

MOTION BY SUPERVISOR SHEILA KUEHL

March 26, 2019

**Approval of Notice of Intention to Purchase Real Property located at 7621 Canoga Avenue, Canoga Park, for the Proposed Canoga Park Bridge Housing Project, and Related Actions**

On June 26, 2018, the Board of Supervisors (Board) authorized the County of Los Angeles (County) to negotiate and enter into an Option Agreement for Purchase and Sale of Real Property (Option Agreement) with Gelb Enterprises, a California Limited Partnership (Gelb Enterprises). The Option Agreement granted the County an option period of 180 days to complete its due diligence and environmental site reviews for the property located at 7621 Canoga Avenue (Property), as well as to perform the applicable California Environmental Quality Act (CEQA) analysis, to allow the Board to consider acquiring the Property for a proposed Canoga Park Bridge Housing Project (Project), in order to provide interim homeless housing. The County entered into the Option Agreement in January 2019 and has since completed its due diligence; which indicated no substantial concern with the Property. Further, the County has complied with the notice requirements of Government Code section 65402 and is now prepared to proceed with the acquisition of the Property as a part of the Project.

**MOTION**

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As a matter of background, the approximately 28,092 square foot parcel is improved with a one-story building containing approximately 15,960 square feet of office space that was previously leased to the County's Department of Mental Health to provide mental health services to clients in the surrounding vicinity. The County terminated its lease in November 2017 and relocated the Department of Mental Health to another facility. The County, in coordination with the City of Los Angeles (City), the Los Angeles Homeless Services Authority and homeless housing service providers, had identified the Property as a potential location for interim homeless housing.

The County has finalized the Purchase and Sale Agreement (Purchase and Sale Agreement) that includes all the terms and conditions as agreed to by the County and Gelb Enterprises for the purchase of the Property for \$4,390,000, plus approximately \$10,000 in escrow fees. A portion of the acquisition costs will be funded through the City, through a Funding Agreement by which the City would contribute \$4.3 million in funds for the acquisition of the Property, with the requirement that it be operated as a Bridge Housing site within the County's Department of Health Services and the Los Angeles Homeless Services Authority homeless housing system. When this matter returns to the Board for consummation of the acquisition, County staff will have negotiated the Funding Agreement with the City, and will request authority to execute both the Funding Agreement and the Purchase and Sale Agreement.

LA Family Housing (LAFH) is the non-profit homeless housing service provider who has been selected by the County's Department of Health Services and the Los Angeles Homeless Services Authority to operate the Project upon completion of the Property. LAFH's mission is to help people transition out of homelessness and poverty

through a continuum of housing enriched with supportive services. In pursuit of their mission, LAFH plans to enter into a lease agreement and operating agreement with the County's Department of Health Services to operate the Property by providing approximately 55 to 100 beds for homeless individuals, in addition to providing other homeless support services.

On December 6, 2016, the Board declared homelessness an emergency in the County of Los Angeles. The declaration noted that homelessness in the County is pervasive and growing in severity, endangering the lives of tens of thousands of County residents, and threatening the economic stability of the region by burdening the medical and social services safety net infrastructure.

In addition, on October 30, 2018, the Board declared a shelter crisis in unincorporated areas of the County, mirroring Mayor Eric Garcetti's April 17, 2018 shelter crisis declaration for the City. These declarations describe the pressing need to quickly build new housing units at scale to support the homeless and housing insecure.

Section 25353 of the California Government Code authorizes the Board to purchase real property necessary for use of the County for buildings or for other public purposes. Government Code sections 25350 and 6063 require that a notice of the Board's intention to purchase be published once a week for three successive weeks in a newspaper of general circulation in the County, identifying the property to be acquired and the sellers, the purchase price, and the time and place at which the Board will meet to consummate the acquisition.

**I, THEREFORE, MOVE** that the Board of Supervisors:

1. Find that the proposed Project is categorically exempt from CEQA pursuant to State of California (State) CEQA Guidelines sections 15301(a)(d) and (f), 15303(d) and (e) and 15332 and Classes 1(d) and (i) and 3 of the County's Environmental Document Procedures and Guidelines, Appendix G. The Project includes minor alterations and renovations of an existing facility and installation of small new equipment and facilities in a small structure with negligible expansion of use and is an in-fill development project which will not significantly impact traffic, noise, air quality or water quality. Also find that the Project is statutorily exempt from CEQA under section 21080(b)(4) of the Public Resources Code and section 15269(c) of the State CEQA Guidelines which applies to specific actions necessary to prevent or mitigate an emergency. In addition, based on the proposed Project's records, the Project will comply with all applicable regulations, is not located in a sensitive environment, and there are no cumulative impacts, unusual circumstances, damage to scenic highways, listing on hazardous waste site compiled pursuant to Government Code section 65962.5, or indications that it may cause a substantial adverse change in the significance of a historical resource that would make the exemption inapplicable. The actions are also not subject to CEQA pursuant to Government Code section 8698.4(a)(4) because CEQA does not apply to actions taken by the County in the City with respect to the provision of financial assistance to homeless shelters constructed or allowed under that section. Documentation supporting the exemption is included in Attachment 1. Upon your Board's approval of the recommended actions, the Department of Health Services will file a Notice of

Exemption with the County Clerk in accordance with section 21152 of the Public Resources Code.

2. Approve the proposed Canoga Park Bridge Housing Project.
3. Set April 23, 2019 as the date for a Board meeting to receive comment and consummate the proposed acquisition.
4. Approve Notice of Intention to Purchase the Property (Attachment 2) for the purchase price not to exceed \$4,390,000 plus approximately \$10,000 in escrow fees.
5. Instruct the Executive Office-Clerk of the Board of Supervisors to publish the Notice of Intention to Purchase in accordance with section 6063 of the Government Code.

**I FURTHER MOVE**, that at the duly noticed Board Meeting on April 23, 2019, it is recommended that the Board of Supervisors:

1. Order the purchase of the Property to be consummated, in accordance with Government Code section 25350.

S: MR/Approval of Notice of Intention to Purchase Real Property located at 7621 Canoga Avenue

# EXEMPTION DOCUMENTATION CANOGA PARK BRIDGE HOUSING PROJECT 7621 CANOGA AVENUE

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## 1. PROJECT DESCRIPTION (NATURE, PURPOSE, BENEFICIARIES)

### *Existing Uses*

The 28,092-square foot-project site is currently occupied by a 15,960 square foot, one-story, 15-foot 4-inch-tall vacant building that was previously occupied (1992 until January 2018) by a mental health clinic (with about 70 staff members and over 2,000 client visits per month). **Figure 1** shows an aerial view of the project site and area. Surrounding uses include a gas station to the south, commercial (tile and building supply) to the north, auto service across Canoga to the east and the parking lot for a multi-family residential building to the west (with the three-story multi-family building south of its parking lot southwest of the project site).

The mental health clinic operated from 8 am to 6 pm during the week and was generally vacated by staff by 6:30 pm. It provided psychiatric assessment, crisis intervention, medication support services, individual/group therapy, individual/group rehabilitation, peer support groups, vocational rehabilitation, recreational therapy, case management services, and family support services. Occasional after-hours groups of 15 to 17 people met at the facility during evening hours.

### *Proposed Improvements*

The project consists of renovation, upgrade, operation and maintenance activities associated with reuse of the existing mental health clinic building located at 7621 Canoga Avenue. The clinic building would be rehabilitated for use as a homeless shelter for men and women with up to 100 cubicles/beds plus bathrooms (separate for men and women), laundry facilities, recreation room, dining room, conference room, employee lounge and offices.

Interior improvements include new walls/room partitions to create sleeping cubicles, bathrooms (separate for men and women), laundry facilities, recreation room, dining room, conference room, employee lounge and offices. The project includes new plumbing for the men's and women's bathrooms, upgrades to meet ADA requirements and signage (interior and exterior). Exterior signage would not be illuminated.

Exterior improvements would include the new windows in front, painting, and restriping of the parking lot to accommodate 33 cars (reduced from 49 spaces with the previous clinic use). The existing planter on Canoga in front of the parking lot would remain. Potted plants may be added to the exterior areas. New security night lighting could be added to the exterior of the building; such lighting would be shielded so that the light source could not be seen from adjacent residential properties. The parking lot would include a smoking area (that could have a shade structure) and small (3 foot by 3 foot by 3 foot) "hot box" to decontaminate clothing. A fence may be added to fully enclose the parking lot. **Figure 2** shows a conceptual site plan. **Figure 3** shows a conceptual floor plan of the building. The site plan and floor plan could vary as the plan is finalized.

***Construction***

Construction would extend over approximately 6 to 9 months. Construction activities would generate less traffic compared to prior clinic operations and less than would occur with the proposed shelter. Construction activities would include delivery of equipment and other materials (dividing walls, bathroom fixtures, beds, furniture, etc.), interior demolition, construction of partitions, painting and other similar activities necessary to rehabilitate and convert the building to the proposed use.

***Operational Characteristics***

The proposed shelter would be open 24 hours a day (new clients would only be accepted 8 am to 4 pm) accommodating up to 100 people (men and women) and would be staffed in shifts. There would be three typical shifts for shelter employees, with 12 to 15 during the day shift (7 am to 4 pm), 10 to 12 during the evening shift (3 pm to midnight), and 6 during the night shift (11 am to 8 am). Project staffing would include security personnel (2 during the daytime and one at night) located at the building entrance and available in the facility as needed.

Individual residents are anticipated to stay for 6 months or less time as they transition to permanent supportive housing or other housing options. The shelter is intended to provide housing for men and women, but not families or children. The facility would allow people to bring pets, but no specific area has been designated for them.

The project would generate approximately 127 daily weekday vehicle trips, including 12 a.m. peak hour trips and 12 p.m. peak hour trips.

***Discretionary Actions***

The County of Los Angeles would fund purchase of the site from the existing owner and would fund the County of Los Angeles Department of Health Services (DHS) to undertake proposed rehabilitation and ongoing operations. A non-profit organization (yet to be determined) would operate the shelter.

