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# CITY OF LOS ANGELES

CALIFORNIA



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MAYOR

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PUBLIC WORKS

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October 31, 2019

The Honorable Herb J. Wesson, Jr.  
President  
Los Angeles City Council

c/o Holly L. Wolcott  
City Clerk  
City Hall Room 360

## BRIDGE HOUSING FACILITY 100 E. SUNSET AVENUE (CF 18-0510) CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION (NOE)

Dear President Wesson and Honorable Members:

On June 29, 2018, the City Council (Council) adopted a report from the Homelessness and Poverty Committee, dated June 20, 2018, relative to the evaluation of development on the above-referenced property for the temporary use as bridge housing for those experiencing homelessness. On December 11, 2018, Council determined the project was categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Article 19, Sections 15301, Class 1(b), 15304 Class 4(a)(b)(e), and Class 32; and the City of Los Angeles CEQA Guidelines, Art. III, Sec. 1, Class 1 (2)(12), and Class 4(1)(3)(6). On September 26, 2019, a new exemption, California Public Resources Code, Section 21080.27, was signed into law.

### **RECOMMENDATION**

Staff recommends that Council determine the Crisis and Bridge Housing facility on 100 E. Sunset Avenue, which allows the development and lease of the property as temporary shelter for those experiencing homelessness, is statutorily exempt under the new exemption, Public Resources Code, Section 21080.27, which was signed into law on September 26, 2019. Please refer to the attached NOE.

If you have any questions, please contact Allan Kawaguchi at (213) 485-4687.

Sincerely,

For Gary Lee Moore, PE, ENV SP  
City Engineer

GLM/AK/mem

Q:\AM\Word\Transmittal to Council CD 11 100 E Sunset CEQA NOE



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

**NOTICE OF EXEMPTION**  
(Articles II and III – City CEQA Guidelines)

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

<b>LEAD CITY AGENCY AND ADDRESS:</b> c/o Bureau of Engineering, 1149 S. Broadway, MS 939, Los Angeles, CA 90015	City of Los Angeles 11	<b>COUNCIL DISTRICT</b>
<b>PROJECT TITLE:</b> Bridge Housing on 100 E Sunset Avenue	<b>LOG REFERENCE</b> CF 18-0510	

**PROJECT LOCATION:** 100 E Sunset Avenue, Venice CA 90293, Assessor's Parcel Number 4286-015-900, T.G.671 G5

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT**

This Notice of Exemption is being filed for the purpose of providing notice required by Public Resources Code Section 21080.27, subd. (c). As identified in the previous approval by City Council on December 11, 2018, the project involves constructing a temporary homeless emergency shelter with tent, trailer, and outdoor uses on a Los Angeles County Metropolitan Transportation Authority-owned parcel leased by the City and operated by the City through Los Angeles Homeless Services Authority or another vendor. (See prior project approval at City Council File No. 18-0510 (Project).)

The prior City Council Action on December 11, 2018 (CF 18-0510) determined the project was categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Article 19, Sections 15301, Class 1(b), 15304 Class 4(a)(b)(e), and Class 32; and the City of Los Angeles CEQA Guidelines, Art. III, Sec. 1, Class 1 (2)(12), and Class 4(1)(3)(6).

On \_\_\_\_\_, City Council adopted a motion amending the prior action to adopt a resolution which further determined that the Project is additionally exempt from the California Environmental Quality Act under a new exemption, Public Resources Code, Section 21080.27, which was signed into law on September 26, 2019.

<b>CONTACT PERSON:</b> Maria Martin	<b>TELEPHONE NUMBER:</b> 213-485-5753		
<b>EXEMPT STATUS: (Check One)</b>	<u>CITY CEQA GUIDELINES</u>	<u>STATE CEQA GUIDELINES</u>	<u>CA PUBLIC RESOURCES CODE 21080.27</u>
<input checked="" type="checkbox"/> STATUTORY			
<b>JUSTIFICATION FOR PROJECT EXEMPTION:</b> This project is statutorily exempt under Public Resources Code Sections 21080.27, see attached narrative, which is alternatively provided in the City's Council File No. 18-0510.			
<b>IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING</b>			
SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Group		DATE:
FEE: \$75.00 _____	RECEIPT NO.	REC'D BY	DATE

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

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## REVISED CATEGORICAL EXEMPTION NARRATIVE

### I. PROJECT DESCRIPTION

This Notice of Exemption document is prepared for the purpose of providing notice required by Public Resources Code Section 21080.27, subd. (c). This emergency shelter project was previously approved by the City Council on December 11, 2018, and a Notice of Exemption was filed with the County Clerk on December 12, 2018, which noted the project was exempt under CEQA Guidelines Sections 15301(b), 15304(a)(b)(e), and Class 32, City of Los Angeles CEQA Guidelines, Classes 1(2)(12) and 4(1)(3)(6). The Notice of Exemption and narrative are prepared for the consideration of a motion to amend the prior project approval action by adopting a Resolution determining the project was additionally exempt from CEQA pursuant to Public Resources Code Section 21080.27 [AB 1197], which was signed into law on September 26, 2019. The resolution does not change any of the prior approvals or determinations in any way.

