

ATTACHMENT 6

SAFE PARKING - SAFE SHELTER PILOT PROGRAM AGENCY, PARTNER, AND PUBLIC COMMENTS RECEIVED

For Planning Commission Agenda of: March 17, 2022

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Safe Parking - Safe Shelter Pilot Program

Agency and Partner Comments Received

23-Jan-22

Commenter	Comment	Response	Subject 1	Method	Subject Abbreviations
Wiyot Tribe Representative Ted Hernandez	This looks like a great project I am adding my Tribal Administrator Michelle Vassel and our HHS Director Mr. Robert Pitts.	Add Tribal Administrator Michelle Vassel and our HHS Director Mr. Robert Pitts for future notifications on this project.	COOR	email	ADA = accessibility for persons with disabilities
Bear River Band TPHO	Would like to review sites for significant impacts when sites are selected	Contact when sites are selected	CR	email, referral	CR = Cultural resources
Public works land	The County Administrative Office is responsible for the operation of County owned parking lots, it is recommended that a referral be sent to this office. County Code Section 261.5.	Email CAO office with notification of this project.	COOR	email, referral reply	
Public works land	Condition of approval: All trash and project facilities shall be located as not to hinder safe ingress and egress from the parking lot	Included condition in Plot Plans	SITE	email, referral reply	Coor = Partner and Interagency coordination
Public works land	Condition of approval: Site visibility shall be maintained at the driveway entrance. Nothing to be pennitted in the visibility triangle area, including but not limited to fencing, temporary shelters, approved structures, restroom and shower facilities, and trash facilities. [County Code Section 341-1 et seq.]	Included condition in Plot Plans	SITE	email, referral reply	SITE = Site specifications
Public works land	Condition of approval: For proposed parking lots applicant shall be responsible to correct any involved drainage problems resulting from the project site. No drainage shall be directed to the County road right of way.	Included condition in Plot Plans	SITE	email, referral reply	HRS = Hours of operation
Public works land	Condition of approval: Only parking lots with an approved encroachment and developed to County standards shall be permitted.	Included condition in Plot Plans	SITE	email, referral reply	V = Vehicle standards

Commenter	Comment	Response	Subject 1	Method	Subject Abbreviations
Public works land	Condition of approval: If subject property is located within the municipal separate storm sewer system (MS4) boundary area, development of the property is required to comply with the MS4 permit requirements, unless determined to be exempt. The Applicant is advised to ensure that MS4 requirements for the proposed project can be achieved prior to the project being heard by the Planning Commission or Zoning Administrator. [Reference: National Pollutant Discharge Elimination System (NPDES) General Permit For Waste Discharge Requirements (WDRS) for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4S), Order No. 2013-0001-DWQ, NPDES No. CAS000004 adopted 02/0512013, Section E.12; Humboldt Low Impact Development Stormwater Manual v3.0 (08118/2021), Part A, Table 1].	Included condition in Plot Plans	SITE	email, referral reply	S = Setbacks
Public works land	A plan to keep trash and debris out of the drainage inlets and a plan to keep the area maintained is required. CASQA BMPS that apply are SC-3, SC-10, SC-11, SC-71, and SC-75.	Include condition in Plot Plans	SITE	email, referral reply	
Public works land	Lot frontage improvements to the roadway (such as paved driveway aprons, sidewalk, curb & gutter, parking lanes, lane widening, shoulder widening, road paving, curb returns, curb ramps, etc.) will typically not be required as part of this project. Lot frontage improvements are typically required when building permits (or other development permits) are requested.	N/A	SITE	email, referral reply	
Public works land	Note: Ordinance does [not, sic] appear to state or require that any provided facilities (i.e. restrooms, showers, camp sites, cabins, and parking spaces) on-site need to be ADA compliant.	Added requirement to ordinance and management plans for 20% ADA accessible units and services.	ADA	email, referral reply	

