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# CITY OF LOS ANGELES

CALIFORNIA



**KAREN BASS**  
MAYOR

**DEPARTMENT OF  
PUBLIC WORKS**

**BUREAU OF  
ENGINEERING**

**ALFRED MATA, PE**  
INTERIM CITY ENGINEER

1149 S. BROADWAY, SUITE 700  
LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

April 7, 2026

The Honorable Marqueece Harris-Dawson  
President  
Los Angeles City Council

c/o Patrice Y. Lattimore  
City Clerk  
City Hall Room 360

**COUNCIL FILE NO. 23-1022-S29 – CD 2 PALLET SHELTER/LOW BARRIER NAVIGATION CENTER (LBNC), CD 14 EAGLE ROCK RECREATION CENTER TINY HOME VILLAGE (THV)/LBNC, CD 10 LAFAYETTE PARK BRIDGE HOUSING/LBNC; CD 2 VALLEY PLAZA PARK PALLET SHELTER/LOW BARRIER NAVIGATION CENTER (LBNC) LEASE EXTENSIONS; AND CD 1 INTERIM HOUSING/LBNC SERVICE CONTRACT FUNDING ALLOCATION CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF EXEMPTION (NOE).**

Dear President Harris-Dawson and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the funding allocation, lease, and continued use for an additional period of up to one year for the Pallet Shelter/LBNC at 11471 Chandler Boulevard in Council District 2; the Eagle Rock Recreation Center THV/LBNC at 7570 Figueroa Street in Council District 14; the Lafayette Park Bridge Housing/LBNC at 668 S. Hoover Street in Council District 10; and the Valley Plaza Park Pallet Shelter/LBNC located at 6099 Laurel Canyon Boulevard in Council District 2.

The attached environmental documentation is also being transmitted for City Council's consideration related to the Los Angeles Homeless Services Authority (LAHSA) service contract funding allocation for a period up to 5 years of the Interim Housing/LBNC located at 1933 Magnolia Avenue in Council District 1.

## **RECOMMENDATIONS**

Staff recommends that the Council find that the funding allocation, lease, and continued use for a period of approximately one year for the Pallet Shelters/LBNC located at 11471

April 6, 2026

Page 2 of 3

Chandler Boulevard, the Eagle Rock Recreation Center Tiny Home Village (THV)/LBNC at 7570 N. Figueroa Street, and the LaFayette Park Bridge Housing/low barrier navigation center at 668 S. Hoover Street, and the Valley Plaza Park Pallet Shelter/low barrier navigation center located at 6099 Laurel Canyon Boulevard for those experiencing homelessness; and California Environmental Quality Act (CEQA) exemption determination that, the projects are statutorily exempt under Public Resources Code PRC Section 21080.27.5, applicable to low barrier navigation centers; and Government Code Section 8698.4(a)(4), governing homeless shelter projects under a shelter crisis declaration.

Staff recommends that the Council find that the funding allocation and lease for a period up to five years for Interim Housing/LBNC located at 1933 Magnolia Avenue for those experiencing homelessness, are statutorily exempt from CEQA under PRC Section 21080.27.5, applicable to low barrier navigation centers; and Government Code Section 8698.4(a)(4) governing homeless shelter projects under a shelter crisis declaration.

Please refer to the attached NOEs. If you have any questions, please contact Maria Martin at [Maria.Martin@lacity.org](mailto:Maria.Martin@lacity.org) or (213) 485-5753.

Sincerely,



Alfred Mata, PE  
Interim City Engineer

AM/PS/MM:del;eg

Box\EXE\\_2026 City Engineer\Transmittal BOE Report CF 23-1022-S27

Attachment

cc: Patrick Schmidt, Bureau of Engineering  
Steven Fierce, Bureau of Engineering  
Meghan Aldrich, Bureau of Engineering  
Marina Quinones, Bureau of Engineering  
Maria Martin, Bureau of Engineering

**CITY OF LOS ANGELES**  
DEPARTMENT OF PUBLIC WORKS  
BUREAU OF ENGINEERING  
1149 S. BROADWAY, 7<sup>th</sup> FLOOR  
LOS ANGELES, CALIFORNIA 90015  
CALIFORNIA ENVIRONMENTAL QUALITY ACT  
**NOTICE OF EXEMPTION**  
(Articles II and III - City CEQA Guidelines)



Filing this notice with the County Clerk and State Clearinghouse in the Office of Planning and Research is optional, and it starts a 35-day statute of limitations on court challenges to the City's determination that the Project is not subject to CEQA. (Public Resources Code Section 21152(b), 21167(d).)

<b>LEAD CITY AGENCY AND ADDRESS:</b> City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b> 14
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<b>PROJECT TITLE:</b> CD 14 Eagle Rock Recreation Center THV at 7570 Figueroa Street Lease	<b>LOG REFERENCE</b> C.F. 23-1022-S29
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**PROJECT LOCATION:** 7570 Figueroa Street, Assessor Parcel Numbers (APNs) 5691-017-902 and 5691-017-904, in the Northeast Los Angeles Community Plan Area in the City of Los Angeles Council District 14 (CD 14), see Figure 1 – Project Location and the attached Project Site Plan. T.G. 565 D5

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:** The 7570 Figueroa Street Tiny Home Village /Low Barrier Navigation Center (facility) Lease project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) continued use/operation, for approximately up to five years total use of the approximately 48 bed facility for persons experiencing homelessness. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate consistent with all Project approval requirements imposed by the City Council and the applicable program requirements for bridge shelters, low barrier navigation centers, and/or interim or transitional homeless facilities including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council Clerk File No. 19-0774-S1). On February 5, 2026 the Board of Recreation and Park Commission determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project. On \_\_\_\_\_, the City Council approved the Project and determined it was exempt from CEQA.

<b>CONTACT PERSON</b> Maria Martin (maria.martin@lacity.org)	<b>TELEPHONE NUMBER</b> (213) 485-5753
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<b>EXEMPT STATUS:</b>		
STATE CEQA GUIDELINES	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4

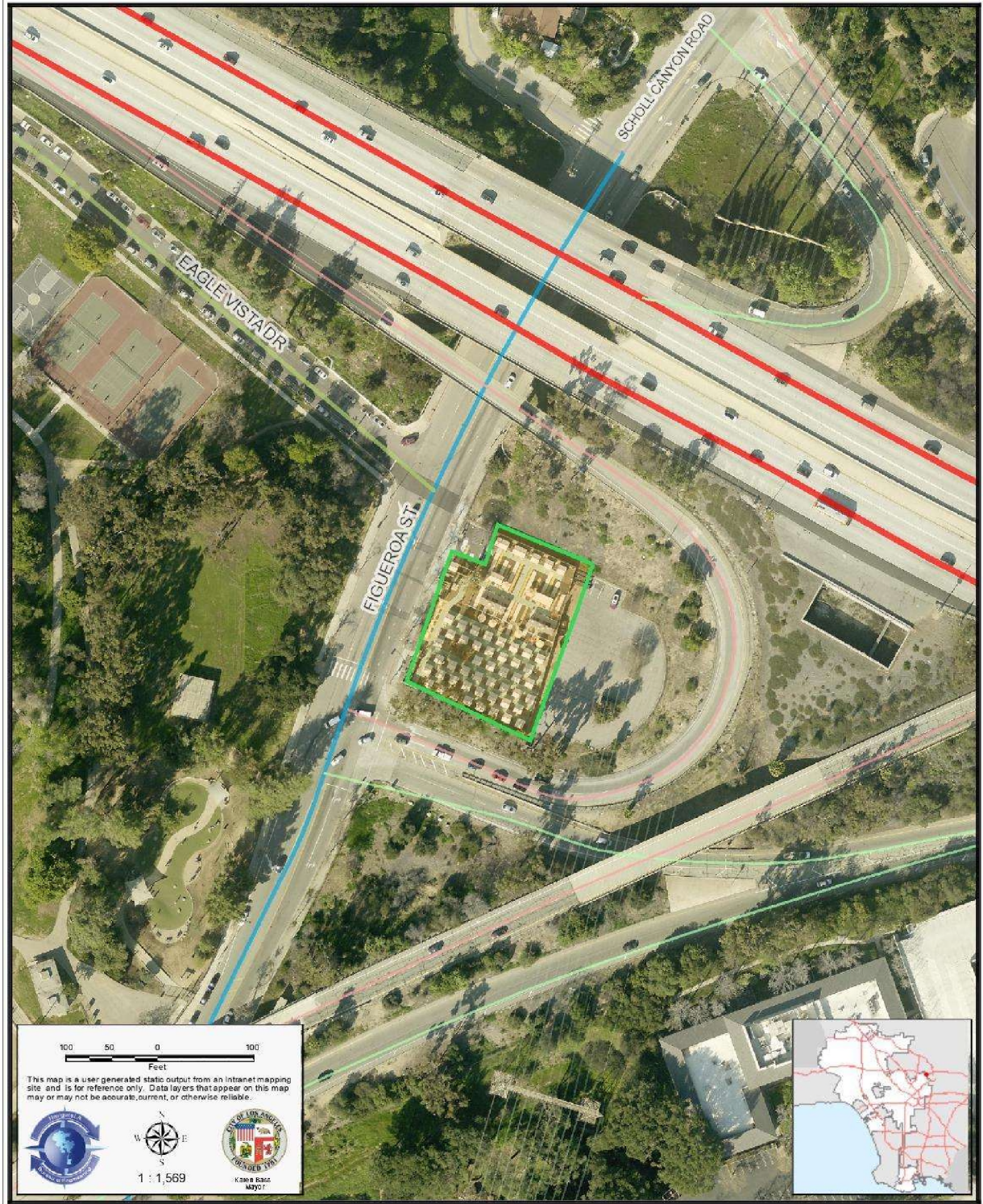
**JUSTIFICATION FOR PROJECT EXEMPTION:** This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and/or Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the NOE supporting documents in Council File (CF) Nos. 20-0841-S52 and 19-0774-S1 and in Board of Recreation and Park (RAP) Commission File No. 21-105. Additional support is provided in the attached narrative.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

