

1 UMHOFFER, MITCHELL & KING LLP
2 Matthew Donald Umhofer (SBN 206607)
3 Elizabeth A. Mitchell (SBN 251139)
4 767 S. Alameda St., Suite 221
5 Los Angeles, California 90017
6 Telephone: (213) 394-7979
7 Facsimile: (213) 529-1027
8 mumhofer@umklaw.com
9 emitchell@umklaw.com

10 *Attorneys for Plaintiffs*

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 LA ALLIANCE FOR HUMAN
14 RIGHTS, *et al.*,

15 Plaintiffs,

16 v.

17 CITY OF LOS ANGELES, *et al.*,

18 Defendants.

Case No. 2:20-CV-02291-DOC-KES

Assigned to Judge David O. Carter

**NOTICE OF FILING RESPONSE
TO THE COURT'S REQUEST BY
PLAINTIFF LA ALLIANCE FOR
HUMAN RIGHTS**

Before: Hon. David O. Carter
Courtroom: 10A
Hearing Date: March 4, 2024
Hearing Time: 8:30 p.m.

1 **TO THE COURT, ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF**
2 **RECORD:**

3 PLEASE TAKE NOTICE that pursuant to the Court’s request, Plaintiff LA
4 Alliance for Human Rights hereby responds to the court’s request for accurate HUD
5 data presented at the March 18, 2024, proceedings.

6
7 Dated: March 25, 2024

Respectfully submitted,

8 /s/ Elizabeth A. Mitchell

9 UMHOFER, MITCHELL & KING, LLP

10 Matthew Donald Umhofer

11 Elizabeth A. Mitchell

12 *Attorneys for Plaintiffs*

13 4891-3263-7361, v. 2
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March 22, 2024

The Honorable David O. Carter
United States District Court
Central District of California
411 West Forth Street, Room 9-160
Santa Ana, CA 92701



RE: Case No: LA CV 20-02291-DOC-(KESx) California and Municipal Homelessness Data

Dear Judge Carter,

I am responding to your request to review data included in the Civil Minutes of court proceedings on March 18, 2024. I reviewed the Increase in Unhoused Population data and compared it to my analysis of HUD Point In Time count data. My source for the HUD PIT data can be found at <https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

Very few if any municipalities collect their own data and most rely on their regional Continuums of Care to provide such data. In California, almost all Continuums of Care are housed within the counties. The notable exceptions are LAHSA and the Long Beach and Pasadena / Glendale CoCs.

Unfortunately due to the COVID pandemic, 2021 data is consistently flawed as HUD gave CoCs an option to forgo the in-person street-level count. Few if any CoC chose to do so resulting in consistently low or missing data in all subpopulations for 2021.

Below I've displayed the HUD data on the left and the data included in the Civil Minutes on the right. In addition, I've included ten-year data tables for the select counties that include federal CoC awards, counts of chronic and unsheltered PEH, and counts of PEH with mental illness and substance use disorder, and the percentage of increase yearly and for the ten-year period.

Thank you for the opportunity to share my analysis with the court.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Webster".

Paul Webster
Executive Director
LA Alliance for Human Rights

HUD Point In Time Data

Los Angeles City and County

Year	PIT Count	+/-	% Chng PIT
2017	52,442		
2018	49,995	-2,447	-5%
2019	56,257	6,262	13%
2020	63,706	7,449	13%
2021			
2022	65,111	65,111	2%
2023	71,320	6,209	10%
Total		18,878	24%

Civil Minutes Data

Los Angeles County

Year	PIT Count	+/-	% Chng PIT
2017			
2018	52,765		
2019	58,936	6,171	12%
2020	66,433	7,497	13%
2021			
2022	69,144	69,144	4%
2023	75,518	6,374	9%
Total		75,518	31%

Santa Ana Anaheim Orange County, CA

Year	PIT Count	+/-	% Chng PIT
2017	4,792		
2018	4,955	163	3%
2019	6,860	1,905	38%
2020	6,978	118	2%
2021			
2022	5,718	5,718	-18%
2023	6,050	332	6%
Total		1,258	19%

Orange County, CA

Year	PIT Count	+/-	% Chng PIT
2017			
2018			
2019	6,860		
2020	6,978	118	2%
2021			
2022	5,718	-1,260	-18%
2023			
Total		-1,142	-17%

