mrpopularbaby@gmail.com	CA	Los Angeles	90033	<p>Good afternoon my name is Anthony Soto I'm homeless. I'm 28 and live on the side of the 5 freeway... Life isn't easy out here. You have no idea. There is so much talk to help the homeless but no action... I live on the side of the freeway because when I try to go to a shelter for a shower or somewhere warm to sleep, I am discouraged do to the fact I am treated like I'm some diseased rat. Taking a shower always requires some kind of religious course or if not some drug classes. In which for me is unfair because I am NOT religious nor am I a drug addict. I really hope this does get to Mayor Eric Garcetti... If he only knew; if they had Resources where you were able to go to a shelter to sleep somewhere warm and take a shower without having some kind of religious denomination or drug addiction background to qualify for. It would be monumental for the homeless population. At least for myself. I know that if given the chance to take a shower & have somewhere warm to sleep would help me go through my day and give me the confidence to go look for a job that would take me off of government assistance program. It would give me my life back... So please don't let my words be a waist of time... PLEASE AT LEAST HELP THE ONE'S WHO ARE LOOKING TO GET THEIR LIFE BACK... You really don't know how hard it is out here.</p>
Dee	Pack	dee.w.pack@gmail.com				The link to the report on your website doesn't work

Nancy	C	nancngeo@pacbell.net	CA	Los Angeles	91605	<p>Back in 2011, I watched a program on TV, where they did a story of Santa Barbara's SAFE PARKING PROGRAM....for homeless people...in vans or campers, etc. This program, I believe, is COUNTY sponsored and run by New Beginnings. There are rules and regulations. I forwarded the information to Council District 2 for their consideration back in 2011, but never heard anything back, except they would look into it.... as it was a problem back then as well. This story was about a bus driver..who makes \$18/hr in Santa Barbara, has a ton of debt..and cannot afford to house himself there ..while he works. This could work for L.A.County as well, and provides a safe shelter, with bathrooms and access to services. I don't know if they (homeless) pay anything for the spot to park or not...but did hear there is a long waiting list for that particular spot (In Santa Barbara). The point is.. the idea is workable... if we have empty properties..and we all know we have empty properties. If the City keeps allowing the homeless to live on our residential streets... why can't the City open one of THEIR lots and have them go there...where it is safe.... and there are bathrooms..services, etc. The old Montgomery Wards on Roscoe in Van Nuys, for example. Heck they were squatting there for awhile anyway. There are LOTS of empty properties around who could take campers in and not have them on our residential streets and provide safe haven for them. Is there anything like this around here? Does anyone know? I can't be the first one to bring this up....and wonder if there is such a program in LA...or has there ever been.... and is there a chance of getting one?? I know property liability is a huge concern for the property owners as well, and there are lots of opportunists out there to take advantage of a premises claim or lawsuit.. It could be a start..... Getting individual homeless off the streets is another story. We have mental health issues, drug addicts and people that just do not want to live by any rules. Not sure if there even IS help for them. Look at the poor woman who died from the elements this last week...but she was offered over and over help, shelter, and tents and coverings...all which she refused. Nobody wants their community overrun by homeless and blight. I personally feel that the east end of the valley is saturated with it. While there are compassionate people who would like to help, it seems that nobody wants it in "their backyard". It's been that way forever. Again.....this show was back in 2011. I'm not even sure New Beginnings still does this and if the contact information is good any longer.. This is their website post which describes what they were doing there in Santa Barbara: New Beginnings' Safe Parking Program provides case management and outreach to the homeless and safe overnight parking to individuals and families living in their vehicles. New Beginnings has operated the Safe Parking Program since 2004 in cooperation with numerous local churches, governmental and non-profit agencies and businesses. We provide confidential, daily-monitored parking places for those who are living in their vehicles because they do not have sufficient income to provide for their basic need of affordable housing. In addition to operating 115 safe overnight parking spaces, the Safe Parking program connects the chronically homeless to shelters and services that will get them off the streets.</p>
Epheriam	Williams	nehemiahazbuk@gmail.com	MN	Saint Paul	55109	<p>It's a great concept and a great place to start also a great standard to set for the entire nation. It's time we focus on our own home front and back away from others. This is true home land security.</p>
Pattee	Colvin	patteecolvin@yahoo.com	CA		91040	<p>we need to buy property or use vacant property to put little tiny houses on. also lots of vacant building in Los Angeles area we could turn in to shelters or permanent housing.</p>
Timothy	McDaniel	tim@lemarkrealty.com	CA	Los Angeles	90002	<p>Tax Subsidies for Landlords that rent cannot afford to rent at Housing Authorities level of rental assistance for Section 8 applicants.</p>
Rhonda	Huerta	zonerkwo@yahoo.com	CA		91342	<p>Please address how areas with alcoholic beverage outlet overconcentration and poorly monitored recycling centers TRAP many homeless in their alcoholism adn addiction. We need rehabs and mental hospitals for these people. Many homeless people need addiction rehab services and some need to be in mental hospitals. Housing First must be followed up with comprehensive, wrap around supportive services.</p>
Janet	Jacobson	insert.here@gmail.com	CA	Los Angeles	90013	<p>Poverty is the main catalyst for crime. LAPD get 1 billion annually and still can't prevent crime. Take LAPD's over fat budget and create community centers in every neighborhood with homeless issues. Take LAPD's billion annual dollars and use it for whatever you people claim the fake inflated property market brings the city. When you reduce poverty, reduce a lack of housing, and reduce a lack of access to mental health you reduce crime and homelessness. Money better spent than throwing it away on a useless police force.</p>

