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**DEPARTMENT OF
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**BUREAU OF
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ALFRED MATA, PE
INTERIM CITY ENGINEER

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LOS ANGELES, CA 90015-2213

<http://eng.lacity.org>

June 13, 2025

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 INTERSECTION 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

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 310 N. Main Street, the CD 4 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

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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

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 EXEMPTION
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

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 2
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PROJECT TITLE: CD 2 Tiny Home Village (THV) at 6099 Laurel Canyon Blvd. Lease	LOG REFERENCE
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PROJECT LOCATION:
6099 Laurel Canyon Blvd., Assessor Parcel Numbers (APN) 2334-002-900, in the North Hollywood Community of the North Hollywood - Valley Village Community Plan Area in the City of Los Angeles Council District 2 (CD 2), see Figure 1 - Project Location. T.G. 794-B5, B6, & C5.

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The CD 2 Tiny Home Village (THV) at 6099 Laurel Canyon Blvd. Lease project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) continued use/operation, for approximately up to five years total use of the THV pallet shelters with a bed count of 200 for individuals experiencing homelessness. The facility is operated pursuant to a third-party lease or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate consistently with all Project approval requirements imposed by the City Council and applicable program requirements for bridge shelters, low barrier navigation centers, and/or interim or transitional homeless facilities including, but not limited to, the Project requirements stated in the attached narrative and project approval documents contained in City Council File No. 20-0841 and Board of Recreation and Park (RAP) Commission File No. 20-161. On April 17, 2025, the Board of Recreation and Park Commission determined the Project was exempt under the California Environmental Quality Act (CEQA) and approved the Project (RAP Commission File No. 25-058). On _____, 2025, the City Council determined it was exempt from the California Environmental Quality Act (CEQA) and approved the project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and/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).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

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

Figure 1: Project Location



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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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
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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 Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 15
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PROJECT TITLE: 1221 N. Figueroa Pl. Tiny Home Village Lease	LOG REFERENCE
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PROJECT LOCATION: 1221 N. Figueroa Place, Harbor Park Sports Complex parking lot in the Harbor City area of the Wilmington-Harbor City Community Plan Area in Assessor's Parcel Number (APN) 7412-010-903, of the City of Los Angeles (City), Los Angeles County, Council District 15. See Figure 1: Project Location. T.G. 794-B5, B6, & C5.

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The 1221 S. Figueroa Place Tiny Homes Village (THV) / Low Barrier Navigation Center (facility) project (Project) involves (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. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council File Nos. 20-0841-S2 and 20-0841-S46). On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (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).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

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

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

Figure 1: Project Location



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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 1
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PROJECT TITLE: 1920 West 3rd Street (Caza Azul) A Bridge House Lease	LOG REFERENCE
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PROJECT LOCATION: 1920 West 3rd Street (Caza Azul), Bridge Housing, Los Angeles, CA, 90057 in the Westlake Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 634 C2

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The 1920 West 3rd Street (Casa Azul) A Bridge Housing (ABH) / Low Barrier Navigation Center (facility) project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to three years; (c) continued use/operation, for approximately up to seven years total use of the approximately 41 bed facility for persons experiencing homelessness; and (d) change in service provider from People Assisting the Homeless (PATH) to Hope the Mission, Los Angeles Mission, Inc. or another similar provider. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council File Nos. 18-0941, 20-0841-S25, and 22-1157). On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (NOE) supporting documents in Council File Nos. 18-0941, 20-0841-S25 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: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Division	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	DATE

Figure 1: Project Location



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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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 Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 14
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PROJECT TITLE: CD 14 Towne Ave Refresh Spot Homeless Services Center	LOG REFERENCE
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PROJECT LOCATION: 542, 544, 546 Towne Ave. Los Angeles, CA 90012, Harbor Park Sports Complex parking lot in the Harbor City area of the Wilmington-Harbor City Community Plan Area in Assessor's Parcel Number (APN) 7412-010-903, of the City of Los Angeles (City), Los Angeles County, Council District 15. See Figure 1: Project Location. T.G. 794-B5, B6, & C5.

