

BOARD OF RECREATION
AND PARK COMMISSIONERS

BOARD REPORT

NO. 19-179

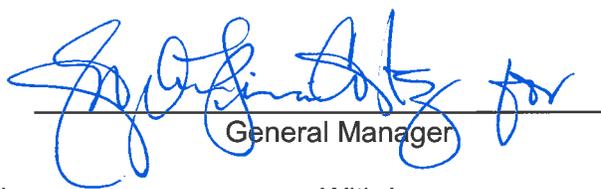
DATE September 4, 2019

C.D. 4

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: GRIFFITH PARK – PROPOSED CD4 RIVERSIDE DRIVE BRIDGE HOUSING PROJECT (W.O. #E1908495) – PROPOSED EMERGENCY USE OF A PORTION OF THE PARK FOR A TEMPORARY HOMELESS SHELTER FACILITY WITH PERSONAL STORAGE FOR THE HOMELESS FOR A PERIOD NOT TO EXCEED THREE (3) YEARS – APPROVAL OF PRELIMINARY PLANS; STATUTORY EXEMPTION FROM THE PROVISIONS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO PUBLIC RESOURCES CODE (PRC) SECTION 21080(b)(4) [SPECIFIC ACTIONS TO MITIGATE EMERGENCIES] REFLECTED IN ARTICLE 18, SECTION 15269(a) OF CALIFORNIA CEQA GUIDELINES AND IN ARTICLE II, SECTION 2.a.3. OF CITY CEQA GUIDELINES.

AP Diaz _____ S. Piña-Cortez _____
H. Fujita _____ C. Santo Domingo DF
V. Israel _____ N. Williams _____



General Manager

Approved X Disapproved _____ Withdrawn _____

RECOMMENDATIONS

1. Find that the emergency use for a temporary period not to exceed three (3) years of operation, of a portion of the Department of Recreation and Parks' (RAP) Griffith Park (Exhibit A) located at 3210 and 3248 Riverside Drive, Los Angeles, California 90027 (Los Angeles County Assessor's Parcel No. 5434-016-900 and 5434-016-901), as a temporary homeless shelter and personal storage site, is consistent with the use of a portion of Griffith Park (Exhibit B) for park purposes;
2. Approve the proposed CD 4 Riverside Drive Bridge Home (W.O. #E1908495) Project (Project), as further described in the Summary of this Report, for a period not to exceed three (3) years of operation;
3. Approve design plans, in the form as attached to this Report and further described in the Summary of this Report, for the Project to be located in a portion of Griffith Park (Exhibit B);
4. Authorize RAP's General Manager or designee to approve technical revisions to the plans as necessary, to complete the construction of the proposed Project, and authorize RAP's General Manager or designee to approve material changes to the design plans when

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necessary to comply with Los Angeles Department of Building and Safety recommendations related to that department's enforcement of the Aquist-Priolo Earthquake Fault Zone Act;

5. Authorize RAP's General Manager or designee to issue a license (e.g. Temporary Right of Entry Permit), as needed, to the Department of Public Works, Bureau of Engineering (BOE); Department of General Services (GSD); or other City Departments to conduct site preparation, utility installation, and construction and other works related to the installation of the proposed Project at Griffith Park;
6. Authorize RAP's General Manager or designee to issue a license to the Department of General Services and/or any designated City Department for the operation, security and maintenance of the proposed Project for a period not to exceed three (3) years of operation;
7. Find that the proposed Project is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA), pursuant to PRC Section 21080(b)(4), as reflected in Article 18, Section 15269(c) of California CEQA Guidelines and in Article II, Section 2.a.3. of City CEQA Guidelines; and,
8. Request the Bureau of Engineering to file a Notice of Exemption (NOE) within five (5) working days of approval with the City and the Los Angeles County Clerk's Office; and RAP.

SUMMARY

During the 2018 State of the City Address, Mayor Garcetti announced A Bridge Home (ABH) — an initiative to erect 15 new temporary emergency housing projects, one in each Council District that would create 1,500 new shelter/bridge housing beds located near people in heavily concentrated encampments. The program has since evolved to include the rehabilitation of existing buildings, payment of leases to private owners, and funding of service provision where there were identified County gaps. In short, ABH is inclusive of all innovative opportunities to quickly bring bridge housing resources to people living on the streets.

