

Dock, Joel

From: Dock, Joel
Sent: Friday, April 25, 2025 4:20 PM
To: Natalie Harris
Subject: RE: Homeless and Crisis Shelter Zoning Rule Changes

What I stated verbally is codified in another section of the LDC concerning "nonconformance" or uses in existence prior to changes being allowed to continue until such time as they are expanded or enlarged and then they must comply. I'll either referen this in the staff report or note in the regs.

Thanks,

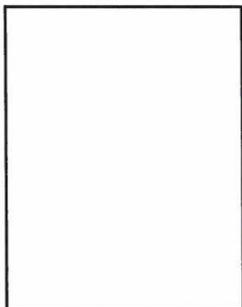
Joel P. Dock, AICP
Planning Manager
502-574-5860

From: Natalie Harris <nharris@louhomeless.org>
Sent: Thursday, April 24, 2025 5:04 PM
To: Dock, Joel <Joel.Dock@louisvilleky.gov>
Subject: Re: Homeless and Crisis Shelter Zoning Rule Changes

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I just realized I had another question. Will there be something in writing in the policy that states that the new shelter requirements are for new or renovated facilities after 2025? I worry about what happens when staff there now change and that is lost from memory.

Thanks!



Natalie Harris
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Louisville, KY 40208
(502) 636-9550 ext. 1212
Achiever, Consistency, Discipline, Focus and Responsibility

On Tue, Mar 25, 2025 at 4:11 PM Dock, Joel <Joel.Dock@louisvilleky.gov> wrote:

Thanks to each of you for participating in last years listening sessions on homeless and crisis shelters. After much consideration, a summary of proposed changes to the LDC for Homeless and Crisis Shelters has been published and is attached to this email. Please review and submit any comments [HERE](#).

PROPOSED CHANGES TO THE LAND DEVELOPMENT CODE FOR HOMELESS AND CRISIS SHELTERS (24-LDC-0001)

The Louisville Metro Office of Planning published proposed changes to the Land Development Code (LDC) for Homeless and Crisis Shelters as directed by Resolution No. 019, Series 2024 on March 25, 2025. This resolution requested that the Planning Commission (Office of Planning) review the Metro LDC regulations concerning Homeless Shelters and Crisis Shelters and consider changes to “permit more Homeless Shelters with Standards instead of requiring a Conditional Use Permit and to create an option for Temporary Crisis Shelters for when there is a temporary but urgent need for additional shelter space.”

The Office of Planning presented research findings, including a peer city review to the Louisville Metro Council on May 7, 2024 and followed up with five (5) Community Listening Sessions in August/September of 2024.

A summary of the proposed changes is available online [HERE](#). Please share with others and submit comments or questions online [HERE](#). Also, don't forget to visit the Office of Planning online at <https://louisvilleky.gov/planning> to learn more about these changes and much more!

To speak directly with a planner, please contact Joel Dock at (502)574-5860 or joel.dock@louisvilleky.gov.

Joel P. Dock, AICP

Planning Manager

Office of Planning

Louisville Metro Government

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PLANNING

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Learn more about Land Development Code Reform here: <https://louisvilleky.gov/ldcreform>

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Dock, Joel

From: Dock, Joel
Sent: Thursday, April 17, 2025 2:16 PM
To: Natalie Harris
Subject: RE: Official Response to Homeless and Crisis Shelters LDC and meeting recap

Existing facilities will not be required to comply. They would be legally nonconforming to any future adopted standards. Only new facilities will be required to comply. Overnight shelters subject to current licensing requirements provide a plan with their license application.

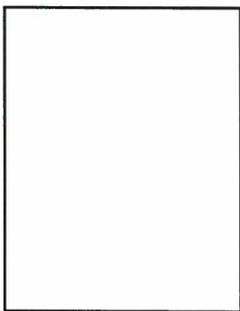
I also spoke with Construction Review and they have the same thoughts as you on the difficulties for religious institutions to obtain a license. We will work on this process to make it easier. I'll keep you posted on that.

Joel P. Dock, AICP
Planning Manager
502-574-5860

From: Natalie Harris <nharris@louhomeless.org>
Sent: Thursday, April 17, 2025 2:12 PM
To: Dock, Joel <Joel.Dock@louisvilleky.gov>
Subject: Re: Official Response to Homeless and Crisis Shelters LDC and meeting recap

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Good to know. Will existing day shelters that are now considered community service facilities be required to have a grounds management plan and schedule? And will existing overnight shelters be required to do that? I think that is the remaining concern of the existing shelters.



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On Thu, Apr 17, 2025 at 12:12 PM Dock, Joel <Joel.Dock@louisvilleky.gov> wrote:

Natalie,

I sorted out the day shelters matter of 2010 and here is what I found:

- A new category was created to accommodate this use called "Community Service facility." It is permitted in the office zones and higher and as a conditional use permit in residential zones. It does not accommodate religious buildings or other nonresidential spaces currently in existence but zoned incorrectly.
- The proposed regulation for day shelters expands beyond these allowances and does not impact any existing operators that are operating in these zones as they would already be permitted.
- The proposed regulation is specific to houseless services and expands permitted locations by-right
- A CUP provides an additional option for Community Service facility or day shelters.
- I mentioned that our office could make an interpretation on day shelters which may result in limitations. The interpretation would have been that day shelters are community service facilities. With this additional background that interpretation isn't needed.

In summary, the proposal expands opportunity. It does not hinder or further restrict with the exception of the separation requirements, which I am working on now.

Joel P. Dock, AICP

Planning Manager

502-574-5860

From: Natalie Harris <nharris@louhomeless.org>

Sent: Thursday, April 10, 2025 12:26 PM

To: Dock, Joel <Joel.Dock@louisvilleky.gov>

Subject: Re: Official Response to Homeless and Crisis Shelters LDC and meeting recap

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Thank you!

Dock, Joel

From: Natalie Harris <nharris@louhomeless.org>
Sent: Wednesday, April 9, 2025 7:37 PM
To: Ruhe, Betsy; Dock, Joel; George Eklund; Rezai, Ashkan
Subject: Official Response to Homeless and Crisis Shelters LDC and meeting recap

CAUTION: This email came from outside of Louisville Metro. Do not click links, open attachments, or give away private information unless you recognize the sender's email address and know the content is safe.

Dear Councilwoman Ruhe, Joel Dock and Ashkan Rezai,

Thank you for meeting with us yesterday about the proposed changes to the land development code. I wanted to follow up with an official listing of the concerns of the Coalition for the Homeless and our 40 plus member agencies:

1) Under Amendment #4 B, we expressed concern that extreme weather shelters must close within 24 hours when more extreme weather is seen in the forecast. Joel explained that this can be addressed through authorization to stay open by the Planning Director.

2) Under Amendment #2 H and Amendment #4 D, we expressed concern about two existing requirements for licensing of these temporary shelters now required for overnight shelter licensing:

First, existing licensing requirements include full drawings of the building which make sense to change the permanent use of the facility but not for a temporary use. Most religious buildings and other facilities that have operated without major operations do not have these and cannot afford the cost or time to have these created for a temporary use.

Second, the existing licensing requirements include a requirement to list every staff member and volunteer along with information on background checks. Most temporary shelters under #2 or #4 will not know who will be volunteering and cannot provide this information although they can require multiple volunteers to ensure oversight. Joel agreed to go back to Louisville departments to address these barriers not addressed in the Amendments.

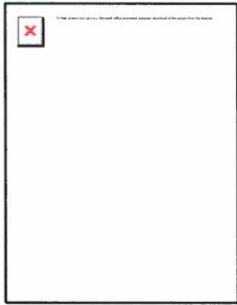
3) Our biggest concern, however, is what appears to be a singling out of Day Shelters now included in the addition of Amendment #1 and H 6 under amendment #5 to existing homeless shelter.

First, we participated in the creation of the shelter land development code categories 15 years ago and felt then and now that the only thing different between Day Shelter and any other service facility is who is being served. If it is felt a service facility category for day services is needed, it should be inclusive of all day services providing meals, social, educational or health services and not single out only these services when offered to unhoused persons. We would have no concern with an Amendment #1 titled Daytime Service Agency with the same description for all populations. We understand Joel's concern that if there was not such a category, city government could restrict day shelters from being created. The compromise of creating a category called Day Service Agencies would address this concern along with ours.

Second, Amendment #1 A. 1 and Amendment #5 H. 6 add a requirement that both day and overnight shelters create a grounds plan and schedule outlining routine maintenance to insure compliance with Metro's code of ordinances. It is my understanding that all properties in Metro Louisville must comply with Metro's code of ordinance so we feel that either ALL property types should have this requirement or NONE and homeless shelters should not be singled out.

4) In the new Amendment #1 Day Shelter B. it says no day shelter shall be located within 1000' of the nearest property line of another day shelter. This is already not the case particularly in the case of ReCenter, Salvation Army, Chancery, Franciscan House and other facilities all located in close proximity. I believe that Joel felt this could be addressed by grandfathering in existing facilities.

5) We have interviewed several agencies that have created temporary shelter about their learnings and issues and would love to work with you to create a handbook to help other agencies doing this work in the future.



Natalie Harris

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Re-Center Ministries

Wave 3 News

Hope Village

Safe Space

Community Care Campus



(3 Pink Dots)
Our historical properties currently under renovation

(Blue Type)
Shelters within 1,000' of me

(Green Type)
Empty Lots + Green Space

Salvation Army

502 BluePrint

Meyzeek Middle School

JACKSON-SMOKETOWN



Comments on Proposed Shelter Code Changes

After reviewing the proposed changes to homeless shelters codes proposal, I request more accountability for:

1. The word (**STAFFED**) *What is the ratio? Is this 24/7?*
2. A shelter shall not be located within **1,000'** of another shelter that serves the **SAME POPULATION**. *Looking at the map attached, you will see there are several shelters within a 1,000' of my property. Define same population.*
3. The shelter shall meet the health, sanitation, structural, **PROPERTY MAINTENANCE**, fire, and life safety requirements of any currently applicable federal, state, and/or local laws. *Shelters need specific guidelines such as no loitering outside the shelter grounds. There must be courtyards, backyards or sideyards for smoking and hanging out.*

If there is no conditional use permit, does that mean that shelters can be created in residential neighborhoods without neighborhood approval?

Requested Codes for Shelters/Soup Kitchens

The most important codes that are **MISSING** from this proposal are the **CODES FOR SOUP KITCHENS**.

A Soup Kitchen is **NOT** currently regulated by the Land Development Code or Health Department Codes. This must change to attain healthy and safe neighborhoods for all.

Make clear that soup kitchens are shelters too and must follow the shelter codes and regulations.

A. NO FOOD TO GO. Shelters must be required to feed their guests inside their property at all times. No eating on the sidewalk. Allowing soup kitchens/shelters to serve “food to go” in open styrofoam containers with plastic utensils, individually wrapped food items, condiment packages and large open cups is turning Smoketown into a garbage dump. Guests of the soup kitchens/shelters take their “to go” meals to the empty lots and green spaces in the neighborhood and leave the “to go” meal trash in the green space or sidewalk. There are many empty lots in Smoketown with zero resources to clean up the trash. (pictures attached).

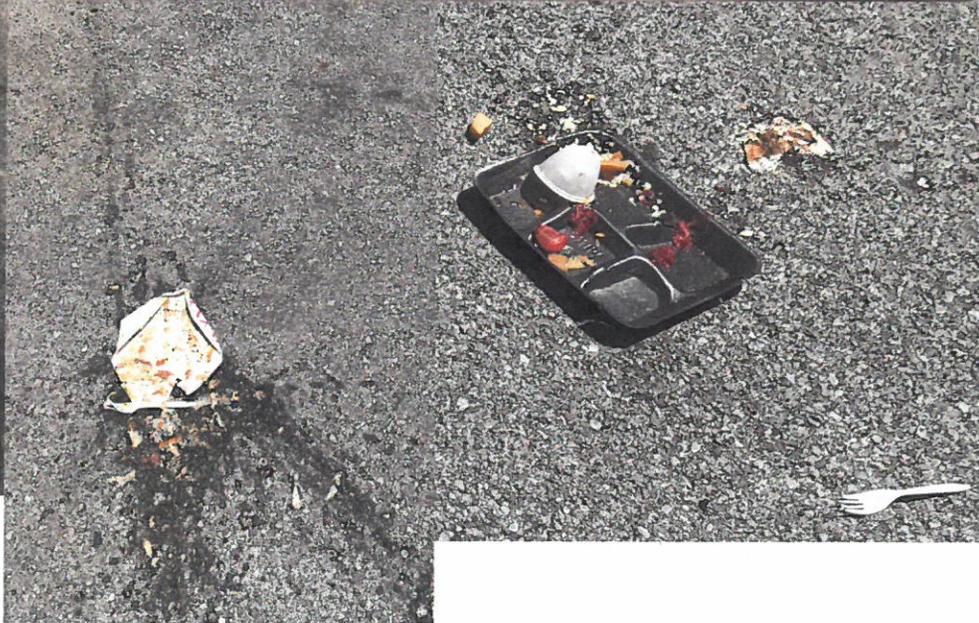
B. OUTSIDE SECURITY STAFF REQUIRED. Soup kitchens/day shelters must have someone outside managing their guests during operating hours. Queuing the line, repelling drug dealers, fights and public nuisances.

C. NO LOITERING OUTSIDE OF OPERATING HOURS. Frequent guests of the soup kitchens/day shelters know that the building is vacant when not serving food. When not serving food, the building is a gathering spot for drugs, camping and selling stolen items.