As identified in the previous approvals by City Council on December 11, 2018 (Council File No. 18-0510), the following project description was provided for this emergency shelter project:

The project is a temporary homeless shelter that will operate for up to 3 years and will provide emergency shelter, hygiene, storage, food services and case management to homeless individuals. The site property is located within the Venice Community Plan Area of the City of Los Angeles in Council District 11 (CD 11) 100 East Sunset Avenue, Venice, CA, 90291, Assessor's Parcel Number (APN) 4286-015-900, as shown in *Figure 1 - Project Location Map* and *Figure 2 – Assessor's Parcel Map* (Reference 1).

The project design plan includes a new single-story 9,900 square-foot modular tent structure, nine youth trailers that total 6,480 square feet, on a Los Angeles County Metropolitan Transportation Authority (Metro) owned parcel that includes one (1) lot. The lot totals approximately 130,505 square feet. The project design includes up to 100 beds within the tented area, 54 beds within the youth trailers, an approximately 840- square-foot hygiene trailer, an approximately 840-square-foot youth hygiene trailer, 1,920 square feet of storage containers, a free-standing shade structure, an approximately 4,800-square-foot administration trailer, an approximately 3,420-square-foot exterior dining area and approximately 1,960 square feet for a 154 60-gallon bin storage room. Floor space totals approximately 24,780 square feet, including the temporary tent structure. Outside areas include an approximately 1,980-square-foot outdoor pet area, bike racks, a smoking area and general open space. There are 111 parking spaces on the site. Approximately 20 parking spaces are proposed for on-site parking for the proposed facility. Minor alterations to existing utilities and 380-linear-feet of street and onsite fencing fence are also included in the project. The project includes the removal of a 200 linear foot long fence. Minimal grading at less than a 10 percent slope will occur to replace existing asphalt, to install utilities and tent footings.

The project site is zoned M1-1 with a Limited Manufacturing land use. The site is located just northwest of the intersection of Main Street and Abbot Kinney Boulevard and is bounded by Main Street, Sunset Avenue, Pacific Avenue, and Thornton Place. Currently, the project site vacant, with a large paved area and one building near the southern property boundary.

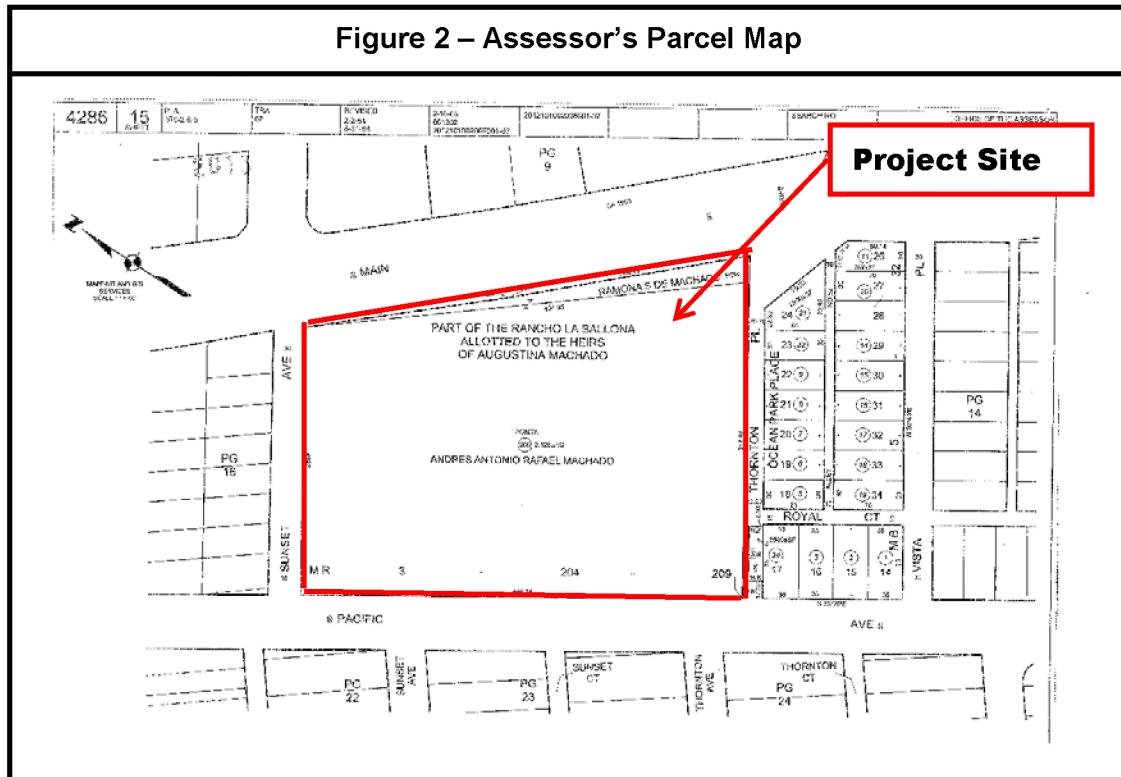
Parcels that surround the site on the north, south and west are zoned for residential land uses. Parcels to the east are zoned for industrial land uses. Venice Beach is one block to the west.

## Bridge Housing on 100 E Sunset Avenue

The proposed project site encompasses approximately 130,505 square feet, is comprised of one lot and is irregular-shaped. The project is located in a Transit Priority Area, and is generally bounded by Sunset Avenue (and Rose Avenue thereon) to the north, Thornton Place (and Venice Boulevard thereon) to the south, Pacific Avenue to the west and Main Street to the east. Main Street and Pacific are both designated Avenue II (i.e., right of way width of 86 feet and roadway width of 56 feet) in the City of Los Angeles Mobility Plan. The project site is located approximately 700 feet from the Pacific Ocean within the Single Jurisdictional California Coastal Zone.