Griffith Park is a 4,282-acre park bounded by the 134 Ventura Freeway to the north, the 5 Golden State Freeway to the east, the 101 Hollywood Freeway to the west, and Los Feliz Boulevard to the south (Exhibit A). Its popular features include the Griffith Observatory, Los Angeles Zoo, Greek Theater, Travel Town Transportation Museum, Autry Museum of the American West, Boys and Girls Camp, several golf courses, and Merry-Go-Round. The proposed Project site is located on a partially improved parcel, made up of two lots (3248 West Riverside Drive and 3210 Riverside Drive), across the street from the Griffith Park Recreation Center and the Friendship Auditorium.

The proposed Project site is an existing parking lot, measuring approximately 28,500 square-feet with 56 parking spaces. The proposed Project's scope is to construct a temporary homeless shelter (Shelter) to be operated as part of the bridge housing program. The design of the Shelter and its associated amenities include a 10,800 square-foot (sf) membrane structure with

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approximately 100 beds, a 1,080 sf hygiene trailer, a 1,080 sf administration/intake trailer, bin storage area, approximately 1,000 sf of elevated deck with stairs and ramps, a 680 sf outdoor pet area, and general open space that would serve the local homeless community.

The proposed Project is within the Alquist Priolo Fault zone, approximately 300-ft south of the Hollywood Fault zone. The proposed Project will have a 50-foot setback from the southern boundary of the fault zone for the proposed habitable structures at the site.

The shelter will be operated for up to three (3) years and will provide emergency shelter, hygiene, storage, food services and case management to homeless individuals. The purpose of this proposed Project is to provide an emergency shelter for the local homeless community to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing.

Councilmember Ryu and Council District (CD) 4 staff have had numerous discussions with community members and stakeholders. CD4 staff presented the proposed Project to the Los Feliz Neighborhood Council (LFNC) on February 19, 2019, the Los Feliz Improvement Association (LFIA) on January 22, 2019, and have updated the Griffith Park Advisory Board (GPAB) on February 28, 2019, and each month thereafter. On May 2, 2019, Councilmember Ryu visited the Griffith Park Adult Community Club, located on Park property across the street from the proposed Project, and discussed the Project with their membership.

Additionally, CD4 staff has held weekly "small group discussions" with people interested in learning more about this proposed Project. Anyone can sign up for a meeting on Councilmember Ryu's website. Information about these meetings has been disseminated by LFIA, LFNC, CD4 weekly emails, and published in the Los Feliz Ledger. Meetings have been averaging three (3) to ten (10) people in attendance, and have been held on March 5, March 12, March 19, March 26, April 1, April 11, April 26, April 29, May 6, May 15, May 21, June 12 and June 26 of this year (2019).

To date, CD4 has received letters of support from LFIA, LFNC, the Atwater Village Neighborhood Council, and the Friends of Griffith Park. Additionally, the SELAH Homeless Coalition, a group with members from five (5) nearby neighborhood councils, has been very supportive of this proposed Project. Small group discussions and presentations to neighborhood group will continue throughout this process.

RAP staff provided a briefing of the proposed Project to RAP's Facility Repair and Maintenance Commission Task Force (Task Force) on July 17, 2019. The Task Force recommended this proposed Project go forward to the full Board of Recreation and Park Commissioners (Board) for consideration.

The City Engineer's estimate for the project is approximately Four Million, Six Hundred Forty-Seven Thousand Dollars (\$4,647,000). This proposed Project will be fully funded through the A Bridge Home Program.

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It should be noted that on March 20, 2019, the Board approved a similar bridge housing project on a portion of Lafayette Park in Westlake (Report No. 19-062). The area occupied by that particular project measures approximately 30,127 square-feet.

TREES AND SHADE

As part of this proposed Project, two (2) trees will be removed to place the membrane structure within the asphalt area. The impacted trees are a small Palm and a 12" Eucalyptus.

ENVIRONMENTAL IMPACT

The proposed Project consists of the new construction of a temporary homeless shelter. This proposed Project is meant to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population (Attachment 2). Public Resources Code (PRC) section 21080(b)(4) provides that the California Environmental Quality Act (CEQA) does not apply to “specific actions necessary to prevent or mitigate an emergency.” PRC section 21060.3 defines *emergency* as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that *emergency* “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.” Moreover, Article 18, Section 15269(c) of CEQA Guidelines clarifies that a project to prevent a future emergency – such as this Project, which is designed to mitigate the impacts caused by the spike in homelessness — need not be sudden or unexpected to qualify as statutorily exempt from CEQA compliance. Article II, Section 2.a.3. of City CEQA Guidelines also clarify that that projects necessary to prevent or mitigate emergencies are exempt from the requirements of CEQA. As such, RAP staff recommends that the Board determine that the proposed Project is statutorily exempt from the provisions of CEQA pursuant to PRC Section 21080(b)(4), as reflected in Article 18, Section 15269(c) of California CEQA Guidelines and in Article II, Section 2.a.3. of City CEQA Guidelines. A NOE, which is attached to this Report, will be filed with the Los Angeles County Clerk should the Board grant its approval.