D. POLICE SURVEILLANCE CAMERAS OUTSIDE.
Proven Crime Deterrent.

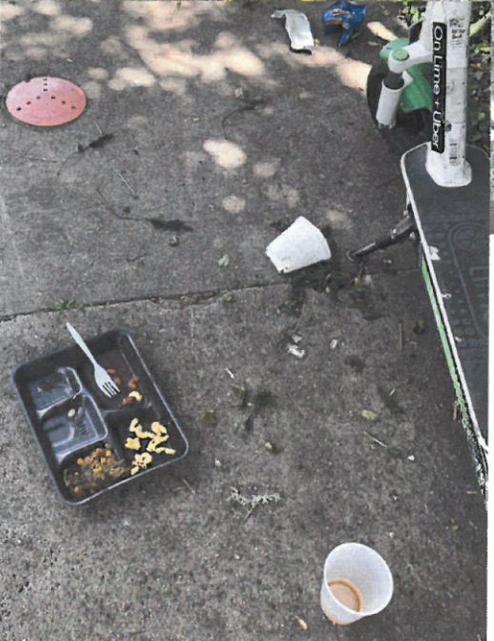
Open Food

A. NO FOOD TO GO.

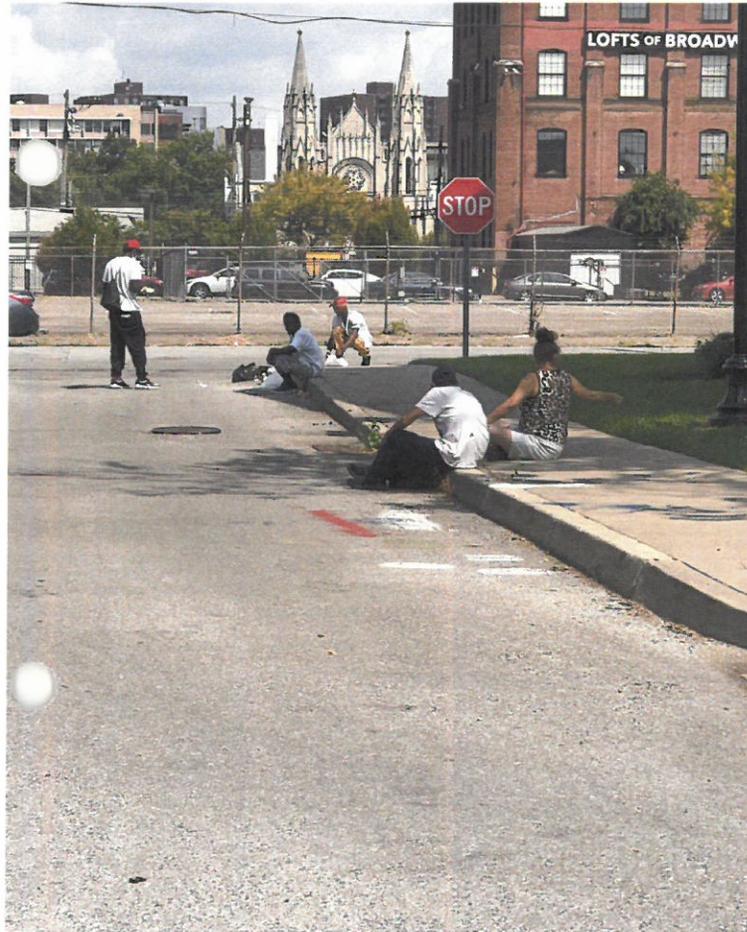


A. NO FOOD TO GO.

Open Food



Eating on the Dirty Sidewalk

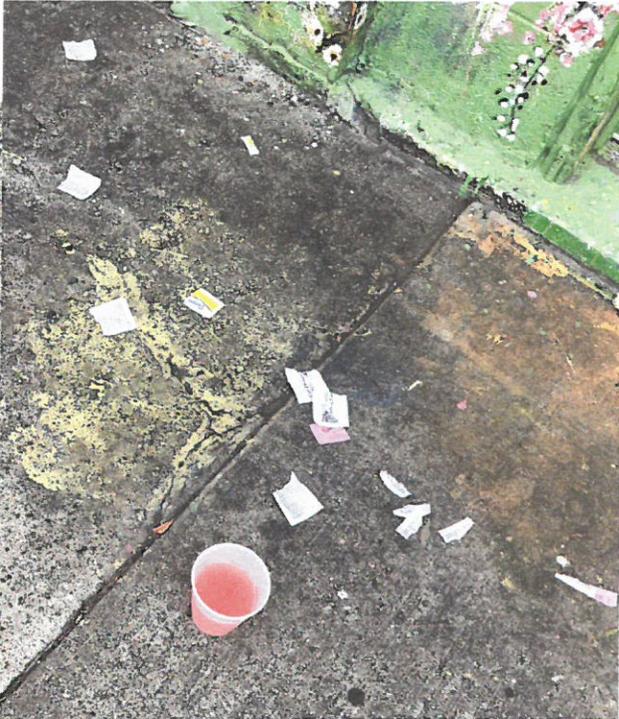


A. NO FOOD TO GO.

Styrofoam Trash



Condiment Packages



Plastic Cups & Flatware



Trash & Food in Green Space

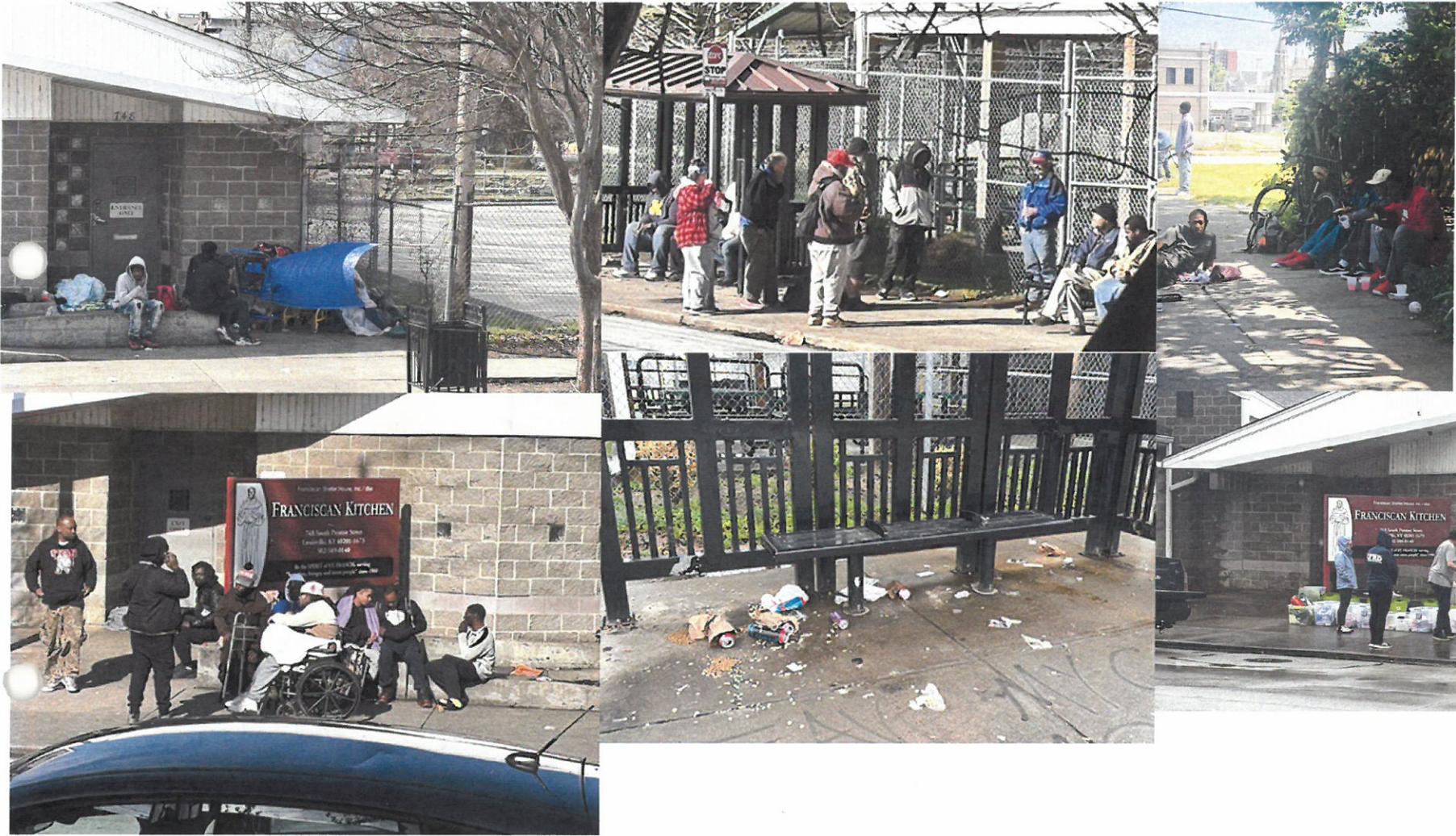
A. NO FOOD TO GO.



Maggots & Rats



B. OUTSIDE SECURITY STAFF REQUIRED.

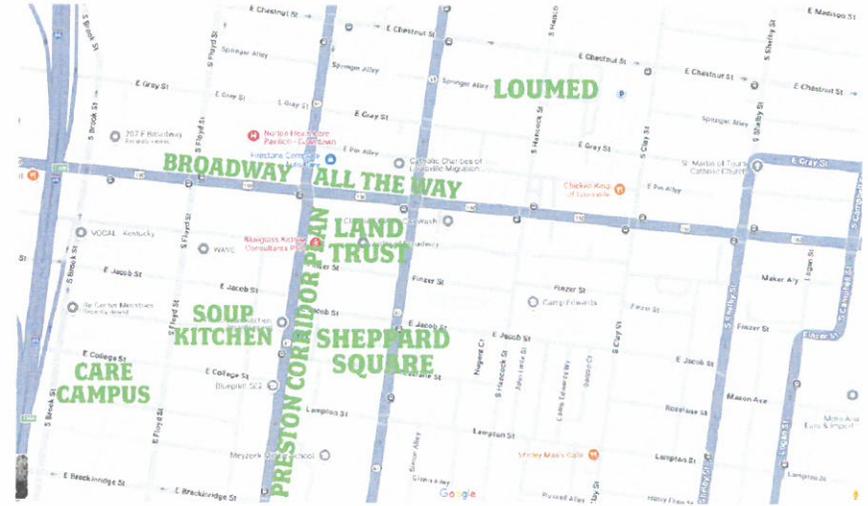


Questions

Are you sure a soup kitchen does not fall under the shelter codes?
It's a day shelter. What are the current shelter codes? What are the codes that the Franciscan Kitchen Shelter House follow?

Which codes do soup kitchens follow? How are they registered?
3 years of contacting the health department, they have told us that soup kitchens don't have codes and regulations to abide by.
How is this possible?

Who is coordinating all the shelters in this area?



Talking Points

Metro/Fed Investment:
\$40 Million on the Care Campus
\$10 Million for LouMed
\$2 Million for Preston Highway Corridor
\$100 Million for Broadway All the Way
\$2.1 Million for the Landtrust
\$100 Million for Sheppard Square

Reduce the city's solid waste spending by creating codes that erase food to go and individual packages of hygiene products. Smoketown deserves a clean and safe neighborhood. Impose codes and regulations for shelters and soup kitchens that create responsible neighbors. Add city trash cans, public toilets and increase cleaning resources in this area.

1. Codes & Regulations for Shelters (including Soup Kitchens).

Stop the "food to go". Require supervision and intervention.
No more loitering and jay walking.

2. Make a Drug Free Zone.

Prevention and deterrence. Addicts attract drug dealers.
Drug dealers attract crime.

3. Smoketown STILL does not have a grocery store.

It's time to consolidate the shelters and renovate one into the community grocery store.

4. Preston Street is not safe for pedestrians.

This is a high visibility location with heavy, fast traffic.
The TARC stop is continually overtaken with loiterers.



Dock, Joel

From: Natalie Harris <nharris@louhomeless.org>
Sent: Tuesday, April 8, 2025 4:19 PM
To: Dock, Joel
Subject: Here is my quick attempt at the federal programs that are allocated through Office of Social Services

Follow Up Flag: Follow up
Flag Status: Flagged

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The [Emergency Solutions Grant \(ESG\) program](#) is a federal program designed to help individuals and families who are experiencing or at risk of homelessness regain stability in permanent housing by funding activities like street outreach, emergency shelter operations, homelessness prevention, rapid re-housing, and Homeless Management Information System (HMIS).
\$826,200 for Metro Louisville in 2024-25

The [Community Development Block Grant \(CDBG\)](#) program is a federal grant program funded by the U.S. Department of Housing and Urban Development (HUD) that provides funding to states, cities, and counties to develop viable urban communities, focusing on decent housing, suitable living environments, and expanded economic opportunities, particularly for low- and moderate-income people.
\$1,373,000 allocated through OSS in Metro Louisville for homeless services in 2024-25

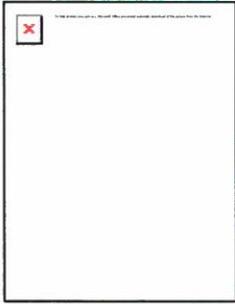
The [Housing Opportunities for Persons with AIDS \(HOPWA\)](#) program, authorized by the [AIDS Housing Opportunity Act](#), provides stable and permanent housing assistance and supportive services to low-income individuals living with HIV/AIDS.
\$1,566,700 to Metro Louisville in 2024-25

General Funds, authorized by Metro Council through Mayor's budget as Homeless Initiative Funds and Emergency Assistance Funds to homeless service agencies to address street homelessness and other homeless services including shelter and outreach
\$1,200,000 and \$750,000 in 2024-25

This is allocated through coordination of the Coalition for the Homeless and does not go through the city:

The [Continuum of Care \(CoC\)](#) program, a key component of the [U.S. Department of Housing and Urban Development \(HUD\)](#)'s efforts to combat homelessness, is a regional or local planning body that coordinates housing and services funding for homeless families and individuals, aiming to end homelessness through a community-wide commitment. \$23,000,000 in 2024

Let me know if this is not what you are looking for



Natalie Harris

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Dock, Joel

From: Curtis Stauffer <cstauffer@kyhousing.org>
Sent: Tuesday, April 8, 2025 1:52 PM
To: Dock, Joel
Subject: Covington 2020 Homeless Shelter Ordinance.pdf
Attachments: Covington 2020 Homeless Shelter Ordinance.pdf; Covington Shelter Ordinance as of 2025-4-7.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Joel-

Attached is the original 2020 Covington shelter ordinance. I believe it was modified in 2024 and have also attached the current regs downloaded from https://codelibrary.amlegal.com/codes/covington/latest/covington_ky/0-0-0-24927.

Here's what I could find for Boone County regs (not much) <https://online.encodeplus.com/regs/boonecounty-ky-rewrite/doc-viewer.aspx?secid=1506#secid-1506>. Individual cities may have their own regs.

**ARTICLE 31 SUPPLEMENTAL PERFORMANCE STANDARDS
SECTION 3116 REGULATIONS FOR EMERGENCY SHELTERS**

1. A.

Emergency Shelters shall meet the following requirements:

1. 1.

If located in an Agricultural or Residential district, the facility shall be operated within an existing building having a minimum floor area of 5,000 square feet.

2. 2.

