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## COASTAL DEVELOPMENT PERMIT APPLICATION NO. 21-01 FINAL STAFF REPORT

*(Under authority of the California Coastal Act, Section 30600(b) of the California Public Resources Code and Chapter 1, Article 2, Section 12.20.2 of the Los Angeles City Municipal Code)*

### I. PROJECT DESCRIPTION

**Project Title:** Ramada Inn Marina Homeless Shelter.  
C.F. No. 20-0941 (Dec. 10, 2020 Final City Council Approval)

**Applicant(s):** City of Los Angeles, Council District 11

**Project Location:**

Council District: 11  
Community: Venice  
District: West Los Angeles

#### A. Project Description:

Coastal Development Permit Number 21-01 includes the change of use from a motel to an interim crisis and bridge housing homeless shelter; and the alteration of the existing two-story 12,220-square foot (sf) Ramada Inn Marina motel. The address is 3130 Washington Blvd., Venice, CA, 902921, located within the Venice Community Plan Area of Council District 11. Assessor's Parcel Number (APN) 4237-027-035, as shown in *Figure 1 - Project Location Map*. (City of Los Angeles, 2020). The Project includes minor tenant improvements to the existing motel building's interior and exterior, to accommodate American with Disabilities Act (ADA) standards; including hearing and vision impaired upgrades, path of travel improvements, and life and safety upgrades. The motel has approximately 33 beds that will provide emergency shelter with supporting spaces, including living room areas, toilets, showers, laundry services, storage, food services, and case management to approximately 33 individuals experiencing homelessness or who are at risk of homelessness and who are impacted by the COVID-19 pandemic.



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 individuals experiencing homelessness to help bridge their transition from living on the streets to finding services and, ultimately, living in transitional and/or permanent housing. Project beneficiaries include the homeless community, the public and local businesses.

## **B. Project Background**

### **1. Existing Conditions – Environmental Setting**

The Project site is located within an urban area on a parcel that is currently developed as the shuttered two-story 12,220-square foot (sf) Ramada Inn Marina motel. The Project site is C2 zoned with a General Commercial land use designation. (City of Los Angeles, 2020) The Project location is on a 17,422 square foot, rectangular-shaped parcel that includes three (3) lots. The Project site is located approximately 1.3 miles from the Pacific Ocean within the single jurisdiction area of the California Coastal Zone. The City of Los Angeles Municipal Code (LAMC) § 12.20.2 applies to projects within the California Coastal Zone.

On December 10, 2020, the Los Angeles City Council (City Council) approval of the Project was final. The City Council determined that it was exempt from the California Environmental Quality Act (CEQA) and filed a Notice of Exemption with the County Registrar-Recorder/Clerk, noting the project is statutorily exempt under the Public Resources Code § 21080(b)(4) as a specific action necessary to prevent or mitigate an emergency as also reflected in CEQA Guideline § 15269(c); Health and Safety Code § 50675.1.2 (AB 83); applicable to any project funded from the 2020 Budget Act or any related acts, including the Coronavirus Relief Fund by the federal (Coronavirus Aid, Relief, and Economic Security) CARES Act, with funds disbursed in accordance with the Multifamily Housing Program for the acquisition and rehabilitation of motels and hotels to be used as Project Homekey Program shelters such as this property on December 10, 2020. The supporting information for the City Council's decision approving the project is found in Council File No. 20-0914 in the City Clerk's Council File Management System, and those documents are incorporated by reference into this report. This includes the December 4, 2020 Public Works Engineering report discussing the homelessness emergency facing the City, City's CEQA determinations, and that the project approved by City Council included obtaining any necessary Coastal Act approvals, such as this Coastal Development Permit. (C.F. No. 20-0941, BOE Report 12/4/2020, at p. 2.)

### **2. Project History: Homeless Shelter Crisis and Emergency**

#### **a. Homelessness Imposes a Loss of, or Damage to, Life, Health, Property, and to Essential Public Services in the City**

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 0.78 percent of the City's population (Los Angeles Homeless Services Authority, 2018).

In 2018, homeless persons constituted 13.5 percent of Los Angeles Fire Department's (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 (LAFD Battalion Chief and Paramedic Douglas Zabilski, 2019). 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 (Emergency Room) ER visits and psychiatric hospitalizations (Hunter, 2017) (Hwang SW, 2013).

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 (Wu, 2016). 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 (Salit, *Hospitalization Costs Associated with Homelessness in New York City*, 1988).

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, Los Angeles Police Department (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.") (Commander Dominic H. Choi, 2019). 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 (Choi, 2019). As noted more recently by the Board of Supervisors for the County of Los Angeles on October 29, 2019:

Mortality rates for people experiencing homelessness are much higher than those for the general population, have risen in the County over the past five years, and are expected to increase again for 2019. A recent analysis by the County's Department of Public Health on mortality rates and causes of death among people experiencing homelessness shed critical light on this issue and provided sobering data on recent trends. The overall mortality rate, which accounts for increases in the total homeless population over the 6-year period from 2013 to 2018, increased each year from 1,382 per 100,000 to 1,875 deaths per 100,000, with the total number of deaths among people experiencing homelessness increasing each year from 536 in 2013 to 1,047 in 2018. The leading causes of death included coronary heart disease (22%) and unintentional drug and alcohol overdose (21%), indicating that there are opportunities for interventions to prevent premature deaths (Supervisor Ridley-Thomas, Supervisor Solis, 2019) (Department of Public Health, 2019).

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 (Barrow, Susan M., PhD, Daniel B. Herman, DSW, Pilar Cordova, BA, and Elmer L. Struening, PhD, 1999). 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 (Hibbs, Jonathan R., MD, et. al., 1994). 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 (Morrison, 2009).

*Access to Healthcare.* A 2003 nationwide survey of homeless persons documented that homeless adults reported substantial unmet needs for multiple types of health care (Baggett, Travis P., MD, MPH, James J. O'Connell, MD, Daniel E. Singer, MD, and Nancy A. Rigotti, MD, , 2010). 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 (Schwarcz, Sandra K, Ling C Hsu., Eric Vittinghoff, Annie Vu, Joshua D Bamberger and Mitchell H Katz, 2009).

*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 (Baggett, Travis P et al., 2015).

**b. Unexpected and Unabated 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 (Hunter, Sarah B., Melody Harvey, Brian Briscoombe, and Matthew Cefalu, 2017). 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. The homeless shelter crisis and the rise in homelessness are the type of emergency situations that led the State to adopt (Assembly Bill) AB 1197, an urgency statute addressing homelessness that was deemed necessary for the immediate preservation of the public peace, health, or safety and for the critical necessity to address the shelter and homeless crisis within the City of Los Angeles.

The City of Los Angeles (the City) City Council declared a homeless shelter crisis pursuant to Government Code Section 8698, et seq. on April 17, 2018 (The Honorable M. Bonin & M. O’Farrell , 2019), which is currently in effect (The Honorable M. Bonin & M. Harris-Dawson, 2019). Following significant investment of resources by both the County and City, the 2018 Homeless Count showed progress in reducing homelessness, documenting a 5.5 percent overall decrease in the number of persons experiencing homelessness in LA County (LAHSA, 2020).

*Table 1 - 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 in Table 1 (LAHSA, 2020).

<b>Table 1 2018 Homeless Count Data Summary</b>		
	<b>Number of Individuals</b>	<b>Change from 2017</b>
Sheltered Homeless	8,398	6% Decrease
Unsheltered Homeless	22,887	5.3% Decrease
Total Homeless Persons	31,285	5.5% Decrease

Despite these efforts and the initial progress shown in 2018, the revised 2019 Homeless Count, released in July 22, 2020, unexpectedly documented a dramatic increase in the number of individuals experiencing both sheltered and unsheltered homelessness in (LAHSA, 2020) *Table 2 - 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 Table 2 (LAHSA, 2020):

<b>Table 2</b> <b>2019 Homeless Count Data Summary (Revised 07/20/2020)</b>		
	<b>Number of Individuals</b>	<b>Change from 2018</b>
Sheltered Homeless	8,944	6.5% Increase
Unsheltered Homeless	26,606	16.2% Increase
Total Homeless Persons	35,550	13.7% Increase

LAHSA recently published its 2020 Homeless Count, released in July 20, 2020, which shows that the homelessness emergency in the City of Los Angeles continues unabated. The documented number of individuals experiencing both sheltered and unsheltered homelessness dramatically increased yet again, as shown in *Table 3 - 2020 Homeless Count Data Summary*. (LAHSA, 2020)

<b>Table 3</b> <b>2020 Homeless Count Data Summary</b>		
	<b>Number of Individuals</b>	<b>Change from 2019</b>
Sheltered Homeless	12,438	39% Increase
Unsheltered Homeless	28,852	8.4% Increase
Total Homeless Persons	41,290	16.1 % increase

**c. Emergency Related to COVID-19 Pandemic Impacting Homeless Community**

In addition to the crisis of growing homelessness, the COVID-19 pandemic is impacting homeless persons. On March 4, 2020, the Governor proclaimed a State of Emergency for the State of California (Governor Gavin Newsom, 2020), and the Mayor of the City of Los Angeles declared a local emergency related to the threat of the COVID-19 pandemic affecting the local population (Mayor Eric Garcetti, 2020). The City is facing an unprecedented emergency at the current time due to the sudden occurrence of the COVID-19 pandemic, and this emergency is particularly concerning for the imminent threat it poses to the City’s homeless population.