Commenter	Comment	Response	Subject 1	Method	Subject Abbreviations
Public works land	Overnight hours in section 61.05.5 (d) of the ordinance are not defined.	Hours of operation, including overnight hours, are set by the service provider in the Management Plan, and posted on site.	HRS	email, referral reply	
Public works land	Ordinance Section 61.05.4(a)ii does not state that vehicles must have current registration.	Vehicles must be operative, meaning able to drive on or off the site under its own power. Providers may either require current registration, or provide assistance. Part of services provided may be helping participants to get registration	V	email, referral reply	
Public works land	Note: Ordinance section 61.05.5(a) could be problematic for commercial properties that have unusual property line configurations. (Example would be Mill Creek Shopping Center in McKinleyville. In this case the parking lot looks like one parking area but it is actually multiple properties with reciprocal easements to allow for the ingress, egress and parking.)	Property lines would be addressed in site plan; exceptions can be clarified case by case.	S	email, referral reply	
Code Enforcement	CE opposes the project, citing the potential for abandoned vehicles that would have to be removed at the county's expense. Their recommendation is a bond of \$200 per vehicle or space posted by operators of the Safe Parking – Safe Shelter sites. Recommend a bond of \$200 per vehicle or space posted by operators of the Safe Parking – Safe Shelter sites.	Present \$200 bond per vehicle or space as an Alternative	V	phone	
Public Works email	Suggestions for Plot Plan	Include improvements in draft	S	email	
D Spoor, Arcata House Partnership	App A non-vehicle standards: raised floor - what about accessible units; 10%, 20%?	Added requirement to ordinance and management plans for 20% ADA accessible units and services.	ADA	email	

Safe Parking - Safe Shelter Pilot Program

PUBLIC Comments received

23-Jan-22

Commenter	Comment	Response	Subject 1	Method	Subject Abbreviations
<p>Janelle Egger, Fortuna</p>	<p>Summary of comments: create a tenancy agreement with participants; suggests a small fee to participants; replace 18-month duration with ongoing program with Board-appointed oversight; suggests adding a day center for 24/7/ services; advocates for campgrounds under a tenancy agreement; please provide access to emergency Housing Codes Appendix X and O.</p>	<p>The state's definition of emergency shelter specifies a limited length of stay (6 months, unless it is a Low Barrier Navigation Center). Many safe parking programs rely on grant funds for emergency shelter, so tenancy would not be applicable for the type of shelter proposed.</p>	<p>L, D</p>	<p>email</p>	<p>L= Length of stay, D = Pilot duration</p>

Re: Proposed Safe Parking - Safe Shelter Pilot Program and Shelter Crisis Ordinance

Milner, Mary <MMilner1@co.humboldt.ca.us>

Thu 1/13/2022 8:17 AM

To: ted@wiyot.us <ted@wiyot.us>

Thanks you Ted. I look forward to hearing from Michelle and Robert.

Best regards,

Mary Milner
Humboldt County Long Range Planning
707 268-3772
mmilner1@co.humboldt.ca.us

From: Ted Hernandez <ted@wiyot.us>

Sent: Wednesday, January 12, 2022 10:28 PM

To: Milner, Mary <MMilner1@co.humboldt.ca.us>

Cc: michelle@wiyot.us <michelle@wiyot.us>; Robert Pitts <rpitts@wiyot.us>; Ted Hernandez <chair@wiyot.us>

Subject: RE: Proposed Safe Parking - Safe Shelter Pilot Program and Shelter Crisis Ordinance

Good evening Mary,

This looks like a great project I am adding my Tribal Administrator Michelle Vassel and our HHS Director Mr. Robert Pitts. I know Michelle and Robert could assist you with what you need.

Hou`

Ted Hernandez

Wiyot Chairman

From: Milner, Mary <MMilner1@co.humboldt.ca.us>

Sent: Wednesday, January 12, 2022 12:29 PM

To: Ted Hernandez <ted@wiyot.us>

Subject: Re: Proposed Safe Parking - Safe Shelter Pilot Program and Shelter Crisis Ordinance

Dear Mr. Hernandez,

Attached is information about Humboldt County's proposed Safe Parking - Safe Shelter Pilot Program. We invite your comments and suggestions to improve the program and to assure that it is useful to a wide range of organizations in unincorporated areas.

