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6 Attorneys for Plaintiffs

7
8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES
10 UNLIMITED JURISDICTION

11 VENICE KIDS COUNT, an unincorporated
12 association; HEIDI ROBERTS, an individual;
and KATRINA GLUSAC an individual,

13 Plaintiffs

14 vs.

15
16 CITY OF LOS ANGELES, a municipal
17 corporation, DOES 1 through 50, inclusive,

18 Defendants
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Case No.:

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VERIFIED COMPLAINT FOR
DECLARATORY RELIEF

1 Plaintiffs VENICE KIDS COUNT, HEIDI ROBERTS and KATRINA GLUSAC
2 (“Plaintiffs”) allege as follows:

3 PARTIES

4 1. At all times relevant hereto, Plaintiff Venice Kids Count is and was a duly
5 organized California unincorporated association. Venice Kids Count is comprised of citizens,
6 residents and taxpayers of Defendant City of Los Angeles whose members have beneficial
7 interests in and title to real properties situated adjacent to and in the immediate neighborhood
8 surrounding Westminster Park, and who are recreational users of Westminster Park, a public park
9 which is improved with a senior citizens’ center located at 1234 Pacific Avenue, Venice,
10 California, 90291, in the City of Los Angeles, County of Los Angeles.

11 2. Westminster Park is located in a residential neighborhood, and in the vicinity of
12 and immediately adjacent to numerous schools, including Westminster Elementary School,
13 attended by approximately four hundred children under the age of eleven; Westminster Avenue
14 Early Education Center, attended by approximately 50 children; and Ecole Claire Fontaine Pre-
15 school which serves approximately forty children from two to six years of age.

16 3. At all times relevant hereto, Plaintiff Heidi Roberts (“Roberts”) is and was an
17 individual residing within approximately one-tenth (.1) mile of Westminster Park, where she
18 resides with her family. Roberts and her family, including her 11 year old child, have used and
19 regularly do use Westminster Park for recreational purposes, including flying drones, driving
20 radio cars, throwing balls and using the dog park and grass area lot. Roberts is taxpayer to the
21 City of Los Angeles. Provided the close proximity of her home to Westminster Park, and her use
22 thereof, Roberts has a direct and beneficial interest in the use of Westminster Park for public park
23 and recreation purposes.

24 4. At all times relevant hereto, Plaintiff Katrina Glusac (“Glusac”) is and was an
25 individual residing within approximately three-quarters (.75) mile of Westminster Park, a
26 recreational user of Westminster Park whose five year old child attends Westminster Elementary
27 School, and a taxpayer to the City of Los Angeles. Glusac and her child regularly use Westminster
28 Park for recreational purposes. Provided the close proximity of her home to Westminster Park,

1 and her use thereof, Glusac has a direct and beneficial interest in the use of Westminster Park for
2 public park and recreation purposes.

3 5. At all times relevant hereto, Defendant City of Los Angeles (“City”) is and was a
4 municipal corporation, organized and existing under the laws of the state of California, located
5 within the County of Los Angeles. The City, including all of its departments, have the duty and
6 responsibility to proceed in accordance with law, provide due process and ensure that all land use
7 approvals and determinations comply with all applicable laws.

8 6. Plaintiffs are ignorant of the true names and capacities of Defendants sued herein
9 as DOES 1-50, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiffs
10 will amend this Complaint to allege the true names and capacities of fictitiously named
11 Defendants when ascertained.

12 7. Plaintiffs are informed, believe and based thereon allege that at all times herein
13 mentioned, Defendants, including DOES 1-50, and each of them, were the agents and employees
14 of the City, and the acts complained of herein were done within the course and scope of said
15 agency, and employment.

16 GENERAL ALLEGATIONS

17 Westminster Park

18 8. Plaintiffs are informed and believe and based thereon allege that in or about 1949
19 or 1950, the City filed a lawsuit in the Superior Court of California, County of Los Angeles, for
20 condemnation, entitled *The City of Los Angeles v. Keliel M. Erem et al.*, Case Number 579.240
21 (the “Condemnation Action”).

22 9. Plaintiffs are informed and believe and based thereon allege that on or about June
23 14, 1950, the Superior Court entered judgment in favor of the City and against the defendants in
24 the Condemnation Action, which was entered in Book 2166, Page 126 of Judgments, and that all
25 compensation ordered to be paid to defendants in the Condemnation Action was paid.

26 10. Plaintiffs are informed and believe and based thereon allege that on or about July
27 5, 1950, the Court issued a Final Order of Condemnation (“Condemnation Order”) whereby the
28 real property on which Westminster Park is located was condemned in fee to the City with use of

1 the property being restricted to use of the public and dedicated to such public use **for public**
2 **playground and recreation purposes.**

3 11. Plaintiffs are informed and believe and based thereon allege that the
4 Condemnation Order was recorded on or about July 12, 1950 as Document Number 2714 in the
5 Official Records of the County of Los Angeles. A true and correct copy of the Condemnation
6 Order is attached hereto as Exhibit 1 and made part hereof.

7 12. Plaintiffs are informed and believe and based thereon allege that in or about 1973,
8 the City's Department of Building & Safety issued a Certificate of Occupancy for a new senior
9 citizens' center at Westminster Park. A true and correct copy of this Certificate of Occupancy is
10 attached hereto as Exhibit 2 and made part hereof.

11 13. Plaintiffs are informed and believe and based thereon allege that from
12 approximately 1973 until mid-2009, the City operated the senior citizens' center at Westminster
13 Park as a senior citizen's center.

14 14. Plaintiffs are informed and believe and based thereon allege that in or about mid-
15 2009, all senior citizens' center programs were cancelled, and the senior citizens' center remained
16 open only sporadically for the use of park users.

17 15. Plaintiffs are informed and believe and based thereon allege that in May, 2016, the
18 senior citizens' center was closed.

19 Proposed Homeless Storage Center

20 16. Plaintiffs are informed and believe and based thereon allege that the City now
21 intends to use the existing senior citizens' center at Westminster Park as an on-site storage area
22 and services center for use by homeless individuals instead of "public playground and recreation
23 purposes," as required in the Condemnation Order.

24 17. On or about April 13, 2016, Councilmember Mike Bonin, the Councilmember for
25 the 11th District where Westminster Park is located, made a motion that the Department of
26 Recreation and Parks be requested to authorize the use of the existing senior citizens' center at
27 Westminster Park to "provide free storage opportunities" for residents experiencing
28 homelessness; and that the City Administrative Officer identify sufficient funding to manage the

1 day to day operation for said homeless storage services center. Councilmember Bonin’s motion
2 passed. A true and correct copy of Bonin’s April 13, 2016 Councilmember Motion is attached
3 hereto as Exhibit 3 and made part hereof.

4 18. On or about June 13, 2016, the City’s Bureau of Engineering/Department of Public
5 Works sent “Interdepartmental Correspondence” to Michael Shull, General Manager of the
6 Department of Recreation and Parks, advising that the City planned to convert the use of the
7 senior citizens center to a homeless services and storage center that would be administered by a
8 local non-profit organization. A true and correct copy of the June 13, 2016 “Interdepartmental
9 Correspondence” is attached hereto as Exhibit 4 and made part hereof.

10 19. On or about August 10, 2016, Department of Recreation and Parks’ Board of
11 Recreation and Park Commissioners approved the conversion of the senior citizens’ center at
12 Westminster Park to an on-site storage area and services center for use by homeless individuals.
13 A true and correct copy of the August 10, 2016 Approval (without voluminous exhibits) is
14 attached hereto as Exhibit 5 and made part hereof.

15 20. On or about August 11, 2016, the City filed with the County of Los Angeles a
16 Notice of Exemption from the California Environment Quality Act, admitting that it was
17 converting the senior citizens center at Westminster Park to a homeless storage and services center
18 for the storage of personal belongings of homeless persons. In the Notice of Exemption, the City
19 states that the beneficiaries of the project at Westminster Park would be the homeless individuals
20 in the Venice area. A true and correct copy of the Notice of Exemption is attached hereto as
21 Exhibit 6 and made part hereof.

22 21. On or about September 13, 2016, the City’s Department of Building and Safety
23 issued a building permit, Building Permit No. 16016-10000-12896, “for interior and exterior
24 modifications to an existing “senior citizens center,” including upgrading two restrooms to
25 comply with accessibility requirements, relocating an accessible parking stall and revise path of
26 travel” (“the Building Permit”). A true and correct copy of the Building Permit is attached hereto
27 as Exhibit 7 and made part hereof.

1 22. Plaintiffs are informed and believe and based thereon allege that the Building
2 Permit falsely represents that there would be no change in use to the existing senior citizens
3 center. Indeed, the Building Permit purports to change the use of the existing senior citizens center
4 to a homeless storage and services center for the storage of personal belongings of homeless
5 persons.

6 23. Plaintiffs are informed and believe and based thereon allege that the City intends
7 to start operation of the proposed homeless storage and services center on or about November 1,
8 2016.

9 24. Plaintiffs are informed and believe and based thereon allege that the use of the
10 senior citizens center at Westminster Park on-site as a storage area and services center for use by
11 homeless individuals would negatively impact, and cause severe harm to the surrounding
12 community including the children who attend Westminster Elementary School and Ecole Claire
13 Fontaine Pre-school.