**Figure 2 – Assessor’s Parcel Map**



The closest transit stop is on the east side of the project site on Main Street. Regional transit access to and from the site to Downtown Los Angeles Union Station is via Venice Boulevard. The project is consistent with the Los Angeles Municipal Code and the City of Los Angeles General Plan (General Plan) and will not significantly impact environmental resources.

The proposed project will be operated by the City of Los Angeles through Los Angeles Homeless Services Authority, or another City vendor. Full staff will be onsite during daytime operational hours to provide services. The site will be continuously staffed, 24 hours a day, with security personnel, and provided with security directional lighting. Standard conditions, including a construction management plan incorporated into the project design, will apply. The project will not significantly impact environmental resources.

The project design shall comply with a construction management plan that includes project design conditions, as necessary, to protect the health, safety, or convenience of affected sensitive receptors, located in the neighborhood that surrounds the project. The construction management plan and appropriate design conditions have been selected from the *City of Los Angeles, Bureau of Engineering, Master Specifications, Division 01, General Requirements, Section 01562, Part 1.1.C.* Selected design conditions are detailed further under applicable resource area analyses (Reference 2). In addition, unless otherwise stated, the proposed project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards including but not limited to:

- Los Angeles Municipal Code
- Bureau of Engineering Standard Plans
- Standard Specifications for Public Works Construction

- Work Area Traffic Control Handbook
- Additions and Amendments to the Standard Specifications for Public Works Construction

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

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

### A. City of Los Angeles Declaration of a Shelter Crisis

Public Resources Code, section 21080.27(a)(2) requires that emergency shelters be approved during a shelter crisis under Government Code, section 8698.2. The City of Los Angeles (the City) City Council has declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (Council File No. 15-1138-S33), which is currently in effect (Council File No. 15-1138-S40 [June 14, 2019]).

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

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

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

**Service-Enriched Shelter, Case Management Connecting to Services.** The requirements are met by this project for a “service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities, while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.” This project provides temporary housing through the development and operation of a shelter, with case managers staffing the facility that provide connections to these homeless services and assistance for the occupants. This is one of the fundamental purposes of this shelter project.

For example, the project's programs include Trauma Informed Care policies and procedures that involve understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both participants and providers, and helps participants rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Services create a culture of nonviolence, learning, and collaboration.

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

Per LAHSA's 2018-2019 Bridge Housing Scope of Required Services (SRS), service providers that oversee an *A Bridge Home* shelter must provide case management services and develop a Housing Stability Plan with each participant. A Bridge Home program implements a case management and service plan known as *Housing-Focused Case Management and Support Services (HFCMSS)*. HFCMSS includes but is not limited to: support with completing housing applications, accompanying the participant to housing appointments and/or leasing appointments, and other support associated with the housing placement process. The primary objective of HFCMSS is to extend support to participants through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect participants to permanent housing. Case Management should make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay in the Bridge Housing bed.

HFCMSS connects participants to a Housing Navigator who assists participants to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). Usually a case manager is assigned to a participant when the participant enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists participants with Housing Navigation services. Housing Navigation services are available to participants to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing within the general ninety (90) days of the *A Bridge Home* stay. Housing Navigation services may be provided onsite, and may also require participants' to be accompanied to off-site appointments.

Case management must be conducted on a regular and routine basis and must be routinely documented. The content and outcome of case management meetings with participants are entered into a housing management information system with case notes that are tracked in the system. Housing-focused case management sessions are dedicated to assessing and reassessing needs, educating participants on community resource opportunities, developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

**Housing First.** The Project is a "Housing First" shelter pursuant to Government Code Section 65660 and, in being a Housing First shelter, the project also complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law) as required by Government Code Section 65662 (discussed further below). Housing First means the evidence-based model that uses housing as a tool, rather than a reward, for

recovery from homelessness, and that centers on providing or connecting homeless people to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services.

“Housing First” also includes time-limited rental or services assistance, so long as the housing and service provider assists the recipient in accessing permanent housing and in securing longer-term rental assistance, income assistance, or employment. For time-limited, supportive services programs serving homeless youth, programs should use a positive youth development model and be culturally competent to serve unaccompanied youth under 25 years of age. Providers should work with the youth to engage in family reunification efforts, where appropriate and when in the best interest of the youth. In the event of an eviction, programs shall make every effort, which shall be documented, to link tenants to other stable, safe, decent housing options. Exit to homelessness should be extremely rare, and only after a tenant refuses assistance with housing search, location, and move-in assistance.

Although time-limited rental and supportive services programs may not be applicable to the City’s shelters, the overall continuum of care uses family reunification and positive youth development among the strategies to address the unique needs of unaccompanied homeless youth. Regardless, the shelters do provide a strengths-based approach through LAHSA’s scope of required services, which complies with the positive youth development model by assisting participants to identify their own strengths, develop coping skills, and build resiliency. The shelters, including this project, also provide initial efforts for family reunification by requiring that the first conversation upon entry should be to assess for the possibility of diversion so as to assist the person self-resolve their housing and/or make reasonable efforts to re-connect with supportive family and/or friends who could temporarily or permanently house the participant, rather than reside in the Bridge Housing. If resources are needed to successfully divert a person from entry into the homelessness system, a referral must immediately be made to a CES Diversion/Prevention program. In order to identify other permanent housing options, Contractor should continue to have Problem Solving conversations with the participant while residing in Bridge Housing. More broadly, the project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting participants to exit to safe and stable housing. Thus the aspirational goals in the Housing First statute related to homeless youth programs are met to the extent they are applicable.