On March 11, 2020, the State Department of Health issued guidance for protecting homeless Californians from COVID-19, which noted the following:

“We know that individuals experiencing homelessness are at greater risk of having an untreated and often serious health condition. This vulnerable population also has a higher risk of developing severe illness due to COVID-19,” said Dr. Mark Ghaly, Secretary of the California Health and Human Services Agency. “It is important that we act now to protect this population and the compassionate people who serve them.” (Corey Egel, 2020)

The homeless often live unsheltered, unprotected from the elements and in close contact and proximity to other individuals in the homeless community. As noted above, the homeless population is substantially more prone to underlying health conditions. The State Department of Public Health additionally states that populations “with compromised immune systems, and people with certain underlying health conditions like heart disease, lung disease and diabetes, for example, seem to be at greater risk of serious illness.” (California Dept. of Public Health, 2020) Thus, exposure to COVID-19 in the homeless population is an imminent concern for the damage it will cause on these susceptible individuals.

On March 12, 2020, the Governor’s Executive Order No. N-25-20 noted the “need to secure numerous facilities to accommodate quarantine, isolation, or medical treatment of individuals testing positive for or exposed to COVID-19.” (Governor Gavin Newsom, 2020) On March 18, 2020, the Governor issued Executive Order No. N-32-20 (Governor Gavin Newsom, 2020), which further noted imminent impacts to the homeless, as follows:

[T]he emergency of COVID-19 necessitates a more focused approach, including emergency protective measures to bring unsheltered Californians safely indoors, expand shelter capacity, maintain health and sanitation standards and institute medically indicated interventions, and add new isolation and quarantine capacity to California’s shelter and housing inventory to slow the spread of the pandemic....

The Governor has stated that “[p]eople experiencing homelessness are among the most vulnerable to the spread of COVID-19,” and “California is deploying massive resources to get these vulnerable residents safely into shelter, removing regulatory barriers and securing trailers and hotels to provide immediate housing options for those most at risk. Helping these residents is critical to protecting public health, flattening the curve and slowing the spread of COVID-19.” (California Governor, Press Release (Governor Gavin Newsom, 2020)

On March 19, 2020, the Governor issued a stay-at-home order directing residents to stay home or at their place of residence (Governor Gavin Newsom, 2020). It noted “in a short period of time, COVID-19 has rapidly spread throughout California, necessitating updated and more stringent guidance from federal, state, and local public health officials.” (Governor Gavin Newsom, 2020). Similar local Safer-at-Home orders followed (County of Los Angeles Public Health Department, 2020) (Mayor Eric Garcetti, 2020). The City’s Safer at Home order particularly noted the following:

City of Los Angeles officials and contracted partners responsible for homelessness outreach shall make every reasonable effort to persuade such residents to accept, if offered, temporary housing or shelter, as the Health Officer of the County of Los Angeles recommends that sheltering individuals will assist in reducing the spread of the virus and will protect the individual from potential exposure by allowing the individual access to sanitation tools.

(Mayor Eric Garcetti, 2020)

In the United States District Court Central District of California case of *LA Alliance for Human Rights Et Al. vs. the City of Los Angeles, Et al.* Case No. CV 20-02291 DOC (The Honorable Judge David O. Carter, 2020), concerning homelessness, the Court entered a May 2020 injunction that had ordered the City of Los Angeles in partnership with the County of Los Angeles, to protect a particular subset of persons experiencing homelessness, finding they are exposed to severely heightened public health risks as a result of where they live. (The Honorable Judge David O. Carter, 2020) Although the Court vacated that order on June 18, 2020, in favor of a homeless shelter agreement between the City and County, the Court retained its right to re-impose the May 2020 injunction. The Court's May 2020 findings concerning the emergency situation faced by homeless persons, therefore, is relevant to understanding the emergency situation.

The Injunction found that the combined risks of health impacts from living near freeways and the on-going Covid-19 pandemic constitute an emergency. The Court found that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. These locations near freeways, for example, could be contaminated with lead or other carcinogenic substances and also increase the danger that a homeless person will be struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities.

The Court further found that providing housing for persons experiencing homelessness will help stop the spread of COVID-19 persons experiencing homelessness and will also help reduce the likelihood that the disease will spread throughout the greater Los Angeles community

Taken together, the unexpected and dramatic increase in homelessness in the City and County of Los Angeles identified first in 2019 continues unabated in 2020, which is now exacerbated by the COVID-19 pandemic posing a critical emergency situation in the City of Los Angeles. This situation presents documented dangers to health, life, property and a burden on public resources

### **C. Project Cost:**

The Project cost will be approximately \$382,220.

### **D. Previous Coastal Commission Actions:**

There are no previous Coastal Commission Actions for this Project.

## II. STAFF FINDINGS

### A. Regulatory Basis of Review

PRC Section 30600(b) allows local governments to assume authority to issue coastal development permits within its jurisdiction before certification of its local coastal program and the Project is within the City Engineer's jurisdiction (LACMC Section 12.20.2 et seq.). The application filed with the City Engineer was deemed adequate.

The project is located entirely within the California Coastal Zone and is considered 'single coastal jurisdiction' (i.e., within the jurisdiction of the City of Los Angeles).

Within this single jurisdiction, a Coastal Development Permit (CDP) must be issued by the City of Los Angeles. This coastal development permit is processed pursuant to the requirements of the California Coastal Act. The proposed improvement in the coastal zone is considered a development, as defined in Section 30106 of the Coastal Act. Section 30106 states that:

*'Development' means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than agricultural purposes, kelp harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provision of the Z'berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511).*

Los Angeles City Municipal Code, Chapter 1, Article 2, Section 12.20.2.G gives the City Engineer the authority to approve, conditionally approve or disapprove any application for a Permit under the provisions of the California Coastal Act of 1976; standards as established by Division 5.5 Title 14 of the California Administrative Code (CAC); and, by the passage of the City of Los Angeles Ordinance No. 151,603 on November 25, 1978.

The proposed Project will change the use of the land and alter the existing structure, therefore it is considered a "development" as defined in the California Coastal Act. The Venice Community of the City of Los Angeles does not have a certified Local Coastal Program. However, after certification of the Local Coastal Program, permit processing procedures for coastal permits in the Venice coastal zone are controlled by the Coastal

Act and the California Code of Regulations. The City's permit issuing ordinances must be certified as part of the Local Implementation Plan. After certification of the Local Coastal Program by the Coastal Commission, the authority of the Coastal Commission is limited to development within the retained or original jurisdiction and to appeals of locally issued coastal development permits. The Coastal Commission will also retain jurisdiction over amendments to coastal development permits that it approved before certification of the Local Coastal Program. Section 30519(a) of the Coastal Act provides that, except for appeals to the commission (as provided in Section 30603) after a Local Coastal Program, or any portion thereof, has been certified and all implementing actions have become effective, the development review authority provided for in Chapter 7 (commencing with Section 30600) of the Coastal Act shall no longer be exercised by the Coastal Commission and shall at that time be delegated to the local government that is implementing the Local Coastal Program. Section 30519(b) states that 30519(a) does not apply to development proposed or undertaken on any tidelands, submerged lands, or on public trust lands. The Commission also retains jurisdiction over coastal development permits that were previously approved by the Commission as well as amendments to such permits.

## **B. Issues of Legal Adequacy of the Application**

None

## **C. Findings**

Six findings are required in order for a Coastal Development Permit to be issued. The six findings are:

- (1) That the development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code (PRC)).
- (2) That the permitted development will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act of 1976.
- (3) That the Interpretative Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making its determination.
- (4) That the decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.
- (5) If the development is located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone that the development is in

conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

- (6) Any other finding or findings as may be required for the development by the California Environmental Quality Act.

Staff finds as follows:

**1. The development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).**

The following Sections of the California Coastal Act were considered and found to be consistent, but not applicable to the proposed Project.

**a) PUBLIC ACCESS (Article 2, of Chapter 3 of Public Resources Code, Sections 30210 through 30214).**

***Sections 30210, 30211, 30212, and 30212.5.***

The Project includes the change of use from a motel to an interim crises and bridge housing homeless shelter; and the interior and exterior tenant improvements of the existing two-story motel. The Project site is located approximately 1.3 miles east of the Pacific Ocean within an urban area along Washington Blvd. As such, the Project does not interfere with coastal or oceanfront areas. Therefore, the proposed Project is not expected to impede coastal or oceanfront recreation activities. This is consistent with the Public Access policies in Chapter 3 of the California Coastal Act.

**b) RECREATION (Article 3, of Chapter 3 of Public Resources Code, Sections 30220 through 30224).**

***Sections 30220, 30221, 30222.5, 30223, and 30224.***

The Project includes the change of use from a motel to an interim crises and bridge housing homeless shelter; and the interior and exterior tenant improvements of the existing two-story motel. The Project site is located approximately 1.3 miles east of the Pacific Ocean within an urban area along Washington Blvd. As such, the Project does not interfere with upland, coastal or oceanfront areas. Therefore, the proposed Project is not expected to impede coastal or oceanfront recreation activities. This is consistent with PRC *Sections 30220 – 30221, 30222.5, 30223, and 30224* in Chapter 3 of the California Coastal Act.

**c) MARINE ENVIRONMENT (Article 4, of Chapter 3 of Public Resources Code, Sections 30230 through 30236).**

***Sections 30230 – 30236.***

The Project includes the change of use from a motel to an interim crises and bridge housing homeless shelter; and the interior and exterior tenant improvements of the existing two-story motel. The Project site is located approximately 1.3 miles east of the Pacific Ocean within an urban area along Washington Blvd. As such, the Project does not interfere with any marine environment. Therefore, the proposed Project is not expected to impact any marine environment. This is consistent with PRC *Sections 30230 – 30236* in Chapter 3 of the California Coastal Act.