Rachel Brashier
Policy Director
Office of Council Member Marqueece Harris-Dawson
Council District 8 of the City of Los Angeles



Re: Comments on the Comprehensive Homelessness Strategy for the City of Los Angeles

Dear Rachel Brashier,

Thank you for the opportunity to contribute to the City's process in developing a Comprehensive Homelessness Strategy. We want to thank Council Member Harris-Dawson for his continued efforts to confront our long-standing crisis of homelessness in Los Angeles. And he is to be commended for leading the City's homelessness strategy as the Co-Chair of the Homelessness and Poverty Committee of the City Council. There is significant momentum within the City and County to pass and implement solutions that address both the immediate life-threatening conditions so many endure on a daily basis and the root causes that have led to record numbers of Angelenos living on the streets. So it is with great respect for your work and humility we provide our comments here.

First, we echo many of the comments shared at the Homelessness and Poverty hearing on January 13, 2016 that highlighted the need for greater breadth in the plan. To be a truly comprehensive strategy, the issue of domestic violence (DV) as a driver for homelessness must be fully addressed with appropriate policies to advance safe and affordable housing options for victims of DV and in coordination with programs to end violence at home. Likewise, violence and harassment by police and security forces directed towards the homeless serve to worsen the homelessness crisis. Serious attention and resources must be devoted to a shift in culture and in budget towards the decriminalization and humanization of the homeless. And, lastly, we reiterate the calls for a comprehensive strategy that acknowledges that the solution to the crisis of homelessness comes down to (a) stable homes and communities that are protected from the dismantling pressures of displacement; and (b) an ample supply of housing affordable to and supportive of low-income and no-income families. This brings us to our first recommendation.

Recommendation #1: Add a chapter on "Homelessness Prevention and Anti-Displacement Strategies," complete with a suite of policies and financial mechanisms addressing the diverse forms of displacement that are powerful drivers of homelessness.

The Economic Roundtable reported last year that each month, over 13,000 people enter homelessness in the County of Los Angeles. As you know, many of these people live in the City of Los Angeles, are not chronically homeless and are living on the streets because they have been forced from their home (often illegally), can no longer afford rent, have lost a job and/or have incurred major expenses from medical care. Many are families who have faced the challenges of overcrowded housing, slum housing, long-term unemployment and skyrocketing rents. The destabilization of their housing severs their connection to their community and schools, and places enormous health costs on family members who lose the physical and mental health-promoting benefits of a stable home.