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The 542, 544, 546 Towne Homeless Services Center (facility) project (Project) involves (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. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council Clerk File No. 19-0644). On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration.

These determinations are consistent with the Notice of Exemption (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: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Division	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	DATE

Figure: Project Location



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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's (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: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 14
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PROJECT TITLE: CD 14 Eagle Rock Recreation Center THV at 7570 Figueroa Street Change in Service Provider	LOG REFERENCE
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PROJECT LOCATION: 7570 Figueroa Street, Assessor Parcel Numbers (APNs) 5691-017-902 and 5691-017-904, in the Northeast Los Angeles Community Plan Area in the City of Los Angeles Council District 14 (CD 14), see Figure 1 – Project Location and the attached Project Site Plan. T.G. 565 D5

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The (CD14) 7570 Figueroa (THV) / Low Barrier Navigation Center (facility) project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) change in service provider from Union Station Homeless Services to Hope the Mission. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council File 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 Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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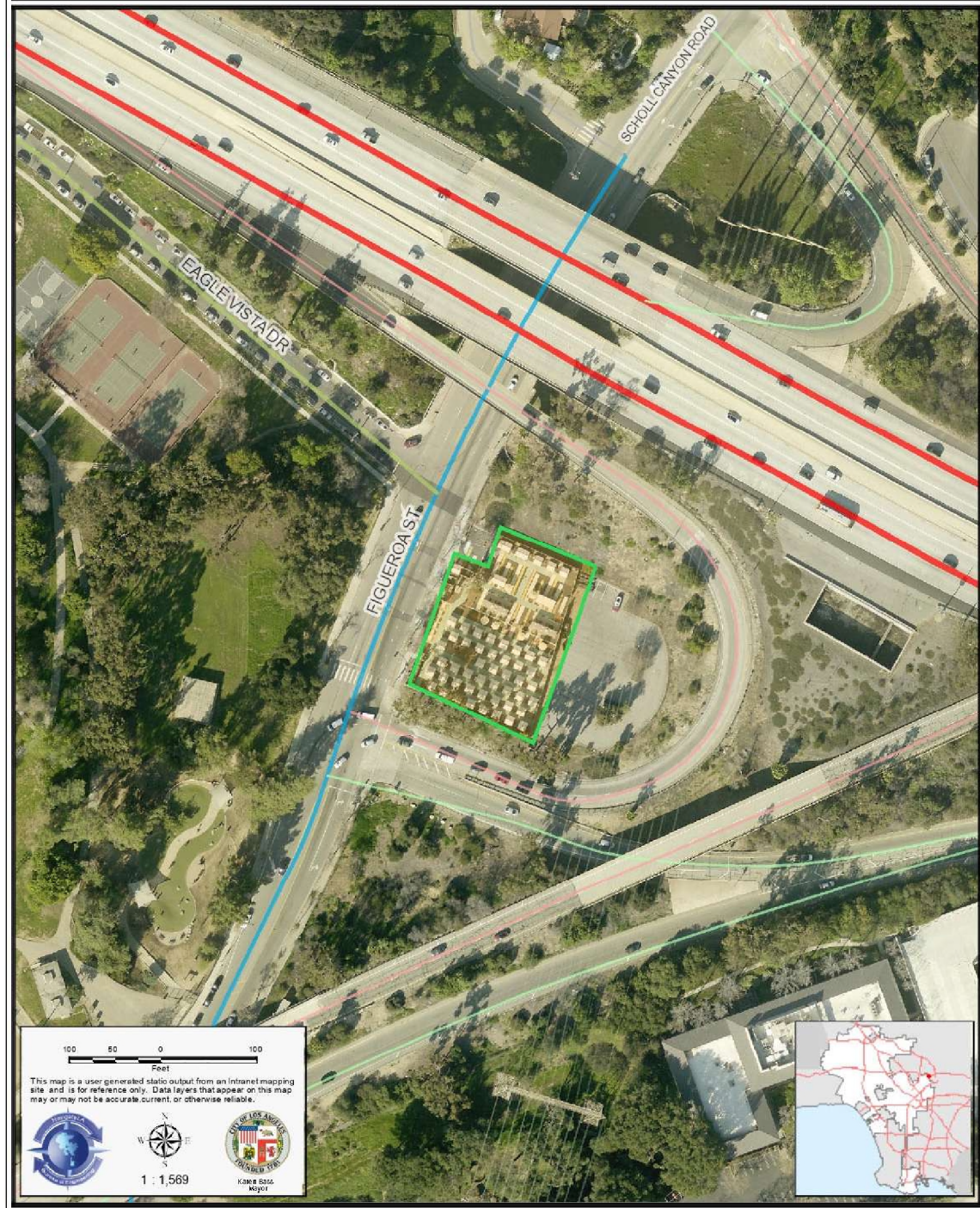
EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (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: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Division	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	DATE