14 25. In fact, on August 17, 2016, the Venice Neighborhood Council, an advisory body
15 of City government the purpose of which under the City Charter and Municipal Code is to advise
16 City officials on pending issues and projects, voted to oppose the conversion of the existing senior
17 citizens center at Westminster Park to a homeless storage and services center.

18 26. Unless the City is restrained and enjoined from using Westminster Park for a
19 homeless storage and services center for the storage of personal belongings of homeless persons,
20 Plaintiffs will suffer irreparable harm that cannot be compensated by monetary damages.

21 27. On multiple occasions, including through counsel, Plaintiffs have brought the
22 prohibitions of the Condemnation Order to the City's attention. The City has ignored Plaintiffs',
23 and Plaintiffs' counsel's, requests to abide by the Condemnation Order.

24 28. Plaintiffs contend that the Condemnation Order precludes the City from using
25 Westminster Park for any purpose other than as a public playground and/or recreation purposes
26 as set forth in the Condemnation Order.

27 29. Plaintiffs further contend that a homeless storage and services center for the
28 storage of personal belongings of homeless persons is inconsistent with and violative of the

1 Condemnation Order. Accordingly, the City is prohibited from using any portion of Westminster
2 Park as a homeless storage and services center.

3 30. Plaintiffs are informed and believe and based thereon allege that the City contends
4 in all respects to the contrary.

5 31. A judicial declaration is necessary and appropriate under the circumstances so that
6 the parties' rights, duties and obligations can be determined.

7 32. Plaintiffs have incurred and will incur attorneys' fees for seeking this judicial
8 action and this action will benefit by the public interest by requiring the City to comply with the
9 recorded Condemnation Order, a duly issued Court Order. Based thereon, Plaintiffs are entitled
10 to recovery of attorneys' fees pursuant to California *Code of Civil Procedure* §1021.5.

11 WHEREFORE, Plaintiffs pray for judgment as follows:

12 1. For a determination that pursuant to the Condemnation Order, the only permitted
13 use of Westminster Park is as a public playground and/or for recreation purposes;

14 2. For a determination that the proposed use of Westminster Park as a homeless
15 storage and service center violates the permitted use of the Condemnation Order;

16 3. For a Temporary Restraining Order, Preliminary Injunction and Permanent
17 Injunction restraining and enjoining City from any change of use of Westminster Park, including
18 its buildings, to a homeless storage and service center or any uses other than as a public
19 playground and recreation uses;

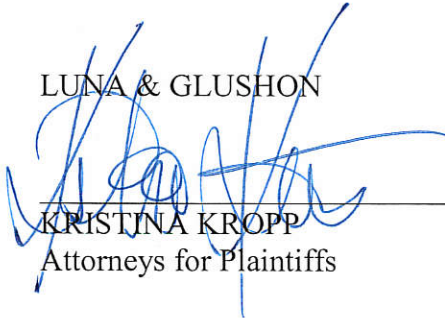
20 4. For attorney's fees as afforded by law;

21 5. For costs incurred; and

22 6. For such other and further relief as the Court deems just and proper.

23
24 Dated: October 4, 2016

LUNA & GLUSHON

25
26 
27 KRISTINA KROPP
28 Attorneys for Plaintiffs

VERIFICATION

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I, HEIDI ROBERTS, have read the foregoing VERIFIED COMPLAINT FOR DECLARATORY RELIEF and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in the foregoing document are true to my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner _____ a managing member of _____ VENICE KIDS COUNT, a California unincorporated nonprofit association, a party to this action and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed this 4th day of October, 2016, at Venice, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

VENICE KIDS COUNT

By: 
HEIDI ROBERTS
President

Exhibit 1

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RAY L. CHESEBRO, City Attorney
400 City Hall, Los Angeles
Michigan 8311

and CHARLES F. REICHE,
Assistant City Attorney
Attorneys for Plaintiff.

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

THE CITY OF LOS ANGELES,
a municipal corporation,
Plaintiff,
vs.
KELIEL M. EKEM, et al.,
Defendants.

No. 570,240

FINAL ORDER OF CONDEMNATION

BE IT REMEMBERED that on this _____ day of July, 1950,
RAY L. CHESEBRO, City Attorney, by CHARLES F. REICHE, Assistant
City Attorney, attorneys for plaintiff, having made proof to the
satisfaction of this Court that the sum of money heretofore found
to be the total compensation proper to be paid to the defendants
in the above-entitled action by reason of the terms of that cer-
tain Interlocutory Judgment of Condemnation heretofore entered
herein on the 14th day of June, 1950, in Book 2166, Page 126 of
Judgments, has been paid to said defendants, or into Court for
their benefit;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND
DECREED that the real property set forth and described in Para-
graph VI of the complaint on file herein and hereinafter described,
be, and the same is hereby condemned in fee to the use of the

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Plaintiff, The City of Los Angeles, a municipal corporation, and to the use of the public and dedicated to such public use for public playground and recreation purposes of said City, located southwesterly of and adjacent to Main Street between Club House Avenue and Westminster Avenue.

That the real property condemned herein in fee for the aforesaid use is located in The City of Los Angeles, County of Los Angeles, State of California, and is more particularly bounded and described as follows, to-wit:

That portion of the Rafael & Andres Machado Tract, as per map recorded in Book 54, Pages 33 and 34 of Miscellaneous Records, in the office of the County Recorder of Los Angeles County described as follows:

Beginning at the intersection of the southeasterly line of Club House Avenue with the southwesterly line of Club House Boulevard as shown on map of Venice View Tract, recorded in Book 5, Page 104 of Maps, in the office of the County Recorder of Los Angeles County; thence southeasterly along the southwesterly line of Club House Boulevard as shown on map of said Venice View Tract to the northwesterly line of Westminster Avenue as conveyed to the City of Ocean Park by deed recorded in Book 3616, Page 150 of Deeds, in the office of the County Recorder of said County; thence southwesterly along said northwesterly line of Westminster Avenue to the northeasterly line of that certain strip of land conveyed to the City of Venice by deed recorded in Book 7371, Page 8 of Deeds, in the office of the County Recorder of said County; thence northwesterly along said last mentioned northeasterly line to said southeasterly line of Club House Avenue; thence northeasterly along said southeasterly line of Club House Avenue to the point of begin-

Page 10
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MIN. 33660 PAGE 150

ing. Subject to an easement for public street purposes
over that portion lying within the lines of Main Street
80 feet wide.

DATED: July 12, 1950.

[Signature]
Judge of the Superior Court.

THE DOCUMENT TO WHICH THIS CERTIFICATION IS
ATTACHED IS A FULL, TRUE AND CORRECT COPY OF
THE ORIGINAL ON FILE AND OF RECORD IN MY OFFICE
SAME HAVING BEEN FILED
AND ENTERED
JUDGMENT BOOK 2714 PAGE 148
ATTEST [Signature] 19 50
MARGALIE J. GIBBY COUNTY CLERK AND CLERK OF THE SUPERIOR
COURT OF THE STATE OF CALIFORNIA IN AND
FOR THE COUNTY OF LOS ANGELES
BY [Signature] DEPUTY

DOCUMENT No. 2714
RECORDED AT REQUEST OF
City Attorney
JUL 12 1950
16 MIN. PAGE 2 PM
BOOK 33660 PAGE 148
OFFICIAL RECORDS
County of Los Angeles, California
Fee \$ 1.00
MARGALIE BEATTY, County Recorder
BY [Signature] Deputy

2714

[Signature]

Exhibit 2

Address of Building 1234 Pacific Avenue



CITY OF LOS ANGELES
CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety. This certifies that, so far as ascertained by or made known to the undersigned, the building at the above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses, Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Housing Law for following occupancies:

Issued 06-19-74 Permit No. and Year LA70565/73

One story, Type V, 40' x 72', senior citizens center, meeting room maximum occupants load-218, one parking spaces required, 2 parking spaces provided, G-1/IS-2 occupancy.
ZA 209540 & 20959

Owner: City of Los Angeles
Owner's Address: Recreation and Parks
3900 Chevy Chase Drive
Los Angeles, California

Exhibit 3

MOTION

Each night in Los Angeles, nearly 20,000 people go without shelter, many of them sleeping on sidewalks in makeshift encampments, surrounded by what few possessions they own. In most of the City of Los Angeles, there is no place for them to safely keep their belongings during the day, causing semi-permanent and round-the-clock encampments in various neighborhoods and business districts.

The lack of voluntary and free storage for people living on the streets presents a significant barrier for many to access social services or get into housing. Without a place to keep their belongings, many people refuse to accept a bed at a temporary or emergency shelter, which often strictly limit how much luggage someone can bring. Without a place to safely keep their belongings, many people risk losing everything they own if they leave their encampment for a medical appointment, or a visit to a social service agency.