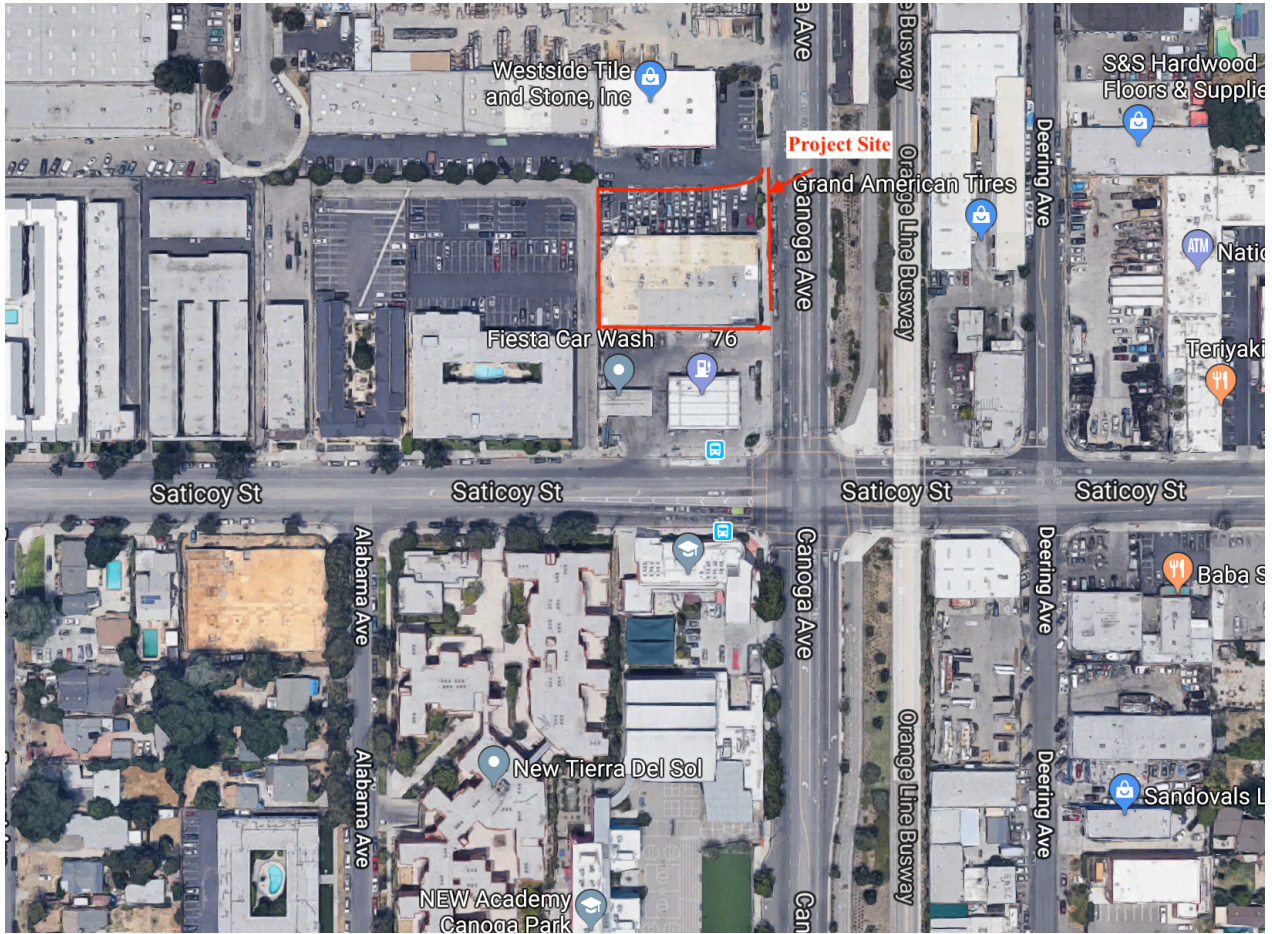


Figure 1: Aerial View of Project Site and Area



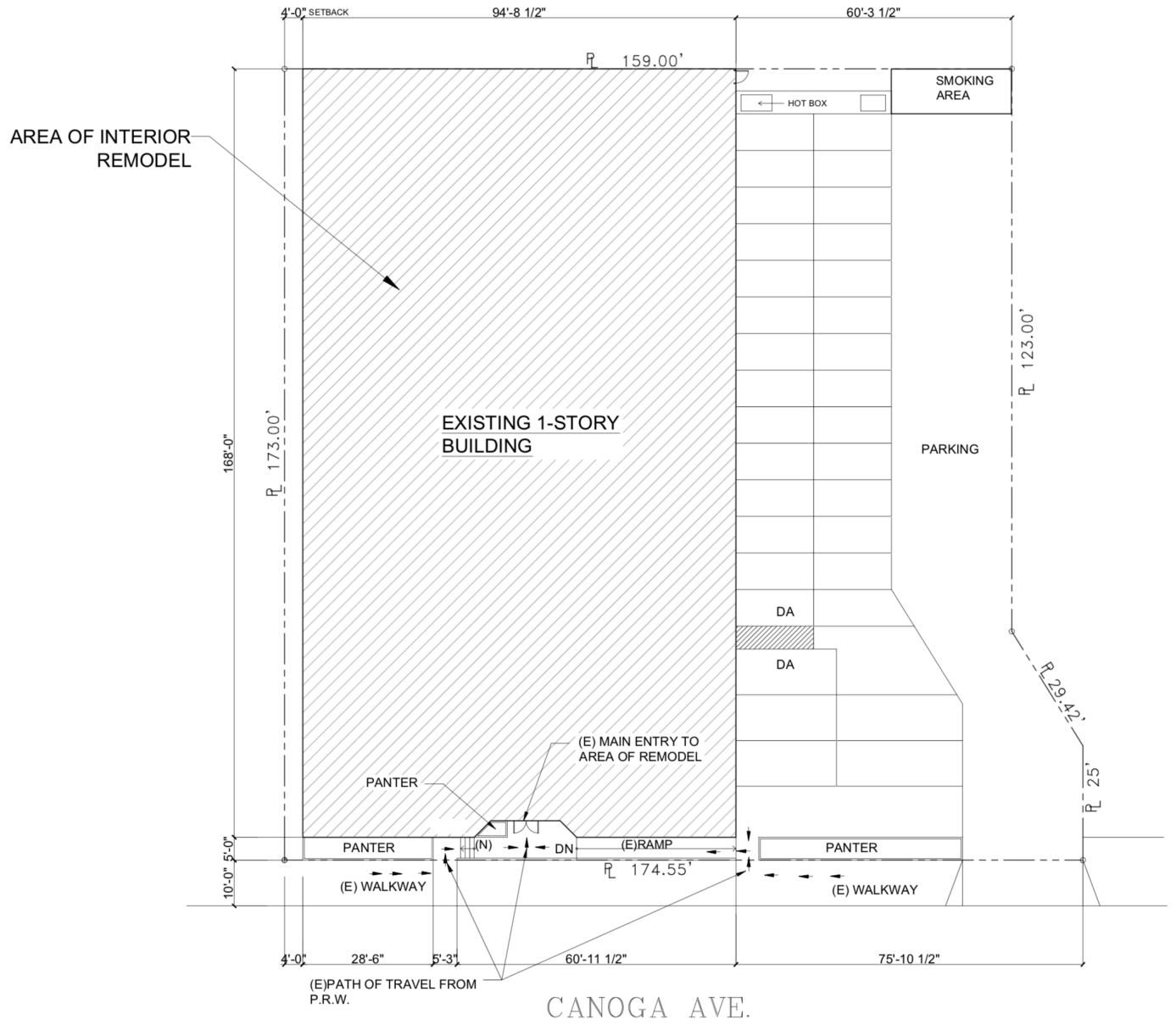


Figure 2: Conceptual Site Plan

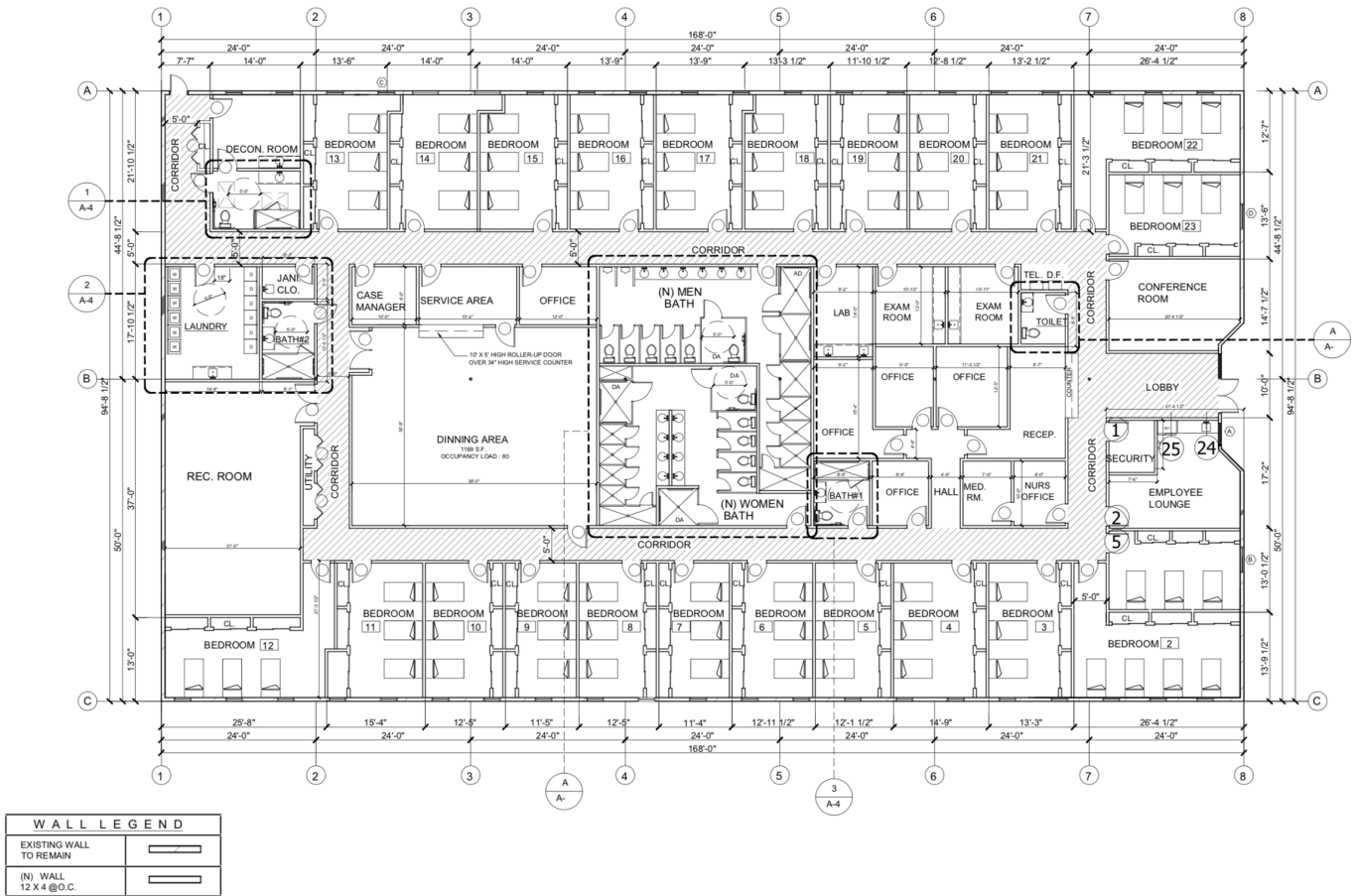


Figure 3: Conceptual Building Floor Plan

## 2. CEQA EXEMPTIONS, AND OVERVIEW OF PROJECT ENVIRONMENTAL ANALYSIS

### Introduction

Government Code Section 8698.4(a)4 exempts homeless shelters in the City of Los Angeles from CEQA.

Public Resources Section 20184, the State CEQA Guidelines includes a list of classes of projects, which the Secretary of Resources found do not have a significant effect on the environment, and which therefore are exempt from the provisions of CEQA.

The County of Los Angeles Environmental Document Procedures and Guidelines reference the State CEQA Guidelines. In accordance with CEQA Guidelines Section 15300.4, the County of Los Angeles, adopted Environmental Document Procedures and Guidelines to specifically identify activities that the County may approve or carry out under the exempt classes. County of Los Angeles Environmental Document Reporting Procedures and Guidelines were adopted November 17, 1987.

Public Resources Code Section 21080(b) identifies activities to which CEQA does not apply. Subsection (4) identifies “specific actions necessary to prevent or mitigate an emergency.” CEQA Guidelines Section 15269 provides guidance on emergency projects exempt from CEQA.

### **SB 765; Government Code Section 8698.4 (a)4 Homeless Shelter in the City of Los Angeles Exempt from CEQA**

SB 765 applies to homeless shelters in the City of Los Angeles. It provides that CEQA does not apply to actions taken by a state agency or a city, county, or city and county, 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, or to provide financial assistance to, a homeless shelter constructed or allowed by this section.

### Categorical Exemptions

#### *Existing Facilities Exemption*

CEQA Guidelines Section 15301, identifies the Class 1 Exemption as follows:

#### *15301. Existing Facilities*

*Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.*

*Examples include but are not limited to:*

*(a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances;*

*...*

*(d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood;*

*....*

*(f) Addition of safety or health protection devices for use during construction of or in conjunction with existing structures, facilities, or mechanical equipment, or topographical features including navigational devices;*

...

The County of Los Angeles Environmental Document Reporting Procedures and Guidelines, Appendix G, Categorically Exempt Projects under Class I, mirrors the State Guidelines with a few minor changes:

*(c) Restoration and repair of buildings, structures, equipment and appurtenances required because of accumulated maintenance not performed;*

*(d) Interior and exterior alterations of buildings involving such things as interior partitions, exterior parapets, placement of wall veneer facings, installation of false of drop ceiling, plumbing, and electrical conveyances, and heating and refrigeration systems;*

....