For these reasons, we recommend the chapter on Homelessness Prevention and Anti-Displacement Strategies include solutions that fall under the following categories:

- **Protection and strengthening of rights for all tenants** of housing covered or not covered by the Rent Stabilization Ordinance (RSO). The RSO's tenant protections must be proactively monitored and fully enforced as a first line of defense against homelessness. Today, many RSO violations go unnoticed or unchallenged. For tenants living in housing not covered by the RSO, even fewer protections exist. And this must be changed through the adoption of citywide "just cause eviction" law and associated tenant rights applied to all rental housing in the City of Los Angeles.
- **Minimize the harmful effects of the Ellis Act on tenants in Los Angeles.** The Ellis Act allows property owners to evict tenants by replacing rental units with for-sale housing (e.g., condos) or commercial uses. Local implementation of the law has provided substantial loopholes that are devastating to tenants. Since 2013 alone, the use – and abuse – of the Ellis Act has led to thousands of tenants being evicted in Los Angeles as units are converted to condominiums or demolished. These loopholes must be closed at the local level so that landlords cannot illegally abuse the Ellis Act and harm families. The City must also support reform in the State legislature of the Ellis Act.
- **End the loss of public housing.** Public housing remains one of the most critical forms of affordable housing, reaching families at the lowest ends of the income spectrum. Public housing continues to be threatened by redevelopment plans that risk displacing tenants while losing the public housing to privatization.
- **Land use protections for RSO housing.** Preserve housing affordable to low-income families through the application of land use and zoning policies that protect RSO units and other units affordable to low-income residents. (See further details in Recommendation #2, below)

Recommendation #2: Direct the City to use its land use and zoning powers to protect the homeless, increase our stock of affordable housing and prevent displacement of tenants living on the verge of homelessness. Integrate strategies under Strategies 8A and 8B of the Comprehensive Homelessness Strategy.

A land use approach can be designed to support equitable development and achieve a net gain of affordable housing by integrating policies that:

- **Apply value capture** to achieve appropriate public benefits (including the creation of new affordable housing, at deep levels of affordability) from new development projects;
- **Strengthen affordable housing incentive programs** to achieve greater and deeper affordability along with replacement requirements;
- **Set an annual allowance on demolitions and condo conversions**, which are key drivers of the displacement of tenants and the loss of RSO housing;
- **Monitor the stock** of housing affordable to low-income residents, and implement additional protections when a net loss of affordable units is observed.

Particularly where there are major public investments – such as along our growing transit network – land use policies afford a tremendous opportunity to advance the City's goals for ending homelessness. Public transit investment can amplify gentrification and worsen homelessness. However, if we design equitable policies and direct appropriate resources, the City can transform public investments into a more powerful part of the solution. We applaud Council Member Harris-Dawson for recognizing this opportunity by calling on the City to "include a prioritization of transit-oriented developments as it connects to affordable housing" (Homelessness and Poverty hearing, January 13, 2016.) Our third recommendation here pertains to equitable TOD land use policy.

SAJE

152 West 32nd Street, Los Angeles, CA 90007

Recommendation #3: Address the threats and opportunities of transit-oriented development (TOD) by establishing a set of equitable land use policies along existing and planned transit corridors.

The Alliance for Community Transit – Los Angeles (ACT-LA) coalition, of which SAJE is a member, has recommended a combined approach inclusive of incentives for the creation of new affordable housing and the preservation of existing affordable housing. As our transit system continues to expand, an equitable TOD policy regime can be a fundamental element of a homelessness prevention plan. Accompanying this letter is a policy memo that goes into greater detail on this approach. ACT-LA has worked with its 29-member organizations and residents from throughout the City to set a vision for how development can protect core transit riders from displacement while making our neighborhoods more economically vibrant.

Thank you for your consideration and leadership on these issues. Please do not hesitate to reach out to discuss these ideas further.