**d) LAND RESOURCES – ARCHEOLOGICAL OR PALEONTOLOGICAL RESOURCES (Article 5 of Chapter 3 of Public Resources Code, Sections 30240 through 30244).**

***Sections 30240 – 30244.***

The Project includes the change of use from a motel to an interim crises and bridge housing homeless shelter; and the interior and exterior tenant improvements of the existing single-story motel. The Project site is located approximately 1.3 miles east of the Pacific Ocean within an urban area along Washington Blvd. There are no environmentally sensitive habitat areas, archaeological or paleontological cultural resources, agricultural lands, and timberlands adjacent or near the site. As such, the Project does not interfere with any coastal land resources. Therefore, the proposed Project is not expected to impact any coastal land resources. This is consistent with PRC *Sections 30240 – 30244* in Chapter 3 of the California Coastal Act.

**e) DEVELOPMENT (Article 6 of Chapter 3 of Public Resources Code, Sections 30250 through 30255).**

***Sections 30250(b), 30250(c), 30251, 30252(2), 30252(5), 30252(6), 30254, 30254.5, 30255.***

The proposed Project does not include new development. The proposed Project includes the change of use from a shuttered motel to an interim crises and bridge housing homeless shelter; and the interior and exterior tenant improvements of the existing two-story motel. The Project site is located approximately 1.3 miles east of the Pacific Ocean within an urban area along Washington Blvd. It is not located along the ocean or a scenic coastal area. There are existing commercial uses adjoining the proposed Project. There is no industrial development adjacent or near the site. The proposed Project is consistent with the character of the surrounding development because it is already part of the urban fabric. The proposed Project will not adversely impact coastal resources; including coastal views, or coastal areas. Further, the proposed Project is not a commercial facility, public works project, a sewage treatment plant, a new hazardous development, high density high-rise building or a visitor-serving recreation facility. As such, the proposed Project does not interfere with any coastal resources. Therefore, the proposed Project is not expected to impact any coastal land resources. Thus, this is consistent with the Development policies,

*Sections 30250(b), 30250(c), 30251, 30252(2), 30252(5), 30252(6), 30254, 30254.5, and 30255, in Chapter 3 of the Coastal Act.*

**f) INDUSTRIAL DEVELOPMENT** (Article 7 of Chapter 3 of Public Resources Code, Sections 30260 through 30265.5).

**Sections 30260-30265.5.**

The Project includes the change of use from a motel to an interim crises and bridge housing homeless shelter; and the interior and exterior tenant improvements of the existing two-story motel. The Project site is located approximately 1.3 miles from the Pacific Ocean within an urban area along West Washington Blvd. There is no industrial development at the site or adjacent or near the site. Therefore, the proposed Project is not expected to create an industrial development impact. This is consistent with PRC *Sections 30260 – 30265.5* in Chapter 3 of the California Coastal Act.

**RELEVANT SECTIONS OF THE CALIFORNIA COASTAL ACT**

The relevant Coastal Act Policies analyzed for consistency are the Public Access, Recreation, and Development policies in Chapter 3 of the California Coastal Act. They are as follows:

**a) PUBLIC ACCESS (Article 2, of Chapter 3 of the Public Resources Code, Sections 30210 through 30214).**

Coastal Act §§ 30210, 30213, 30214(a)2 state:

***Coastal Act § 30210.** In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

***Coastal Act § 30213.** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.*

***Coastal Act § 30214(a).** The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the (2) The capacity of the site to sustain use and at what level of intensity.*

**b) RECREATION (Article 3, of Chapter 3 of Public Resources Code, Sections 30220 through 30224).**

Coastal Act § 30222 states:

**Coastal Act § 30222.** *The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.*

**d) DEVELOPMENT (Article 6 of Chapter 3 of Public Resources Code, Sections 30250 through 30255).**

Coastal Act §§ 30250(a), 30252, and 30253 state:

**Coastal Act § 30250(a).** *New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.*

**Coastal Act § 30252.** *The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation.*

**Coastal Act § 30253.** *New development shall do all of the following: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard, (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs, (c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development, (d) Minimize energy consumption and vehicle miles traveled, (e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.*

## **Environmental Justice**

The Coastal Act's mandates to provide maximum Public Access, Recreational, and Development opportunities for all, and to protect, encourage, and provide lower-cost visitor and recreational opportunities embody fundamental principles of environmental justice. (California Coastal Commission, 2019) The Commission acknowledges the historical use of discriminatory housing policies in California and their impact on present

day demographics in the coastal zone. (California Coastal Commission, 2019) The CA Coastal Commission's commitment to diversity, equality and Environmental Justice to protect the coast for the benefit of all people includes the protection and provision of new affordable housing units within the Coastal Zone as a fundamental part of coastal access. Historic inequalities, population growth, dynamic demographics, discriminatory socio-economic factors, biased judicial decisions, and policy choices have and continue to shape Coastal development patterns that widen the economic disparity gap. Marginalized populations, including persons experiencing homelessness, low-income communities, and non-white communities have been historically denied affordable housing in the coastal zone. Lack of social equity in housing continues today, in fact, there have only been 13 new affordable housing units constructed in the community of Venice in the last 11 years. (Department of City Planning, 2021) Only about 9 percent of the new units added over the past five years have been affordable to households earning less than the area median income. (UCLA, 2021).

Coastal Act § 30604(g) states "the Legislature finds and declares that it is important for the commission to encourage the protection of existing and the provision of new affordable housing opportunities for persons of low and moderate income in the coastal zone." Further, Coastal Act § 30604(h) states "when acting on a coastal development permit, the issuing agency, or the commission on appeal, may consider environmental justice, or the equitable distribution of environmental benefits throughout the state."

The Coastal Act prefers that low-cost visitor recreation facilities are built when feasible within the Coastal Zone, however, the lack of affordable housing within the City as a whole, as well as in the Venice community has exacerbated the homeless crises in the area. The homelessness crises should be taken into account to assess the need to regulate the time, place, and manner of low cost visitor and recreation access depending on the facts and circumstances. The proposed Project provides interim housing units; 100% of which are designated as interim affordable with supporting homeless services, including drug and mental health counseling; and housing case management.

This is consistent with Coastal Act §§ 30604(g)&(h) regarding new affordable housing and is also favored by the Commission's Environmental Justice Policy (adopted in March 2019), encouraging equitable access to coastal resources and low-cost visitor and recreation opportunities as required by the Public Access, Recreation, and Development policies in Chapter 3 of the California Coastal Act, and will not adversely affect access for coastal visitors.

## ARTICLE 2 PUBLIC ACCESS

### **Protection of Low Cost Visitor Recreation Uses**

The proposed Project includes the introduction of interim affordable homeless housing into the Venice Coastal Zone. The Project would convert 33 motel rooms to interim supportive housing units for people experiencing homelessness. According to PATH, the

Ramada Inn Marina was being used to house people experiencing homeless through housing vouchers before it was acquired by the City. There were only three people living in the motel when it was purchased in December 2020. (PATH, Operations, 2020) Ramada is a large hotel chain owned and operated by Wyndham Hotels & Resorts. Ramada Limited hotels are budget-oriented properties.

Coastal Act Section 30210 requires the provision for maximum access and recreational opportunities for "all people" including the people occupying the interim housing. The Project will prioritize people experiencing homelessness from the Venice community that surround the site, with a service provider that will be located on-site to address issues.

Converting this hotel to a shelter that provides interim housing for homeless individuals will not negatively impact public access or recreation opportunities. There are a total of about 7 other low cost budget hotels in the Venice area. They are listed in the following table.

Table 4 Venice Low Cost Budget Hotels	
HOTEL NAME	ADDRESS
Jolly Roger Hotel	2904 W Washington Blvd, Venice, CA 90291
Encore Hotel	13432 Washington Blvd, Venice, CA 90292
The Kinney Venice Beach	737 Washington Blvd, Venice, CA 90292
Tripper Electric Beach Suites & Pods	23 Paloma Ct, Venice, CA 90291
AIR Venice	5 Rose Ave, Venice, CA 90291
Marina Venice	2435 Lincoln Blvd, Venice, CA 90291
Inn at Venice Beach	327 W Washington Blvd, Venice, CA 90291
Samesun Venice Beach	25 Windward Ave, Venice, CA. 90291

Source: Google

There is low demand for low-cost lodging in Venice, such as this hotel, since most tourists who visit Venice prefer destination type and boutique brand hotels. For those visitors who do prefer low-budget coastal accommodations, there are options to stay at a bed and breakfast or at other low-budget visitor accommodations in the Coastal Zone communities adjacent to Venice for a comparable price.

The low budget motel accommodations in Venice and the adjacent coastal communities within the Coastal Zone are supplemented by an ample supply of Air BNB low cost room accommodations. As of Fiscal Year 2020/2021 Q2, Venice has 100 Air BNB rooms for overnight accommodations. (City of Los Angeles, 2021) Empirical data was analyzed regarding publicly available information about Airbnb listings in Venice, Los Angeles, CA (Air BnB, 2021) The collection sample included approximately 90 Airbnb listings filtered by "Entire Place" and located within Venice's boundaries. "Entire Place" is a listing in which the guest would have the whole accommodation to themselves. This usually includes a bedroom, a bathroom, and a kitchen. The cost of each Airbnb listing was recorded and, of the 90 listings, the average cost per night was approximately \$139 USD.

The hotel room rate at a Ramada by Wyndham hotel in the area ranges between \$99 - \$159. (Wyndham Hotels, 2021) This is comparable in price and therefore can be a supplement to low cost visitor uses.

Further, Council District 11 also includes the coastal communities of Los Angeles south of Venice. These coastal communities share coastal resources and are connected via multi-modal transportation access. Venice is very close to the Los Angeles International Airport (LAX), which is also within the Coastal Zone of Los Angeles. The Venice Coastal Zone is easily accessible via public transportation from LAX to the south and Santa Monica to the north along Pacific Coast Highway and Sepulveda Blvd. The City of Santa Monica, that is located just to the north of Venice also has low-cost budget motels and hotels; and is also in the Coastal Zone. These low-cost visitor accommodations in other coastal communities directly adjacent to Venice to the north and south are also coastal resources, and can be considered to supplement the low-cost visitor recreation accommodation supply in Venice. This shows that Venice and its adjacent Coastal Zone communities have access to an ample supply of comparably priced motels, hotels, and short term rental properties which are considered low cost visitor recreation accommodations, within Council District 11, and within the City of Santa Monica, both located in the California Coastal Zone.