San Francisco, CA

Year	PIT Count	+/-	% Increase
2017	6,858		
2018	6,857	-1	0%
2019	8,035	1,178	17%
2020	8,124	89	18%
2021			
2022	7,754	7,754	-5%
2023	7,582	-172	-6%
Total		724	11%

San Francisco, CA

Year	PIT Count	+/-	% Increase
2017	6,858		
2018			
2019	8,035	1,177	17%
2020			
2021			
2022	7,754	-281	-3%
2023			
Total		896	13%

HUD Point In Time Data

San Diego City and County

Year	PIT Count	+/-	% Increase
2017	9,160		
2018	8,576	-584	-6%
2019	8,102	-474	-6%
2020	7,638	-464	-6%
2021			
2022	8,427	8,427	10%
2023	10,264	1,837	22%
Total		1,104	12%

Civil Minutes Data

San Diego City and County

Year	PIT Count	+/-	% Increase
2017			
2018			
2019	8,102		
2020			
2021			
2022	8,427	8,427	4%
2023	10,264	1,837	22%
Total		2,162	27%

Riverside County

Year	PIT Count	+/-	% Increase
2017	2,406		
2018	2,316	-90	-4%
2019	2,811	495	21%
2020	2,884	73	3%
2021			
2022	3,316	3,316	15%
2023	3,725	409	12%
Total		1,319	38%

Riverside County

Year	PIT Count	+/-	% Increase
2017			
2018			
2019	2,811		
2020	2,884	73	3%
2021			
2022	3,316	432	15%
2023	3,725	409	12%
Total		914	33%

San Bernadino County

Year	PIT Count	+/-	% Increase
2017	1,866		
2018	2,118	252	14%
2019	2,608	490	23%
2020	3,125	517	20%
2021			
2022	3,333	3,333	7%
2023	4,195	862	26%
Total		2,329	79%

San Bernadino

Year	PIT Count	+/-	% Increase
2017			
2018	2,118		
2019	2,608	490	23%
2020	3,125	517	20%
2021			
2022	3,333	208	7%
2023	4,195	862	26%
Total		2,077	57%

HUD Point In Time Data

Oxnard Buena Ventura County

Year	PIT Count	+/-	% Increase
2017	1,152		
2018	1,308	156	14%
2019	1,669	361	28%
2020	1,787	118	7%
2021			
2022	2,248	2,248	26%
2023	2,441	193	9%
Total		1,289	95%

Sacramento City and County

Year	PIT Count	+/-	% Increase
2017	3,665		
2018	3,621	-44	-1%
2019	5,561	1,940	54%
2020	5,511	-50	-1%
2021			
2022	9,278	9,278	68%
2023	9,281	3	0%
Total		5,616	153%

Oakland Berkely Alameda County

Year	PIT Count	+/-	% Increase
2017	5,629		
2018	5,496	-133	-2%
2019	8,022	2,526	46%
2020	8,137	115	1%
2021			
2022	9,747	9,747	20%
2023	9,789	42	0%
Total		4,160	73%

Civil Minutes Data

Ventura

Year	PIT Count	+/-	% Increase
2017			
2018			
2019	1,669		
2020	1,787	118	7%
2021			
2022	2,238	569	25%
2023	2,441	203	9%
Total		772	46%

Sacramento

Year	PIT Count	+/-	% Increase
2017	3,665		
2018			
2019	5,570	1,905	52%
2020			
2021			
2022	9,278	3,708	67%
2023			
Total		5,613	153%

Oakland

Year	PIT Count	+/-	% Increase
2017	2,761		
2018			
2019	4,071	1,310	47%
2020			
2021			
2022	5,055	984	24%
2023			
Total		2,294	83%

