



March 16, 2016

Homelessness & Poverty Committee  
Councilmember Marqueece Harris-Dawson, Chair  
Councilmember Jose Huizar, Vice Chair  
Councilmember Mike Bonin  
Councilmember Curren Price  
Councilmember Gil Cedillo  
200 N. Spring Street  
Los Angeles, CA 90012

Re: Item 1-Los Angeles Municipal Code (LAMC) 56.11

Dear Councilmembers,

Established in 1924, the Central City Association (CCA) is Los Angeles' premier business advocacy organization, with 450 members employing over 350,000 people in the Los Angeles region. CCA represents a broad swath of the businesses that drive the Los Angeles economy, and we know sustaining this economic growth is contingent upon our ability to tackle complex issues such as homelessness.

On January 25, 2016, the Public Works and Gang Reduction (PWGR) Committee considered ordinances relative to amending Section 56.11 of the LAMC to address the storage of personal property in public areas. The committee approved Alternative B of the ordinance and amended the ordinance to provide greater flexibility regarding the deconstruction of tents. CCA supports the ordinance as amended by the PWGR Committee.

We must encourage as much voluntary compliance as possible from homeless individuals to deconstruct their tents daily between the hours of 6:00 a.m. to 9:00 p.m. given the limited resources of the Los Angeles Police Department and the Bureau of Sanitation Environmental Compliance Officers (ECOs). The ordinance should allow ECOs to primarily address tents and excess personal property in public areas.

The ordinance from the City Attorney transmitted to the PWGR committee only leads to a violation if a person refuses to remove a tent and obstructs removal. This is unreasonable in light of limited city resources. It would require the continued involvement of the LAPD to have tents deconstructed on a daily basis, which is not practical or the best use of resources. It also does not meet the City's goal of decriminalizing homelessness.

In addition, it is important to remember that there are currently 16 ECOs citywide and it is unrealistic to think they will be able to return to an area multiple times to cause tents to be deconstructed. This is especially impractical given that tents are allowed to be erected from 9:00 p.m. to 6:00 a.m. due to the *Jones Settlement*. The City Council should consider allocating additional resources to increase the amount of ECOs.

Under the City Attorney version, the ordinance is essentially unenforceable and continues to leave communities vulnerable to significant health and safety impacts. This is unfair to homeless individuals, business owners, residents and other community stakeholders.

The ordinance as amended by the PWGR committee leads to a violation if a person refuses to deconstruct a tent or obstructs removal. This makes the ordinance more likely to be enforced since it allows ECOs to conduct spot-checks across the City and ask for tents to be deconstructed. This slight amendment will encourage voluntary compliance with daily tent deconstruction which should be the City's goal.

The ordinance and the accompanying guidelines must work together to promote clean and safe public areas. While there is a storage facility in Downtown Los Angeles, CCA recognizes the need for additional storage facilities citywide so homeless individuals can voluntarily store their belongings. Voluntary storage is a critical component of maintaining our sidewalks in an accessible manner. CCA will continue to support the allocation of new City resources to create storage facilities. We also believe the City should move forward with keeping the existing winter shelters open year-round and 24 hours day. CCA greatly appreciates the El Nino Homeless Emergency Shelter ordinance recently adopted by the Planning, Land Use and Management Committee.

Right now you have the ability to adopt an ordinance that will promote healthy and clean communities for all. Downtown has suffered far too long from the serious health and safety impacts associated with people living on the street indefinitely. CCA remains committed to partnering with the City and County to support solutions to address homelessness and we hope we can count on your support.

Sincerely,



Carol E. Schatz  
President & CEO

CC: The Honorable Eric Garcetti, Mayor, City of Los Angeles  
The Honorable Mike Feuer, City Attorney, City of Los Angeles