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BUREAU OF
ENGINEERING**

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November 18, 2025

The Honorable Marqueece Harris-Dawson, President
Los Angeles City Council
c/o Patrice Y. Lattimore, City Clerk
Office of the City Clerk
Room 360, City Hall

**C.F. 25-1338 – CD 15 A BRIDGE HOME (ABH)/LOW BARRIER NAVIGATION CENTER
LOCATED AT 2316 IMPERIAL HIGHWAY LEASE EXTENSION AND CHANGE IN
SERVICE PROVIDER CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)
NOTICE OF EXEMPTION (NOE)**

Dear President Harris-Dawson and Honorable Members:

The attached environmental documentation is being transmitted for City Council's consideration related to the funding allocation, lease, change in service provider, and continued use for a period of approximately up to three years for the ABH/low barrier navigation center located at 2316 Imperial Highway.

RECOMMENDATIONS

Staff recommends that the Council find that the funding allocation, lease, change in service provider and continued use for an additional period not to exceed three years for the ABH/low barrier navigation center located at 2316 Imperial Highway, 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. Please refer to the attached NOE.



Honorable Marqueece Harris-Dawson, President
November 18, 2025
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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

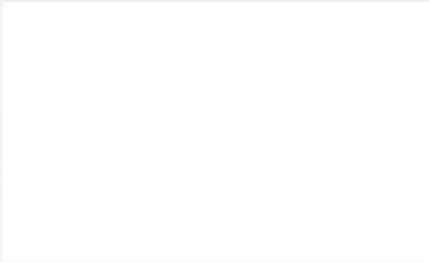
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Box\EXE_2025 City Engineer\Imperial Bridge Housing Transmittal

Attachment

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

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 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 2316 Imperial Highway Lease	LOG REFERENCE C.F. 25-1338
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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 within City of Los Angeles Council District 15 (CD 15). See Figure 1: Project Location. T.G. 704 - H7

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The (CD 15) 2316 Imperial Highway (ABH) / Low Barrier Navigation Center (facility) project (Project) involves (a) funding, (b) extended, or new lease, for approximately up to three years; and (c) change in service provider and service provider agreement. 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 previous project approval document contained in City Council File No. 18-0651-S1 and 20-0841-S33. On June 9, 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.25-093). 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

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. 18-0651-S1 and 20-0841-S33; 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 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/or 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’ service animals are allowed in the ABH.

Storage of possessions. There is storage onsite for program participants.

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

Privacy. Private cubicles will be provided for individuals in the congregate living space.

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.

Bridge Housing at 2316 Imperial Highway Lease

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 Los Angeles Housing Authority, City-owned property located, at 2316 Imperial Highway. The initial development and operation of the facility were found to be categorically exempt on by the City Council on December 11, 2018 (CF No. 18-0651-S1).

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 three years.