The facility must be operated by a non-profit organization, a sponsoring agency, or government agency.

3. 3.

The facility must provide continuous on-site staffing during the hours of operation.

4. 4.

It shall be the responsibility of the shelter operator to notify the appropriate legislative unit(s) that a shelter is/will be in operation.

Couldn't find anything for Campbell County or Kenton County, but individual cities may have regulations

CHAPTER 124: HOMELESS SHELTERS AND TRANSITIONAL LIVING

Section

General Provisions

124.01 Definitions

Homeless Shelters and Boarding and Lodging Houses

- 124.10 Annual license required; posting of license
- 124.11 Annual application for license; investigation; fee
- 124.12 Compliance with federal, state and local laws and regulations
- 124.13 Duties of operator
- 124.14 Right of entry to inspect
- 124.15 Transfer of license
- 124.16 Denial of application for a new license
- 124.17 Revocation, suspension or denial of the transfer of a license
- 124.18 Enforcement
- 124.19 Implementation schedule

Recovery Residences

- 124.30 Annual recovery residence license required; posting of license
- 124.31 Application for license
- 124.32 License fee
- 124.33 Inspection required
- 124.34 Compliance with federal, state and local laws and regulations
- 124.35 Right of entry to inspect
- 124.36 Administration; enforcement

124.99 Penalty

GENERAL PROVISIONS

§ 124.01 DEFINITIONS.

For the purpose of this chapter, the following definitions shall apply unless the context clearly indicates or requires a different meaning.

ADDRESS. The physical location/address of a person or entity. It may not be a P.O. Box address.

BOARDING AND LODGING HOUSE. A dwelling unit where for compensation and by prearrangement rooms are provided for no more than eight people, meals may or may not be provided, but there exists one common kitchen facility. This term does not apply to hotel, motel, extended stay lodging facilities, short-term rental facilities, recovery residences, nursing home rooms or assisted living units.

CAMPUS. Shelters located on contiguous lots that are operated by the same operator.

CODE ENFORCEMENT OFFICER. Any employee of the city working under the direction of the Neighborhood Services Director and charged with the enforcement of the city's Nuisance Code, exclusive of clerical and administrative staff, as well as police and fire safety officers.

COUNSELING CENTER. A resource in the shelter that may direct residents to service providers that assist with alcohol and substance abuse treatment services, mental health services, health care, legal services and alternative living arrangement services in the local community. This center in the shelter may provide help with job placement and educational opportunities.

CRIMINAL RECORD CHECK. A criminal record check performed by the Kentucky Administrative Office of the Courts for records of criminal actions in the state.

DIRECTOR. Director of Neighborhood Services or other person designated by the City Manager.

HEALTH DEPARTMENT. The Northern Kentucky District Health Department.

HOMELESS or HOMELESS INDIVIDUAL OR PERSON. An individual who lacks a fixed, regular and adequate nighttime residence; and an individual who has a primary nighttime residence that is:

- (1) A supervised publicly or privately operated homeless shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters and transitional housing for the mentally ill);
- (2) An institution that provides a temporary residence for individuals intended to be institutionalized; or
- (3) A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

HOMELESS SHELTER. A facility the primary purpose of which is to provide temporary shelter for the homeless. The facility provides overnight sleeping accommodations with or without charge; may provide meals and ancillary social, educational or health services. The facility is staffed. No facility that is operated by the American Red Cross or other like entities to accommodate disaster victims who are left homeless due to events such as fires, flood or hazardous materials releases that is operated under the Kenton County Emergency Operations Plan is included.

KENTUCKY HOMELESS MANAGEMENT INFORMATION SYSTEM (KYHMIS). The data system for agencies providing services for the homeless and maintained by the Kentucky Housing Corporation.

MANAGEMENT PLAN. A plan to implement the operating requirements and hours of operation sections of this chapter that the shelter shall create.

MULTI-SERVICE SHELTER. A facility that provides meals, clothing and other such services for persons who are not residents of the homeless shelter, in addition to operating a homeless shelter.

OPERATOR. The person or group that runs the transitional housing or a homeless shelter or boarding and lodging house.

RESIDENT. A person properly registered or signed into a shelter for overnight occupancy that uses any or all of the services of a shelter.

RECOVERY RESIDENCE.

- (1) Any premises, place, or building that:
 - (a) Holds itself out as a recovery residence, recovery home, sober living residence, alcohol, illicit drug, and other intoxicating substance-free home for unrelated individuals, or any other similarly named or identified residence that promotes substance use disorder recovery through abstinence from intoxicating substances; and
 - (b) Provides a housing arrangement for a group of unrelated individuals who are recovering from substance use disorders or to a group of parents who are recovering from a substance use disorder and their children, including peer-to-peer supervision models; and
- (2) Does not include any premises, place, or building that is licensed or otherwise approved by the cabinet or any other agency of state government to operate as a residential or inpatient substance use treatment facility.

SHELTER. A homeless shelter or transitional housing or boarding and lodging house.

TRANSITIONAL HOUSING. A temporary residential living arrangement for persons participating in a program that provides supportive services (such as counseling, education, training and the like) to help persons achieve personal independence. Staff is available as needed. **TRANSITIONAL HOUSING** is not a rehabilitation home (as defined in the Land Development Code). These facilities are not subject to the Uniform Residential Landlord Tenant Act (KRS 383.500 et seq.).

(1984 Code, § 117.01) (Ord. O-05-20, passed 2-11-2020; Ord. O-21-24, passed 8-27-2024)

HOMELESS SHELTERS AND BOARDING AND LODGING HOUSES

§ 124.10 ANNUAL LICENSE REQUIRED; POSTING OF LICENSE.

(A) No person, firm or corporation shall own or operate a shelter on any premises within the city unless an annual license for the operation of a shelter has been applied for and issued by the Director for the premises and the license remains in effect in conformity with the provisions of this subchapter.

(B) Any license issued under this subchapter shall be valid from the date of issuance until the next occurring September 1, whether or not the next occurring September 1 is within the same calendar year as the grant of the license, unless the license has been suspended or revoked.

(C) Each owner or operator of a shelter licensed under this subchapter shall post the operator's license, in a conspicuous place at or near the entrance to such shelter so that it may be easily read at any time.

(D) Application for renewal of a license shall be made at least 90 days, but not before 210 days, before the expiration of the current license.

(E) If the renewal application and/or the annual fee are not tendered in a timely fashion, the Director shall serve notice to the operator that the failure to submit the renewal application and/or the annual fee within ten business days will be deemed an abandonment of the license as of the above-referenced renewal deadline. Service of the notice required by this section shall be deemed complete upon certified mailing, return receipt requested or personal delivery.

(F) The services of the multi-service shelter shall be subject to the requirements of this subchapter only for the programs and services related to the operation of the homeless shelter. Notwithstanding the foregoing, a multi-service shelter must comply with § 124.13(A)(18).

(1984 Code, § 117.02) (Ord. O-05-20, passed 2-11-2020; Ord. O-21-24, passed 8-27-2024)

§ 124.11 ANNUAL APPLICATION FOR LICENSE; INVESTIGATION; FEE.

(A) Each annual application to the Director for a license to operate a shelter shall be in writing, notarized and shall be in the form prescribed by the Director. The application, at a minimum, shall set forth:

- (1) The name, address and phone number of the applicant;
- (2) The organizational documents and by-laws of the organization showing its business address, email address and telephone number;
- (3) The names, addresses, email address and phone numbers of each member of the board of directors and key personnel responsible for the day-to-day operation of the facility if the applicant is a corporation;
- (4) The designation of a registered office and registered agent (who regularly works at the registered office) located in Kenton County, Kentucky which registered agent shall be its representative for the service of process or notice under this subchapter;
- (5) The location for which the permit is desired; a zoning permit and a certificate of occupancy listing the maximum allowable occupancy;
- (6) If the applicant is not the owner of record of the real property on which the shelter is located or to be located, the application shall include the name and address of the owner of record of the real property, and a copy of lease or other agreement authorizing use of the property by applicant;
- (7) A management plan describing:
 - (a) Staffing: number, training and qualifications;
 - (b) Participation in the Kentucky Homelessness Management Information System (KYHMIS) or such other HMIS as determined by order of the City Board of Commissioners upon recommendation of the City Manager; and
 - (c) Shelter policies required pursuant to § 124.13.
- (8) The notarized statement of the executive director that all owners, officers, directors and employees that have direct contact with a child at the shelter do not have a criminal record involving a felony violation of any crime against a minor, or an equivalent law of another jurisdiction within ten years next preceding the date of application, or any violation of this subchapter. Licensed shelters serving minors who are required to abide by KRS 17.165 may satisfy this standard by producing a current child caring or placing license;
- (9) Boarding and lodging house applications shall provide the following additional information:
 - (a) Resident/client profile (population to be served);
 - (b) Site plan and floor plans;
 - (c) Rules of conduct and business management plan;
 - (d) Support services to be provided and projected staffing level, if any; and
 - (e) Proposed maximum stay for each resident.
- (10) This licensure requirement shall apply in addition to licensure of boarding and lodging house licensed by the Commonwealth of Kentucky under KRS 216B.305 et seq.

(B) A nonrefundable fee of \$100 shall accompany the application for a shelter. A nonrefundable fee of \$150 shall accompany the application for a campus.

(C) (1) An annual application for a license must be made for each separate shelter or campus.

(2) When an application is received by the Director, the Director shall refer a copy of the application to the appropriate city agencies, which shall within ten business days of their receipt of the license application cause the facilities to be inspected to determine if the facilities meet the zoning, health, sanitation, structural, fire, property maintenance and fire safety requirements set out in any applicable state and local laws, and report such information to the Director within ten business days of such inspection.

(a) A food establishment inspection shall not be required at the time of application for a shelter license if the Northern Kentucky District Health Department conducted such an inspection at the shelter location within the six months prior to the

application, or if the shelter does not have cooking facilities.

(b) The Northern Kentucky District Health Department will advise the Director in writing as to whether a food establishment inspection is required for the shelter license application.

(D) A license to operate a shelter shall be issued to the applicant by the Director within ten business days after receipt of the inspection reports required by division (C) above, if the application is fully and accurately completed and if the required inspections reveal that the shelter meets the zoning, health, sanitation, structural, fire and safety requirements of any currently applicable federal, state and local laws as may be amended from time to time. However, no license shall be issued by the Director if any one of the following is found to be true:

(1) The applicant or any of its owners, officers, directors or employees that have direct contact with a child at the shelter has a felony violation of any crime against a minor, or an equivalent law of another jurisdiction within ten years next preceding the date of application, or any felony conviction for any crime involving physical abuse or sexual abuse, or any violation of this subchapter;

(2) An applicant is delinquent in the payment to the city of taxes, fees, fines or penalties assessed against or imposed upon the applicant in relation to a shelter;

(3) The license fee required by division (B) above has not been paid;

(4) The proposed shelter is located in a zoning district other than a district in which shelters are allowed to operate under the applicable zoning regulations of the city; or

(5) The applicant's premises have been found by the Director to not be in compliance with laws or regulations of any applicable federal, state or local governments.

(E) In the event of denial, the Director shall notify the applicant in writing of the reasons for such denial. Said notice shall be mailed, certified mail, return receipt requested, within ten business days after the Director receives the inspection reports required by division (C) above.

(F) In the event the inspection required by this section is not completed within the timeframe set forth in division (C) above or if the Director fails to notify the applicant in writing of the reasons for denial of the application in the manner prescribed in division (E) above, then the application will be deemed to be granted and the shelter authorized to operate until such time as all required inspections have been completed, the Director has received the required reports, and the applicant receives notice of the Director's decision on the application by certified mail, return receipt requested.

(1984 Code, § 117.03) (Ord. O-05-20, passed 2-11-2020; Ord. O-21-24, passed 8-27-2024)

§ 124.12 COMPLIANCE WITH FEDERAL, STATE AND LOCAL LAWS AND REGULATIONS.

Each separate shelter shall be in compliance with any currently applicable laws and regulations of the federal, state or local governments, as may be amended from time to time including, but not limited to:

(A) The International Property Maintenance Code (IPMC) 2015, National Fire Protection Association (NFPA) Life Safety Code, National Fire Protection Association (NFPA) 1 Fire Code;

(B) The city's Zoning Code;

(C) Occupancy limits established by the local building official and the city's Fire Department;

(D) The provisions of KRS 17.545 unless the shelter excludes registered sex offenders; and

(E) Laws or regulations on nondiscrimination, zoning, building, safety, occupancy limits, property maintenance, food sanitation, health and sanitation, fire, electrical, plumbing, mechanical, reporting the dependency, abuse or neglect of minor children and other applicable laws.

(1984 Code, § 117.04) (Ord. O-05-20, passed 2-11-2020)

§ 124.13 DUTIES OF OPERATOR.