<b>SIGNATURE:</b>  Martin	<b>TITLE:</b> Environmental Affairs Officer Environmental Management Division	<b>DATE:</b>
<b>FEE:</b> 75.00 _____	<b>RECEIPT NO.</b>	<b>REC'D BY</b>
		<b>DATE</b>

DISTRIBUTION: (1) County Clerk; (2) Agency Record

**Figure: Project Location**



## CEQA EXEMPTION NARRATIVE

### I. PROJECT DESCRIPTION, CONTINUED

#### A. Operational Governance

The Project concerns a homeless shelter facility serving persons experiencing homelessness in the City. It is operated pursuant to a third-party lease agreement or similar agreement awarded to a third-party service provider solicited by and governed by rules set by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate consistent with all Project approval requirements imposed by the City Council and the applicable program requirements for bridge shelters, low barrier navigation centers, and interim or transitional homeless facilities, including, but not limited to, the following Project requirements as they exist and are updated by LAHSA:

- LAHSA Program Standards (2024), <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- LAHSA Tiny Home Interim Housing Program, Scope of Required Services (2024-2025), <https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf>
- LAHSA Crisis/Bridge Housing for Adult Programs Scope of Required Services (2024), <https://www.lahsa.org/documents?id=7937-scope-required-services-srs-fy-24-25-crisis-bridge-housing-for-adults-programs-srs-and-appendixes-final.pdf>
- LAHSA Facility Standards (2023-2024), <https://www.lahsa.org/documents?id=2767-lahsafacility-standards.pdf>

Additional applicable LAHSA operations documents can be found on LAHSA's website at <https://www.lahsa.org/documents>. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Project operation will include a security plan consistent with the LAHSA's standards. Further, the Project will be operated consistent with the definition of Low Barrier Navigation Center at Government Code section 65660, subpart (a) as detailed below.

#### B. Service-Enriched Operations

The Project will follow LAHSA's operational standards to ensure that it is operated based on housing first principles and is a service-enriched facility. Under Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law), "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery 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." (Welf. & Inst. Code § 8255(d)(1)).

Housing First 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." (*Id.*, § 8255(d)(2)(A).) 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 the tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to divert an individual from entry into the homelessness system successfully, a referral must immediately be made to a CES Diversion/Prevention program. To

identify other permanent housing options, service providers continue to have problem-solving conversations with the individual while the person resides in low barrier navigation centers, crisis and bridge housing. More broadly, the Project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness 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. LAHSA's Coordinated Entry System (CES) will be used to enter participants and facilitate service providers conducting assessments and providing services to connect people to resources and permanent housing. (LAHSA CES Brochure (2018), <https://www.lahsa.org/documents?id=1938-2018-coordinated-entry-system-ces-brochure.pdf>; see also <https://www.lahsa.org/ces/>.) The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are provided on a voluntary basis, and participants are not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers, and housing is not provided contingent upon participation in services, and thus the Project is operated based on housing first principles.

According to LAHSA's project requirements, service providers that oversee this facility must provide case management services and develop a Housing Stability Plan with each person. The shelter will program and implement 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 individual 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 individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing with a ninety (90) day goal. For as long as Los Angeles Municipal Code section 12.80 imposes a six-month residential durational limit, residents will not be permitted to reside at the Project facility for more than six months and if a resident has not been placed outside the Project facility within that time, the resident will be relocated to a different housing option.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills, and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits.

By creating a stable environment and providing access to basic needs, clients can maintain a

consistent connection to outreach workers and case managers to create a path to interim or permanent housing.

**II. The Project is exempt pursuant to Public Resources Code § 21080.27.5 as a Low Barrier Navigation Center**

Government Code section 65660, subpart (a) defines Low Barrier Navigation Centers (“LBNC”), as follows:

[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. A Low Barrier Navigation Center may be non-congregate and relocatable. “Low Barrier” means best practices to reduce barriers to entry, and may include, but is not limited to, the following: (1) The presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth; (2) Pets; (3) The storage of possessions; (4) Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.

Public Resources Code Section 21080.27.5 exempts from CEQA the following actions involving an LBNC:

1. A lease, or facilitating a lease, of land owned by the City for an LBNC.
2. An action associated with a lease for an LBNC.
3. Providing financial assistance to an LBNC.
4. Constructing and/or operating an LBNC.
5. Entering into a contract to provide services to an LBNC.

Following LAHSA’s operational standards, as detailed above in the Project Description, ensures that the Project operates as a LBNC, because the facility will follow housing first principles and operate as 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.

Further, the Project is a LBNC, because the Project is a low-barrier shelter based on implementing best practices to reduce barriers to entry, including, but not limited to, as follows:

Presence of partners. The presence of partners is allowed at the THV/low barrier navigation center.

Pets. Participants are allowed in the THV cabins.

Storage of possessions. The storage of possessions is provided in the cabins.

Privacy. Privacy to participants is provided through individual sleeping spaces in dual occupancy cabins that are separate with communal bathrooms.

Based on its years of experience providing shelters similar to this one and the requirements applicable to this Project, the City has determined that the above-noted operational actions for this project will ensure that the shelter is operated consistently with best practices for lowering

barriers to entry for people experiencing homelessness and that it is operated as a housing-first, service-enriched shelter.

The Project, therefore, is exempt from the requirements of CEQA pursuant to Public Resources Code Section 21080.27.5 because this Project is a lease, or lease extension, of land owned by the City for an LBNC; is an action providing financial assistance to an LBNC and operating an LBNC, and approves entry into a contract to provide services to an LBNC. as described above in the Project Description.

### **III. The Project is exempt pursuant to Government Code § 8698.4(a)(4)**

Upon the City's declaration of shelter crisis pursuant to Government Code Section 8698.4, subdivision (a)(2) of Section 8698.4 provides for streamlined approval of homeless shelters by the City. Subdivision (a)(1) of Section 8698.4 states that "[e]mergency housing may include homeless shelters for the homeless located or constructed on any land owned or leased by a city, county, or city and county, including land acquired with low- and moderate-income housing funds." Subdivision (a)(2)(B) further provides that "[t]his section applies only to a public facility or homeless shelters reserved entirely for the homeless pursuant to this chapter." (Gov. Code, § 8698.4, subd. (a)(2)(B).)

Under Government Code Section 8698.4, subdivision (c)(1),

"Homeless shelter" means a facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless that is not in existence after the declared shelter crisis. A temporary homeless shelter community may include supportive and self-sufficiency development services. A "homeless shelter" shall include a parking lot owned or leased by a city, county, or city and county specifically identified as one allowed for safe parking by homeless and unstably housed individuals.

As detailed above in the Project Description, the Project will operate as a "homeless shelter," by complying with LAHSA's operational standards for homeless shelters, all Project approval requirements, and by providing overnight sleeping accommodations, with the primary purpose of providing temporary shelter for the homeless that is not in existence after the declared shelter crisis as stated above in the Project Description and according to all Project Approval records. Additionally, Los Angeles Municipal Code section 12.80 reflects the City's intent to utilize Section 8698.4 and the Project is consistent with that section based on the Project Description stated above.

Subdivision (a)(4) of Section 8698.4 exempts from CEQA the following actions taken by the City:

- (A) To lease, convey, or encumber land owned by a city, county, or city and county, or to facilitate the lease, conveyance, or encumbrance of land owned by the local government for a homeless shelter constructed pursuant to, or authorized by, this section.
- (B) To provide financial assistance to a homeless shelter constructed pursuant to, or authorized by, this section.

- (C) To approve a contract to provide services for people experiencing homelessness to a homeless shelter constructed pursuant to, or authorized by, this section. These services may include, but are not limited to, case management, resource navigation, security services, residential services, and counseling services.

The City Council declared a shelter crisis pursuant to Government Code Section 8698.4 on April 17, 2018, and the declaration remains in effect (City Council File Nos. 15-1138-S30, 15-1138-S33, and 15-1138-S40). Further, the City adopted local standards and procedures for the design, site development, and operation of homeless shelters and the structures and facilities as required by Government Code section 8698.4 found at Los Angeles Municipal Code section 91.8605 and which were approved by the State as shown in the March 29, 2019 and November 17, 2019, Official Actions of the Los Angeles City Council, Council File No. 15-1138-S40.

The Project will be a public facility or homeless shelter reserved entirely for the homeless pursuant to the Shelter Crisis law at Chapter 7.8, of Division 1, of Title 2 of the Government Code.

The Project is located on city-owned land controlled by the Department of Recreation and Parks (RAP) located at 7570 Figueroa Street (Los Angeles County Assessor's Parcel Nos. 5691-017-803,902,904) and serves as a temporary homeless shelter. The shelter was approved by the Board of Recreation and Park Commissioner on June 17, 2021 (Board Report No 21-105) and a ROE permit for the operation of the shelter was executed between RAP and GSD.

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). The project involves the lease or a lease extension, of land owned by a city, (a) extended, or new lease, of the RAP-controlled site from approximately up to one year, (b) funding, and (c) continued use/operation, for approximately up to five years total use of the approximately 48-bed Tiny Home Village/ Low Barrier Navigation Center facility for persons experiencing homelessness.

**CITY OF LOS ANGELES**  
DEPARTMENT OF PUBLIC WORKS  
BUREAU OF ENGINEERING  
1149 S. BROADWAY, 7<sup>th</sup> FLOOR  
LOS ANGELES, CALIFORNIA 90015  
CALIFORNIA ENVIRONMENTAL QUALITY ACT  
**NOTICE OF EXEMPTION**  
(Articles II and III - City CEQA Guidelines)



Filing this notice with the County Clerk and State Clearinghouse in the Office of Planning and Research is optional, and it starts a 35-day statute of limitations on court challenges to the City's determination that the Project is not subject to CEQA. (Public Resources Code Section 21152(b), 21167(d).)