*(j) Maintenance of and minor alterations to existing landscaping and native growth ...*

...

*(l) Replacement or addition of pumps, valves, or other mechanical equipment at existing facilities;*

...

*(s) Repair and maintenance of fences, irrigation systems, docks, signs, etc.*

...

The proposed project includes renovation activities and subsequent building occupancy that falls within those anticipated by the Class I exemption: i.e. repair, maintenance, minor alteration of an existing structure, facilities, mechanical equipment. The project involves interior alterations involving interior partitions, plumbing, and electrical improvements. The project would result in negligible expansion of use, because the proposed use as a shelter with up to 100 beds would result in similar environmental impacts as compared to the mental health clinic that occupied the site until earlier this year.

***New Construction or Conversion of Small Structures Exemption***

CEQA Guidelines Section 15303, identifies the Class 3 Exemption as follows:

*15303. New Construction or Conversion of Small Structures*

*Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include, but are not limited to:*

...

*(e) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.*

...

The Los Angeles County Environmental Document Reporting Procedures and Guidelines, Appendix G, Categorically Exempt Projects under Class 3, mirrors the State CEQA Guidelines, with a few minor changes/additions including:

*(d) Office buildings, community centers, garages, storage sheds, work rooms, and similar structures at existing facilities;*

...

The project involves installation of small new equipment and facilities in a small structure (15,960 square foot former mental health clinic), including new partitions, new bathroom fixtures in the structure.

Minor modifications are proposed to the existing exterior of the structure (including new windows in the front of the building and restriping the parking lot including provision for a smoking area that could include a shade structure).

### ***Infill Exemption***

CEQA Guidelines Section 15332, identifies the Class 32 Exemption as follows:

#### *15332. In-Fill Development Projects*

*Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.*

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*
- (c) The project site has no value as habitat for endangered, rare or threatened species.*
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*
- (e) The site can be adequately served by all required utilities and public services.*

The County of Los Angeles is not subject to City of Los Angeles CEQA Guidelines, but for purposes of this project has determined that the project would be consistent with the following guidance provided by the City of Los Angeles: “Findings/Specialized Requirements: Class 32 Categorical Exemption” (07.23.2018). This guidance indicates that in order to qualify for the Class 32 Exemption, projects should not fall under any of the exceptions identified in the State CEQA Guidelines, and that LADOT must concur that the project would not have a significant traffic impact.

The City of Los Angeles Class 32 Exemption guidance expands upon the State CEQA Guidance. The City of Los Angeles Guidance indicates that, based on their extensive experience in modeling a variety of projects, a project would not have a construction related impact on air quality and air quality modeling is not required if it is less than 80 residential units or less than 75,000 square feet of non-residential use and less than 20,000 cubic yards of soil export.

The project would be consistent with the applicable general plan designation and zoning. The project site is within the City of Los Angeles, is less than 5 acres and is surrounded by urban uses. There is no habitat on the site. The project (interior rehabilitation activities and operation) would not have the potential to significantly impact traffic, noise, air quality or water quality as discussed herein. Typical construction techniques for building rehabilitation would be used that would be required to comply with applicable regulations including Low Impact Development (LID) requirements and the City of Los Angeles Noise Ordinance. The site is located in an urban area well-served by utilities and public services.

See Section 3 below for a detailed discussion of the environmental issues associated with the CEQA Infill Exemption.

### ***State CEQA Guidelines Section 15300.2 Exceptions to the Use of Categorical Exemptions***

CEQA Section 15300.2 identifies the exceptions to exemptions. Categorical Exemptions do not apply where a project:

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply*

*all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*
- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*
- (d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*
- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

None of the exceptions to exemptions would apply. The site is not located in a sensitive environment. The project does not have the potential to result in a considerable contribution to a cumulatively significant impact. There is no potential for the project to result in a significant effect on the environment due to unusual circumstances. The project would not result in damage to scenic resources within a scenic highway. The site is not on a site included on any list compiled pursuant to Section 65962.5 of the Government Code. The existing mental health clinic building was constructed in 1979; it does not represent a unique style or have other characteristics that would make it historically significant. Therefore, the project does not have the potential to cause a substantial change to the significance of an historic resource.

See Section 4 below for a detailed discussion of the exceptions to the use of categorical exemptions.

### **3. DETAILED DISCUSSION OF ENVIRONMENTAL ISSUES CLASS 32 INFILL EXEMPTION (SECTION 15332)**

#### ***Consistency with General Plan and Zoning (Section 15332(a))***

The project site is located within the City of Los Angeles and is designated for Limited Manufacturing use and zoned (Q)MR1-1VL. The County intends to purchase, renovate, operate and maintain the proposed shelter. The County intends to comply with City regulations.

The MR-1 zone allows any use that's allowed in the CM zone. The CM zone allows, "[a]ny use permitted in the C2 Zone, provided that these uses are conducted in full compliance with all of the regulations of the zone, except that these uses may be conducted as wholesale businesses without limitation on the floor area used for storage. Provided further that residential uses shall be permitted but shall be limited to shelters for the homeless, joint living and work quarters, and those uses permitted in the R3 Multiple Residential Zone, which R3 uses shall be in compliance with all the regulations of the R3 Zone, except that front yard setbacks are not required" (emphasis added).

The (Q) condition provides that, "[n]o building located on the site shall exceed one story or 18 feet in height (including parapets). Any structure on the roof (such as air conditioning units, etc.) shall not be visible from nearby single-family residential properties. Furthermore, there shall be no windows or openings in the wall adjacent to the residential properties to the west." (The IVL is a height limit designation, that limits height to 45 feet in M zones; therefore, the Q condition restricts the height limit further than the 1VL designation.)

***City Limits, Site Size (Section 15332(b))***

The 28,092-square-foot site (0.645 acres) is located in the City of Los Angeles and is surrounded by urban uses.

***On-Site Habitat (Section 15332(c))***

The project site is urban in nature and is substantially surrounded by urban uses and has no value as habitat for endangered, rare or threatened species. There are three small ornamental trees (maples) and boxwood shrubs in a small planter in front of the parking lot and a small street tree in the sidewalk directly in front of the parking lot. These trees and shrubs would not be affected by the proposed project. The project site does not provide habitat for protected species other than potential nesting habitat for birds. In general birds are nesting during the period February 1 through August 31. Over 900 species of migratory birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (*Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10*) and Section 3503 of the California Department of Fish and Game Code protects nests of all birds (except English sparrows and European starlings). These regulations ensure protection of nesting birds. The ornamental trees would not be impacted by construction; most construction activities would be internal to the building except for painting and these activities would be no more disruptive than existing street traffic.

***Traffic (Section 15332(d))***

A review of project trip generation and potential traffic impacts of the project was undertaken.<sup>1</sup> The proposed project would generate approximately 127 daily weekday vehicle trips, including 12 a.m. peak hour trips and 12 p.m. peak hour trips. In order to present a conservative analysis, the number of trips analyzed is not a net increase from the mental health clinic use; subtracting existing trips would result in even fewer new trips. The previous 15,960 sq.ft. clinic that operated at the project site, the trip generation for that use is estimated to have been 609 daily vehicle trips, including 59 a.m. peak hour trips and 52 p.m. peak hour trips.

Based on the potential for increased trips to significantly impact local traffic, the LADOT minimum trip generation standards for traffic studies are 25 peak-hour trips or more for focused traffic studies and 43 peak-hour trips or more for full traffic studies. Below these levels potential impacts to local traffic are not anticipated. The County of Los Angeles Department of Public Works (DPW) minimum standard requirement for traffic studies, based on the potential for adverse impact, is 500 or more daily trips. Therefore, a traffic impact study is not required by LADOT or County DPW for this project and significant impacts to traffic would not occur.

Additionally, the project is within a Transit Priority Area (TPA) with multiple transit opportunities in proximity to the site -- including Metro Rail and two high-frequency bus lines that share stops adjacent to the project site meeting the definition for a major transit stop under Public Resources Code Section 21064.3. The State Office of Planning and Research has recently issued guidance with respect to how to evaluate transportation impacts.<sup>2</sup> As indicated in that guidance, CEQA Guideline Section 15064.3 (b)(1), indicates that lead agencies generally should presume that projects (including residential, retail, and office

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<sup>1</sup> Traffic Review 7621 Canoga Avenue, Sylmar, KOA Corporation, March 2019

<sup>2</sup> Office of Planning and research, Technical Advisory, On Evaluating Transportation Impacts in CEQA, December 2018

projects, as well as projects that are a mix of these uses) proposed within 1/2 mile of an existing major transit stop or an existing stop along a high quality transit corridor should be presumed to cause a less than significant impact on transportation. The guidance also provides that adding affordable residential development in infill locations generally improves job-housing match, in turn shortening commutes and reducing vehicle miles travelled (VMT). It is anticipated that project residents and employees would make substantial use of transit. Therefore, the project would not have a significant impact on traffic and transportation.

#### ***Air Quality (Section 15332(d))***

As noted above, the project is consistent with the City of Los Angeles guidance, which, indicates that projects with less than 80 residential units or 75,000 square feet of non-residential area and less than 20,000 cubic yards of soil export are not expected to result in significant construction or operational emissions/air quality impacts. The project does not involve construction of new space, rather, it comprises renovating existing space for a shelter use with daily operations that would be less than those associated with operation of 80 market rate residential units or 75,000 square feet of non-residential use. Construction emissions would be limited to emissions from construction worker vehicles, paints and glues and off-gassing of any carpeting that would be minor. Operational impacts would be associated with minor automobile use (127 trips per day, which would be less than the prior clinic). Therefore, no air quality modeling is necessary, and impacts would be less than significant.

#### ***Noise (Section 15332(d))***

The closest sensitive receptor is the multi-family residential use in the rear of the project (Warner Manor Apartments at 21431 Saticoy Street which is located in an R3 residential zone); the parking area for which is located behind the mental health clinic building. The parking area is about 20 feet from the clinic building. The apartment building's closest corner is located about 30 feet from the corner of the clinic building. There are no windows on the western side of the clinic building and under the proposed project no windows would be added. The parking area for the project is located about 115 feet from the apartment building.

The project would comply with City requirements with respect to noise.

LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. Demolition and construction activities are prohibited on Sundays and all federal holidays. The construction activities associated with the project (interior demolition, painting, potentially including use of power tools) would comply with these LAMC requirements.

LAMC Sections 111.0 through 116.01 regulate noise other than from construction. Noise greater than 75 dBA at 50 feet is prohibited between the hours of 7 a.m. and 10 p.m. within 500 feet of a residential zone unless compliance is technically infeasible. It is unlawful for any person to make loud, unnecessary and unusual noise that disturbs the quiet of any neighborhood.

The project would comply with LAMC Section 41.40 with respect to regulations applicable to construction. Compliance with City regulations (i.e., the Noise Ordinance) requires the applicant to incorporate all feasible noise attenuation measures such as noise mufflers and noise curtains. The construction noise would be temporary, intermittent and typical for construction activity in urban areas such as the site. Therefore, with compliance with existing City regulations construction noise impacts would be less than significant,

City of Los Angeles Building Regulations Ordinance No. 178,048, requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number



of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Upon completion and operation of the project, on-site operational noise would be generated by heating, ventilation, and air conditioning equipment (as at present) as well as project occupants entering and leaving the building (on Canoga Avenue) and smoking in the outdoor smoking area. These sources of noise would not be expected to disturb surrounding uses including the multi-family use to the west.

The operation of on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Compliance with these regulatory requirements would ensure noise impacts resulting from on-site stationary sources would be less than significant.

Project traffic would not occur on residential streets and would not be substantial (127 trips /day; 12 trips during morning and afternoon peak hours) and therefore would not generate a significant increase in noise. Operation of the shelter would result in noise levels less than or similar to those associated with the existing uses in the area.

By complying with all existing regulations governing both construction and operational noise, impacts would be less than significant.