(A) In addition to being in compliance with any currently applicable laws and regulations of the federal, state or local governments required by § 124.12, it shall be the duty of the operator of a shelter licensed under this subchapter to:

(1) Maintain the health and safety standards set out herein or in any currently applicable laws or regulations of the federal, state or local governments as may be amended from time to time;

(2) Have a criminal record check performed on all employees having direct contact with a child at the shelter prior to such employee's performing duties for the shelter, and annually thereafter;

(3) Have a criminal record check performed on all volunteers having direct contact with a child at the shelter within one week of the volunteer first volunteering for the shelter, and annually thereafter, or, if a licensed shelter serving minors, operator shall abide by state licensing requirements governing volunteers;

(4) Provide and have available for review, by any employee, volunteer or resident, educational materials regarding communicable diseases and precautions to be taken to protect the employee, volunteer and shelter residents;

- (5) Maintain a written and posted first aid and cardiopulmonary resuscitation ("CPR") policy, including having:
 - (a) At least one person trained and currently certified in first aid and CPR on duty on each shift;
 - (b) All certifications of employees or volunteers for first aid and CPR shall be kept on file for inspection by the Northern Kentucky District Health Department; and
 - (c) Adequate and available medical supplies for first aid and CPR.
- (6) Provide written policies and procedures on the handling of prescription or over-the-counter drugs, including controls and/or limitations on access to prescription and over-the-counter drugs kept in the shelter;
- (7) Maintain sanitary conditions in the shelter;
- (8) Maintain all mattresses and box springs with a water resistant encasing protective cover that will resist tearing and can be wiped thoroughly with a disinfectant cleaner before use by any other residents;
- (9) Post a clearly marked evacuation plan that is approved by the appropriate Fire Department or Fire District official in areas available to both shelter staff and residents, and keep a copy of the plan on file;
- (10) Provide services to all individuals within the city free from discrimination because of race, color, religion, national origin, familial status, age, disability, sex, gender identity or sexual orientation. Nothing contained herein shall be construed to prohibit any shelter from maintaining separate facilities for the different sexes or being a unisex facility;
- (11) Allow clients access to restrooms during shelter hours of operation;
- (12) If required, have and maintain a Kentucky food establishment permit and have received a passing score on their most recent inspection;
- (13) Boarding and lodging houses shall not have any signage which identifies the use;
- (14) Boarding and lodging houses shall be located on or near a collector or arterial street with reasonable access to public transportation;
- (15) Boarding and lodging houses shall provide sufficient on-site parking as required by the city's Zoning Code;
- (16) The new owner of a shelter, including a boarding and lodging house, must file the registration statement within ten days of a change of ownership and/or acquiring title to the shelter;
- (17) The operator shall participate in and provide complete and accurate information for residents to the Kentucky Homeless Management Information System (KYHMIS) or designated alternative on a quarterly basis. The operator shall grant the city complete access to all its data submitted to KYHMIS to the extent permitted by law;
- (18) The facility shall provide adequate waiting areas within the premises for clients and prospective clients to ensure that public sidewalks, streets and alleys are not used as queuing or waiting areas;
- (19) In the interest of infection control, the operator shall maintain an accurate and complete list of the names of all residents housed in the shelter;
- (20) The operator shall maintain sufficient insurance coverage to protect against liability and foreseeable loss, and shall include the city as a named insured for any liability that may accrue to the city as a result of the operation of the shelter;
- (21) The operator shall have on premises adequately trained staff as to deal with the potential behavioral issues that will arise from the resident population without excessive reliance on the city's public safety agencies;
- (22) The operator shall continuously monitor waiting areas to inform prospective residents whether they can be served in a reasonable time. If they cannot be served by the operator because of time or resource constraints or occupancy limits, the monitor shall inform the prospective resident of alternative programs and locations where he or she may seek similar service;
- (23) The operator shall provide for timely removal of litter attributable to clients within the vicinity of the facility every 24-hour period;
- (24) The service provider shall have a plan to minimize disruption or damage caused by clients' behavior on properties located within two blocks of the facility;
- (25) The operator shall maintain good communication and have procedures in place to respond to operational issues which may arise from the neighborhood, city staff or the general public;
- (26) The operator shall implement other conditions and/or measures as determined by the city in consultation with other city agencies, necessary to ensure the management and for residents of the establishment maintain the quiet enjoyment, safety and cleanliness of the shelter and the vicinity of use;
- (27) The operator shall establish standards for responding to emergencies and incidents involving the expelling of residents from the shelter. Re-admittance policies for residents who have previously been expelled from the shelter shall also be established;

(28) The operator shall establish re-admittance policies for residents whose behavior or conduct has required public safety agency intervention;

(29) Alcohol and illegal drug use is prohibited on site. Service providers shall expel residents from the facility if found to be using alcohol or illegal drugs while on site, unless good cause is shown;

(30) The facility shall be open 24 hours a day, seven days a week to provide, at a minimum, around the clock access to toilet and shower facilities for those eligible to be served by the facility;

(31) In order to encourage clients to pursue stable and permanent housing, the operator shall limit the maximum stay for residents to 150 days within a 365-day period, except for residents participating in a transitional housing program as described in the management plan submitted as part of the licensing process; or for good cause shown; and

(32) The operator shall not allow shopping carts or pets on the premises, except when the pets are registered as disability or emotional support pets.

(B) Notwithstanding the above requirements set forth in division (A) above, divisions (A)(17) through (A)(32) above shall not apply to boarding and lodging houses.

(1984 Code, § 117.05) (Ord. O-05-20, passed 2-11-2020; Ord. O-21-24, passed 8-27-2024)

§ 124.14 RIGHT OF ENTRY TO INSPECT.

Any peace officer, Code Enforcement Officer, Fire Department or Fire District official and any other appropriate investigating officials of the city, shall have the right to enter any portion of a shelter's premises during regular business hours where shelter residents and employees are permitted for the purpose of making reasonable inspections and determining compliance with zoning, health, sanitation, structural, electrical, plumbing, fire, property maintenance and safety regulations, as well as all other provisions of law or regulations.

(1984 Code, § 117.06) (Ord. O-05-20, passed 2-11-2020)

§ 124.15 TRANSFER OF LICENSE.

(A) No shelter license shall be transferable except with the written approval of the Director. The application for such a transfer shall be in writing and shall contain the same information required for the initial application for such a license.

(B) The application procedure shall be the same as outlined in §124.11. A \$100 transfer fee shall be charged for each such license transfer.

(C) In the event of denial, notification and reasons for denial shall be given to the applicant in the manner provided by § 124.11. A denial of a transfer may be appealed in the same manner as the denial of an application for an original shelter license.

(1984 Code, § 117.07) (Ord. O-05-20, passed 2-11-2020; Ord. O-21-24, passed 8-27-2024)

§ 124.16 DENIAL OF APPLICATION FOR A NEW LICENSE.

(A) In the event the Director denies an application for a new shelter, the Director shall advise the applicant of his or her decision, and the reasons therefore, by certified letter, return receipt requested, sent to the most current address listed in the affected operator's file. Such denial of an application for a new shelter license shall include information regarding the right to appeal the decision. The applicant affected by the denial of a new permit shall have ten business days from the date of receipt of said notice to appeal the Director's decision by notifying him or her in writing of the basis for said appeal. The notice of appeal may be hand delivered to the Director or sent certified mail, return receipt requested. Unless a timely notice of appeal is received, the decision of the Director shall be final. When the Director denies an application for a new shelter, the applicant shall not operate as a shelter until either the Code Enforcement Board or a court of competent jurisdiction so orders. Notwithstanding the preceding sentence, all homeless shelters and transitional housing facilities in existence and in operation on the effective date of this subchapter shall be issued an initial license for a term in accordance with § 124.10(B) of this subchapter.

(B) When the Director receives a notice of an appeal, he or she shall schedule a time and date for the appeal to be heard before the Code Enforcement Board and such hearing shall be held within 30 calendar days of the date the Director receives the notice of appeal. The Director shall notify the appellant in writing of the hearing date and may send such notice by regular first class mail. The appellant may request an alternate hearing date but in no event shall it be more than 30 days after the originally scheduled date.

(C) At the hearing on the new license denial, the appellant shall have the right to counsel, present evidence and offer testimony by witnesses. The hearing shall be transcribed. The Board shall render written findings within 20 days of its oral decision. The Board's decision will be final unless appealed.

(D) Any party adversely affected by the Code Enforcement Board's decision may appeal it to the Kenton Circuit Court within 30 days of the date the Board issues its written findings. The party appealing the Board's decision will be responsible for the cost of preparing the transcript which, along with evidence presented and the written findings of the Board, shall constitute the record on appeal. The decision of the Board shall be effective during the pendency of the appeal unless stayed by a court of competent jurisdiction.

(1984 Code, § 117.08) (Ord. O-05-20, passed 2-11-2020; Ord. O-21-24, passed 8-27-2024)

§ 124.17 REVOCATION, SUSPENSION OR DENIAL OF THE TRANSFER OF A LICENSE.

(A) In the event the Director has reason to believe that a shelter is operating in violation of this subchapter, or that the transfer of a license would create a violation of this subchapter, the Director shall provide written notice to the operator that the shelter license is suspended, revoked or denied a transfer. The written notice shall include the reasons for the revocation, suspension or denial of a transfer, and shall be sent by certified letter, return receipt requested, to the most current address listed in the affected operator's file. Such notice shall include information regarding the right to appeal the decision. Any decision by the Director to suspend, revoke or deny the transfer of any license issued hereunder shall remain in abeyance until all appeals are exhausted or the time for filing the initial appeal from the Director's decision under division (B) below has expired.

(B) Upon receipt of a decision from the Director to suspend, revoke or deny the transfer of a license, the operator affected thereby shall have ten business days from the date of receipt of said notice to appeal the Director's decision by notifying the Director in writing of the basis for said appeal. The notice of appeal may be hand delivered to the Director or sent certified mail, return receipt requested. Unless a timely notice of appeal is received, the decision of the Director shall be final.

(C) When the Director receives a notice of an appeal, the Director shall schedule a time and date for the appeal to be heard before the Code Enforcement Board and such hearing shall be held within 30 calendar days of the date the Director receives the notice of appeal. The Director shall notify the appellant in writing of the hearing date and may send such notice by regular first class mail. The appellant may request an alternate hearing date but in no event shall it be more than 30 days after the originally scheduled date.

(D) At the hearing on any license suspension, revocation or denial of license transfer, the operator shall have the right to counsel, present evidence and offer testimony by witnesses. The hearing shall be transcribed. The Board shall render written findings within 20 days of its oral decision. The Board's decision will be final unless appealed.

(E) Any party adversely affected by the Code Enforcement Board's decision may appeal it to the Kenton Circuit Court within 30 days of the date the Board issues its written findings. The party appealing the Board's decision will be responsible for the cost of preparing the transcript which, along with evidence presented and the written findings of the Board, shall constitute the record on appeal. The decision of the Board shall be effective during the pendency of the appeal unless stayed by a court of competent jurisdiction.

(1984 Code, § 117.09) (Ord. O-05-20, passed 2-11-2020)

§ 124.18 ENFORCEMENT.

(A) In addition to the penalties provided in §124.99 of this chapter, the Director is authorized to enforce the provisions of this subchapter through declaratory, injunctive and other civil actions filed in any court of competent jurisdiction.

(B) The Director has the authority to issue rules and regulations for the implementation of this subchapter. Written notice of the issuance of any rules and/or regulations concerning the implementation of this subchapter shall be sent by first class mail to all license holders ten days prior to the date they become effective. The rules and regulations shall be available to the public online through the city website.

(1984 Code, § 117.10) (Ord. O-05-20, passed 2-11-2020)

§ 124.19 IMPLEMENTATION SCHEDULE.

(A) Elements of this subchapter requiring an existing shelter to invest \$50,000 or more in capital funds to become compliant shall be effective two years from the date of passage and publication of the chapter. Shelters desiring such a delay shall submit a petition to the Director within 90 days after adoption of this subchapter.

(B) The operators of existing facilities shall apply for the permit and submit the required documentation within six months after the date of passage and publication of this subchapter.

(C) All shelters occupied for the first time after January 1, 2020 shall comply fully with the requirements of the subchapter without delay.

(1984 Code, § 117.11) (Ord. O-05-20, passed 2-11-2020)

RECOVERY RESIDENCES

§ 124.30 ANNUAL RECOVERY RESIDENCE LICENSE REQUIRED; POSTING OF LICENSE.

(A) No person shall own or operate a recovery residence unless the owner or operator has first obtained a recovery residence license. A separate license is required for each recovery residence owned

or operated by an individual or entity. The issued license shall be posted in a readily visible place in the recovery residence.

(B) The license is renewable annually and shall expire on the last day of the month one year after the date of issuance.

(C) The license is non-transferable, may not be assigned to another person or entity, and is void upon transfer of the property.

(Ord. O-21-24, passed 8-27-2024)

§ 124.31 APPLICATION FOR LICENSE.

(A) The owner or operator of each recovery residence shall submit a written application for a recovery residence license to the Director or a designee on a form provided by the city. The city may provide an electronic application in lieu of or in addition to a written application. The application shall, at minimum, set forth:

- (1) The name, address, email address and phone number of the applicant;
- (2) The name, address, email address and phone number of a designated point of contact, if different from the applicant;
- (3) The address of the recovery residence to be licensed;
- (4) The number of bedrooms in the recovery residence and maximum occupancy;
- (5) Proof of certification or provisional approval by a certifying organization recognized by Kentucky, or proof that a certification process has been initiated with a certifying organization;
- (6) A sworn statement of compliance with KRS 222.500 through 222.510;
- (7) Proof of a zoning permit or approval for the property to be used as a recovery residence; and
- (8) Proof of valid business and occupational licenses with the city.

(B) If the license application is incomplete, the Director or a designee shall return the application with written instructions regarding proper completion and resubmission of the application.

(Ord. O-21-24, passed 8-27-2024)

§ 124.32 LICENSE FEE.

The fee for issuance or renewal of each recovery residence rental license shall be \$100 and shall be submitted with the license application.

(Ord. O-21-24, passed 8-27-2024)

§ 124.33 INSPECTION REQUIRED.

(A) Following receipt of a complete application, a city code inspector shall inspect the property prior to the issuance of the license and the recovery residence must pass inspection to obtain the license.

(B) If the inspection finds violation of any of the codes, the code inspector shall provide written notice to the applicant and the license application shall not be further considered until the code violations are corrected and the unit successfully reinspected. If the violations are not corrected within 20 days after notice of violation, the application shall be denied unless the deadline is further extended by the code inspector.

(C) A reinspection fee of \$75 shall be charged for each reinspection required because the recovery residence failed to meet the standards set forth in this subchapter or the applicant failed to appear for a scheduled inspection.

(Ord. O-21-24, passed 8-27-2024)

§ 124.34 COMPLIANCE WITH FEDERAL, STATE AND LOCAL LAWS AND REGULATIONS.

Each recovery residence shall be in compliance with any currently applicable laws and regulations of the federal, state or local governments, as may be amended from time to time including, but not limited to:

(A) The International Property Maintenance Code (IPMC) 2015, National Fire Protection Association (NFPA) Life Safety Code, National Fire Protection Association (NFPA) 1 Fire Code;

(B) The city's Zoning Code;

(C) Occupancy limits established by the local building official and the city's Fire Department; and

(D) The provisions of KRS 17.545 unless the recovery residence excludes registered sex offenders.

(Ord. O-21-24, passed 8-27-2024)

§ 124.35 RIGHT OF ENTRY TO INSPECT.

Any peace officer, Code Enforcement Officer, Fire Department or Fire District official and any other appropriate investigating officials of the city, shall have the right to enter any portion of a recovery residence's premises during regular business hours where residents and employees are permitted for the purpose of making reasonable inspections and determining compliance with zoning, health, sanitation, structural, electrical, plumbing, fire, property maintenance and safety regulations, as well as all other provisions of law or regulations.

(Ord. O-21-24, passed 8-27-2024)

§ 124.36 ADMINISTRATION; ENFORCEMENT.

(A) The provisions of this subchapter shall be administered and enforced by the Director or a designee.