Sincerely,

Joe Donlin
Associate Director
Strategic Actions for a Just Economy

AFFORDABLE HOUSING AND QUALITY JOBS NEAR TRANSIT

Los Angeles stands at a crossroads. In the midst of a massive transit build-out, we are poised to become a more connected and sustainable city. However, only *equitable* land use development makes it possible to fulfill the great environmental, economic and social promises of transit. We must ensure a net gain of affordable housing and quality jobs available to public transit's core riders.

We don't need a one-size-fits-all approach. Each community should help shape its development. But certain principles – affordable housing, green space, walkable streets, and economic vitality – are important for all our communities. At this key moment, the City has an unparalleled opportunity to put these principles into practice. The Alliance for Community Transit – Los Angeles (ACT-LA) advocates a comprehensive equitable Transit Oriented Communities (TOC) Program in order to:

- **Create new affordable housing** near transit
- **Prevent displacement** of low-income residents in transit-served neighborhoods
- **Grow quality job opportunities** for local residents
- **Promote healthy, sustainable neighborhoods** that are pedestrian and bike-friendly
- **Ensure civic engagement** of core transit riders and transit-adjacent residents

I. ACT-LA proposes a comprehensive Transit Oriented Community (TOC) Program consisting of four land-use policy elements:

1. Amend LAMC Section 12.22 to create TOC Affordable Housing and Economic Mobility Incentives.

Affordable Housing Incentives: New residential and mixed-use developments in a TOC* are granted increased residential density, streamlined approval and/or reduced parking requirements in exchange for including affordable units. This encourages growth and development – for all income levels – in L.A.'s transit served communities. The affordable housing set asides should exceed state density bonus minimums and should include incentives for Very Low- and Extremely Low-Income units in order to be affordable to L.A.'s core transit riders, 70% of whom make less than \$25,000 per year.

Economic Mobility Incentives: New mixed-use and commercial developments within a TOC are granted incentives such as relaxed ground floor retail requirements, expedited approval, reduced parking requirements, etc. in exchange for providing community serving economic development benefits such as local/targeted hire, living wages, healthy food retail, and support for community-serving small businesses.

2. Amend LAMC Section 13 to create a TOC Overlay District.

A new supplemental use district or "TOC Overlay (TOCO) District" will establish standards and requirements for community-serving development and affordable housing preservation near transit. Without altering underlying zoning or use designations, the new district designation overlays additional equitable TOC standards, including bike/pedestrian and complete streets design standards, economic mobility provisions, and a "no-net-loss" anti-displacement program.

- All parcels in a TOCO District retain underlying zoning and density until new station area planning occurs.

* TOC designation would apply to a half-mile around fixed rail and high-use bus station areas.

- Enhanced design standards promote/require bike & pedestrian oriented uses/frontage.
- District includes standards/requirements and procedural mechanisms to encourage community-serving economic development, e.g. targeted hiring requirements for projects with City subsidy, etc.)
- Projects in a TOCO District are entitled to TOC Affordable Housing / Economic Mobility Incentive Program.
- District includes *performance-based standards for neighborhood stabilization*. For each TOCO District, the City will create and monitor an inventory of all affordable units and units subject to RSO. If there is a net loss, preservation policies will go into effect until the loss is reversed.

3. *Encourage community-driven TOC planning to implement equity standards.*

The above TOC Overlay District requirements may be established as *interim* standards until such time the TOC is subject to a completed Station Area Plan consistent with enumerated standards. A "Station Area Plan" may be a Transit Neighborhood Plan (TNP), Community Plan Implementation Overlay (CPIO), Specific Plan, or other community-led planning mechanism. This two-step process allows the city to establish baseline standards for equitable development, while retaining a local community-driven process for planning and zone changes.

4. *Ensure the integrity of the Transit Oriented Communities Program by instituting a citywide Public Benefit Zoning/Value Capture program.*

Direct financial subsidy and/or Zone changes, General Plan Amendments, and other discretionary land use entitlements that increase residential density or allow a residential use not previously allowed should include requirements for affordable housing.

