

## Communication from Public

**Name:** CD11 Coalition for Human Rights  
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**Comments for Public Posting:** We hereby submit the attached file.

To: LA City Mayor Karen Bass and Staff

LA County Supervisor 3rd District Lindsey Horvath and Staff

LA City Council Person District 11 Traci Park and Chief of Staff

LAHSA Chief Executive Officer Dr Va Lecia Adams Kelum and Staff

LAHSA Commission Chair Lindsey Horvath and Commission Board

CC: LA City Administrative Officer Matthew Szabo and LA City Council Files

Date: February 2, 2024

From: CD11 Coalition for Human Rights



We are a coalition of organizations and individuals in LA Council District 11 that supports the human and civil rights of unhoused people, advocates for safe, decent and affordable housing, and supports tenants' rights. We submit this response to the October 12 [City Administrative Office \(CAO\) Report](#) on people experiencing recreational vehicle homelessness, the 04/03/22 [Safe Parking Program's Scope of Required Services](#) (SRS), and recent City Council proposals to restrict parking.

## **Summary**

Our coalition is in favor of humane solutions for low-income people living in RVs. We strongly oppose systems that criminalize, displace or otherwise harm low-income people living in RVs.

We urgently request that the City of Los Angeles and Los Angeles County adopt a trauma-informed approach to housing low-income people living in vehicles. Such an approach, whose guiding principles are safety, choice, collaboration, trustworthiness, and empowerment, would reject coercive practices, uphold the dignity of unhoused individuals, and prioritize the following:

- Providing access to permanent, stable housing linked with voluntary services, as needed,
- implementing citywide the trauma-informed attributes of the CD7 RV Pilot Project instead of the current CAO RV strategy or towing operations through Inside Safe,
- improving and expanding the City's Safe Parking program, and
- tolerance during this extreme housing crisis.

The current process in Council District 11 is aimed at permanently removing RVs through creating parking restrictions and No RV Zones (including bullards and fences) that result in reduced public parking.

- Areas and streets with overnight parking restrictions and Zones that permanently ban RVs from an area are often initially cleared with Sanitation Sweeps (aka CARE+). These sweeps, combined with "temporary no parking signs," lead to impounding those lived-in vehicles that are unable to move and the forced displacement of the rest.
- There is no offer of adequate shelter or housing once the above has taken place.
- After the immovable vehicles are towed and the others displaced, the Council District installs permanent signs, fences or bollards to keep RVs from returning.

Coercive practices like sweeps undermine the dignity of RV dwellers, and the presence of armed law enforcement officers at the enforcement sites subverts their sense of safety and trust in governmental authority.

Council districts and areas adjacent to CD11 - both cities and unincorporated areas of the County - should also oppose the coercive CD11 approach as the RVs being displaced will end up in those areas.

We oppose removing individuals from their RV unless they are offered and voluntarily agree to temporary shelter that includes a path to permanent low income housing as well as necessary resources and services. In other words, we recommend rejecting current CD11 practices and instead embracing the trauma-informed CD7 RV Pilot Program model.

## **Council District 7's RV Pilot Program Should be Expanded Citywide**

The RV Pilot Program in CD7 is a humane program. It allows people to voluntarily transition into interim housing, offers vehicle storage options, and offers incentives to trade in their vehicles for disposal. As of August 10, 2023, the pilot program has placed 75 individuals into temporary housing, eight people have been permanently housed, and eleven individuals have returned to living on the street or to an unknown location since its launch.

Eighty eight percent of participants continue in the program. According to West Valley Homes Yes! (the non-profit service partner for the CD7 pilot), this high retention rate is due to their commitment to working with people based on their individual needs throughout the entire process, from the initial contact to achieving permanent housing. We expect that the CD7 Pilot Program would be able to place even more people in permanent affordable housing, if the City would energetically approve and facilitate affordable permanent housing projects (like the proposed Dell project in Venice) throughout the city.