(B) The Director or a designee shall cooperate with, share and receive information required to be provided to the city by the Commonwealth of Kentucky, Cabinet for Health and Family Services, Kentucky Recovery Housing Network or other government agency.

(C) Violations of the provisions of this subchapter shall be enforced by the Director or a designee in accordance with the code enforcement proceeding set forth in Ch. 92 of this code of ordinances and the penalties set forth in § 124.99.

(D) In addition to the penalties provided in §124.99, the Director is authorized to enforce the provisions of this subchapter through appropriate legal action to compel a recovery residence that is operating in violation of this subchapter and/or KRS 222.500 through 222.510, as may be amended, to cease operating.

(Ord. O-21-24, passed 8-27-2024)

§ 124.99 PENALTY.

(A) (1) Any person who operates a shelter without a license as provided in §§124.10 through 124.19 shall be issued a citation by an enforcement officer designated by the Director, and ordered to cease operations until a valid license is obtained. Operating a shelter without a license shall constitute a civil offense and any person, firm or corporation who operates a shelter without a license shall be subject to a civil fine of not less than \$500, nor more than \$1,000, per day for each day that a shelter is operated without a valid license. Citations and enforcement proceedings shall be pursued in accordance with Ch. 92 of this code of ordinances. Each day of such violation(s) shall constitute a separate offense.

(2) Operating a licensed shelter in a manner that violates the provisions of §§124.10 through 124.19 shall constitute a civil offense and any person, firm or corporation who operates a licensed shelter in a manner that violates the provisions of §§ 124.10 through 124.19 shall be subject to a civil fine of not less than \$100, nor more than \$1,000, per day for each day that a licensed shelter is operated in a manner that violates this code. Citations and enforcement proceedings shall be pursued in accordance with Ch. 92 of this code of ordinances. Each day of such violation(s) shall constitute a separate offense.

(3) Any person who owns or operates a recovery residence in a manner that violates the provisions of §§24.30 through 124.36 shall be subject to a maximum civil fine of \$1,000 for each violation. If the person who has committed the violation does not contest the citation, a civil fine of \$500 for each violation shall be imposed. If the owner or operator of the recovery residence has been found guilty of violating the provisions of §§ 124.30 through 124.36 with respect to the same recovery residence at issue, within the five years preceding the date on which the citation is issued, the owner or operator shall be subject to having its license for that particular recovery residence suspended for a period of time up to one year, or revoked for a period of time up to five years.

(B) A person found to have committed a violation of this code shall be personally responsible for the amount of the civil fines assessed for the violation and for all charges, fees and abatement costs incurred by the city in connection with the enforcement. The city may bring a civil action against the person and shall have the same remedies as provided for the recovery of a debt.

(1984 Code, § 117.99) (Ord. O-05-20, passed 2-11-2020; Ord. O-27-20, passed 12-15-2020; Ord. O-11-23, passed 6-28-2023; Ord. O-21-24, passed 8-27-2024)

Dock, Joel

From: Wufoo <no-reply@wufoo.com>
Sent: Tuesday, April 8, 2025 9:14 AM
To: Dock, Joel
Subject: Comment on Land Development Code changes [#5]

Name Sarah Buckler

*

Zip 40206

Code

*

Email scheibers02@yahoo.com

*

Comment *

I urge you not to change the zoning or development codes for day shelters for people experiencing homelessness. These spaces are no different than any other business or nonprofit offering services to the general public, such as a Neighborhood Place, food bank or area community ministry. Specifically singling out services for homeless individuals with different zoning and development codes seems onerous and discriminatory to me, as this population is part of our community deserving services just as much as anyone else. If the concerns are around cleanliness, I would urge you to have similar strong zoning and development rules around every bar on Saturday nights/Sunday mornings, outside of every sports arena and Churchill Downs around major events, and around any high-traffic area.

Overall I strongly support the desire to increase access and options for shelter development in our community, and I thank you for your work to ensure the needs of all community members are being met.

From: [Wufoo](#)
To: [Dock, Joel](#)
Subject: Comment on Land Development Code changes [#4]
Date: Wednesday, April 2, 2025 10:11:42 PM

Name * ann ramser
Zip Code * 40214
Email * gealr@iglou.com

Comment *

I always have concerns with the Office of Planning staff making decisions when the decision drastically affects neighborhoods. When the Office of Planning staff makes decisions regarding homeless and crisis shelters, that means the neighborhood residents most affected have no input. These people are, in effect, silenced.

The Office of Planning Staff frequently recommends to the BOZA ways to circumvent existing standards such as the 600-foot rule for short term rentals, 1,000 feet for group homes, and 30 foot rule for group home. The recommendations to circumvent existing standards even when areas of town, such as District 5, have much more than their fair share of group homes.

If the Office of Planning Staff tells the BOZA how to circumvent standards, I question what the Office of Planning Staff will do when making decisions about cases of which the public has less information. The Office of Planning Staff makes decisions regarding accessory dwelling units. Those applications do not appear on the IARC report thus the public is not on notice of the applications.

I am not as concerned with the Office of Planning staff making decisions regarding the extreme weather shelter. The shelters will be open for short periods of time and will not drastically affect nearby residents on a continuing basis.

Section A(3) of the Day Shelter amendment; Section A(3) of the Accessory Overnight Shelter; and Section G(c) of the Update Existing Homeless Shelter – Permitted with Special Standards contains the following language

"Rules of Conduct, including the use of common spaces (indoor/outdoor) and expectations to maintain the health and safety of the populations served, as well as the users of adjoining properties. "

Section C of the Day Shelter; Section G of the Accessory Overnight Shelter; and Section C of the Update Existing Homeless Shelter– Permitted with Special Standards indicates that the shelters must meet the health, sanitation, structural, property maintenance, fire, and life safety requirements of any currently applicable federal, state, and local laws.

The clause "as well as the users of adjoining properties" under rules of conduct is unclear. Shelters are basically businesses with customers/clients. I am unaware of businesses being responsible for users of adjoining properties beyond the business meeting the requirements of federal, state, and local laws. The last clause under Rules of conduct needs to be removed or rewritten.

Section B of the Day Shelter should be 1,000 feet of another Day Shelter, Accessory Overnight Shelter, Homeless Shelter, or a group home.

Section B of the Accessory Overnight Shelter should be 1,000 of another Accessory Overnight Shelter, Day Shelter, any Homeless Shelter or a group home.

Section D of the Accessory Overnight Shelter indicates the maximum occupancy shall not exceed 25 individuals, not including dependent children under the age of 18. This seems excessive especially when minors are not counted towards the maximum occupancy. The definition for Accessory Overnight Shelter indicates the shelter is staffed but does not indicate staff to client ratio. If each of the 25 brings in just one dependent child, the shelter will have 50 occupants plus staff. How was 25 determined to be the maximum occupancy rate. Are children over the age of 18 but dependent on their parent(s) due to physical or mental issues included in the 25 individuals. I believe that a staff to client ratio within the confines of current occupancy limitations in LMCO is more appropriate than using what appears to be an arbitrary number of 25.

Section F of the Accessory Overnight Shelter shall only apply if the same group operating the shelter continues to operate the shelter after the religious activity ceases operation. If group A operates the shelter until the religious activity ceases operation and then group B that never had any connection to the former religious activity starts operating the shelter immediately after the religious activity ceases, then group B needs to follow the Homeless Shelter regulations.

Why isn't the second sentence in Section D under Extreme Weather Shelter (Prior to occupancy. . .) included in Day Shelter; Accessory Overnight Shelter; Existing Homeless Shelter (conditional use permit or permitted with special standards).

Amendment #3 seems very broad. The amendment appears to eliminate all CUPs regarding Private Institutional uses, not just CUPs related to shelters. This is not appropriate. Would the Office of Planning staff be approving a Private Institution's proposal for a new baseball field, tennis court, pickle ball court, school playground etc. right next to a residential neighborhood.

Section C of Amendment #5 should be changed to prevent a Homeless Shelter from being within 1000 feet of another Homeless Shelter, Accessory Overnight Shelter, day shelter, or group home consisting of a rehabilitation home, transitional home, or boarding house. Similar language needs to be added to Amendment #6.

Why is language similar to Section I in Amendment #6 not included in Amendments 2 and 5.

Dock, Joel

From: Dock, Joel
Sent: Monday, March 31, 2025 12:55 PM
To: 747 smoketown
Subject: RE: Proposed changes to homeless shelters
Attachments: Ord. 19, series 2024.pdf

Aimee,

Thanks for the detailed email. I'd be happy to discuss your comments related to Shelters and any concerns related to Soup Kitchens. Although, I should note that regulating soup kitchens, at this time, is outside the scope of the current request by the Louisville Metro Council, see attached resolution. That doesn't mean we can't discuss those concerns and see if there are any solutions.

Is there a time/day next week that works for you to discuss the proposal? We can meet by phone, virtually, or in-person.

Thanks,

Joel P. Dock, AICP
Planning Manager

Office of Planning
Louisville Metro Government
444 S. Fifth St. #300, Louisville, KY 40202
502-574-5860



OFFICE OF
PLANNING

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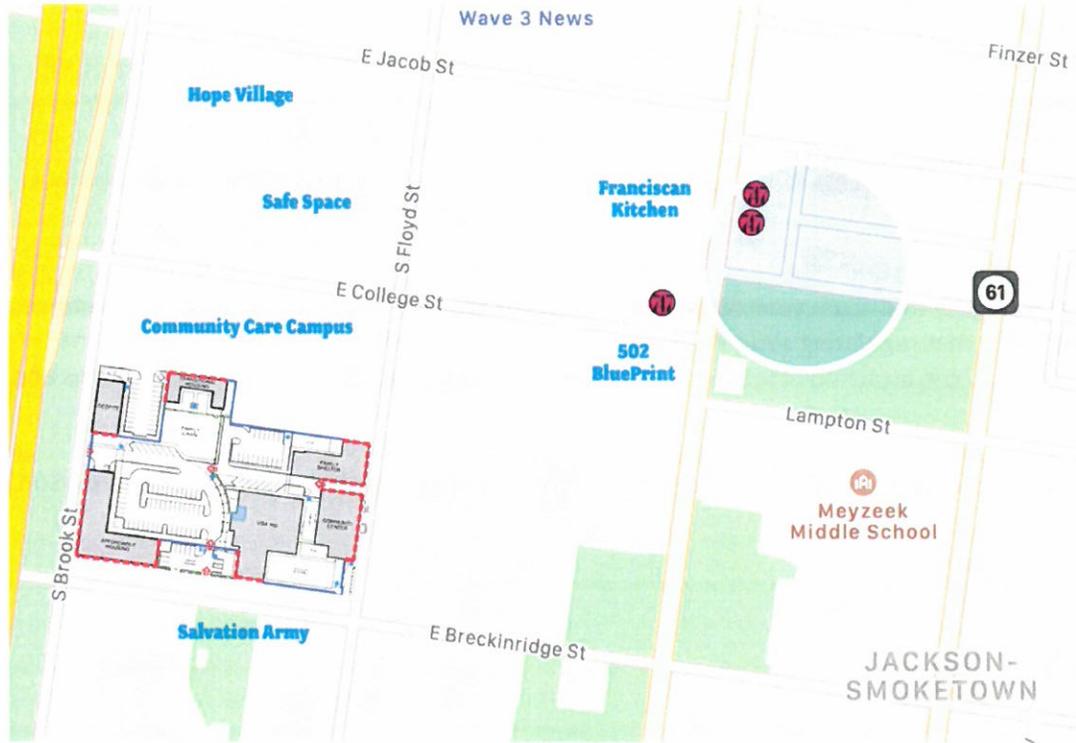
Learn more about Land Development Code Reform here: <https://louisvilleky.gov/ldcreform>

From: 747 smoketown <747smoketown@gmail.com>
Sent: Sunday, March 30, 2025 4:43 PM
To: Dock, Joel <Joel.Dock@louisvilleky.gov>
Subject: Proposed changes to homeless shelters

CAUTION: This email came from outside of Louisville Metro. Do not click links, open attachments, or give away private information unless you recognize the sender's email address and know the content is safe.

Good Morning Joel Dock,

Thank you for emailing the proposed changes to homeless shelters. The city homeless shelter codes are vitally important to the health and safety of my family, friends and neighbors. I have attached a map that shows my properties currently under renovation in Smoketown (3 Pink Dots) as well as the homeless shelters next to me (Blue Type).



The most important codes that are **MISSING** from this proposal are the **CODES FOR SOUP KITCHENS**. A Soup Kitchen is not currently regulated by the Land Development Code or Health Department Codes.



Requested Codes for Soup Kitchens:

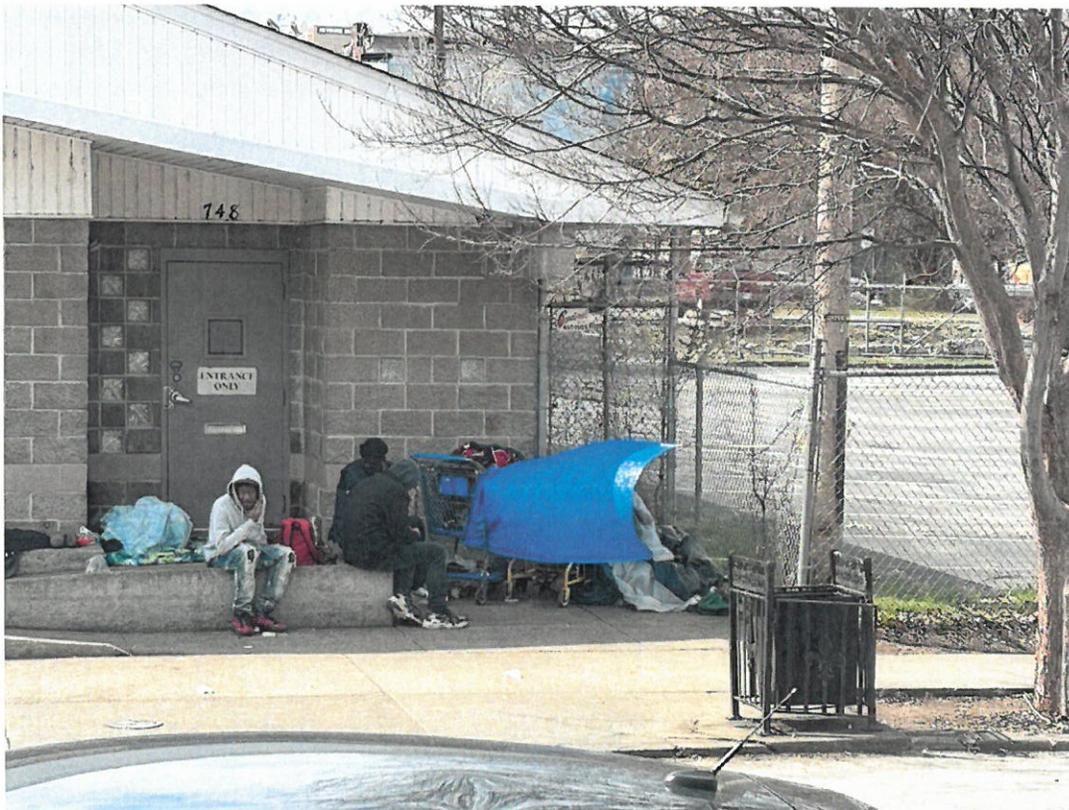
A. NO FOOD TO GO. Soup Kitchens must be required to feed their guests inside their property at all times. Allowing the kitchens to serve food "to-go" in open styrofoam containers with plastic utensils, individually wrapped food items, condiment packages and large open cups is turning Smoketown into a garbage dump. Guests of the soup kitchen take their "to-go" meals to the empty lots and green spaces in the neighborhood and leave the "to-go" meal trash in the green space or sidewalk. There are many empty lots in Smoketown with no resources to clean up the trash. (pictures attached).