II. ACT-LA supports complementary citywide affordable housing policies to enhance equity in TOCs and promote a more inclusive and sustainable Los Angeles.

On-Site Inclusionary Housing: Consider a requirement that a percentage of new *for-sale* housing units be made available to Low and Very Low Income households, with in-lieu fees and alternative compliance options. ACT-LA urges the City to advocate for state legislation to enable municipalities to enact inclusionary zoning programs for new rental units (i.e. "Palmer Fix").

New Funding Streams for Affordable Housing Preservation and Production: Consider new dedicated sources for funding for affordable housing, including potential tax increment from Enhanced Infrastructure Finance Districts or Community Revitalization Authorities, Redevelopment Residual Funds, and a Linkage Fee.

Preserve Existing Affordable Housing: ACT-LA supports new local policies to restrict demolitions and condo conversions and to preserve at-risk covenanted affordable units and public housing stock.

Expand and Protect Tenant Rights: ACT-LA belongs to the Renters Day LA Coalition and actively supports its citywide policy platform to protect tenants, including quality repairs, increased enforcement of RSO protections, and the creation of a rent registry.

Decriminalize Homelessness: ACT-LA supports the right to rest. When people lose their homes, they shouldn't lose their rights too. Allocate homelessness resources more wisely. Funds should be diverted from the criminalization of homelessness, which is costly and fruitless, to solving the crisis.

Feedback on City of LA Homeless Strategy Report

SSG-HOPICS

Prepared January 20, 2016

Strategy 4A: Strengthen CES Technology, Staffing and Standardization

Staffing Recommendation: Co-locate a 40-hour certified (per Evidence Code 1037-1037.8),

A city funded Domestic Violence Advocate at each CES hub, or at the very least each HFSS/FSC site. Just as HFSS hubs currently co-locate DPSS Eligibility Workers, DMH personnel, and DPH substance abuse counselors are co-located at each HFSS site, a DV Advocate/Counselor should also be co-located at each site.

Training Recommendation: Enlist local domestic violence experts to provide training to CES staff utilizing the state mandated 40-hour domestic violence curriculum, per Evidence Code 1037-1037.8, and following updated guidance from HUD.^[1]

Protocol Recommendation: Allow local domestic violence shelters to complete standardized CES assessments and other paperwork/applications/etc., rather than requiring that CES staff first complete this documentation, as part of the referral and services access process.

Technology Recommendation: The stated goal of improved data tracking, data sharing, MIS integration, and broader use of HMIS across agencies under CES should be treated differently when it comes to domestic violence victims. Unlike other homeless subpopulations, the need to protect victim safety and confidentiality trumps all other concerns related to system integration and efficiency.

Overall Recommendation: The stated goals under this strategy need to be adjusted to account for the special safety, confidentiality and service needs of domestic violence victims. The CES "plan" assumes that all populations should access CES in the same way, are entered into HMIS in the same way, can be case managed and matched to housing through CES in the same way, etc. The plan needs to ensure that domestic violence victims have equal access to housing resources through CES/HFSS. However,

the plan needs to recognize that the domestic violence system is an established system that is designed to meet the special needs of this high risk population. The goal, therefore, SHOULD NOT be to integrate CES/HFSS with the domestic violence system, but rather to identify and lay out strategies to better *LINK* the two systems so that domestic violence survivors can access housing resources, including housing location assistance and rental assistance.

Strategy 4B: Strengthen Departmental Support for Homeless Case Managers

Recommendation: Housing and Community Investment Department is conspicuously absent from the listed agencies/departments. Direct HCID to fund a DV Advocate/Counselor to be co-located at each CES site. Such a Counselor would assume the role of “CES navigator” for a victim of domestic violence, ensuring that each victim’s needs are appropriately assessed and that each victim is linked with all necessary services.