10 Year HUD Point In Time Data Trends 2014 -2023

California

Year	CoC Award	% Chng \$	PIT Count	% Chng PIT	Chronic	% Chng Chi	Unsheltere	% Increase	MI	% Chng MI	SUD	% Chng SU
2014	\$307,573,759		113,952		31,078		71,437		32,215		29,090	
2015	\$337,651,863	10%	115,738	2%	32,227	4%	76,699	7%	29,496	0%	27,247	-6%
2016	\$353,937,202	5%	118,142	2%	31,548	-2%	78,390	2%	31,248	7%	27,078	-1%
2017	\$382,567,077	8%	134,278	14%	37,360	18%	91,642	17%	34,673	10%	24,500	-10%
2018	\$415,290,908	9%	129,972	-3%	34,332	-8%	86,543	-6%	32,168	-7%	22,475	-8%
2019	\$441,164,621	6%	151,278	16%	41,557	21%	108,432	25%	34,942	9%	26,410	18%
2020	\$491,195,402	11%	161,548	7%	51,785	25%	113,660	5%	37,599	8%	35,821	36%
2021	\$509,247,505	4%	-	-	-	-	-	-	-	-	-	-
2022	\$525,839,973	3%	171,521	6%	60,905		115,491	2%	39,721		36,096	
2023			181,399	6%	71,150		123,423	7%	45,222		43,047	
Total	\$2,421,807,073	56%		59%		96%		73%		23%		24%

Los Angeles, CA

Year	CoC Award	% Chng \$	PIT Count	% Chng PIT	Chronic	% Chng Chi	Unsheltere	% Increase	MI	% Chng MI	SUD	% Chng SU
2014	\$91,956,831		34,393		8,882		22,590		8,978		7,947	
2015	\$100,267,671	9%	41,174	20%	14,173	60%	28,948	28%	10,872	58%	8,721	10%
2016	\$104,971,653	5%	43,854	7%	13,468	-5%	32,781	13%	13,006	24%	9,941	14%
2017	\$109,398,295	4%	52,442	20%	16,576	23%	41,216	26%	14,914	11%	8,797	-12%
2018	\$123,707,061	13%	49,995	-5%	13,275	-20%	35,570	-14%	12,103	-19%	6,677	-24%
2019	\$133,955,902	8%	56,257	13%	15,538	17%	42,471	19%	12,869	6%	7,264	9%
2020	\$150,913,363	13%	63,706	13%	24,482	58%	46,090	9%	14,125	10%	15,203	109%
2021	\$155,356,351	3%	-	-	-	-	-	-	-	-	-	-
2022	\$157,847,769	2%	65,111	2%	26,985	10%	45,878	0%	14,067	0%	15,353	1%
2023			71,320	10%	31,991	19%	52,307	14%	15,868	13%	19,077	24%
Total	\$723,213,945	51%		107%		260%		132%		57%		83%

Orange County, CA

Year	CoC Award	% Chng \$	PIT Count	% Chng PIT	Chronic	% Chng Chi	Unsheltered	% Increase	MI	% Chng MI	SUD	% Chng SU
2015	\$22,025,895		4,452		580		2,201		475		458	
2016	\$22,354,847	1%	4,319	-3%	716	23%	2,201	0%	493	51%	407	-11%
2017	\$23,458,682	5%	4,792	11%	893	25%	2,584	17%	474	-34%	361	-11%
2018	\$24,073,151	3%	4,955	3%	1,066	19%	2,584	0%	600	27%	483	34%
2019	\$26,143,204	9%	6,860	38%	2,562	140%	3,961	53%	1,660	177%	1,800	273%
2020	\$28,994,963	11%	6,978	2%	2,810	10%	3,961	0%	1,532	-8%	1,745	-3%
2021	\$30,789,905	6%	-	-	-	-	-	-	-	-	-	-
2022	\$31,453,663	2%	5,718	-18%	2,463	-12%	3,057	-23%	1,445	-6%	1,633	-6%
2023			6,050	6%	2,527	3%	3,057	0%	1,623	12%	1,796	10%
Total	\$209,294,310	43%		28%		325%		39%		204%		257%

San Francisco, CA

Year	CoC Award	% Increase	PIT Count	% Increase	Chronic	% Chng Chi	Unsheltered	% Increase	MI	% Chng MI	SUD	% Chng SU
2014	\$25,648,425		6,408		2,321		4,315		2,543		1943	
2015	\$30,968,697	21%	6,775	6%	1,629	-30%	4,358	1%	1,001	-36%	2319	19%
2016	\$32,166,774	4%	6,996	3%	1,932	19%	4,358	0%	1,408	93%	2642	14%
2017	\$41,476,960	29%	6,858	1%	2,138	11%	4,353	0%	4,749	146%	2610	-1%
2018	\$44,537,520	7%	6,857	-2%	1,757	-18%	4,353	0%	4,836	2%	2910	11%
2019	\$47,849,533	7%	8,035	17%	3,030	72%	5,180	19%	2,368	-51%	2227	-23%
2020	\$52,839,360	10%	8,124	18%	2,837	-6%	5,180	0%	1,867	-21%	1968	-12%
2021	\$51,403,408	-3%	-	-	-	-	-	-	-	-	-	-
2022	\$53,021,237	3%	7,754	-5%	2,691	-5%	4,397	-15%	2,162	16%	2051	4%
2023			7,582	-6%	2,520	-6%	4,397	0%	2,099	-3%	2017	-2%
Total	\$249,838,844	107%		21%		16%		2%		87%		-15%

