

# LOS ANGELES POLICE DEPARTMENT



**CHARLIE BECK**  
Chief of Police

P. O. Box 30158  
Los Angeles, California 90030  
Telephone: (213) 486-9110  
TDD: (877) 275-5273  
Ref #: 11.2

**ANTONIO R. VILLARAIGOSA**  
Mayor

August 14, 2012

The Honorable City Council  
City of Los Angeles  
City Hall, Room 395  
Los Angeles, California 90012

Re: Proposed Ordinance Amending Sections 12.03, 12.21, 12.22, 12.24,  
and 14.00 of the Municipal Code

Honorable Members:

On behalf of the Department, we appreciate the opportunity to conduct a preliminary analysis of the proposed amendments to the Los Angeles Municipal Code Sections 12.03, 12.21, 12.22, 12.24, and 14.00. The Department recognizes the goal of maintaining a balance between expanding the housing opportunities for residents of Community Care Facilities, while maintaining the public safety and quality of life for existing residents of the community. However, it is imperative that we preemptively, versus reactively, manage the specific uses of housing with forethought and regulatory protection.

The Department has analyzed the proposed ordinance amendments and categorized the following facilities as "High Risk" for becoming a nuisance:

- Alcoholism or Drug Abuse Recovery or Treatment Facility;
- Community Care Facility;
- Parolee-Probationer Home; and,
- Boarding or Rooming House.

As the ordinance stands, a number of deficiencies were discovered that have the potential to increase criminal activity and affect quality of life issues of the surrounding communities. The Department respectfully asks the City Council to include the following recommendations, not appearing in the current ordinance, which would support the Department's efforts in crime reduction and community safety related to these High Risk facilities:

- It is recommended that standardized licensing for High Risk Facilities include being bonded, State licensed, insured, and granted a Business license from the City Office of Finance.

- It is recommended that the City Department of Planning maintain a database to manage/track licensed High Risk Facilities that receive government payments for residents; the database will also provide valuable information to public safety entities to find and prevent abusive facilities.
- It is recommended that the City Department of Planning define the maximum saturation as one High Risk Facility per square mile. There are approximately 468 square miles in the City of Los Angeles, which potentially allows for 468 facilities.
- It is recommended that the City Planning Department reserve the right to deny the permit of a High Risk Facility if it would be detrimental to the community. Such determination may be based upon any environmental factors such as historically high crime trends; proximity to revitalization areas, daycare facilities, R1 or R2 zones, school Safe Passage Zones; or any other unique quality of life factor.
- It is recommended that High Risk Facilities be restricted from operating within 1000 feet from a liquor store, motel, school, recycling center, marijuana dispensaries, or to the restrictions listed in 12.70 LAMC-Adult Entertainment Zoning.
- It is recommended that the Department of Building & Safety conduct spontaneous inspections paid for by the High Risk Facility.
- It is recommended that the Department of Building & Safety establish a standardized visitation policy for all High Risk Facilities that regulates visitation and thwarts overcrowding, subleasing, squatting, etc.
- It is recommended that each High Risk Facility be required to obtain a Conditional Use Permit (CUP) that identifies specific conditions to protect the community from criminal behavior and secondary impacts.
- It is recommended that High Risk Facilities maintain identification records of residents, similar to 41.49 LAMC-Hotel Registers and Room Rentals, and that Peace Officers as defined in 25755(b) B&P, have unencumbered access to inspect such records.
- It is recommended that each location be equipped with clearly posted signage providing the following information: the contact information of the property owner or the management company; and a sign prohibiting loitering about the High Risk Facility.
- It is recommended that all staff and residents be required to sign an acknowledgement of the search conditions, conditions of the CUP, no alcohol or illegal drugs policy, and a clause indicating that any violation will result in immediate eviction proceedings.

Should you have any questions regarding this matter, please contact Commander Matt Blake, Assistant to the Director, Office of Operations, at (213) 486-0110.

Very truly yours,

CHARLIE BECK  
Chief of Police

A handwritten signature in blue ink, appearing to read "Earl C. Paysinger".

EARL C. PAYSINGER, Assistant Chief  
Director, Office of Operations