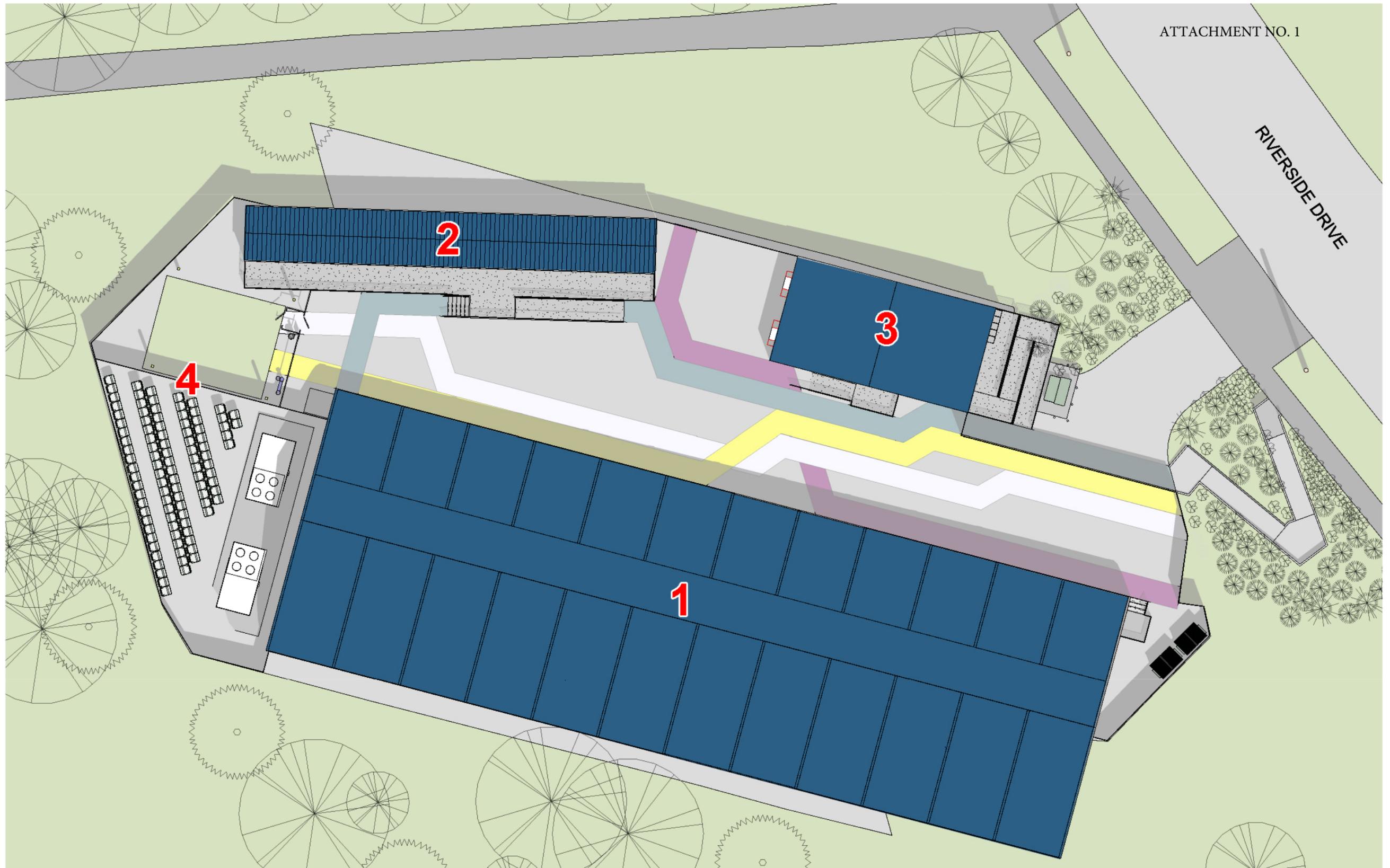
FISCAL IMPACT

This proposed Project will be fully funded through the A Bridge Home Program and a maintenance fund will be established for the duration of services. There is no fiscal impact to the RAP’s general fund.