Figure: Project Location



CEQA EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, Continued

A. Operational Governance

The Project concerns a homeless shelter facility serving persons experiencing homelessness in the City. It is operated pursuant to a third-party lease agreement or similar agreement awarded to a third-party service provider solicited by and governed by rules set by the Los Angeles Homeless Services Authority (LAHSA). The facility will 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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 13
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PROJECT TITLE: Bridge Housing at 1533-35 N Schrader Blvd Lease	LOG REFERENCE
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PROJECT LOCATION: 1533-35 N. Schrader Boulevard, Bridge Housing, Los Angeles, CA 90028, in the Hollywood Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 593 E4

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The (CD13) 1533 Schrader Blvd (ABH) / Low Barrier Navigation Center (facility) lease project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) change in service provider from Weingart to Hope the Mission. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council File No. 20-0841-S25). On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (NOE) supporting documents in Council File No. 20-0841-S25; and consistent with, and supported by, the City Council's prior actions approving the development and use of this ABH/low barrier navigation center (see the attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Group	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	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), <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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 13
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PROJECT TITLE: 2301 W. 3rd St. Tiny Home Village (THV) Lease	LOG REFERENCE
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PROJECT LOCATION: 2301 W. 3rd St., Los Angeles, CA 90028, in the Westlake Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1: Project Location. T.G. 634-C2

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The (CD13) 2301 W. 3rd St. THV / Low Barrier Navigation Center (facility) project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) change in service provider from Urban Alchemy to Hope the Mission. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council Clerk File No. 20-0841). On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (NOE) supporting documents in Council File No. 20-0841; 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: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Division	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT N/A
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PROJECT TITLE: Bridge Housing at 2316 Imperial Highway Lease	LOG REFERENCE
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PROJECT LOCATION: 2316 Imperial Highway in the Willowbrook Area of the Los Angeles 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 BENEFICIARIES OF PROJECT:
The (CD15) 2316 E. Imperial Hwy (ABH) / Low Barrier Navigation Center (facility) project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) change in service provider from The Salvation Army to Keeping U Konneted. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council Clerk File No. 20-0841-S28). On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (NOE) supporting documents in Council File No. 20-0841-S28; 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: <i>Pending Prcject approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Division	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	DATE

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

Figure 1: Project Location



CEQA EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, Continued

A. Operational Governance

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

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

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

B. Service-Enriched Operations

The Project will follow LAHSA's operational standards to ensure that it is operated based on housing first principles and is a service-enriched facility. Under Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law), "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery and that centers on providing or connecting homeless people to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services." (Welf. & Inst. Code 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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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.

