BOARD OF PUBLIC WORKS MEMBERS STEVES. KANG CITY OF LOS ANGELES

CALIFORNIA

PRESIDENT

JENNY CHAVEZ

JENNY CHAVEZ VICE PRESIDENT

JOHN GRANT
PRESIDENT PRO TEMPORE

FAITH I. MITCHELL COMMISSIONER

> VACANT COMMISSIONER

ELYSE MATSON EXECUTIVE OFFICER



KAREN BASS

June 13, 2025

DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ALFRED MATA, PE

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

http://eng.lacity.org

Honorable Marqueece Harris-Dawson President Los Angeles City Council

c/o Petty Santos Interim City Clerk City Hall Room 360

CD 2 ALEXANDRIA PARK TINY HOME VILLAGE (THV)/LOW BARRIER NAVIGATION CENTER AT 6099 LAUREL CANYON BOULEVARD, CD 15 HARBOR PARK TINY HOME VILLAGE (THV)/LOW BARRIER NAVIGATION CENTER AT 1221 N. FIGUEROA PLACE, CD 1 CAZA AZUL BRIDGE HOUSING/LOW BARRIER NAVIGATION CENTER AT 1920 W 3RD STREET. CD 14 544 TOWNE AVENUE REFRESH SPOT HOMELESS SERVICE CENTER LEASE EXTENSIONS; AND CD 14 EAGLE ROCK TINY HOME VILLAGE (THV)/LOW BARRIER NAVIGATION CENTER AT 7570 FIGUEROA STREET, CD 13 BRIDGE HOUSING/LOW BARRIER NAVIGATION CENTER AT 1533 SCHRADER BOULEVARD, CD 13 TINY HOME VILLAGE (THV)/LOW BARRIER NAVIGATION CENTER AT 2301 W. 3RD STREET, CD 15 BRIDGE HOUSING/LOW BARRIER NAVIGATION CENTER AT 2316 E. IMPERIAL HIGHWAY. CD 14 BRIDGE HOUSING/LOW BARRIER NAVIGATION CENTER AT 310 N. MAIN STREET, CD 4 BRIDGE HOUSING/LOW BARRIER NAVIGATION CENTER AT 3248 RIVERSIDE DRIVE, CD 15 BRIDGE HOUSING/LOW BARRIER NAVIGATION CENTER AT 828 EUBANK AVENUE, AND CD 14 TINY HOME VILLAGE (THV)/LOW BARRIER NAVIGATION CENTER LOCATED ADJACENT TO AND NORTH OF THE AVENUE 60 AND ARROYO DRIVE ITNERSECTION CHANGE IN SERVICE PROVIDERS (C.F. No. 23-1022-S16), CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF EXEMPTION (NOE)

Dear President Harris-Dawson and Honorable Council 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

Honorable Marqueece Harris-Dawson June 13, 2025 Page 2 of 3

period of approximately one year of CD 2 Alexandria Park Tiny Home Village (THV)/low barrier navigation center at 6099 Laurel Canyon Boulevard and the CD 15 Harbor Park Tiny Home Village (THV)/low barrier navigation center at 1221 N. Figueroa Place; and for a period of approximately three years for the CD 1 Caza Azul Bridge Housing/low barrier navigation center at 1920 W 3rd Street; and for a period of approximately two years for the CD 14 544 Towne Avenue ReFresh Spot Homeless Service Center.

The attached environmental documentation is also being transmitted for City Council's consideration related to the funding allocation, lease, change in service provider and continued use for a period of approximately one year for the CD 14 Eagle Rock Tiny Home Village (THV)/low barrier navigation center at 7570 Figueroa Street, the CD 13 Bridge Housing/low barrier navigation center at 1533 Schrader Boulevard, the CD 13 Tiny Home Village (THV)/low barrier navigation center at 2301 W. 3rd Street, the CD 15 Bridge Housing/low barrier navigation center at 2316 E. Imperial Highway, the CD 14 Bridge Housing/low barrier navigation center at 3248 Riverside Drive, the CD 15 Bridge Housing/low barrier navigation center at 828 Eubank Avenue, and the CD 14 Tiny Home Village (THV)/low barrier navigation center located adjacent to and north of the Avenue 60 and Arroyo Drive intersection.

RECOMMENDATIONS

Staff recommends that the Council find that the funding allocation, lease, and continued use for an additional period of approximately one year of the Alexandria Park Tiny Home Village (THV)/low barrier navigation center at 6099 Laurel Canyon Boulevard and the Harbor Park Tiny Home Village (THV)/low barrier navigation center at 1221 N. Figueroa Place; and for a period of approximately three years for the Caza Azul bridge housing/low barrier navigation center at 1920 W. 3rd Street, for those experiencing homelessness, are statutorily exempt from CEQA 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, lease, and continued use for an additional period of approximately two years for the 544 Towne Avenue ReFresh Spot Homeless Service Center are statutorily exempt from CEQA under PRC Section 21080.10(c) applicable to contracts providing services to people experiencing homelessness.

Staff recommends that the Council find that the funding allocation, lease, change in service provider and continued use for an additional period of approximately one year for the Eagle Rock Tiny Home Village (THV)/low barrier navigation center at 7570 Figueroa Street, the Bridge Housing/low barrier navigation center at 1533 Schrader Boulevard, the Tiny Home Village (THV)/low barrier navigation center at 2301 W. 3rd Street, the Bridge Housing/low barrier navigation center at 2316 E. Imperial Highway, the Bridge

Honorable Marqueece Harris-Dawson June 13, 2025 Page 3 of 3

Housing/low barrier navigation center at 310 N. Main Street, the Bridge Housing/low barrier navigation center at 3248 Riverside Drive, the Bridge Housing/low barrier navigation center at 828 Eubank Avenue, and the Tiny Home Village (THV)/low barrier navigation center located adjacent to and north of the Avenue 60 and Arroyo Drive intersection 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 or (213) 485-5753.

Sincerely,

Alfred Mata, PE Interim City Engineer

alfred Mata

TA/PS/MM;jm

EXE\ 2025 City Engineer\TRANSMITTAL BOE Report CF 2X-23-1022-S16.pdf

Attachment

cc: Deborah Weintraub, Bureau of Engineering Patrick Schmidt, Bureau of Engineering Marina Quinones, Bureau of Engineering Maria Martin, Bureau of Engineering

ATTACHMENT CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) NOTICES OF EXEMTPION for

- CD 2 Alexandria Park Tiny Home Village (THV)/low barrier navigation center at 6099 Laurel Canyon Boulevard Lease
- CD 15 Harbor Park Tiny Home Village (THV)/low barrier navigation center at 1221 S. Figueroa Place Lease
- CD 1 Caza Azul Bridge Housing/low barrier navigation center at 1920 W 3rd Street Lease
- CD 14 CD 14 544 Towne Avenue ReFresh Spot Homeless Service Center Lease
- CD 14 Eagle Rock Tiny Home Village (THV)/low barrier navigation center at 7570 Figueroa Street Lease
- CD 13 Bridge Housing/low barrier navigation center at 1533 Schrader Boulevard Lease
- CD 13 Tiny Home Village (THV)/low barrier navigation center at 2301 W. 3rd Street Lease
- CD 15 Bridge Housing/low barrier navigation center at 2316 E. Imperial Highway Lease
- CD 14 Bridge Housing/low barrier navigation center at 310 N. Main Street Lease
- CD 4 Bridge Housing/low barrier navigation center at 3248 Riverside Drive Lease
- CD 15 Bridge Housing/low barrier navigation center at 828 Eubank Avenue Lease
- CD 14 Tiny Home Village (THV)/low barrier navigation center located adjacent to and north of Avenue 60 and Arroyo Drive Intersection Lease

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)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project

