

1 LATHAM & WATKINS LLP  
 2 Manuel A. Abascal (SBN: 171301)  
 3 *manny.abascal@lw.com*  
 4 Katherine Sawyer (SBN: 330412)  
 5 *katherine.sawyer@lw.com*  
 6 Molly K. Wyler (SBN: 299881)  
 7 *molly.wyler@lw.com*  
 8 355 South Grand Avenue, Suite 100  
 9 Los Angeles, California 90071-1560  
 10 Telephone: +1.213.485.1234  
 11 Facsimile: +1.213.891.8763

12 Attorneys for Non-Party As *Amicus Curiae*  
 13 Union Rescue Mission

14 UNITED STATES DISTRICT COURT  
 15 CENTRAL DISTRICT OF CALIFORNIA

16 LA ALLIANCE FOR HUMAN  
 17 RIGHTS, an unincorporated  
 18 association, JOSEPH BURK,  
 19 HARRY TASHDJIAN, KARYN  
 20 PINSKY, CHARLES MALOW,  
 21 CHARLES VAN SCOY, GEORGE  
 22 FREM, GARY WHITTER, and  
 23 LEANDRO SUAREZ, individuals,

24 Plaintiffs,

25 v.

26 CITY OF LOS ANGELES, a  
 27 municipal entity; COUNTY OF LOS  
 28 ANGELES, a municipal entity; and  
 DOES 1 through 200 inclusive,

Defendants.

CASE NO. 2:20-CV-02291-DOC-KES

Assigned to Judge David O. Carter

**SETTLEMENT PROPOSAL**



## SETTLEMENT PROPOSAL

Acknowledging that housing is a human right, all parties hereby agree to the following:

1. City and County to commit to add [10,000] units of new housing (“Required Housing”) per year (“Required Housing Commitment”) for [3] years dedicated for people experiencing homelessness (“PEH”). The Required Housing shall be safe, secure, hygienic, and dignified. The Required Housing may be in the form of shelters, dormitory-style accommodations, tiny homes, trailers, modular, adaptive reuse, rapid-rehousing, long term rental assistance vouchers, permanent housing, or permanent supporting housing. Not less than 5,000 units shall be made available on or before November 1, 2021. Privately developed projects shall count towards the Required Housing Commitment if the City and/or County provide financing, loan guarantees, or other material assistance.
2. Housing being created through Proposition HHH or other existing programs shall not count towards the Required Housing commitment. The Required Housing Commitment must be met through new housing units.
3. City and County to adopt expedited approval processes for Required Housing. At a minimum, those processes should include the following:
  - a. Expedited consideration of local building requirements, including a requirement that the jurisdictions consider an updated ordinance to further reduce standards associated with vehicles, bicycles, minimum open space, and floor areas.
  - b. Waiver of fees for permits, inspections, exactions, impacts, connection and dedications by Planning Department, DBS, BOE, and DWP.
  - c. Waiver of land donation and dedication requirements.
  - d. Waiver of any traffic or street improvement obligations.
  - e. Expedited, ministerial process for Site Plan review and discretionary approvals for which the Required Housing shall be approved.
4. City and County to commit to build and fund ongoing operating and supportive services for [50,000]<sup>1</sup> units of permanent, affordable and supportive housing for PEH within [10] years (“Comprehensive Housing Commitment”). Such housing may include affordable housing, supportive housing, and other adult residential

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<sup>1</sup> Brackets denote that the amount is subject to negotiation. In no event shall the number of Comprehensive Housing Commitment units be less than the number of Required Housing Commitment units.

and specialized serviced-enriched facilities for people requiring higher levels of care.

5. City and County to adopt expedited approval processes similar to those in Paragraph 3 for Comprehensive Housing Commitment. Privately developed projects shall count as Comprehensive Housing Commitment if the City and/or County provide financing, loan guarantees, or other material assistance. Existing permanent supportive housing projects being financed through Proposition HHH shall not count towards the Comprehensive Housing Commitment.
6. City and County each to provide or to arrange to be provided at nominal or no cost [100] acres of government owned land per year for [3] years to City, County, or other third party entities who commit to build on such land housing for PEH.
7. As a subset of the Comprehensive Housing Commitment, City and County to establish 1,500 new sub-acute mental health and substance abuse beds for non-jail population and 1,500 new sub-acute beds to accommodate those with substance abuse disorders being diverted from jail.
8. By January 1, 2023, City and County to establish 500 mental health treatment beds in accordance with the County's December 3, 2019 adoption of the October 29, 2019 report issued by the Department of Mental Health to procure up to 500 mental health treatment beds. The 500 mental health treatment beds shall not count towards the Comprehensive Housing Commitment.
9. City and County to offer Required Housing and Comprehensive Housing to PEH in the City and County with priority towards the most vulnerable and those subjected to discrimination. The City and County shall work with providers to build meaningful relationships with PEH to ensure that these individuals are fully informed of their options for shelter, housing, behavioral health, substance abuse and other services. This should include standard operating procedures for street outreach and sanitation services that require alternatives to sleeping within the public right of way, such as sanctioned encampments.
10. City and County to collaborate on a Homelessness Prevention Strategy to target [50,000] households per year ("Prevention Strategy") for [10] years. The Prevention Strategy may include eviction defense services, rental assistance and other problem-solving services.
11. City and County to issue the following audits and reports:
  - a. An audit of Proposition HHH, Measure H funds and other funds received by the City and County from federal entities intended to solve or alleviate the problem of homelessness.
  - b. A report on the cost of developing affordable housing for PEH and strategies to bring such costs down.

- c. A report on the status and future of Project Homekey and Project Roomkey.
  - d. A report on the effectiveness of Los Angeles Homelessness Services Agency, with recommendations for improvement including overall system alignment between the various entities that control and fund the region's homelessness response, and are responsible for citing and developing affordable housing.
  - e. All above audits must be completed by independent auditors and background reports must be completed by experts in the field, respectively.
12. City, County and Plaintiffs to agree on a Monitor to track the progress on these measures, to facilitate progress, and to resolve disputes.