Draft documents, meeting times, and more information are available at the [County's Safe Parking – Safe Shelter Pilot Program](#) web page.

Please excuse the duplication if you have already received notice of this project from our automated system. Feel free to contact Mary Milner (below) or Michael Richardson at 707 268-3723 if you have

any questions.

Sincerely,

Mary Milner
Humboldt County Long Range Planning
707 268-3772
mmilner1@co.humboldt.ca.us

FW: Project Review Request: PLN-2021-17324 Cannabis Related: No

Hilton, Keenan <KHilton@co.humboldt.ca.us>

Fri 1/14/2022 1:51 PM

To: Milner, Mary <MMilner1@co.humboldt.ca.us>

📎 1 attachments (235 KB)

1.pdf;

From: Planning Clerk <planningclerk@co.humboldt.ca.us>

Sent: Thursday, January 13, 2022 2:02 PM

To: Hilton, Keenan <KHilton@co.humboldt.ca.us>

Subject: FW: Project Review Request: PLN-2021-17324 Cannabis Related: No

Hi Keenan,

This came in the Planning Clerk's inbox. The Referral has been sent out but may not include the map. It is attached.

Thanks,
Diane

From: THPO Bear River Band <thpo@brb-nsn.gov>

Sent: Wednesday, January 12, 2022 10:25 PM

To: Planning Clerk <planningclerk@co.humboldt.ca.us>

Subject: Fwd: Project Review Request: PLN-2021-17324 Cannabis Related: No

Dear Planning Staff,

Will these parking places all be on currently paved lots, or are some planned for unpaved locations? As a *plan*, the proposal does not appear to represent an impact on cultural resources; once locations are proposed we would like to review them for potentially significant effects.

Thank you

----- Forwarded message -----

From: **Humboldt County No Reply** <noReply@co.humboldt.ca.us>

Date: Wed, Jan 12, 2022 at 11:46 AM

Subject: Project Review Request: PLN-2021-17324 Cannabis Related: No

To: <THPO@brb-nsn.gov>

Dear Partner Agency, (Bear River Band)

A permit application has been received for the following project:

Application Number: PLN-2021-17324

Description: SB2 Safe Parking Pilot

Cannabis Related: No

Parcel: 000-000-000-000

Address: No Address Listed on Permit

Please access Accela OR your Accela Citizen Access (ACA) account for the County of Humboldt to review this project and submit your response.

ACA: <https://aca.accela.com/humboldt/Default.aspx>

Thank You,

County of Humboldt Planning & Building Department

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THPO Bear River Band
TRIBAL HISTORIC PRESERVATION OFFICE

Bear River Band of the Rohnerville Rancheria

266 Keisner, Loleta, CA 95551

[707-733-1900](tel:707-733-1900) EXT 1233

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DEPARTMENT OF PUBLIC WORKS
C O U N T Y O F H U M B O L D T
MAILING ADDRESS: 1106 SECOND STREET, EUREKA, CA 95501-0579
AREA CODE 707

ON-LINE

WEB: CO.HUMBOLDT.CA.US

PUBLIC WORKS BUILDING
SECOND & L ST., EUREKA
FAX 445-7409

CLARK COMPLEX
HARRIS & H ST., EUREKA
FAX 445-7388

ADMINISTRATION	445-7491	NATURAL RESOURCES	445-7741
BUSINESS	445-7652	NATURAL RESOURCES PLANNING	267-9540
ENGINEERING	445-7377	PARKS	445-7651
FACILITY MANAGEMENT	445-7493	ROADS	445-7421

LAND USE 445-7205

LAND USE DIVISION INTEROFFICE MEMORANDUM

TO: Mary Milner, Planner, Planning & Building Department

VIA: Robert W. Bronkall, Deputy Director

FROM: Ken Freed, Assistant Engineer

DATE: 01/12/2022

RE: **SB2 SAFE PARKING PILOT, APN 000-000-000, APPS# -PLN-2021-17324**

The County Administrative Office is responsible for the operation of County owned parking lots, it is recommended that a referral be sent to this office.

