



Homeless Crisis Mitigation

City of Riverside
Office of the Mayor

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Current Policy Background

- The City Council, believing that the California Building Code (CBC) required emergency sleeping cabins to be **70 sq. ft.** for **single occupancy** and **120 sq. ft.** for **double occupancy**, adopted a local ordinance setting these as minimums for local emergency sleeping cabins (Oct 22, 2019).
- The City Council approved emergency sleeping cabins along with other options to remove barriers inhibiting the movement of people out of harsh climate conditions and safely into shelter (Dec 17, 2019).

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Clarification of State Building Code Requirements

- The Dept. of Housing and Community Development (HCD) has confirmed that the square footage requirements can be **amended by local jurisdictions** via ordinance as the Appendix X of the CBC is **optional** and was intended as a **guide**.
- The City simply needs to file the document with HCD upon approval.



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Clarification of State Building Code Requirements

- The clarification received from the HCD about the relationship between the state and city roles:

*“...cities and counties that amend Title 24 must file their ordinance with BSC, which reviews it for compliance with **Health and Safety Code Sections 17958.7 and 18941.5**. BSC then responds to the city or county letting them know their ordinance is acceptable for filing (it is important to note that **BSC does not have the authority to “approve” a local ordinance**).*

*An ordinance is effective **upon filing with BSC** (i.e. the date received by BSC) as long as the jurisdiction has complied with the requirements in Health & Safety Code Sections listed above (e.g. expressly marked changes; findings of local climate, geology, topography, etc.).”*



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Requested Changes to the Riverside City Code

- City Council is asked to consider modifications to Section 16.34.040 of the Riverside City Code to decrease the minimum number of square feet of interior space for emergency sleeping cabins from 70 sq. ft. to 64 sq. ft. for single occupancy *and* 120 sq. ft. to 64 sq. ft. *or* 100 sq. ft. for double occupancy.
- These changes would continue to meet health and safety standards.



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Reasons for the Requested Changes

- Action is required to preserve life, health and property:
 - **Human lives are at risk**
 - 95 homeless individuals died in Riverside County in 2019
 - Average age = 48
 - 11 were on a wait list for housing
 - 22 of these individuals were residents of the City of Riverside
- Action is needed to expedite solutions; our community is demanding action.
 - Pallet, the company approved to provide the emergency sleeping cabins, can deploy 64 square foot shelters immediately.
 - They also offered to loan the city 10 additional 64 square foot units at no cost for the winter months.
 - If the city decides to proceed with larger options, there is a 8-10 week manufacturing lead time.



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Reasons for the Requested Changes

- **More responsible use of resources**
 - Depending on the option selected by the City Council, the following cost savings could be achieved:

	Cost Per Unit	20 Units	10 Loan Units	People Housed	City Cost Per Person Housed With In Kind Factored
Existing Language 100 sq. ft. single	\$7,674.40	\$153,488	NA	20	\$7,674.40
Single Occupancy 64 sq. ft. single	\$5,345.20	\$108,704	\$53,452 In Kind	30	\$3,623.47
Double Occupancy Option A 64 sq. ft. double	\$5,760.10	\$115,202	\$57,601 In Kind	60	\$1,920.04
Double Occupancy Option B 100 sq. ft. double	\$7,999.30	\$159,986	NA	40	\$3,999.65



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Operational Proof of Concept

- The City of Tacoma, WA has been operating a cabin village with 64 sq. ft Pallet Shelters since 2017.
- Tacoma’s cabin communities have seen a 40% success rate in moving residents from transitional shelters to permanent housing.



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Urgency Proof of Concept

Date	Action Steps
Jan 14, 2020	Sonoma County voted to purchase thirty 64 sq. ft single occupancy Pallet Shelters and thirty 100 sq. ft for double occupancy
Jan 16, 2020	64 sq. ft shelters deployed
Jan 18, 2020	Move in day – 16 clients
Jan 27, 2020	Full occupancy goal



Code Proof of Concept

City of Riverside would not be the first:

- On January 14, 2020, Sonoma County purchased 30 units of 64 square foot Pallet emergency sleeping cabins to be used for single occupancy, to be deployed by January 16, 2020, with move in beginning January 18, 2020 and a goal to fill occupancy by January 27.
- Sonoma issued a directive that their Permit and Resource Management Department not pursue any violation complaints related to the placement or occupancy of emergency housing units on County property until their code is amended.
- Sonoma has set a precedent for the interpretation of the recommended state code and the model for amending it to meet the current urgent need being experienced statewide.