The City's recently adopted Comprehensive Homeless Strategy (CHS), and specifically Strategy 6A - Facilities, states that until additional homeless housing stock can adequately meet demand, additional homeless storage facilities are needed throughout the City in order to augment the limited capacity offered in the City of Los Angeles: a large facility on Skid Row operated by Chrysalis; and a very small facility on Venice Beach with limited hours operated by volunteers with the Venice Community Housing Corporation. The CHS calls for storage facilities throughout the City that would provide homeless individuals with the ability to store their property, a standard process to access those belongings on a daily basis if needed.

The City asked the Los Angeles Homeless Services Authority (LAHSA) to develop a plan for a network of citywide storage facilities to serve our residents experiencing homelessness. LAHSA is recommending, in consultation with Council District 11, an existing, vacant, City-owned building located at 1234 Pacific Avenue in Venice that can serve this purpose. This site, the former Westminster Senior Center, offers restroom access and space for a case manager who can facilitate entry into integrated data management systems (CES/HMIS) for services and housing as well as storage opportunities for people who are homeless. LAHSA can modify its existing contract with Chrysalis, an experienced operator, to run the Venice facility. Costs should be covered by savings in this year's budgeted amount for storage and emergency shelter funds that were provided for the El Niño season.

Consistent with Council's adoption of the CHS and Strategy 6A specifically, city staff and LAHSA should proceed with securing the space, executing contract modifications with Chrysalis, and opening the program at the facility.



I THEREFORE MOVE that the Department of Recreation and Parks be requested to authorize the use of this existing, vacant, City-owned building located at 1234 Pacific Avenue in Venice, to provide immediate, free storage opportunities for our residents experiencing homelessness;

I FURTHER MOVE that the City Administrative Officer in consultation with the Los Angeles Homeless Services Authority (LAHSA) be directed to identify sufficient funding for Chrysalis to manage the day to day operation for homeless storage services at the above described facility.


PRESENTED BY:



MIKE BONIN

Councilmember, 11th District

SECONDED BY:



ORIGINAL

APR 13 2016

Exhibit 4

CITY OF LOS ANGELES
 INTERDEPARTMENTAL CORRESPONDENCE

RECEIVED
 South Coast Region

JUN 16 2016

Date: June 13, 2016

To: Michael Shull, General Manager
 Department of Recreation and Parks

CALIFORNIA
 COASTAL COMMISSION

From: ~~for~~ Gary Lee Moore, PE, ENV SP, City Engineer
 Bureau of Engineering
 Department of Public Works

Alfred Z. Mata

APPEAL PERIOD ENDS AT 5:00 P.M.

ON 7-15-2016

APPEAL RECEIVED: YES NO

Subject: **Westminster Homeless Services Center – Exclusion from Coastal
 Development Permit Requirements**

The Department of Recreation and Parks (RAP) is proposing to perform minor maintenance and repair activities at an existing RAP facility at 1234 S. Pacific Avenue in the community of Venice in Los Angeles (see attached Figure 1). The facility is a single-story building constructed in 1973 and located on the same city block as the Westminster Dog Park. The scope of the proposed work consists of minor maintenance and Americans with Disabilities Act (ADA) modifications to the building, minor asbestos abatement and termite fumigation, ADA modifications to the restroom doors and fixtures, installation of an ADA ramp at the entrance to the main walkway for path of travel, minor repairs to other concrete walkways around the building, and general maintenance such as cleaning and painting (see attached Figures 2 and 3).

Upon completion of the maintenance and repair activities, the facility would be used as a homeless services center administered by a local non-profit organization. The center would facilitate coordination between clients and various off-site homeless services, such as housing, food, and medical and dental. In addition, the facility would provide access to the on-site restroom facilities and temporary on-site storage of clients' belongings in individual bins to accommodate their use of the outside services. There would be no overnight accommodations or food service at the center. The facility has previously been used as a senior citizen center and the planned operations at the facility do not represent a change in intensity of use of the facility.

The proposed project is within the single-jurisdiction area of the Coastal Zone and consists of repair and maintenance of an existing City facility. Bureau of Engineering staff has concluded that the project qualifies for exclusion from coastal development permit requirements pursuant to Section 30610(b) of the California Coastal Act as improvements to a structure other than a single-family residence or public works facility. The proposed project would not change the intensity of use of the structure and therefore is not one of the types of projects enumerated in Section 13253 of the California Coastal Commission regulations for which a coastal development permit is required.

Additionally, the proposed project is excluded from coastal development permit requirements as repair and maintenance under Section 30610(d) of the California

Michael Shull, General Manager
June 13, 2016
Page 2

Coastal Act. This section excludes "repair or maintenance activities that do not result in addition to, or enlargement or expansion of, the object of such repair or maintenance activities." The proposed project falls within the activities included in the guidelines entitled *Repair, Maintenance and Utility Hook-up Exclusions from Permit Requirements*, adopted by the California Coastal Commission on September 5, 1978, as routine repair and maintenance of existing structures or facilities. The facility at 1234 S. Pacific Avenue was constructed in 1973, before the effective date of the Coastal Act. The proposed project would not alter the level or type of use of the facility and it would not alter the size of the structure. The proposed project does not involve any of the extraordinary methods of repair and maintenance listed in Section 13252 of the California Coastal Commission regulations, nor would it have a risk of substantial adverse impact on public access, environmentally sensitive habitat area, wetlands, or public views to the ocean.

Please be advised that only the project described above is excluded from the permit requirements of the Coastal Act. Any change in the project may cause it to lose its excluded status.

If you have any questions about this determination, please contact Maria Martin of my staff at Maria.Martin@lacity.org or (213) 485-5753.

GLM/MEM:nm

Q:\Norman\Westminster Homeless Services Center\Exclusion Memo 160613.doc

Attachments

cc: Ramon Barajas, Department of Recreation and Parks
Vince Bertoni, City Planning Department
Raymond Chan, Department of Building and Safety
Paul Davis, Department of Recreation and Parks
Al Padilla, California Coastal Commission
Charles Posner, California Coastal Commission ✓
Cathie Santo Domingo, Department of Recreation and Parks

Exhibit 5

APPROVED
08-10-2016

BOARD OF RECREATION
3 PARK COMMISSIONERS

BOARD REPORT

NO. 16-184

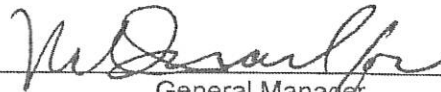
DATE August 10, 2016

C.D. 11

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: WESTMINSTER SENIOR CITIZEN CENTER – MINOR MAINTENANCE AND FACILITY IMPROVEMENTS PROJECT; ISSUANCE OF TEMPORARY RIGHT-OF-ENTRY PERMIT TO THE LOS ANGELES HOMELESS SERVICES AUTHORITY FOR A TEMPORARY STORAGE FACILITY FOR THE STORAGE OF THE PERSONAL BELONGINGS OF HOMELESS PERSONS AND HOMELESS SERVICE INFORMATION CENTER; CATEGORICAL EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO ARTICLE 19, SECTION 15301, CLASS 1(A) AND SECTION 15303, CLASS 3(C) OF THE STATE CEQA GUIDELINES

AP Diaz	_____	V. Israel	_____
<i>fur</i> R. Barajas	<u>CSD</u>	K. Regan	_____
H. Fujita	_____	N. Williams	_____



General Manager

Approved _____ Disapproved _____ Withdrawn _____
As Amended

RECOMMENDATIONS

1. Approve the proposed Minor Maintenance and Facility Improvements project (Project) for the Westminster Senior Citizen Center as described in the Summary of this Report;
2. Authorize the General Manager or Designee to issue a Temporary Right-of-Entry Permit to the Los Angeles Homeless Services Authority for the purpose described in the Summary of this Report;
3. Find that the proposed Project is categorically exempt from the California Environmental Quality Act (CEQA)
4. Direct Staff to file the Notice of Exemption (NOE) within five working days of approval; and,
5. Direct the Chief Financial Officer to authorize a check to the Los Angeles County Clerk in the amount of \$75 for filing the NOE.

BOARD REPORT

PG. 2 NO. 16-184

SUMMARY

The Westminster Senior Citizen Center (Center) is in a single-story building located within the 2.24 acre Westminster Park at 1234 South Pacific Avenue in Venice, California (see Exhibit 1). The Westminster Dog Park is also co-located within Westminster Park. Historically, the Center provided various activities for seniors and a nutrition program provided lunch to the seniors. Several clubs and card players used the Center. In 2010, the nutrition program was relocated to another senior center due to declining numbers. A few clubs and card players remained and continued to use the Center. Over time, dog walkers and homeless persons used the Center as well.

Due to the age of the building constructed in 1973, Department of Recreation and Parks (RAP) staff is recommending that certain minor maintenance related work and facility compliance work be done to the Center. The proposed scope of work consists of minor maintenance and facility modifications to the building, asbestos abatement and termite fumigation, ADA modifications to the restroom doors and fixtures, installation of ramp at the entrance to the main walkway for path of travel, minor repairs to other concrete walkways around the building, and general maintenance such as cleaning and painting (see Exhibit 2).

The estimated cost for the proposed scope of work is approximately Five Hundred Thousand Dollars (\$500,000.00).