<b>LEAD CITY AGENCY AND ADDRESS:</b> City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b> 2
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<b>PROJECT TITLE:</b> CD 2 THV at 11471 Chandler Blvd. Lease	<b>LOG REFERENCE</b> C.F. 23-1022-S29
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**PROJECT LOCATION:** 11471 Chandler Boulevard (LA County Assessor's Parcel No. 2350-011-900), in the North Hollywood Recreation Center (11466 Chandler Boulevard), in the North Hollywood - Valley Village Community Plan Area, City of Los Angeles (City), Los Angeles Co. Figure 1: Project Location. T.G. 562-J2

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:** The 11471 Chandler Boulevard Tiny Home Village (THV)/ Low Barrier Navigation Center (facility) Lease project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) continued use/operation, for approximately up to six years total use of the approximately 75 bed facility for persons experiencing homelessness. The facility is operated pursuant to a third-party lease or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority). The facility will operate consistently with all Project approval requirements imposed by the City Council and applicable program requirements for bridge shelters, low barrier navigation centers, and/or interim or transitional homeless facilities including, but not limited to, the Project requirements stated in the attached narrative and project approval documents contained in City Council Clerk File No. 20-0841. On February 5, 2026 the Board of Recreation and Park Commission determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project. On \_\_\_\_\_, the City Council approved the Project and determined it was exempt from CEQA.

<b>CONTACT PERSON</b> Maria Martin (maria.martin@lacity.org)	<b>TELEPHONE NUMBER</b> (213) 485-5753
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<b>EXEMPT STATUS:</b> STATE CEQA GUIDELINES	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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**JUSTIFICATION FOR PROJECT EXEMPTION:** This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; PRC Section 21080.10(c) as a contract approval providing homelessness services; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the notice of exemption supporting documents in Council File Nos. 20-0841, 21-105, and 25-016. Additional support is provided in the attached narrative.

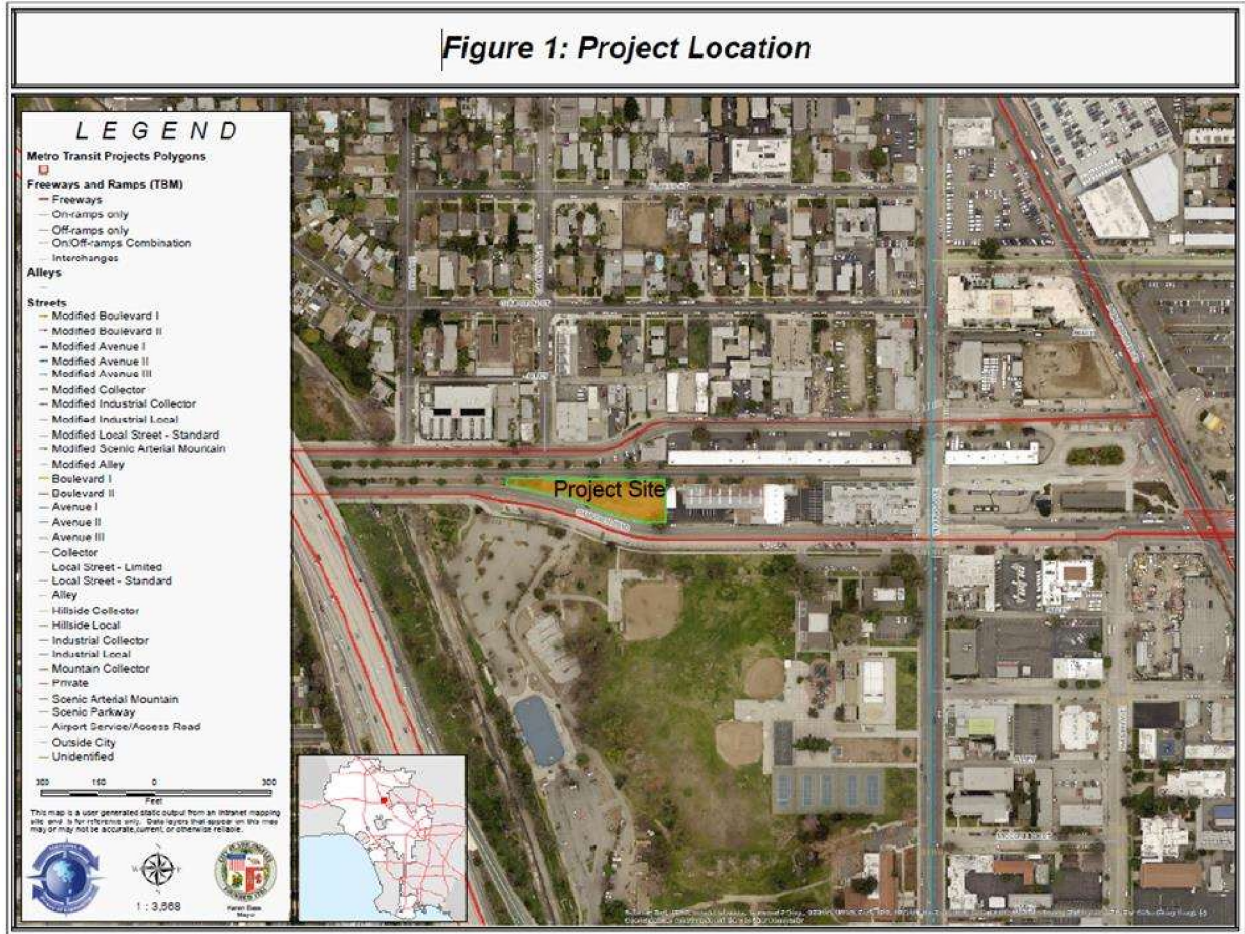
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

<b>SIGNATURE:</b>  Martin	<b>TITLE:</b> Environmental Affairs Officer Environmental Management Division	<b>DATE:</b>
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<b>FEE:</b> 75.00 _____	<b>RECEIPT NO.</b>	<b>REC'D BY</b>	<b>DATE</b>
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DISTRIBUTION: (1) County Clerk; (2) Agency Record

Figure 1: Project Location



## CEQA EXEMPTION NARRATIVE

### I. PROJECT DESCRIPTION, CONTINUED

#### A. Operational Governance

The Project concerns a homeless shelter facility serving persons experiencing homelessness in the City. It is operated pursuant to a third-party lease agreement or similar agreement awarded to a third-party service provider solicited by and governed by rules set by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate consistent with all Project approval requirements imposed by the City Council and the applicable program requirements for bridge shelters, low barrier navigation centers, and interim or transitional homeless facilities, including, but not limited to, the following Project requirements as they exist and are updated by LAHSA:

- LAHSA Program Standards (2024), <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- LAHSA Tiny Home Interim Housing Program, Scope of Required Services (2024-2025), <https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf>
- LAHSA Crisis/Bridge Housing for Adult Programs Scope of Required Services (2024), <https://www.lahsa.org/documents?id=7937-scope-required-services-srs-fy-24-25-crisis-bridge-housing-for-adults-programs-srs-and-appendixes-final.pdf>
- LAHSA Facility Standards (2023-2024), <https://www.lahsa.org/documents?id=2767-lahsafacility-standards.pdf>

Additional applicable LAHSA operations documents can be found on LAHSA's website at <https://www.lahsa.org/documents>. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Project operation will include a security plan consistent with the LAHSA's standards. Further, the Project will be operated consistent with the definition of Low Barrier Navigation Center at Government Code section 65660, subpart (a) as detailed below.

#### B. Service-Enriched Operations

The Project will follow LAHSA's operational standards to ensure that it is operated based on housing first principles and is a service-enriched facility. Under Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law), "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery 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." (Welf. & Inst. Code § 8255(d)(1)).

Housing First 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." (*Id.*, § 8255(d)(2)(A).) 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 the tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to divert an individual from entry into the homelessness system successfully, a referral must immediately be made to a CES Diversion/Prevention program. To

identify other permanent housing options, service providers continue to have problem-solving conversations with the individual while the person resides in low barrier navigation centers, crisis and bridge housing. More broadly, the Project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness 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. LAHSA's Coordinated Entry System (CES) will be used to enter participants and facilitate service providers conducting assessments and providing services to connect people to resources and permanent housing. (LAHSA CES Brochure (2018), <https://www.lahsa.org/documents?id=1938-2018-coordinated-entry-system-ces-brochure.pdf>; see also <https://www.lahsa.org/ces/>.) The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are provided on a voluntary basis, and participants are not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers, and housing is not provided contingent upon participation in services, and thus the Project is operated based on housing first principles.

According to LAHSA's project requirements, service providers that oversee this facility must provide case management services and develop a Housing Stability Plan with each person. The shelter will program and implement 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 individual 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 individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing with a ninety (90) day goal. For as long as Los Angeles Municipal Code section 12.80 imposes a six-month residential durational limit, residents will not be permitted to reside at the Project facility for more than six months and if a resident has not been placed outside the Project facility within that time, the resident will be relocated to a different housing option.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills, and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits.

By creating a stable environment and providing access to basic needs, clients can maintain a

consistent connection to outreach workers and case managers to create a path to interim or permanent housing.

**II. The Project is exempt pursuant to Public Resources Code § 21080.27.5 as a Low Barrier Navigation Center**

Government Code section 65660, subpart (a) defines Low Barrier Navigation Centers (“LBNC”), as follows:

[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. A Low Barrier Navigation Center may be non-congregate and relocatable. “Low Barrier” means best practices to reduce barriers to entry, and may include, but is not limited to, the following: (1) The presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth; (2) Pets; (3) The storage of possessions; (4) Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.