This project additionally meets the other above-noted Housing First requirements. The A Bridge Home program shelters are operated by service providers coordinated through the Los Angeles Homeless Services Authority (LAHSA). All service providers must comply with LAHSA’s Scope of Required Services, Program Standards, and Facility Standards. Per LAHSA’s 2018-2019 Program Standards, all eligible participants are to be served with a Housing First approach. The basic underlying principle of LAHSA’s System Components is that access to housing is the primary need for its program participants. Services are voluntary and not required to enter into a shelter. Participants will not be rejected or exited from participation in Bridge Housing due to any unnecessary barriers.

The City’s A Bridge Home program is intended to be a Housing First program focused on quickly moving people experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. The basic underlying Housing First principle is that persons are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. The City’s shelters developed under the A Bridge Home program, including this emergency shelter

project, provide a safe, low barrier, housing-focused, and homeless services support in a twenty-four (24) hour residence to help people who experience homelessness that meet the above-noted requirements for Housing First. One of the core components of the Housing First model is that longer-term housing accepts referrals directly from shelters. The City's shelters, including this project, are primarily focused on connecting, transitioning, and referring homeless people into such permanent housing as quickly as possible in the Housing First model, and accepting occupants through the crisis response system. The intention of this emergency "A Bridge Home" shelter project is to provide participants with some stability, so that they can more easily maintain contact with housing navigation and case management services and facilitate safe and supportive housing placement. Services in the City's shelters, including this project, are never mandatory and cannot be a condition of obtaining the housing intervention. The Venice Bridge Home will provide temporary housing, case managers and Housing Navigators staffed at the facility who provide connections to homeless services for the occupants. Based on the above-noted information, the Venice Bridge Home emergency shelter, meets the Housing First requirements relative to AB 1197.

**Low Barrier.** "Low Barrier" means the shelters use best practices to reduce barriers to entry, including but not limited to, the presence of partners (if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth); pets; storage for possessions; and privacy (such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms). The City's shelters, including this project, meet these requirements.

In the Venice shelter, partners are allowed to cohabitate areas that are not population-specific, although sleeping in separate cubicles. The tent structure living area has 100 beds for adults, separated into men's and women's quarters, where they will not be able to share the same bed but can live on site together at the same time. Multiple outside common areas allow couples to spend time together.

The Venice Bridge Home is pet friendly. Participants are allowed to bring their pets to the shelter and live with them inside their living area. The facility includes an outside pet relief area so that owners can bring their pets to use the restroom 24 hours a day. However, there is no pet play area onsite. Therefore, the Venice Bridge Home facility allows for pets and provides pet friendly facilities for participants who choose to be accompanied by their pets. As shown on prior site diagrams, and Attachment A – Project Site Plan, the Venice Bridge Home includes pet relief area.

The Venice Bridge Home has bin-storage for personal possessions. Every participant who lives at the Venice Bridge Home will have their own personal storage bin for their possessions. The facility is designed with approximately 1,960-sf of bin storage space that fits approximately 154 60-gallon storage bins. Separate storage areas for adults and youth are both located outside the adult sleeping quarters tent structure. A harm reduction program design is used at the site and includes providing lockable safe boxes for participants to discreetly lock and store personal property before entering the shelter. Personal possessions are processed through an area called "bin storage sorting areas" located next to the bin-storage space. Therefore, the Venice Bridge Home facility allows for the storage of possessions using a harm reduction program design. As noted in Attachment A – Project Site Plan and the prior site diagrams, the Venice Bridge Home includes bin-storage and bin-storage sorting areas.

The Venice Bridge Home facility is designed to provide privacy to participants. Hygiene trailers for adults and youth are separated and provide privacy through individual stalls. Further, adult

and youth sleeping quarters are separate. The adult beds are located within the large tent structure. There are separate men's and woman's sleeping quarters within the adult tent structure. The youth beds are disbursed between four small trailers and will also be gender specific. The youth trailers are located on the northern end of the facility. Each bed in both the adult and youth sleeping quarters is in a cubicle surrounded by privacy partitions in a dormitory setting. No guests will be allowed inside the sleeping quarters to allow for privacy. Therefore, the Venice Bridge Home facility is managed and designed to allow for the privacy of participants. As noted in Attachment B – Project Feasibility Plans and prior site diagrams, the Venice Bridge Home design allows for privacy. Cubicle spaces are provide to afford the occupants privacy between the partitions.

The Venice Bridge Home facility uses low barrier best practices that reduce barriers to entry. They include the allowance for presence of partners, pet friendly facilities, harm reduction storage areas for possessions, and is managed and designed for individual's privacy. All of the City's Bridge Home program emergency shelters, including the Venice Bridge Home project, meet these requirements. Therefore, none of the noted conditions would preclude access to the project, and the project is considered bridge housing that is "low barrier" within the meaning of Government Code Section 65660 and AB 1197.