On June 24, 2016, the City Council approved the City Administrative Officer (CAO) 2015-16 Fourth Construction Projects Report. This Report included a recommendation to transfer Three Hundred Thousand, One Hundred Sixty Dollars (\$300,160.00) of residual funds from various accounts within the Sites and Facilities Fund to the RAP's Deferred Maintenance Account. The CAO's Office has assured RAP staff that additional funds to complete the proposed scope of work will be identified and made available to RAP in the near future. The proposed work will be completed by RAP staff and on-call contractors.

Upon the completion of the proposed maintenance and repair activities, RAP staff will issue a temporary Right-of-Entry Permit to the Los Angeles Homeless Services Authority (LAHSA) to use a portion of the Center for the storage of personal belongings of homeless persons and as a homeless services information center. LAHSA will hire a contractor or service provider to manage and operate the homeless storage facility and service information center. The temporary Right-of-Entry Permit will have a term of one year. All costs for the set-up, operation and maintenance of the storage and information center will be the responsibility of LAHSA and/or its contractor/service provider.

Homeless persons in need of various off-site homeless services, such as housing, food, and medical and dental services, would be able to obtain information at the site. In addition, the Center would provide access to the on-site restroom facilities and temporary on-site storage of personal belongings in bins to accommodate their use of the outside services. The public restrooms would be available for use. However, there would be no overnight accommodations, showering or food service at the Center.

BOARD REPORT

PG. 3 NO. 16-184

Temporary on-site storage occurs in two ways. The first is a Seven-Day Voluntary Storage. Persons are allowed to voluntarily store their belongings in a storage bin for a maximum of seven days (see Exhibit 3). If the belongings are not claimed within seven days, the belongings are transferred to another area that is under a second category called a 90-Day Mandatory Storage (see Exhibit 4). The service provider is required to keep the belongings up a maximum of 90 days. If the belongings are not claimed within the 90-day period, the belongings will be discarded.

The temporary on-site storage and information center will occupy the portion of the Center as depicted on Page 8 of Exhibit 2. Park users will continue to have access to the restrooms and lobby area of the Center, as well as the rest of the Westminster Park.

CEQA CLEARANCE

The Project at the site consists of the conversion of an existing small structure from one use to another where only minor modifications and alterations are made in the interior and exterior of the structure; and, the operation, repair, maintenance, and permitting of that existing public structure, involving negligible or no expansion. Therefore, Staff recommends that the Board make a determination that the proposed Project is categorically exempt from the California Environmental Quality Act (CEQA) pursuant to Article 19, Sections 15301 and 15303 of the State CEQA Guidelines. A Notice of Exemption will be filed with the Los Angeles County Clerk within five working days upon approval. **(Amendment included below)*

TREES AND SHADE

As described above and illustrated on Exhibit 2, no trees will be removed or affected by the minor maintenance and ADA related work. It is anticipated that no tree shade will be affected as well.

FISCAL IMPACT STATEMENT

As stated in this Report, the proposed minor maintenance and ADA related improvements will cost approximately \$500,000.00. Of this amount, \$300,160.00 will be transferred to the RAP's Deferred Maintenance Account in accordance with the City Council's approval of the CAO's 2015-16 Fourth Construction Projects Report. The CAO has assured RAP staff that additional funds to complete the aforementioned scope of work will be made available. Any and all costs related to the set-up, operation, and maintenance of the proposed temporary homeless storage and information center will be the responsibility of the LAHSA and/or its contractor/service provider.

This Report has been prepared by Cid Macaraeg, Senior Management Analyst II, Planning, Construction and Maintenance Branch.

*RAP staff recommends that the Board make the determination that the proposed Project is also exempt from CEQA based on the Common Sense Exemption pursuant to State CEQA Guideline Section 15061(b)(3) because it can be seen with certainty that there is no possibility that the activity in question may have a significant impact on the environment. RAP staff also recommends that the Board make the finding, based on the entire record available, that no unusual circumstances exist that distinguish this proposed Project from other routine projects in the Class 1 and Class 3 CEQA exemptions.

BOARD REPORT

PG. 4 NO. 16-184

LIST OF ATTACHMENTS/EXHIBITS


- 1) Draft Notice of Exemption and CEQA Categorical Exemption Supporting Analysis
- 2) Exhibit 1: Project Location
- 3) Exhibit 2: Project Plans
- 4) Exhibit 3: Seven-Day Voluntary Storage Bin
- 5) Exhibit 4: 90-Day Mandatory Storage Shelves
- 6) Exhibit 5: Photographs of Homeless Activity and Dog Walkers at Westminster Park
- 7) Exhibit 6: Top 15 Census Tracts by Density of Unsheltered Persons

Exhibit 6

COUNTY CLERK'S USE

CITY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT

DOCUMENT FILED City Clerk's Office NE-16-055-PP	No:	Certified by: 	Date: 8-11-16

NOTICE OF EXEMPTION

(Article III, Section 3, City CEQA Guidelines)

FORM RP 1-1-01

Submission of this form is optional. This form shall be filed with the County Clerk, 12400 East Imperial Highway, Norwalk, California 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21168(d), the filing of this notice starts a 35-day statute of limitation on Court challenges to the approval of the project. Failure to file this notice with the County Clerk results in the statute of limitation being extended to 180 days.

LEAD CITY AGENCY AND ADDRESS: Department of Recreation and Parks, 221 N. Figueroa Street, Suite 400, Los Angeles, CA 90012	COUNCIL DISTRICT: 11
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PROJECT TITLE: WESTMINSTER PARK—Facility Upgrades and Conversion of Westminster Senior Citizen Center to a Temporary Homeless Storage and Service Center	LOG REFERENCE: PRJ21035
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PROJECT LOCATION: 1234 Pacific Avenue and Westminster Street, Venice CA

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The proposed project consists of minor maintenance and ADA modifications to the Westminster Senior Citizen Center building, minor asbestos abatement and termite fumigation, ADA modifications to the restroom doors and fixtures, installation of an ADA ramp at the entrance to the main walkway for path of travel, minor repairs to other concrete walkways around the building, and general maintenance such as cleaning and painting. Upon completion, a portion of the Center would be used for the storage of personal belongings of homeless persons, access to restrooms, and as a homeless services information center. The beneficiaries of the project would be the homeless in the Venice area.

CONTACT PERSON: PAUL DAVIS	AREA CODE: 213	TELEPHONE NUMBER: 202-2667	EXT.:
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EXEMPT STATUS: (Check One)	CITY CEQA GUIDELINES	STATE CEQA GUIDELINES
<input type="checkbox"/> DECLARED EMERGENCY	Art. II, Sec. 2a(1)	ART. 18, Sec. 15269(a)
<input type="checkbox"/> EMERGENCY PROJECT	Art. II, Sec. 2(a)(2)(3)	ART. 18, Sec. 15269(b)(c)
<input type="checkbox"/> MINISTERIAL PROJECT	Art. II, Sec. 2b	ART. 18, Sec. 15268
<input checked="" type="checkbox"/> CATEGORICAL EXEMPTION	Art. II, Sec. 2(c) See Below	ART. 19, Sec. 15300 -15332
<input checked="" type="checkbox"/> GENERAL EXEMPTION	Art. II, Sec. 1	ART. 5, Sec. 15061
<input type="checkbox"/> STATUTORY EXEMPTION	Art. II, Sec. 2(i)	ART. 18, Sec. 15282
Class	Category	(State CEQA Guidelines)
1		Art. 19, Sec(s). 15301
3		Art. 19, Sec(s). 15303
G		Art. 5, Sec(s). 15061(b)(3)

OTHER(See Public Resources Code Sect. 21080(b) and set forth in state & city guidelines provisions)

JUSTIFICATION FOR PROJECT EXEMPTION:
The project would consist of the operation, repair, maintenance, permitting, or minor alteration of existing public structures and facilities, involving negligible or no expansion of use beyond that previously existing; the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure; and, in general it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE: PAUL DAVIS, Environmental Supervisor II 	DATE PREPARED: August 10, 2016
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FEE \$75.00	RECEIPT NO.	REC'D. BY:	ORIGINAL FILED AUG 11 2016 LOS ANGELES, COUNTY CLERK

**WESTMINSTER SENIOR CENTER
RECREATION AND PARKS DEPARTMENT**

**TEMPORARY HOMELESS STORAGE FACILITY, RESTROOMS,
AND SERVICES INFORMATION PROJECT**

CEQA CATEGORICAL EXEMPTION SUPPORTING ANALYSIS

PROJECT DESCRIPTION

Project Activities

The proposed Project consists of the following activities:

- Minor building maintenance to the existing Center
- Certain upgrades compliant with the American with Disabilities Act (“ADA”) to interior and exterior of the Center
- Minor asbestos abatement and termite fumigation
- Conversion of a portion of the existing Center to use as a temporary homeless storage facility operated by a contractor, for a period of one year, with access to restrooms by the homeless and provision of information to the homeless about supportive services available at other locations

Project Location

The proposed Project is located at the existing Westminster Senior Center building (“Center”) in Westminster Park (“Park”). The Center is a 2,800 square foot (“SF”) single-story building constructed in 1973, located within the 2.24 acre Westminster Park, at 1234 South Pacific Avenue in Venice, California (see Exhibit 1). The Center fronts on Pacific Avenue. It is comprised of a large multi-purpose room, a lobby, a small office, a kitchenette, and two restrooms. The fenced-in 0.8 acre Off-Leash Westminster Dog Park, which opened in 1999, is also co-located within Westminster Park. The Park is located about two blocks from the Pacific Ocean and the Venice Boardwalk.