This Report was prepared by Marina Quiñonez, Architect, BOE Homeless Facilities Division, reviewed by Deborah Weintraub, BOE, Chief Deputy City Engineer; Darryl Ford, Superintendent, Planning, Construction and Maintenance Branch,

LIST OF ATTACHMENTS/EXHIBITS

Attachment 1 - Preliminary Plans
Attachment 2 - Notice of Exemption



1	PROGRAM MATRIX TENT STRUCTURE 60' x 180' TOTAL BEDS 100 CASE MANAGER (3 @ 80 SF) 240 SF COMMON AREA: 2,200 SF LOUNGE SPACE 700 SF TABLE SPACE 1,500 SF	2	HYGIENE STATION 12' x 90' TOILETS (1:15) 7 SHOWERS (1:15) 7 LAVATORIES 9 LAUNDRY FACILITY YES (4 W/4D)	3	ADMINISTRATION 24' x 45' SECURE INTAKE OFFICE 168 SF CASE MANAGER (5 OFFICES) 408 SF STAFF RESTROOMS (2) 104 SF	4	OUTDOOR AREAS PET RELIEF AREA 680 SF STORAGE BIN AREA 900 SF (100 GALLON BINS)
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CD4: RIVERSIDE DRIVE

SITE PLAN: 08-20-19





CD4: RIVERSIDE DRIVE

SITE PLAN: 08-20-19



Eric Garcetti
@MayorOfLA



DAVID RYU
L.A. CITY COUNCIL MEMBER 4



COUNTY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL

CITY CLERK'S USE

LOS ANGELES, CALIFORNIA 90012
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 Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles c/o Bureau of Engineering, 1149 S. Broadway, MS 939, Los Angeles, CA 90015	COUNCIL DISTRICT 04
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PROJECT TITLE: CD 04 Riverside Dr Bridge Housing Facility	LOG REFERENCE C.F. No. 19-0126
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PROJECT LOCATION: 3210 West Riverside Drive, Los Angeles, CA 90027	T.G. 594 C2
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DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT The project is the construction of a temporary homeless shelter on a partially improved parcel made up of two lots that will operate for up to 3 years and will provide emergency shelter, hygiene, storage, food services and case management to homeless individuals. The nature of this project is to serve the local homeless community within the vicinity of the project. The purpose of the project is to provide emergency shelter for the homeless to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. The proposed project is infill development that will consist of a temporary change in use from a surface parking lot and open space to a temporary Bridge Housing emergency homeless shelter. The City will construct the project and lease the property to the County of Los Angeles for operating the facility for up to 3 years. The site property is located at 3210 and 3248 Riverside Drive, Los Angeles, CA 90027, as shown in *Figure 1 – Project Site Location*. The project location is approximately 3.3 acres and is comprised of two (2) lots with two Assessor Parcel Numbers (APN) including 5434-016-900 and 5434-016-901. The project site is approximately 28,500-square feet (sf) of the total parcel area and is proposed to be generally situated on an existing surface parking lot that currently has 56 parking spaces. The City-owned lot is located in the City of Los Angeles Council District 4 in the Hollywood Community Plan Area. The project site is located within the south east portion of Griffith Park, a City of Los Angeles Historical Cultural Monument within the Loz Feliz community just southeast of the intersection of Riverside Drive and Los Feliz Boulevard; on the west side of Riverside Drive. The project site is 2.2 miles southeast of the Griffith Observatory. The project design includes a total of approximately 28,500-sf; up to a 10,800 square-foot (sf) tent structure with approximately 100 beds, an approximately 1,080-sf hygiene trailer, an approximately 1,080-sf administration/intake trailer, a repose garden, bin storage area, waste and recycling area, an approximately 3,500-sf of elevated deck with stairs and ramps, an approximately 680-sf outdoor pet area and general open space that would serve the local homeless community. New utilities including water, electrical and sewer lines will be added and approximately 700-linear-feet of onsite fencing are also included in the project. Up to five trees will be removed. Standard conditions, including a construction management plan incorporated into the project design, will apply. The proposed project is 300-ft south of the Hollywood Fault Zone. The project will have a 50-ft setback from the southern boundary of the fault zone for the proposed habitable structures at the site. The project will not significantly impact environmental resources. Project beneficiaries include the homeless community, the public, and local businesses. (Please see the attached narrative for more details)

CONTACT PERSON: Maria Martin	TELEPHONE NUMBER: 213-485-5753
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EXEMPT STATUS: (Check One)	CITY CEQA GUIDELINES	STATE CEQA GUIDELINES	CA PUBLIC RESOURCES CODE
<input type="checkbox"/> MINISTERIAL	Art. II, Sec. 2.b	Sec. 15268	
<input type="checkbox"/> DECLARED EMERGENCY	Art. II, Sec. 2.a(1)	Sec. 15269(a)	
<input type="checkbox"/> EMERGENCY PROJECT	Art. II, Sec. 2.a(3)	Sec. 15269(c)	
<input type="checkbox"/> GENERAL EXEMPTION	Art. II, Sec. 1	Sec. 15061(b)(3)	
<input type="checkbox"/> CATEGORICAL EXEMPTION*	Art. III, Sec	Sec	
<input checked="" type="checkbox"/> STATUTORY			Sec. 21080(b)(4)

* See Public Resources Code Sec. 21080 and set forth state and city guidelines provisions.