COUNCIL DISTRICT

City of Los Angeles	-\			
c/o Bureau of Engineering (BO	=)		2	
1149 S. Broadway, MS 939				
Los Angeles, CA 90015 PROJECT TITLE:			LOG REFERENCE	
	Laural Canyon Blyd Los	150	LOG REFERENCE	
CD 2 Tiny Home Village (THV) at 6099 PROJECT LOCATION:	Laurei Cariyon Bivd. Lea	ise		
6099 Laurel Canyon Blvd., Assessor F North Hollywood - Valley Village Comm - Project Location. T.G. 794-B5, B6, & G	iunity Plan Area Ìn the Cit C5.	y of Los Angeles Council D		
DESCRIPTION OF NATURE, PURPOSE The CD 2 Tiny Home Village (THV) extended, or new lease, for approximate years total use of the THV pallet shelter is operated pursuant to a third-party established by the Los Angeles Home Project approval requirements imposed barrier navigation centers, and/or interequirements stated in the attached narrand Board of Recreation and Park (RA Park Commission determined the Project (RAP Commission exempt from the California Environment)	at 6099 Laurel Canyon rely up to one year; and (rely up to one year; and (rely up to one year; and (related one one year) and a rim or transitional home rative and project approved one of the No. 25-058). On	Blvd. Lease project (Project c) continued use/operation, of for individuals experiencing tent with the City pursuant (LAHSA). The facility will capplicable program requirem less facilities including, but all documents contained in Control on April 17, 2025, the California Environment, 2025, the City	for approximately up to five g homelessness. The facility to operational procedures operate consistently with all ments for bridge shelters, low to not limited to, the Project city Council File No. 20-0841 the Board of Recreation and al Quality Act (CEQA) and	
CONTACT PERSON Maria Martin (maria.martin@lacity.org)		EPHONE NUMBER 3) 485-5753		
EXEMPT STATUS: STATUTORY	1			
	PUBLIC RESOURCE C 21080.27.5	CODE GOVER 8698.4	NMENT CODE	
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 Notice of Exemption (NOE) supporting documents in Council File No. 20-0841 and in Board of Recreation and Park (RAP) Commission File Nos. 20-161 and 25-058; and consistent with, and supported by, the City Council's prior actions approving the development and use of this Pallet Shelter THV/low barrier navigation center (see the attached narrative).				
Commission File Nos. 20-161 and 25	nts in Council File No. -058; and consistent wi	20-0841 and in Board of F th, and supported by, the	Recreation and Park (RAP) City Council's prior actions	
Commission File Nos. 20-161 and 25	nts in Council File No. -058; and consistent wi this Pallet Shelter THV/lo	20-0841 and in Board of F th, and supported by, the w barrier navigation center	Recreation and Park (RAP) City Council's prior actions	
Commission File Nos. 20-161 and 25 approving the development and use of	nts in Council File No. 1-058; and consistent withis Pallet Shelter THV/locentrial ERTIFIED DOCUMENT (TITIED TOVAL).	20-0841 and in Board of Fith, and supported by, the w barrier navigation center DF EXEMPTION FINDING	Recreation and Park (RAP) City Council's prior actions (see the attached narrative). DATE:	
Commission File Nos. 20-161 and 25 approving the development and use of IF FILED BY APPLICANT, ATTACH CISIGNATURE: Pending Project app	nts in Council File No. 1-058; and consistent withis Pallet Shelter THV/locentrial ERTIFIED DOCUMENT (TITIFIED DOCUMENT (TITIFIED ENVEL)	20-0841 and in Board of Fith, and supported by, the wide barrier navigation center DF EXEMPTION FINDING LE: ironmental Affairs Officer	Recreation and Park (RAP) City Council's prior actions (see the attached narrative). DATE:	

LEAD CITY AGENCY AND ADDRESS:



Page 2 of 7

CEQA EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION

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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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. The majority of the 103 detached pallet shelters are for double occupancy, which allows for the presence of partners.

Pets. Participants' pets 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 Section 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, Section 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 land owned by the City of Los Angeles Department of Recreation and Parks Valley Park Plaza located at 6099 Laurel Canyon Boulevard and serves as a temporary homeless shelter. The shelter was approved by the Board of Recreation and Park Commissioner on August 6, 2020 (RAP Commission File No. 20-161) and on August 17, 2025 (RAP Commission File No. 25-058). A right of entry (ROE) permit for the operation of the shelter was executed between RAP and GSD extending from April 12, 2025 to April 11, 2026.

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). This project involves the lease or a lease extension, of land owned by a city, (a) extended, or a new lease, of the RAP-controlled site for approximately up to one year; (b) funding, and (c) continued use/operation, one year; (b) funding, and (c) continued use/operation, for approximately up to five years total use.

CITY OF LOS ANGELES

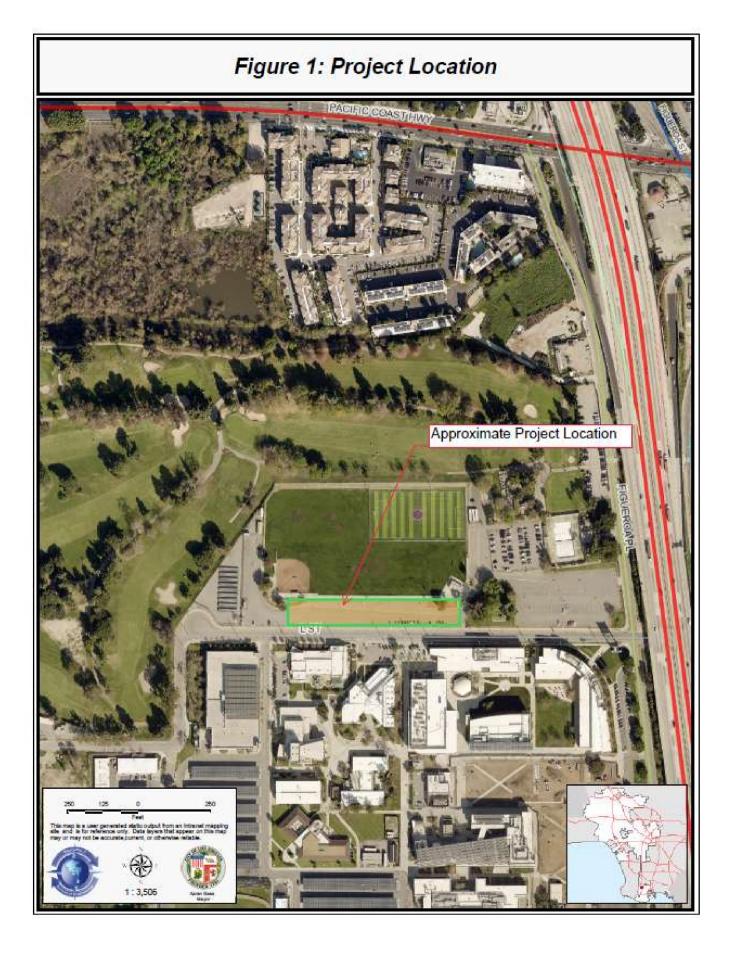
DEPARTMENT OF PUBLIC WORKS **BUREAU OF ENGINEERING** 1149 S. BROADWAY, 7th FLOOR LOS ANGELES, CALIFORNIA 90015 CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project

approval of the project.					
LEAD CITY AGENCY				T	COUNCIL DISTRICT
City of Los Ar					15
	Engineering (BOE	-)			
	dway, MS 939				
Los Angeles,					
PROJECT TITLE: 12	21 N. Figueroa PI.	Tiny Home Village	Lease		LOG REFERENCE
Wilmington-Harbor C	ity Community Pla	in Area in Assesso		N) 7412-0	the Harbor City area of the 010-903, of the City of Los 794-B5, B6, & C5.
The 1221 S. Figueroa (a) funding, (b) external exproximately up to find facility is operated purposedures established with all Project approshelters, low barrier reproject requirements Nos. 20-0841-S2 and the California Environ	Place Tiny Homes nded, or new leas we years total use or rsuant to a third-pased by the Los Ange wal requirements in avigation centers, stated in the attach 120-0841-S46). O	s Village (THV) / Low se, for approximate of the approximately arty lease agreemer eles Homeless Serv apposed by the City and/or interim or tra and narrative and oth n, 202	ly up to three years; and 75 bed facility for person to resimilar agreement vices Authority (LAHSA). Council and the applicational homeless facilities project approval document the City Council deterwed the Project.	nd (c) co ons experi with the C The facil ble progra ities inclu uments co rmined th	y) project (Project) involves ontinued use/operation, for encing homelessness. The City pursuant to operational ity will operate consistently am requirements for bridge ding, but not limited to, the ontained in City Council File e Project was exempt from
CONTACT PERSON TELEPHONE NUMBER					
Maria Martin (maria.n			(213) 485-5753		
EXEMPT STATUS: S	STATUTORY				
		PUBLIC RESOUR 21080.27.5		GOVERI 8698.4	NMENT CODE
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 (NOE) supporting documents in Council File Nos. 20-0841-S2 and 20-0841-S46; and consistent with, and supported by, the City Council's prior actions approving the development and use of this THV/low barrier navigation center (see the attached narrative).					
			of this THV/IOW parrier	navigatio	of center (see the attached
narrative).			NT OF EXEMPTION FIN		on center (see the attached
narrative). IF FILED BY APPLIC					DATE:
narrative). IF FILED BY APPLIC SIGNATURE:		RTIFIED DOCUME	NT OF EXEMPTION FIN TITLE: Environmental Affairs C	NDING Officer	DATE:
narrative). IF FILED BY APPLIC SIGNATURE:	ANT, ATTACH CE	RTIFIED DOCUME	NT OF EXEMPTION FIN	NDING Officer	DATE:



CEQA EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION

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 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 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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 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, Section 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 be located on city-owned land controlled by the Department of Recreation and Parks (RAP) I at 1221 N. Figuero Place (Los Angeles County Assessor's Parcel No. 7412-010-903 and serves as a temporary homeless shelter. The shelter was approved by the Board of Recreation and Park Commissioner on September 17, 2020 (Board Report No. 20-179).