7.3.3 Transitional Housing

Recommendation: Though it’s true that HUD is de-emphasizing transitional housing, HUD’s shifting policy priorities are not a one-size-fits-all approach, as this statement suggests. The plan needs to better explain under what circumstances and for which populations transitional housing will remain an appropriate intervention, including for domestic violence victims. In particular, the plan needs to recognize transitional housing as a necessary and best practice for victims of domestic violence as distinct from rapid re-housing and Housing First models for other homeless populations.

General observation: The plan discusses transitional housing and rapid re-housing research findings (and LAHSA’s rapid re-housing experience to date, e.g., 7.6.4) as if they apply across the board. HUD has yet to present any research showing that rapid re-housing is more effective for victims of domestic violence than transitional housing. The plan needs to offer a more balanced presentation of the knowledge base to date.

7.7 Housing Needs for the Homeless

Recommendation: The shelter needs of domestic violence victims – both emergency shelter and transitional housing – cannot be lumped together with the needs of other populations, including homeless families, and assumed that the needs are the same. LAHSA should be directed to separately analyze and present the shelter and permanent housing needs of domestic violence victims including an analysis of existing services as well as additional services needed to adequately house and service this population.

Recommendation: The plan needs to specifically address current gaps in shelter needs among domestic violence victims and to cite salient findings from the City Controller’s October 2015 audit, including the sharp annual reductions in DVSO funding. Strategies include, but are not limited to, the following:

1) Restore DVSO funding, at minimum, to the FY 10-11 level of \$2.9 million; per HCIDLA's December 28, 2015 report to Council, DVSO funding only supports 11% of program funding, on average, per contracted project and hundreds of thousands of dollars in local shelter funding that had previously supported domestic violence shelters was reallocated to create the Homeless Families Solutions System.

2) Dedicate emergency funding to replace the \$671,000 in reallocated CoC transitional housing funding so that transitional housing beds in the city remain open and available to victims of domestic violence.

3) Create a plan to increase and fund the number of emergency and transitional beds available to at least 1000 beds within the next 24 months.

Similarly, the plan should recognize that bridge housing cannot be viewed, or utilized, as a one-size-fits-all model. For example, shelter stays may need to be beyond 90 days for certain individuals and families with special needs, such as victims of domestic violence who, for reasons of safety and trauma, may require longer shelter stays while permanent housing plans are being developed and implemented.

7.8 Youth Housing

Recommendation: Just as the plan has a separate strategy for Youth Housing, the plan should also have a separate strategy for Domestic Violence Housing. Part of this population specific plan needs to be a clearly stated recognition of the need for rental assistance resources dedicated to domestic violence victims. While rapid re-housing may not be a safe or appropriate intervention for most domestic violence victims, the need for rental assistance to end homelessness remains a common denominator across populations. Therefore, additional rental assistance resources that are "pumped into CES" should remain flexible enough to assist all populations, including those who are not being rapidly re-housed. This flexibility is also vitally important because all of the HUD Continuum of Care dollars that have been reallocated to rapid re-housing are statutorily restricted to homeless persons living on the streets or in emergency shelter; homeless persons in transitional housing are NOT eligible to be assisted by those resources. Other resources, including local resources, should be targeted for rental assistance for domestic violence victims.

[1] Recent Guidance from HUD on Coordinating Entry and Domestic Violence calls for training beyond safety planning. Per FAQ #4: "All coordinated entry staff should be trained on the complex dynamics of domestic violence, privacy and confidentiality, and safety planning, including how to handle emergency situations at an access point(s), whether a physical or virtual location. CoCs should also partner with their local victim service provider agencies to ensure that trainings for relevant staff are provided by informed experts in the field of

domestic violence, dating violence, sexual assault, stalking, and human trafficking." https://www.hudexchange.info/resource/4831/coordinated-entry-and-victim-service-providers-faqs/?utm_source=HUD+Exchange+Mailing+List&utm_campaign=ed91769331-Coordinated+Entry+and+Victim+Service+Provider+FAQs&utm_medium=email&utm_term=0_f32b935a5f-ed91769331-18775405