In sum, based on the above-noted information, which is additionally explained and provided with additional details in the documents from LAHSA cited in the Reference section to this document, the project meets the definition of Low Barrier Navigation Center set forth in Government Code Section 65660.

### C. The Project Meets the Requirements of Government Code Section 65662

Under AB1197, emergency shelters must meet the four requirements identified in Government Code Section 65662(a) through (d), which are each discussed in turn in this section.

**Connecting to Permanent Housing through a Services Plan.** Government Code Section 65662(a) requires that Low Barrier Navigation Centers offer services to connect people to permanent housing through a services plan that identifies services staffing. This project meets that requirement. As noted above, the project includes housing-focused case management sessions that involve developing Housing Stability Plans, scheduling appointments, and providing necessary follow up to ensure housing stability plans are progressing on schedule and needs are adequately being addressed.

The Housing Stability Plan is the participant's service plan that summarizes the participant's housing goals, services needed, what will be provided, actions that need to be taken (by staff and the participant), and referrals that need to be made. Case managers develop the services plan in coordination with the participant right after intake and assessment, track the plan in a homeless management information system, and revise the plan as the person's situation changes and steps are completed or revised accordingly.

Participants are assisted with a range of activities that address the stated goals of the participant in the Housing Stability Plan, including but not limited to:

- Accessing personal identification (For quick referral to permanent housing)
- Accessing certification of the current income (For quick referral to permanent housing)
- Mainstream Benefits
- Substance Abuse services

- Mental Health Services
- Health Services
- Vocational Services
- Employment Services
- Educational Support
- Legal Services
- Life Skills Development
- Independent Living Program for Youth
- Transitional Housing Program for Youth
- CES and CoC Rapid Re-Housing Program
- Housing Navigation Assistance
- CoC Permanent Supportive Housing
- LA County Department of Health Services, Housing for Health or Housing and Jobs Collaborative
- LA County Department of Health Services, Countywide Benefits Entitlement Services Team
- LA County Department of Mental Health, Countywide Housing Assistance Program
- Veterans Administration Housing Programs
- Housing Opportunities for Persons with Aids (HOPWA) Housing
- Crisis Housing for Unaccompanied Youth
- Youth Family Reconnection Program

Accordingly, A Bridge Home programs must make attempts to create plans which minimize extraneous, inordinate, or superfluous action steps, including requiring participants to rapidly acquire new knowledge or skills, or make significant or simultaneous changes, in order to obtain permanent housing placement. Progress and problems implementing the plan are reviewed and updated frequently.

**Coordinated Entry System.** Government Code Section 65662(b) requires Low Barrier Navigation Centers to be linked to a coordinated entry system allowing staff and co-locating staff to conduct assessments and provide services to connect people to permanent housing. All City of Los Angeles homeless shelters, including this project, are linked to the Los Angeles County Coordinated Entry System, a centralized or coordinated assessment system designed to coordinate program participant intake, assessment, and referrals. The residents are prioritized through the coordinated entry system in the Los Angeles County Coordinated Entry System for safe and supportive housing resources. The City's A Bridge Home program collaborates with Los Angeles County Case Entry System and provides case management services to program participants through a Housing Stability Plan. A Bridge Home case managers must develop a Housing Stability Plan in coordination with the participant right after intake and assessment. The Housing Stability Plan must be tracked in a Homeless Management Information System (HMIS) along with the date of completion.

The A Bridge Home program collaborates with Los Angeles County Case Entry system Housing Navigators and case managers from other outside agencies to provide case management services to program participants. Los Angeles County Coordinated Entry System case managers work with participants and assist by facilitating services appointments; and then eventually help them find permanent housing.

**Compliance with Welfare and Institutions Code.** Government Code Section 65662(c) requires Low Barrier Navigation Centers comply with Chapter 6.5 of Division 8 of the Welfare and Institutions Code, which specifies the Housing First requirements. As noted above, the

City's A Bridge Home shelters, including this project, are Housing First shelters, and thus they comply with this requirement.

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

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

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

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

#### D. The Project is in a Qualified Location Under AB 1197

AB 1197 requires that the site be located in "either a mixed-use or nonresidential zone permitting multifamily uses or infill site...." (Public Resources Code section 21080.27(a)(2).) As noted in the memorandum provided by the City's Planning Department dated October 30, 2019, the project is considered an infill site because the site's perimeter is surrounded by qualified urban uses. The site consists of three lots that create a mostly rectangular-shaped area of approximately 136,156 square feet with frontages on all sides on Sunset Avenue, Main Street, Thornton Place, and Pacific Avenue. The site is surrounded by residential zoned lots with

residential uses along Sunset Avenue, Thornton Place, and Pacific Avenue. The other side of Main Street is zoned industrial, but it is primarily composed of residential and commercial office uses. The other use on the other side of Main Street is a public parking lot that appears to be primarily used for a nearby Gold's Gym. Therefore, the site meets the requirement that at least 75% of the perimeter be surrounded by qualified urban uses.