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). The project (a) funding, (b) extended, or new lease, for approximately up to three years; and (c) continued use/operation, for approximately up to five years total use of the approximately 75 bed 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)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

COUNCIL DISTRICT

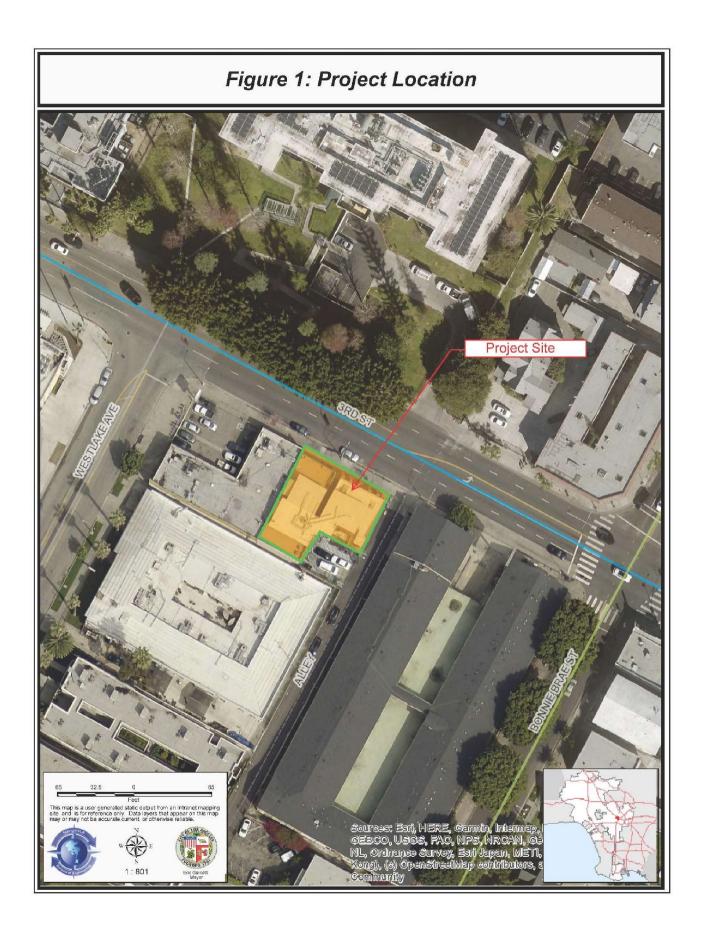
1

LEAD CITY AGENCY AND ADDRESS:

c/o Bureau of Engineering (BOE)

City of Los Angeles

1149 S. Broadway, MS 939 Los Angeles, CA 90015		
PROJECT TITLE: 1920 West 3rd Street (Caza Azul) A Br	idge House Lease	LOG REFERENCE
PROJECT LOCATION: 1920 West 3rd Street (Caza Azu		
Community Plan Area of the City of Los Angeles (City), L	os Angeles County. See Figure 1	: Project Location. T.G. 634
C2		
DESCRIPTION OF NATURE, PURPOSE, AND BENEFIC		
The 1920 West 3 rd Street (Casa Azul) A Bridge Housing (A		
involves (a) funding, (b) extended, or new lease, for app		
approximately up to seven years total use of the approximately (a) about the seven years total use of the approximately (b) about the seven years total use of the approximately (b) about the seven years total use of the approximately (c) about the seven years total use of the approximately (d) about the seven years total use of the approximately (d) about the seven years total use of the approximately (d) about the seven years total use of the approximately (d) about the seven years total use of the approximately (d) about the seven years total use of the approximately (d) about the seven years total use of the approximately (d) about the seven years total use of the approximately (d) about the seven years total use of the approximately (d) about the seven years total use of the approximately (d) about the seven years (d) about the seven		
and (d) change in service provider from People Assistin Mission, Inc. or another similar provider. The facility is of		
agreement with the City pursuant to operational procedure		
(LAHSA). The facility will operate consistently with all Projection		
applicable program requirements for bridge shelters, k		
homeless facilities including, but not limited to, the Project		
approval documents contained in City Council File Nos. 1		
the City Council determined the Project was exempt from t	he California Environmental Qualit	y Act (CEQA) and approved
the Project.		
CONTACT PERSON	TELEPHONE NUMBER	
Maria Martin (maria.martin@lacity.org)	(213) 485-5753	
EXEMPT STATUS: STATUTORY	205 0005 001/50	NIMENT CODE
PUBLIC RESOU 21080.27.5	RCE CODE GOVER 8698.4	NMENT CODE
21000.27.3	0090.4	
JUSTIFICATION FOR PROJECT EXEMPTION: This Pro		
	iect is statutorily exempt from CE	OA under Public Pescurces
	n center; and Government Code So	ection 8698.4 as a homeless
shelter project under a shelter crisis declaration. These det	n center; and Government Code Se erminations are consistent with the	ection 8698.4 as a homeless Notice of Exemption (NOE)
	n center; and Government Code Se erminations are consistent with the 341-S25 and 22-1157; and consis	ection 8698.4 as a homeless Notice of Exemption (NOE) tent with, and supported by,
shelter project under a shelter crisis declaration. These det supporting documents in Council File Nos. 18-0941, 20-0	n center; and Government Code Se erminations are consistent with the 341-S25 and 22-1157; and consis	ection 8698.4 as a homeless Notice of Exemption (NOE) tent with, and supported by,
shelter project under a shelter crisis declaration. These det supporting documents in Council File Nos. 18-0941, 20-06 the City Council's prior actions approving the development	n center; and Government Code Se erminations are consistent with the 341-S25 and 22-1157; and consis nt and use of this THV/low barrier	ection 8698.4 as a homeless Notice of Exemption (NOE) tent with, and supported by,
shelter project under a shelter crisis declaration. These det supporting documents in Council File Nos. 18-0941, 20-06 the City Council's prior actions approving the development attached narrative).	n center; and Government Code Se erminations are consistent with the 341-S25 and 22-1157; and consis nt and use of this THV/low barrier	ection 8698.4 as a homeless Notice of Exemption (NOE) tent with, and supported by,
shelter project under a shelter crisis declaration. These det supporting documents in Council File Nos. 18-0941, 20-06 the City Council's prior actions approving the development attached narrative). IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUM SIGNATURE: Pending Project approval.	n center; and Government Code Serminations are consistent with the 341-S25 and 22-1157; and consistent and use of this THV/low barrier ENT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer	ection 8698.4 as a homeless Notice of Exemption (NOE) tent with, and supported by, navigation center, (see the
shelter project under a shelter crisis declaration. These det supporting documents in Council File Nos. 18-0941, 20-06 the City Council's prior actions approving the development attached narrative). IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUM SIGNATURE: Pending Project approval. Maria Martin	n center; and Government Code Seerminations are consistent with the 341-S25 and 22-1157; and consistent and use of this THV/low barrier ENT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer Environmental Management Div	ection 8698.4 as a homeless Notice of Exemption (NOE) tent with, and supported by, navigation center, (see the DATE:
shelter project under a shelter crisis declaration. These det supporting documents in Council File Nos. 18-0941, 20-06 the City Council's prior actions approving the development attached narrative). IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUM SIGNATURE: Pending Project approval.	n center; and Government Code Serminations are consistent with the 341-S25 and 22-1157; and consistent and use of this THV/low barrier ENT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer	ection 8698.4 as a homeless Notice of Exemption (NOE) tent with, and supported by, navigation center, (see the
shelter project under a shelter crisis declaration. These det supporting documents in Council File Nos. 18-0941, 20-06 the City Council's prior actions approving the development attached narrative). IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUM SIGNATURE: Pending Project approval. Maria Martin	n center; and Government Code Seerminations are consistent with the 341-S25 and 22-1157; and consistent and use of this THV/low barrier ENT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer Environmental Management Div	ection 8698.4 as a homeless Notice of Exemption (NOE) tent with, and supported by, navigation center, (see the DATE:



CEQA EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION

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), <u>https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf</u>
- 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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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 ABH/low barrier navigation center.

Pets. Participants are allowed in the ABH facility and has a pet area.

Storage of possessions. The storage of possessions is provided within each sleeping area.

Privacy. Privacy to participants is provided through individual sleeping or family spaces 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 Section 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, Section 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 will be located on city-owned land located at 1920 West 3rd Street (Los Angeles County Assessor's Parcel No. 515-4027-036 and serves as a temporary homeless shelter.