In November, 2023, the LA City Council passed a motion to examine expanding the pilot program to the rest of Los Angeles. As they review it, we would like the council members to keep in mind the following:

When it comes to assisting people to transition from living in their RV to temporary or permanent housing, it is critical that the program be voluntary, that there be coordination with necessary services, that the focus of the program is on interim housing that meets the individual need, and finally that the focus is not on the destruction of their vehicle. The program should not utilize coercive practices or law enforcement.

### **Critique of the CAO RV Strategy and CAO RV Report**

The October 12, 2023 CAO RV report uses weak statistics to support aggressive actions that vilify the poor.

The data cited in the report is lacking vital details. The data provided does show a wide disparity between the number of enforcement activities and the

number of people housed. The resources (housing or Safe Parking) simply do not exist to help the quantity of RV dwellers required to excuse the current aggressive action against people living in extreme poverty. Therefore, any recommendation that expands the city's power to tow or scrap an RV is unconscionable.

#### Problems with Metrics & Data

- The 2023 Point In Time (PIT) LAHSA count indicated 4,092 RVs in LACity [CAO report, p. 3]. We believe that this is a considerable under count.
- Inaccurate and out of context data creates a false sense of urgency that will justify the use of coercive tactics against vehicle dwellers for the benefit of housed residents. We note that the unhoused count continues to grow despite the existing tactics used by LACity to somehow control homelessness.
- The report provides no data that shows a successful match between referrals and resources. A referral without the actual resource is meaningless. Most often it puts clients on a years-long waitlist. Giving clients false hope is a cruel way to create deceptively positive statistics. The CAO Report reveals that of the 765 vehicle dwelling encampment operations between May 2022 and September 2022, there were 206 LADOT Parking citations, 83 LASAN environmental hazard citations and 121 towed vehicles. In lieu of housing, criminalization.
- The five months of this data is from 2022, outdated considering the report is October 2023 and data is expected every six months.
- No data provides the cost of these operations, which ought to be completely transparent and should include the cost of law enforcement used.
- The CAO Report states that 50 of the low-income people living in vehicles (assuming in reference to the 765 operations between March 2022 and September 2022) were moved into shelter beds, shed shelters, and hotel rooms.
  - There is no real count of how many actual people lived in those 121 towed RVs.
  - There is no information on hotel length of stay or if a path to permanent housing is provided.

## **Problems with Current Strategies to Address RV Homelessness**

- The first-named primary objective of the CAO's coordinated oversized vehicle dwelling operations claims to be to "offer services and resources" [CAO report p.3]. However, if resources and services do not exist in any reasonable or quantitative way, providing "services and resources" cannot be achieved..
  - Needed resources include access to low-income permanent housing, long-term hotel options with a path to permanent housing, Safe Parking for Oversized Vehicles, and other options more desirable than living in a vehicle on the streets.
  - Needed services include trash pick up, septic pumping, simple septic repairs, CAPP parking ticket assistance, DMV registration assistance.
- Without reasonable resources or services, the CAO RV strategy is left with the remaining primary objectives: "to address public health, safety, traffic, and welfare hazards associated with vehicle dwelling and abandoned vehicles." These objectives, though important to all residents, are addressed through measures designed much more to satisfy housed residents and businesses rather than to help RV Dwellers.
  - For example, four of the five protocols designed to achieve these primary objectives are as follows:: #2 addressing debris and hazardous conditions, #3 investigating any ancillary criminal activity, #4 providing notice of parking enforcement and impoundment, and #5 impounding vehicle dwellings.
  - The resulting on-the-ground experience for the low-income people living in vehicles are outreach to nothing, harassment, excessive parking tickets, citations for leaking septic, and towed homes.
  - The CAO report recommends expanding the city's power to tow and destroy RV's without voluntary relinquishment. It suggests that the City: "petition the State Legislature to amend Section 22670 of the California Vehicle Code to define "Low Value Vehicle" as any vehicle appraised at \$2,000 or less and to authorize the destruction of such vehicles with an amendment to section 22851.3 CVC, allowing for vehicles that pose a nuisance

to by-pass the process and expedite the disposal of these vehicles” [p.15].