Public Resources Code Section 21080.27.5 exempts from CEQA the following actions involving an LBNC:

1. A lease, or facilitating a lease, of land owned by the City for an LBNC.
2. An action associated with a lease for an LBNC.
3. Providing financial assistance to an LBNC.
4. Constructing and/or operating an LBNC.
5. Entering into a contract to provide services to an LBNC.

Following LAHSA’s operational standards, as detailed above in the Project Description, ensures that the Project operates as a LBNC, because the facility will follow housing first principles and operate as 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.

Further, the Project is a LBNC, because the Project is a low-barrier shelter based on implementing best practices to reduce barriers to entry, including, but not limited to, as follows:

Presence of partners. The presence of partners is allowed at the THV/low barrier navigation center.

Pets. Participants are allowed in the THV cabins.

Storage of possessions. The storage of possessions is provided in the cabins.

Privacy. Privacy to participants is provided through individual sleeping spaces in dual occupancy cabins that are separate with communal bathrooms.

Based on its years of experience providing shelters similar to this one and the requirements applicable to this Project, the City has determined that the above-noted operational actions for this project will ensure that the shelter is operated consistently with best practices for lowering

barriers to entry for people experiencing homelessness and that it is operated as a housing-first, service-enriched shelter.

The Project, therefore, is exempt from the requirements of CEQA pursuant to Public Resources Code Section 21080.27.5 because this Project is a lease, or lease extension, of land owned by the City for an LBNC; is an action providing financial assistance to an LBNC and operating an LBNC, and approves entry into a contract to provide services to an LBNC. as described above in the Project Description.

### **III. The Project is exempt pursuant to Government Code § 8698.4(a)(4)**

Upon the City's declaration of shelter crisis pursuant to Government Code Section 8698.4, subdivision (a)(2) of Section 8698.4 provides for streamlined approval of homeless shelters by the City. Subdivision (a)(1) of Section 8698.4 states that "[e]mergency housing may include homeless shelters for the homeless located or constructed on any land owned or leased by a city, county, or city and county, including land acquired with low- and moderate-income housing funds." Subdivision (a)(2)(B) further provides that "[t]his section applies only to a public facility or homeless shelters reserved entirely for the homeless pursuant to this chapter." (Gov. Code, § 8698.4, subd. (a)(2)(B).)

Under Government Code Section 8698.4, subdivision (c)(1),

"Homeless shelter" means a facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless that is not in existence after the declared shelter crisis. A temporary homeless shelter community may include supportive and self-sufficiency development services. A "homeless shelter" shall include a parking lot owned or leased by a city, county, or city and county specifically identified as one allowed for safe parking by homeless and unstably housed individuals.

As detailed above in the Project Description, the Project will operate as a "homeless shelter," by complying with LAHSA's operational standards for homeless shelters, all Project approval requirements, and by providing overnight sleeping accommodations, with the primary purpose of providing temporary shelter for the homeless that is not in existence after the declared shelter crisis as stated above in the Project Description and according to all Project Approval records. Additionally, Los Angeles Municipal Code section 12.80 reflects the City's intent to utilize Section 8698.4 and the Project is consistent with that section based on the Project Description stated above.

Subdivision (a)(4) of Section 8698.4 exempts from CEQA the following actions taken by the City:

- (A) To lease, convey, or encumber land owned by a city, county, or city and county, or to facilitate the lease, conveyance, or encumbrance of land owned by the local government for a homeless shelter constructed pursuant to, or authorized by, this section.
- (B) To provide financial assistance to a homeless shelter constructed pursuant to, or authorized by, this section.

- (C) To approve a contract to provide services for people experiencing homelessness to a homeless shelter constructed pursuant to, or authorized by, this section. These services may include, but are not limited to, case management, resource navigation, security services, residential services, and counseling services.

The City Council declared a shelter crisis pursuant to Government Code Section 8698.4 on April 17, 2018, and the declaration remains in effect (City Council File Nos. 15-1138-S30, 15-1138-S33, and 15-1138-S40). Further, the City adopted local standards and procedures for the design, site development, and operation of homeless shelters and the structures and facilities as required by Government Code section 8698.4 found at Los Angeles Municipal Code section 91.8605 and which were approved by the State as shown in the March 29, 2019 and November 17, 2019, Official Actions of the Los Angeles City Council, Council File No. 15-1138-S40.

The Project will be a public facility or homeless shelter reserved entirely for the homeless pursuant to the Shelter Crisis law at Chapter 7.8, of Division 1, of Title 2 of the Government Code.

The Project is located on land owned by the City of Los Angeles Department of Recreation and Parks' Eagle Rock Recreation Center located at 11471 Chandler Blvd and serves as a temporary homeless shelter. The shelter was approved by the Board of Recreation and Park Commissioner on August 6, 2020 (Board Report No 20-160) and a ROE permit for the operation of the shelter was executed between RAP and GSD.

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). The project involves the lease or a lease extension, of land owned by a city, (a) extended, or new lease, of the RAP-controlled site for approximately up to one year; (b) funding, and (c) continued use/operation, for approximately up to six years total use of the approximately 75-bed Bridge Home/Low Barrier Navigation Center facility for persons experiencing homelessness.

**CITY OF LOS ANGELES**  
DEPARTMENT OF PUBLIC WORKS  
BUREAU OF ENGINEERING  
1149 S. BROADWAY, 7<sup>th</sup> FLOOR  
LOS ANGELES, CALIFORNIA 90015  
CALIFORNIA ENVIRONMENTAL QUALITY ACT  
**NOTICE OF EXEMPTION**  
(Articles II and III - City CEQA Guidelines)



Filing this notice with the County Clerk and State Clearinghouse in the Office of Planning and Research is optional, and it starts a 35-day statute of limitations on court challenges to the City's determination that the Project is not subject to CEQA. (Public Resources Code Section 21152(b), 21167(d).)

<b>LEAD CITY AGENCY AND ADDRESS:</b> City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b> 10
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<b>PROJECT TITLE:</b> 668 S. Hoover St. Bridge Home/Low Barrier Navigation Center Lease	<b>LOG REFERENCE</b> C.F. 23-1022-S29
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**PROJECT LOCATION:** 668 Hoover Street, formerly 625 La Fayette Pl., in the Wilshire Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 634-B2 and 634-B3.

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:** The 668 Hoover Street Bridge Home/Low Barrier Navigation Center (Facility) Lease project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) continued use/operation, for approximately up to six years total use of the approximately 75-bed Bridge Home/Low Barrier Navigation Center facility for persons experiencing homelessness. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate consistent with all Project approval requirements imposed by the City Council and the applicable program requirements for bridge shelters, low barrier navigation centers, and/or interim or transitional homeless facilities including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council Clerk File No. 20-0841. On February 5, 2026 the Board of Recreation and Park Commission determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project. On \_\_\_\_\_, the City Council approved the Project and determined it was exempt from CEQA.

<b>CONTACT PERSON</b> Maria Martin (maria.martin@lacity.org)	<b>TELEPHONE NUMBER</b> (213) 485-5753
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<b>EXEMPT STATUS:</b> STATE CEQA GUIDELINES	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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**JUSTIFICATION FOR PROJECT EXEMPTION:** This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the notice of exemption supporting documents in Council File No. 20-0841. Additional support is provided in the attached narrative.

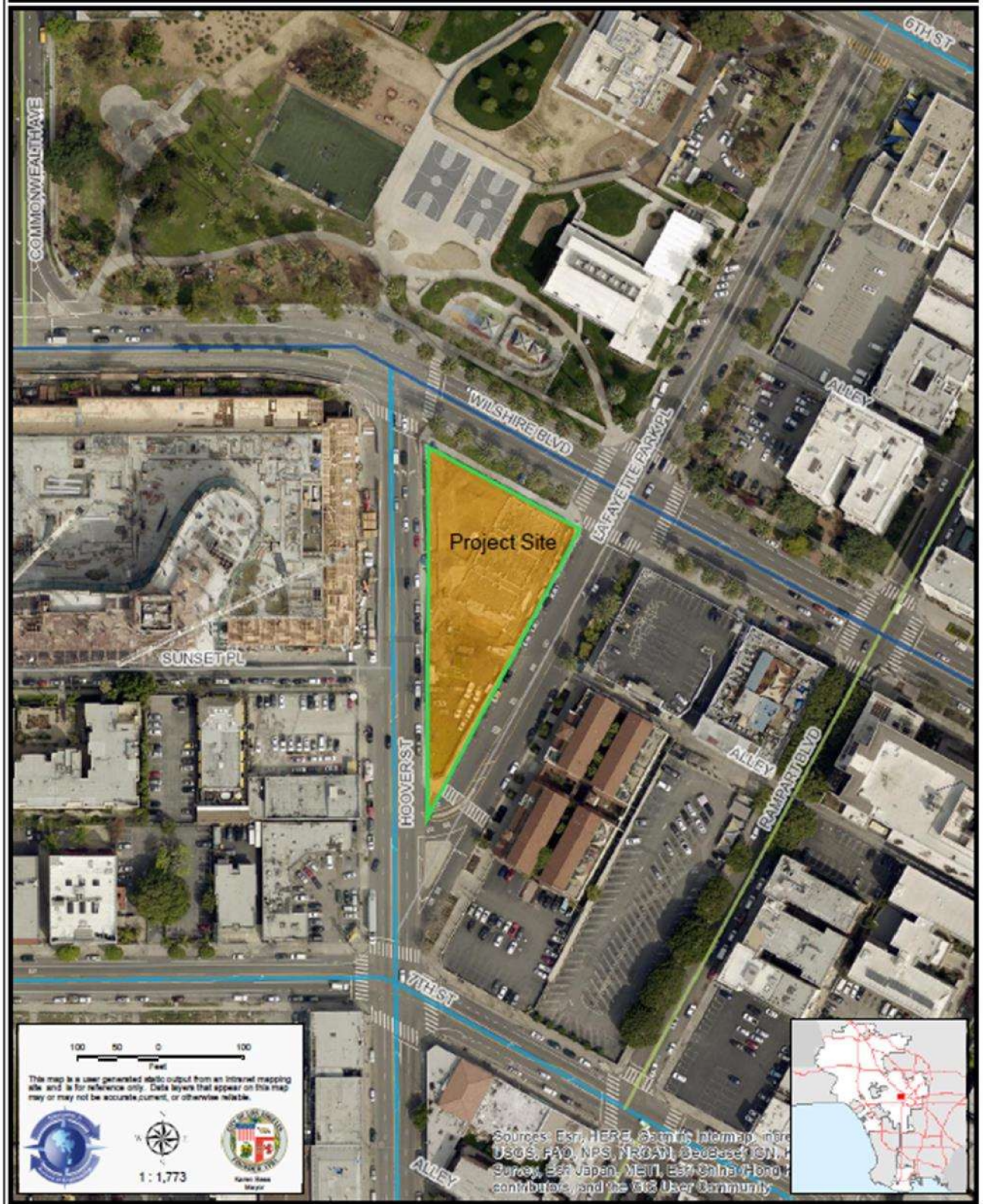
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