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). The project involves (a) funding, (b) extended, or new lease, for approximately up to three years; and (c) continued use/operation, for approximately up to seven years total use of the approximately 41 bed 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)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC 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 Angele	es	COUNCIL DISTRICT		
c/o Bureau of Engineering (BOE)		14		
1149 S. Broadway, MS 939				
Los Angeles, CA 90015				
PROJECT TITLE: CD 14 Towne Ave Refresh Spot Homel	ess Services Center	LOG REFERENCE		
DDO IFOT LOCATION: 540, 544, 540 Taxas Ave Las Av				
PROJECT LOCATION: 542, 544, 546 Towne Ave. Los Ar				
the Harbor City area of the Wilmington-Harbor City Commu 903, of the City of Los Angeles (City), Los Angeles County,				
B5, B6, & C5.	Council District 15. See Figure 1.	Project Location, 1.G. 794-		
DESCRIPTION OF NATURE, PURPOSE, AND BENEFIC	IARIES OF PROJECT:			
The 542, 544, 546 Towne Homeless Services Center (facil		ındina. (b) extended, or new		
lease, for approximately up to two years; and (c) continued				
persons experiencing homelessness. The facility is ope				
agreement with the City pursuant to operational procedures	established by the Los Angeles F	Iomeless Services Authority		
(LAHSA). The facility will operate consistently with all Proje				
applicable program requirements for bridge shelters, lo				
homeless facilities including, but not limited to, the Project r				
approval documents contained in City Council Clerk Fil				
determined the Project was exempt from the California En		nd approved the Project.		
CONTACT PERSON	TELEPHONE NUMBER			
Maria Martin (maria.martin@lacity.org)	(213) 485-5753			
EXEMPT STATUS: STATUTORY				
PUBLIC RESOUF		NMENT CODE		
21080.27.5	8698.4			
JUSTIFICATION FOR PROJECT EXEMPTION: This Proj				
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 (NOE) supporting documents in Council File No. 19-				
0644; and consistent with, and supported by, the City Council's prior actions approving the development and use of this				
THV/low barrier navigation center (see the attached narrative).				
, , , , , , , , , , , , , , , , , , , ,				
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING				
SIGNATURE:	TITLE:	DATE:		
Pending Prcject approval.	Environmental Affairs Officer			
Maria Martin	Environmental Management Div			
FEE: 75.00 RECEIPT NO.	REC'D BY	DATE		
STRIBUTION: (1) County Clerk; (2) Agency Record				



CEQA EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION

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), <u>https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf</u>
- 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 § Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 (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 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, Section 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 will be located on privately owned lots located in the City of Los Angeles Council District 14 in the Central city Community Plan Area and is located on six lots with various street addresses along Town Ave and Stanford Ave; Assessor Parcel Nos. (APNs) 5147-020-010, 5147-020-011, 5147-020-012, 5147-020-017, 5147-020-018, 5147-020-019.

The Project is exempt because it involves one or more exempt actions under Government Code Section 8698.4, subdivision (a)(4). The project (a) funding, (b) extended, or new lease, for approximately up to two years; and (c) continued use/operation, for approximately up to six years total use for persons experiencing homelessness.

CITY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING 1149 S. BROADWAY, 7th FLOOR LOS ANGELES, CALIFORNIA 90015

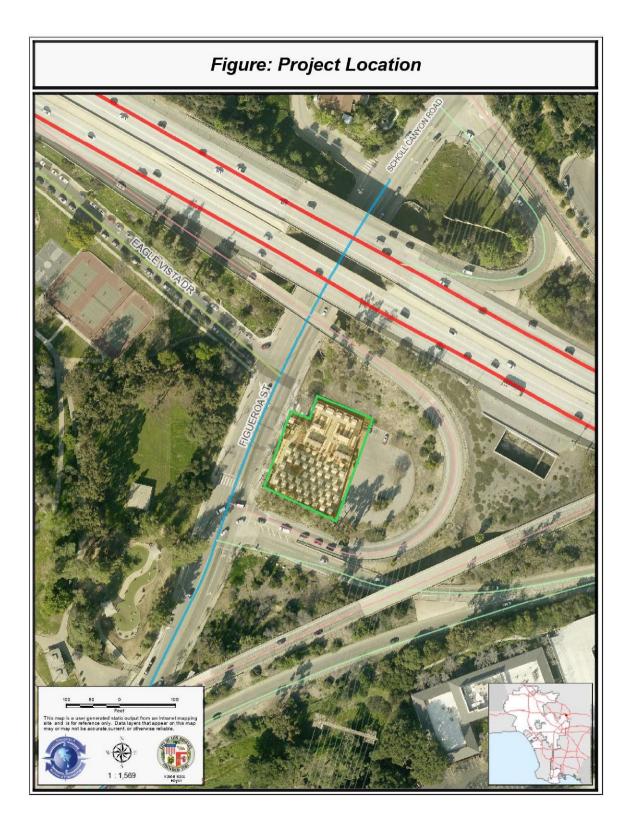
CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC 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:		COUNCIL DISTRICT		
City of Los Angeles		14		
c/o Bureau of Engineering (BOE				
1149 S. Broadway, MS 939				
Los Angeles, CA 90015				
	Recreation Center THV at 7570 Figueroa Street	LOG REFERENCE		
Change in Service Provider				
PROJECT LOCATION: 7570 Figueroa the Northeast Los Angeles Community Froject Location and the attached Project Location and the attached Projec	Street, Assessor Parcel Numbers (APNs) 5691-01 Plan Area in the City of Los Angeles Council Distric at Site Plan. T.G. 565 D5	7-902 and 5691-017-904, in t 14 (CD 14), see Figure 1 –		
	E, AND BENEFICIARIES OF PROJECT:			
	w Barrier Navigation Center (facility) project (Proje	ect) involves (a) funding (b)		
	y up to one year; and (c) change in service provider f			
	y is operated pursuant to a third-party lease agreeme			
	res established by the Los Angeles Homeless Serv			
facility will operate consistently 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				
	ct requirements stated in the attached narrative			
	e Nos. 19-0774-S1 and 20-0841-S52. On	, 2025, the City Council		
determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.				
CONTACT PERSON	TELEPHONE NUMBER			
Maria Martin (maria.martin@lacity.org)	(213) 485-5753			
EXEMPT STATUS: STATUTORY				
		RNMENT CODE		
	21080.27.5 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 Government Code Section 8698.4 as a homeless				
shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (NOE)				
supporting documents in Council File Nos. 20-0841-S52 and 22-1157; and consistent with, and supported by, the City				
Council's prior actions approving the development and use of this THV/low barrier navigation center (see the attached				
narrative).				
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING				
SIGNATURE:	TITLE:	DATE:		
Pending Project appr		· · -		
Maria Martin	Environmental Management Di	vision		
FEE: 75.00 RECEIPT NO.	REC'D BY	DATE		
FEE: 75.00 RECEIPT NO.				



Page 2 of 7

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 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 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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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 THV/low barrier navigation center.

Pets. Participants' pets 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 Section 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, Section 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 is located in 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, and 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 Right of Entry (ROE) permit for the operation of the shelter was executed between RAP and the Department of General Services (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 four 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, 7th FLOOR LOS ANGELES, CALIFORNIA 90015 CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the

approval of the project		Ü		
LEAD CITY AGENCY AND ADDRESS:		COUNCIL DISTRICT		
City of Los Angeles		13		
c/o Bureau of Engineering (BOE)				
1149 S. Broadway, MS 939				
Los Angeles, CA 90015				
PROJECT TITLE: Bridge Housing at 1533-35 N Schrad	ler Blvd Lease	LOG REFERENCE		
PROJECT LOCATION: 1533-35 N. Schrader Bouleva	ard, Bridge Housing, Los An	geles, CA 90028, in the		
Hollywood Community Plan Area of the City of Los An				
Location. T.G. 593 E4				
DESCRIPTION OF NATURE, PURPOSE, AND BENEFICE				
The (CD13) 1533 Schrader Blvd (ABH) / Low Barrier Na				
funding, (b) extended, or new lease, for approximately up to				
to Hope the Mission. The facility is operated pursuant to a t				
pursuant to operational procedures established by the Los				
will operate consistently with all Project approval requirements for bridge shelters, low barrier navigation cent				
but not limited to, the Project requirements stated in the				
contained in City Council File No. 20-0841-S25). On				
exempt from the California Environmental Quality Act (CEC		determined the rifoject was		
CONTACT PERSON	TELEPHONE NUMBER			
Maria Martin (maria.martin@lacity.org)	(213) 485-5753			
EXEMPT STATUS: STATUTORY	(210) 400 0700			
PUBLIC RESOUR	CE CODE COVER	NMENT CODE		
21080.27.5	8698.4	INIVILIAT CODE		
21000.27.3	0090.4			
JUSTIFICATION FOR PROJECT EXEMPTION: This Project	ect is statutorily exempt from CE	QA under Public Resources		
Code (PRC) Section 21080.27.5, as a low barrier navigation	center; and Government Code Se	ection 8698.4 as a homeless		
shelter project under a shelter crisis declaration. These dete				
supporting documents in Council File No. 20-0841-S25; ar				
actions approving the development and use of this ABH/lov	v barrier navigation center (see th	e attached narrative).		
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING				
SIGNATURE:	TITLE:	DATE:		
Pending Project approval.	Environmental Affairs Officer			
Maria Martin	Environmental Management Gro	oup		
FEE: 75.00 RECEIPT NO.	REC'D BY	DATE		
STRIBUTION: (1) County Clerk; (2) Agency Record	•	<u> </u>		



Page 2 of 7

CEQA EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION

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), <u>https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf</u>
- 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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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 ABH/low barrier navigation center.

