

Venice Stakeholders Association

January 1, 2009

Councilman Eric Garcetti
President, Los Angeles City Council

Councilwoman Wendy Gruel
Chair, Transportation Committee

Councilman Herb Wesson
Chair, Housing, Community and Economic Development Committee

Councilman Ed Reyes
Chair, Planning and Land Use Committee

City Hall
200 North Spring Street
Los Angeles, CA 90012

Re: Rosendahl Motion to Amend Municipal Code Section 85.02 to Allow Persons to Live in Vehicles Parked on City Streets, Parking Lots and Beach Lots.

Dear Councilmembers:

We are writing to express our serious concern regarding the above-referenced motion recently introduced by Councilman Rosendahl to allow persons to live in vehicles on City streets, parking lots and beach lots.

While we believe that any Los Angeles resident forced by circumstances to live in a vehicle deserves City (and County) assistance to secure affordable housing and other assistance, opening up un-controlled urban RV parks, similar to the failed experiment in Ontario, CA, or legalizing living in vehicles on City streets as contemplated in this motion are not appropriate solutions.

We are writing to ask that you to return the enclosed motion to its author for reconsideration and re-drafting to address the concerns we raise below.

As drafted, the motion is seriously flawed:

1. There is no requirement in the motion that the "designated overnight parking areas" be distributed evenly over a council district and certainly no requirement that they be distributed Citywide. There are an estimated 150 RVs/vehicles in which people reside in Venice and many more Citywide. They could all end up on lots (or streets) in Venice, which in turn would attract even more vehicle dwellers as occurred in Ontario. Venice already has an historical dearth of parking and bears the brunt of the ill effects of these urban campers: sewage dumped to the street and ultimately the ocean, loss of resident parking, noise, trash, drug sales from RVs, etc. This is not acceptable.

2. No conditions are set on how many nights a vehicle dweller(s) can park overnight in one

of the lots under the proposal, so this would become warehousing of RV/vehicle dwellers, not a transition program. We would support a transition program, with a set time limit, designed with monitoring and a service component, which assists indigent and under-employed RV occupants move to affordable housing.

3. There is no condition set requiring proof of legal disposal of human waste at a proper waste disposal facility. Further, there is no provision for where these RV/vehicles will go during the day when they must leave the parking lots to accommodate day-time users. Having them return to residential streets during the day continues to burden neighborhoods with loss of parking, unsafe waste disposal, trash, and crime.
4. Under the motion, no economic means test is required, so any RV owner, including those now paying to camp at the County lot at Dockweiler or at Leo Carillo State Park, etc., could use the lot(s) designated by Mr. Rosendahl for free. A means test - to be administered either by a non-profit program operator or the LA. Housing Department - must be a component of the motion.
5. A survey of the needs of RV dwellers Citywide needs to be completed before going ahead with any element of the motion:
 - a. It appears to us that some RV dwellers are simply travelers who are looking to avoid paying \$30 a night at, for example, the County facility at Dockweiler. The City possibly should be considering the establishment of a lower cost RV park, similar to the County facility, on the airport property on Vista del Mar across the street from Dockweiler, at a lower cost per night - say \$10 a night - and longer stays - say one month instead of the two weeks at Dockweiler. Then the police and DOT could start diverting this segment of the RV population to the lower cost lot.
 - b. RV transition program operators in Eugene, OR and Santa Barbara, CA have found that some RV dwellers are "assistance resistant" and want the freedom of living on the street. The City should determine the number of RV dwellers that would participate in a transition-to-housing program before setting up such a program and designating lots for this use.
6. There is no requirement that the staffing, security and social services for the vehicle dwellers be available before any lots are opened for overnight use. The development and funding of such transition services must pre-date the opening of any lots for overnight use (unless they are paid lots as suggested in #5a above).
7. Any lots designated under the motion should be under a non-fee conditional use permit application through the Planning Department and Planning Commission, and the City (or council office) should be required to go through such a process before any lots are designated. Similarly, there is no provision to establish "quality of life" controls on the behavior of the parking lot users to protect residential and commercial neighbors - and others camping at the same lot. The conditional use process should allow conditions to be imposed to address noise, trash, sewage disposal, provision of toilet and showers, etc., and for the use to be rescinded if the conditions are not met.
8. The designation of overnight RV sites is inherently a land-use decision. The Rosendahl motion must also be referred to the City's Planning and Land-Use Committee for consideration and to the City Planning Department and Planning Commission for comment. However, in its present form, it would be better if it is withdrawn and re-written to address the issues raised above.

Programs enacted in Eugene, OR, and Santa Barbara, CA, have been cited as examples of municipalities “practicing . . . a balanced approach” to problems associated with RVs camping on city streets. Investigation of both programs shows that their programs are focused on establishing lots for vehicle dwellers while also enforcing and even expanding laws against vehicular residence on city streets because of health, safety, and nuisance concerns. As recently as December 16, 2008, the City Council of Santa Barbara initiated an ordinance (10.44.205) to restrict RV street parking on City streets. We ask the City Council to thoroughly investigate these two programs, which value the rights of residents to the quiet enjoyment of their homes, streets and neighborhoods, free from the nuisance of RV dwellers.

As stated, we agree with Councilman Rosendahl that the City needs to provide assistance to those forced to live in their vehicles. However, we do not believe that his motion is a useful starting point to reach that result.

Thank you for your consideration of our views on these matters.

Sincerely,

Venice Stakeholders

(name)

(address)

Enclosure: Rosendahl Motion

cc: Mayor Antonio Villaraigosa
Councilmember Bill Rosendahl
Other Members of the the Los Angeles City Council
Los Angeles City Neighborhood Councils

Venice Stakeholders Association, 453 Rialto Avenue, Venice, CA
90291

(name)

(address)