<b>SIGNATURE:</b>  Martin	<b>TITLE:</b> Environmental Affairs Officer Environmental Management Division	<b>DATE:</b>
Maria		

<b>FEE:</b> 75.00 _____	<b>RECEIPT NO.</b>	<b>REC'D BY</b>	<b>DATE</b>
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DISTRIBUTION: (1) County Clerk; (2) Agency Record

**Figure 1: Project Location**



## CEQA EXEMPTION NARRATIVE

### I. PROJECT DESCRIPTION, CONTINUED

#### A. Operational Governance

The Project concerns a homeless shelter facility serving persons experiencing homelessness in the City. It is operated pursuant to a third-party lease agreement or similar agreement awarded to a third-party service provider solicited by and governed by rules set by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate consistent with all Project approval requirements imposed by the City Council and the applicable program requirements for bridge shelters, low barrier navigation centers, and interim or transitional homeless facilities, including, but not limited to, the following Project requirements as they exist and are updated by LAHSA:

- LAHSA Program Standards (2024), <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- LAHSA Tiny Home Interim Housing Program, Scope of Required Services (2024-2025), <https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf>
- LAHSA Crisis/Bridge Housing for Adult Programs Scope of Required Services (2024), <https://www.lahsa.org/documents?id=7937-scope-required-services-srs-fy-24-25-crisis-bridge-housing-for-adults-programs-srs-and-appendixes-final.pdf>
- LAHSA Facility Standards (2023-2024), <https://www.lahsa.org/documents?id=2767-lahsafacility-standards.pdf>

Additional applicable LAHSA operations documents can be found on LAHSA's website at <https://www.lahsa.org/documents>. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Project operation will include a security plan consistent with the LAHSA's standards. Further, the Project will be operated consistent with the definition of Low Barrier Navigation Center at Government Code section 65660, subpart (a) as detailed below.

#### B. Service-Enriched Operations

The Project will follow LAHSA's operational standards to ensure that it is operated based on housing first principles and is a service-enriched facility. Under Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law), "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery 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." (Welf. & Inst. Code § 8255(d)(1)).

Housing First 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." (*Id.*, § 8255(d)(2)(A).) 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 the tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to divert an individual from entry into the homelessness system successfully, a referral must immediately be made to a CES Diversion/Prevention program. To

identify other permanent housing options, service providers continue to have problem-solving conversations with the individual while the person resides in low barrier navigation centers, crisis and bridge housing. More broadly, the Project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness 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. LAHSA's Coordinated Entry System (CES) will be used to enter participants and facilitate service providers conducting assessments and providing services to connect people to resources and permanent housing. (LAHSA CES Brochure (2018), <https://www.lahsa.org/documents?id=1938-2018-coordinated-entry-system-ces-brochure.pdf>; see also <https://www.lahsa.org/ces/>.) The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are provided on a voluntary basis, and participants are not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers, and housing is not provided contingent upon participation in services, and thus the Project is operated based on housing first principles.

According to LAHSA's project requirements, service providers that oversee this facility must provide case management services and develop a Housing Stability Plan with each person. The shelter will program and implement 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 individual 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 individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing with a ninety (90) day goal. For as long as Los Angeles Municipal Code section 12.80 imposes a six-month residential durational limit, residents will not be permitted to reside at the Project facility for more than six months and if a resident has not been placed outside the Project facility within that time, the resident will be relocated to a different housing option.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills, and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits.

By creating a stable environment and providing access to basic needs, clients can maintain a

consistent connection to outreach workers and case managers to create a path to interim or permanent housing.

**II. The Project is exempt pursuant to Public Resources Code § 21080.27.5 as a Low Barrier Navigation Center**

Government Code section 65660, subpart (a) defines Low Barrier Navigation Centers ("LBNC"), as follows:

[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. A Low Barrier Navigation Center may be non-congregate and relocatable. "Low Barrier" means best practices to reduce barriers to entry, and may include, but is not limited to, the following: (1) The presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth; (2) Pets; (3) The storage of possessions; (4) Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.

Public Resources Code Section 21080.27.5 exempts from CEQA the following actions involving an LBNC:

1. A lease, or facilitating a lease, of land owned by the City for an LBNC.
2. An action associated with a lease for an LBNC.
3. Providing financial assistance to an LBNC.
4. Constructing and/or operating an LBNC.
5. Entering into a contract to provide services to an LBNC.

Following LAHSA's operational standards, as detailed above in the Project Description, ensures that the Project operates as a LBNC, because the facility will follow housing first principles and operate as 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.

Further, the Project is a LBNC, because the Project is a low-barrier shelter based on implementing best practices to reduce barriers to entry, including, but not limited to, as follows:

**Presence of partners.** This facility was constructed using several prefabricated shipping containers, each of the containers designated for sleeping provide individual sleeping areas with beds for individuals experiencing homelessness. Such separate spaces as well as facility operations allow for the presence of partners.

**Pets.** Participants are allowed to bring their pets to the facility, which includes a pet relief area.

**Storage of possessions.** Storage areas are available for personal possessions in the individual sleeping areas and other storage places are available in the facility as well.

**Privacy.** Participants have privacy provided in the individual sleeping areas designed within the sleeping containers.

Based on its years of experience providing shelters similar to this one and the requirements applicable to this Project, the City has determined that the above-noted operational actions for this project will ensure that the shelter is operated consistently with best practices for lowering barriers to entry for people experiencing homelessness and that it is operated as a housing-first, service-enriched shelter.

The Project, therefore, is exempt from the requirements of CEQA pursuant to Public Resources Code Section 21080.27.5 because this Project is a lease, or lease extension, of land owned by the City for an LBNC; is an action providing financial assistance to an LBNC and operating an LBNC, and approves entry into a contract to provide services to an LBNC. as described above in the Project Description.

### **III. The Project is exempt pursuant to Government Code § 8698.4(a)(4)**

Upon the City's declaration of shelter crisis pursuant to Government Code Section 8698.4, subdivision (a)(2) of Section 8698.4 provides for streamlined approval of homeless shelters by the City. Subdivision (a)(1) of Section 8698.4 states that "[e]mergency housing may include homeless shelters for the homeless located or constructed on any land owned or leased by a city, county, or city and county, including land acquired with low- and moderate-income housing funds." Subdivision (a)(2)(B) further provides that "[t]his section applies only to a public facility or homeless shelters reserved entirely for the homeless pursuant to this chapter." (Gov. Code, § 8698.4, subd. (a)(2)(B).)

Under Government Code Section 8698.4, subdivision (c)(1),

"Homeless shelter" means a facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless that is not in existence after the declared shelter crisis. A temporary homeless shelter community may include supportive and self-sufficiency development services. A "homeless shelter" shall include a parking lot owned or leased by a city, county, or city and county specifically identified as one allowed for safe parking by homeless and unstably housed individuals.

As detailed above in the Project Description, the Project will operate as a "homeless shelter," by complying with LAHSA's operational standards for homeless shelters, all Project approval requirements, and by providing overnight sleeping accommodations, with the primary purpose of providing temporary shelter for the homeless that is not in existence after the declared shelter crisis as stated above in the Project Description and according to all Project Approval records. Additionally, Los Angeles Municipal Code section 12.80 reflects the City's intent to utilize Section 8698.4 and the Project is consistent with that section based on the Project Description stated above.

Subdivision (a)(4) of Section 8698.4 exempts from CEQA the following actions taken by the City:

- (A) To lease, convey, or encumber land owned by a city, county, or city and county, or to facilitate the lease, conveyance, or encumbrance of land owned by the local government for a homeless shelter constructed pursuant to, or authorized by, this section.

- (B) To provide financial assistance to a homeless shelter constructed pursuant to, or authorized by, this section.
- (C) To approve a contract to provide services for people experiencing homelessness to a homeless shelter constructed pursuant to, or authorized by, this section. These services may include, but are not limited to, case management, resource navigation, security services, residential services, and counseling services.

The City Council declared a shelter crisis pursuant to Government Code Section 8698.4 on April 17, 2018, and the declaration remains in effect (City Council File Nos. 15-1138-S30, 15-1138-S33, and 15-1138-S40). Further, the City adopted local standards and procedures for the design, site development, and operation of homeless shelters and the structures and facilities as required by Government Code section 8698.4 found at Los Angeles Municipal Code section 91.8605 and which were approved by the State as shown in the March 29, 2019 and November 17, 2019, Official Actions of the Los Angeles City Council, Council File No. 15-1138-S40.

The Project will be a public facility or homeless shelter reserved entirely for the homeless pursuant to the Shelter Crisis law at Chapter 7.8, of Division 1, of Title 2 of the Government Code.