#### ***Water Quality (Section 15332(d))***

Construction activities could include maintenance/operation of construction equipment and handling/storage/disposal of materials that could contribute to pollutant loading in storm water runoff.

The proposed project would comply with all applicable regulations with regard to surface water quality as governed by the LAMC and the Regional Water Quality Control Board (RWQCB). The City Bureau of Engineering construction standards require contractors to include erosion control, spill prevention and control, solid and hazardous waste management, and dust control to reduce the discharge of pollutants from construction areas into the stormwater drainage system.

As outlined in the City's LID ordinance and associated documentation, the project would investigate Treatment Best Management Practices (BMP's) in hierarchical order: Infiltration, Capture and Reuse, and BioFiltration. Conformance to the LID Ordinance and regional regulations and requirements concerning storm water discharge, and implementation of source control and treatment BMPs, the proposed project would reduce discharge of potential pollutants from storm water runoff to the maximum extent practicable. Therefore, the proposed project would not result in a violation of water quality standards or discharge requirements.

The project would be connected to the city's storm water infrastructure and therefore, through this and with compliance with existing regulations, impacts would be less than significant.

#### ***Public Services and Utilities (Section 15332(e))***

The project residents would be within citywide population assumptions and consistent with land use planning for the project area. The project would not include new development reaching any threshold likely to generate significant demand for public services or utilities. Therefore, impacts would be less than significant.

The project would comply with all applicable provisions of the City's Fire and Building Codes, and the LAFD would review final building design to ensure adequate Code compliance. The project would include supplemental fire protection devices, such as fire alarms, fire extinguishers, emergency exits, and any necessary improvements required by the LAFD, would be included in the project design. The project site is served by LAFD Fire Station 72 with headquarters located about 1.13 miles southeast of the project site. The project site is served by the Newton Community Police Station located about 0.87 miles northwest of the project site.

The project would not impact school facilities as all residents would be temporary and families with children would be housed at different facilities. Therefore, a less-than-significant impact relative to school services would occur with the proposed project.

#### **4. INAPPLICABILITY OF EXCEPTIONS TO EXEMPTIONS (SECTION 15300.2)**

As discussed in detail below, the project would not trigger any of the exceptions to exemptions identified in CEQA Section 15300.2 that would make use of a Categorical Exemption inapplicable.

##### ***Location-Sensitive Environment (Section 15300.2(a))***

The project site is not located in an area mapped as having sensitive uses including biological resources (the site is in an urban area zoned for limited manufacturing) or hazardous materials. The site is completely urban.

##### ***Cumulative Impacts (Section 15300.2(b))***

Cumulative projects within 1.5 miles of the project site are identified on **Figure 4** below and listed in **Table 1** below. A radius of 1.5 miles was selected to identify all projects with the potential to result in overlapping impacts. The radius for identifying cumulative projects is typically determined by the potential for overlapping traffic impacts. All cumulative projects are more than 3,400 feet from the project site. There are no cumulative projects in the immediate vicinity of the project. For areas other than traffic there are no cumulative projects with the potential to result in substantial overlapping impacts and therefore there is no potential for the project to result in a cumulatively considerable contribution to a significant impact.

Due to the limited nature of changes at the project site, operational characteristics of the shelter, and distance to the nearest potential cumulative project, the project would not have the potential to create significant cumulative impacts by contributing to impacts of successive projects of the same type in the same place.

The threshold of significance for a cumulatively considerable contribution to a traffic impact is the same as the threshold of significance for a project impact. Since the project does not trigger a traffic study, project trips do not have the potential to result in a significant traffic impact and therefore do not have the potential to result in a considerable contribution to a cumulative traffic impact. The same is true for air quality thresholds of significance; the project does not have the potential to result in a project-specific significant air quality impact and therefore does not have the potential to result in a cumulatively considerable contribution to a significant air quality impact.

The limited changes to the exterior of the building would have minor if any impact on aesthetics, biological resources, hazards/hazardous wastes, hydrology and land use. In addition, residential infill projects within TPAs are not required to analyze aesthetic impacts under CEQA (CEQA Section 21099(d)(1)). Impacts in these issue areas are localized to the site and immediate vicinity (generally within 1,000 feet) and therefore project impacts would not have the potential to combine with impacts of other cumulative projects to significantly impact these issue areas. The closest cumulative project is more than 3,400 feet from the site and there would be no potential for overlapping impacts in these issue areas.

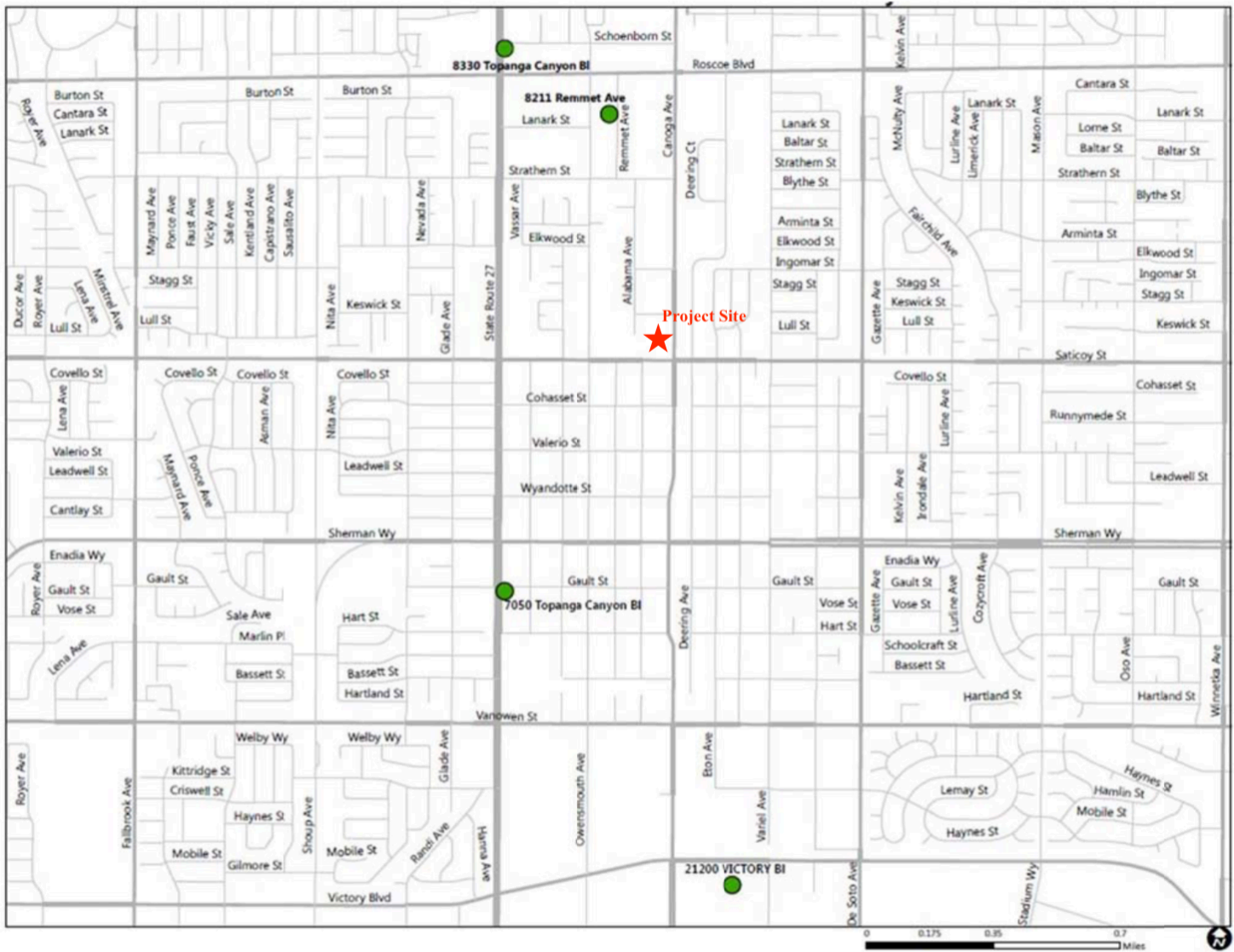


Figure 4 Cumulative Projects Locations

<b>Land Use</b>	<b>Address</b>
621 apartments, 4,685 sf retail	21200 Victory Boulevard
71,000 sf industrial, 3,500 sf other	7050 Topanga Canyon Boulevard
250 student school. 10,250 sf office	8211 Remmet Avenue
3,050 sf retail	8330 Topanga Canyon Boulevard
<b>SOURCE:</b> City of Los Angeles, Department of Transportation (LADOT) December 2018	

The project is not an historic resource and therefore there would be no potential for the project to add to any cumulative impacts with respect to historic resources. The project would not result in ground disturbance and therefore would not have the potential to impact geology/soils, archaeological resources, paleontological resources or human remains. Therefore, project impacts would have no potential to combine with impacts of cumulative projects to create significant impacts on geology/soils or cultural resources.

The project would result in a density and use within the planning assumptions for the City of Los Angeles and its relatively small size would not result in a cumulatively considerable contribution to impacts on public services, recreation and utilities. Anticipated cumulative development in the area is within the planning assumptions of the City of Los Angeles.

Construction noise impacts are limited by distance; in order for construction noise from two or more projects in an urban environment to be audible at a given receptor, these projects must be within 800 feet, which means cumulative projects would have to be separated by less than 1,600 feet in order for impacts to combine. Since the nearest cumulative project is more than 3,400 feet away construction noise impacts would not result in significant cumulative noise impacts.

Operational noise impacts are associated with mobile sources, stationary equipment (e.g. HVAC) and user activity. Noise from stationary equipment is regulated by ordinance (see discussion of noise above) and noise from stationary equipment and on-site activities would be limited by distance similar to construction noise and therefore would not have the potential to result in significant cumulative impacts with cumulative projects.

Mobile source noise is related to vehicle use, it is most concentrated at the site and then disperses to all the different destinations of project users who arrive/depart by vehicle. The project contribution to mobile-source noise levels at the site would be negligible and would be even less with distance from the site and therefore the project's contribution to mobile source noise levels as a result of cumulative projects would be negligible.

***Significant Effect (Section 15300.2(c))***

As explained further in more detail above and below for some environmental issue areas, as a result of limited changes to the existing on-site facilities, and as a result of expected operational characteristics, the project would not have the potential to result in significant environmental impacts with respect to any environmental issue area.

None of the following issue areas would be significantly impacted by the project: aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, tribal cultural resources, or public utilities/service systems issues and therefore would not have the potential to result in a considerable contribution to these impacts (see discussion of cumulative impacts above).

***Scenic Highways and Scenic Resources (Section 15300.2(d))***

The project site is located in an urban area of the San Fernando Valley. It is not visible from any State-designated scenic highway.<sup>3</sup> The closest roadways with any scenic designation from the State (about 2.7 miles to the southwest), is State Route 27 south of US 101 and US 101 west of State Route 27 both of which are identified as “Eligible State Scenic Highways – Not Officially Designated.” The project would not make substantial changes to the appearance of the existing building.

***Hazardous Waste Sites (Section 15300.2(e))***

A review of the Envirostor and Geotracker web sites (see **Figures 5 and 6** below) indicates that the site is not listed on any hazardous materials list identified in California Government Code Section 65962.5.