Even with the ample low cost motel, hotel, and bed and breakfast accommodations surrounding the Project site, the occupancy rate for California declined approximately 36% in 2020 and is not forecasted to recover for several years (only back to 94% of 2019 levels in 2023). The immediate impact was a 77% decline in 2020 Transient Occupancy Tax revenues – a shortfall that is not recoverable. (Hotel Association Los Angeles, 2021) Tourism spending in California was expected to drop to \$66.1 billion in 2020, erasing a decade of growth. Travel-related spending from visitors is not expected to recover for several years (Domestic visitors 74% of 2019 levels in 2021; International 54%; Leisure 85%; Business-related 56%). Travel-related spending in California is not expected to reach pre-coronavirus levels until 2024. (Visit California, 2021) Average Daily Rate in California is forecast to grow 9% in 2021, following a 24.2% projected decline in 2020. (Visit California, 2021) By introducing housing for people experiencing homelessness in Venice, tourism will improve because it would lessen the amount of encampments directly around the Project site.

The Wyndham Hotel chain, who owns the Ramada Inn brand, stock trending is negative (WH -2.97%) as of January 23, 2021 (The New York Stock Exchange, 2021) and the occupancy rate is down 30% as of December 2020 per the CEO. (Barron's, 2020) Other low-cost hotels in the area are selling to boutique chains or participated in Project Homekey to relieve financial hardship from underperforming motels. (Department of City Planning, 2021)

As noted above, the visitor demographic that visits Venice Beach prefers more destination type experiences in boutique or upscale lodging. There is low tourist demand for low-cost budget motels in the surrounding area and an ample supply of low cost hotel and

motel accommodations, and low cost bed and breakfast accommodations within the Venice community and adjacent coastal communities.

Low-cost chain motels and hotels in the area have not been performing well and were used for low-income housing that allow for low-income housing vouchers for payment (Venice Housing Corps, 2020). Occupancy rates for motels such as the Ramada Inn Marina will not rebound for at least 3 years. Some of these low-cost visitor hotels have been sold to boutique hotel chains since occupancy rates for the last couple of years were not sustainable. (Department of City Planning, 2021) Further, the demand for motel rooms plummeted when Covid-19 hit Los Angeles in March, 2020, forcing further economic hardship for lodging in the area.

The visitor preference for higher end and boutique type hotels, ample low cost hotel and motel visitor accommodations, and bed and breakfast accommodations in the area shows that the loss of this low-end underperforming motel is insignificant to the overall lodging choices in Venice and the adjacent communities within the Coastal Zone. The capacity for the site to remain a visitor and recreational use would not be sustainable since the hotel would have failed to continue to operate regardless of the project. The change of use from a low cost visitor recreation use (a motel) to interim supportive affordable housing is more feasible, and it allows the City to respond to the current emergency homeless crises and the lack of affordable housing in the area surrounding the Project. New affordable housing is the more sustainable action towards addressing chronic homelessness in the community of Venice and the state of California as a whole. This is consistent with the Public Access policies in Chapter 3 of the California Coastal Act, and will not adversely affect access for coastal visitors.

### **Public Safety - Fire Life Safety Design and Operations**

Coastal Act § 30210 Public Access “guarantees maximum access....shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.” There are several elements that will be included in the Project’s operations that enhance the public safety aspect of the Project. They include a rear barrier along Harrison St. to provide better control over access to the Project via Washington, PATH on-site staff that are well trained and are effective in working with the population, overnight security guards located on-site, security cameras, and a community hotline.

A safety perimeter boundary will be installed on the rear property line as a fire life safety design element for residents who live along Harrison St., residents of the Ramada Inn Homeless Shelter, and pedestrians walking westbound down Harrison St. from Lincoln Blvd. to Washington Blvd., eventually accessing Venice Beach. The 8-foot height of the safety perimeter boundary would be in compliance with the design guidelines applicable to the Project site. Appropriate plantings (such as climbing vines) can turn separation of homeless facility use and pedestrian access way into a “green wall” that adds comfort to the pedestrian environment, while keeping beach access open. Such a design element would reduce the incidence of graffiti and affiliated loitering concerns and enhance the

rustic appearance (as encouraged in the Venice Land Use Plan) of the exterior Ramada Inn Homeless Shelter to fit in with the surrounding single family uses. Additionally, any utility areas adjacent to Right-a-way would need to be screened by landscaping, shrubs, or hedges.

The boundary would also be accompanied by shelter staff on-site that are well trained and are effective in working with the population, overnight security guards, security cameras, a community hotline; and security lights as safety measures as recommended in the Venice Land Use Plan. Lighting would also improve nighttime security for passerby and nearby uses, and as required by the Complete Street Design Guidelines, appropriate plantings (such as climbing vines) would separate pedestrians from unsightly land uses and adds safety to passersby. A safety perimeter boundary, overnight security personnel, on-site staff that are familiar with the population, a community hotline, and security lights in the design does not preclude the City or the operator to committing to the request for these. Any such elements must have a direct correlation and must be in relation to the California Coastal Act.

## **ARTICLE 5 RECREATION**

### **Protection of Low Cost Visitor Recreation Uses**

Converting this hotel to a shelter that provides interim housing for homeless individuals will not impact low-cost visitor recreation opportunities. The change of use from a low cost visitor recreation use (a motel) to interim supportive affordable housing is more feasible, and it allows the City to begin to respond to the current emergency homeless crises and the lack of affordable housing in the area surrounding the Project. New affordable housing is the more sustainable, just, and equitable action towards addressing chronic homelessness in the community of Venice and the state of California as a whole.

### **Affordable Housing**

There have only been 13,000 new affordable housing units built in the City of Los Angeles in the past 11 years. Only 29 affordable units have been added to the Venice Coastal Zone in the same period. (Department of City Planning, 2021)

The Los Angeles Homeless Services Authority (LAHSA) estimated that 509,000 new affordable housing units are needed to meet current affordable housing demand without taking into account the impacts of the COVID-19 pandemic.

LAHSA's COVID-19 recovery plan seeks to house 15,000 vulnerable people experiencing homelessness. (UCLA, 2021) Also, the City of Los Angeles and the County of Los Angeles recently reached an agreement in litigation before U.S. District Judge David O. Carter how to address the unsheltered and unhoused people in makeshift encampments near freeways. Based upon this lawsuit, the City and County have committed to provide an additional 6,000 new beds in 2021 for unhoused residents currently living near freeways. (UCLA, 2021)

A dramatic expansion in low-income housing stock is urgently needed, and the large-scale public acquisition of vacant hotels and motels is the most effective model to expand low-income affordable housing by shifting property use from hospitality to housing. (UCLA, 2021) Project Homekey provides a unique opportunity to obtain Federal funding as a statewide strategy to purchase empty or struggling low-end motels, especially those that are in financial hardship, and use them for affordable housing.

Affordable housing is the most effective solution to homelessness. The proposed Project is 100% interim affordable housing. So, even though visitor recreation facilities are preferred when feasible within the Coastal Zone, the lack of affordable housing in Venice has created an emergency homeless crisis in the area.

### **Homelessness**

The Venice community of Los Angeles (Venice) has experienced a substantial increase in homelessness over the last two years. As of January 2020, there are a total of 1,981 people experiencing homeless in Venice. The number of people experiencing homelessness in Venice increased more than 57% from 2019 to 2020. Sheltered people experiencing homelessness increased more than 33%, and unsheltered people experiencing homelessness increased more than 65% over the same period. (LAHSA, 2020) The number of people experiencing homelessness in the City of Los Angeles during the same period increased only 16%. Please refer to Tables 5 and 6. City of Los Angeles' Bureau of Sanitation is the City's designated administrative agency on matters pertaining to homeless encampments. LAMC § 56.11 and its adopted protocols relate to the storage of personal property within the public right-of-way.

The total population of the City of Los Angeles is 4 million, with a total of 41,290 people experiencing homelessness. Approximately, one percent of people in the City are homeless. The total population of the community of Venice is 36,898, with a total of 1,981 people experiencing homelessness. Approximately, five percent of people living in the community of Venice are homeless. This equates to the fact that a person is 5 times more likely to be homeless in Venice, compared to the greater City of Los Angeles as a whole. The number of people experiencing homelessness in Venice is trending upwards, increasing more than 57% from 2019 to 2020. These numbers show that chronic homelessness is more severe in the community of Venice where the project is located compared to the City as a whole. Therefore, affordable housing in Venice is in more demand than it would be in the rest of the City.

<b>Table 6</b> <b>VENICE</b> <b>2020 Homeless Count Data Summary</b>		
	<b>Number of Individuals</b>	<b>Change from 2019</b>
Sheltered Homeless	80	33.3% Increase
Unsheltered Homeless	1,901	65% Increase
Total Homeless Persons	1,981	57.2% Increase

### Project Homekey

The downturn of the tourism and travel related spending over the last year negatively affected the economic vitality of the Ramada Inn Marina. Project Homekey provided financial relief for struggling motels and hotels that were in poor economic health, and that were not going to make it through the economic downturn brought on by Covid-19 by providing funds to local agencies to purchase the distressed businesses and use them for homeless interim housing. This particular Project is unique because it is the only acquired Project Homekey motel site within the City of Los Angeles' Coastal Zone.