The Project site is located on city-owned land controlled by the Department of Recreation and Parks (RAP) located at 668 S. Hoover St (Los Angeles County Assessor's Parcel No. 5077-006-901) and serves as a temporary homeless shelter. The shelter was approved by the Board of Recreation and Park Commissioner on March 20, 2019 (Board Report (No 19-062) and a ROE permit for the operation of the shelter was executed between RAP and GSD.

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). The project involves the lease or a lease extension, of land owned by a city, (a) extended, or new lease, of the RAP-controlled site for approximately up to one year; (b) funding, and (c) continued use/operation, for approximately up to six years total use of the approximately 75-bed Bridge Home/Low Barrier Navigation Center facility for persons experiencing homelessness.

CITY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS  
BUREAU OF ENGINEERING  
1149 S. BROADWAY, 7th FLOOR  
LOS ANGELES, CALIFORNIA 90015  
CALIFORNIA ENVIRONMENTAL QUALITY ACT  
NOTICE OF EXEMPTION  
(Articles II and III – City CEQA Guidelines)

COUNTY CLERK'S USE

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650 and with the State Clearinghouse in the Governor's Office of Land Use and Climate Innovation, if filed with the County Clerk, pursuant to Public Resources Code Section 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> City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, 6th Floor, MS 939 Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b> <b>2</b>
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<b>PROJECT TITLE:</b> CD 2 Valley Plaza Park Pallet Housing at 6099 Laurel Canyon Blvd.	<b>LOG REFERENCE</b> C.F. 23-1022-S29
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**PROJECT LOCATION:** 6099 Laurel Canyon Blvd, Assessor Parcel Numbers (APN) 2334-002-900, in the North Hollywood Community Plan Area in the City of Los Angeles Council District 2 (CD 2), see Figure 1 - Project Location.

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

The 6099 Laurel Canyon Blvd. Pallet Housing Lease project (Project) involves (a) funding, (b) extended\ lease, for approximately up to one year; and (c) continued use/operation, for approximately up to six years total use of the pallet shelters with a bed count of 200 for individuals experiencing homelessness. The facility is operated pursuant to a third-party lease or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority). The facility will operate consistently with all Project approval requirements imposed by the City Council and applicable program requirements for bridge shelters, low barrier navigation centers, and/or interim or transitional homeless facilities including, but not limited to, the Project requirements stated in the attached narrative and project approval documents contained in City Council Clerk File No. 20-0841 and Board of Recreation and Park (RAP) Commission File No. 20-161. On \_\_\_\_\_ the City Council approved the Project and determined it was exempt from CEQA.

<b>CONTACT PERSON</b>	<b>CONTACT INFORMATION</b>
Maria Martin (Maria.Martin@lacity.org)	(213) 485-5753

<b>EXEMPT STATUS:</b>			
STATUTORY EXEMPTION	PUBLIC RESOURCE CODE	21080.27.5	
	GOVERNMENT CODE	8698.4	

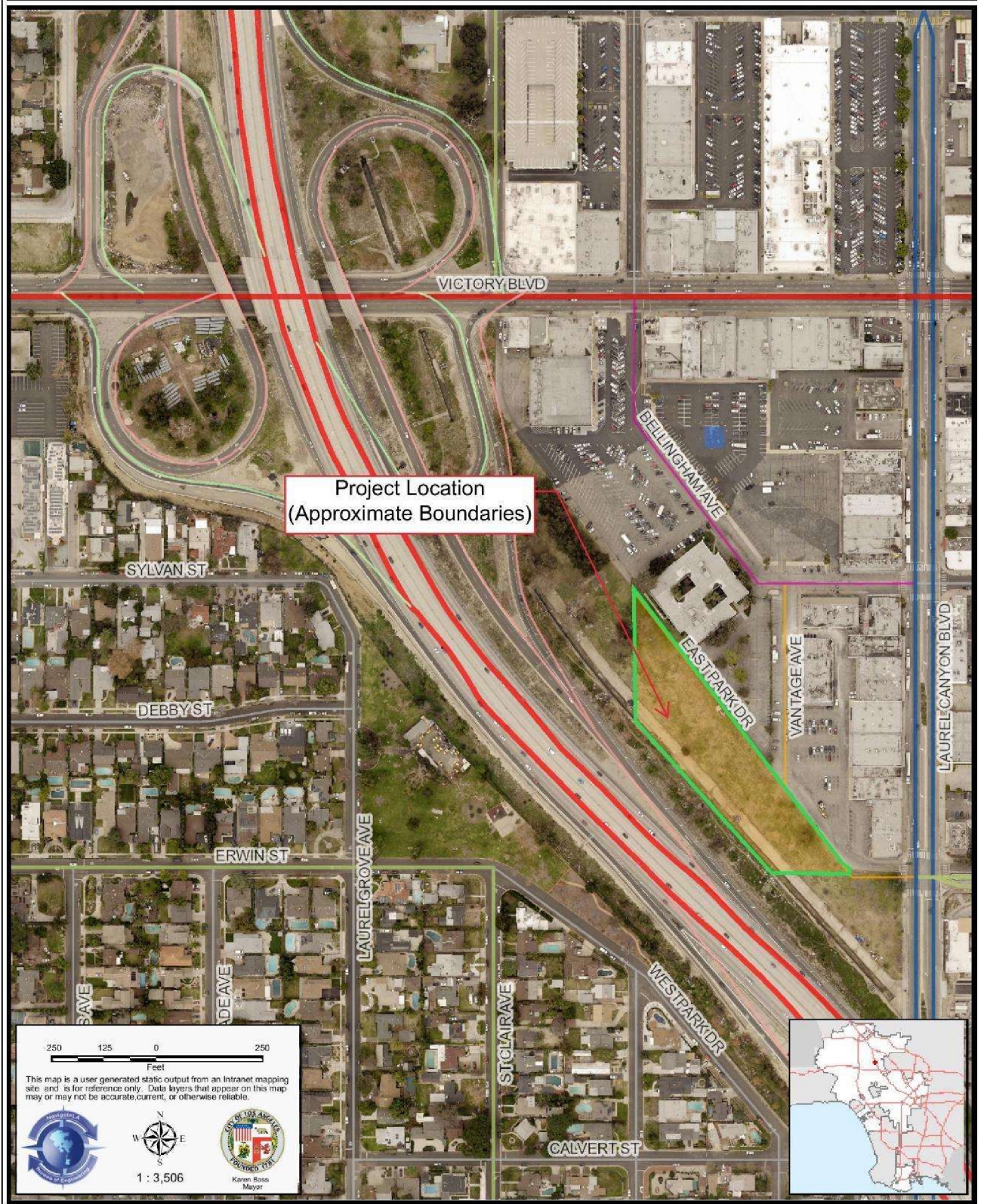
**JUSTIFICATION FOR PROJECT EXEMPTION:**

This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5 as a low barrier navigation center; and/or Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration.

**IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING**

<b>SIGNATURE:</b>  Pending project approval. Maria Martin	<b>TITLE:</b>  Environmental Affairs Officer Environmental Management Division	<b>DATE:</b> Pending project approval.
FEE: \$75.00	RECEIPT NO.	REC'D BY
		DATE

**Figure 1: Project Location**



## EXEMPTION NARRATIVE

### CEQA EXEMPTION NARRATIVE

#### I. PROJECT DESCRIPTION, CONTINUED

The Project concerns a homeless shelter facility serving persons experiencing homelessness in the City. It is operated pursuant to a third-party lease agreement or similar agreement awarded to a third-party service provider solicited by and governed by rules set by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate consistent with all Project approval requirements imposed by the City Council and the applicable program requirements for bridge shelters, low barrier navigation centers, and interim or transitional homeless facilities, including, but not limited to, the following Project requirements as they exist and are updated by LAHSA:

- LAHSA Program Standards (2024), <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- LAHSA Tiny Home Interim Housing Program, Scope of Required Services (2024-2025), <https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf>
- LAHSA Crisis/Bridge Housing for Adult Programs Scope of Required Services (2024), <https://www.lahsa.org/documents?id=7937-scope-required-services-srs-fy-24-25-crisis-bridge-housing-for-adults-programs-srs-and-appendixes-final.pdf>
- LAHSA Facility Standards (2023-2024), <https://www.lahsa.org/documents?id=2767-lahsafacility-standards.pdf>

Additional applicable LAHSA operations documents can be found on LAHSA's website at <https://www.lahsa.org/documents>. All service providers must comply with LAHSA's Scope of Required Services, Program Standards, and Facility Standards. Project operation will include a security plan consistent with the LAHSA's standards. Further, the Project will be operated consistent with the definition of Low Barrier Navigation Center at Government Code section 65660, subpart (a) as detailed below.

#### B. Service-Enriched Operations

The Project will follow LAHSA's operational standards to ensure that it is operated based on housing first principles and is a service-enriched facility. Under Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law), "'Housing First' means the evidence-based model that uses housing as a tool, rather than a reward, for recovery 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." (Welf. & Inst. Code § 8255(d)(1)).

Housing First 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." (*Id.*, § 8255(d)(2)(A).) 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 the tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to divert an individual from entry into the homelessness system successfully, a referral must

immediately be made to a CES Diversion/Prevention program. To identify other permanent housing options, service providers continue to have problem-solving conversations with the individual while the person resides in low barrier navigation centers, crisis and bridge housing. More broadly, the Project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness 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. LAHSA's Coordinated Entry System (CES) will be used to enter participants and facilitate service providers conducting assessments and providing services to connect people to resources and permanent housing. (LAHSA CES Brochure (2018), <https://www.lahsa.org/documents?id=1938-2018-coordinated-entry-system-ces-brochure.pdf>; see also <https://www.lahsa.org/ces/>.) The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are provided on a voluntary basis, and participants are not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers, and housing is not provided contingent upon participation in services, and thus the Project is operated based on housing first principles.

