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August 24, 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-S40 CD 15 RESIDENTIAL INTERIM HOUSING/LOW
BARRIER NAVIGATION CENTER (LBNC) AT 600 E. 116TH PLACE LEASE
EXTENSION CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICE 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 five years of the Residential Interim Housing/LBNC at 600 E. 116th Place in Council District 15.

RECOMMENDATIONS

Staff recommends that the Council find that the funding allocation, lease, and continued use for a period of up to five years for the Residential Interim Housing/LBNC at 600 E. 116th Place, for those experiencing homelessness, are statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, applicable to Low Barrier Navigation Centers; PRC Section 21080.10(c) as a contract approval providing homelessness services; and Government Code Section 8698.4(a)(4), governing homeless shelter projects under a shelter crisis declaration.

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)

TRANSMITTAL

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 in the Governor's Office of Land Use and Climate Innovation, 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.

LEAD CITY AGENCY AND ADDRESS:	City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 15
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PROJECT TITLE: 600 E. 116th Place - Residential Interim Housing Lease	LOG REFERENCE C.F. 23-1022-S40
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PROJECT LOCATION: 600 E. 116th Place - Residential Interim Housing in the Southeast Los Angeles Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 704 D7 to 704 E7

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The 600 E. 116th Place - Residential Interim Housing Lease project (Project) consists of the lease of an interim housing facility (facility) on an existing California Department of Transportation (Caltrans) Park & Ride lot, and involves (a) funding (b) a new lease, for approximately up to five years, and (c) operation of the interim housing for up to approximately 60 people experiencing homelessness. A third-party service provider will operate the Project for the City and it is anticipated that a lease or similar operating and/or funding agreement may be executed. The purpose of the Project is to provide emergency shelter, low barrier navigation center services, and case management for people experiencing homelessness. Project beneficiaries include people experiencing homelessness and the community. (Please see the attached narrative for more details.)

On _____, 2026, the City Council determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: Statutory

PUBLIC RESOURCE CODE 21080.27.5 & 21080.10(c)
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; PRC Section 21080.10(c) as a contract approval providing homelessness services; and/or Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notices of Exemption (NOEs) supporting documents in Council Files (CFs) No. 20-0841-S23 and No. 20-0841-S46, and consistent with, and supported by, the City Council's prior actions approving the development and use of this shelter. Additional support is provided in the attached narrative.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: Pending Project approval. Maria Martin		TITLE: Environmental Affairs Officer Environmental Management Division	DATE:
FEE: 75.00_____	RECEIPT NO.	REC'D BY	DATE

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Figure 1: Project Location



EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, CONTINUED

The City will continue to operate residential interim housing on a portion of a Caltrans-owned Park & Ride, the Avalon Green Line lot, in furtherance of providing emergency shelter and low barrier navigation services in the City, as further described in the section below. On May 31, 2022, the City Council found a Tiny Home Village facility proposed at this site to be statutorily exempt (CF No. 20-0841). The documents supporting this determination (CF No. 20-0841-S23) are incorporated herein by reference as support for this CEQA determination. On April 5, 2024, the City Council approved a design concept modification from a Tiny Home Village to a residential interim housing concept. The documents supporting this determination (CF No. 20-0841-S46) are incorporated herein by reference as support for this CEQA determination.

The facility houses approximately 60 individuals on a portion, approximately 18,925 square feet, of the Avalon Green Line Park & Ride lot that includes modular units that sleep up to four individuals. The Project's main objectives remain the same, to provide emergency shelter, low barrier navigation center services, and case management for people experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing.

The Project site is located on a Caltrans Park & Ride lot, southeast of the Avalon Boulevard and 116th Place intersection. The site consists of ten rectangular shaped lots with an area of approximately 38,000 square feet and frontages along 116th Place and Avalon Boulevard. There are residential uses to the north and west of the site and surface transportation facilities to the south of the site.

A. Operational Governance

The Project concerns a homeless shelter facility that serves persons experiencing homelessness in the City. It will continue to be 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 continue to 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 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.

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 facility is an LBNC, because the it 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 residential units.

Pets. Pets are allowed in the residential units and the site includes a pet relief area.

Storage of possessions. The storage of possessions is provided in the residential units and lockers.

Privacy. Privacy to participants is provided through separate units that include sleeping spaces for four.

Based on its years of experience providing shelters similar to this one and the requirements applicable to this facility, 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 consists of a lease, or lease extension, of State-owned land leased by the City for a LCNC, 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 provides for 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.

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

Sincerely,


box SIGN 4L7KX8JK-17X6QY26

Crystal Lee, PE, MSCE, ENV-SP, SHRM
City Engineer

CL/:mem:cf

Box\EXE\City Engineer\2026 City Engineer Signed Correspondence\Council
Files\TRANSMITTAL CF 23-1022-S40 600 E 116th Pl.docx

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