The Departments recommended conditions of approval are as follows:

- (1) All trash and project facilities shall be located as not to hinder safe ingress and egress from the parking lot.
- (2) Site visibility shall be maintained at the driveway entrance. Nothing to be permitted in the visibility triangle area, including but not limited to fencing, temporary shelters, approved structures, restroom and shower facilities, and trash facilities. [County Code Section 341-1 et seq.]
- (3) For proposed parking lots applicant shall be responsible to correct any involved drainage problems resulting from the project site. No drainage shall be directed to the County road right of way.
- (4) Only parking lots with an approved encroachment and developed to County standards shall be permitted.
- (5) If subject property is located within the municipal separate storm sewer system (MS4) boundary area, development of the property is required to comply with the MS4 permit requirements, unless determined to be exempt. The Applicant is advised to ensure that MS4 requirements for the proposed project can be achieved prior to the project being heard by the Planning Commission or Zoning Administrator. [Reference: National Pollutant Discharge Elimination System (NPDES) General Permit For Waste Discharge Requirements (WDRS) for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4S), Order No. 2013-0001-DWQ, NPDES No. CAS000004

adopted 02/05/2013, Section E.12; Humboldt Low Impact Development Stormwater Manual v3.0 (08/18/2021), Part A, Table 1].

A plan to keep trash and debris out of the drainage inlets and a plan to keep the area maintained is required. CASQA BMPS that apply are SC-3, SC-10, SC-11, SC-71, and SC-75.

Informational Notes:

1. Lot frontage improvements to the roadway (such as paved driveway aprons, sidewalk, curb & gutter, parking lanes, lane widening, shoulder widening, road paving, curb returns, curb ramps, etc.) will typically not be required as part of this project. Lot frontage improvements are typically required when building permits (or other development permits) are requested.
2. Ordinance does appear to state or require that any provided facilities (i.e. restrooms, showers, camp sites, cabins, and parking spaces) on-site need to be ADA compliant.
3. "Overnight hours" in section 61.05.5 (d) of the ordinance are not defined.
4. Ordinance Section 61.05.4(a)ii does not state that vehicles must have current registration.
5. Ordinance section 61.05.5(a) could be problematic for commercial properties that have unusual proper line configurations. (Example would be Mill Creek Shopping Center in McKinleyville. In this case the parking lot looks like one parking area but it is actually multiple properties with reciprocal easements to allow for the ingress, egress and parking.)
6. The County Administrative Office is in charge of operations regarding County owned lots per County Code Section 261.5.

// END //

FW: SB2 Safe Parking Pilot

Freed, Ken <KFreed@co.humboldt.ca.us>

Thu 1/13/2022 9:13 AM

To: Milner, Mary <MMilner1@co.humboldt.ca.us>

From: Freed, Ken

Sent: Thursday, January 13, 2022 8:35 AM

To: mmilner@co.humboldt.ca.us

Subject: SB2 Safe Parking Pilot

Mary

The Department has provided comments to your referral. On a side note (obviously not as important), if your plot plan looked like a parking lot with stall pavement markings and the edge of the existing pavement it would have been more realistic. Other items noted using an APN with the correct format APN 000-123-456, having the centerline shown on the "Any Street", and I do want to note that not all streets have a 40 foot right of way and a 5 foot sidewalk. Again, not as important as the project itself!

Kenneth M. Freed

Assistant Engineer II

Humboldt County Department of Public Works – Land Use Division

3015 H Street Eureka, CA 95501

Ph (707)445-7205 Fax (707) 445-7388



Fwd: FW: Safe Parking/Safe Shelter update

Darlene Spoor <dspoor@arcatahouse.org>

Wed 12/15/2021 9:08 PM

To: Milner, Mary <MMilner1@co.humboldt.ca.us>

 1 attachments (31 KB)

DRAFT APP A_Non-vehicle Shelter Stanrds 12.8.21.docx;

Nice work Mary. I have a couple of comments.