According to LAHSA's project requirements, service providers that oversee this facility must provide case management services and develop a Housing Stability Plan with each person. The shelter will program and implement 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 individual 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 individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing with a ninety (90) day goal. For as long as Los Angeles Municipal Code section 12.80 imposes a six-month residential durational limit, residents will not be permitted to reside at the Project facility for more than six months and if a resident has not been placed outside the Project facility within that time, the resident will be relocated to a different housing option.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills, and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits.

By creating a stable environment and providing access to basic needs, clients can maintain a consistent connection to outreach workers and case managers to create a path to interim or permanent housing.

## **II. The Project is exempt pursuant to Public Resources Code § 21080.27.5 as a Low Barrier Navigation Center**

Government Code section 65660, subpart (a) defines Low Barrier Navigation Centers (“LBNC”), as follows:

[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. A Low Barrier Navigation Center may be non-congregate and relocatable. “Low Barrier” means best practices to reduce barriers to entry, and may include, but is not limited to, the following: (1) The presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth; (2) Pets; (3) The storage of possessions; (4) Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.

Public Resources Code Section 21080.27.5 exempts from CEQA the following actions involving an LBNC:

1. A lease, or facilitating a lease, of land owned by the City for an LBNC.
2. An action associated with a lease for an LBNC.
3. Providing financial assistance to an LBNC.
4. Constructing and/or operating an LBNC.
5. Entering into a contract to provide services to an LBNC.

Following LAHSA’s operational standards, as detailed above in the Project Description, ensures that the Project operates as an LBNC, because the facility will follow housing first principles and operate as 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.

Further, the Project is a LBNC, because the Project is a low-barrier shelter based on implementing best practices to reduce barriers to entry, including, but not limited to, as follows:

Presence of partners. The presence of partners is allowed at the pallet housing/low barrier navigation center.

Pets. Participants are allowed in the pallet housing cabins.

Storage of possessions. The storage of possessions is provided in the cabins.

Privacy. Privacy to participants is provided through individual sleeping spaces in dual occupancy cabins that are separated with communal bathrooms.

Based on its years of experience providing shelters similar to this one and the requirements applicable to this Project, the City has determined that the above-noted operational actions for this project will ensure that the shelter is operated consistently with best practices for lowering barriers to

entry for people experiencing homelessness and that it is operated as a housing-first, service-enriched shelter.

The Project, therefore, is exempt from the requirements of CEQA pursuant to Public Resources Code Section 21080.27.5 because this Project involves a lease, or lease extension, of land owned by the City for a LBNC, is an action providing financial assistance to an LBNC and operating an LBNC, and approves entry into a contract to provide services to a LBNC as described above in the Project Description.

### **III. The Project is exempt pursuant to Government Code § 8698.4(a)(4)**

Upon the City's declaration of shelter crisis pursuant to Government Code Section 8698.4, subdivision (a)(2) of Section 8698.4 provides for streamlined approval of homeless shelters by the City. Subdivision (a)(1) of Section 8698.4 states that "[e]mergency housing may include homeless shelters for the homeless located or constructed on any land owned or leased by a city, county, or city and county, including land acquired with low- and moderate-income housing funds." Subdivision (a)(2)(B) further provides that "[t]his section applies only to a public facility or homeless shelters reserved entirely for the homeless pursuant to this chapter." (Gov. Code, § 8698.4, subd. (a)(2)(B).) Under Government Code Section 8698.4, subdivision (c)(1),

"Homeless shelter" means a facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless that is not in existence after the declared shelter crisis. A temporary homeless shelter community may include supportive and self-sufficiency development services. A "homeless shelter" shall include a parking lot owned or leased by a city, county, or city and county specifically identified as one allowed for safe parking by homeless and unstably housed individuals.

As detailed above in the Project Description, the Project will operate as a "homeless shelter," by complying with LAHSA's operational standards for homeless shelters, all Project approval requirements, and by providing overnight sleeping accommodations, with the primary purpose of providing temporary shelter for the homeless that is not in existence after the declared shelter crisis as stated above in the Project Description and according to all Project Approval records. Additionally, Los Angeles Municipal Code section 12.80 reflects the City's intent to utilize Section 8698.4 and the Project is consistent with that section based on the Project Description stated above.

Subdivision (a)(4) of Section 8698.4 exempts from CEQA the following actions taken by the City:

- (A) To lease, convey, or encumber land owned by a city, county, or city and county, or to facilitate the lease, conveyance, or encumbrance of land owned by the local government for a homeless shelter constructed pursuant to, or authorized by, this section.
- (B) To provide financial assistance to a homeless shelter constructed pursuant to, or authorized by, this section.
- (C) To approve a contract to provide services for people experiencing homelessness to a homeless shelter constructed pursuant to, or authorized by, this section. These services may include, but are not limited to, case management, resource navigation, security services, residential services, and counseling services.

The City Council declared a shelter crisis pursuant to Government Code Section 8698.4 on April 17, 2018, and the declaration remains in effect (City Council File Nos. 15-1138-S30, 15-1138-S33, and 15-1138-S40). Further, the City adopted local standards and procedures for the design, site development,

and operation of homeless shelters and the structures and facilities as required by Government Code section 8698.4 found at Los Angeles Municipal Code section 91.8605 and which were approved by the State as shown in the March 29, 2019 and November 17, 2019, Official Actions of the Los Angeles City Council, Council File No. 15-1138-S40.

The Project will be a public facility or homeless shelter reserved entirely for the homeless pursuant to the Shelter Crisis law at Chapter 7.8, of Division 1, of Title 2 of the Government Code.

The Project is located on city-owned land controlled by the Department of Recreation and Parks (RAP) located at 7570 Figueroa Street (Los Angeles County Assessor's Parcel Nos. 5691-017-803,902,904) and serves as a temporary homeless shelter. The shelter was approved by the Board of Recreation and Park Commissioner on June 17, 2021 (Board Report No 21-105) and a ROE permit for the operation of the shelter was executed between RAP and GSD.

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). The project involves the lease or a lease extension, of land owned by a city, (a) extended, or new lease, of the RAP-controlled site from approximately up to one year, (b) funding, and (c) continued use/operation, for approximately up to five years total use of the approximately 48-bed Tiny Home Village/ Low Barrier Navigation Center facility for persons experiencing homelessness.

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). The project involves the lease or a lease extension, of land owned by a city, (a) extended, or new lease, of the RAP-controlled site from approximately up to one year, (b) funding, and (c) continued use/operation, for approximately up to five years total use of the approximately 48-bed Tiny Home Village/ Low Barrier Navigation Center facility for persons experiencing homelessness.

**CITY OF LOS ANGELES**  
DEPARTMENT OF PUBLIC WORKS  
BUREAU OF ENGINEERING  
1149 S. BROADWAY, 7<sup>th</sup> FLOOR  
LOS ANGELES, CALIFORNIA 90015  
CALIFORNIA ENVIRONMENTAL QUALITY ACT  
**NOTICE OF EXEMPTION**  
(Articles II and III - City CEQA Guidelines)



Filing this notice with the County Clerk and State Clearinghouse in the Office of Planning and Research is optional, and it starts a 35-day statute of limitations on court challenges to the City's determination that the Project is not subject to CEQA. (Public Resources Code Section 21152(b), 21167(d).)

<b>LEAD CITY AGENCY AND ADDRESS:</b> City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	<b>COUNCIL DISTRICT</b> 1
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<b>PROJECT TITLE:</b> CD 1 Magnolia Ave Interim Housing Site Funding	<b>LOG REFERENCE</b> C.F. 23-1022-S29
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**PROJECT LOCATION:** 1933 Magnolia Avenue (LA County Assessor's Parcel No. 5056026006), in the South Los Angeles Community Plan Area, City of Los Angeles (City), Los Angeles Co. Figure 1: Project Location. T.G. 634-B6

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:** The 1933 Magnolia Ave Interim Housing/ Low Barrier Navigation Center (facility) Funding project (Project) involves allocating funds to the Los Angeles Homeless Services Authority (LAHSA) to provide a service contract and lease agreement with a third party service provider to operate the site. The facility will operate consistently with all Project approval requirements imposed by the City Council and applicable program requirements for bridge shelters, low barrier navigation centers, and/or interim or transitional homeless facilities including, but not limited to, the Project requirements stated in the attached narrative. On \_\_\_\_\_, the City Council approved the Project and determined it was exempt from CEQA.

<b>CONTACT PERSON</b> Maria Martin (maria.martin@lacity.org)	<b>TELEPHONE NUMBER</b> (213) 485-5753
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<b>EXEMPT STATUS:</b> STATE CEQA GUIDELINES	PUBLIC RESOURCE CODE 21080.27.5, 21080.10(c)	GOVERNMENT CODE 8698.4
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**JUSTIFICATION FOR PROJECT EXEMPTION:** This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; PRC Section 21080.10(c) as a contract approval providing homelessness services; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

<b>SIGNATURE:</b>  Martin	<b>TITLE:</b> Environmental Affairs Officer Environmental Management Division	<b>DATE:</b> 06/25/2024	
<b>FEE:</b> 75.00_____	<b>RECEIPT NO.</b>	<b>REC'D BY</b>	<b>DATE</b>

DISTRIBUTION: (1) County Clerk; (2) Agency Record



**CEQA EXEMPTION NARRATIVE**

**I. PROJECT DESCRIPTION, CONTINUED**

**A. Operational Governance**

The Project concerns a homeless shelter facility serving persons experiencing homelessness in the City. It is operated pursuant to a third-party lease agreement or similar agreement awarded to a third-party service provider solicited by and governed by rules set by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate consistent with all Project approval requirements imposed by the City Council and the applicable program requirements for bridge shelters, low barrier navigation centers, and interim or transitional homeless facilities, including, but not limited to, the following Project requirements as they exist and are updated by LAHSA:

- LAHSA Program Standards (2024), <https://www.lahsa.org/documents?id=2280-lahsa-program-standards.pdf>
- LAHSA Tiny Home Interim Housing Program, Scope of Required Services (2024-2025), <https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf>
- LAHSA Crisis/Bridge Housing for Adult Programs Scope of Required Services (2024), <https://www.lahsa.org/documents?id=7937-scope-required-services-srs-fy-24-25-crisis-bridge-housing-for-adults-programs-srs-and-appendixes-final.pdf>
- LAHSA Facility Standards (2023-2024), <https://www.lahsa.org/documents?id=2767-lahsafacility-standards.pdf>

Additional applicable LAHSA operations documents can be found on LAHSA’s website at <https://www.lahsa.org/documents>. All service providers must comply with LAHSA’s Scope of Required Services, Program Standards, and Facility Standards. Project operation will include a security plan consistent with the LAHSA’s standards. Further, the Project will be operated consistent with the definition of Low Barrier Navigation Center at Government Code section 65660, subpart (a) as detailed below.