Project Purpose

The purpose of the proposed Project is to do ADA upgrades and building maintenance to the existing Center and to provide, through a contractor, a temporary voluntary storage facility at the existing Center where, for a one year period, the homeless may store their belongings, access restrooms, and receive information on homeless supportive services available at other locations.

Local Conditions in Project Vicinity

According to recent and past survey data, the Venice area has a large homeless population within the City of Los Angeles. Supporting data and information on the existing homeless population in Venice, the City of Los Angeles, and the County of Los Angeles, is contained in the publicly

available Council File Management System operated by the Office of the City Clerk, in CF 15-1138, S1 through S11, and CF 15-0727.¹ A June 2016 survey of the homeless in Venice showed an estimated 489 homeless individuals within a half-mile of the Center and an estimated 925 homeless individuals within one mile of the Center. The Center is located in Census Tract 2734.02, which reported 154 homeless individuals. Thus, in the vicinity of the Project and in the surrounding area, a substantial homeless population exists now and has existed for many years.

RAP staff took photographs and video of the local conditions in the Project vicinity on July 15, 2016, which document the existing conditions and homeless activity. A copy of this documentation is provided with this CEQA analysis.

Other homeless support services exist in the vicinity (within three miles) of the proposed Project:²

- St. Joseph Center Homeless Services and Meals operates a homeless service center for homeless people of all ages. Services include case management; information and referral to community resources, including shelter referrals; advocacy for public benefits; hot meals; showers; laundry facilities; clean clothes; toiletries. People who want a hot morning meal sign up at the center for one of the three meals served at the agency's restaurant for homeless people, the Bread and Roses Cafe. People who sign up regularly can obtain a meal daily. People also sign up to schedule use of the shower or laundry facilities. The center can accommodate 30 people per day to shower and eight people per day for laundry. A change of clothing is usually available for people who come to the center, if needed.
- Mitchell House Substance Abuse Treatment Veterans provides residential treatment for substance abuse for homeless veterans, including those who have dual-diagnosis. Services include a residential alcohol treatment program and a residential drug abuse treatment program, including a special program for female veterans and the female dependents of male veterans.
- OPCC Safe Haven Cloverfield Services Center (Santa Monica) is an interim housing and day program that serves chronically homeless individuals who have had a history of challenges connecting with service providers. Safe Haven is based on an understanding that the mental health and addiction disorders of this population are lifelong. This program employs high tolerance for relapses as part of recovery and emphasizes the building of trusting relationships with staff and other clients.

Based on 2010 Census and 2016 American Community Survey data, there are only 443 seniors over the age of 65 within a half-mile walking distance of the Center, and approximately 6,934 seniors within a 3-mile driving distance to the center.

¹ See [https://www://cityclerk.lacity.org/lacityclerk connect/](https://www://cityclerk.lacity.org/lacityclerk%20connect/)

² See <http://www.homelessshelterdirectory.org/cgi-bin/id/city.cgi?city=Venice&state=CA>

Land uses surrounding the Center and Park are predominately medium density residential uses with some limited commercial along Westminster St. and Main St. south of the Park. The school located east of the Park is a public facility land use. Land use along Ocean Front Walk is limited commercial with some medium residential use similar to the other land uses in the vicinity of the Center.

Historical and Existing Operations at the Center

The Center was opened as a Senior Citizen Center in June 1974 and provided a variety of activities for seniors over the years. A nutrition program provided lunch to seniors. The Center also provided activities such as bingo, arts and crafts, guest speakers, and some computer workshops. The Center was open 5 days a week with attendance around 45 to 65 per day. Use of the Center fluctuated over time. During the City's financial crisis around 2009, the Center began to lose senior participation with daily numbers at around 15-25 per day. In mid-2009, all programs were canceled, including the lunch nutrition program, due to low participation and budget cuts due to the economy. The Center remained open four days a week from 11 am-3pm. It was decided to keep it open for the dog park users to be able to use the restrooms. In May of 2016 the Center was closed due to lack of staffing.

Building Maintenance and ADA Standards

RAP staff recommends that certain maintenance work and ADA compliance upgrades be done to the existing Center. The proposed scope of work consists of minor maintenance and ADA modifications to the building, minor lead and asbestos abatement, and termite fumigation, ADA modifications to the restroom doors and fixtures, installation of an ADA ramp at the entrance to the main walkway for path of travel, establishment of new ADA restroom features, minor repairs to other concrete walkways around the building, and general building maintenance such as cleaning and painting.

Future Use of the Center and Conversion of Use

Upon the completion of the proposed building maintenance and repair and ADA upgrades, if authorized by the Board as part of this Project, RAP will issue a temporary Right-of-Entry Permit to the Los Angeles Homeless Services Authority (LAHSA) to use a portion of the Center for the storage of personal belongings of homeless persons, access to restrooms by the homeless, and as a homeless services information center to direct the homeless to supporting services available elsewhere. The temporary Right-of-Entry Permit will have a term of one year. LAHSA will hire a contractor or service provider to manage and operate the homeless storage facility and service information center. All costs for the set-up, operation, and maintenance of the storage and information center will be the responsibility of LAHSA and/or its contractor/service provider.

Homeless persons in need of various off-site homeless services, such as employment counseling, housing, food, and medical and dental services will have access to the temporary on-site storage for personal belongings in bins. The storage facility will make it easier for the homeless owner of the belongings to travel to other locations to avail themselves of supportive services. In

addition, there would be access to the restrooms for the homeless. There would be no overnight accommodations, showering, or food service at the Center.

The proposed temporary on-site storage will be handled in two ways: seven-day storage and 90-day storage. For the seven-day voluntary storage, homeless individuals will be allowed to voluntarily store their belongings in a storage bin at the Center for a maximum of seven days. If the belongings are not claimed by the owner within seven days, the belongings will be transferred to shelves in a fenced ten foot by nine foot area within the temporary storage area, for a 90-day mandatory storage period. The service provider will be required by law to keep the belongings up a maximum of 90 days. If the stored belongings are not claimed by the end of the 90 day period, they will be discarded.

No increase in the size of the existing Center is proposed. The temporary storage facility for homeless belongings will occupy approximately 1,600 square-feet of the 2,800 square-foot Center, as depicted on the attached Exhibit 2. The storage facility is proposed to operate Monday-Friday from 8 am to 5 pm, and on Saturdays from 8 am to 1 pm. Westminster Park users will continue to have access to the restrooms and lobby area of the Center, as well as the rest of Westminster Park, including the Off-Leash Westminster Dog Park and the parking lot.

CEQA CLEARANCE

The proposed Project is subject to the following CEQA categorical exemptions, as analyzed below.

Class 1 Categorical Exemption for Existing Facilities – State of California CEQA Guidelines, Article 19, Section 15301

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 use beyond that previously existing at the time of the lead agency's determination. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of an existing use.

Examples include but are not limited to:

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

Analysis:

The proposed Project falls within the CEQA Class 1 Categorical Exemption for Existing Facilities for the following reasons. First, the Center is an existing public facility as required for this class of exempt projects. The Center was built in Westminster Park in 1973. Next, the Project activities proposed for approval by the RAP Board fall within the Class 1 exempt class and consist of the repair, maintenance, permitting (issuance of Right of Entry permit), and minor alteration of the existing Westminster Senior Center. These activities are routine building maintenance in the form of painting and repair work, ADA upgrades to the building exterior in the form of an entrance ramp, and ADA upgrades to the bathrooms inside the existing building. Many of the Project maintenance activities related to the existing building are for public health and safety reasons (to meet ADA standards for example), which type of activities are expressly included activities in the CEQA Class 1 exemption. Finally, the Project involves negligible expansion of use as required for this exempt class. The use of a portion of the existing Center for a one year period to provide the homeless with temporary storage of their belongings and access to restrooms and information on available supporting services elsewhere, involves negligible expansion of the historical use of this already existing public facility. The use of the existing building as a senior center fluctuated over time since the senior center opened in 1974. Senior center operations and programs declined due to the recent economic recession and the senior center was closed to the public in May 2016 due to lack of staffing. The use of a portion of the building for temporary homeless storage, however, will result in negligible expansion of the average historical use of the Center for purposes of this CEQA exemption. The Project will involve individuals dropping off and picking up their belongings at the Center, using the public restrooms, and receiving information on supportive services. The proposed Project does not include approval of any new food service, showering, or overnight accommodations.

**Class 3 Categorical Exemption for Conversion of Small Structures – State of California
CEQA Guidelines, Article 19, Section 15303**

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel.

Examples of this exemption include, but are not limited to:

(c) A store, motel, office, restaurant or similar structures structure not involving the use of significant amounts of hazardous substances, and not exceeding 2500 square feet in floor area. In urbanized areas, the exemption also applies to up to four such commercial buildings not exceeding 10,000 square feet in floor area on sites zoned for such use, if not involving the use of significant amounts of hazardous substances where all necessary public services and facilities are available and the surrounding area is not environmentally sensitive.