**City of Los Angeles Comprehensive Homeless Strategy
Downtown Women's Center Feedback
January 20, 2016**

Introduction

We are heartened by the recent stakeholder engagement process and subsequent Comprehensive Homeless Strategy released by the City of Los Angeles – the increased attention and efforts towards addressing homelessness in our city is desperately needed. We also applaud the City's openness to collaborating with the County and to including service providers in the planning process. We are pleased to see that the strategy grounds efforts in nationally recognized models and best practices in critical areas such as housing, health and support services, social enterprise and workforce development, and city-county coordination.

However, the lack of recognition of unaccompanied homeless women as a subpopulation¹ with specific vulnerabilities and service needs is glaring and troubling. Data² tells us that the characteristics and vulnerabilities of homeless women are unique, and thus require specific attention and services. However, a woman experiencing homelessness in Los Angeles currently enters a service system designed by and for the majority. These services often fail to appropriately address her higher likelihood of having survived violence, her unique healthcare or job-training needs, or the ways in which her goals for her future may vary from those of a homeless man.

At this tipping point in our city's approach to homelessness, we have the opportunity to make a significant leap forward. Just as with youth and veteran homelessness before, a commitment to and success in addressing a subpopulation opens doors to increased community will, resources, and visibility for the greater population. We urge the City to lead the nation by example in addressing the needs of homeless women. If you design for the majority, the minority falls through the cracks – the homeless women of greater Los Angeles deserve to be seen.

Topline Recommendations

1. Recognize women as a vulnerable subpopulation among homeless individuals.

Just as (very rightly) veterans and youth have been identified as subpopulations with unique vulnerabilities, so too must unaccompanied women be recognized. DWC's experience tells us that homeless women are a tremendously resilient population in the face of staggering hardship.

¹ 100,184 individuals (28 percent) of the nation's homeless population are *unaccompanied* women (*Annual Homeless Assessment Report, 2015*), meaning adult women who are not accompanied by children or dependents and who do not qualify for family services. 8,102 individuals (32 percent) of the city's homeless are women, and 13,587 (33 percent) of the county's homeless are women (*Greater Los Angeles Homeless Count, 2015*).

² The US Conference of Mayors (*National Law Center on Homelessness and Poverty, 2012*) states that 44% of the cities surveyed identified DV as a major cause of homelessness. Half of all homeless women and children have reported experiencing physical violence, and 92% of homeless mothers have reported experiencing physical or sexual assault. Among women in Skid Row, 61% have experienced domestic violence, and 38% of survivors came directly to Skid Row after suffering abuse. Half of women in Skid Row have experienced sexual assault; 14.5% experienced sexual assault in the last year. Nearly one third (31.5%) have felt the need to perform a sexual favor in exchange for food, protection, cash, or other needs (*Downtown Women's Needs Assessment, 2014*).

However, they deserve services that address the prevalence of trauma in their lives, which is often compounded by the relative lack of safety they experience in shelters and on the streets.

Recommendations

- We recommend that unaccompanied women be recognized within the city strategy as a subpopulation with specific needs, such as Transition Age Youth and LGBTQ youth. We urge you to include strategies specific to unaccompanied women included in the plan.
- We recommend that data on women's homelessness be prioritized and made publicly available. A first step would be de-aggregating the 2016 Homeless Count by gender across data points.
- We recommend that there be more dedicated funding streams for unaccompanied women, just as the plan lays out dedicated strategy for youth housing. One example at the county level is the \$2 million in funding recently granted to the Department of Health Services for rapid rehousing for women.
- We recommend that the City attach specific metrics and targets to reducing homelessness among women, as has been done for veteran and youth homelessness.

2. Ensure women's needs are being fully met through housing and services in LA City.

We know that 8,102 of the city's homeless population are women, yet beyond this basic data, there is a dearth of information on how services and housing are meeting the needs of this particular subpopulation. Having data on homelessness de-aggregated by gender is an essential step to knowing whether women's needs are being met, and to developing targeted and thereby effective approaches to ending homelessness for women.