- Tents A + B no allowance for drainage
- raised floor - what about accessible units; 10%, 20% ?
- on wooden platform or concrete. what about blacktop like parking lots?
- cabins - there is no mention of the 50 degree requirement like with tents

Just something to consider.

Darlene

Darlene A. Spoor, Ed.D.
Executive Director
Arcata House Partnership
1005 Eleventh St
Arcata, CA 95521
707-822-4528 x 111

----- Forwarded message -----

From: **Ward, Robert** <rward@co.humboldt.ca.us>

Date: Thu, Dec 9, 2021 at 12:09 PM

Subject: FW: Safe Parking/Safe Shelter update

To:

Forwarding to HTFHSC members

Robert Ward, JD

Housing and Assistance Coordinator

Humboldt County Dept. of Health and Human Services

507 F Street

Eureka, CA 95501

(707) 298-3499

From: Milner, Mary <MMilner1@co.humboldt.ca.us>
Sent: Thursday, December 9, 2021 12:08 PM
To: Ward, Robert <rward@co.humboldt.ca.us>
Subject: Safe Parking/Safe Shelter update

Hi Robert,

Attached is an Appendix to the Safe Parking/Safe Shelter management plans intended to set standards for Tents, Cabins, and Other Non-Vehicle Shelters. Feel free to share with HTFHSC and others.

This is the only major change from earlier drafts I sent around. I'm hoping to have my computer issue solved by 1:30, if not I may be calling in.

Mary Milner

Humboldt County Long Range Planning

707 268-3772

mmilner1@co.humboldt.ca.us

Re Draft Shelter Crisis & Safe Parking - Safe Tent Pilot Ordinances

Writings edited for clarity

----**November 23, 2021 Comment to County Planning Staff**

Before commenting on the drafts, at bit of background:

"Please tell us where we can go where we can live legally. A place where we can stay in bed when sick, where we can get ourselves up when we need to, where we can cook ourselves meals and work together as a community." October 2016 petition signed by 33 people at one of Eureka's rotating sleeping sites. Not delivered as the sleeping program ended abruptly a couple weeks later.

The Palco Marsh and Eureka sleeping site programs demonstrated that people can and do choose to live in sanctioned areas. The lesson from both is that police managing something they were not trained in or interested in doing is not the answer. The special homeless unit approach (Eureka's CSET) is expensive and continues to rely on a carrot (offer of services) and stick (orders to move, camping citations, drunk in public arrests) approach.

Re the County's SAFE PARKING AND SAFE TENT PILOT PROGRAM CIRCULATED DRAFT:

With hours of operation limited to overnight hours these are night shelters, not homes under a tenancy agreement.

High cost to operate as there is no charge to occupants regardless of ability to pay.

Limited impact on overall homelessness as each site limited to 20 occupants.

Limited duration requiring Board approval to renew is onerous. Even with current infusion of funding the housing shortage is not going to be resolved in 18 months. Replace with regular reports from a Board appointed body with oversight responsibility.

Adopted Housing First approach deemphasizes on-site services, demonstrates that with a place to live within the community even those suffering with mental health and/or addiction recover and are successful. Combining program services with 24/7 shelter (navigation center) is more expensive. Helpful, even necessary for some; unwanted, unnecessary for many.

The adopted Housing First policy is about having a home, a place to live. These are "overnight shelter sites".

Alternatively, the County could allow safe living sites, which "... combines the day center with a camp to address the need for a legal place to live while the affordable housing shortage can be resolved. Though located in a camp, the day center is available as a meeting place even for homeless not able to live there. The facility is not part of any other program providing services. Following the adopted Housing First approach, it is a place to live without preconditions such as participation in any programs. Another significant difference is the City's

role as lead agency through an oversight committee." July 31, 2017 cover letter to proposal in response to Chief Mills' RFP for a day center.

The Shelter Crisis code (Gov. 8698.2) is intended to provide emergency housing to protect the health and safety of people without a place to live. Instead of small, overnight shelters and program specific 24/7 navigation centers, campground(s) operated under tenancy agreement could accommodate both those in social services, mental health, addiction, employment, education, other programs AND those who do not qualify or who choose not to participate in these programs.