Bridge Housing at 2316 Imperial Highway Lease

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 approval of the project

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 14
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PROJECT TITLE: CD 14 Civic Center Bridge Housing at 310 N. Main Street Lease	LOG REFERENCE
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PROJECT LOCATION: 310 North Main Street, Space 300 Los Angeles, CA 90012, in the Central City Community Plan Area of the City of Los Angeles, Council District 14 (CD 14). See Figure 1: Project Site and Location. T.G. 634 G3

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The (CD14) 310 N Main St (ABH) / Low Barrier Navigation Center (facility) project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) change in service provider from Weingart to Hope the Mission. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council Clerk File No. 19-1570). On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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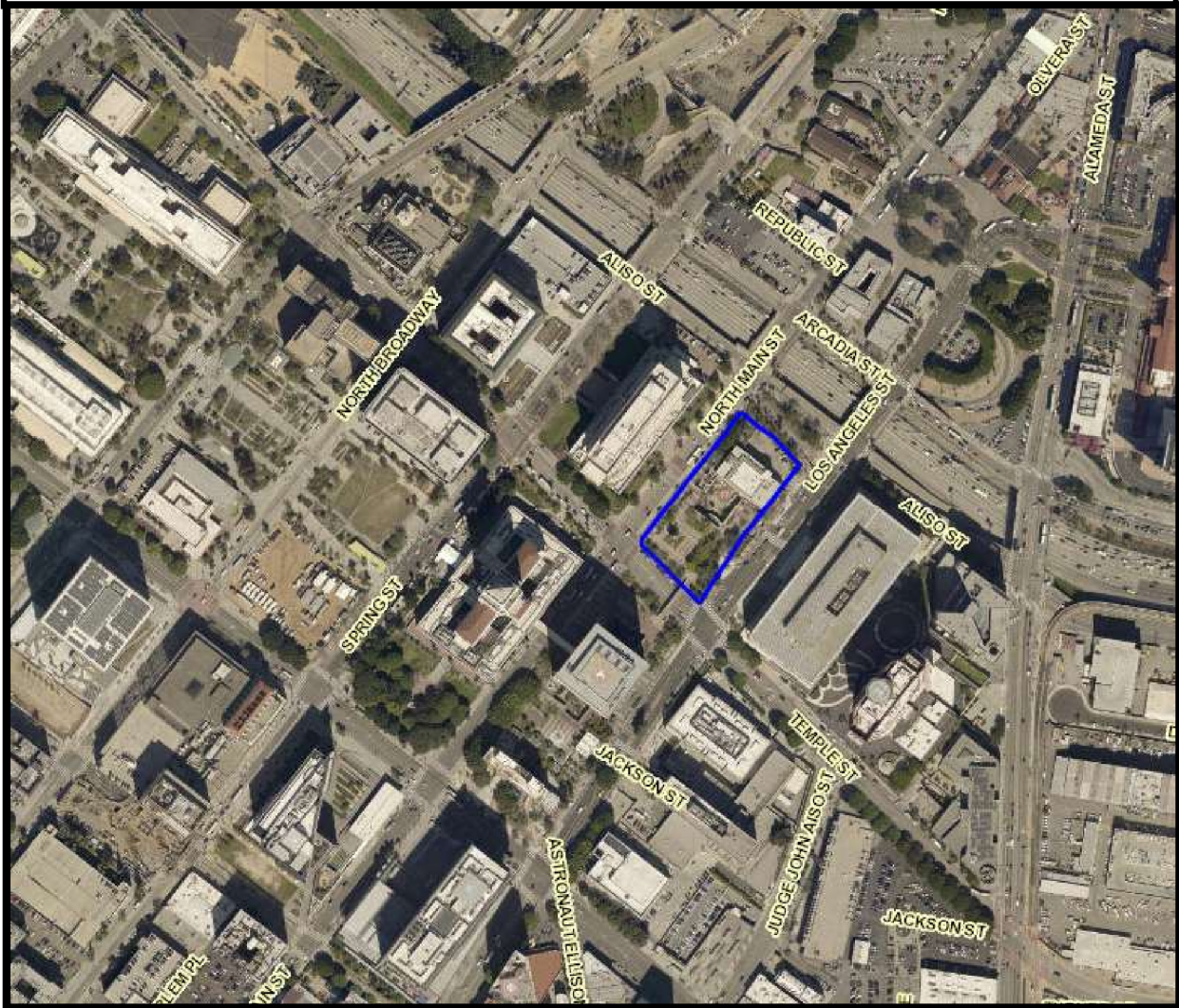
EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (NOE) supporting documents in Council File No. 19-1570; 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: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Division	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	DATE