- The phrase “vehicles that pose a nuisance” is overly broad and provides potential for abuse. The reason provided for lowering their monetary value (“The statutory values were passed decades ago and are outdated”) totally neglects the human value of the RV to someone in need of a home and shelter. It only expands the city’s power to take it away. It reveals a coercive rather than a trauma-informed mind-set.

### **SAFE PARKING - LAHSA RULES, CAO REPORT CRITIQUE & RECOMMENDATIONS**

On March 23, 2023, the office of the City Administrative Officer (CAO) was instructed by the City Council to “Provide a plan to establish 24-hour safe parking locations for RV’s” and to expand “Safe Parking programs, to include oversized/larger RV’s in 24-hour locations with supportive services.”

Oddly, none of the seven recommendations to the City Council (p.2) address safe parking for RV’s, although the issue is discussed at length on pp. 9-12. Instead, the focus of the recommendations is on vehicle recycling, voluntary RV relinquishment (as in CD 7’s pilot program), and rehousing (even though enough affordable housing does not exist). The last sentence of the report explains why it offers no recommendations for safe parking: “The recommendations in this report comply with the City Financial Policies in that budgeted funds are being used to fund recommended actions.”

The discussion on pp. 9-12, taken together with the 4/25/22 “Safe Parking Program Scope of Required Services (SRO),” reveals an ideal safe parking program that would include expensive services, including case managers, security personnel, bathrooms, showers, and financial assistance to repair vehicles and acquire insurance.

However, at a recent meeting of the Venice Neighborhood Council’s Homelessness Committee, Juan Fregoso, Director of Homelessness & Housing in Councilmember Park’s CD 11 office, stated that such required services are way too expensive. He implied that therefore RV Safe Parking

could not happen, at least not in CD 11 parking lots. Apparently the city prefers to spend millions on enforcement, issuing parking tickets that people are unable to pay, and CD11 continues with strategies that primarily impound and displace rather than house. Given these costly enforcement strategies, saying that we can not afford Safe Parking for RVs is specious.

In the very near future, we expect the City to create a budget that will allow the CAO to heed the March 23, 2023 instructions regarding 24-hour RV parking. To make its task easier, we make public lot suggestions concerning locations for 24-hour parking as well as for 10-hour overnight parking, which is needed immediately and would not cost nearly as much. First, however, we will offer some recommendations concerning the current safe parking programs, which need to be immediately expanded and whose barriers to enrollment must be lowered.

We note first that “none of the city funded Safe Parking Program locations operate 24-hours per day, nor do they serve...RV’s” (CAO p.8). Utilization of the 13 current safe parking lots (one of which is in CD 11 with 28 parking spaces at the Veterans Administration in Westwood) is currently only 55% (full?) (CAO pp. 7-8). It is perhaps this low utilization that prompted the City Council to ask LAHSA for “recommendations for changes in the Safe Parking program requirements to lower barriers of entry for people experiencing RV homelessness” (Nov. 2, 2022, CAO p.8). We do not find such recommendations in the CAO report, so we will identify some steps we believe would help.

The basis for our recommended changes is the list of rules in the “Safe Parking Program SRO” mentioned above.

- First, drop the requirement to prove homelessness. A simple signed statement should suffice. (See rule 3 on p.1, and Appendix I pp.11-12)
- Second, drop the requirement that registered owners have a driver’s license if the driver is renting the vehicle. (Rule 4.2.1, p. 2 and Appendix I p.13). The California DMV website does not indicate that a driver’s license is necessary in order to register a vehicle.
- Third, drop the requirement for proof of vehicle insurance. When we park in public parking lots we are never asked for proof of insurance.