CA-601 San Diego City and County

Year	CoC Award	% Increase	PIT Count	% Increase	Chronic	% Increase	Unsheltere	% Increase	MI	% Increase	SUD	% Increase
2014	\$16,170,164		8,506		1,245		3,985		3,408		1,980	
2015	\$17,859,969	10%	8,742	3%	1,689	36%	4,156	4%	1,550	-55%	1226	-38%
2016	\$18,229,194	2%	8,669	-1%	1,417	-16%	4,940	19%	1,504	-3%	1376	12%
2017	\$20,035,551	10%	9,160	6%	2,176	54%	5,621	14%	662	-56%	726	-47%
2018	\$21,394,691	7%	8,576	-6%	2,171	0%	4,990	-11%	1,181	78%	1044	44%
2019	\$23,876,026	12%	8,102	-6%	1,712	-21%	4,476	-10%	1,335	13%	789	-24%
2020	\$28,814,796	21%	7,638	-6%	1,519	-11%	3,971	-11%	1,063	-20%	870	10%
2021	\$29,250,827	2%	-		-		-		-		-	
2022	\$33,008,616	13%	8,427	10%	1,414	-7%	4,106	3%	1,093	3%	778	-11%
2023			10,264	22%	3,516	149%	5,171	26%	2,344	114%	1,758	126%
Total	\$130,210,227	104%		21%		182%		30%		-31%		-11%

Riverside County

Year	CoC Award	% Increase	PIT Count	% Increase	Chronic	% Chng Chi	Unsheltere	% Increase	MI	% Chng MI	SUD	% Chng SU
2014	\$9,857,934		2,945		1,093		1,888		587		637	
2015	\$9,289,429	-6%	2,372	-19%	532	-51%	1,488	-21%	502	-14%	916	44%
2016	\$9,912,027	7%	2,165	-9%	378	-29%	1,351	-9%	484	-4%	780	-15%
2017	\$9,978,890	1%	2,406	11%	418	11%	1,638	21%	483	0%	754	-3%
2018	\$10,106,803	1%	2,316	-4%	387	-7%	1,685	3%	467	-3%	700	-7%
2019	\$10,281,317	2%	2,811	21%	804	108%	2,045	21%	515	10%	557	-20%
2020	\$11,110,969	8%	2,884	3%	1,007	25%	2,155	5%	811	57%	833	50%
2021	\$13,763,437	24%	-		-		-		-		-	
2022	\$14,224,792	3%	3,316	-58%	816	-19%	1,980	-8%	477	-41%	473	-43%
2023			3,725	12%	921	13%	2,441	23%	503	5%	580	23%
Total	\$49,568,466	44%		26%		-16%		29%		-14%		-9%

San Bernadino

Year	CoC Award	% Increase	PIT Count	% Increase	Chronic	% Chng Ch	Unsheltere	% Increase	MI	% Chng MI	SUD	% Chng SU
2014	\$6,962,571		2,315		551		1,247		305		292	
2015	\$9,366,053	35%	2,149	-7%	564	2%	1,311	5%	361	18%	362	24%
2016	\$10,339,584	10%	1,887	-12%	405	-28%	1,191	-9%	294	-19%	348	-4%
2017	\$10,415,784	1%	1,866	-1%	441	9%	1,179	-1%	307	4%	364	5%
2018	\$10,141,456	-3%	2,118	14%	423	-4%	1,443	22%	288	-6%	379	4%
2019	\$10,622,832	5%	2,608	23%	767	81%	1,920	33%	437	52%	447	18%
2020	\$11,662,078	10%	3,125	20%	760	-1%	2,390	24%	528	21%	535	20%
2021	\$14,825,115	27%	905	-71%	-		-		-		-	
2022	\$14,808,627	0%	3,333	268%	1,115	47%	2,389	0%	839	59%	473	-12%
2023			4,195	26%	1,437	29%	2,976	25%	820	-2%	948	100%
Total	\$50,885,709	113%		81%		161%		139%		169%		225%