Recommendations

- We recommend that LAHSA track housing assignments by gender in the Coordinated Entry System (CES), to see if women are accessing housing at a proportionate pace to men. The Downtown Women's Center is a CES entry point for SPA 4. The Downtown Women's Center is a CES entry point for SPA 4. In 2015, we entered 150 women into CES and 27 were matched to housing (18%). Since the start of CES in 2013, we have entered 599 women and 62 have been matched to housing (10%).
- We recommend that the housing available through CES be expanded to include more permanent supportive housing and low-income units set aside specifically for women.
- We recommend that the City, County, and LAHSA add to their criteria for funding decisions the need to demonstrate how applicants are effectively addressing the unique needs of unaccompanied women experiencing homeless.

3. Require that Trauma-Informed Care be implemented across all service provision.

Among the service models critical to ensuring long-term success in ending homelessness for all individuals is Trauma-Informed Care (TIC). This best practice recognizes the traumatic impact of homelessness on an individual's physical and mental health, and hinges on asking, "What happened to you?" rather than, "What is wrong with you?" Given the level of training and outreach outlined in both the City and County plans, it is crucial that TIC be applied at all levels of service provision. When implemented throughout service delivery, TIC leads to more long-term health and housing outcomes for survivors of trauma (*Shelter from the Storm: Trauma-Informed Care in Homelessness Services Settings*, 2010). In particular when ending homelessness for women, we need a service delivery

system that recognizes and is sensitive to the prevalence of past and ongoing trauma in individuals' lives.

Recommendations

- We recommend that TIC be made a grant requirement for homeless service providers funded through the City, County, and LAHSA. We believe utilization of the model would ensure the strongest outcomes and the greatest likelihood of ending the cycle of homelessness not just for women, but for all homeless individuals.
- We recommend that TIC be integrated into all the outreach and engagement strategies e.g. CES intake managers, "C-3" Teams, LAPD.

4. Ensure that Workforce Development programs address women's specific job needs.

Workforce development and job readiness programs within homeless services have traditionally been geared towards men. If we want to encourage success in ending homelessness for women, we must invest in long-term solutions that serve their job needs. This includes programs that serve older populations re-entering the workforce and programs that recognize and support the ancillary benefits of workforce training (health and wellbeing, community building) in addition to standard metrics such as increased income.

Recommendations

- We recommend continued regional advocacy for federally-funded programs such as LA:RISE (administered through the Los Angeles Economic and Workforce Development Department), that specifically address hard-to-reach populations and are designed to meet the job readiness needs of this under-supported population.
- We recommend more direct collaboration and alignment between employment and workforce development and homelessness sectors in creating opportunities for high-barrier individuals (including women).
- We recommend that recognition that employment programs be both about the health and well-being of individuals as well as increased income

5. Continue to look at the bigger picture – and fund the solutions.

The City's plan takes an unprecedented look at the coordination and strategy needed to end homelessness, including addressing challenges with the CES, supporting landlord engagement and incentives, and better coordination of housing location services. This top-level thinking and focus on long-term solutions is critical. So, too, is a dedicated revenue source to pay for this most sustainably. We support full funding for the Affordable Housing Trust Fund and the establishment of a new Homeless Services Trust Fund.

Recommendations

- We recommend calling for a motion to seek out a dedicated funding source, such as the new Homeless Services Trust Fund.
- We recommend not waiting for the dedicated revenue source to shift budgets, and making sure the annual investment laid out in the plan is included in the 2016/2017 city budget.

Next Steps

The recommendations made above by the Downtown Women's Center are not heavy-cost items, and funding these strategies will ultimately result in savings down the line. Once the plans go into implementation, governance will take on great importance. Continuing to engage service providers

and individuals with lived experience will be crucial to ensuring accountability and success of the plans. The Downtown Women's Center looks forward to continuing to work with the City on implementation of their strategies to end homelessness for good.