JUSTIFICATION FOR PROJECT EXEMPTION: This project is statutorily exempt under Public Resources Code Section 21080(b)(4) as a specific action necessary to mitigate an emergency as also reflected in CEQA Guideline Section 15269(c) and in the City's CEQA Guidelines as provided above, see attached narrative.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

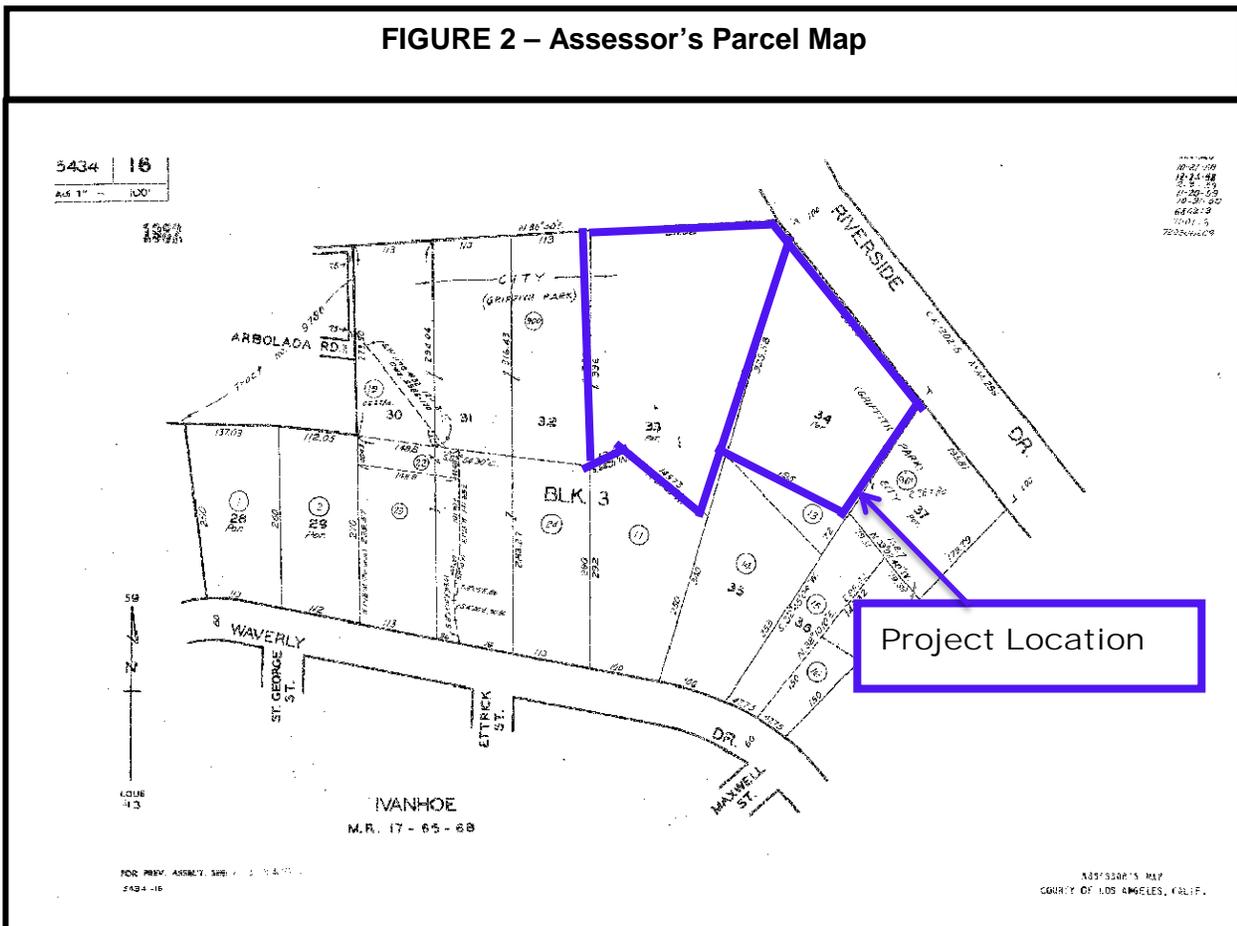
SIGNATURE: Maria Martin	TITLE: Environmental Affairs Officer Environmental Management Group	DATE:
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FEE: \$75.00 _____	RECEIPT NO.	REC'D BY	DATE
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The project design includes a total of approximately 28,500 square feet; the new construction up to a 10,800 square-foot (sf) tent structure with approximately 100 beds, a 1,080-sf hygiene trailer, a 1,080-sf administration/intake trailer, a repose garden, bin storage area, waste and recycling area, 3,500-sf of elevated deck with stairs and ramps, an 680-sf outdoor pet area and general open space that would serve the local homeless community. New utilities including water, electrical and sewer lines will be added and 700-linear-feet of onsite fencing are also included in the project. Up to five trees will be removed. Standard conditions, including a construction management plan incorporated into the project design, will apply.