Why should it be different for folks who are living in vehicles? (Rule 4.5 and Appendix I p.12)

- Fourth, drop the requirement to actively pursue housing (since it does not exist in sufficient amounts) or other goals (since the expensive services required do not exist). (Rule 15.2, Appendix II p.14, and Exhibit A #23)
- Fifth, drop the ability to expel someone who will be hospitalized or incarcerated for 7 days or more. [The report uses the word "exit" instead of "expel" here and elsewhere, but "exit" is not, in fact, a transitive verb, and it has the effect of making the expulsion seem less dire than it is.] (Rule 17.5, p.8.)
- Sixth, drop the requirement to renew participation every 90 days. (Rule 15.1 p.7). This adds a layer of paperwork that seems unnecessary, especially for overnight parking. Double to every six months or drop entirely.
- Seventh, drop the necessity to provide proof of income unless it is needed for a full-service program that will offer financial assistance. (Appendix II, p.14)
- Lastly, some of the Rules for LAHSA-Administered Safe-Parking (Exhibit A) are petty and are likely to have an adverse effect on utilization rates. For example, Rule 11, which prohibits alcohol, drugs and smoking. We agree that these things are bad for one's health, but if they are done inside a vehicle they should be allowed. Rule 18 forbids using sinks for washing one's body (instead of just hands and face). Many of us use sinks for sponge baths in our homes—why shouldn't unhoused people be able to do the same?

To conclude our comment on Safe Parking issues raised in the CAO and Safe Parking SRS reports, we would like to emphasize that the city needs to establish full-service Safe Parking for RV's. Recent surveys of RVs in Venice, Mar Vista, Playa Vista, and Westchester suggest strong support with 65% in favor of Safe Parking.

Unfortunately, as envisioned in both reports— RV villages on 5-acre lots with showers, bathrooms, sanitation services, mental health services, case management services, financial aid, and housing aid – Safe Parking remains a dream not a reality, and Safe Parking is needed now. We are in an emergency and must immediately find solutions focused on the needs of

unhoused residents for parking in the vehicles that keep them secure from assault and foul weather. 75,000 unhoused Angelenos means we are in a crisis, a crisis that must pull us all together as a community to ensure the welfare of all.

## **IMMEDIATE SOLUTIONS**

We ask that the Board of Supervisors and the City Council set aside 275 parking spaces in each district for overnight safe parking for oversized vehicles for a total of 4125 spaces throughout the city. This number of spaces would cover the number of RVs found in the 2023 PIT count (CAO report p.3).

These spaces could be divided between designated streets and public parking lots. **In Venice alone there are over 1650 LACity spaces in this public-parking-lot-rich area of CD11**(see Appendix A for lots suggested for Safe Parking). In addition to the parking lots listed in Appendix A, we have noted a few streets in Venice that would be good for safe overnight RV parking. For example, the south side of Washington Bl between Oxford Ave and Palawan Way and Rose Avenue between Penmar and Walgrove, 3rd Ave between Rose Avenue and Sunset Avenue.

Finally, we ask that Los Angeles install public bathrooms throughout the city. Public bathrooms, it seems to us, are the mark of a civilized city, and we want to live in a civilized city with all our neighbors, housed and unhoused.

IN CONCLUSION, we are calling for a humane response to the huge number of Angelenos whose only home, whose only shelter against weather and violence is a recreational vehicle. We strongly oppose systems that criminalize, displace or otherwise harm low-income people living in RVs. We want no more streets designated as "No overnight oversize vehicle parking." We ask that you respect the dignity of all who live in our City and County, not just the housed citizens who are more likely to vote and contribute to campaigns.

## APPENDIX A

### **CD11 and Westside Public Lot Suggestions for Safe Parking**

LADOT Lot 613. This (LACity) public lot/s in Venice by SPARK on Pisani Pl. There are two separate looking lots there with a total of **55 spaces**. This lot was identified previously for shelter by LACity.