Analysis:

The proposed Project falls within the CEQA Class 3 Categorical Exemption for the Conversion of Small Structures for the following reasons. First, the Center is a small structure. It is about 2,800 SF in size, so it is small enough to fit well within the square footage of the buildings given as examples for this class of exempt projects in State CEQA Guideline 15303. That Guideline describes the Class 3 exemption as including, but not limited to, four commercial buildings not exceeding 10,000 square feet in size in an urbanized area. The proposed Project is much smaller than that square footage and is located in an urbanized area, as defined in Guideline 15387, because it is located in the City of Los Angeles, which has a population of more than 50,000. The Project includes only minor modifications to the building exterior related to building maintenance, such as painting, and an ADA ramp for access. The Project falls within this exempt class of CEQA projects because it will convert a portion of the existing 2,800 SF small building to a facility for homeless storage in about 1,600 SF of the Center, with access to the upgraded bathrooms and information on supporting services for the homeless, for a temporary one year period.

Exceptions to the Use of Categorical Exemptions

- (a) Location.** The Class 3 exemption is qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, the Class 3 exemption is considered to apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to laws by federal, state, or local agencies.

Analysis:

The Location exception does not bar the application of the Class 3 categorical exemption to the proposed Project. No environmental resource of hazardous or critical concern designated, precisely mapped, or officially adopted will be impacted by the proposed Project because the proposed Project is located primarily inside the existing Center within Westminster Park. Exterior alterations to the existing Center building that are part of the Project are limited to routine maintenance such as painting the building, and the construction of an ADA compliant entrance ramp. Because the proposed Project activities are primarily interior to an existing building, and the minor exterior repair and maintenance construction will take place at an already developed building without enlarging the building, the Project will have no impact on any Coastal Zone environmental resource. This conclusion is further supported by the June 13, 2016 memo and analysis of the Department of Public Works Bureau of Engineering, which concluded the proposed Project is excluded from Coastal Development Permit requirements. A copy of this memo is included in the Project file.

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

Analysis:

The proposed Project will result in a temporary voluntary storage facility that would be contained entirely within the existing building at Westminster Park. There would be a one-time renovation of the building for maintenance related and ADA requirements. Given the minor physical changes that will result from the Project approval, no significant cumulative impacts will result.

- (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.

Analysis:

No unusual circumstances exist that distinguish this Project from other routine projects in the Class 1 and Class 3 exemptions, and the Project will not result in any significant impact for the following reasons. The proposed Project consists of routine maintenance of an existing public facility building that has existed and was open to the public from 1974 to May 2016. It includes ADA upgrades to the building to comply with public health and safety standards. The proposed

Project will allow use of a portion of the existing upgraded public facility to provide services to the homeless in a community where a large number of homeless and homeless services facilities already exist. There is no feature or condition of the Project that distinguishes it from other projects exempt under the Class 1 or Class 3 categorical exemptions, such as project size or location. The proposed Project is modest in size, and is located at an already existing public facility that until May 2016 had been open to the public for many years. Additionally, based on factual information compiled by City staff regarding local conditions in the vicinity of the Project, the Venice area has a large existing homeless population and Westminster Park is currently impacted by homeless use as shown in the photographic analysis provided with this document. Other homeless storage facilities exist in the vicinity, including on Windward Plaza and Ocean Front Walk, and a number of homeless service providers operate in the local Project vicinity as described above.

(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, or within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

Analysis:

The proposed Project would not damage any scenic resources including trees, historic buildings, rock outcroppings or similar resources. And, there are no state scenic highways in the vicinity of Westminster Park that would be affected by the project.

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

Analysis:

Based on a review of the EnviroStor state database, there are no contaminated site investigations or cleanup sites located at the park or within a 1,000 feet of the park perimeter. Therefore, this exception to an exemption does not apply.

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

Analysis:

The Center building was constructed in 1973, and based on a City Planning Department ZIMAS Report (7/22/16), the building is not a historic building and is not located in a Historic Preservation Overlay Zone (HPOZ). Therefore the proposed Project would not have a substantial adverse effect on a significant historic resource, and this exception to an exemption does not apply.

ADDITIONAL FACTUAL SUPPORT FOR CATEGORICAL EXEMPTIONS

Aesthetics

Substantially degrade the existing visual character or quality of the site and its surroundings? (Appendix G-Initial Study Checklist, Section I (c) of the State CEQA Guidelines)

Based on video logs and photographic documentation of the existing conditions, the park is already used extensively by the homeless. During the day many homeless individuals tend to congregate at the park along with all their belongings. This has required periodic cleanup during which unattended belongings are removed and placed into mandatory 90-day storage at a downtown storage facility. The proposed voluntary storage facility would in effect help to eliminate the visual character of the park by moving the homeless belonging out of the park and into storage. Homeless individuals would then be free to go other places than necessarily the park. Therefore, the proposed Project is not anticipated to substantially degrade the existing visual character of the site beyond the baseline conditions, but may help to improve existing conditions.

Air Quality

Create objectionable odors affecting a substantial number of people? (Appendix G-Initial Study Checklist, Section III(e) of the State CEQA Guidelines)

The proposed storage facility is not expected to create objectionable odors that would noticeably affect surrounding land uses or park patrons. Based on interviews with LAHSA and Chrysalis (the probable contractual operator), odor at other storage facilities has not been an issue. The storage bins have closable lids, which helps contain any odors. And any complaints about odors could be easily remedied with deodorizers that would be kept on site. In addition, the restrooms will be made available for those using the storage facility, which could help eliminate existing public urination and defecation in the Park. As a corollary to this restroom issue, no complaints of odor problems have been received from the dog park located within the Park and adjacent to the proposed storage facility. Therefore, the proposed Project is not expected to create objectionable odors affecting a substantial number of people.

Hazardous Materials

Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Appendix G-Initial Study Checklist, Section VII (a) of the State CEQA Guidelines)

According to a July 15, 2016 interview by City staff with Molly Larson, Director of Operation for Chrysalis, strict rules would be enforced during registration and loading of the storage bins that prohibit any hazardous materials such as weapons, drugs and drug paraphernalia, aerosol paint cans, and other similar types of items. The storage staff does not handle any of the belongings, and the bins are delivered and retrieved for the registered patrons. Prohibit materialed would be collected on-site and disposed of in accordance with the appropriate waste characterization through licensed transporters and

disposal facilities. Items that are not reclaimed after seven days are put into a 90-day storage area. After 90 days the material is discarded as waste. All operations staff will be trained in the handling of hazardous materials in accordance with all OSHA regulations to prevent injuries or illness to staff. Therefore, the proposed Project is not expected to have a significant impact due to the routine transport, use, or disposal of hazardous materials.

Land Use and Planning

Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (Appendix G-Initial Study Checklist, Section IX(b) of the State CEQA Guidelines)

The proposed Project is consistent with the goals and objectives of the Housing Element of the City's General Plan as outlined in Chapter 6 of the current Housing Element, adopted December 3, 2013. Specifically, Goal 4 of the Housing Element sets forth a City goal to prevent and end homelessness. The policies and programs of this Housing Element goal and the City's Comprehensive Homeless Strategy adopted in 2016 focus on a tiered approach that recognizes the need to provide sufficient temporary and emergency shelters to meet short-term needs while working toward a rapid return to more stable housing or permanent supportive housing over the longer-term. The provision of voluntary storage is seen by many to be the first step in achieving these policies and programs because the homeless individual now has a secure place to store their belongings in order to receive the kind of supportive services that will end their homelessness.

The proposed Project has also been reviewed by the City Planning Department and determined to be exempt from the procedures for coastal development projects within the Venice Coastal Specific Plan. Therefore, the Project is consistent with the Venice Coastal Specific Plan.

Noise

Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (Appendix G-Initial Study Checklist, Section XI (d) of the State CEQA Guidelines)

Environmental noise is measured in decibels (dB). To better approximate the range of sensitivity of the human ear to sounds of different frequencies, the A-weighted decibel scale (dBA) was devised. Because the human ear is less sensitive to low frequency sounds, the A-scale deemphasizes these frequencies by incorporating frequency weighting of the sound signal. When the A-scale is used, the decibel levels are represented by dBA. On this scale, the range of human hearing extends from about 3 dBA to about 140 dBA. A 10-dBA increase is judged by most people as a doubling of the sound level.

The City of Los Angeles Noise Ordinance addresses noise generated at construction sites, including permissible hours of construction, increases in ambient noise levels, and the technical feasibility of reducing noise from certain construction equipment. In addition, operational noise from both stationary and mobile sources is regulated by the Ordinance.

A project would normally have a significant impact on noise levels from construction, if construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more, or construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use at a noise sensitive use, and any construction activity that would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

The proposed renovation activities for the project are expected to use the typical types of construction equipment including trucks concrete trucks and pumps, saws, and compressors. The repairs and maintenance work will include structural, concrete, and architectural finishing. These construction equipment and activities would generate temporary noise levels in the range of 76 to 91dBA at 50 feet (with required mufflers).

Presumed ambient noise levels for residential areas is 50 dBA in the daytime. However, the predominant noise source within the City of Los Angeles is motor vehicle sources. Along Pacific Avenue and Main Street, which are both classified as Secondary Highways, residence and the school may experience noise levels ranging from the low- to high-70 decibel range from traffic related noise.