Ventura

Year	CoC Award	% Increase	PIT Count	% Increase	Chronic	% Chng Ch	Unsheltere	% Increase	MI	% Chng MI	SUD	% Chng SU
2014	\$1,896,944		1,428		440		910		314		300	
2015	\$1,970,367	4%	1,417	-1%	523	19%	957	5%	261	-17%	313	4%
2016	\$2,174,740	10%	1,271	-10%	303	-42%	777	-19%	201	-23%	205	-35%
2017	\$2,291,894	5%	1,152	-9%	385	27%	664	-15%	183	-9%	186	-9%
2018	\$2,290,478	0%	1,308	14%	387	1%	830	25%	314	72%	277	49%
2019	\$2,258,458	-1%	1,669	28%	324	-16%	1,258	52%	407	30%	308	11%
2020	\$2,504,049	11%	1,787	7%	429	32%	1,265	1%	371	-9%	557	81%
2021	\$3,435,065	37%	-		-		-		-		-	
2022	\$3,434,832	0%	2,248	26%	628	46%	1,356	7%	555	50%	613	10%
2023			2,441	9%	1,112	77%	1,633	20%	490	-12%	692	13%
Total	\$10,985,937	81%		71%		153%		79%		56%		131%

Sacramento

Year	CoC Award	% Increase	PIT Count	% Increase	Chronic	% Chng Chi	Unsheltere	% Increase	MI	% Chng MI	SUD	% Chng SU
2014	\$18,719,062		2,449		422		786		713		927	
2015	\$19,138,664	2%	2,659	9%	502	19%	948	21%	581	-19%	553	-40%
2016	\$19,511,838	2%	2,500	-6%	540	8%	948	0%	410	-29%	253	-54%
2017	\$20,180,083	3%	3,665	47%	1,126	109%	2,052	116%	1,092	166%	629	149%
2018	\$20,915,190	4%	3,621	-1%	1,192	6%	2,052	0%	1,062	-3%	550	-13%
2019	\$23,349,292	12%	5,561	54%	1,641	38%	3,900	90%	1,051	-1%	518	-6%
2020	\$27,063,723	16%	5,511	-1%	1,727	5%	3,900	0%	1,008	-4%	499	-4%
2021	\$29,713,497	10%	-		-		-		-		-	
2022	\$30,512,102	3%	9,278	68%	4,314	150%	6,664	71%	2,716	169%	1,281	157%
2023			9,281	0%	4,341	1%	6,664	0%	2,784	3%	1,317	3%
Total	\$103,095,067	63%		279%		929%		748%		290%		42%

Oakland

Year	CoC Award	% Increase	PIT Count	% Increase	Chronic	% Chng Chi	Unsheltere	% Increase	MI	% Chng MI	SUD	% Chng SU
2014	\$27,195,702		4,272		1,094		2,337		1,193		1,313	
2015	\$28,980,863	7%	4,040	-5%	750	-31%	2,397	3%	714	-40%	415	-68%
2016	\$33,998,867	17%	4,145	3%	753	0%	2,397	0%	817	14%	455	10%
2017	\$35,327,971	4%	5,629	36%	1,707	127%	3,863	61%	1,622	99%	945	108%
2018	\$37,648,221	7%	5,496	-2%	1,742	2%	3,863	0%	1,499	-8%	862	-9%
2019	\$36,369,614	-3%	8,022	46%	2,236	28%	6,312	63%	2,590	73%	1,897	120%
2020	\$39,150,229	8%	8,137	1%	2,437	9%	6,312	0%	2,648	2%	1,943	2%
2021	\$40,087,543	2%	-		-		-		-		-	
2022	\$42,269,362	5%	9,747	20%	2,728	12%	7,135	13%	2,348	-11%	1,251	-36%
2023			9,789	0%	2,805	3%	7,135	0%	2,393	2%	1,417	13%
Total	\$172,325,536	55%		129%		156%		205%		101%		8%