

NOTICE OF EXEMPTION

To: <u>X</u> Office of Planning and Research PO Box 3044, Room 113 Sacramento, CA 95812 – 3044 state.clearinghouse@opr.ca.gov	From: County of Los Angeles Department of Health Services 238 East 6 th Street Los Angeles, CA 90014
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PROJECT TITLE: Willow Tree Permanent Supportive Housing Project	PROJECT APPLICANT: The People Concern
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PROJECT LOCATION – Specific: 1919 W Artesia Boulevard, Compton, CA 90220

PROJECT LOCATION – City: Compton	PROJECT LOCATION – County: Los Angeles
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DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The Willow Tree Permanent Supportive Housing Project (proposed Project), located in the City of Compton, California, at 1919 West Artesia Boulevard, would convert an existing interim housing facility to a permanent supportive housing facility. On December 20, 2022, the Los Angeles County Board of Supervisors, acting on behalf of the County of Los Angeles, authorized the Department of Health Services to issue funding for the Project. The proposed facility would provide housing units for persons experiencing homelessness (PEH) or individuals who are at risk of homelessness. This would require minor interior and exterior renovations consisting of upgrading and/or replacing an existing chain link fence; replacing parking lot asphalt, reducing vehicle parking from 68 spaces to 58 and adding bicycle parking (51 long-term and 11 short-term); replacing concrete walkways to meet Americans with Disabilities Act requirements, installing a new heating and ventilation system; replacing windows, drywall, and ceiling wood beams; adding a kitchenette to each housing unit; improving site drainage; replacing water system piping; and installing a fire alarm system. The proposed Project would also relocate an existing transformer, install electric vehicle charging stations for two parking spaces and electric vehicle charging conduit for seven parking spaces, and install a new building identification sign. No new landscaping would be added, but any damage to irrigation lines and/or existing landscaping that occurs during Project implementation would be repaired.

The existing Willow Tree Interim Housing facility can accommodate 100 residents, with each housing unit limited to a single occupant. The existing facility operated at 100% occupancy between November 2000 and February 2022. Under the proposed Project, the Willow Tree Permanent Supportive Housing facility would also accommodate 100 residents. Each housing unit would be restricted to individual occupants with an income that is a maximum of 30% of the median income in the City of Compton. To ensure affordability of the housing units, residents would be required to pay rent at a rate that is no more than 30% of their income. The facility would be subject to a covenant requiring that it remain affordable for a 55-year term.

Willow Tree Interim Housing Facility currently employs 41 individuals. This would be reduced to 9 staff positions under the proposed Project. The People Concern is the Project sponsor and would serve as both the developer and the facility operator. There would be no increase in the occupancy capacity of the facility. Operational activities would be slightly reduced due to the reduction in the number of onsite employees.

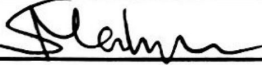
NAME OF PUBLIC AGENCY APPROVING PROJECT: County of Los Angeles, Department of Health Services
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NAME OF PERSON OR AGENCY CARRYING OUT PROJECT: The People Concern
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EXEMPT STATUS: _____ Ministerial (Sec. 21080(b)(1); 15268). _____ Declared Emergency (Sec 21080(b)(3); 15269(a)) _____ Emergency Project (Sec 21080(b)(4); 15269(c)) <u> X </u> _____ Categorical Exemption (Class 1 Existing Facility, State CEQA Guidelines Section 15301 (a), (d), (f), and (h), and LA County Environmental Document Reporting Procedures and Guidelines Appendix G [County Guidelines] Class 1 subsections (c), (d), (i), (j), and (m); Class 2 Replacement or Reconstruction, State CEQA Guidelines Section 15302 (c) and County Guidelines Class 2 subsections (b) and (e); Class 3 New Construction or Conversion of Small Structures, State CEQA Guidelines Section 15303 (d) and (e) and County Guidelines Class 3 subsections (a) and (b); Class 4 Minor Alterations to Land, State CEQA Guidelines Section 15304 (f) and County Guidelines Class 4 subsections (c) and (k); and Class 11 Accessory Structures, State CEQA Guidelines Section 15311 (a) and (b) and County Guidelines Class 11 subsections (d) and (f)) <u> X </u> _____ Statutory Exemption (Section 21080.50 Interim motel housing, including supportive housing)
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REASONS WHY PROJECT IS EXEMPT: See Attachment A, which is incorporated herein.