Noise levels 50 feet from a source decrease by approximately 3 dBA over a hard, unobstructed surface, such as asphalt, and by approximately 4.5 dBA over a soft surface, such as a vegetated area. For every doubling of distance thereafter, noise levels drop another 3 dBA over a hard surface and 4.5 dBA over a soft surface.

During a 2 to 3-month construction period, residences along Pacific Avenue could experience temporary noise levels of up to 91 dBA, which would be approximately a 10 dBA above ambient levels for residential uses on a secondary highway. However, this noise level would not occur for more than one day during the construction period, when concrete trucks and pumps are on site for a pour. All construction activities would occur within the weekday hours between 7:00 am and 6:00 pm.

Residences along Westminster Avenue and Clubhouse Avenue, and the school along Main Street are located more than 500 feet from the Center building with intervening soft turf, trees, and the dog park. These areas would experience an increase in ambient noise levels of 5 dBA or less during the construction period.

For the proposed operational activities, a project would normally have a significant impact on noise levels if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in Community Noise Equivalent

Level (CNEL) to or within the "normally unacceptable" or "clearly unacceptable" category, or any noise increase of 5 dBA or greater. The CNEL represents an energy average of the A-weighted noise levels over a 24-hour period with 5 dBA and 10 dBA increases added for nighttime noise between the hours of 7:00 p.m. and 10:00 p.m. and 10:00 p.m. to 7:00 a.m., respectively. The increases were selected to account for reduced ambient noise levels during these time periods and increased human sensitivity to noise during the quieter periods of the day.

Operations of the proposed storage facility will almost exclusively consist of foot traffic to and from the facility. Temporary accumulation of those using the storage facility in the Park would not generate substantial noise. Otherwise all activities at the Center will occur indoors, and would not generate a substantial increase in noise. Since the storage operation will regularly occur from 8:00 am to 5:00 pm weekdays, increase in ambient noise levels would not exceed 3 dBA that is either "normally unacceptable" or "clearly unacceptable." No noise levels would exceed 5 dBA at any time.

Therefore, the proposed Project would not create any unacceptable increases in ambient noise levels for construction or operational activities beyond the thresholds established by the City noise ordinance.

Public Services

Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

Fire protection?

Police protection?

Schools?

Parks?

Other public facilities?

(Appendix G-Initial Study Checklist, Section XII (a) of the State CEQA Guidelines).

The storage facility would provide its own security service for day to day operations. However, the Los Angeles Police Department (LAPD) would respond to any problems beyond normal security. The nearest LAPD station to Westminster Park is the Pacific Division station located at 12312 Culver Blvd. just a little over 2 miles away. In addition, a Pacific Division sub-station is located less than a mile from the Park at 1530 West Ocean Front Walk and the existing police sub-station is involved with the homeless population in Venice on a daily basis. Therefore, the proposed Project is not expected to require additional policing services that would need new or physically altered police facilities.

Westminster Park is about one mile from Los Angeles Fire Department Station No. 63 located at 1930 Shell Avenue in Venice. Therefore, the proposed Project is not expected

to require additional emergency response services that would need new or physically altered fire station facilities.

The proposed Project would otherwise generate no requirements for schools, parks, or other public facilities that would need new or physically altered public or governmental facilities.

Recreation

Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?(Appendix G-Initial Study Checklist, Section XIV (a) of the State CEQA Guidelines).

The proposed Project could result in an increase the use of existing Westminster Park such that physical deterioration of the facility would occur or be accelerated beyond the homeless that already frequent the Park. However, the proposed storage facility is seen as the first step in helping the homeless find permanent housing that would eliminate the use of the Park by the homeless. This would help to move their belongings into a storage facility and provide restrooms, and thereby reduce the existing maintenance requirements at the Park. In addition, the proposed repair and maintenance of the Center will restore an already deteriorated building. Therefore, the proposed Project is not expected to require additional Park maintenance services to prevent physical deterioration of the facility.

Transportation/Traffic

Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)? (Appendix G-Initial Study Checklist, Section XV (a) of the State CEQA Guidelines).

The proposed Project is not expected to increase traffic in relation to the existing traffic loads and capacity of the street system. Operations of the proposed storage facility will almost exclusively consist of foot traffic to and from the facility. There would be no substantial increases in vehicle trips in relation to trash pickup or Park maintenance activities.

Utilities

Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (Appendix G-Initial Study Checklist, Section XVI (f) of the State CEQA Guidelines).

Comply with federal, state, and local statutes and regulations related to solid waste? (Appendix G-Initial Study Checklist, Section XVI (g) of the State CEQA Guidelines)

The Central Los Angeles Recycling and Transfer Station (CLARTS) provides transfer services to City of Los Angeles solid waste collection operations, which includes the proposed project site. This transfer station serves to temporarily store refuse collected throughout the City before a larger truck is ready to pick it up and transport it for the long haul to the nearest landfill. As the City's own landfills are all closed, the destinations are private landfills. Sunshine Canyon Landfill receives the majority of the municipal solid waste from the City which has sufficient capacity to accommodate the Project's solid waste disposal needs.

Cumulatively Considerable Impact

Does the project have impacts that are individually limited but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

There are no cumulatively considerable impacts associated with this Project. The City's Comprehensive Homeless Strategy that was released this year includes the development of a selection process for more temporary storage facilities within the City. However, no other storage facilities are currently planned, and future facilities are too speculative for analysis. Therefore, the Project would have no impacts that are individually limited but cumulatively considerable.

Attachments:
EXHIBITS 1 through 5

Exhibit 7

1234 S Pacific Ave



Permit #: B16LA08264
Plan Check #: B16LA08264
Event Code:

16016 - 10000 - 12896
Printed: 09/13/16 02:58 PM

Bldg-Alter/Repair Commercial Plan Check at Counter Plan Check	City of Los Angeles - Department of Building and Safety	Issued on: 09/13/2016 Last Status: Issued Status Date: 09/13/2016
APPLICATION FOR BUILDING PERMIT AND CERTIFICATE OF OCCUPANCY		

1. TRACT	BLOCK	LOT(s)	ABB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
RAFAEL AND ANDRES MACHAJ		"UNNUMBERED LT"	208	M R 84-33/34	108A143 201	4238 - 002 - 900

3. PARCEL INFORMATION		
Area Planning Commission - West Los Angeles LADBS Branch Office - WLA Council District - 11 Certified Neighborhood Council - Venice Community Plan Area - Venice	Census Tract - 2734.02 Coastal Zone Cons. Act - YES District Map - 108A143 Energy Zone - 6 Earthquake-Induced Liquefaction Area - Yes	Methane Hazard Site - Methane Zone Near Source Zone Distance - 4.9 School Within 500 Foot Radius - YES Thomas Brothers Map Grid - 671-G6

ZONES(S): OS-1XL

4. DOCUMENTS		
ZI - ZI-2406 Dir Inter of Venice SP for Small	SPA - Los Angeles Coastal Transportation Cor	ORD - ORD-145252
ZI - ZI-2452 Transit Priority Area in the Cit	SPA - Venice Coastal Zone	ORD - ORD-168999
ZA - ZA-20540	ORD - ORD-121313	ORD - ORD-169186-SA740
ZA - ZA-20959	ORD - ORD-130337	ORD - ORD-172019
		ORD - ORD-172897
		ORD - ORD-175693
		ORD - ORD-175694
		DTRM - DIR-2014-2824-DI

5. CHECKLIST ITEMS
Permit Flag - Not a Fire Life Safety Project Std. Work Descr - Seismic Gas Shut Off Valve

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION
Owner(s): L A CITY 0, 0 -- Tenant:
Applicant: (Relationship: Agent for Owner) AREN GALUSTIANS - 221 N FIGUEROA ST STE 400, LOS ANGELES, CA 90012 -- (213) 202-2656

For Cashier's Use Only W/O #: 61612896

7. EXISTING USE	PROPOSED USE
(04) Recreation Building	

8. DESCRIPTION OF WORK
Interior & exterior modifications to (e) "senior citizens center" : Upgrade (2) restrooms to comply with accessibility requirements ; relocate (e) accessible parking stall and revise path of travel . No change in total parking provided . No change in use.

9. # Bldgs on Site & Use:

10. APPLICATION PROCESSING INFORMATION	
BLDG. PC By: George Banning	DAS PC By:
OK for Cashier: George Banning	Coord. OK:
Signature: <i>[Signature]</i>	Date: 09/13/2016

LA ERNI 103091487 9/13/2016 2:58:11 PM	
BUILDING PERMIT COMM	\$461.25
BUILDING PLAN CHECK	\$0.00
EI COMMERCIAL	\$11.20
ONE STOP SURCH	\$9.45
SYSTEMS DEVT FEE	\$28.35
CITY PLANNING SURCH	\$27.68
MISCELLANEOUS	\$10.00
PLANNING GEN PLAN MAINT SURCH	\$23.06
CA BLDG STD COMMISSION SURCHARGE	\$2.00
BUILDING PLAN CHECK	\$0.00
Sub Total:	\$572.99

11. PROJECT VALUATION		Final Fee Period
Permit Valuation:	\$40,000	PC Valuation:
Sewer Cap ID:		Total Bond(s) Due:

12. ATTACHMENTS	
Owner-Builder Declaration	<i>[Signature]</i>
Plot Plan	<i>[Signature]</i>

For inspection requests, call toll-free (888) LA4BUILD (524-2845). Outside LA County, call (213) 482-0000 or request inspections via www.ladbs.org. To speak to a Call Center agent, call 311. Outside LA County, call (213) 473-3231.