FIGURE 2 – Assessor’s Parcel Map



The project design shall comply with a construction management plan that includes project design conditions, as necessary, to protect the health, safety, or convenience of affected sensitive receptors, located in the neighborhood that surrounds the project. The construction management plan and appropriate design conditions have been selected from the *City of Los Angeles, Bureau of Engineering, Master Specifications, Division 01, General Requirements, Section 01562, Part 1.1.C*. Selected design conditions are detailed further under applicable resource area analyses (Reference 1). Further, a performance-based approach for developing seismic design features will allow the Department of Building to apply a more direct, non-prescriptive approach to the final design, as necessary. In addition, unless otherwise stated, the proposed project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards including but not limited to:

- Los Angeles Municipal Code
- Bureau of Engineering Standard Plans
- Standard Specifications for Public Works Construction

- Work Area Traffic Control Handbook
- Additions and Amendments to the Standard Specifications for Public Works Construction
- Department of Recreation and Parks Trees Protection Specifications.

II. PROJECT HISTORY

The presence of the unsheltered homeless population and their homeless encampments has increased over the last year by 16%. Because of this, in some areas of the city, access to public places, access routes, and businesses has been hindered, and although there are a growing number of support services to help the homeless find their way off the streets, more services are needed. The latest homeless count in the project area was completed by the Data and Research Unit of the Los Angeles Homeless Services Authority. See *Table 1- Homeless Population Count* for the homeless population count prepared by this Unit on March 8, 2019 for the census tract associated to the proposed project (Tract Number 1882.01) and for various radii from the site (Reference 2, 3).

Project Area Homelessness

The recent homeless count in the project area was completed by the Data and Research Unit of the Los Angeles Homeless Services Authority. See *Table 1- Homeless Population Count* for the homeless population count prepared by this Unit on July 18, 2019 for the associated census tract (Tract Number 1882.01) of the project site and for various radii from the site (Reference 2, 3). The project area homelessness data is consistent with the Citywide data, documenting a significant homeless population presenting a danger to health, life, public safety and undue burden on essential public services as detailed further below.

Table 1 Homeless Population Count				
Homeless Population	Within Census Tract (1882.01)	Within .5 miles	Within 1.0 miles	Within 1.5 miles
Unsheltered	14	25	78	176
Sheltered	0	0	0	0
Total	14	25	78	176

III. STATUTORY EXEMPTION

III. A. THE PROJECT IS EXEMPT FROM CEQA BASED ON STATUTORY EMERGENCY EXEMPTION

III.A.1. Emergency CEQA Statutory Exemption

Public Resources Code section 21080(b)(4) provides that CEQA does not apply, to “specific actions necessary to prevent or mitigate an emergency.” Public Resources Code section 21060.3 defines Emergency as, “a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services.” Section 21060.3 further provides that Emergency, “includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.”

Finally, 14 California Code of Regulations (the CEQA Guidelines) section 15269, “Emergency Projects,” provides examples of emergency projects exempt from the requirements of CEQA, including the following:

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply

(i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or

(ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.

The project is a specific action necessary to prevent or mitigate an emergency – the conditions arising from a sudden and unexpected dramatic rise in the City’s already dangerously large homeless population. The project, therefore is exempt from CEQA environmental review pursuant to Section 21080(b)(4).

III.A.2. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services

Homelessness presents a danger of loss or damage to the health and property of the people of the City and an undue burden on essential public services. Homeless persons constitute approximately .0078 percent of the City’s population (Reference 4).