LEAD AGENCY CONTACT PERSON: Deborah Lever, Department of Health Services, Housing for Health Program Manager; Telephone: 310.569.5001

Signature: 	Date: <u>12/20/22</u>	Title: <u>Director of Housing for Health</u>
<u> X </u> Signed by Lead Agency		
_____ Signed by Applicant		
Authority cited: Sections 15300 and 15301, California Code of Regulations Title 14, Division 6, Chapter 3	Date Received for filing at OPR: <u>12/21/2022</u>	

ATTACHMENT A
Supporting Information for
Willow Tree Permanent Supportive Housing Project Notice of Exemption
County of Los Angeles Department of Health Services

The Los Angeles County, Department of Health Services (DHS), acting on behalf of the County of Los Angeles (County), pursuant to the requirements of the California Environmental Quality Act (CEQA) for the approval of funds for the Willow Tree Permanent Supportive Housing Project (proposed Project), has reviewed the proposed Project and determined that it complies with the requirements for a Statutory Exemption under Public Resources Code Section 21080.50 and for several Categorical Exemptions covered under Article 19 of the State CEQA Guidelines (California Code of Regulations Title 14. Natural Resources, Division 6. Resources Agency, Chapter 3: Guidelines For Implementation of The California Environmental Quality Act). The County's Environmental Document Reporting Procedures and Guidelines, Appendix G (County Guidelines) include Categorical Exemptions that are the same as or similar to many of the Categorical Exemptions established in the State CEQA Guidelines. The following discussion demonstrates the Project's consistency with the applicable Statutory and Categorical Exemptions.

Statutory Exemption Section 21080.50: Public Resources Code Section 21080.50 states that CEQA does not apply to a project that would convert "a structure with a certificate of occupancy as a motel, hotel, residential hotel, or hostel to supportive or transitional housing," provided that the project does not result in an "expansion of more than 10% of the floor area of any individual living unit" and the project does not "result in any significant effects relating to traffic, noise, air quality, or water quality."

The Project building was originally constructed in 1972 as a motel and operated as a motel until 2020, when it was converted to the existing Willow Tree Interim Housing Facility. The proposed Project involves minor repair, renovation, maintenance, and upgrades to the existing building and property. None of the improvements would result in an increase in the floor area of any of the living units or any expansion of the existing building. Further, the Project would continue the existing residential nature of the property at the same total occupancy capacity as currently exists. The Project would not result in any significant effects relating to traffic and air quality because it would not increase the occupancy capacity of the facility, and the number of staff would decrease relative to existing conditions, which would decrease traffic and related air pollutant emissions associated with the property. Vehicle parking would be reduced from 68 spaces to 58 and electric vehicle charging infrastructure and bicycle parking would be added. The Project would not change the residential nature of the property and would not introduce any new stationary equipment that could generate noise, thus it would not result in any significant effects related to noise. The Project would upgrade the existing stormwater drainage infrastructure and would not increase the amount of impervious surfaces within the property or introduce any new point-sources or non-point sources of water pollution, thus it would not result in any significant effects related to water quality.

Categorical Exemption Class 1: State CEQA Guidelines Section 15301 states that Categorical Exemption "Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use." Examples of projects within this Class include "(a) interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances;" "(d) restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety" where damage did not result from an environmental hazard; "(f) addition of safety or health protection devices" in conjunction with existing structures; and "(h) maintenance of existing landscaping." The County Guidelines define the Class 1 exemption as "the operation, repair, maintenance, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that previously existing," and note examples of projects within this Class as including "(c) Restoration and repair of buildings, structures, equipment and appurtenances required because of accumulated maintenance not performed;" "(d) Interior and exterior alterations of buildings involving such things as ... installation of plumbing and electrical conveyances, and heating and refrigeration systems;" "(i) addition of safety or health protection devices" in conjunction with existing structures; "(j) maintenance of and minor alterations to existing landscaping;" and "(m) Security fencing and gates."

The proposed Project involves minor repair and maintenance of the existing Willow Tree Interim Housing facility, including replacing or installing the following features: fencing; parking lot and concrete surfaces; mechanical equipment including heating and ventilation system, water system piping, a fire alarm system, and electric vehicle charging stations; kitchenettes in each housing unit; building materials such as windows, drywall, and ceiling beams; and storm drainage infrastructure. It also includes restoration of existing landscaping if it is damaged during Project implementation. The existing facility can accommodate 100 residents. There would be no increase in the occupancy capacity of the facility, which operated at 100% occupancy between November 2020 and February 2022. Operational activities would be slightly reduced due to the reduction in the number of onsite employees.