----December 10, 2020 email to County Planning Staff

Thanks for the info. The County has declared a Shelter Crisis, however, I have not seen or heard of any actions taken to provide emergency housing. (GOV code 8698.2(b)) Of course the last year has been focused on COVID related sheltering.

By resolution the County adopted the Housing First approach. It is also part of the Housing Element. I believe this has been mentioned as part of County grant requests. I do not know if it is mentioned in any of the draft documents prepared by the HTFHSC.

As amended in September 2020, the CA Gov Code now includes Sec. 8698.4. While this section permits homeless shelters as emergency housing, it references 2019 CA Res Code X and CA Building Code O as the minimum standards for "emergency housing or emergency housing facilities". (Gov Code 8698.4(a)(2)(A)(i)) The referenced codes are not at the CA Code Search site, can you provide a link for them?

Did the County submit the Gov Code 8698.4(a)(6)) report in January 2021, is there a draft report for January 1, 2022?

Thank you for the info on shelters, they are an important part of the system.

I am not suggesting self-governing communities.

Having spent a few years working on tenant issues; in my comments to the HTFHSC I suggested a Board Appointed oversight committee.

---- December 13, 2020 email to County Planning Staff

My attempt to download *Res Code X and CA Building Code O* only saved a link; attempt to print also failed.

I did read both and noted only minor differences between the two. Both indicate "The provisions contained in this appendix are not mandatory unless specifically referenced in the adopting ordinance"; tents are exempt from some requirements; there are only a couple requirements specific to tents, others apply to all; and in certain basic areas of health and safety "the enforcing agency" determines and/or monitors the conditions.

The definition of "enforcing agency" at a linked "up.codes" site is: "The designated department or agency as specified by statute or regulation."

Together with the definitions in App.X and App. O, it appears that the County or perhaps any governmental agency, could utilize these for a camp operated under Housing First principals. The speaker at the County's 2016(?) Housing First gathering is a mental health professional working with people suffering with mental health and/or substance abuse. His work uses existing housing and regular tenancy agreements along with a supportive counseling approach. Sometimes that approach includes "hard conversations" and/or another chance(s).

From my time in front of the Courthouse, at the designated palco marsh camp, and the sleeping sites, I can say with certainty that the people living outdoors are varied and include the uneducated and highly educated, life long poverty and economic/disaster refugees, life long Humboldt residents and those just passing through, all different political/religious persuasions, those seeking community or autonomy/personal space. All have only one thing in common, lack of housing.

We have a housing shortage. The state is trying to address the housing shortage, but it will take years, so cost and good outcomes are important.

---December 17, 2020 email to County Planning Staff

[...] However, I do thank you for the thought.

Thank you also for the printable Appendix documents. Much easier than trying to bounce back and forth on the tablet.

I think that we are addressing two approaches to addressing immediate needs: shelters and emergency housing.

We agree: "In the meantime though, all the evidence-based practices of housing first should still apply - voluntary services; harm reduction philosophy, no withholding services for sobriety, substance addiction, or lack of money." I would ADD: normal tenancy agreements as modified by current emergency laws.

Below is my attempt over the last few days to see if there is legal support for my Dec 9th email to the HHTFHSC.¹ I do not disagree that shelters and navigation centers are options. I see camps operated as emergency housing with an appointed oversight committee (group, board...?) as more in line with the County's commitment to the housing first approach.

Now for Appendix X Emergency Housing (I found only a few minor differences between it and Appendix O)--

¹ Humboldt Housing Trust Fund and Homelessness Solutions Committee, aka HTFHSC

Thank you for sending the pdfs; they appear to be what I was looking at but could not download or print. I reread these for one purpose, and that was to see if they would or could allow a campground using Housing First principals. They clearly allow a campground as emergency housing.

The definition of "Emergency Housing" in Section AX102 *Definitions* and Section AX103 *Emergency Housing* both include tents constructed per the appendix. There is an exception for tents in AX103.3 *Occupant Load*, and the time limit on tent use does not apply if raised floors with sideboards are provided. (AX106.1) "Tent" is broadly defined as "A structure, enclosure or shelter, with or without sidewalls or drops, constructed with fabric or pliable material supported by any manner except air or the contents that it protects."