E. The Project Involves Qualified Funding Under AB 1197

Public Resources Code Section 21080.27(a)(2)(A)-(D) exempts emergency shelter projects from CEQA which have at least a portion of the funding from qualified sources. As noted in the original approval documents for this project, in Council File No. 18-0510 (the communication from the City's Homelessness and Poverty Committee members, dated December 5, 2018), funding for the project is at least in part from "funds being appropriated from the Homeless Emergency Aid Program (HEAP)...." On December 11, 2018, the City Council approved that recommendation for the funding. Because the "Homeless Emergency Aid program" is a qualified funding source under Public Resources Code Section 21080.27(a)(2)(A), the funding requirement under AB 1197 is met.

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

Public Resources Code Section 21080.27(b)(1), exempts from CEQA "any activity approved by or carried out by the City of Los Angeles in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles." This project involves an emergency shelter, as described above, which is located in the City of Los Angeles. The City will be constructing the emergency shelter for this project and approving funding and contracts for the construction and operation of the emergency shelter. Therefore, the City's actions are in furtherance of providing emergency shelters in the City of Los Angeles, and qualify for exemption from CEQA under AB 1197.

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

Public Resources Code Section 21080.27(b)(2), exempts from CEQA certain activities by specified Eligible Public Agencies. The Eligible Public Agencies are, as follows: (A) The County of Los Angeles; (B) The Los Angeles Unified School District; (C) The Los Angeles County Metropolitan Transportation Authority; (D) The Housing Authority of the City of Los Angeles; (E) The Los Angeles Homeless Services Authority; (F) The Los Angeles Community College District; (G) The successor agency for the former Community Redevelopment Agency of the City of Los Angeles; (H) The Department of Transportation; and (I) The Department of Parks and Recreation. AB 1197 exempts any action by such Eligible Public Agencies "to lease, convey, or encumber land owned by that agency, or to any action taken by an eligible public agency to facilitate the lease, conveyance, or encumbrance of land owned by that agency, or to any action taken by an eligible public agency in providing financial assistance, in furtherance of providing emergency shelters or supportive housing in the City of Los Angeles."

This project involves The Los Angeles County Metropolitan Transportation Authority leasing its property to the City of Los Angeles in furtherance of the City building and operating an emergency shelter in the City of Los Angeles. Therefore, Los Angeles County Metropolitan Transportation Authority's action to lease its property is exempt under AB 1197.

**III. CONCLUSION**

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

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## REFERENCES

1. LAHSA, 2019-2020 *Bridge Housing Program Scope of Required Services (SRS)*, September 1, 2019, <https://www.lahsa.org/documents?id=2624-scope-of-required-services-srs-bridge-housing.pdf>.
2. LAHSA, *Join HMIS*, last visited October 30, 2019, <https://www.lahsa.org/hmis/join-hmis>
3. LAHSA, *About HMIS*, last visited October 30, 2019, <https://www.lahsa.org/hmis/about>
4. LAHSA, *HMIS Policies and Procedures*, page 12, March 19, 2018, <https://www.lahsa.org/documents?id=1128-la-hmis-policies-and-procedures.pdf>
5. LAHSA, *HMIS Intake and Enrollment Form*, December 1, 2018, <https://www.lahsa.org/documents?id=1125-form-1125-hmis-intake-and-enrollment.pdf>
6. LAHSA, *2018-2019 LAHSA Program Standards*, June 22, 2018, <https://www.lahsa.org/documents?id=2280-2018-2019-lahsa-program-standards.pdf>
7. LAHSA, CA-600 CoC Registration FY2016, Sept. 12, 2016, p. 45, <https://documents.lahsa.org/programs/supernofa/2016/FY2016CoCApplication.pdf> [family reunification and positive youth development programs].
8. City of Los Angeles, Department of City Planning, Memo, *100 E. Sunset Avenue; AB 1197 Location Requirements*, October 30, 2019.9. City of Los Angeles, Mayor Eric Garcetti, *Executive Directive 24, Building “A Bridge Home,”* May 30, 2018.