Project Homekey is California's innovative real estate acquisition program to purchase

<b>Table 5</b> <b>VENICE</b> <b>2019 Homeless Count Data Summary</b>		
	<b>Number of Individuals</b>	<b>Change from 2018</b>
Sheltered Homeless	60	-50.4% Increase
Unsheltered Homeless	1,200	40.52% Increase
Total Homeless Persons	1,260	84.6 % Increase

and rehabilitate housing, including hotels, motels, vacant apartment buildings and other properties, and convert them into permanent, long-term housing for people experiencing or at risk of experiencing homelessness. (State of California, 2020) Project Homekey is a historic investment opportunity for the City and State to use Federal funding to purchase

affordable housing. This unique benefit put the City and State in a strong economic position to make historic infrastructure investments in affordable housing. It is the second phase (following Project Roomkey) in the state's response to protecting Californians experiencing homelessness who are at high risk for serious illness and are impacted by COVID-19. It was funded by a \$600 million in grant funding that was made available to local public entities, like the City of Los Angeles within California, to purchase and rehabilitate housing, including motels, and convert them into interim or permanent, long-term housing. (State of California, 2021)

The data shows that the capacity for the site to remain a visitor and recreational use would not be sustainable considering the economic impacts of dismal hotel occupancy rates, the lack of affordable housing, and chronic homelessness in the surrounding area. The visitor demographic that visits Venice Beach prefers more destination type experiences in boutique or upscale lodging to low-cost budget lodging. Tourism, travel-related domestic and international, leisure, business related spending are all in economic recovery. The Wyndham Hotel chain, who owns the Ramada Inn brand occupancy rate is down 30% as of December 2020. Hotel occupancy rates in California are recessed approximately three years. All the while, the lack of affordable housing in Venice has created an emergency homeless crises in the Venice public realm, including the beach. Affordable housing is the most effective solution to homelessness. Affordable housing in Venice is in more demand than it would be in the rest of the City.

Therefore, in consideration of environmental justice and the equitable distribution of environmental benefits throughout the state, the change of use from a low cost visitor recreation use (a motel) to interim supportive affordable housing is more feasible, and it allows the City to begin to respond to the current emergency homeless crises and the lack of affordable housing in the area surrounding the Project. New affordable housing is the more sustainable, just, and equitable action towards addressing chronic homelessness in the community of Venice and the state of California as a whole. Therefore, the removal of the 33 beds at the Ramada Inn Marina will not adversely affect the supply for low-cost visitor recreation uses. This is consistent with the Public Access, Recreation, and Development policies in Chapter 3 of the California Coastal Act, and will not adversely affect access for coastal visitors.

### **City's Homeless Program Outreach Strategy**

The City's Homeless Program Outreach Strategy prioritizes two primary populations. 1) Those who live near overpasses, underpasses, and ramps on all freeways and City and County streets; and 2) Targeted encampments surrounding the Project vicinity and demobilizing Project Roomkey participants.

This is done with a Homeless Management Information System (HMIS). HMIS is a web-based application that is designed to collect information on the characteristics and service needs of homeless persons. The system allows agency users and the Los Angeles Homeless Services Authority (LAHSA) to use collected information for informed programmatic decision-making. Participating agencies collect and input standardized

client-level and demographic data into the system, including client/household demographic details; relationships within a family and household; client/household income; client/household documents; case management and services; housing placements; and progress for housing retention. The HMIS includes a focus on Outcomes Management that sets and measures milestones and target achievements of clients and program performance.

On May 22, 2020, a Preliminary Injunction issued by the United States District Court Central District of California heard through a case titled, *LA ALLIANCE FOR HUMAN RIGHTS ET AL. v. CITY OF LOS ANGELES ET AL.*, ordered the City and County of Los Angeles to protect a particular subset of persons experiencing homelessness, those who live near overpasses, underpasses, and ramps on all freeways and City and County streets, who are exposed to severely heightened public health risks as a result of where they live. The Court found that the combined risks of health impacts from living near freeways, and the Covid-19 pandemic public health efforts constitute an emergency and that a response cannot wait until this case is resolved by settlement or trial. The Court sited that it is unreasonably dangerous for humans to live in areas which have deleterious health impacts and can shorten a homeless person's life expectancy by decades. Locations near freeways could be contaminated with lead or other carcinogenic substances. These locations also increase the danger that a homeless person will be struck by a vehicle or injured in the event of an earthquake or crash. Camps in these locations can also burden the general public—for example, by posing potential hazards to passing motorists, or by making sidewalks and other rights-of-way inaccessible to individuals with disabilities. (The Honorable Judge David O. Carter, 2020)

The City's the efforts to shelter vulnerable residents of the City and County of Los Angeles during the COVID-19 pandemic complies with the Court's preliminary injunction. It broadens — not replaces — COVID-19 emergency public health efforts, parallel to each other, rather than sequentially. The City of Los Angeles and County of Los Angeles have the capacity and resources to comply with the injunction while maintaining our unprecedented efforts to protect vulnerable residents from COVID-19. (The Honorable Judge David O. Carter, 2020)

The Court ordered that the City and County of Los Angeles must humanely relocate and provide shelter—or alternative housing options, such as government encampments following the existing Veterans Affairs model, safe parking sites, or hotel and motel rooms contracted following the Project Roomkey model—to individuals experiencing homelessness camped within 500 feet of an overpass, underpass, or ramp in the City and County of Los Angeles, no later than September 1, 2020. (The Honorable Judge David O. Carter, 2020)

Through this Project Homekey Project, the City of Los Angeles in partnership with the County of Los Angeles (County) and the Los Angeles Homeless Services Authority (LAHSA) are taking action and providing solutions to homelessness. The City committed to creating 6,100 new shelter opportunities in the next 10 months following the agreement with the court, which must be done by December 2021. (City of Los Angeles, 2021) The

City's plan is contingent upon each shelter location receiving the appropriate levels of necessary County-funded support and operating services under the voter approved tax initiative Measure H, the County funds operating services for homeless facilities called for in the County Homeless Strategy. (The Honorable Judge David O. Carter, 2020)

The City and LAHSA have developed a sustainable outreach strategy that is customized for this specific location for prioritizing interim housing resources to reach targeted encampments surrounding the Project vicinity and demobilizing Project Roomkey participants. This collaboration includes the Los Angeles County Department of Public Health, LA Family Housing, and LAHSA who have dedicated staff that familiarize themselves with the people who are living on the streets surrounding the City's interim housing shelters. A dedicated team go out and get to know the needs of this population to match people who they assess can thrive in a single-room environment.

The Ramada Inn Marina will be in a much smaller setting, scope, and scale compared to other City shelters so outreach teams will assess who are more better suited for the space. The ratio of staff to residents at this site is higher than some of the other sites that house up to 100 people experiencing homelessness.

The homeless count is done in different zones that span out from the interim housing shelters' locations. Counts are completed at "a point in time" to include the number of people experiencing homelessness surrounding the site multiple times to confirm that the population who shows interest are indeed from the adjacent Venice community surrounding the site. Identifying interest lists are generated from this population who are encouraged to join the list as clients. Interest lists for interim housing are built initially from encampments identified by Council Districts. Other areas of the Council District will be considered if all beds cannot be filled from target encampments.

This prioritization for interim housing resources considers that people entering and prioritized for interim housing have permanent housing resources available to transition into exit destinations and pathways to permanent housing. This ensures that interim housing beds can serve more individuals. A variety of housing interventions through collaboration with homeless service providers who provide the appropriate level of care required to support each participant as they transition into permanent housing. This strategy prioritizes the best target population; clients that are matched to a housing subsidy (Roadmap, Recovery Rehousing, Rapid Rehousing, or other permanent supportive housing), whether from other demobilizing Project Room Key sites or targeted encampments surrounding the shelters. Different interim housing bed types prioritize clients differently depending upon their needs. In order to maximize bed turnover in the interim housing portfolio, clients should be provided the financial and case management support they need to exit into successful permanent housing interventions for which they are eligible, and which best meet their needs. The more clients that come to the interim housing shelter with housing subsidies, the more clients will exit to permanent housing, allowing for new clients to access the interim housing beds. (LAHSA, 2021)

In conclusion, as noted above, the visitor demographic that visits Venice Beach prefers more destination type experiences in boutique or upscale lodging. There is low tourist demand for low-cost budget motels in the surrounding area; and an ample supply of low cost hotel and motel accommodations, and low cost bed and breakfast accommodations within the Venice community and adjacent coastal communities.

Low-cost chain motels and hotels in the area have not been performing well and were used for low-income housing that allow for low-income housing vouchers for payment (Venice Housing Corps, 2021). Occupancy rates for motels such as the Ramada Inn Marina will not rebound for at least 3 years. Some of these low-cost visitor hotels have been sold to boutique hotel chains since occupancy rates for the last couple of years were not sustainable. (Department of City Planning, 2021) Further, the demand for motel rooms plummeted when Covid-19 hit Los Angeles in March, 2020, forcing further economic hardship for lodging in the area.

The visitor preference for higher end and boutique type hotels, ample low-cost hotel and motel visitor accommodations, and bed and breakfast accommodations in the area shows that the loss of this low-end underperforming motel is insignificant to the overall lodging choices in Venice and the adjacent communities within the Coastal Zone. The capacity for the site to remain a visitor and recreational use would not be sustainable since the hotel would have failed to continue to operate regardless of the project. The change of use from a low cost visitor recreation use (a motel) to interim supportive affordable housing is more feasible, and it allows the City to respond to the current emergency homeless crises and the lack of affordable housing in the area surrounding the Project. New affordable housing is the more sustainable action towards addressing chronic homelessness in the community of Venice and the state of California as a whole. This is consistent with the Recreation policies in Chapter 3 of the California Coastal Act, and will not adversely affect low cost visitor recreation access for coastal visitors.

## **ARTICLE 6 DEVELOPMENT**

The Project does not include new development. The Project includes the change of use from a shuttered motel to an interim crisis and bridge housing homeless shelter; and the interior and exterior tenant improvements of the existing two-story motel. The Project site is located approximately 1.3 miles from the Pacific Ocean within an urban area along Washington Blvd. There are no scenic corridors, and there are no coastal dependent resources adjacent or near the site.