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<sup>3</sup> Officially designated highways are identified at: [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/) accessed December 12, 2018

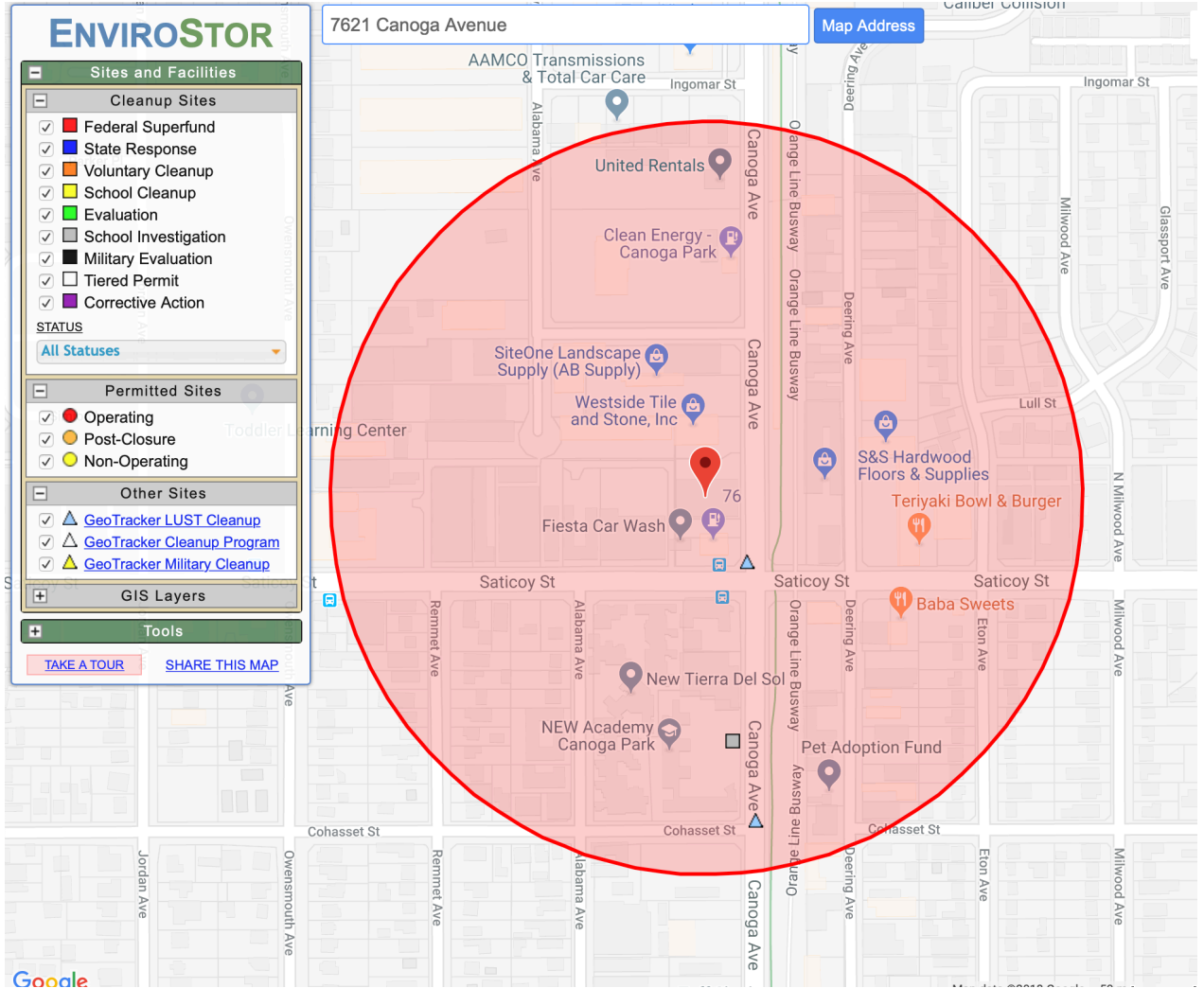


Figure 5 Results of Envirostor Search

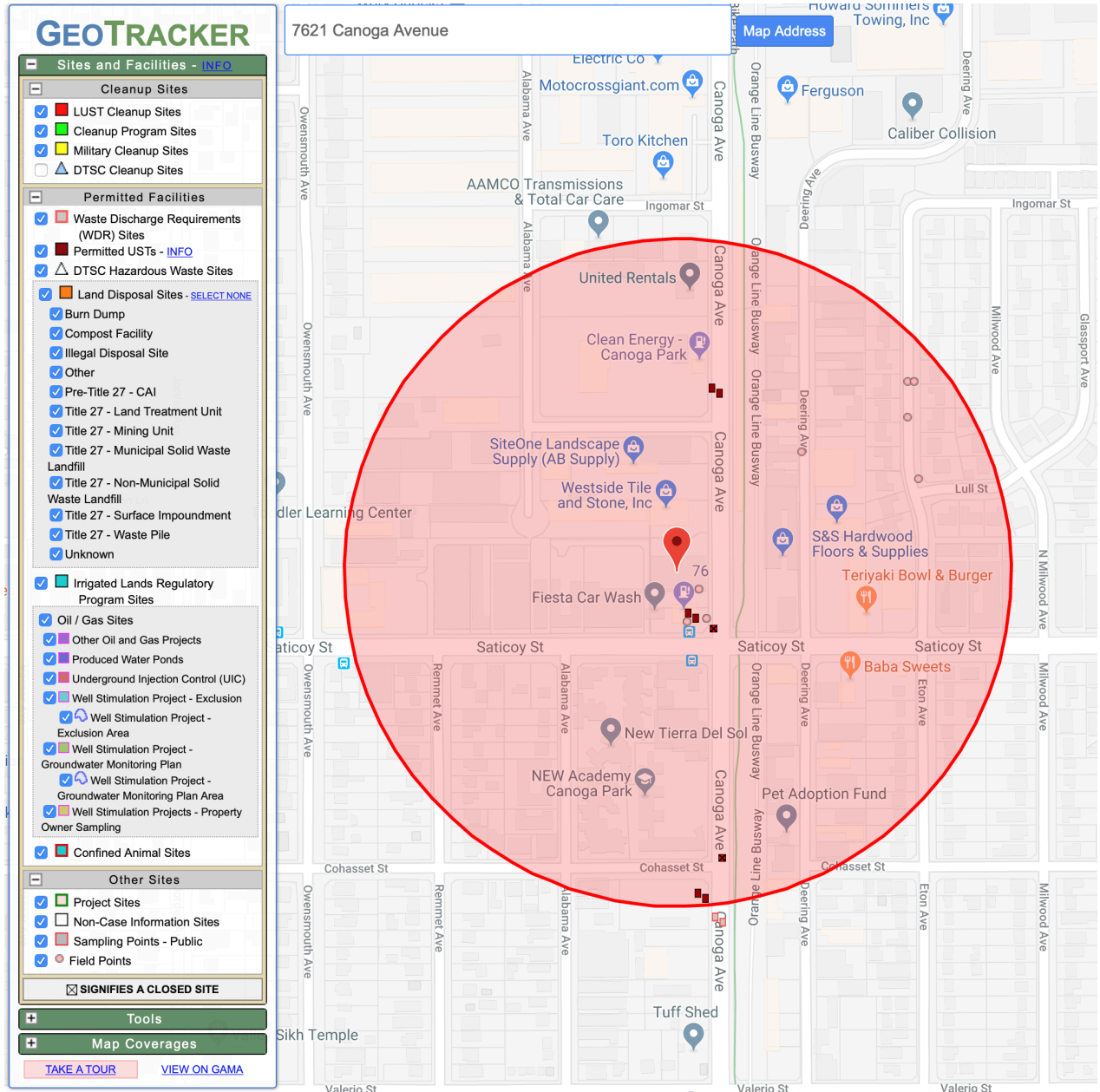


Figure 6 Results of Geotracker Search

**Historical Resources (Section 15300.2(f))**

The mental health clinic located on the project site was constructed in 1979 (almost 40 years old). In general buildings older than 45 years may require historic analysis, since the building is less than 45 years old and does not possess any unique features no historic analysis is necessary. SurveyLA for the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area indicates that there are no historic resources in the immediate vicinity of the project site.

**Emergency Exemption (Statutory)**

CEQA Section 21080(b) indicates:

*(b) This division [CEQA] does not apply to any of the following activities:*

...

*(4) Specific actions necessary to prevent or mitigate an emergency.*

CEQA Guidelines Section 15269 indicates:

*15269. Emergency Projects*

*The following emergency projects are exempt from the requirements of CEQA.*

...

*(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.*

...

Homelessness in the City and County of Los Angeles experienced a large increase from 2016 to 2017. Los Angeles County has more unsheltered homeless individuals than any other U.S. county. The County's total homeless population increased to an estimated 55,048 in 2017 up from 46,874 in 2016 (and about 32,000 in 2010).<sup>4</sup> During the same time period homeless youth (under the age of 24) increased 61% (to about 5,000).<sup>5</sup> In addition:

- LA County has the second-highest number of homeless residents in the United States, second only to New York City.<sup>6</sup>
- Homelessness counts in LA County increased from 38,700 individuals to over 55,000 between 2010 and 2017, an increase of 42%.<sup>7</sup>
- This is tempered only slightly by the 2018 homeless count of 52,765 individuals, the first decrease in four years, of which 39,000 people are living outside.<sup>14</sup>
- Over 700 unsheltered individuals live within a two-mile radius of the proposed Safe Landing site.<sup>8</sup>

In addition to the alarming increase in homeless youth, the LA area is experiencing an equally alarming increase in older homeless people (over the age of 62). This population surged by 22% in 2018 to nearly 5,000 people.<sup>9</sup>

In the City of Los Angeles, the homeless population increased 23% from 2016 to 2017.<sup>10</sup> April 17, 2018 Mayor Eric Garcetti declared a shelter crisis to provide emergency housing for some of the estimated

<sup>4</sup> Los Angeles Homeless Services Authority, May 2017

<sup>5</sup> Ibid

<sup>6</sup> <https://www.dailynews.com/2018/12/17/hud-report-l-a-county-has-second-highest-homeless-population-of-u-s-regions/>

<sup>7</sup> <https://www.lahsa.org/documents?id=2059-2018-greater-los-angeles-homeless-count-presentation.pdf>

<sup>8</sup> Los Angeles County Homeless Emergency, Mark Ghaly, Director, Center for Health and Social Impact, Los Angeles County Chief Executive Office, January 19, 2019. See Attachment B.

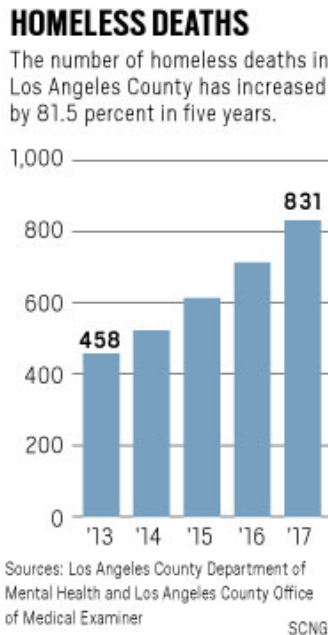
<sup>9</sup> Los Angeles Times, July 19, 2018

<sup>10</sup> Los Angeles Homeless Services Authority, May 2017



25,237 unsheltered homeless people in the City of Los Angeles.<sup>11</sup> October 30, 2018, LA County Board of Supervisors declared a shelter crisis to address homelessness in unincorporated LA County (estimated to be more than 5,000 people).<sup>12</sup>

The number of homeless deaths has increased dramatically in recent years (from 458 in 2013 to 831 in 2017).



The homeless population is particularly susceptible to certain diseases that can spread in unhygienic conditions found when people sleep on the street. Los Angeles County experienced a typhus outbreak in the summer of 2018.<sup>13</sup> Typhus is a disease spread by rats that is often associated with cramped unhygienic conditions. In 2017, Los Angeles County (LAC) experienced an outbreak of hepatitis A virus (HAV) occurring primarily among persons experiencing homelessness or with illicit drug use (IDU).<sup>14</sup> Some diseases that start in homeless populations have the potential to spread to the rest of the population where a disease is particularly contagious.

The emergent morbidity and mortality threat of the opioid epidemic and undertreated complex medical and mental health issues facing the homeless, supported by official declarations of both homelessness and shelter crises in Los Angeles County, are emergencies involving clear and imminent danger, and the proposed Safe Landings project is necessary to prevent and/or mitigate these emergency conditions.<sup>15</sup>

This project would involve repair to facilities (that the County would own) that are necessary to provide service essential to public health, safety and welfare by mitigating the emergency conditions associated with the shelter crisis.