FIGURE 1 - PROJECT SITE AND 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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 4
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PROJECT TITLE: Bridge Housing at 3248 Riverside Dr. Lease	LOG REFERENCE
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PROJECT LOCATION: 3248 Riverside Drive, in the Hollywood Community Plan Area of the City of Los Angeles (City), Los Angeles County. See Figure 1, Project Location. T.G. 594-C2

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The (CD 4) 3248 Riverside Dr. (ABH) / Low Barrier Navigation Center (facility) project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to one year; and (c) change in service provider from Hope the Mission to Keeping U Konneted. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council File Nos. 19-0126, 20-0841-S35, and 20-0841-S49. On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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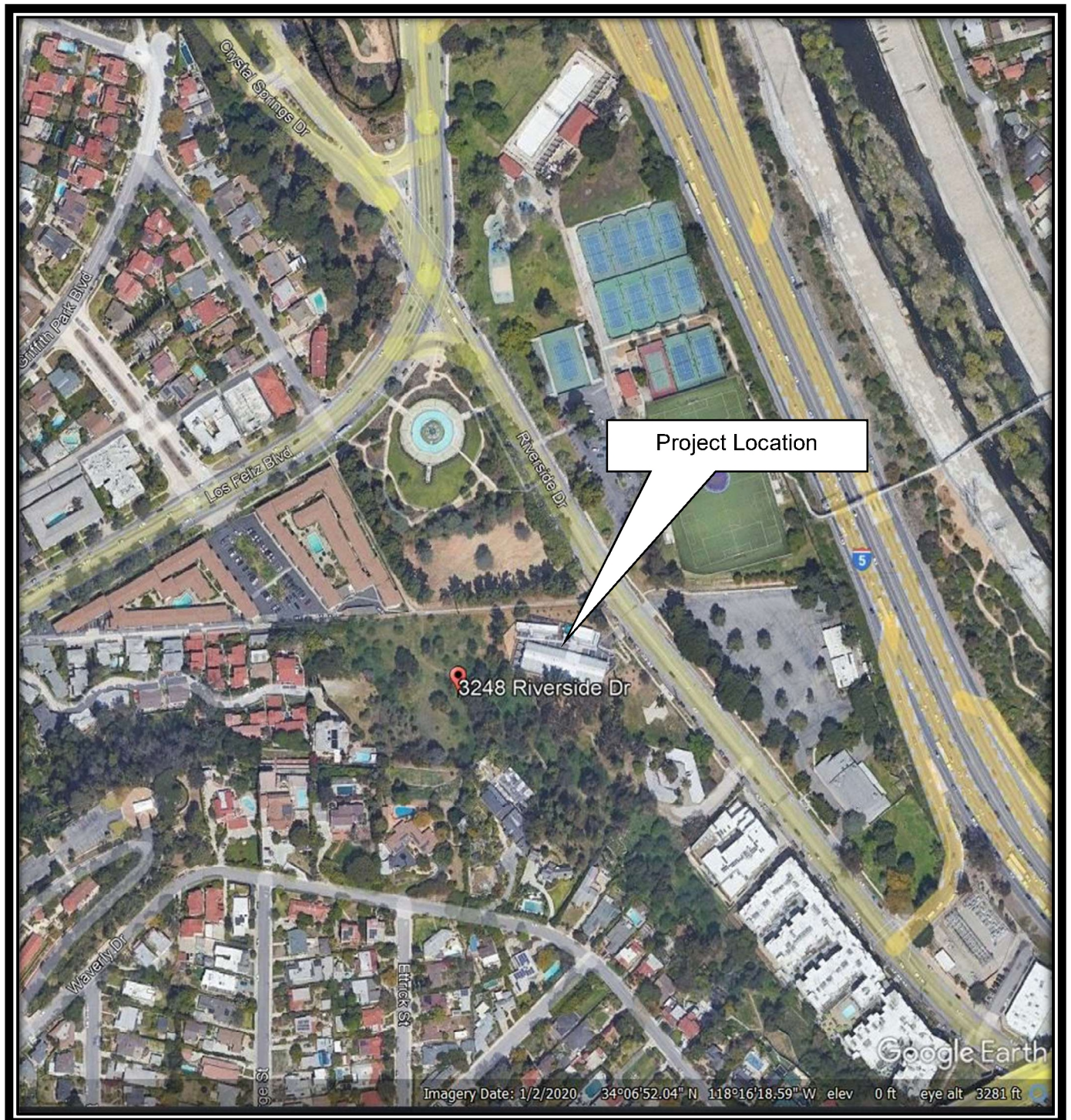
EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (NOE) supporting documents in Council File Nos. 19-0126, 20-0841-S35, and 20-0841-S49; 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: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Division	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	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 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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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 approval of the project