B. OUTSIDE SECURITY STAFF REQUIRED. Soup kitchens must have someone outside managing their guests during operating hours. Queuing the line, repelling drug dealers, fights and public nuisances.

C. NO LOITERING OUTSIDE OF OPERATING HOURS. Frequent guests of the soup kitchens know that the building is vacant when not serving food. When not serving food, the building is a gathering spot for drugs, camping and selling stolen items.



After reviewing the proposed changes to homeless shelters codes, I request more accountability for:

1. The word (**STAFFED**) *What is the ratio? Is this 24/7?*
2. A shelter shall not be located within **1,000'** of another shelter that serves the **SAME POPULATION**. *Looking at the map attached, you will see there are several shelters within 1,000' of my property. Define the same population.*
3. The shelter shall meet the health, sanitation, structural, **PROPERTY MAINTENANCE**, fire, and life safety requirements of any currently applicable federal, state, and/or local laws. *Shelters need specific guidelines such as no loitering outside the shelter. There must be an indoor courtyard, backyard or equivalent.*

I am requesting an appointment to discuss these changes directly with a planner. If I have not heard back from you in a few days, I will telephone (502) 574-5860 until I reach you.

Thank you in advance for your consideration.

Aimee Overly
747 South Preston Street
Louisville, Kentucky 40203
+1 914 217 0379

747 SMOKETOWN, LLC USA

From: [Wufoo](#)
To: [Dock, Joel](#)
Subject: Comment on Land Development Code changes [#2]
Date: Sunday, March 30, 2025 4:47:58 PM

Name * Aimee Overly
Zip Code * 40203
Email * AimeeOverly@gmail.com

Comment *

The most important codes that are MISSING from this proposal are the CODES FOR SOUP KITCHENS. A Soup Kitchen is not currently regulated by the Land Development Code or Health Department Codes.

Requested Codes for Soup Kitchens:

A. NO FOOD TO GO. Soup Kitchens must be required to feed their guests inside their property at all times. Allowing the kitchens to serve food to go in open styrofoam containers with plastic utensils, individually wrapped food items, condiment packages and large open cups is turning Smoketown into a garbage dump. Guests of the soup kitchen take their to go meals to the empty lots and green spaces in the neighborhood and leave the to go meal trash in the green space or sidewalk. There are many empty lots in Smoketown with no resources to clean up the trash. (pictures attached).

B. OUTSIDE SECURITY STAFF REQUIRED. Soup kitchens must have someone outside managing their guests during operating hours. Queuing the line, repelling drug dealers, fights and public nuisances.

C. NO LOITERING OUTSIDE OF OPERATING HOURS. Frequent guests of the soup kitchens know that the building is vacant when not serving food. When not serving food, the building is a gathering spot for drugs, camping and selling stolen items.

After reviewing the proposed changes to homeless shelters codes proposal, I request more accountability for:

1. The word (STAFFED) what is the ratio? Is this 24/7?
2. A shelter shall not be located within 1,000' of another shelter that serves the SAME POPULATION. There are several shelters within a 1,000' of my property. Define same population.
3. The shelter shall meet the health, sanitation, structural, PROPERTY MAINTENANCE, fire, and life safety requirements of any currently applicable federal, state, and/or local laws. Shelters need specific guidelines such as no loitering outside the shelter. There must be an indoor courtyard, backyard or equivalent.

From: [Natalie Harris](#)
To: [Dock, Joel](#)
Cc: geklund@louhomeless.org; [Brandi Scott](#); nharris@louhomeless.org
Subject: Re: Homeless and Crisis Shelters LDC changes published
Date: Thursday, March 27, 2025 6:42:27 PM
Attachments: [image001.png](#)

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Hey Joel,

I did have a chance to review the recommendations and I do have a few concerns. I am actually out until next Tuesday, but I am around that week before we meet with CW Ruhe if you want to talk.

1) maybe this does not have to be spelled out for you because you know what these requirements all mean but I am still not clear about what is required for a shelter license versus an accessory license which I know is lessor, but I can't tell that here. I know Ruhe wants to know that too.

2) one of the biggest concerns we have with extreme weather shelter is what happened this year when it was crazy cold then we had a week of less bad and then another extreme week. This caused people to be kicked out before another big storm. It would be great to add something that allows it to stay open if weather expectations show that extreme weather will return within a week. This year we did a great job of sheltering people during the first cold snap then sent people out and several deaths took place during the second cold snap when people didn't know where to go.

3) my biggest concerns are with additional requirements being added to shelters that are not required by similar facilities. I am ok with the management and grounds maintenance requirements if other spaces where people stay overnight (maybe hotels) also require that, but not if we are only requiring of shelters.

4) and that leads to my biggest concern - we purposefully did not create a day shelter category 15 years ago because it was agreed that day shelters should be no different from other service facilities including feeding locations, ministries, neighborhood places, etc. i just want to make sure if you create something new here it is similar to all those service facilities.

Finally, this is a total aside, but this does not address the whole issue where recovery programs are getting licensed under transitional housing. I assume that is for another day.

ML

From: Wufoo <no-reply@wufoo.com>

Sent: Tuesday, March 25, 2025 9:18 PM

To: Lakhwani, Monica <Monica.Lakhwani@louisvilleky.gov>

Subject: Comment on Land Development Code changes [#1]

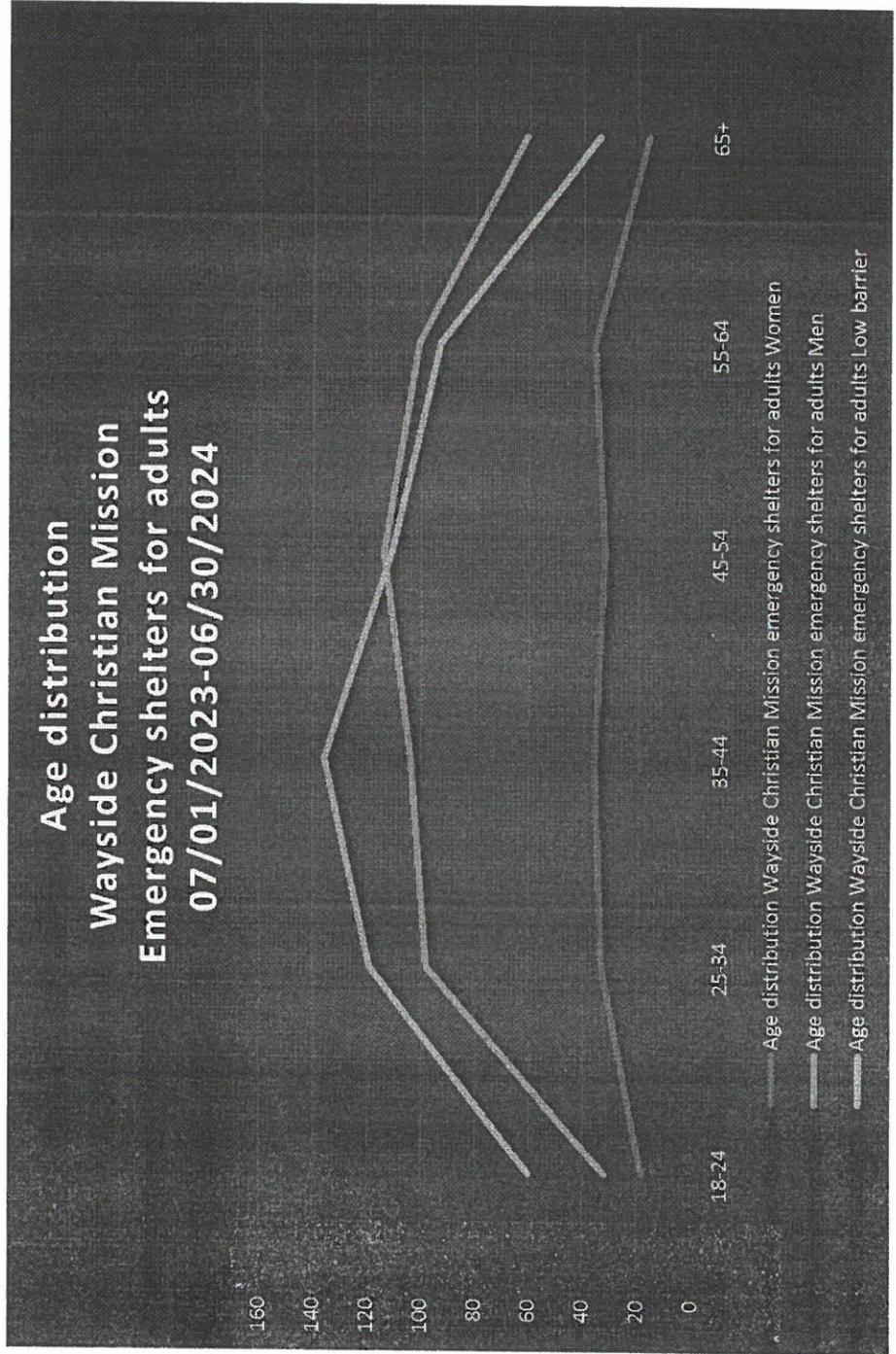
Name *	Melanie Baker
Zip Code *	40291
Email *	mbakerslp@gmail.com
Comment *	<p>Could you provide a map that shows the districts where various shelters can be situated? There seems to be 2 groups: OR, OR1, OR2, etc and RR, R-E, etc</p> <p>Also, the way I am reading the section entitled LDC 4.2 G, I can deem my home, in a residential neighborhood, as a shelter, as long as I follow certain guidelines. Is that correct??</p> <p>Thank you</p>

Age distribution

Wayside Christian Mission emergency shelters for adults

Age range / Shelter	Women	Men	Low barrier
18-24	18	32	60
25-34	33	98	119
35-44	36	104	136
45-54	32	114	111
55-64	36	101	93
65+	16	61	34

Receiving
Shovel
Mexico



From: [R. C. Webber](#)
To: [Dock, Joel](#)
Subject: Idea from this evening's listening session
Date: Thursday, August 29, 2024 8:27:25 PM

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Thanks for holding the session. I discussed the issue of older clients with the Coalition for the Homeless employee, and we will bring some sort of age distribution chart to the session at the main library.

Some comments about homelessness in the outskirts (of which Fairdale and Valley Station were mentioned as examples) gave me an idea toward the end. Homelessness in the outskirts might resemble rural homelessness more than it does homelessness in the urban core. If that is the case, it might be productive to find out what shelters, services, and regulations have succeeded in rural areas in order to use them as models for those we might place in our outskirts. In making these inquiries, you might want to start with KHC since they manage both Continuum of Care and HUD pass-through funds for the balance of state.

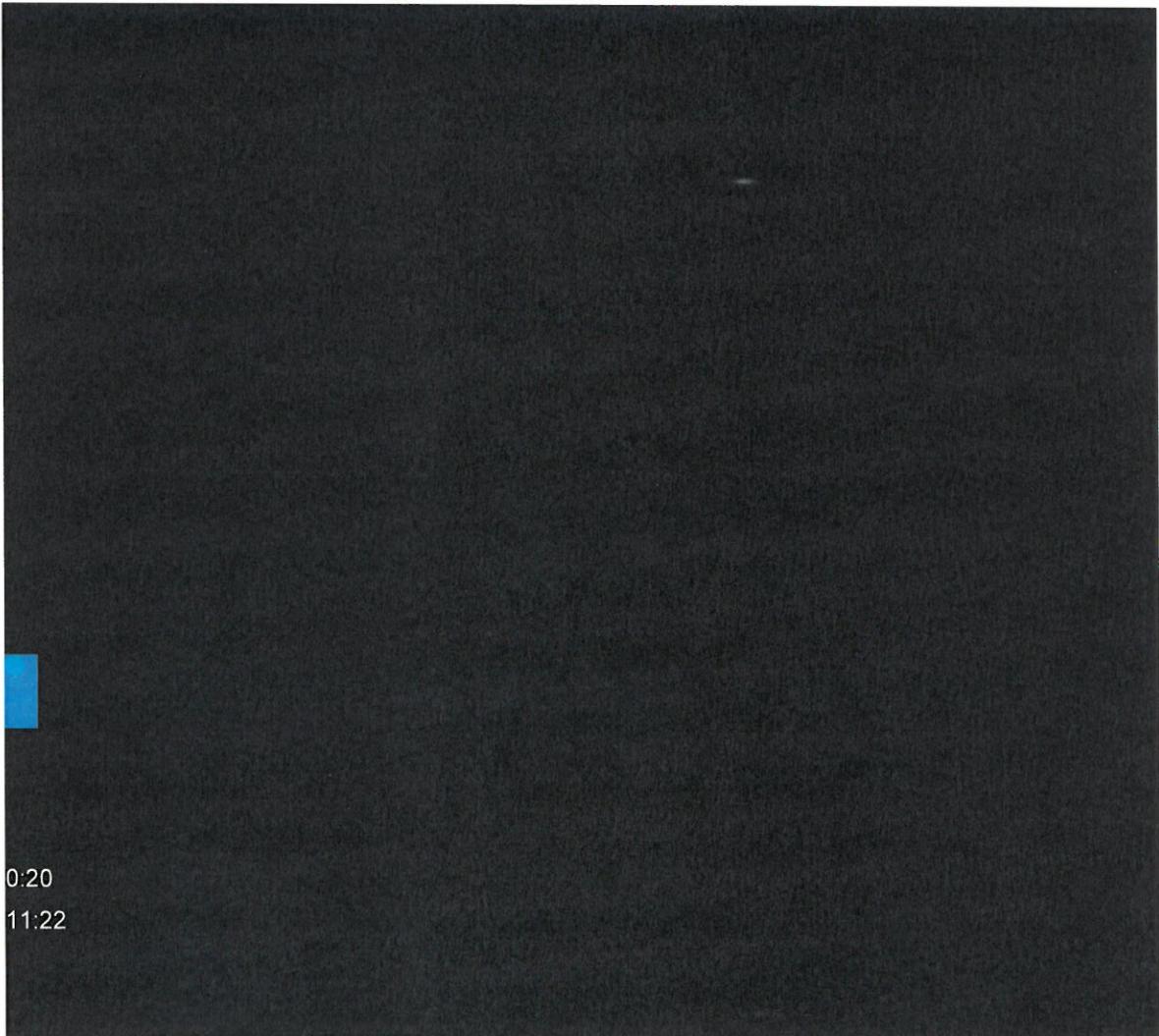
Randy

From: [Maureen Welch](#)
To: [Dock, Joel](#)
Cc: [Ann and George Ramser](#)
Subject: This is a piece of the puzzle
Date: Saturday, August 31, 2024 8:07:32 AM