Pets. Participants' pets are allowed in the ABH facility, which includes a pet area.

Storage of possessions. The storage of possessions is provided in the ABH facility. The facility provides storage within each sleeping area for personal possessions or storage bins.

Privacy. Privacy to participants is provided through the provision of sleeping spaces with partitions for individuals or families.

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 Section 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, Section 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 site is 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 Schrader Boulevard south of Selma Avenue at 1533-35 N. Schrader Boulevard.

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) funding, (b) extended, or new lease, for approximately up to one year.

CITY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT

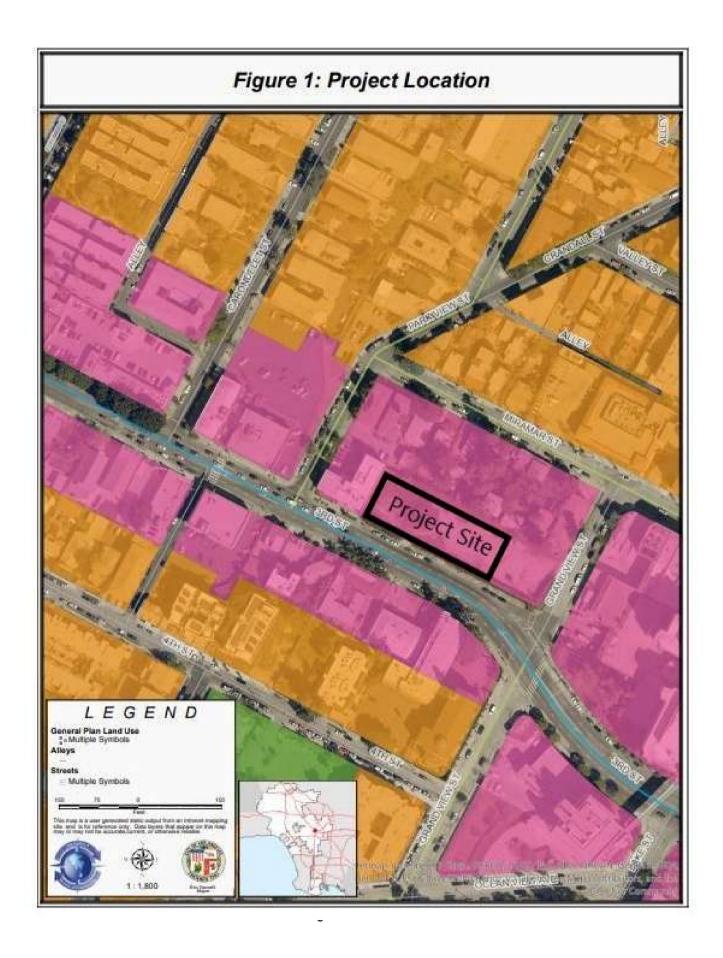
NOTICE OF EXEMPTION

(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project

approval of the project	ursuant to FIVE Section	in 2 1 107 (d), the filling of	Tills holice starts a 33-day statute c	or infinitations on c	ourt challeriges to the
LEAD CITY AGENCY	AND ADDRESS:			COUNCI	L DISTRICT
City of Los An					13
	Engineering (BOE)			
	dway, MS 939	,			
Los Angeles,					
PROJECT TITLE: 23		y Home Village (THV) Lease	LOG REI	FERENCE
PROJECT LOCATION	N: 2301 W 3rd S	t Los Angeles (CA 90028, in the Westlake	Community	Plan Area of the
			igure 1: Project Location.		
DESCRIPTION OF NA	ATURE, PURPOSI	E, AND BENEFICI	ARIES OF PROJECT:		
			on Center (facility) project (Project) invo	lves (a) funding,
			ne year; and (c) change in		
			d pursuant to a third-party		
			ocedures established by		
			e consistently with all Pro		
			rogram requirements for		
			eless facilities including, b		
			er project approval docume		
			ity Council determined the		
California Environme				i Tojoot Was	
CONTACT PERSON	ontal Quality 7 tot	(OLG) () and appl	TELEPHONE NUMBER		
Maria Martin (maria.m	artin@lacity.org)		(213) 485-5753		
EXEMPT STATUS: S			(213) 483-3733		
EXEMPL STATUS: 5		PUBLIC RESOUR	CE CODE GOV	ERNMENT C	ODE
		21080.27.5	8698		,ODE
		21000.27.3	0090	0.4	
JUSTIFICATION FOI	R PROJECT EXE	MPTION: This P	roject is statutorily exemp	t from CEC	A under Public
			parrier navigation center; an		
			crisis declaration. These d		
			nents in Council File No. 2		
			roving the development an		
navigation center (s	_		Toving the development an	a asc or tills	TITY/IOW Ballici
		•			
IF FILED BY APPLICA	ANT, ATTACH CEI	RTIFIED DOCUME	NT OF EXEMPTION FINDIN	G	
SIGNATURE:			TITLE:		DATE:
	nding Project appro	oval			
N/A		ovar.	Environmental Affairs Office		
FEE: 75.00	aria Martin RECEIPT NO.	ovar.	Environmental Affairs Office Environmental Management REC'D BY		DATE

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), <u>https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf</u>
- 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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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 THV/low barrier navigation center. The THV cabins allow for double occupancy.

Pets. Participants' pets are allowed in the THV cabins.

Storage of possessions. The storage of personal 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 Section 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, Section 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 site is 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 a portion of privately owned parcel at 2301 W. 3rd St.

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) funding, (b) extended, or new lease, for approximately up to one year.