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 15
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PROJECT TITLE: Bridge Housing at 828 N. Eubank Avenue Lease	LOG REFERENCE
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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, (b) extended, or new lease, for approximately up to one year; and (c) change in service provider from US Vets to Holliday's Helping Hands. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council Clerk File No. 18-0651-S2). On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (NOE) supporting documents in Council File No. 18-0651-S2; 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: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Division	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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.

Bridge Housing at 828 N. Eubank Avenue Lease

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 AND ADDRESS: City of Los Angeles c/o Bureau of Engineering (BOE) 1149 S. Broadway, MS 939 Los Angeles, CA 90015	COUNCIL DISTRICT 14
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PROJECT TITLE: CD 14 THV Arroyo Seco Lease	LOG REFERENCE
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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) funding, (b) extended, or new lease, for approximately up to one year; and (c) change in service provider from Hope the Mission to Five Keys. The facility is operated pursuant to a third-party lease agreement or similar agreement with the City pursuant to operational procedures established by the Los Angeles Homeless Services Authority (LAHSA). The facility will operate 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 including, but not limited to, the Project requirements stated in the attached narrative and other project approval documents contained in City Council Clerk File No. 20-0841-S51). On _____, 2025, the City Council determined the Project was exempt from the California Environmental Quality Act (CEQA) and approved the Project.