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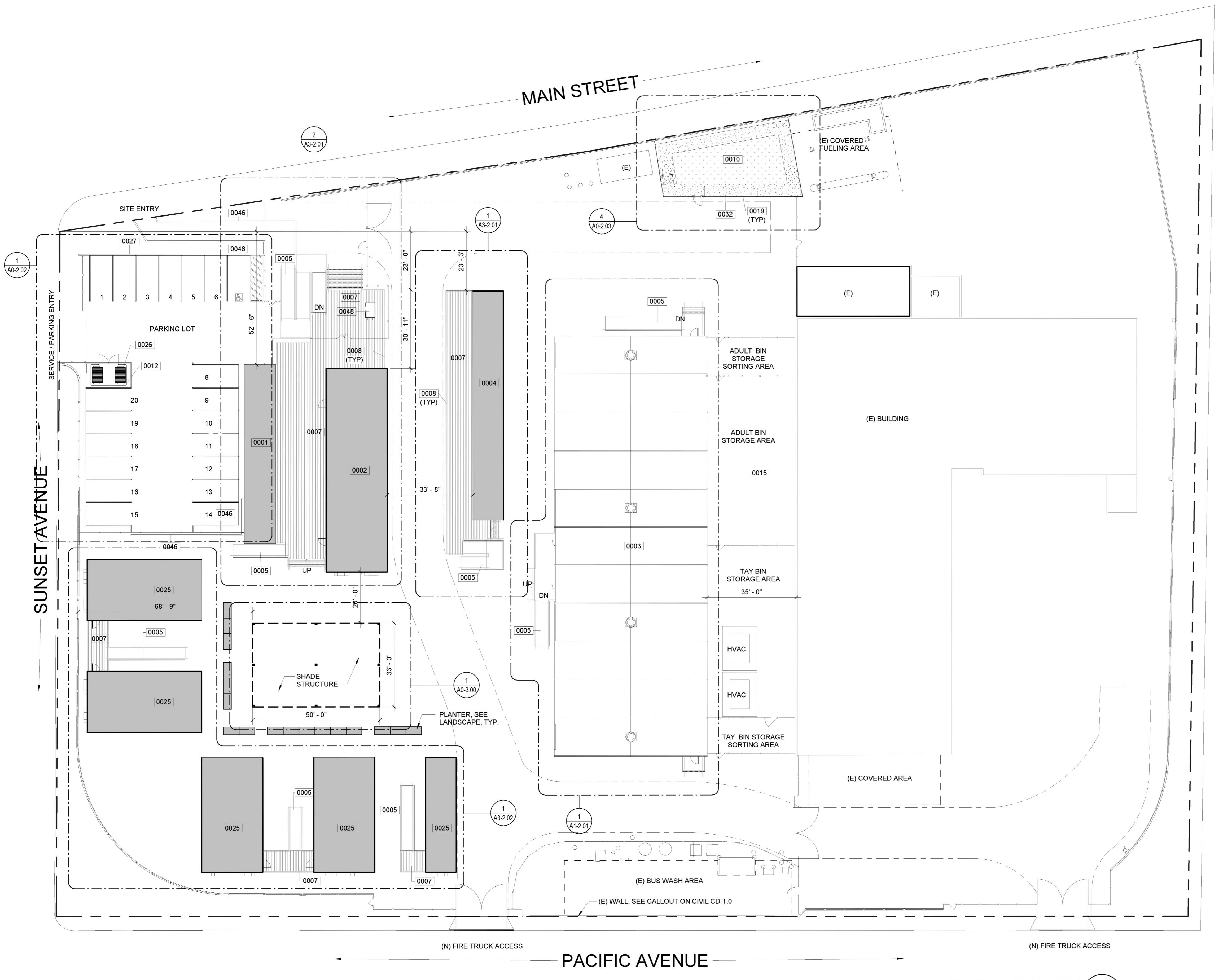
**ATTACHMENTS**

- A. Project Site Plan
- B. Project Feasibility Plan

Attachment A – Project Site Plan

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## ATTACHMENT A - SITE PLAN



GENERAL NOTES - SITE  
 1. SEE CIVIL DRAWINGS FOR LOCATION OF ALL STRUCTURES ON SITE

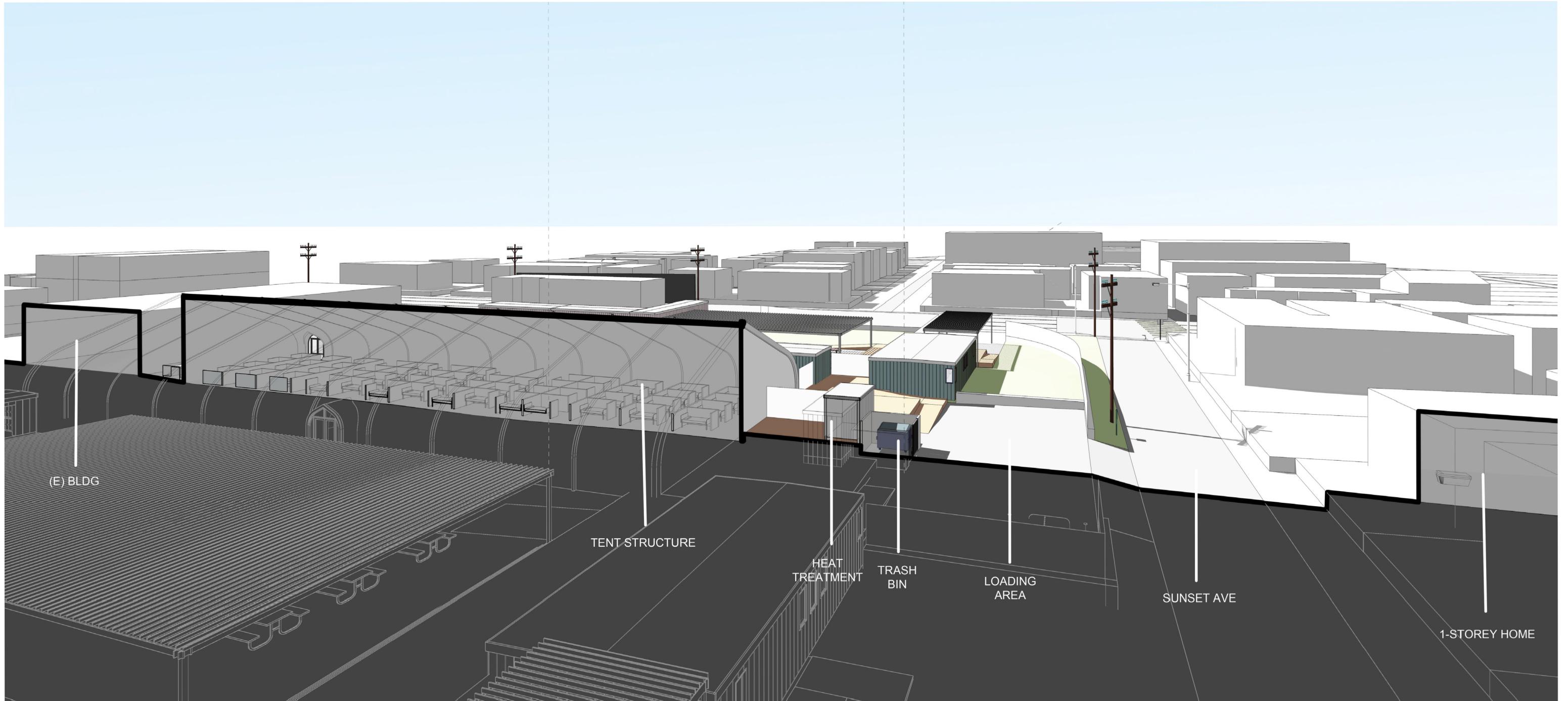
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CITY OF LOS ANGELES		DEPARTMENT OF PUBLIC WORKS	
GARY LEE MOORE, PE, ENV SP		GONZALEZ GOODALE ARCHITECTS	
CITY ENGINEER		CITY ARCHITECT	
DATE: 06-00-18		DATE: 06-00-18	
DESIGNED BY: ...		DRAWN BY: ...	
CHECKED BY: ...		APPROVED BY: ...	
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STATE OF CALIFORNIA			