The project is consistent with the character of the surrounding development and will not adversely impact coastal resources consistent with Chapter 3 policies of the Coastal Act. including but not limited to Public Access, Recreation, and Development.

The Project is a change of use from a motel to a residential, interim housing use on an existing development located in a dense, urban, primarily commercial inland area of the Coastal Zone, in close proximity to other residential uses (Section 30250). This project is not considered a “new” development and is located in a developed area that can

accommodate the re-use of an existing failed, defunct motel. Therefore, the Project will not be inconsistent with the character of the surrounding uses or create any significant adverse effects.

Section 30251 of the Coastal Act protects public views to and along the coast and requires permitted development be sited and designed to be visually compatible with the character of surrounding areas. The Proposed Project is an existing shuttered motel that includes a change of use to interim affordable housing, and minor tenant improvements. The site is already part of the urban fabric. The project site is located in an area designated General Commercial. (City of Los Angeles, 2021) This land use designation is intended to maintain the uses, density, and character of existing low intensity commercial areas. Thus, the Project, with interim affordable housing will provide social programs and services for the residents; is allowed under the certified Venice LUP. (Department of City Planning, 2021)

The project would not affect geologic, flood, or fire risks (30253(1) (2)), would not conflict with any requirements of the State Air Resources Control Board or South Coast Air Quality District (30253(3)), would not affect energy consumption and vehicle miles traveled (30253(4)), and would not permanently affect the local community (30253(5)).

Section 30252(1) of the Coastal Act encourages facilitating the provision or extension of transit service, and (2) providing non-automobile circulation within the development. The proposed Project is within 600 feet of a regional transit stop at the intersection of Lincoln Blvd. and Washington Blvd. Also, the Project site includes landscaped grounds and open space. The proposed Project includes bicycle parking. This provides for active transportation opportunities in biking and walking. This is consistent with the Chapter 3 Development policies of the Coastal Act and will not adversely impact coastal resources.

## **Parking**

*Coastal Act § 30252(4). Requires new development to maintain public access to the coast by providing adequate parking facilities or providing substitute means of serving the development with public transportation.*

Per the Venice Specific Plan, the prior motel has legal non-conforming parking that displaces on-street coastal parking. The prior motel building was originally constructed as a 30 guest room hotel with 3 additional dwelling units. The original permit shows 18 parking stalls provided (tucked under the building). The required parking at the time was for 0.5 stalls per guest room. (City of Los Angeles, Department of Building and Safety, 2021) The motel use requires much more parking than the 18 parking spaces that were originally provided. Today, the motel occupancy would require 86 parking spaces (66 spaces for 33 residential units, 12 beach impact parking, 8 spaces for guest parking). (Department of City Planning, 2021) So, the proposed Project improves coastal on-street parking by changing the use of the motel to interim homeless housing, and providing adequate parking that complies with the lower parking utilization rates of those who are experiencing homelessness.

AB 744 amended Section 65915 of the Government Code to include provisions for reduced parking rates for affordable housing. Legislature finds that there exists a severe shortage of affordable housing, especially for persons and families of extremely low, very low, and low income, and there is an immediate need to encourage the development of new housing. AB 744, Section 65915(p)(2), 65915(p)(3), and 65915(p) (3)A, state that if a development includes the maximum percentage of low- or very low income units or if a development consists solely of rental units, exclusive of a manager's unit or units, with an affordable housing cost to lower income families, and is located within one-half mile of a major transit stop, and there is unobstructed access to the major transit stop from the development; then, a vehicular parking ratio, should not exceed 0.5 spaces per bedroom. (State of California, 2015)

Further, in a recent study conducted by Fehr & Peers in April 20, 2017, 42 affordable housing sites within the City of Los Angeles were surveyed for vehicle trip generation and parking. The results indicate that parking utilization ratios are less than the ratios required in the certified Venice LUP. The study indicated that permanent supportive affordable housing, created a demand between 0.2 and 0.48 spaces per unit. (Fehr and Peers, 2017). Additionally, in March 2019, Crain and Associates produced a report on the effects of a 100% affordable housing project and transit availability on personal vehicle ownership and parking demand. That study concluded that substantial evidence and academic research support reduced car ownership and parking utilization by lower income households and housing in close proximity to public transit. (Crain and Associates, 2019)

Applying a parking ratio of 0.2 to 0.48 parking spaces per unit for affordable supportive housing, as suggested in the Fehr & Peers April 2017 study, between 7 and 16 spaces would be required for the 33 housing units. Applying AB 744 parking ratio of .5 spaces per unit for affordable supportive per AB 744, 16.5 spaces would be required for the same amount of units.

Currently, the Los Angeles zoning code requires 1 stall per guestroom for the first 30 guest rooms of a hotel and 0.5 stalls for the next 30 guest rooms. Also, up to 15% of these parking stalls may be replaced with bicycle parking because the Project is within 1,500 ft of a major transit stop at Lincoln Blvd. and Washington Blvd., (service at no more than 15 minute intervals). The Project can further apply incentives to reduce parking via Affordable Housing Incentives - Density Bonus (Section 12.22 A.25 of the LAMC). This section allows for parking to be calculated at the ratio of 0.25 stalls per restricted, affordable residential hotel unit. As these guest rooms would be used for non-transient residents (Residential Hotel), the parking would be based on the quantity of habitable rooms per unit. For less than 3 habitable rooms (the majority of the affordable units), the code requires 1 parking stall. (City of Los Angeles, Department of Building and Safety, 2021)

The proposed Project includes 100% interim affordable housing for people experiencing homelessness. Further, the proposed Project is located approximately 528 feet from

public transit located at Lincoln Blvd. and Washington Blvd. It provides affordable supportive housing for a minimum of 55 years, and generates a significantly lower demand for parking than a market rate residential development. The Project qualifies for bicycle parking, and an affordable housing density bonus. Therefore, a reduced parking ratio for the development is appropriate to apply in this case.

The Project's reduced demand for parking (due to the restricted income levels of the residents and the project site's proximity to public transit), the addition of 15 bicycle parking spaces, and the application of a density bonus for affordable housing supports the Los Angeles zoning code parking ratio. Based on the Los Angeles Department of Building and Safety (DBS), the parking for the 33 affordable units, 9 employees who work in three shifts, and 3 spaces for operations is calculated to be approximately 33 required parking stalls, given its close proximity to major transit stops, (31.5 parking spaces, plus 6 employee and operations parking stalls, minus 4.725 spaces for bicycle parking). Since LAMC 12.22A.25 also applies, only 8.25 parking spaces will be needed.

The Project includes the required 9 spaces and a surplus of 17 parking spaces, for a total of 26 on-site parking spaces, and up to 15 bicycle parking spaces. (PATH, 2020). This is appropriate for 33 interim affordable housing units, 3 employee spaces, and 3 spaces for daily operations. Therefore it is consistent with the Development policies in Chapter 3 of the California Coastal Act, and will not adversely affect coastal parking for coastal visitors.

**2. The permitted development will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act of 1976.**

Since the project conforms to the applicable Community Plan and Specific Plans, and relevant provisions and policies of the Coastal Act, the Project will not prejudice the ability of the City to prepare a Local Coastal Plan in conformity with the Coastal Act and amendments.

**3. The Interpretative Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making the City Engineer's determination.**

As noted in the preceding Sections, the California Coastal Commission's interpretive guidelines (State and Regional) for the Venice area have been reviewed and considered in preparation of these findings and recommendations. However, following prevailing case law (e.g., *Pacific Legal Foundation v. Coastal Commission* (1982) 33 Cal.3d 158), the City Engineer's determination is based on the cited provisions of the California Coastal Act and other legally established laws and regulations.

**4. The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.**

The decision of the permit granting authority, as evidenced in the staff report of this project, has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.

**5. If the development is located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.**

The development is not located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone. The Project site is located approximately 1.3 miles from the Pacific Ocean within an urban area along West Washington Blvd. Therefore, the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.

**6. Any other finding or findings as may be required for the development by the California Environmental Quality Act (CEQA).**

Pursuant to the California Environmental Quality Act (CEQA), the City of Los Angeles City Council found the Project to be a Categorical statutorily exempt on December 10, 2020. There are no additional evaluations required by the California Environmental Quality Act in connection with the approval of this permit.

### **III. PUBLIC COMMENTS**

There were over 200 comments received by the community via verbal comments at the two Hearings that were held for this Project, via emailed, written comments, and via USPS mail. There were five primary Coastal issues the commenters raised concerns about. They are as follows:

#### **PUBLIC ACCESS**

##### **Public Safety**

*Coastal Act § 30210. [M]aximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

This Project removes people from living on the streets into homeless housing, which helps alleviate public safety issues and improves public access, and according the LAPD, the project will not impact the LAPD's ability to fight crime. (Los Angeles Police Department, 2021) Further, it protects public rights, rights of private property owners, and natural resource areas from overuse by beginning to remove encampments that surround the Project site. It places homeless persons into an organized setting managed by a service

provider with counselors, it provides housing and safety and coastal access to the homeless people that already exist in Venice that use the interim housing. This project removes people experiencing homelessness from living on the street and provides them with resources to survive and get the help they need, which is consistent with public safety needs. Moreover, it fosters other important Coastal Act policies, such as to "encourage . . . the provision of new affordable housing opportunities . . . in the coastal zone," which is found in Public Resources Code section 30604(g) and improves public safety by reducing homelessness. So this Project does not create any inconsistency with public safety needs. This Project does not impede public access, but rather facilitates it and does so consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Also, the public safety issues raised by the community already historically existed in Venice. The public comments generally discussed existing public safety issues with the community's existing homeless population. Some commenters stated that the new homeless shelter on Sunset Avenue in Venice caused the existence of homeless people, the shelter caused violence that resulted in calling the police upon occupants of the shelter, and it caused associated safety issues. But, those issues existed before the shelter was built, and they were identified as existing conditions by the neighborhood residents back then, just as they are being raised now with this project involving interim housing. The fact that police assistance was called by the Sunset Avenue shelter's operators shows that the shelter setting was providing managed oversight of the homeless population and addressing safety concerns among the homeless population and the community. Comments then opposing the Sunset Avenue shelter's development pointed to several instances of violence among the homeless living on the streets. It is unlikely that homeless individuals, living in fear on the street with no resources, would be able to call the police for that same help and protection afforded in the shelter setting. The issues raised are not new to Venice. They were not caused by a shelter, and building a homeless shelter did not cause the homeless crisis that is facing this region. Increasing the ability to house the homeless by building shelters and interim housing will support improving the existing homelessness conditions in the Venice area and it will improve safety. It does not cause these issues.