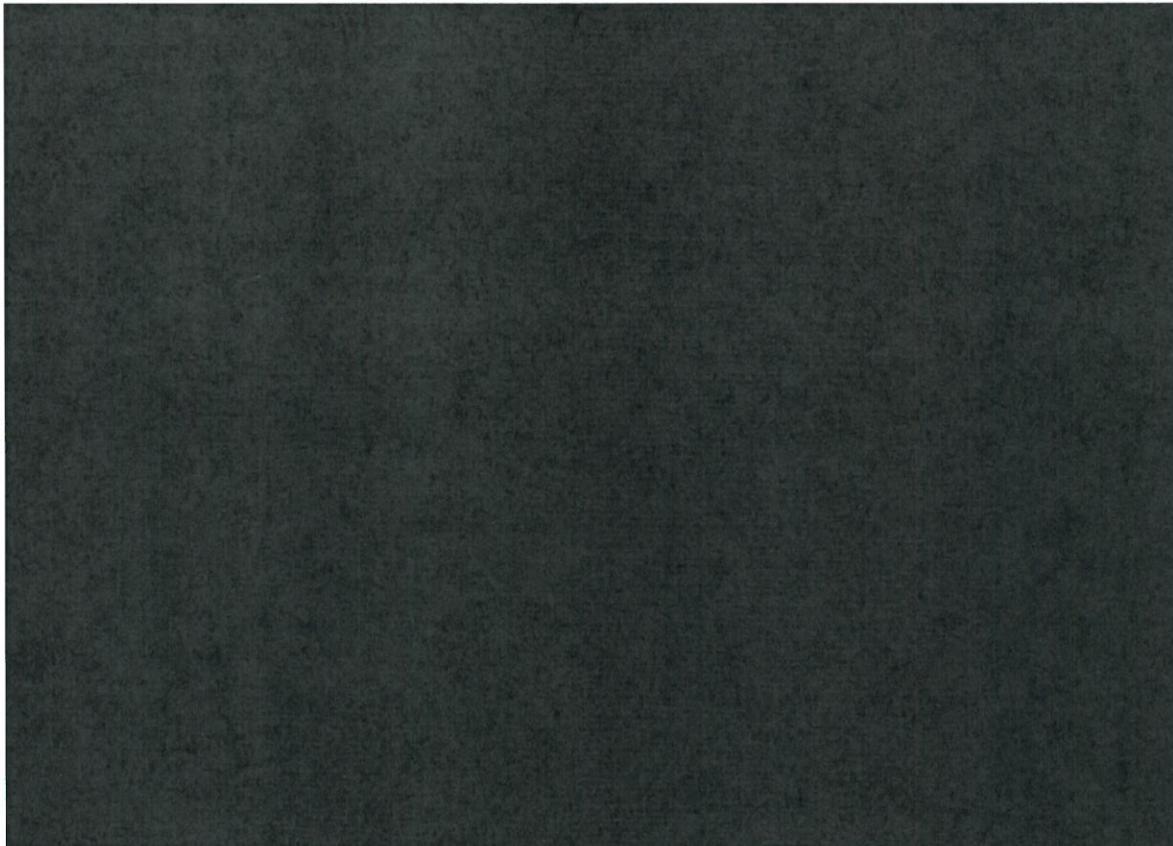
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DOJ: Kentucky violating civil rights of adults with serious mental health illnesses

Eleanor McCrary Josh Wood Lucas Aulbach Louisville Courier Journal



0:20
11:22



Kentucky is violating residents' civil rights by "unnecessarily segregating adults with serious mental illness" in psychiatric hospitals in the Louisville area, rather than providing them with care in community settings, according to a U.S. Department of Justice investigation released Tuesday.

The investigation, which began in 2022, found the state is violating the Americans with Disabilities Act by failing to provide access to community-based mental health services, including mobile crisis response, case management and permanent supportive housing.

“Instead, Kentucky relies unnecessarily on psychiatric hospitals in violation of the ADA,” a statement from the Justice Department said. “Each year, thousands of people are admitted to psychiatric hospitals in Louisville, and more than a thousand people experience multiple admissions to these restrictive and often traumatizing settings.”

Louisville Metro Government has also contributed to these issues, the DOJ found, due to deficiencies in the city's emergency response system. And a large swath of the community is affected by the systemic failures.

Seven Counties Services, one of 14 state-licensed Community Mental Health Centers in the state, which serves Jefferson County and the surrounding region, estimates 15,500 adults with serious mental illness live in Louisville, with the organization providing service to 6,000 annually.

The report includes a series of recommendations for reform, and the Justice Department said it looks forward to "working cooperatively with Kentucky to reach a resolution." However, the department could file a lawsuit to ensure the state is compliant with the ADA if the sides can't come to an agreement.

In an email Tuesday night, Gov. Andy Beshear spokesperson Crystal Staley said the governor's office was "surprised" by the report, as it had not been contacted by the DOJ since last September. She was critical of the investigation, arguing it did not do enough to recognize the hard work mental health care agencies in Louisville do and saying the administration "continues to prioritize Kentuckians' mental health."

Beshear worked to expand Medicaid access and helped launch the 988 crisis hotline during time in office, she said, among other steps to improve mental health care in the state.

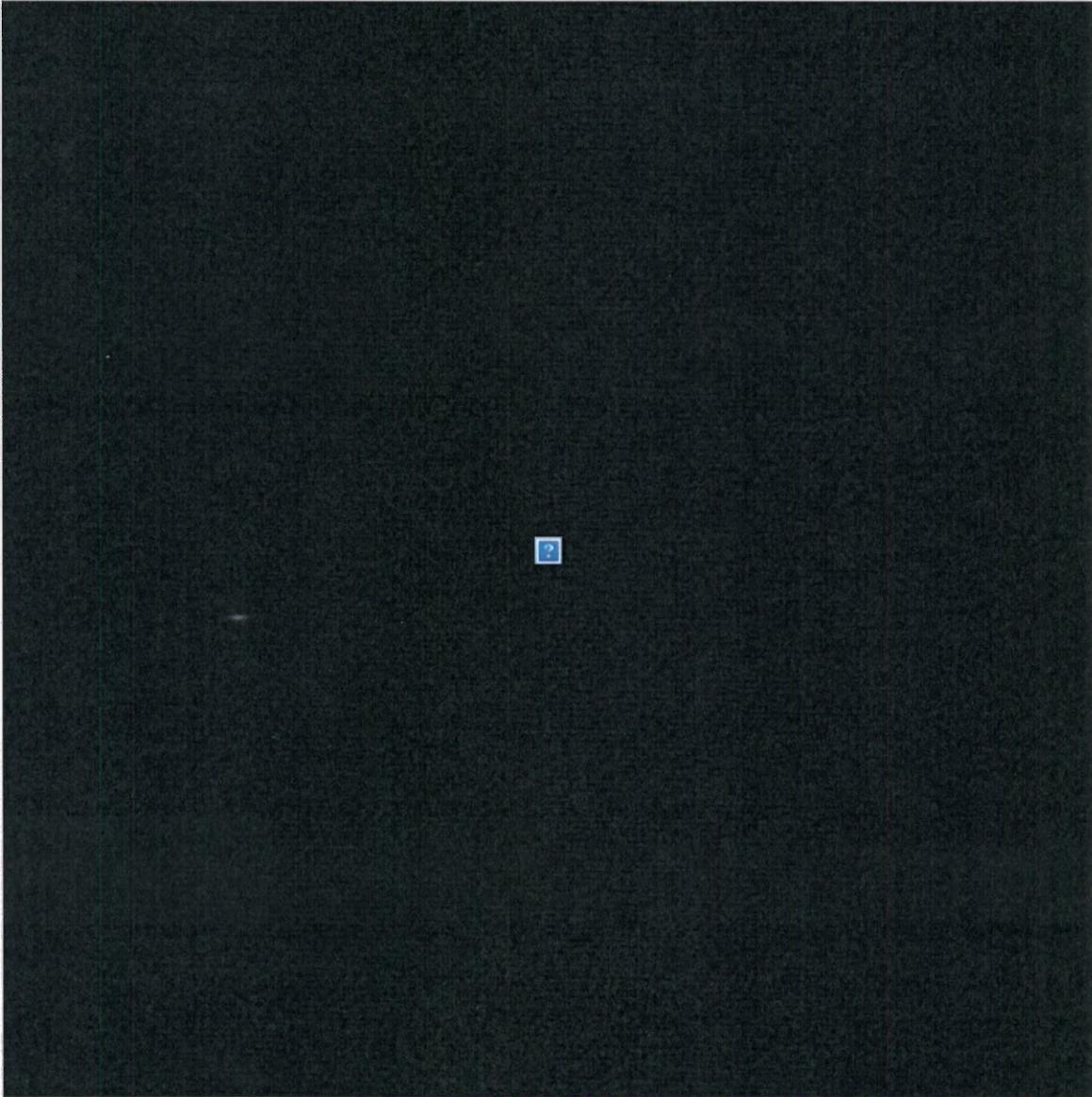
Kevin Trager, a spokesperson for Mayor Craig Greenberg, noted the report highlighted a pilot program that makes crisis teams available in Louisville and that has grown since it began in 2021. He added the lack of community-based mental health services is "a nationwide problem that leaves far too many individuals without critical, often lifesaving, care."

Staley added Beshear also "tried to implement crisis response teams, but they were not funded by lawmakers during the last legislative session."

The new report is separate from a wide-ranging pattern or practice investigation into the Louisville Metro Police Department, released in 2023, that found Metro Government and LMPD violated the ADA by "unnecessarily deploying police to behavioral health calls." Louisville is in negotiations for a consent decree with the department regarding that investigation.

The lack of community-based services has caused police to be the first responders to mental health crises, which the DOJ said resulted in unnecessary incarceration, according to Tuesday's release.

“People with serious mental illnesses in Louisville are caught in an unacceptable cycle of repeated psychiatric hospitalizations because they cannot access community-based care,” Assistant Attorney General Kristen Clarke of the Justice Department’s Civil Rights Division said in a press release.



Key findings in the DOJ report

The 30-page report, put together by the DOJ and the U.S. Attorney's Office of the Western District of Kentucky, is the result of hundreds of interviews with state officials, mental health and social service providers, along with judges, advocates, people who have been hospitalized and others who have been in the city's

psychiatric facilities.

It paints a bleak picture of how the city and its health care providers often respond when people are experiencing a mental crisis. Key issues repeated throughout the report include:

A system that puts too many people in psychiatric hospitals instead of providing services in the community (about 7,400 adults were admitted to Central State Hospital or had a psychiatric inpatient admission in Louisville in fiscal years 2021 and 2022, with more than 2,300 people returning more than once);

Repeated extended stints in psychiatric hospitals without appropriate care, leading to the loss of living skills and failures to communicate when a person is scheduled to leave a hospital;

A lack of transport for services and a lack of access to services when a patient is discharged from a hospital;

Involvement by police and law enforcement officials when more flexible community-based services could help, which leads to people suffering from serious mental illness getting unnecessarily caught up in the legal system;
"Insufficient" coordination between hospitals and community providers to establish individualized care plans for residents discharged from hospitals;
And an inpatient system that isolates people from the community for extended time periods.

The lack of sufficient community-based services ends up putting more people dealing with serious mental health issues in facilities such as Central State Hospital, a 120-bed psychiatric facility in La Grange, and University of Louisville Hospitals' Emergency Psychiatric Services wing, an emergency room that takes in about 2,250 adults each year (many with multiple visits).

"(F)or many individuals in Louisville today, police officers, EPS and hospitals are the primary options for help," the report reads. "And without a connection to long-term services, many simply reappear at EPS the next time a crisis occurs."

In a Wednesday statement, U of L Health said it "recognizes the need for more community-based resources in Louisville and across the Commonwealth to assist with the care of this population."

"We stand ready to partner with all groups interested in helping," an email from spokesperson Heather Fountaine said.

In a separate statement, Seven Counties said it is "closely analyzing" the new report, noting the organization has taken part in two community health surveys this year, with one resulting in a new behavioral health coalition in the county to encourage collaboration between local partners.

"As a community and organization, Seven Counties Services remains fully dedicated to providing quality care and health services to improve the lives of individuals and families," the statement said. "Providing community-based services and access to care for all individuals in our community including those with (serious mental illness) and/or those in crisis is at the heart of our mission."

Neither U of L Health and Seven Counties granted interview requests.

The report was critical of the system's reliance on police to serve as first responders to behavioral health crises, which often leads to "avoidable arrests."

Like its 2023 report on LMPD, Tuesday's investigation highlighted the case of a man with an "apparent serious mental illness" who was arrested by LMPD 18 times between March 2020 and January 2022. He died at Metro Corrections in January 2022 days after being arrested for refusing to leave a downtown restaurant.

Improving access to mental health resources in Louisville

In response to the report, Greenberg spokesman Trager touted Louisville's crisis diversion program, which sends mental health professionals to some behavioral health calls. That program was created after Louisville Metro Government agreed to retain social workers and dispatch them to some calls as part of a settlement over the 2020 police killing of Breonna Taylor. It was expanded to 24-hour coverage across the city last month.