Categorical Exemption Class 2: State CEQA Guidelines Section 15302 states that Categorical Exemption “Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.” One example of projects within this Class is “(c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.” The County Guidelines provide the same description of the Class 2 exemption and note examples of projects within this Class as including “(b) Replacement of old, deteriorated or damaged sewers, storm drains, or water mains with new structures of substantially the same purpose and capacity as the structure replaced,” and “(e) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.”

The proposed Project involves replacement or reconstruction of several components of the existing Willow Tree Interim Housing facility, including fencing; building identification sign; parking lot and concrete surfaces; mechanical equipment including heating and ventilation system, water system piping, and an electrical transformer; building materials such as windows, drywall, and ceiling beams and adding kitchenettes to each housing unit; and storm drainage infrastructure. The Project would not change the existing residential nature of the property and would not increase the capacity of the facility or the capacity of any of the public service and utility infrastructure within the Project site.

Categorical Exemption Class 3: State CEQA Guidelines Section 15303 states, in part, that Categorical Exemption “Class 3 consists of construction and location of limited numbers of new, small facilities or structures; [and] installation of small new equipment and facilities in small structures.” Examples of the types of projects within this Class include “(d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction” and “(e) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.” The County Guidelines define a Class 3 exemption, in part, as “construction and location of limited numbers of new small facilities or structures,” and include examples “(a) Water main, sewer, and storm drain extensions of reasonable length to serve new construction,” and “(b) Accessory (appurtenant) structures such as garages, carports, patios, cabanas, swimming pools, screens, windbreaks, fences, parking attendant and golf starter structures, and comfort stations.”

The proposed Project involves construction and/or installation of small facilities, structures, and small new equipment, specifically replacement fencing and mechanical equipment including a heating and ventilation system, water system piping, and storm drainage infrastructure; and new electric vehicle charging stations on two parking spaces and electric vehicle charging conduit for seven parking spaces, bicycle parking, and building identification sign; and relocating an electrical transformer.

Categorical Exemption Class 4: State CEQA Guidelines Section 15304 states that Categorical Exemption “Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees.” One of the examples of this Class is “(f) Minor trenching and backfilling where the surface is restored.” The County Guidelines define a Class 4 exemption as “minor public or private alterations to the condition of land, water and/or vegetation which do not involve the removal of mature scenic trees except for forestry and agricultural purposes,” and include examples “(c) New gardening or landscaping” and “(k) Trenching or backfilling where the surface is restored.”

The proposed Project involves minor alterations in the condition of land, including minor trenching and backfilling the surface to facilitate replacing, upgrading, or installing the following features: fencing; parking lot and concrete surfaces; water system piping and storm drainage infrastructure; electric vehicle charging stations at two parking spaces and electric vehicle charging conduit for seven parking spaces; bicycle parking; and an electrical

transformer. No trees would be removed as part of the proposed Project. No new landscaping would be added, but any damage to irrigation lines and/or existing landscaping that occurs during Project implementation would be repaired.

Categorical Exemption Class 11: CEQA Guidelines Section 15311 states that Categorical Exemption “Class 11 consists of construction, or placement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities.” Examples of this Class include “(a) On-premise signs” and “(b) Small parking lots.” The County Guidelines provide the same description of the Class 11 exemption and include the following examples “(d) Erection of informational or directional on-premise signs,” and “(f) Small parking lots and landscaping.”

The proposed Project includes upgrading the existing parking lot and concrete surfaces to serve the existing building. Vehicle parking would be reduced from 68 spaces to 58 and bicycle parking would be added. Accessory structures and improvements would include installing electric vehicle charging stations for two parking spaces and installing electric vehicle charging conduit for seven parking spaces; installing bicycle parking; constructing a new building identification sign; and relocating an existing electrical transformer. No new landscaping would be added, but any damage to irrigation lines and/or existing landscaping that occurs during Project implementation would be repaired.