A number of new dedicated funding sources have recently been approved at the state and local levels to address the homeless crisis:

<sup>11</sup> <https://www.lamayor.org/mayor-garcetti-la-city-council-declare-shelter-crisis-mayor-signs-package-ordinances-address-la's>  
<sup>12</sup> <http://ridley-thomas.lacounty.gov/index.php/board-declares-emergency-and-places-homeless-initiative-on-ballot/>  
<sup>13</sup> <http://publichealth.lacounty.gov/eprp/Health%20Alerts/LAHANTyphusupdate101218.pdf>  
<sup>14</sup> <http://publichealth.lacounty.gov/eprp/Health%20Alerts/DPH%20HAN%20Hep%20A%20Outbreak%20091917.pdf>  
<sup>15</sup> Los Angeles County Homeless Emergency, Mark Ghaly, Director, Center for Health and Social Impact, Los Angeles County Chief Executive Office, January 18, 2019. See Attachment B.

- \$2 billion bond in the California "No Place Like Home" initiative;<sup>16</sup>
- \$1.2 billion local (City of Los Angeles) bond measure (Measure HHH) approved in November 2016, generated over a period of ten years;
- County-wide Measure H, approved in March 2017, provides a 0.25 percent sales tax which could generate \$355 million annually for ten years to fund homeless services and prevention.

These funding sources are available for projects (including the proposed project) and resulted in a small decrease in the homeless population between 2017 and 2018 (about 4% which is within the error margin of the count). However, as noted above, these new funds have yet to make a significant dent in the number of homeless people in Los Angeles County.

The project is necessary to provide shelter to people who are already in extreme conditions that expose them to the elements as well as other safety issues associated with being unsheltered. Immediate action is needed to mitigate these conditions.

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<sup>16</sup> On July 1, 2016, Governor Brown signed legislation enacting the No Place Like Home program to dedicate \$2 billion in bond proceeds to invest in the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or who are at risk of chronic homelessness.

**Education**

Sussex University, England, Chemistry, concentration in Environmental Science  
Master's degree, Candidate, Environmental Management, University of San Francisco

**Professional Affiliations**

Association of Environmental Professionals  
Los Angeles Conservancy  
American Planning Association

Ms. Lockwood is an environmental consultant with over 25 years' experience in the preparation of environmental documents pursuant to the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). She has been the Project Manager for major projects and technical task leader on complex projects involving noise, air quality, energy, and hazardous wastes/materials issues. Ms. Lockwood has broad knowledge and understanding of State and local planning regulations and regional planning documents in Southern California. She has participated in the preparation of environmental documentation for over 500 projects.

Ms. Lockwood has experience with a wide variety of projects, issues and communities and using this experience is able to quickly identify and address issues of potential concern before they become major problems. Her technical background allows her to review complex documentation and identify potential analytic flaws. For these reasons, Ms. Lockwood is frequently asked by lead agencies, larger consulting firms, and lawyers to provide detailed review and recommendations concerning CEQA and NEPA documents, including providing overall advice concerning approach and content of environmental documents, critical review of completed documents/analyses as well as providing specific review of more complex projects and/or issues.

In January 2006, Ms. Lockwood started the small environmental consulting firm of Sirius Environmental (Sirius). Sirius (WBE/SBE/VSBE) is an environmental consulting firm that provides CEQA and NEPA related services. Sirius Environmental was formed to focus on project and program management of projects and programs requiring a detailed understanding of CEQA and NEPA and requiring responsive, individualized management. Sirius Environmental provides support to developers, engineers, consulting firms and public agencies in the preparation of clear, accurate technical reports and documents that meet the increasingly demanding needs of communities and their decision makers.

Ms. Lockwood's areas of technical specialty are land use, energy conservation, noise, air quality, greenhouse gas emissions and hazardous materials. She has overseen the preparation of numerous technical analyses for a variety of projects – small and large. She is familiar with land use regulation and prepares policy consistency analyses for projects in complex regulatory environments as well as aesthetic analyses for projects in urban and rural environments.

Ms. Lockwood is an experienced CEQA and NEPA project manager. She has overseen the preparation of comprehensive environmental documents for a variety of different projects, managing complex technical analyses and providing advice to clients regarding effective mitigation strategies. She is familiar with recent case law with respect to environmental documentation. She undertakes public outreach for controversial projects in a number of sensitive communities.

Ms. Lockwood provides QA/QC for a variety of projects including transportation projects (Regional Transportation Plans, Mid-Coast Corridor Transit Project, Orange Line Extension), policy documents (City of Los Angeles CEQA staff training, Updated Thresholds Guide) and plans (Mobility Element, Hollywood Community Plan, Boyle Heights Community Plan).

Ms. Lockwood emphasizes quality. She ensures that information is complete, accurate, concise, and understandable to the reader.

## **Attachment**

- A. Traffic Review – 7621 Canoga Avenue**
- B. Emergency Documentation**



## TECHNICAL MEMORANDUM

Date: January 22, 2018  
To: Wendy Lockwood, Sirius Environmental  
From: Brian Marchetti, AICP  
Subject: Traffic Review – 7621 Canoga Avenue, Los Angeles  
*KOA Project JB81225-4*

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KOA prepared this traffic review, per the City of Los Angeles Department of transportation (LADOT) traffic study guidelines and policies, for the 70-bed transitional housing facility proposed by LA Family Housing. The Project location is 7621 Canoga Avenue, within the San Fernando Valley area of the City of Los Angeles.

### Conclusions

The proposed Project would generate a total of 89 daily weekday vehicle trips, including eight a.m. peak hour trips and eight p.m. peak hour trips. The LADOT minimum trip generation standards for traffic studies are 25 peak-hour trips or more for focused traffic studies and 43 peak-hour trips or more for full traffic studies. The County of Los Angeles Public Works minimum standard requirement for traffic studies is 500 or more daily trips.

A traffic impact study would not be required by LADOT for this project, based on the trip generation estimates provided in this document.

### Project Details

The site facilities are currently non-operational. The previous West Valley Mental health Clinic (MHC), which closed in January 2018, had a total of 70 budgeted staff.

For the proposed facility, employees will total 12 to 15 during the daytime, 10 to 12 during the evening, and six during the overnight period. Program participants will stay until they find permanent housing. Services will be provided on-site that will include mental health, case management, employment, housing location and accessing of government benefits.



## Analysis Methodology

For this traffic review of the proposed project, rates defined by the LADOT traffic study guidelines for Permanent Supportive Housing (PSH) were applied to create a project trip generation estimate.

Per the current Transportation Impact Study Guidelines document, published by LADOT and dated December 2016, special rates are defined for this proposed use and similar uses. The relevant text of the guidelines is as follows:

*“Residential or mixed-use developments that include Affordable Housing Units [as defined in LAMC 12.22-A.25 (b)] are eligible to use the trip generation rates presented in Table 5, which are based on the total number and type of dwelling units reserved as affordable. These trip generation rates are based on vehicle trip count data collected at affordable housing sites in the City of Los Angeles in 2016. These trip generation rates for Affordable Housing units are not subject to any of the aforementioned [trip credit] adjustments in this Section.”*

It is anticipated that auto-ownership rates for shelter populations are much lower than PSH populations, but on-site supportive staffing is generally higher for shelters than PSH, although on-site staffing varies substantially for each (PSH and shelters). The related PSH rates were applied to the proposed project, and credits for transit use, trip reduction measures, and other such credits were omitted from the analysis per the guidelines policies.

## Trip Generation Estimate

Trip LADOT trip generation rates for Permanent Supportive Housing were applied to calculate the trip generation for the proposed Project use.

Table 1 provides the Project trip generation calculations. It is estimated that the proposed Project would generate a total of 89 daily weekday vehicle trips, including eight a.m. peak hour trips and eight p.m. peak hour trips.

**Table 1 – Trip Generation**

ITE Code	Average Vehicle Trip Ends Basis	Intensity	Weekday						
			Daily	AM Peak Hour		PM Peak Hour			
			Total	Total	% In	% Out	Total	% In	% Out
<b>RATES</b>									
520	Units	per resident/unit	1.27	0.12	44%	56%	0.12	59%	41%
<b>TRIPS</b>									
520	Units/Residents	70	89	8	4	5	8	5	3

Applying ITE rates to the previous 15,960 sq.ft. clinic that operated at the project site, the trip generation for that use is estimated to have been 609 daily vehicle trips, including 59 a.m. peak hour trips and 52 p.m. peak hour trips.

The proposed Project would not require a traffic impact study, as the peak-hour trip generation would fall under the 25-trip threshold defined by the City. The County of Los Angeles Public Works minimum standard requirement for traffic studies, for reference, is 500 or more daily trips, which is also not exceeded by the Project.

**Area Transit Service and TPA Definition**

The project vehicle trip generation could be diminished by the available transit trip opportunities of the local area transit network. The general definition of a High Quality Transit Area (HQTAs) according to the Southern California Association of Governments (SCAG) document *Sustainable Communities Strategy (SCS) Background Documentation* is "...a walkable transit village or corridor, consistent with the adopted Regional Transportation Plan/Sustainable Communities Strategy (SCS) and is within one half-mile of a well-served transit stop [or 'Major Transit Stop'] or a transit corridor with 15-minute or less service frequency during peak commute hours".

The specific definitions for HQTAs within that document are as follows:

- Major Transit Stop A site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.



- Transit Priority Area (TPA): An area within a ½-mile of high quality transit; a rail stop or a bus corridor that provides or will provide at least 15-minute frequency service during peak hours.

The project area has multiple lines that meet the HQTAs definition. The presence of Metro Rail within the area and two high-frequency bus lines that share stops adjacent to the project site, satisfy this definition. The high-frequency Orange Line busway line serves the Canoga Avenue corridor, with the nearest stations located as follows in relation to the project site:

- To Roscoe Boulevard station – 0.75 miles
- To Sherman Way station – 0.54 miles

The adjacent Metro Local Bus Line 169 on Saticoy Street provides hourly service with some 30-minute peak service, so the service is not high frequency transit.

The analysis of trip generation in this document is conservative, because it does not include credits for transit use. The propensity for transit use, however, is high based on the availability of access to the Orange Line busway and the calculated trip generation would likely be lowered by this level of transit availability.

### **Definition of Future Baseline/Pre-Project Conditions**

Planned projects were defined by development information held by LADOT Development Review staff. Planned/pending projects within 1.5-miles of the Project site were mapped and the trip generation of each was compiled/computed. This information was compiled to provide general information on area project cumulative traffic impacts.

Table 2 provides the trip generation summary of the cumulative projects compiled for this study. The projects as a whole would generate a total of 7,999 daily vehicle trips, including 704 trips in the a.m. peak hour and 575 trips in the p.m. peak hour. Given the low trip generation for the project, it is not anticipated that the project would contribute a considerable amount of traffic to cumulative impacts.

A map of these project locations is provided in Attachment A.