* P 1 6 0 1 6 1 0 0 0 0 1 2 8 9 6 F N *

Permit #: 160161000012896
Building Card #: 2016LA69569
Receipt #: 0103631811

1050021201610450

13. STRUCTURE INVENTORY

(Note: Numeric measurement data in the format "number / number" implies "change in numeric value / total resulting numeric value")

16016 - 10000 - 12896

14. APPLICATION COMMENTS:

** Approved Seismic Gas Shut-Off Valve may be required. ** (e) Use under 1973LA70565, use code "4, senior citizens center" ** This permit supersedes application # 16016-10000-21274 for same work description .

In the event that any box (i.e. 1-16) is filled to capacity, it is possible that additional information has been captured electronically and could not be printed due to space restrictions. Nevertheless the information printed exceeds that required by section 19825 of the Health and Safety Code of the State of California.

15. BUILDING RELOCATED FROM:

16. CONTRACTOR, ARCHITECT & ENGINEER NAME	ADDRESS	CLASS	LICENSE #	PHONE #
(A) GAETOS, BENJAMIN ABAT	5129 CASPAR AVENUE,	LOS ANGELES, CA 90041	C31227	(213) 202-4331
(O) OWNER-BUILDER			0	

PERMIT EXPIRATION/REFUNDS: This permit expires two years after the date of the permit issuance. This permit will also expire if no construction work is performed for a continuous period of 180 days (Sec. 98.0602 LAMC). Claims for refund of fees paid must be filed within one year from the date of expiration for permits granted by LADBS (Sec. 22.12 & 22.13 LAMC). The permittee may be entitled to reimbursement of permit fees if the Department fails to conduct an inspection within 60 days of receiving a request for final inspection (HS 17951).

17. OWNER-BUILDER DECLARATION

I hereby affirm under penalty of perjury that I am exempt from the Contractors' State License Law for the following reason (Section 7031.5, Business and Professions Code: Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he or she is licensed pursuant to the provisions of the Contractors License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he or she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500):

I, as the owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044, Business and Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or herself or through his or her own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year from completion, the owner-builder will have the burden of proving that he or she did not build or improve for the purpose of sale).

OR

I, as the owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business and Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractors License Law.)

18. WORKERS' COMPENSATION DECLARATION

I hereby affirm, under penalty of perjury, one of the following declarations:

I have and will maintain a certificate of consent to self insure for workers' compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:

Carrier: _____ Policy Number: _____

I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS (\$100,000), IN ADDITION TO THE COST OF COMPENSATION, DAMAGES AS PROVIDED FOR IN SECTION 3706 OF THE LABOR CODE, INTEREST, AND ATTORNEY'S FEES.

19. ASBESTOS REMOVAL DECLARATION / LEAD HAZARD WARNING

I certify that notification of asbestos removal is either not applicable or has been submitted to the AQMD or EPA as per section 19827.5 of the Health and Safety Code. Information is available at (909) 396-2336 and the notification form at www.aqmd.gov. Lead safe construction practices are required when doing repairs that disturb paint in pre-1978 buildings due to the presence of lead per section 6716 and 6717 of the Labor Code. Information is available at Health Services for LA County at (800) 524-5323 or the State of California at (800) 597-5323 or www.dhs.ca.gov/childlead.

20. FINAL DECLARATION

I certify that I have read this application INCLUDING THE ABOVE DECLARATIONS and state that the above information INCLUDING THE ABOVE DECLARATIONS is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes. I realize that this permit is an application for inspection and that it does not approve or authorize the work specified herein, and it does not authorize or permit any violation or failure to comply with any applicable law. Furthermore, neither the City of Los Angeles nor any board, department officer, or employee thereof, make any warranty, nor shall be responsible for the performance or results of any work described herein, nor the condition of the property nor the soil upon which such work is performed. I further affirm under penalty of perjury, that the proposed work will not destroy or unreasonably interfere with any access or utility easement belonging to others and located on my property, but in the event such work does destroy or unreasonably interfere with such easement, a substitute easement(s) satisfactory to the holder(s) of the easement will be provided (Sec. 91.0106.4.3.4 LAMC).

By signing below, I certify that:

- I accept all the declarations above namely the Owner-Builder Declaration, Workers' Compensation Declaration, Asbestos Removal Declaration / Lead Hazard Warning, and Final Declaration; and
- This permit is being obtained with the consent of the legal owner of the property.

Print Name: AREN GALUSTIANS

Sign: 

Date: 09/13/2016

 Owner Authorized Agent

Bldg-Alter/Repair
Commercial
Plan Check

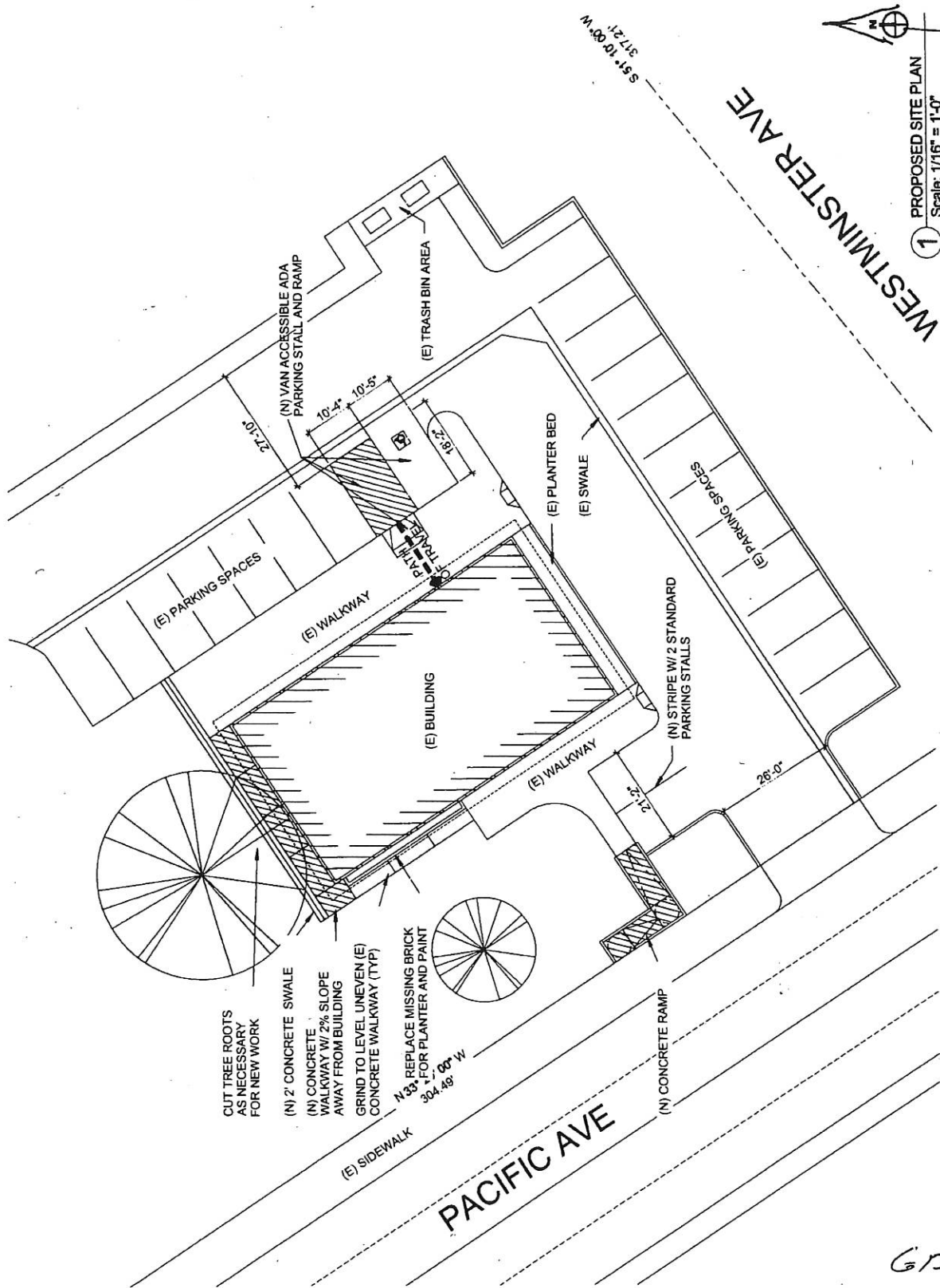
City of Los Angeles - Department of Building and Safety

Plan Check #: B16LA08264
Initiating Office: METRO
Printed on: 06/03/16 13:57:56

PLOT PLAN ATTACHMENT

1050921201618459

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



GD
9-13-16