AX102 *Definitions* includes: "*Emergency Housing Site*. A site containing emergency housing and emergency housing facilities supporting the emergency housing."

I did not expect and did not find anything in the Appendix X that addressed who would provide and/or manage this emergency housing. I believe that is in the Shelter Crisis codes and the appendixes address physical requirements.

CA Government Code Chapter 7.8. Shelter Crisis addresses the role of local government. It provides that a "political subdivision shall be immune from liability for ordinary negligence in the provision of emergency housing". And that "Political subdivisions may ... enact municipal health and safety standards to be operative during the housing emergency" that "apply only to additional public facilities open to the homeless pursuant to this chapter." And the "governing body may take such action as is necessary to carry out the provisions of this chapter".²

In September 2020 *Gov Code Chapter 7.8. Shelter Crisis* was amended to add Section 8698.4. It provides that "Emergency housing MAY include homeless shelters... on land owned or leased by a city, county..."³ If an ordinance setting minimum standards is passed, it must at least meet the standards in Appendix X and Appendix O and any future standards adopted by HCD "related to emergency housing or emergency housing facilities" or adopt appropriate findings.⁴ In short, the Shelter Crisis law was amended to allow shelters as long as they meet the Appendix standards for emergency housing or emergency housing facilities.

I found that neither Appendix X nor the *CA Gov Code Chapter 7.8. Shelter Crisis* address whether an emergency housing camp should operate as a shelter, program related housing (supportive/transitional housing), or as housing under a tenancy agreement. My Nov 23, 2021 email and comments at the December HTFHSC meeting were in support of a camp using the County adopted Housing First approach with tenancy and appointed oversight committee.

² Gov Code 8698.1(a) and (b) and Gov Code 8698.2(a)(1))

³ Gov Code 8698.4(a)(1), caps added

⁴ Gov Code 8698.4(a)(2)(A)(i)

Gov Code Section 8698.4 requires "a plan to transition residents from homeless shelters to permanent housing"⁵ and yearly reports regarding current numbers⁶ and new actions being taken under the shelter crisis declaration to better serve the homeless population".⁷

Gov Code Section 8698.4 has a sunset date. It "shall remain in effect only until January 1, 2026, and as of that date is repeal".⁸ This will remove "homeless shelters" leaving only "emergency housing" in *Gov Code Chapter 7.8. Shelter Crisis*.

I assume Humboldt's Dept. of Health and Human Services and/or Humboldt Housing and Homeless Coalition has the information on existing shelters and transitional housing, and programs such as mental health, addiction, job training, family reunification programs, permanent supportive housing. Again, I am suggesting camps operating under tenancy laws as modified by emergency housing law and an appointed oversight committee be added to the plan.

I would add "a place to live under tenancy laws as modified by emergency housing law" to this from your Dec 13 email: "In the meantime though, all the evidence-based practices of housing first should still apply - voluntary services; harm reduction philosophy, no withholding services for sobriety, substance addiction, or lack of money."

----January 6, 2022 email to County Planning Staff

I took a look to see if there was any possible funding and came across the Homeless Housing, Assistance, and Prevention Program; administered by the Homelessness Coordinating and Financing Council. "Humboldt County CoC" has been allocated \$2,547,368.97 and Humboldt County \$237,544.38 for FY 2021-22.

Camps as emergency housing under the shelter crisis declaration providing interim housing would address need, costs and Housing First policy. Two *possible* major stumbling blocks are current DHHS/HHHC plans and lack of buy-in from government, nonprofit and private service providers.

janelle egger

*Fortuna resident and independent activist for civil rights, open government,
and a legal place to call home for those without housing*

⁵ Gov Code 8698.4(a)(5)(C)

⁶ Gov Code 8698.4(a)(6)(A -E)

⁷ Gov Code 8698.4(a)(6)(F)

⁸ Gov Code 8698.4(d)