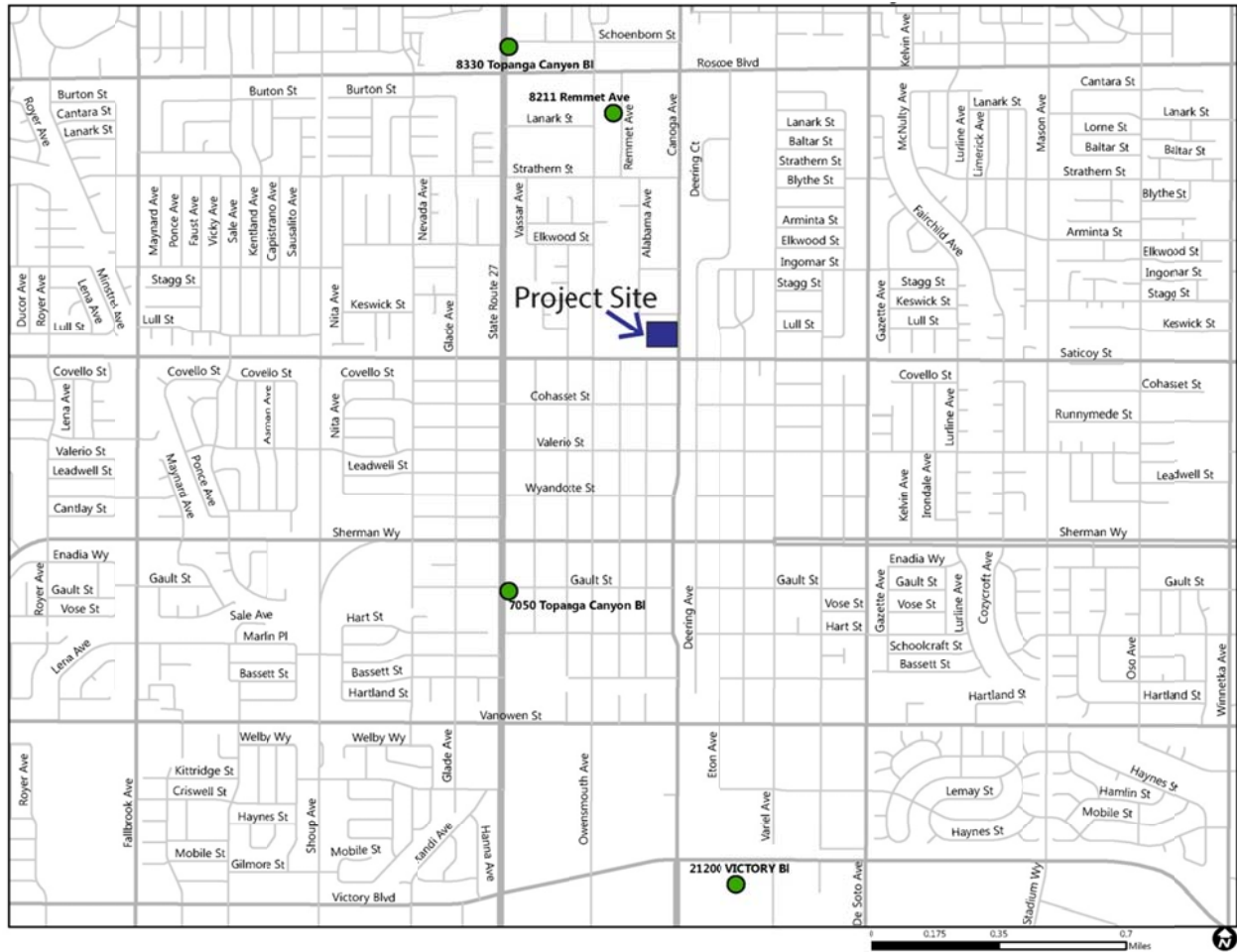


**Table 2 – Cumulative Projects Trip Generation**

FORECAST TRIP GENERATION											
No	Address	Land Use	Intensity	Units	Daily	Weekday AM Total	Weekday AM IN	Weekday AM OUT	Weekday PM Total	Weekday PM IN	Weekday PM OUT
1	21200 Victory Blvd.	Apartments	621	d.u.	4,130	317	63	254	385	250	135
		Retail	4.685	ksf	208	6	4	2	13	6	7
2	7050 Topanga Canyon Blvd.	Other	3.500	ksf	868	79	40	39	56	29	27
		Industrial	71.000	ksf	178	10	6	4	18	9	9
3	8211 Remmet Ave.	School	250	enrollment	527	172	105	67	36	15	21
		Office	10.272	ksf	-96	-14	-12	-2	-13	-3	-10
4	8330 Topanga Canyon Blvd.	Retail	3.050	ksf	2,184	134.0	80.0	54.0	80.0	41.0	39
		<b>TOTAL RELATED PROJECT TRIPS</b>			<b>7,999</b>	<b>704</b>	<b>286</b>	<b>418</b>	<b>575</b>	<b>347</b>	<b>228</b>

Note: All trips for City of Los Angeles from study summaries provided by LADOT, or by use of ITE rates from ITE Trip Generation (10th ed).  
 KSF = 1,000 sq.ft., DU = dwelling units.

**ATTACHMENT A**  
**AREA/CUMULATIVE PROJECT LOCATIONS**





**ATTACHMENT B**  
**REPORT AUTHOR RESUME**

## RESUMES

### BRIAN MARCHETTI, AICP PROJECT MANAGER

#### SENIOR TRANSPORTATION PLANNER

Mr. Marchetti is a Senior Transportation Planner at KOA, managing traffic impact, access and pedestrian circulation, parking, and transit planning studies. He has 23 years of experience in the industry. He has extensive experience with traffic impact analysis and active transportation studies, with coordination on project CEQA documents, and with on-call planning services for local cities. Mr. Marchetti has produced studies for environmental documentation on multiple projects, ranging from large commercial centers, mixed-use development projects, residential tract developments, public utilities projects, public facility and park projects, institutional and school facility traffic impact and pedestrian access projects, to transit and station interface projects. He is a Member of the American Institute of Certified Planners (AICP), #016504.

#### RELEVANT EXPERIENCE

##### **On-Call Engineering & Planning Services, Glendale, CA**

KOA is providing traffic engineering and transportation planning services to the City of Glendale that include review of traffic impact studies, site access and circulation design reviews, pedestrian circulation studies, parking studies, and transportation modeling analyses. Design efforts include review of site access, off-site traffic improvements, on-site parking layouts, on-site delivery truck loading zones, on-site vehicle, delivery truck and pedestrian circulation. Peer reviews of traffic studies are a particular focus of KOA's efforts on this project, and those reviews include reviews of and comparisons to city-wide and other nearby traffic studies, reviews of study scoping documents, review of applied growth, project trip generation, cumulative projects inclusion, level of service calculations accuracy, and site vehicle and pedestrian access issues. KOA provided these services through task orders issued by the City, and worked directly with City engineering staff to supplement their daily efforts.

##### **West Covina On-Call Engineering Services, West Covina, CA**

KOA is a part of the City of West Covina's engineering department preferred traffic engineering consultant list for traffic impact and parking studies. KOA coordinates directly with the City on the project scoping process during the proposal effort and submits the draft product to the City for review and comment prior to the completion of the study. Current and/or recent project include:

- West Covina Self Storage traffic impact study (424 South Lark Ellen Avenue)
- Toyota of West Covina traffic impact study
- 520 South Lark Avenue traffic impact study
- LA Fitness traffic and parking study
- West Covina Lakes Office Complex Parking Study and Design Study
- West Covina Orange Medical Plaza traffic study
- 1700 West, West Covina Parkway traffic study



#### EDUCATION

Bachelor of Science, Urban & Regional Planning, California State Polytechnic University, Pomona

#### REGISTRATIONS

American Institute of Certified Planners, #016504

#### PROFESSIONAL AFFILIATIONS

American Planning Association, Member

Southern California Planning Congress, Vice President of Communications

Los Angeles County Regional Planning History Association



**West Hollywood Avenues Streetscape TIS, West Hollywood, CA**

Project Manager. KOA assisted the design process for this project by providing input on the probable effects of proposed streetscape elements on traffic flow, parking availability, and area valet operations. KOA used traffic volumes from recent traffic studies, the General Plan, and focused collection of new data, to analyze traffic conditions without and with potential project-related changes at major intersection approaches. KOA provided recommendations on general design issues that could negatively affect traffic without commensurate benefits to bicyclists or pedestrians. KOA was present at design charrettes and meetings with the project advisory group. KOA reviewed proposed sidewalk extension and raised median locations related to the project, to determine potential impacts to major driveway access, pedestrian crossing patterns, and turning movement patterns. A thorough traffic engineering assessment was conducted by KOA to illustrate the trade-offs associated with different alternatives on city streets in terms of traffic delay, alternate mode accommodation and safety. The final report included discussion on project options and differences in roadway operations with related roadway reconfigurations.

**San Gabriel 400-420 West Valley Boulevard TIS, San Gabriel, CA**

Principal-In-Charge. KOA prepared a traffic impact study for the proposed mixed-use project at 400-420 West Valley Boulevard, in the City of San Gabriel. KOA produced previous traffic impact study reports for various land use proposals for the same property. The new proposed project was to be larger, with approximately 20,000 more square feet of commercial area, and approximately 70 more residential units. The project site would include north and south access points, with one of those locations providing direct access into a residential neighborhood. A neighborhood impact analysis of three roadway segment locations was included in the analysis.

**El Segundo Smoky Hollow Specific Plan Traffic/Parking Study**

Principal-In-Charge. KOA provided a traffic/circulation and parking analysis for this Specific Plan Update. The goal was to assist in promoting a new development within the plan area, focusing on high-tech, entertainment and business incubator industries and related support services. This area is transitioning away from the traditional light industrial uses that historically served the local aerospace and oil refinery industries. The City's overall goal for the area, however, is to create a unique mixed-use office/industrial district. KOA conducted a traffic analysis of constraints and subsequent impacts of opportunity sites and/or land use changes, and conducted a parking study to identify the general availability on-street parking and its configurations and regulations. The study examined pedestrian walking routes, transit access via an existing City shuttle service that links corporate areas to the downtown area, and linkages to the existing and future bicycle facility network. KOA made recommendations for improvements to these routes and linkages. An analysis of the downgrading of a Secondary Arterial classification to a commercial collector classification was included in the effort.

**LA Street Civic Building EIR / Parker Center Site**

Project Manager. The City of Los Angeles proposed to redevelop the Parker Center site, which was the former location of the Los Angeles Police Department Headquarters Building. The City needed architectural conceptual designs and an environmental impact report prepared for three potential project alternatives, which included adaptive re-use of the existing building, partial demolition and renovation of the existing building, and demolition of the existing building then replacement with a new one-million square-foot building. KOA's scope of work for this project included preparation of the needed traffic study for incorporation into the EIR document. KOA's traffic impact analysis covered an expansive area of downtown Los Angeles for each of the proposed project alternatives.

**East Los Angeles Specific Plan, Los Angeles, CA**

Project Manager. KOA conducted the traffic and parking analysis for the proposed East Los Angeles Specific Plan, encompassing all properties located within one-half mile radii of the four Metro Gold Line stations, and other targeted parcels between the boundaries of Cesar Chavez Avenue, Indiana Avenue, Whittier Boulevard, and Margaret Avenue. The environmental documentation was to be a program document, identifying potential impacts for buildout of the specific plan area, and the overall cumulative impacts of Specific Plan and area development. The traffic study focus on potential impacts within and adjacent to the proposed mixed-use corridors and related land use intensification, calculation of increased trip generation and related reductions for shared uses, pass-by trips, and transit use, and examination of potential parking demand and recommended parking requirements.

# **Los Angeles Homeless Emergency and the Canoga Park Bridge Housing Project**

Mark Ghaly, MD MPH ([mghaly@ceo.lacounty.gov](mailto:mghaly@ceo.lacounty.gov))

## **The Homelessness Emergency in Los Angeles County**

Street-based homelessness is not new in Los Angeles, but its recent growth, and the rising comorbid complexities of undertreated medical, mental health, and substance use disorders facing this population, coupled with its disproportionate reliance on public social services, make homelessness a public health emergency. Homelessness not only threatens the wellbeing of those who are without a home but threatens the economic stability of impacted communities as well.

Los Angeles (LA) County currently has the second-highest number of homeless residents in the United States, second only to New York City.<sup>i</sup> The homeless count in LA County increased by 42% from 38,700 individuals to over 55,000 between 2010 and 2017.<sup>ii</sup> This was lessened only slightly in the 2018 count with 52,765 individuals, of which 39,000 people live outside, representing the first decrease in four years.

In recognition of these dire trends, on December 6, 2016, the LA County Board of Supervisors unanimously voted to declare homelessness an emergency in LA County.<sup>iii</sup> The declaration noted that homelessness in LA County is pervasive and growing in severity, endangering the lives of tens of thousands of LA County residents, and threatening the economic stability of the region by burdening the medical and social services safety net infrastructure.