The program allows non-police responders to react to qualifying behavioral health crisis emergency calls. However, calls involving weapons are not eligible for a non-police response. While the DOJ called it a "positive step," the report also said the program currently remains "insufficient to meet the need."

The report offered several recommended modifications to the system, including:

Increasing the availability of services — many good programs exist, but they're frequently unavailable and inaccessible, and the state has not ensured development of these services in its largest city;

Making services Medicaid reimbursable;

Ensuring permanent affordable housing options are accessible and available;

Improving oversight and assessment, as well as record retention;

And avoiding hospitalizations and contact with law enforcement when possible.

Trager said local officials are well aware more action is needed. But more support is needed as well.

"We know Louisville's health care providers and first responders are working hard to serve our most vulnerable residents," Trager said. "The Mayor looks forward to working with leaders in Frankfort to ensure that all Kentuckians facing a mental health crisis can get the care they need. But ultimately, cities like Louisville need our federal partners to help provide comprehensive resources and investments if we are to make the meaningful progress we all want."

This story may be updated.

Reach reporter Eleanor McCrary at EMcCrary@courier-journal.com or at [@ellie_mccrary](https://twitter.com/ellie_mccrary) on X, formerly known as Twitter. Reach Josh Wood at jwood@courier-journal.com and reach Lucas Aulbach at laulbach@courier-journal.com.

From: lgfields@iglou.com
To: [Dock, Joel](#)
Subject: Homeless
Date: Monday, August 26, 2024 1:42:45 PM

CAUTION: This email came from outside of Louisville Metro. Do not click links, open attachments, or give away private information unless you recognize the sender's email address and know the content is safe.

The homeless are similar to stray cats. The more you feed and take care of them, the more you have. I have more respect for stray cats. I have NO respect for beggars. Please remove me from any and all your mailing lists. I did NOT hold a gun to their heads to make them drunks, drug addicts, or just lazy bums.

I do realize there are some (very few) legitimately homeless people. Those should be assisted by both state and private means and methods.

To me those programs are just a waste of my hard earned money.

Larry Fields

From: lynsan3436@aol.com
To: [Dock, Joel](#)
Subject: Homeless Shelters
Date: Monday, August 26, 2024 2:11:59 PM

CAUTION: This email came from outside of Louisville Metro. Do not click links, open attachments, or give away private information unless you recognize the sender's email address and know the content is safe.

I cannot attend the meeting tonight but I have several thoughts I would like to share with you.

For shelter only, a possible use of empty, unusable shipping containers or railroad cars. All placed in an area devoted to that usage.

Investigate the MAD HOUSERS from Georgia Tech. My daughter was a member in the 1980's and you can contact her at 404.606.6332. Make sure she knows that you got her info from her mother, Sondra Harroff.

Sondra (Sandy) Harroff

From: [Larry Sloan](#)
To: [Dock, Joel](#)
Subject: Homeless meetings
Date: Monday, August 26, 2024 1:59:54 PM

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I cannot attend any of these as I am traveling. Please keep me on your email list.

I saw some moveable tiny houses on Finland recently. A fork lift can move them or load them onto a flatbed truck to be move to a new location.

They had self contained solar power and battery.

Larry Sloan
KIPDA Aging and Disabilty Council Chair
TARC Accessibility Advisory Council Chair

Larry Sloan
Mobile Phone: 502-552-3990
2304 Woodford Place
Louisville KY 40205

From: [Charles Cole](#)
To: [Dock, Joel](#)
Subject: Homeless & Crisis shelters
Date: Tuesday, August 27, 2024 2:59:11 PM

CAUTION: This email came from outside of Louisville Metro. Do not click links, open attachments, or give away private information unless you recognize the sender's email address and know the content is safe.

Has anyone suggested fitting refrigerator trailers with temporary beds and bathrooms?
They could utilize heat pumps which would provide hot and cold as needed. Also they could be staged just where needed.
Anyway just a thought.
Sent from my iPhone

HOUSING AFFORDABILITY

Nearly 12,000 metro Atlanta public school students are unhoused

Nearly 2% of the 631,274 public school students in the five-county metro area are living on the streets, in shelters or extended-stay motels, doubled up with other families, or couch-surfing.



by Sean Keenan
September 1, 2024



(Credit: Unsplash)

If an average public school classroom has 30 students, it would take nearly 400 classrooms to hold all of the students experiencing homelessness in metro Atlanta.

Across Cobb, Clayton, DeKalb, Fulton, and Gwinnett counties, 11,857 students are living without stable housing — more than enough to fill every seat in Georgia Tech’s basketball stadium and nearly enough to pack Duluth’s Gas South Arena — according to Georgia Department of Education data compiled by Neighborhood Nexus.

That means nearly 2% of the 631,274 public school students in the five-county metro area are living on the streets, in shelters or extended-stay motels, doubled up with other families, or couch-surfing.

That number reflects the challenges posed by a dire housing shortage, the expiration of pandemic-era eviction-prevention programs, and a foster care system [underserving](#) many young people and families in need of housing assistance.

The dearth of housing in metro Atlanta, as in other big U.S. cities, is by far the biggest problem, said Cathryn Vassell, the head of Atlanta’s primary homeless services nonprofit, Partners For Home. Academic Gregg Colburn best articulates the problem in his book “Homelessness is a Housing Problem,” she said.

“He describes a game of musical chairs,” Vassell recalled in an interview. “There are 10 people and there are nine chairs, and one of the people in the game is walking on crutches with a cast on their leg. The problem is not that they have a cast on their leg and they’re on crutches. The problem is that there are not 10 chairs.”

Across the metro region, the city of Atlanta has one of the highest rates of student homelessness, with 3.4 out of every 100 Atlanta Public Schools (APS) students — 1,835 students out of 54,054 total — deprived of stable housing during the 2024 school year.

That’s an uptick from 2023, when 3.1% of APS students (1,672 of 54,544 kids) identified as unhoused.

Only Clayton County and the city of Marietta have higher numbers of unhoused students, with 3.6% and 5.8% of their student bodies experiencing homelessness, respectively.

Metro Atlanta's nearly 12,000 students experiencing homelessness: a breakdown

SCHOOL SYSTEM	ALL STUDENTS	UNHOUSED	RATE	STUDENTS WITH DISABILITIES	ENGLISH LEARNERS
Gwinnett	195,292	2,345	1.2%	502	250
Clayton	56,564	2,015	3.6%	280	63
Cobb	113,658	1,941	1.7%	350	169
Atlanta	54,054	1,835	3.4%	239	47
Fulton	94,995	1,822	1.9%	281	58
DeKalb	101,292	1,258	1.2%	202	68
Marietta	9,779	564	5.8%	97	139
Decatur	5,640	77	1.4%	20	-
Total	631,274	11,857	1.9%	1,971	794
				17%	7%

SOURCE: Georgia Department of Education (SY2023-24)

Neighborhood Nexus

(Credit: Neighborhood Nexus)

A problem hard to measure

What's more, the actual number of unhoused students is likely higher. Government agencies inevitably undercount the true number, because their data mostly relies on self-reporting by parents or guardians, according to Joy Moses, a researcher at the National Alliance to End Homelessness.

Some public school systems, including APS, employ homeless liaison staff to identify students in precarious living situations. But some parents opt not to identify as unhoused when enrolling their kids in schools, out of fear that they could lose custody, Moses said.

"Some people are reluctant to self-identify, but there are some people that don't know or don't make the connection that they should be identifying themselves [as homeless], and that there might be services available to them if they do," she added.

Limited school resources play a big role, too.

“Many school systems are under-resourced,” Moses said. “Often the people who are focused on homeless services within a school district or even in a school, it’s one of many responsibilities that they have. They’re trying to execute the best way that they can, but it’s rare to see a targeted person where that’s the focus of their job and they’re not doing anything else.”

Absenteeism spikes

Housing challenges have also contributed to a sharp rise in student absenteeism statewide, according to the Governor’s Office of Student Achievement.

Chronic absenteeism — when a student misses more than 15 days in a school year — has spiked since 2019, when the COVID-19 pandemic began. Last year, 29% of Georgia preschoolers missed more than 15 school days, up from 18% five years ago. For 12th graders, chronic absenteeism shot up to 35% last year, compared with 22% pre-pandemic.



(Credit: Governor’s Office of Student Achievement)

Even for students able to attend class regularly, housing instability often inhibits their education and development, said Monica Johnson, an organizer with the nonprofit Housing Justice League.

“It makes it a whole lot harder — nigh impossible — for a child to be able to learn at school,” she said. “The issues that we face in our community flow from the lack of resources. When you don’t have a regular place to sleep, when you don’t have good food to eat, when you don’t have your healthcare taken care of, you are unable to grow as a human being and fulfill your needs and make good decisions and set yourself up for success.”

Johnson added: “If you’re constantly on alert — if you don’t feel safe and warm and content — then trying to learn something or build critical thinking skills or improve your reading or understand math concepts, it’s not going to happen.”

Building more housing could help, but the real problem is affordability, she said.

“We not only have a housing shortage; we also have a crisis of affordability,” Johnson explained. “If we build millions upon millions of units, but they are still at prices that the average person or the working person cannot afford, then we just end up in the same position that we’re in. We need to build more subsidized housing. We need to build public housing. We cannot rely on private developers to do that for us.”

Candice Weldon

September 1, 2024 at 8:51 pm

It’s really sad that we are in 2024 still dealing with homelessness. I thi.k if every billionaire in there city should make it possible for affordable housing and so forth especially these kids who’s trying to go to school so that they can get out of the situation that they are in. I really wish I had some money. But soon and very soon our heavenly father is going to do away with it all. There will be no more death, sickness,or hunger.

Joe

September 3, 2024 at 8:15 am

They aren’t “unhoused” they’re f***** homeless. Loose the euphemisms.

Tiffany Read

September 3, 2024 at 9:11 pm

Homeless doesn't always mean they don't have a roof over their head. In fact, regarding children it rarely does. It means they don't have a permanent residence and an address that is permanent.

Maya

September 3, 2024 at 8:20 am

Wow this is a huge issue and I'm sure the numbers are actually higher. Me and my siblings would've definitely been a part of these numbers a few years ago when we were still in school. It's hands down an affordability issue and an outdated system when it comes to evictions! They say evictions after 5-7 yrs shouldn't impact you when applying for housing but that is not the truth!!

Monica DeLancy

September 3, 2024 at 9:58 am

Some people who reside with family members don't consider their selves homeless and some people who choose to reside in extended stay motels don't consider their selves homeless because you have to pay the motels.

The truth of the matter it is extremely hard for a single income household to remain housed paying rent especially with children in the household.

There should be more conversations with families of the importance of residing together, choosing households that are large enough for larger families, (you can't force 8 people in a 2 bedroom house and expect comfort) Families need to choose activities and enrichment activities that are beneficial to the family, family have to value and support each other in order to thrive.

Once this happens then generations can be more empowered to work on policies and understand the value of civic engagement.

Pauline A Green-Brissett

September 3, 2024 at 11:16 am

I'm sorry for the confusion with the children in Atlanta. I hope some people who are doing well in their life could help with these children.

Kylar D Lawrence

September 3, 2024 at 11:54 am

Sad sad world we are in... even us working people living like we don't even have a job,, go to work everyday to still remain hungry and staying in hotels and rooming houses n shit..not fair at all to nobody

Ameera

September 3, 2024 at 1:42 pm

The truth is these schools and programs make it harder for us. It's never no help or funding or an extra long waiting list. Also the schools require so much to enroll a homeless child. I understand now y it's so many homeless older ppl on the streets because after 2 yrs of trying you kinda lose hope and get used to it. I'm a single homeless mother of 4.

Single mother with a hateful popular baby dad

September 3, 2024 at 4:23 pm

Why are they comparing extended stays to homelessness. They have kitchens, are big enough to be a studio in a “normal” apartment complex, and cost as much if not more than many “normal” apartment buildings.

Your lease at an extended stay counts as a home for a week, or month, whatever way you pay. It’s not being homeless at all and makes a way for people who have money, but may not be included and clicking or popular enough to get their application past the front desk at an apartment that listens to there special friends about who is allowed or not to have a full year lease. If you want to report it, keep it 100.

Nobody has time for your half truth. The cancel culture is very alive and you lie and ignore them for their support. Make not right to work states a right to work states and hold these secretaries without degrees or

License to higher integrity and enforce the issue of discrimination they pursue with punishment for their need to leave half the country they don’t like without a way to get a year lease. Which helps them prove that although a family is cool and hard working. You wanted them to look incompetent over personal opinion and don’t want them to be successful. It is what it is and anyone know that. Thanks to the extended stays. Many people who have been subject to the cancel culture and there need to discriminate without it being able to be proven and get away with it by people who act deaf mute and dumb are the problem. Thank god for extended stays or many single mothers would be a hoe or homeless just because in high school the lady who now an adult and runs the front desk still don’t like her and thinks it’s funny for people to be homeless. Thanks to the extended stay not the welfare system or reporters. Many people feel normal and can be a part of a neighborhood. Being in an extended stay is not homelessness honey and I resent this article and the representation is being used and didn’t do their research well before they thought they knew what it was to walk in another shoes. Your wrong, your article may help to end long term stays, and that makes you part of the problem and a sucker for it.

Joe

September 4, 2024 at 7:29 am

So why aren’t the parents charged with a crime? It’s called vagrancy, not homeless or unhoused. These are parasites living off society.

Please share your thoughts on Homeless & Crisis Shelters



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PLANNING

Name:

Zip Code:

• Eastern
Area
Community
Ministries

- Centralization of services as policies disperse the population; emphasis on having services throughout the county
- Panhandling - How can we differentiate issues?
- Norton Brownsboro Area? Close to low barrier entry jobs
- Pedestrian danger in suburban areas
- Need plan for how you will physically connect people to services before allowing
- Is there a map of homeless shelters?
- How much do we know about why people are in low-service areas?

- Incentivized to report homeless encampments; population is being decentralized from downtown
 - NYC has program to support encampments: trash cans, hygiene requirements, self-regulated
 - Medical respite
 - Center for Women + Families: DV shelter
 - Flexibility in types / regulations
 - Vacant spaces (commercial) for new shelters
 - Landlord regulations / affordable housing (x2)
 - Churches using land to build housing
 - Residential mental health services
 - Educating the community; NIMBYism
- Community Land Trusts
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