<https://maps.app.goo.gl/Rz9XeCQHNBUCmEB56>

LADOT Lot 701. This (LACity) public lot of **150 spaces** is used for Venice Farmers Market on Friday mornings, but it is empty & closed most of the time. Entry is from Dell between Venice Bl N and Venice Blvd S. Good for 24/7 Oversized Safe Parking with a one daytime beach lot permit for Friday's during the time of the Farmers Market.

<https://maps.app.goo.gl/aGSGbvbddnuWan3N7>

LADOT Lot 740. This (LACity) Venice lot with **41 spaces** was closed at night recently just to get rid of vehicle dwellers (!), nighttime public parking was removed without a Coastal Permit.

It could be used for a small vehicle night parking program (pull in and pull out). Entry is from Rose Ave to 301 S Main St.

<https://maps.app.goo.gl/NFgBdNszxbUj1jva9>

LADOT Lot 759. This (LACity) Venice lot has **66 spaces**

LADOT Lot 617 1411 Electric and Lot 616 1511 Electric total **51 spaces** (both originally Railroad Right-of-Way property converted by LACity from free dirt parking to paved meter parking - the required Coastal Permits were not found). All three could be used for a small vehicle night-time parking program (pull in and pull out).

<https://geohub.lacity.org/datasets/city-owned-parking-lots/explore>

The furthest north day uses the Dockweiler (LACounty) parking lot by Playa Del Rey and El Segundo. It is not near any services but is a good location for some independent RV dwellers for 24/7 oversized vehicle Safe Parking.

Entry is from Vista Del Mar & Imperial Hwy. Take Dockweiler entrance and then go north all the way to the last lot on S Marine Ave.

<https://maps.app.goo.gl/JPWsm5NXegAowrP46>

Westchester location. This is barely used, obscure LACity parking, located next to the bus where service is accessible. It is perfect for a 24/7 oversized Safe Parking program. Entry is from Lincoln Blvd between Loyola Bl and LA Tijera Bl just south of the Westchester Pool.

<https://maps.app.goo.gl/FiqSdnPoHPwduWCi8>

Marina Del Rey public parking lot 7 (LACounty) This lot is often empty, perfect for 24/7 Oversized Safe Parking, is not that far from the bus line on Washington Blvd, near a Trader Joe's, and service accessible including Venice Family Clinic street medical outreach. Definitely good for disabled people, family RV dwellers and those with dog companions.

Entry is from Admiralty Way in MDR

<https://maps.app.goo.gl/5QJdJqToqVRf91VK7>

Marina Del Rey public parking lot 8 (LACounty). This lot is empty most of the time, perfect for 24/7

Oversized Safe Parking, is right on the bus line on Washington Blvd, is service accessible including Venice Family Clinic street medical outreach.

Entry is from Washington Blvd or Admiralty Way in MDR

<https://maps.app.goo.gl/JbxqwKpfhjEjUbrG7>

Will Rogers parking lot 1, run by LACounty. Off Hwy 1 just N of Santa Monica. It's not near any services, but often empty and good for more independent RV dwellers. Good for 24/7 Oversized Vehicle Safe Parking.

<https://maps.app.goo.gl/e7M4DabJUeNRRBxs5>

There are three very large beach parking lots along Venice beach, owned by LACity and run by LACounty. They close at night and during warmer seasons are generally busy with beach visitors. They all have restrooms and any one of them could have a section used for Safe Parking. Probably the Venice Blvd lot is best. But the Shower of Power is already going to the Rose Ave lot every Thursday. All very accessible to services.

\*\*Washington Blvd lot with 380 spaces

<https://maps.app.goo.gl/6MfwKpGWaEmFFQ8t8>

\*\*Venice Blvd lot with 303 spaces

<https://maps.app.goo.gl/SikFgzJGsMePFxUP8>

\*\* Rose Ave lot with 288 spaces

<https://maps.app.goo.gl/CTYUUPs45uBnnAQe9>