Also, the comments aimed at the Sunset Avenue shelter are not relevant to this type of Project. The interim housing proposed for this project involves 33 beds in 33 individual rooms in a former motel structure that will be managed by a service provider. This project is very different from a congregate 154-bed shelter operated with a large common tent structure at the Sunset Avenue shelter. The safety concerns in a congregate temporary tent shelter setting are not the same and do not exist in this interim housing setting that provides greater privacy and separation of individuals in the program and greater focus on individualized assistance to the participants.

This does not preclude the City of Los Angeles and PATH to report to the Venice Neighborhood Council and the Del Rey Neighborhood Council monthly status reports related to coastal Public Safety needs that directly affect the adjacent neighborhood.

## **Public Safety - Fire Life Safety Design and Operations**

Please refer to the *Public Safety - Fire Life Safety Design and Operations* analysis above in *Section II.C.1., Article 2 - Public Access § 30210*.

## **Protection of Low Cost Visitor Facilities vs. Affordable Housing**

***Coastal Act § 30213.*** *Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.*

As more fully explained in the report, above, the ample supply of low cost motel, hotel, and bed and breakfast accommodations in the Venice area and adjacent Coastal Zone shows that the loss of this underperforming low-cost motel is insignificant to the overall lodging choices in Venice and the adjacent communities within the Coastal Zone.

There is low demand for low-cost lodging in Venice, including this low-cost hotel, since most tourists who visit Venice prefer destination type and boutique brand hotels. For those visitors who do prefer low-budget coastal accommodations, there are options to stay at a bed and breakfast or at other low-budget visitor accommodations in the Coastal Zone communities in and adjacent to Venice for a comparable price. There are ample bed and breakfasts and low-cost motel hotel accommodations in Venice and in other coastal communities directly adjacent to Venice to the north and south, which are also coastal resources. These can be considered to supplement the low-cost visitor recreation accommodation supply in Venice.

Even with the ample low cost motel, hotel, and bed and breakfast accommodations surrounding the Project site, the occupancy rate for California declined approximately 36% in 2020 and is not forecasted to recover for several years (only back to 94% of 2019 levels in 2023). The immediate impact of the COVID-19 pandemic was a 77% decline in 2020 Transient Occupancy Tax revenues – a shortfall that is not recoverable. (Hotel Association Los Angeles, 2021) Tourism spending in California was expected to drop to \$66.1 billion in 2020, erasing a decade of growth. Travel-related spending from visitors is not expected to recover for several years (Domestic visitors 74% of 2019 levels in 2021; International 54%; Leisure 85%; Business-related 56%). Travel-related spending in California is not expected to reach pre-coronavirus levels until 2024. (Visit California, 2021) Average Daily Rate in California is forecast to grow 9% in 2021, following a 24.2% projected decline in 2020. (Visit California, 2021)

Also, under the Los Angeles region's particular COVID-19 constraints on the hotel industry, it is even more speculative to presume there will be a rebound, considering that currently, over a year has passed since the beginning of the COVID-19 pandemic, and the hotel industry is still suffering. In an announcement only as recent as January 25, 2021, the Los Angeles County Public Health Department began allowing occupancy of local hotels and motels for "tourism and individual travel." (Los Angeles County Public Health Department, Jan, 2021) The County's new order provides that hotels "may reopen

out-of-state reservations for non-essential travel,” after meeting certain required COVID-19 protocols that continue to constrain the use of hotels in the Los Angeles region. (Los Angeles County Public Health Department, Jan, 2021) The capacity for the site to remain a visitor and recreational use would not be sustainable. By introducing housing for people experiencing homelessness in Venice, tourism will improve because it would remove homeless people from the streets into interim housing and that helps the efforts to lessen the amount of encampments directly around the Project site.

Data shows that Venice has an ample supply of comparably priced motels, hotels and short term rental properties for temporary accommodations that are also within Council District 11, and within the City of Santa Monica, both located nearby in the Coastal Zone. Further, the visitor preference for higher end and boutique type hotels, ample low cost motel, hotel, and bed and breakfast accommodations in the area shows that the loss of this low-end underperforming motel is insignificant to the overall lodging choices in Venice and the adjacent communities within the Coastal Zone. Therefore, this Project will not negatively affect public access to low cost visitor recreations uses.

Impacts from the Project on low-cost visitor facilities (and other coastal policies identified in this report), if any, by converting one motel into interim housing also needs to be considered in the context of how the Project protects other important coastal resources under the Coastal Act. (Coastal Act section 30007.5.) The Project will provide interim housing for the homeless and it will remove those homeless people from living on the streets. Addressing the homelessness crisis is necessary to protect coastal resources in this area. By doing so, it improves public access and supports the financial viability of other nearby low-cost visitor facilities to continue providing their short-term accommodations by improving coastal access for visitors staying at those accommodations. (Coastal Act Chapter 3, Article 2.) As discussed, above, the Project is consistent with public safety needs because it protects these homeless individuals by placing them into a safer, managed environment with resources to help them. (Coastal Act section 30210.) It also strongly supports the Coastal Act’s broader “important” policy goal of encouraging new affordable housing opportunities in the Coastal Zone for low income persons, and it does so in an existing facility in an existing developed urban area. (Coastal Act section 30604(g).) Since it is within an existing development (not a new development) and it is in an existing urban area, it also fosters maintaining development within an urban and employment center. (Coastal Act sections 30007.5, 30250.) On balance, the Project’s support for these broader important Coastal Act policies is more protective of coastal resources than preventing the conversion of a single specific small and unviable motel in an urban area where there are abundant alternative options for low-cost short-term lodging in the Coastal Zone. (Coastal Act section 30007.5.)

## RECREATION

### Protection of Low Cost Visitor Recreation Uses vs. Affordable Housing

*Coastal Act § 30222. The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for*

*coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.*

Section 30222 is not relevant to this Project because the Project does not involve a “private residential, general industrial, or general commercial development.” Therefore, the prioritization of commercial recreation facilities over other private uses, is not implicated in the City’s Project providing interim housing to the homeless public that are living on City streets since it is not considered a private residential development. Also, potential impacts upon “low cost visitor facilities” from converting this motel to a shelter that provides interim housing for homeless individuals is addressed in the preceding section, above, related to Coastal Act section 30213. As more fully explain above, the ample supply of low cost motel, hotel, and bed and breakfast accommodations in the Venice area and adjacent Coastal Zone shows that the loss of this low-end underperforming motel is insignificant to the overall lodging choices in Venice and the adjacent communities within the Coastal Zone.

The change of use from a low-cost visitor use (a motel) to interim supportive affordable housing is more feasible, and it allows the City to begin to respond to the current emergency homeless crises and the lack of affordable housing in the area surrounding the Project. New affordable housing is the more sustainable, just, and equitable action towards addressing chronic homelessness in the community of Venice and, as noted above, on balance, addressing the homelessness crisis provides more protection for coastal resources by supporting important broader Coastal Act policies that will enhance access and recreation for visitors to the Coastal Zone. Therefore, the Project is consistent with this policy.

## **DEVELOPMENT**

### **Cumulative Impact**

***Coastal Act § 30250(a).*** *New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.*

This Section 30250(a) is not relevant because the Project is not a “new” development, and it does not present any question about where the Project can be located or sited because it involves the re-use of an existing, failed, and defunct motel. Also, it is unquestionably located in an “existing developed area” that is “able” to accommodate it

because it is a former motel that is capable of housing homeless people with interim housing. This same motel was previously temporarily used to house people experiencing homelessness, which shows it is capable of housing homeless people under Project Homekey since it is essentially the same type of program and use as its prior use under the predecessor State program. Because of this, the Coastal Act section 30250 does not require analyzing any cumulative impacts on coastal resources.

Even assuming the Project could be considered new development being sited in an area that is not an “existing developed area able to accommodate it” — all of those presumptions are false —this Project is nevertheless located “where it will not have significant adverse effects, either individually or cumulatively, on coastal resources,” and thus it would comply with this policy from a cumulative standpoint.

Regarding low-cost visitor facilities, the data shows there are many other low-cost accommodations available in Venice and the adjacent coastal communities, and the hotel would have failed to continue to operate regardless of the project.

## **Parking**

***Coastal Act § 30252.** The location and amount of new development should maintain and enhance public access to the coast by (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation.*

As more fully described above related this Report’s analysis of this Coastal Act policy, the parking requirements and needs for this Project are met through the parking available on-site. This Project has more than adequate parking, which thus will not cause any impact to public parking within the Coastal Zone, and thus the Project will not impact coastal access. The proposed Project also improves coastal on-street parking by changing the use of the “under-parked” motel to interim homeless housing that provides adequate parking that complies with the lower parking utilization rates of those who are experiencing homelessness.