**B. Service-Enriched Operations**

The Project will follow LAHSA’s operational standards to ensure that it is operated based on housing first principles and is a service-enriched facility. Under Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law), “Housing First’ means the evidence-based model that uses housing as a tool, rather than a reward, for recovery 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.” (Welf. & Inst. Code § 8255(d)(1)).

Housing First 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.” (*Id.*, § 8255(d)(2)(A).) 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 the tenant refuses assistance with housing search, location, and move-in assistance. If resources are needed to divert an individual from entry into the homelessness system successfully, a referral must immediately be made to a CES Diversion/Prevention program. To

identify other permanent housing options, service providers continue to have problem-solving conversations with the individual while the person resides in low barrier navigation centers, crisis and bridge housing. More broadly, the Project includes a housing and services plan and housing-focused case management, both with an orientation towards supporting individuals to exit to safe and stable housing. This Project meets the above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness 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. LAHSA's Coordinated Entry System (CES) will be used to enter participants and facilitate service providers conducting assessments and providing services to connect people to resources and permanent housing. (LAHSA CES Brochure (2018), <https://www.lahsa.org/documents?id=1938-2018-coordinated-entry-system-ces-brochure.pdf>; see also <https://www.lahsa.org/ces/>.) The basic underlying principle of LAHSA's System Components is that access to housing is the primary need for its program participants. Services are provided on a voluntary basis, and participants are not required to enter into a shelter. Individuals will not be rejected or exited from participation in the emergency shelter due to any unnecessary barriers, and housing is not provided contingent upon participation in services, and thus the Project is operated based on housing first principles.

According to LAHSA's project requirements, service providers that oversee this facility must provide case management services and develop a Housing Stability Plan with each person. The shelter will program and implement 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 individual 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 individuals through an individualized case management relationship that will ultimately translate to increased housing stability. The HFCMSS offers services to connect individuals to permanent housing. Case Managers present at the shelter make rapid connections to a broad continuum of resources and permanent housing, emphasizing a short-term stay.

HFCMSS connects families to a Housing Navigator who assists individuals to gain access to permanent housing through referrals to housing programs (such as RRH, Permanent Supportive Housing, affordable housing, etc.). A case manager is assigned to an individual when the person enters the program and then helps the participant establish a connection to a Housing Navigator. A Housing Navigator assists individuals with Housing Navigation services. Housing Navigation services are available to individuals to support their housing placement goals and must be focused on assisting the participant in identifying and accessing permanent housing with a ninety (90) day goal. For as long as Los Angeles Municipal Code section 12.80 imposes a six-month residential durational limit, residents will not be permitted to reside at the Project facility for more than six months and if a resident has not been placed outside the Project facility within that time, the resident will be relocated to a different housing option.

As noted in LAHSA's Program Standards, supportive services for the shelters focus on the income, resources, skills, and tools needed to pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police. The Program Standards also require service providers to utilize and maintain referral networks with specific lists of health services and public benefit services for connecting occupants to those benefits.

By creating a stable environment and providing access to basic needs, clients can maintain a

consistent connection to outreach workers and case managers to create a path to interim or permanent housing.

**II. The Project is exempt pursuant to Public Resources Code § 21080.27.5 as a Low Barrier Navigation Center**

Government Code section 65660, subpart (a) defines Low Barrier Navigation Centers (“LBNC”), as follows:

[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. A Low Barrier Navigation Center may be non-congregate and relocatable. “Low Barrier” means best practices to reduce barriers to entry, and may include, but is not limited to, the following: (1) The presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth; (2) Pets; (3) The storage of possessions; (4) Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.

Public Resources Code Section 21080.27.5 exempts from CEQA the following actions involving an LBNC:

1. A lease, or facilitating a lease, of land owned by the City for an LBNC.
2. An action associated with a lease for an LBNC.
3. Providing financial assistance to an LBNC.
4. Constructing and/or operating an LBNC.
5. Entering into a contract to provide services to an LBNC.

Following LAHSA’s operational standards, as detailed above in the Project Description, ensures that the Project operates as a LBNC, because the facility will follow housing first principles and operate as 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.

Further, the Project is a LBNC, because the Project is a low-barrier shelter based on implementing best practices to reduce barriers to entry, including, but not limited to, as follows:

Presence of partners. The presence of partners is allowed at this interim/low barrier navigation center.

Pets. Participants are allowed in this interim housing facility.

Storage of possessions. The storage of possessions is provided in the cabins.

Privacy. Privacy to participants is provided through individual sleeping spaces in dual occupancy cabins that are separate with communal bathrooms.

Based on its years of experience providing shelters similar to this one and the requirements applicable to this Project, the City has determined that the above-noted operational actions for this project will ensure that the shelter is operated consistently with best practices for lowering

barriers to entry for people experiencing homelessness and that it is operated as a housing-first, service-enriched shelter.

The Project, therefore, is exempt from the requirements of CEQA pursuant to Public Resources Code Section 21080.27.5 because this Project is a lease, or lease extension, of land owned by the City for an LBNC; is an action providing financial assistance to an LBNC and operating an LBNC, and approves entry into a contract to provide services to an LBNC, as described above in the Project Description.

### **III. The Project is exempt pursuant to Public Resources Code § 21080.10(c)**

Public Resources Code Section 21080.10, subdivision (c), exempts from CEQA local agency actions “to approve a contract for providing services for people experiencing homelessness.” This Project is exempt from CEQA because it involves the City and/or LAHSA entering into a lease or similar operating and/or funding agreement in the form of a contract with a service provider that will provide services for people experiencing homelessness. The City anticipates that the contract will provide services including, but not limited to, case management, resource navigation, security services, residential services, and counseling services.

### **IV. The Project is exempt pursuant to Government Code § 8698.4(a)(4)**

Upon the City’s declaration of shelter crisis pursuant to Government Code Section 8698.4, subdivision (a)(2) of Section 8698.4 provides for streamlined approval of homeless shelters by the City. Subdivision (a)(1) of Section 8698.4 states that “[e]mergency housing may include homeless shelters for the homeless located or constructed on any land owned or leased by a city, county, or city and county, including land acquired with low- and moderate-income housing funds.” Subdivision (a)(2)(B) further provides that “[t]his section applies only to a public facility or homeless shelters reserved entirely for the homeless pursuant to this chapter.” (Gov. Code, § 8698.4, subd. (a)(2)(B).)

Under Government Code Section 8698.4, subdivision (c)(1),

“Homeless shelter” means a facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless that is not in existence after the declared shelter crisis. A temporary homeless shelter community may include supportive and self-sufficiency development services. A “homeless shelter” shall include a parking lot owned or leased by a city, county, or city and county specifically identified as one allowed for safe parking by homeless and unstably housed individuals.

As detailed above in the Project Description, the Project will operate as a “homeless shelter,” by complying with LAHSA’s operational standards for homeless shelters, all Project approval requirements, and by providing overnight sleeping accommodations, with the primary purpose of providing temporary shelter for the homeless that is not in existence after the declared shelter crisis as stated above in the Project Description and according to all Project Approval records. Additionally, Los Angeles Municipal Code section 12.80 reflects the City’s intent to utilize Section 8698.4 and the Project is consistent with that section based on the Project Description stated above.

Subdivision (a)(4) of Section 8698.4 exempts from CEQA the following actions taken by the City:

- (A) To lease, convey, or encumber land owned by a city, county, or city and county, or to facilitate the lease, conveyance, or encumbrance of land owned by the local government for a homeless shelter constructed pursuant to, or authorized by, this section.
- (B) To provide financial assistance to a homeless shelter constructed pursuant to, or authorized by, this section.
- (C) To approve a contract to provide services for people experiencing homelessness to a homeless shelter constructed pursuant to, or authorized by, this section. These services may include, but are not limited to, case management, resource navigation, security services, residential services, and counseling services.

The City Council declared a shelter crisis pursuant to Government Code Section 8698.4 on April 17, 2018, and the declaration remains in effect (City Council File Nos. 15-1138-S30, 15-1138-S33, and 15-1138-S40). Further, the City adopted local standards and procedures for the design, site development, and operation of homeless shelters and the structures and facilities as required by Government Code section 8698.4 found at Los Angeles Municipal Code section 91.8605 and which were approved by the State as shown in the March 29, 2019 and November 17, 2019, Official Actions of the Los Angeles City Council, Council File No. 15-1138-S40.

The Project will be a public facility or homeless shelter reserved entirely for the homeless pursuant to the Shelter Crisis law at Chapter 7.8, of Division 1, of Title 2 of the Government Code.

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). The project involves providing funding to LAHSA to provide a service contract and lease agreement with a third party service provider to operate the site so the site can operate as Low Barrier Navigation Facility for persons experiencing homelessness.