CONTACT PERSON Maria Martin (maria.martin@lacity.org)	TELEPHONE NUMBER (213) 485-5753
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EXEMPT STATUS: STATUTORY	PUBLIC RESOURCE CODE 21080.27.5	GOVERNMENT CODE 8698.4
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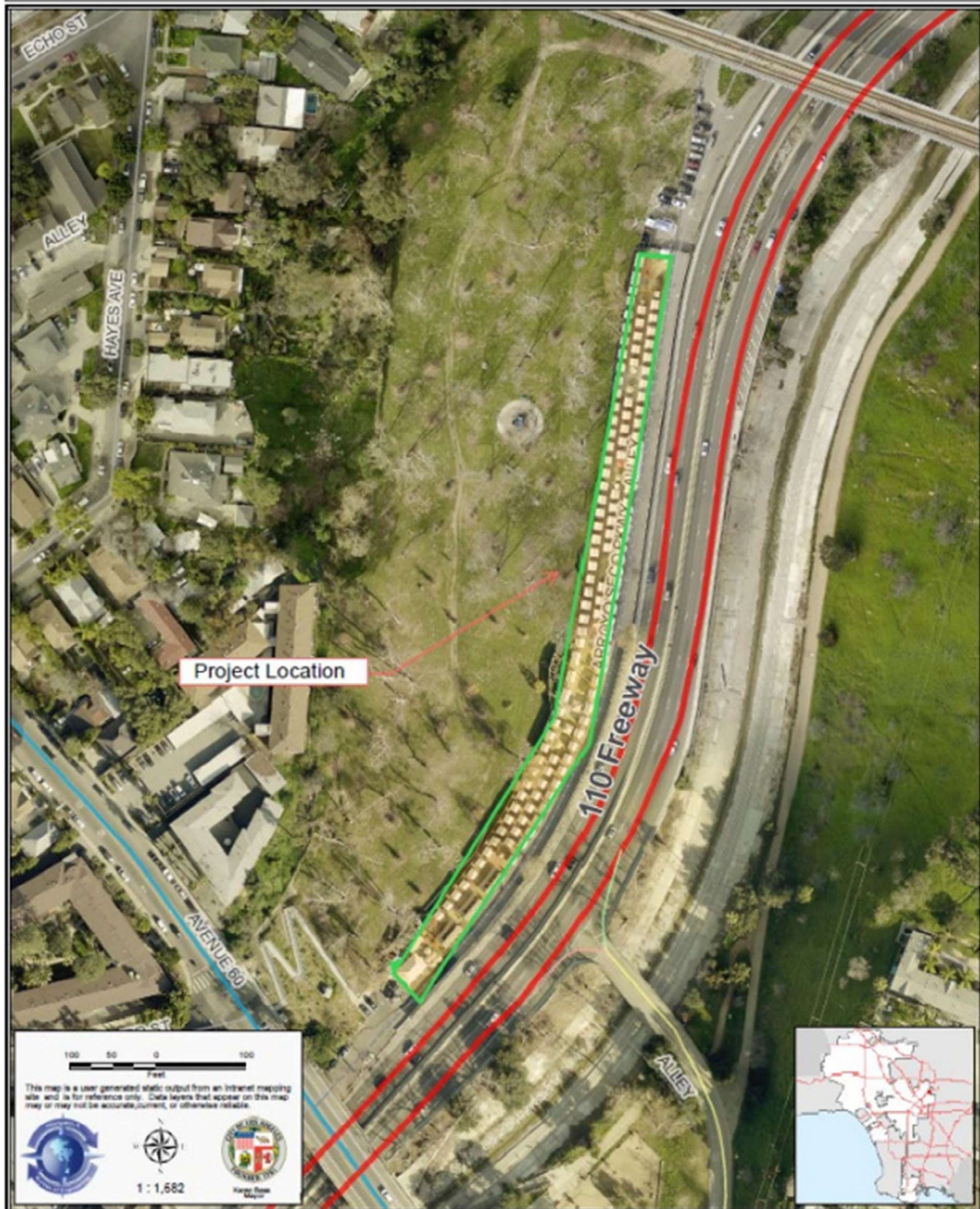
JUSTIFICATION FOR PROJECT EXEMPTION: This Project is statutorily exempt from CEQA under Public Resources Code (PRC) Section 21080.27.5, as a low barrier navigation center; and Government Code Section 8698.4 as a homeless shelter project under a shelter crisis declaration. These determinations are consistent with the Notice of Exemption (NOE) supporting documents in Council File No. 20-0841-S51; 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: <i>Pending Project approval.</i> Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Division	DATE:	
FEE: 75.00	RECEIPT NO.	REC'D BY	DATE

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

Figure 1: Project Location



CEQA EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION, Continued

A. Operational Governance

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

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

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

B. Service-Enriched Operations

The Project will follow LAHSA's operational standards to ensure that it is operated based on housing first principles and is a service-enriched facility. Under Chapter 6.5 of Division 8 of the Welfare and Institutions Code (commonly referred to as the Housing First Law), "Housing First" means the evidence-based model that uses housing as a tool, rather than a reward, for recovery and that centers on providing or connecting homeless people to permanent housing as quickly as possible. Housing First providers offer services as needed and requested on a voluntary basis and that do not make housing contingent on participation in services." (Welf. & Inst. Code 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 above-noted Housing First requirements.

The intention of this shelter is to provide persons experiencing homelessness with some stability, so that they can more easily maintain contact with housing navigation and/or case management services to facilitate safe and supportive housing placement. LAHSA's 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.