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)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC 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:		COUNCIL DISTRICT	
City of Los Angeles		N/A	
c/o Bureau of Engineering (BOE)			
1149 S. Broadway, MS 939			
Los Angeles, CA 90015			
PROJECT TITLE: Bridge Housing at 2316 Imperial High	ghway Lease	LOG REFERENCE	
PROJECT LOCATION: 2316 Imperial Highway in the W	/illowbrook Area of the Los Ang	eles County. The location	
is adjacent to the City of Los Angeles Southeast Los Angeles community, which is in Council District 15 (CD			
15). See Figure 1: Project Location. T.G. 704 - H7	•	`	
DESCRIPTION OF NATURE, PURPOSE, AND BENEFIC	IARIES OF PROJECT:		
The (CD15) 2316 E. Imperial Hwy (ABH) / Low Barrier Na		Project) involves (a) funding,	
(b) extended, or new lease, for approximately up to one year			
to Keeping U Konnected. The facility is operated pursuant			
City pursuant to operational procedures established by t			
facility will operate consistently with all Project approval r	equirements imposed by the City	Council and the applicable	
program requirements for bridge shelters, low barrier navig	ation centers, and/or interim or tra	nsitional homeless facilities	
including, but not limited to, the Project requirements s	tated in the attached narrative	and other project approval	
documents contained in City Council Clerk File No. 20-08-			
the Project was exempt from the California Environmental	Quality Act (CEQA) and approved	I the Project.	
CONTACT PERSON	TELEBUIANE MUNICED		
	TELEPHONE NUMBER		
	(213) 485-5753		
	(213) 485-5753		
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUI	(213) 485-5753 RCE CODE GOVER	NMENT CODE	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY	(213) 485-5753	NMENT CODE	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUI	(213) 485-5753 RCE CODE GOVER	NMENT CODE	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUI 21080.27.5	(213) 485-5753 RCE CODE GOVER 8698.4		
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUR 21080.27.5 JUSTIFICATION FOR PROJECT EXEMPTION: This Pro-	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO	QA under Public Resources	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUI 21080.27.5	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEOn center; and Government Code Se	QA under Public Resources ection 8698.4 as a homeless	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUT 21080.27.5 JUSTIFICATION FOR PROJECT EXEMPTION: This Pro- Code (PRC) Section 21080.27.5, as a low barrier navigation	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEOn center; and Government Code Separations are consistent with the	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE)	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUR 21080.27.5 JUSTIFICATION FOR PROJECT EXEMPTION: This Proceed (PRC) Section 21080.27.5, as a low barrier navigation shelter project under a shelter crisis declaration. These determined to the state of the state	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Serminations are consistent with the nd consistent with, and supported	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUR 21080.27.5 JUSTIFICATION FOR PROJECT EXEMPTION: This Proceed (PRC) Section 21080.27.5, as a low barrier navigation shelter project under a shelter crisis declaration. These detections are supporting documents in Council File No. 20-0841-S28; as	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Seeminations are consistent with the nd consistent with, and supported w barrier navigation center (see the	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUR 21080.27.5 JUSTIFICATION FOR PROJECT EXEMPTION: This Pro Code (PRC) Section 21080.27.5, as a low barrier navigation shelter project under a shelter crisis declaration. These det supporting documents in Council File No. 20-0841-S28; a actions approving the development and use of this THV/lo IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUM	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Seeminations are consistent with the nd consistent with, and supported w barrier navigation center (see the	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUR 21080.27.5 JUSTIFICATION FOR PROJECT EXEMPTION: This Pro Code (PRC) Section 21080.27.5, as a low barrier navigation shelter project under a shelter crisis declaration. These det supporting documents in Council File No. 20-0841-S28; a actions approving the development and use of this THV/lo IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUM	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEOn center; and Government Code Septiminations are consistent with the nod consistent with, and supported w barrier navigation center (see the ENT OF EXEMPTION FINDING	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior attached narrative).	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUR 21080.27.5 JUSTIFICATION FOR PROJECT EXEMPTION: This Proceed (PRC) Section 21080.27.5, as a low barrier navigation shelter project under a shelter crisis declaration. These deta supporting documents in Council File No. 20-0841-S28; a actions approving the development and use of this THV/lost IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUM SIGNATURE:	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Septiminations are consistent with the nd consistent with, and supported w barrier navigation center (see the ENT OF EXEMPTION FINDING TITLE:	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior le attached narrative). DATE:	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUR 21080.27.5 JUSTIFICATION FOR PROJECT EXEMPTION: This Proceed (PRC) Section 21080.27.5, as a low barrier navigation shelter project under a shelter crisis declaration. These deta supporting documents in Council File No. 20-0841-S28; a actions approving the development and use of this THV/lo IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUM SIGNATURE: Pending Project approval.	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Secriminations are consistent with the nd consistent with, and supported w barrier navigation center (see the ENT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior le attached narrative). DATE:	
Maria Martin (maria.martin@lacity.org) EXEMPT STATUS: STATUTORY PUBLIC RESOUR 21080.27.5 JUSTIFICATION FOR PROJECT EXEMPTION: This Proposed (PRC) Section 21080.27.5, as a low barrier navigation shelter project under a shelter crisis declaration. These deta supporting documents in Council File No. 20-0841-S28; a actions approving the development and use of this THV/low IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUM SIGNATURE: Pending Project approval. Maria Martin	(213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO n center; and Government Code Se erminations are consistent with the nd consistent with, and supported w barrier navigation center (see the ENT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer Environmental Management Div	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior e attached narrative). DATE:	



Page 2 of 7

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), <u>https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf</u>
- 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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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 ABH/low barrier navigation center.

Pets. Participants' pets are allowed in the facility, which includes an outdoor pet area.

Storage of possessions. The storage of possessions is provided in a bin storage area.

Privacy. Privacy to participants is provided through partitions around beds in modular tent structures.

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 Section 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, Section 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 site is located in 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 a City-owned parcel at 2316 E Imperial Hwy.

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) funding, (b) extended, or new lease, for approximately up to one year.

CITY OF LOS ANGELES

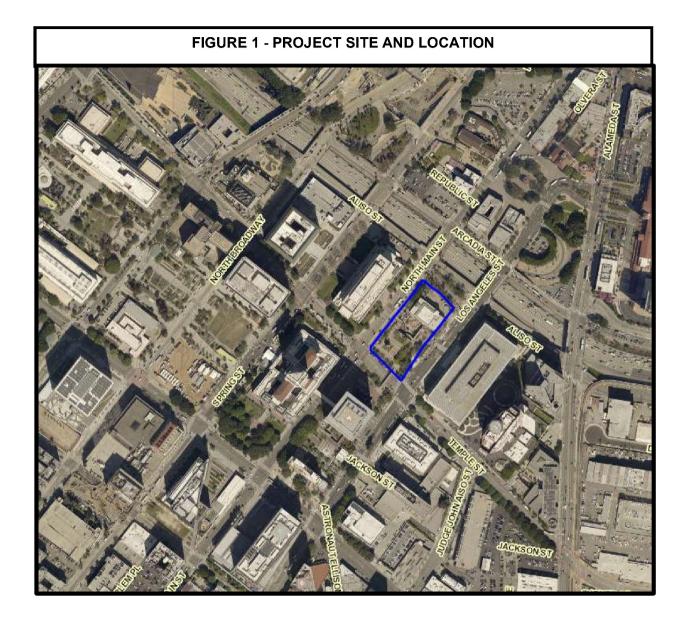
DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING 1149 S. BROADWAY, 7th FLOOR LOS ANGELES, CALIFORNIA 90015

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(Articles II and III - City CEQA Guidelines)
Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the

LEAD CITY AGENCY	AND ADDRESS:			COUNCIL DISTRICT
City of Los Ang				14
	Engineering (BOE)			
1149 S. Broad				
Los Angeles, (
	14 Civic Center Bridge	Housing at 310 N. Mair	n Street Lease	LOG REFERENCE
PROJECT LOCATION: 310 North Main Street, Space 300 Los Angeles, CA 90012, in the Central City Community Plan				
	Angeles, Council Distri			
DESCRIPTION OF NA	ATURE, PURPOSE, AN	ID BENEFICIARIES OF	PROJECT:	
				ct) involves (a) funding, (b)
				r from Weingart to Hope the
				ent with the City pursuant to
				SA). The facility will operate
				cable program requirements
				ties including, but not limited
				ocuments contained in City
	19-1570). On tal Quality Act (CEQA) :			roject was exempt from the
	tal Quality Act (CEQA)			
CONTACT PERSON	artin@lacity.org)		ONE NUMBER	
Maria Martin (maria.ma		(213) 48	0-0/03	
EXEMPT STATUS: ST			- 00/50	NIMENT CODE
		LIC RESOURCE CODE		NMENT CODE
	2108	30.27.5	8698.4	
				QA under Public Resources
				ection 8698.4 as a homeless
				Notice of Exemption (NOE)
				e City Council's prior actions
approving the develop	ment and use of this Th	HV/low barrier navigation	n center (see the attach	ned narrative).
IF FILED BY APPLICA	ANT, ATTACH CERTIFI	ED DOCUMENT OF EX	XEMPTION FINDING	
SIGNATURE:				
Day		TITLE:		DATE:
	nding Prcject approval.	Environn	nental Affairs Officer	
Ma	nding Prcject approval. aria Martin	Environn Environn	nental Management Div	rision
Ma		Environn	nental Management Div	



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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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 ABH/low barrier navigation center.

Pets. Participants' pets are allowed in the ABH, which includes an outdoor pet relief area.

Storage of possessions. The storage of possessions is provided in the sleeping cubicles and a bin storage area.

Privacy. Privacy to participants is provided through individual sleeping spaces/cubicles 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 Section 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, Section 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 site is 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 a City-owned parcel southwest of the intersection of Los Angeles Street and Aliso Street at 310 North Main Street.

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) funding, (b) extended, or new lease, for approximately up to one year.