In 2018, homeless persons constituted 13.5 percent of LAFD’s total patient transports to a hospital, meaning a homeless person is 17 percent more likely to require emergency hospital transportation than the general population (Reference 5). Studies have shown that individuals identified as homeless utilize health care services more frequently than comparable non-homeless individuals of the same age, gender, and low-income status, particularly high-cost services such as ER visits and psychiatric hospitalizations (Reference 6)

Los Angeles County's Chief Executive Officer reported the County spent \$965 million on health, law enforcement, and social services toward individuals experiencing homelessness in fiscal year 2014–2015 (Reference 7). Consistent with that report, a 1998 study in the *New England Journal of Medicine* found that homelessness was associated with substantial excess costs per hospital stay in New York City, with homeless patient staying in the hospital 36 percent longer per admission on average than other patients (Reference 8).

Homelessness also causes significant danger to the health and lives of persons who are homeless. Homeless individuals living in the City are frequent crime victims. In 2018, LAPD reported 2,965 instances where a homeless individual was a victim of a serious crime, including homicide, rape, aggravated assault, theft, and arson (also known as "Part 1 Crimes.") (Reference 9) This compares to 1,762 such crimes in 2017, a 68 percent increase (*Id.*). This dramatic increase in Part 1 Crime statistics may be due to more rigorous LAPD data collection methodologies, but is consistent with the increasing incidence of homelessness documented in June of 2019 detailed below (*Id.*).

Overall, in 2018, the LAPD reported 6,671 instances in total where a homeless individual was a Part 1 Crime victim and/or suspect, among the 31,285 estimated homeless individuals throughout the City (*Id.*). This means that in 2018 there was approximately one Part 1 Crime per every 4.68 homeless individuals in the City. By comparison, for the same year LAPD reported 129,549 total Part 1 Crimes Citywide among an estimated population of 4,054,400 City residents, or approximately one Part 1 crime per every 31.29 City residents. Accordingly, the rate of Part 1 crimes among homeless individuals in 2018 was approximately seven times higher than the rate among the City population as a whole (*Id.*).

On October 4, 2018 and again on February 6, 2019, the Los Angeles County Department of Public Health identified an outbreak of endemic flea-borne typhus in downtown Los Angeles among persons experiencing homelessness. On September 19, 2017, the Los Angeles County Department of Public Health declared a Hepatitis A virus outbreak among persons who are homeless and/or use illicit drugs in the County. Likewise, a January 2018 report from the Los Angeles County Department of Mental Health reported that data from the Los Angeles County Medical Examiner-Corner's showed that a significant number of deaths in the homeless population were caused by treatable conditions such as arteriosclerotic cardiovascular disease, pneumonia, diabetes, cancer, cirrhosis, severe bacterial infections and other conditions (Reference 10). These significant adverse health impacts suffered by the homeless in the City and County of Los Angeles are consistent with the impacts identified by a well-established body of expert social science studies that document the significant adverse health and welfare impacts experienced by homeless persons in the United States and in other countries, which the homeless in the City and County experience as well. Some of that research has documented the following impacts upon homeless persons:

Mortality Rates. A study of the mortality rates of sheltered homeless people in New York City between 1987 and 1994 documented that homeless men died at a rate more than twice that of other residents of New York, and that homeless women died at a rate more than 3.7 times greater than other New York residents (Reference 11). A study conducted between 1985 and 1988 in Philadelphia found that the mortality rate among homeless persons in Philadelphia was nearly four times greater than for the general population (Reference 12). A review of five years of data between 2000 and 2005 in Glasgow, Scotland found that homelessness is, itself, is an independent risk factor for death, distinct from other specific causes (Reference 13).

Access to Healthcare. A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Reference

14). The report found 73 percent of the respondents reported at least one unmet health need, including an inability to obtain needed medical or surgical care (32%), prescription medications (36%), mental health care (21%), eyeglasses (41%), and dental care (41%) (Id.).

AIDs Impacts. A study of San Francisco residents diagnosed with AIDS from 1996 through 2006 and reported to the San Francisco Department of Public Health demonstrated that homeless persons with HIV/AIDS have greater morbidity and mortality, more hospitalizations, less use of antiretroviral therapy, and worse medication adherence than HIV infected persons who are stably housed (Reference 15).

Cancer Impacts. A study of 28,000 current and formerly homeless individuals in Boston documented that homeless men saw a significantly higher cancer incident rate than expected compared to the general Massachusetts general population, and that homeless women and men experienced significantly higher cancer mortality rates than the Massachusetts general population (Reference 16).

III.A.3. Unexpected and Sudden Dramatic Surge in Homelessness

A 2017 Rand Corporation study reported the County of Los Angeles as having the highest rate in the United States of unsheltered individuals who experience homelessness (Reference 17). The impacts of homelessness upon the homeless and upon the community, in terms of the danger to or loss of life, property, health and burden on public services is exacerbated in the City due the very size of the City’s homeless population.