Exceptions to Use of a Categorical Exemption: The CEQA Guidelines Section 15300.2 defines exceptions that prohibit the use of a categorical exemption. The County Guidelines include qualifications to use of a categorical exemption that are similar to items a, b, and c from the State CEQA Guidelines, as discussed below. The proposed Project would not trigger any of these exceptions, as follows:

- a. **Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of the environmental sensitivity of the project site. These classes may not apply where a project could impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The Project site is fully developed with structures, asphalt and concrete surfaces, and limited ornamental landscaping. The site does not contain any aquatic resources or natural habitat features.

A Historic Resource Assessment was completed to evaluate the potential for the site to support significant historical resources (Dudek 2022). Based on a review of historic aerial photographs, the evaluation found that the site supported a lattice tower-style oil drilling derrick from at least 1928 to sometime between 1947 and 1963 and the current building was constructed in 1972. Given the types and length of time of disturbance to the site, the site has a low potential to support any surface level or subsurface archeological resources. Further, the Project involves a limited extent of ground disturbance and trenching. As with all land use development projects in California, there is a potential for earthwork activities conducted as part of the Project to uncover archaeological resources. If this were to occur, state law requires that all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist can evaluate the significance of the find and determine whether additional study is warranted.

The Project site does not support any officially designated and/or precisely mapped environmental resources of hazardous or critical concern. Thus, this exception does not apply to the Project.

- b. **Cumulative Impact.** All categorical exemptions are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The Project site is located in an urbanized area that began developing in the 1960s. The site and adjacent areas are not known to contain any unique environmental resources. The proposed Project would not change the residential nature of the Project site and would not increase the occupancy capacity or otherwise increase the intensity of land use within the site. There are no undeveloped parcels adjacent to or proximate to the Project site. There are no other active development or redevelopment projects in proximity to the site and no other active development or redevelopment projects of a similar type as the proposed Project within the City (City of Compton 2022). Thus, no cumulative impacts are anticipated as a result of successive projects of the same type or in the same place as the proposed Project and this exception does not apply to the Project.

- c. Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The Project site is located in an urbanized area that began developing in the 1960s. The site and adjacent areas are not known to contain any unique environmental resources. Thus, there is nothing unusual about the Project site or surrounding area and there is nothing unusual about the types of site improvements included in the proposed Project that could result in a significant effect on the environment due to unusual circumstances. The Project would continue the existing residential use of the property and would not increase occupancy capacity. Therefore, there is no reasonable possibility that the proposed Project would have a significant effect on the environment due to unusual circumstances, and this exception does not apply to the Project.

- d. Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources including, but not limited to, trees, historic buildings, rock outcroppings or similar resources, within a highway officially designated as a state scenic highway.

The Project site is not visible from any officially designated scenic highway. The nearest scenic highway is State Route 1/East Pacific Coast Highway in the City of Long Beach, approximately eight miles southeast of the Project site. The scenic designation applies to the segment of East Pacific Coast Highway beginning at the traffic circle where this road intersects with North Lakewood Boulevard and extending to the southeast (Caltrans 2018). Therefore, this exception does not apply to the Project.

- e. Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code.

According to the California State Water Resources Control Board Geotracker database and the California Department of Toxic Substances Control Envirostor database, there are no active hazardous materials sites within or adjacent to the Project site. Thus, the proposed Project is not located on a site where hazardous materials or hazardous waste have been identified, nor is it located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code (SWRCB 2022, DTSC 2022). As such, no hazardous conditions are known to exist on the site and this exception does not apply to the Project.

- f. Historical Resources. A categorical exemption shall not be used for a project that may cause a substantial adverse change in the significance of a historical resource.

A Historic Resources Assessment was completed to evaluate the potential for the Project site to support significant historical resources (Dudek 2022). This report found that there are no historical resources within or adjacent to the Project site and that the Project would have no effect on historical resources. Thus, this exception does not apply to the Project.

REFERENCES

- California Department of Transportation (Caltrans). 2018. State Scenic Highway Map.
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>
a. Accessed April 8, 2022.
- California Department of Toxic Substances Control (DTSC). 2021. Envirostor.
<https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=1919+W+Artesia+Blvd%2C+Compton%2C+CA+90220>. Accessed April 8, 2022.
- City of Compton, Community Development Department. 2022.
<http://www.comptoncity.org/depts/cd/default.asp>. Accessed April 8, 2022.
- Dudek. 2022. Historic Resources Assessment. May 2022.
- State Water Resources Control Board (SWRCB). GeoTracker.
<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=1919+W+Artesia>. Accessed April 8, 2022.