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)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project

approval of the project					
LEAD CITY AGENCY	AND ADDRESS:			COUNCIL	DISTRICT
City of Los Ar					4
	Engineering (BOE)				
	dway, MS 939				
Los Angeles,					
PROJECT TITLE: Br	idge Housing at 3	248 Riverside Dr	. Lease	LOG REF	ERENCE
PROJECT LOCATIO	N: 3248 Riverside	Drive, in the Holl	ywood Community Plan Area	of the City	of Los Angeles
(City), Los Angeles					J
DESCRIPTION OF N	ATURE, PURPOSE	, AND BENEFICI	ARIES OF PROJECT:		
			ion Center (facility) project (Proj	ect) involve	es (a) funding, (b)
			and (c) change in service provid		
			a third-party lease agreement of		
			e Los Angeles Homeless Servic		
			quirements imposed by the City		
			ation centers, and/or interim or tra ated in the attached narrative		
			0841-S35, and 20-0841-S49. On		, 2025, the City
			fornia Environmental Quality Act		
Project.	to i rojout was one	mpt nom the can	orma Environmental Quality 7to	(OLG) ()	and approved the
CONTACT PERSON			TELEPHONE NUMBER		
Maria Martin (maria.m	artin@lacity.org)				
mana maran (mana.n	iartin@iacity.org)		(213) 485-5753		
EXEMPT STATUS: S			(213) 485-5753		
	TATUTORY	PUBLIC RESOUR	· /	NMENT C	ODE
	TATUTORY I	PUBLIC RESOUR 21080.27.5	· /	RNMENT C	ODE
,	TATUTORY I		CE CODE GOVER	NMENT C	ODE
EXEMPT STATUS: S	TATUTORY I	21080.27.5	CE CODE GOVER 8698.4		
EXEMPT STATUS: S	TATUTORY R PROJECT EXEM	21080.27.5 PTION: This Proje	CE CODE GOVER	QA under F	Public Resources
JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a	R PROJECT EXEM 21080.27.5, as a low a shelter crisis decla	21080.27.5 PTION: This Projet barrier navigation ration. These dete	CE CODE GOVER 8698.4 ect is statutorily exempt from CE center; and Government Code Someonic content with the	QA under Fection 8698	Public Resources 8.4 as a homeless Exemption (NOE)
JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents	R PROJECT EXEM 21080.27.5, as a low a shelter crisis decla is in Council File Nos	21080.27.5 PTION: This Project barrier navigation ration. These dete s. 19-0126, 20-084	CE CODE GOVER 8698.4 ect is statutorily exempt from CE center; and Government Code Someonic content with the 1-S35, and 20-0841-S49; and co	QA under Fection 8698 Notice of Ensistent wit	Public Resources 3.4 as a homeless Exemption (NOE) th, and supported
JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents by, the City Council's	R PROJECT EXEM 21080.27.5, as a low a shelter crisis decla is in Council File Nos	21080.27.5 PTION: This Project barrier navigation ration. These dete s. 19-0126, 20-084	CE CODE GOVER 8698.4 ect is statutorily exempt from CE center; and Government Code Someonic content with the	QA under Fection 8698 Notice of Ensistent wit	Public Resources 3.4 as a homeless Exemption (NOE) th, and supported
JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents	R PROJECT EXEM 21080.27.5, as a low a shelter crisis decla is in Council File Nos	21080.27.5 PTION: This Project barrier navigation ration. These dete s. 19-0126, 20-084	CE CODE GOVER 8698.4 ect is statutorily exempt from CE center; and Government Code Someonic content with the 1-S35, and 20-0841-S49; and co	QA under Fection 8698 Notice of Ensistent wit	Public Resources 3.4 as a homeless Exemption (NOE) th, and supported
JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents by, the City Council's attached narrative).	R PROJECT EXEM 21080.27.5, as a low a shelter crisis decla is in Council File Nos prior actions approv	PTION: This Project barrier navigation ration. These detects. 19-0126, 20-084 ving the developments.	CE CODE GOVER 8698.4 ect is statutorily exempt from CE center; and Government Code Someonic content with the 1-S35, and 20-0841-S49; and co	QA under Fection 8698 Notice of Ensistent wit	Public Resources 3.4 as a homeless Exemption (NOE) th, and supported
JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents by, the City Council's attached narrative).	R PROJECT EXEM 21080.27.5, as a low a shelter crisis decla is in Council File Nos prior actions approv	PTION: This Project barrier navigation ration. These detects. 19-0126, 20-084 ving the developments.	CE CODE GOVER 8698.4 ect is statutorily exempt from CE center; and Government Code Sominations are consistent with the 1-S35, and 20-0841-S49; and coent and use of this THV/low barrie NT OF EXEMPTION FINDING TITLE:	QA under Fection 8698 Notice of Ensistent witer navigation	Public Resources 3.4 as a homeless Exemption (NOE) th, and supported
JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents by, the City Council's attached narrative). IF FILED BY APPLICATION FOR SIGNATURE:	R PROJECT EXEM 1080.27.5, as a low a shelter crisis decla in Council File Nos prior actions approv	PTION: This Project barrier navigation ration. These detects. 19-0126, 20-084 ving the developments.	CE CODE GOVER 8698.4 ect is statutorily exempt from CE center; and Government Code Si rminations are consistent with the 1-S35, and 20-0841-S49; and co ent and use of this THV/low barrie NT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer	QA under Fection 8698 Notice of Ensistent witer navigation	Public Resources 8.4 as a homeless Exemption (NOE) th, and supported on center (see the
JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents by, the City Council's attached narrative). IF FILED BY APPLIC, SIGNATURE:	R PROJECT EXEM 1080.27.5, as a low a shelter crisis decla in Council File Nos prior actions approvement. ANT, ATTACH CER	PTION: This Project barrier navigation ration. These detects. 19-0126, 20-084 ving the development of the RTIFIED DOCUME	CE CODE GOVER 8698.4 ect is statutorily exempt from CE center; and Government Code Sominations are consistent with the 1-S35, and 20-0841-S49; and coent and use of this THV/low barries NT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer Environmental Management Div	QA under Fection 8698 Notice of Ensistent with the results of the	Public Resources 8.4 as a homeless Exemption (NOE) th, and supported on center (see the
JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents by, the City Council's attached narrative). IF FILED BY APPLICATION FOR SIGNATURE:	R PROJECT EXEM 1080.27.5, as a low a shelter crisis decla in Council File Nos prior actions approv	PTION: This Project barrier navigation ration. These detects. 19-0126, 20-084 ving the development of the RTIFIED DOCUME	CE CODE GOVER 8698.4 ect is statutorily exempt from CE center; and Government Code Si rminations are consistent with the 1-S35, and 20-0841-S49; and co ent and use of this THV/low barrie NT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer	QA under Fection 8698 Notice of Ensistent with the results of the	Public Resources 8.4 as a homeless Exemption (NOE) th, and supported on center (see the

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

Project Location

3248 Riverside Dr

FIGURE 1: PROJECT LOCATION

Imagery Date: 1/2/2020 34°06'52.04" N 118°16'18.59" W elev 0 ft eye alt 3281 ft

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 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 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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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 ABH/low barrier navigation center.

Pets. Participants' pets are allowed in the ABH, which includes an outdoor pet area.

Storage of possessions. The storage of possessions is provided within the sleeping areas and in a storage bin area.

Privacy. Privacy to participants is provided through sleeping area partitions 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 Section 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, Section 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 a City-owned property, controlled by the Department of Recreation and Parks located, at 3248 (3210 and 3428 also used previously) Riverside Drive. The development and operation of the facility were found to be statutorily exempt and approved by the Board of Recreation and Park Commissioners on September 4, 2019 (Board Report No. 19-179) and subsequently by the City Council on December 10, 2019 (CF No. 19-0126).

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) funding, (b) extended, or new lease, for approximately up to one year.

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)
Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the

LEAD CITY AGENCY	AND ADDRESS:		COUNCIL DISTRICT			
City of Los An	15					
c/o Bureau of						
1149 S. Broad						
Los Angeles,						
PROJECT TITLE: Bri	dge Housing at 828 N. Eu	ıbank Avenue Lease	LOG REFERENCE			
PROJECT LOCATION: 828 N. Eubank Avenue, in the Wilmington - Harbor City Community Plan Area of the						
City of Los Angeles (City), Los Angeles County (see Figure 1: Project Location, T.G. 794 - F6)						
DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:						
	The (CD 15) 828 Eubank Dr (ABH) / Low Barrier Navigation Center (facility) lease project (Project) involves (a) funding,					
			ce provider from US Vets to Holliday's			
			t or similar agreement with the City			
			vices Authority (LAHSA). The facility			
			Council and the applicable program sitional homeless facilities including,			
			d other project approval documents			
			City Council determined the Project			
		ality Act (CEQA) and approved th				
CONTACT PERSON		TELEPHONE NUMBER				
Maria Martin (maria.m	artin@lacity.org)	(213) 485-5753				
EXEMPT STATUS: S	TATUTORY					
		RESOURCE CODE	GOVERNMENT CODE			
	21080.27	7.5	8698.4			
			from CEQA under Public Resources			
			Code Section 8698.4 as a homeless			
			t with the Notice of Exemption (NOE)			
			upported by, the City Council's prior			
actions approving the development and use of this THV/low barrier navigation center (see the attached narrative).						
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING						
	ANT, ATTACH CERTIFIED D					
SIGNATURE:	<u> </u>	TITLE:	DATE:			
SIGNATURE:	nding Prcject approval.	TITLE: Environmental Affairs C	DATE:			
SIGNATURE:	nding Prcject approval. Iria Martin	TITLE: Environmental Affairs C Environmental Manage	DATE: Officer ment Division			
SIGNATURE:	nding Prcject approval.	TITLE: Environmental Affairs C	DATE:			



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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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 ABH/low barrier navigation center.

Pets. Participants' pets are allowed in the ABH, which includes a pen relief area.