Among other responses to homelessness, on April 17, 2018 the Mayor and City Council of the City of Los Angeles declared a Homeless shelter crisis (Reference 18). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a four percent overall decrease in the number of persons experiencing homelessness in LA County (Reference 19).

Table 2 - 2018 Homeless Count Data Summary presents the data revealed by the 2018 Homeless Count concerning the City of Los Angeles, as documented in the 2018 Data Summary at Reference 19.

Table 2 2018 Homeless Count Data Summary		
	Number of Individuals	Change from 2017
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these ongoing efforts and the initial progress shown in 2018, the 2019 Homeless Count, released in June 2019, unexpectedly has documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in Reference 20 *Table 3 - 2019 Homeless Count Data Summary* presents the data revealed by the 2019 Homeless Count concerning the City of Los Angeles, as documented in the 2019 Data Summary as shown in Reference 20:

Table 3 2019 Homeless Count Data Summary		
	Number of Individuals	Change from 2018
Sheltered Homeless	9,079	8% Increase
Unsheltered Homeless	27,221	19% Increase
Total Homeless Persons	36,600	16% Increase

The unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified in 2019, and attendant identified dangers to health, life, property and burden on public resources present an emergency situation as defined by CEQA.

III.A.4. The Project is Exempt from CEQA Because it is Designed to Mitigate an Emergency

Homelessness, as documented above, itself presents a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services, meeting the definition of emergency provided by Public Resources Code section 21060.3. Homeless populations themselves suffer from adverse health impacts greater than the non-homeless population, including greater risk of death. Homeless individuals impose outsized impacts upon and use public safety and public health resources compared to the general population. The project is designed to mitigate all of these dangers.

The 2019 increase in homelessness in the City was both sudden and unexpected, further meeting the CEQA definition of an emergency set forth at Section 21060.3. Prior to June 2019, homelessness had been decreasing following County and City efforts, showing that the June 2019 dramatic increase in homeless persons was both unexpected and sudden. Moreover, CEQA Guideline section 15269(c) clarifies that a project to prevent a future emergency – such as the project which is designed to mitigate the impacts caused by the spike in homelessness -- need not be sudden or unexpected to qualify as statutorily exempt from CEQA compliance.

Finally, the fact that Section 21060.3 defines an emergency to include events beyond natural or geologic emergencies such as riots, accidents, or sabotage, shows that the dramatic increase of the already large Los Angeles-area homeless population is the type of emergency exempt from CEQA environmental review. The dramatic increase in homelessness identified in June 2019 and the attendant significant adverse public health, safety, and welfare impacts that are associated with homelessness would also be exacerbated by delaying the project in order to conduct a CEQA environmental review. The City’s approval of the project to mitigate the

unexpected and dramatic surge in homelessness is the type of emergency situation the legislature intended to fall outside the scope of CEQA review when it adopted Section 21080(b)(4). For these reasons, the project is statutorily exempt from compliance with CEQA as a specific action necessary to mitigate an emergency.

REFERENCES

1. City of Los Angeles, Bureau of Engineering. *Master Specification, General Requirements, Section 01562, Part 1.1.C.*
2. Los Angeles Homeless Services Authority. *Search of Homeless Population Density for Riverside Dr. Bridge Home*, by Eileen Schoetzow July 8, 2019.
3. Los Angeles Homeless Services Authority. Online search of LAHSA statistics for Area, by Eileen Schoetzow, LABOE, July, 2019.
4. (March 26, 2019, Declaration of Los Angeles Fire Department Battalion Chief and Paramedic Douglas Zabalski, paragraph 8; *Greater Los Angeles Homeless Count – Data Summary*, Los Angeles Homeless Services Authority, July 23, 2018.
5. March 26, 2019, Declaration of Los Angeles Fire Department Battalion Chief and Paramedic Douglas Zabalski, paragraph 8.
6. Hunter, Sarah B., Melody Harvey, Brian Briscoe, and Matthew Cefalu, *Evaluation of Housing for Health Permanent Supportive Housing Program*. Santa Monica, CA: RAND Corporation, 2017. https://www.rand.org/pubs/research_reports/RR1694.html, p. 2; Hwang SW, Chambers C, Chiu S, et al. A comprehensive assessment of health care utilization among homeless adults under a system of universal health insurance. *Am J Public Health*. 2013;103 Suppl 2(0 2):S294–S301. doi:10.2105/AJPH.2013.301369).
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