In addition, on October 30, 2018, the LA County Board of Supervisors declared a shelter crisis in unincorporated areas of the County, mirroring Mayor Eric Garcetti's April 17, 2018 shelter crisis declaration for the City of Los Angeles. These declarations describe the pressing need to quickly build new housing units at scale to support the homeless and housing insecure.

## **How Homelessness Hurts Individuals**

The United Nations recognized the right to “adequate housing” as a fundamental human right almost three decades ago.<sup>iv</sup> It should be no surprise, therefore, that when individuals lack a consistent and secure place to live and sleep, many detrimental and cascading effects follow – chief among these effects is poor health.

More than 80% of homeless people have at least one chronic medical issue, including high blood pressure, heart disease, diabetes, and infectious diseases.<sup>v</sup> Over half of homeless individuals have a mental health condition such as schizophrenia, bipolar disorder, post-traumatic stress disorder and others, and up to an estimated 60% have substance use disorder.<sup>v</sup>

Substance use disproportionately impacts the homeless and is in many cases their primary reason for homelessness. A survey by the United States Conference of Mayors found that 68% of cities reported that substance abuse was the single largest cause of homelessness for single adults.<sup>vi</sup>

And two-thirds of homeless individuals report that drugs and/or alcohol were a major reason why they became homeless in the first place.<sup>vi</sup>

Without treatment, many of these individuals will succumb to their mental illness and addictions, enrolling them into a justice system that all too often criminalizes poverty.

Besides their health, the homeless are forced to constantly worry about their environment and physical safety. In one study of homeless individuals, 32% of women, 27% of men, and 38% of transgendered individuals reported physical or sexual assault in the previous year.<sup>vii</sup> Among homeless women with mental illness, the lifetime risk of violent victimization is 97%.<sup>viii</sup>

Meanwhile, without a permanent address or ready access to a birth certificate and identification, things previously taken for granted suddenly become large barriers when seeking services, benefits, and jobs. Imagine the diabetic patient who needs to keep his insulin refrigerated or the person with sleep apnea who needs to plug in his breathing machine at night. Simply taking a pill twice a day suddenly becomes a logistical challenge. Our interim housing continuum under the Department of Health Services' Housing for Health division has provided a stable, clinically enriched environment where individuals with chronic disease who face homelessness can safely access the care they need and the environment required to manage their health conditions.

With these constant comorbid burdens, stressors, and barriers to assistance, it's no wonder that the average lifespan of a homeless individual is up to 36 fewer years and the mortality rate four to nine times higher than the housed general population.<sup>ix,x</sup> Further, a ten-year study in Boston found that homeless individuals who sleep outside unsheltered have a three-fold increased mortality rate compared to the homeless primarily sleeping in shelters, and a ten-fold increased mortality rate compared to the Massachusetts population.<sup>xi</sup>

According to the LA County Medical Examiner, homeless deaths in the County have continuously risen from 407 in 2012 to 917 in 2018. The majority of these deaths are accidental, with drug overdose being the overwhelmingly most common mechanism. To any health care practitioner, these statistics signal a community emergency that needs immediate attention.

### **How Homelessness Hurts Communities**

Rising numbers of chronically homeless affect our communities in numerous ways, especially straining publicly-funded services. Homeless individuals use the emergency room three times more and are hospitalized five times more than housed individuals.<sup>xii,xiii</sup> 80% of these expensive emergency room visits among the homeless are for an illness that could have been treated with regular primary care for far cheaper.<sup>xiv</sup>

In the process, these frequent visits tie up and overwhelm local 911, Police, Fire, and EMS systems. Once hospitalized, often in County safety net hospitals, the care rendered will go unreimbursed if the individual lacks health insurance, adding to the financial strain on already stretched safety net systems.

According to a 2015 Los Angeles report, at least 15 of the city's agencies engage with the homeless population, some at large cost.<sup>xv</sup> For example, public health departments scrambled to contain last year's hepatitis A outbreak among homeless individuals in California, as this population lacks adequate access to clean water and facilities for hygiene maintenance. Add in

the economic impact on community property values, lost workforce productivity, and the increased burden on local jails, which must provide health services without the benefit of leveraging federal funds available when such services are provided in the community, and the costs continue to multiply.

### **Current Progress Sticking Points**

While the aforementioned challenges are staggering, our efforts within health services have led to some early successes. Studies nationally and locally, including a 2017 RAND Corporation study which looked at the Department of Health Services Housing for Health program, have shown that for homeless individuals who have been frequent users of acute care services within Los Angeles, utilization drops once housed.<sup>xvi</sup> Essentially, housing helps stabilize an individual's social environment and reduces the stressors of getting through the day, allowing more regular and appropriate engagement in life-sustaining choices such as visiting a primary care physician or mental health provider.

### **How the Canoga Park Bridge Housing Project Addresses the Emergency**

The emergent morbidity and mortality threat of the opioid epidemic and undertreated complex medical and mental health issues facing the homeless, supported by official declarations of both homelessness and shelter crises in Los Angeles County, are emergencies involving clear and imminent danger, and the proposed Canoga Park Bridge Housing project is necessary to prevent and/or mitigate these emergencies.

The proposed Canoga Park Bridge Housing project, would deliver immediate interim housing for up to 100 individuals 24 hours a day, 7 days a week (although new clients would generally only be accepted 8 am to 4 pm), free of the restrictions noted above. Staffed around the clock, many with the lived experience of previously being homeless, this site would also provide meals, areas to sleep, and other services and activities. This site would immediately beneficially impact homelessness in the surrounding area, in which 700 unsheltered individuals live within a two-mile radius.

In addition, substance use disorder treatment, including the use of the opioid reversal agent naloxone, has saved lives. Access to these services, however, is still being expanded and few services are co-located with housing, forcing individuals to choose between searching for housing and consistent treatment. The Canoga Park Bridge Housing project would provide on-site substance use disorder treatment and counseling, which would help prevent opioid overdoses and decrease deaths, risks which have a high probability of imminently occurring if this project and others like it are not built quickly.

If we want to meaningfully and sustainably intervene in the emergencies happening to disease-burdened individuals living on the streets, sites like the Canoga Park bridge Housing project, which are open 24/7, with low barriers to entry must be created and created quickly.

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**Dr. Mark Ghaly** is a primary care pediatrician currently serving as the Director of the Los Angeles County's Chief Executive Officer's Office of Health and Social Impact. After completing medical school and his public health degree at Harvard Medical School and Harvard's School for Public Health, Dr.



Ghaly completed his residency at University of California, San Francisco. Following his training, Dr. Ghaly became the medical director for Southeast Health Center in San Francisco where he provided direct patient care and managed the clinic as well as the weekly mobile homeless health care clinic that operated in the Bayview Hunters Point community. In 2011, Dr. Ghaly moved to Los Angeles to become the Los Angeles County Department of Health Service's Deputy Director over Community Health and Integrated Programs. In this role, Dr. Ghaly helped create and build up Housing for Health. Housing for Health has over the past 7 years become an essential direct service provider and programmatic leader for individuals with significant clinical conditions who face and experience homelessness. The Housing for Health team has built an impressive portfolio of services including 1800 interim housing beds including stabilization and recuperative care beds, began the County's first Sobering Center in the Skid Row area of Downtown Los Angeles, opened and directly operates a primary care clinic specializing in serving individuals facing homelessness and those recently housed in permanent supportive housing, created and manages contracts for over 50 multidisciplinary outreach and engagement teams working throughout the County with individuals facing homelessness, and housed in permanent supportive housing over 6000 individuals with complex clinical issues. This experience as both a direct service provider and a leader in homelessness services and housing qualify Dr. Ghaly as an expert in homelessness and the current emergency conditions facing the county of Los Angeles.

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<sup>i</sup> <https://www.dailynews.com/2018/12/17/hud-report-l-a-county-has-second-highest-homeless-population-of-u-s-regions/>

<sup>ii</sup> <https://www.lahsa.org/documents?id=2059-2018-greater-los-angeles-homeless-count-presentation.pdf>

<sup>iii</sup> <http://ridley-thomas.lacounty.gov/index.php/board-declares-emergency-and-places-homeless-initiative-on-ballot/>

<sup>iv</sup> [https://www.ohchr.org/Documents/Publications/FS21\\_rev\\_1\\_Housing\\_en.pdf](https://www.ohchr.org/Documents/Publications/FS21_rev_1_Housing_en.pdf)

<sup>v</sup> <http://www.nhchc.org/wp-content/uploads/2014/06/chronic-disease-combo-hch-conf-es.pdf>

<sup>vi</sup> <https://www.nationalhomeless.org/factsheets/addiction.pdf>

<sup>vii</sup> [https://www.nsvrc.org/sites/default/files/NSAC11\\_Handouts/NSAC11\\_Handout\\_With\\_Statistics.pdf](https://www.nsvrc.org/sites/default/files/NSAC11_Handouts/NSAC11_Handout_With_Statistics.pdf)

<sup>viii</sup> <https://endsexualviolencect.org/resources/get-the-facts/homelessness/>

<sup>ix</sup> <http://www.nhchc.org/wp-content/uploads/2011/10/Premature-Mortality.pdf>

<sup>x</sup> <https://www.cdc.gov/features/homelessness/index.html>

<sup>xi</sup> <https://jamanetwork.com/journals/jamainternalmedicine/article-abstract/2687991>

<sup>xii</sup> <https://www.hcup-us.ahrq.gov/reports/statbriefs/sb229-Homeless-ED-Visits-2014.pdf>

<sup>xiii</sup> <http://www.hpoe.org/Reports-HPOE/2017/housing-role-of-hospitals.pdf>

<sup>xiv</sup> <https://www.greendoors.org/facts/cost.php>

<sup>xv</sup> <http://www.auditor.ca.gov/reports/2017-112/summary.html>

<sup>xvi</sup> [https://www.rand.org/pubs/research\\_reports/RR1694.html](https://www.rand.org/pubs/research_reports/RR1694.html)

**NOTICE OF INTENTION  
TO PURCHASE REAL PROPERTY**

NOTICE IS HEREBY GIVEN that it is the intention of the Board of Supervisors of the County of Los Angeles, State of California to purchase approximately 28,092 square feet of land improved with a 15,960 square foot office building and associated parking (the "Real Property") located at 7621 Canoga Avenue, in the City of Los Angeles, County of Los Angeles, State of California for the sum of Four Million Three Hundred Ninety Thousand and NO/00 Dollars (\$4,390,000) from Gelb Enterprises, a California Limited Partnership (the "Seller"). It is the intent of the County to use the property for interim homeless housing and associated purposes. The Real Property to be acquired is legally described in Exhibit "A" attached to this Notice and incorporated herein by this reference.

NOTICE IS HEREBY GIVEN that the purchase of the Real Property will be consummated by the Board of Supervisors of the County of Los Angeles, State of California, on April 23, 2019, at 9:30 a.m. in the Hearing Room of the Board of Supervisors, Room 381, Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012. No obligation will arise against the County and in favor of the Seller with respect to the purchase of the Real Property described herein until the Board of Supervisors approves the purchase on the named consummation date.

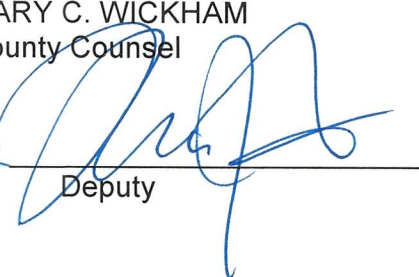


CELIA ZAVALA, Executive Officer  
Board of Supervisors, County of Los Angeles

By   
Deputy

APPROVED AS TO FORM:

MARY C. WICKHAM  
County Counsel

By   
Deputy

**EXHIBIT "A"**  
**PROPERTY LEGAL DESCRIPTION**

APN: 2110-017-060

Real property in the City of Los Angeles, County of Los Angeles, State of California, described as follows:

PARCEL B OF PARCEL MAP L.A. NO. 5518, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 180, PAGES 58 AND 59 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.