Setting Precedent For Amending This Code

- Sonoma issued a directive that their Permit and Resource Management Department not pursue any violation complaints related to the placement or occupancy of emergency housing units on County property until their code is amended.
- Sonoma has set a precedent for the interpretation of the recommendations from Appendix X and the model for amending local code to meet the urgent need in our communities.



Shelter Compliance with other Code Requirements

Emergency Sleeping Cabin Requirement Section 16.34.040	Pallet Shelter
General. (Emergency sleeping cabins shall have an interior floor area of not less than 70 square feet for one occupant and an additional 50 sq. ft. for each occupant in excess of one)	
Live loads. (Emergency sleeping cabins shall be designed to resist intrusion of wind, rain, and to support live loads)	✓
Minimum ceiling height. (Habitable space and hallways in emergency sleeping cabins shall have a ceiling height of not less than 80 inches)	✓
Means of egress. (Emergency sleeping cabins shall be provided with at least two forms of egress placed remotely from each other.)	✓
Egress window. (The bottom of the clear opening of the egress window shall not be more than 44 inches (1118 mm) above the floor)	✓
Plumbing and gas service. (If an emergency sleeping cabin contains plumbing or gas service)	NA
Electrical. (Emergency sleeping cabins shall be provided with a continuous source of electricity, at least one interior lighting fixture, electrical heating equipment, and at least one GFCI-protected receptacle outlet for use by the occupant)	✓
Ventilation. (Emergency sleeping cabins shall be provided with means of ventilation (natural and/or mechanical) allowing for adequate air replacement)	✓
Smoke alarms. (Emergency sleeping cabins shall be provided with at least one smoke alarm installed in accordance with the California Residential Code, Section R314)	✓
Carbon monoxide alarms. (If an emergency sleeping cabin contains a fuel-burning appliance(s) or a fireplace(s), a carbon monoxide alarm shall be installed)	✓



ADA Compliance

Guidance provided by the Office of the State Architect:

- CBC Section 11B-224.8 - transient lodging guest rooms and social center establishments states there must be a minimum of **5% of units**, and **no less than one unit**, that **comply with ADA** standards.
- CBC Section 11B-233.3.1.3 states that at least **2% of the units**, but **no less than one**, must provide **communication including strobes** for any fire or **carbon monoxide alarms** and for the **primary doorbell**.
- The US Access Board confirmed that, if there are **fewer than 10** occupants in a cabin, there **do not need to be two ADA accessible means of egress**.
- Minimal changes would be need to be made **in a single unit** to ensure full ADA compliance.



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Risk Analysis

- Sonoma County's bold action is the result of the increasing wildfire risk. Riverside shares this risk.
- Some are arguing that we can't deploy a solution that is not widely accepted, because the city may get sued.
- The entire homeless situation poses risks, but the largest risk is inaction.



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Recommendations

That City Council:

1. Determine that the minimum 70 square feet recommended floor area for single occupancy and minimum 120 square feet recommended floor area for double occupancy for emergency sleeping cabins significantly delays the city's ability to move people out of harsh climates and safely into shelter with an accelerated timeline and is counterproductive to the City Council's intent in declaring a shelter crisis.
2. Direct staff to prepare an ordinance to amend Section 16.34.040 of the Riverside Municipal Code to decrease the minimum number of square feet of interior space for **single occupancy** emergency sleeping cabins to 64 square feet, and;



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Recommendations Continued

3. Direct staff to prepare an ordinance to amend Section 16.34.040 of the Riverside Municipal Code to either:
 - Double Occupancy Option 1 – Decrease the minimum number of square feet of interior space for double occupancy sleeping cabins to 64 square feet, or;
 - Double Occupancy Option 2 – Decrease the minimum number of square feet of interior space for double occupancy sleeping cabins to 100 square feet.
4. Adopt a resolution directing the Planning Division and Code Enforcement Department not to pursue any violation complaints related to the placement or occupancy of emergency housing units on Designated Public Facilities property until the Riverside Municipal Code, Section 16.34.040 is amended.



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Recommendations Continued

5. Direct staff to submit a copy of this updated ordinance to the California Buildings Standards Commission (BSC).
6. Approve an accelerated timeline to deploy emergency sleeping cabins to be operational by January 31, 2020



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