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## Attachment B – Project Feasibility Plan

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# SITE FEASIBILITY PLAN - SLEEPING QUARTERS PARTITIONS



SECTION A

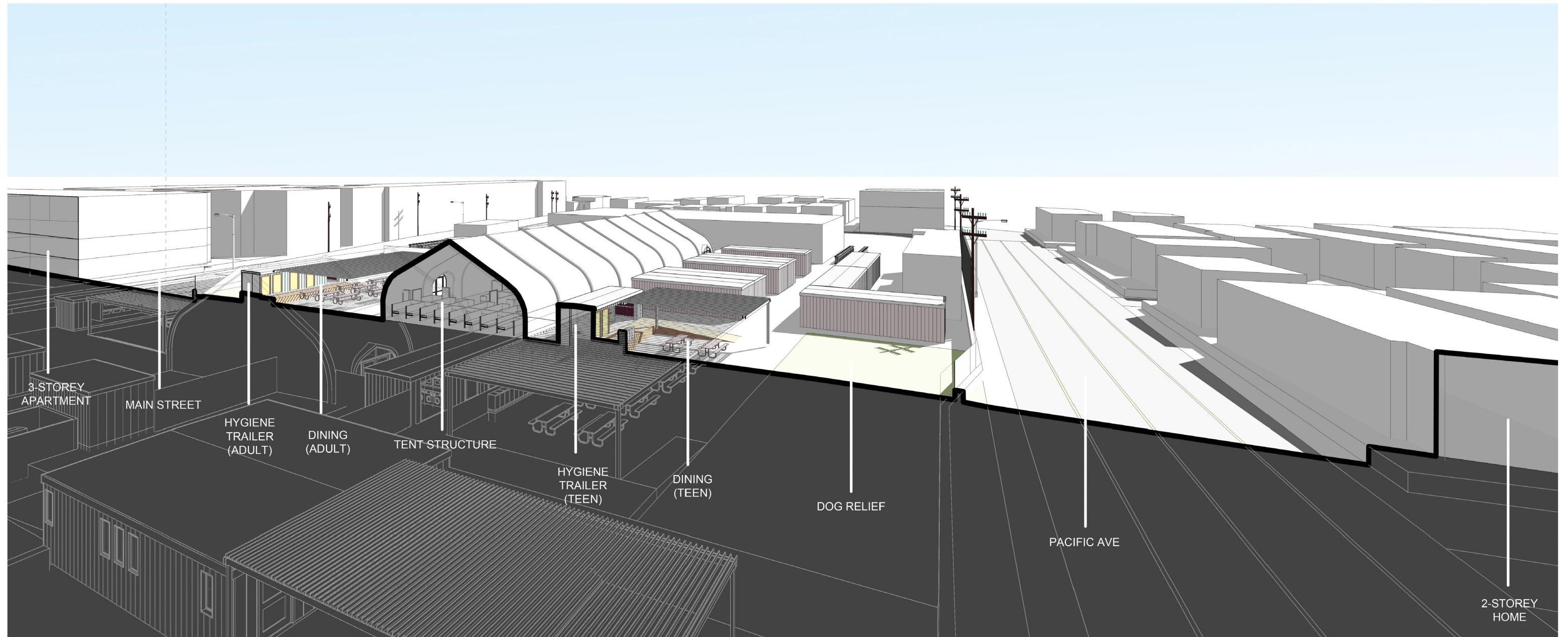


GONZALEZ GOODALE ARCHITECTS

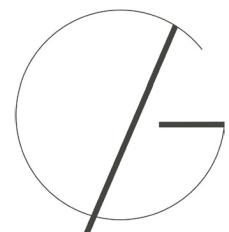
100 SUNSET - BRIDGE TO HOME

CONCEPT STUDIES 09.05.2018

# SITE FEASIBILITY PLAN - SLEEPING QUARTERS PARTITIONS



SECTION B



GONZALEZ GOODALE ARCHITECTS

100 SUNSET - BRIDGE TO HOME

CONCEPT STUDIES 09.05.2018