Please refer to the Parking analysis above in *Section II.C.1. Article 6 Development – Parking.*

## **Protect Special Communities**

***Coastal Act § 30253.** New development shall do all of the following: (e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.*

Based on the public comments the City received related to Section 30253, it is difficult to discern how this policy applies to this Project. The commenters did not provide an adequate explanation or support for what particular “special communities or neighborhoods” exist and what “unique characteristics” have been affected, or how this

particular Project affected them by failing to protect them. The City only received generalized comments about general homelessness impacting the general Venice area, which does not provide any insight into how this Project fails to protect special communities and neighborhoods under this Coastal Act policy.

As discussed more fully, above, homelessness issues in Venice have long predated this Project and this Project does not cause homelessness. Quite the opposite. This Project removes homeless people from living on the streets. Removing people from the streets into homeless housing unquestionably helps protect special communities and neighborhoods, if such communities and neighborhoods and their unique characteristics are affected by homelessness. The Project allows the City to begin to remove encampments that surround the Project site. It places homeless persons into an organized setting managed by a service provider with counselors, it provides housing and safety; and coastal access to the homeless people that already exist in Venice that use the interim housing. Therefore, this project removes people experiencing homelessness from living on the street, it provides them with resources to survive and get the help they need. Moreover, it fosters other Coastal Act policies such as to “encourage . . .the provision of new affordable housing opportunities . . . in the coastal zone,” which is found in Public Resources Code section 30604(g) and improves public safety by reducing homelessness.

More importantly, this Project involves only the reuse of an existing motel property, and it does not make any change that would impact the architectural “character” of the neighborhood. The Project does not alter the scale or appearance of the existing building relative to the neighborhood’s character, and only involves negligible minor improvements. If anything the Project supports the neighborhood’s existing character by avoiding leaving the property sitting vacant and boarded-up as a former motel.

Assuming that the vicinity of the Project contains special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses, this Project is consistent with the Coastal Act policies protecting such areas.

## **NOTICING**

The noticing was completed for both hearings by mail, posting onsite, and by BOE staff being available virtually online for the community’s convenience to access project information. Also, a Project website was created that provided access to the Project’s Hearing Notices, CDP Application, Staff Report, and Notice of Exemption. A second hearing was conducted to correct a gap in the mailing radius and additionally provide ample opportunity to the community to comment on the Project.

## **Posting**

The site was posted within 3 days of Hearing #1 and #2 in a conspicuous place for both hearings, with a notice easily read by the public on the property site and containing specific information as to the nature of the proposed development. Staff found that all Hearing Notices for Hearing #1 were vandalized by ripping them off the side of the building

after they were posted. So, for the Hearing Notice #2 posting, an additional posting was placed on a sign behind a chain link fence to protect it from vandalism. BOE Homeless Program Staff's email contact information was included on the notices, so the community or any interested party could conveniently contact BOE Staff if they had any questions or concerns. Posting photos are attached. This satisfies this requirement for posting the Project site.

## **Mailing**

Hearing Notice #1 was mailed within 10-days of Hearing #1, to a list containing the name and address of each property owner, within one hundred feet from the front lot of the proposed development. The gap in mailing addresses was correct by scheduling a second hearing immediately. The second hearing was done because the mailing list was 100-ft from the front lot boundary. Hearing Notice #2 was mailed within 10-days of Hearing #2, to each property owner within one hundred feet from each boundary of the site of the proposed development. This satisfies this requirement for mailing notices to neighboring addresses of the Project site.

## **Virtual**

Due to COVID-19 restrictions, BOE Staff telecommute and work from home through virtual accessibility. BOE staff was available, virtually, online which allowed for the public to easily access Project information in preparation for the hearings. This ensured the community had continued access to BOE staff and allowed the Project information to be effectively communicated to the public.

These virtual elements included the following:

1. The Project Website address was created for a central virtual depository of Project documents. BOE Staff created the site with the intention to provide our constituents the ability to conveniently access Project files while they wrote their Responses to Comments.

### **Here is the Project's Website Address:**

<https://eng.lacity.org/RamadaInnMarinaHomelessShelterCDP>

2. February 1, 2021, Hearing Notice #2 was sent by email to all participants of Hearing #1. Hearing Notice #2 contained BOE Staff email contact information for the community's convenience and consideration.

## **Hearing Notice #2**

*To Whom It May Concern:*

*Thank you for your interest in the Ramada Inn Marina Interim Housing Project's Coastal Development Permit hearing. Your comments are appreciated.*

*Please see the attached Public Hearing Notice #2 for your reference.*

*Here is digital access or your convenience and consideration:*

**Hearing Date, Time, and Location:** *This notice is for a public hearing scheduled for **February 11, 2021** beginning at 3:00 PM and to be held via Zoom webinar for the Ramada Inn Marina Homeless Shelter Coastal Development Permit.*

*Please click the link below to join the webinar:*

<https://www.zoomgov.com/j/1602707432>

*Passcode: 875893*

*Or Telephone:*

*Dial (for higher quality, dial a number based on your current location):*

*US: +1 669 254 5252 or*

*+1 669 216 1590 or*

*+1 551 285 1373 or*

*+1 646 828 7666 or*

*833 568 8864 (Toll Free)*

**Webinar ID: 160 270 7432**

*Also, please visit the Project's website for more information.*

<https://eng.lacity.org/RamadaInnMarinaHomelessShelterCDP>

*Code (LAMC) § 12.20.2 applies to projects within the California Coastal Zone. The first public hearing for this Project was held on Friday, January 29, 2021 at 3:00 pm via Zoom.*

**Project Description:** *The project proposed under CDP 21-01 includes the acquisition of an existing two-story 12,220-square foot (sf) motel that will be initially rehabilitated to a crises and bridge housing homeless shelter; then in the long term, it will eventually become permanent homeless supportive housing. The Project includes minor tenant improvements to the existing interior and exterior to accommodate American with Disabilities Act (ADA) standards; including hearing and vision impaired upgrades, path of travel improvements, and life and safety upgrades, to an existing motel building.*

*Interested persons, as well as the applicant may speak at the hearing or submit written information. **All written comments must be received on or before 4:00 PM on Friday, February 12, 2021 to be considered, prior to a decision on the case.** Written comments should be sent by email to: [Eileen.Schoetzow@lacity.org](mailto:Eileen.Schoetzow@lacity.org), or delivered, or mailed to:*

*City of Los Angeles Department of Public Works  
Bureau of Engineering, Environmental Management Group  
Attention: Eileen Schoetzow Environmental Supervisor I*

1149 S. Broadway, Suite 600, Mail Stop 939  
Los Angeles, CA 90015-2213

*The application, exhibits and other information relating to the case are available for your review at 1149 S. Broadway, Suite 600, Los Angeles, CA 90015-2213 in the Office of the Environmental Management Group. If you have any questions, please contact at Eileen Schoetzow at via email at [Eileen.Schoetzow@lacity.org](mailto:Eileen.Schoetzow@lacity.org) or at (213) 485-5751.*

3. February 5, 2021, An email was sent *RE: Comment Period for Ramada Inn Marina Interim Shelter Project CDP Clarification*. This was because there was a gap in the comment period between Hearing #1 and Hearing #1. This email communicated to our constituents that the comment period would be extended one more week for their convenience until the day after Hearing #2. This provided the community with more time to prepare their comments.

*Good day,*

*For your information, we are conducting an additional hearing to accommodate as many comments from the community.*

*Even though the comment period ended February 4th at 4pm per the first hearing, we will continue to allow comments up until the end of the comment period of the second notice. For your convenience and consideration we are accepting comments up until February 12th @ 4pm.*

*Please see the Project website for the Hearing Notice #2.  
<https://eng.lacity.org/RamadaInnMarinaHomelessShelterCDP>*

*Thank you for your interest in this Project,*

4. February 11, 2021, *Public Testimony Guidelines* were emailed to all commentors that emailed BOE up until that day at 1:00 pm. The purpose of this was to provide participants with clear guidance on how the ZOOM hearing would be conducted. BOE Staff was able to review lessons learned from Hearing #1 and enhance the community's ability to comment efficiently during Hearing #2. We shared our Project web address again for everyone's convenience.

### **Public Testimony Guidelines**

The Bureau of Engineering would like to provide our constituents Public Testimony Guidelines for today's Coastal Development Permit Hearing.

Please follow the following guidelines during the ZOOM hearing:

- Make sure you have signed in

For your convenience, there will be two ways to access the sign in sheet:

1. Via the Project Website

<https://eng.lacity.org/RamadaInnMarinaHomelessShelterCDP>

2. Via the ZOOM chat box

- Use the "raise your hand" function in ZOOM or press \*9 on your phone to make a verbal comment
- When speaking state your first and last name for the record
- You will get 3 minutes to make your comments, with a 1 minute warning
- After the public hearing, written comments can also be sent to Eileen.Schoetzow@lacity.org by Friday, February 12, 2021 @ 4pm.

#### **IV. STANDARD CONDITIONS OF APPROVAL**

Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the City Engineer's Office.

Expiration. If development has not commenced, the permit will expire two years from the permit date as reported from the Coastal Commission.

Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

Interpretation. Any questions of intent or interpretation of any condition will be resolved by the City Engineer.

Assignment. The permit may be assigned to any qualified person, provided assignee files with the City Engineer an affidavit accepting all terms and conditions of the permit.

Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the City Engineer and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

#### **V. CONDITIONS OF APPROVAL**

1. PATH shall provide the following elements for operations:

- Install and thereafter maintain a rear barrier along Harrison to provide better control over access to the Project via Washington.
- PATH staff on-site
- Overnight security guards located on-site
- Security cameras
- Community hotline
- HMIS will assist residents to find permanent housing and homeless services

#### **VI. STAFF RECOMMENDATIONS**

Based on the preceding analysis and the comments received prior to, during and after



FIGURE 1 – PROJECT LOCATION MAP  
3130 WASHINGTON BLVD, VENICE, CA 90292



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