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

Privacy. Privacy to participants is provided through the use of partitions around the sleeping areas.

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 Section 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, Section 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 is located in 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 on City-owned land located at 828 N. Eubank Avenue.

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) funding, (b) extended, or new lease, for approximately up to one year.

CITY OF LOS ANGELES

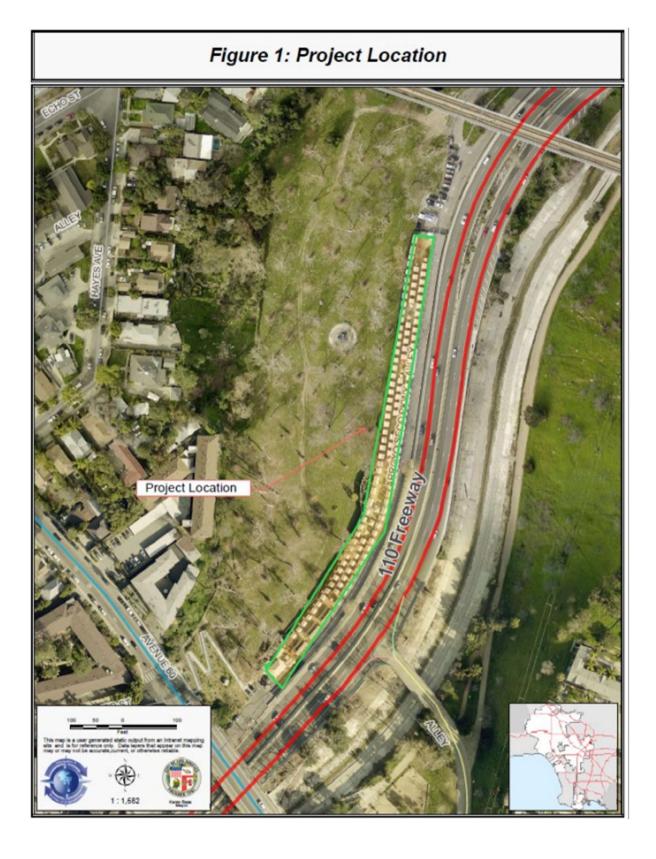
DEPARTMENT OF PUBLIC WORKS **BUREAU OF ENGINEERING** 1149 S. BROADWAY, 7th FLOOR LOS ANGELES, CALIFORNIA 90015 CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(Articles II and III - City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650, pursuant to Public Resources Code (PRC) Section 21152(b), and with the state Office of Land Use and Climate Innovation; and on the City website pursuant to PRC Section 21092.2(d). Pursuant to PRC 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			COUNCIL DISTRICT				
City of Los Ar	14						
c/o Bureau of							
1149 S. Broa	dway, MS 939						
Los Angeles,	CA 90015						
PROJECT TITLE: CI	0 14 THV Arroyo Seco Lease		LOG REFERENCE				
PROJECT LOCATION: Assessor's Parcel No. (APN) 5492-021-900, Northeast Los Angeles Community Plan							
Area, City and County of Los Angeles. See Figure 1: Project Location. T.G. 595 D2, D3, and D4.							
DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:							
	The Arroyo Seco Tiny Home Village (THV) / Low Barrier Navigation Center (facility) lease project (Project) involves (a)						
	, or new lease, for approximately up						
	The facility is operated pursuant to a						
	al procedures established by the Los						
will operate consisten	tly with all Project approval requirem	ents imposed by the City Council	and the applicable program				
requirements for bridg	e shelters, low barrier navigation cen	ters, and/or interim or transitional h	nomeless facilities including,				
but not limited to, th	e Project requirements stated in the	e attached narrative and other p	project approval documents				
contained in City Cou	ncil Clerk File No. 20-0841-S51). Or	າ, 2025, the City Coເ	uncil determined the Project				
was exempt from the	was exempt from the California Environmental Quality Act (CEQA) and approved the Project.						
CONTACT PERSON		TELEPHONE NUMBER	ι.				
CONTACT PERSON Maria Martin (maria.m	•		ι.				
	nartin@lacity.org)	TELEPHONE NUMBER	ι.				
Maria Martin (maria.m	nartin@lacity.org)	TELEPHONE NUMBER (213) 485-5753					
Maria Martin (maria.m	nartin@lacity.org) TATUTORY PUBLIC RESOUR	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER	NMENT CODE				
Maria Martin (maria.m	nartin@lacity.org)	TELEPHONE NUMBER (213) 485-5753					
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR	nartin@lacity.org) TATUTORY PUBLIC RESOUF 21080.27.5 R PROJECT EXEMPTION: This Project	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO	NMENT CODE QA under Public Resources				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2	nartin@lacity.org) PUBLIC RESOUF 21080.27.5 R PROJECT EXEMPTION: This Projection 1080.27.5, as a low barrier navigation	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEOn center; and Government Code Se	NMENT CODE QA under Public Resources ection 8698.4 as a homeless				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2	nartin@lacity.org) TATUTORY PUBLIC RESOUF 21080.27.5 R PROJECT EXEMPTION: This Project	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEOn center; and Government Code Se	NMENT CODE QA under Public Resources ection 8698.4 as a homeless				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a	nartin@lacity.org) PUBLIC RESOUF 21080.27.5 R PROJECT EXEMPTION: This Projection 1080.27.5, as a low barrier navigation	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEOn center; and Government Code Separations are consistent with the	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE)				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents	nartin@lacity.org) PUBLIC RESOUF 21080.27.5 R PROJECT EXEMPTION: This Projection of the control of the contro	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO n center; and Government Code Serminations are consistent with the nd consistent with, and supported	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents actions approving the	PUBLIC RESOUR 21080.27.5 R PROJECT EXEMPTION: This Projection of the control of	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Securinations are consistent with the nd consistent with, and supported w barrier navigation center (see the	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents actions approving the IF FILED BY APPLIC.	PUBLIC RESOUR 21080.27.5 R PROJECT EXEMPTION: This Project of the second secon	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Securinations are consistent with the nd consistent with, and supported w barrier navigation center (see the	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents actions approving the IF FILED BY APPLICATION SIGNATURE:	PUBLIC RESOUR 21080.27.5 R PROJECT EXEMPTION: This Project of the second secon	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO n center; and Government Code Se erminations are consistent with the nd consistent with, and supported w barrier navigation center (see the ENT OF EXEMPTION FINDING	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior he attached narrative).				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents actions approving the IF FILED BY APPLICATION SIGNATURE:	PUBLIC RESOUR 21080.27.5 R PROJECT EXEMPTION: This Project of the second secon	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Se erminations are consistent with the nd consistent with, and supported w barrier navigation center (see the ENT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior he attached narrative).				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents actions approving the IF FILED BY APPLICATION SIGNATURE:	PUBLIC RESOUR 21080.27.5 R PROJECT EXEMPTION: This Project a shelter crisis declaration. These detections in Council File No. 20-0841-S51; a development and use of this THV/low ANT, ATTACH CERTIFIED DOCUMINATION Project approval.	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Securinations are consistent with the nd consistent with, and supported w barrier navigation center (see the ENT OF EXEMPTION FINDING TITLE:	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior he attached narrative). DATE:				
Maria Martin (maria.m EXEMPT STATUS: S JUSTIFICATION FOR Code (PRC) Section 2 shelter project under a supporting documents actions approving the IF FILED BY APPLIC. SIGNATURE:	PUBLIC RESOUR 21080.27.5 R PROJECT EXEMPTION: This Project a shelter crisis declaration. These detection in Council File No. 20-0841-S51; a development and use of this THV/low ANT, ATTACH CERTIFIED DOCUMINATION Project approval. aria Martin	TELEPHONE NUMBER (213) 485-5753 RCE CODE GOVER 8698.4 ect is statutorily exempt from CEO center; and Government Code Securinations are consistent with the nd consistent with, and supported w barrier navigation center (see the ENT OF EXEMPTION FINDING TITLE: Environmental Affairs Officer Environmental Management Div	QA under Public Resources ection 8698.4 as a homeless Notice of Exemption (NOE) by, the City Council's prior he attached narrative).				



Page 2 of 7

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), <u>https://www.lahsa.org/documents?id=7223-scope-required-services-srs-tiny-home-village-program-srs-final-fy2024-2025.pdf</u>
- 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 Section 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.*, Section 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 Coordinated Entry System (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 abovenoted 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 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 Section 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 THV/low barrier navigation center, which allows double occupancy in the cabins.

Pets. Participants' pets 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 Section 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, Section 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 is located in 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. The Department of Recreation and Parks (RAP) issued a right-of-entry permit for the operation of the shelter located north of Avenue 60 and Arroyo Drive intersection.

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) funding, (b) extended, or new lease, for approximately up to one year.