clerk CIS <clerk.cis@lacity.org>

Your Community Impact Statement Submittal - Council File Number: 20-1376-S4

1 message

LA City SNow <cityoflaprod@service-now.com> Sun, Jun 22, 2025 at 10:41 AM
Reply-To: LA City SNow <cityoflaprod@service-now.com>
To: kevin.rutkowski.slnc@gmail.com, Clerk.CIS@lacity.org

A Neighborhood Council Community Impact Statement (CIS) has been successfully submitted to your Commission or City Council. We provided information below about CISs and attached a copy of the CIS.

We encourage you to reach out to the Community Impact Statement Filer to acknowledge receipt and if this Community Impact Statement will be scheduled at a future meeting. Neighborhood Council board members are volunteers and it would be helpful if they received confirmation that you received their CIS.

The CIS process was enable by the to Los Angeles Administrative Code §Section 22.819. It provides that, "a Neighborhood Council may take a formal position on a matter by way of a Community Impact Statement (CIS) or written resolution." NCs representatives also testify before City Boards and Commissions on the item related to their CIS. If the Neighborhood Council chooses to do so, the Neighborhood Council representative must provide the Commission with a copy of the CIS or rResolution sufficiently in advance for review, possible inclusion on the agenda, and posting on the Commission's website.Any information you can provide related to your agenda setting schedule is helpful to share with the NC.

If the CIS or resolution pertains to a matter *listed on the Commission's agenda*, during the time the matter is heard, the designated Neighborhood Council representative should be given an opportunity to present the Neighborhood Council's formal position. We encourage becoming familiar with the City Councils rules on the subject. At the Chair's discretion, the Neighborhood Council representative may be asked to have a seat at the table (or equivalent for a virtual meeting) typically reserved for City staff and may provide the Neighborhood Council representative more time than allotted to members of the general public. They are also permitted up to five (5) minutes of time to address the legislative body. If the CIS or resolution pertains to a matter *not listed on the agenda*, the designated Neighborhood Council representative may speak during General Public Comments.

We share this information to assist you with the docketing neighborhood council items before your board/commission. If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at empowerla@lacity.org.

******** This is an automated response, please DO NOT reply to this email. ********

Contact Information
Neighborhood Council: Silver Lake
Name: Kevin Rutkowski
Email: Kevin.rutkowski.slnc@gmail.com
The Board approved this CIS by a vote of: Yea(9) Nay(2) Abstain(0) Ineligible(0) Recusal(0)
Date of NC Board Action: 06/04/2025
Type of NC Board Action: Against

Impact Information
Date: 06/22/2025
Update to a Previous Input: No
Directed To: City Council and Committees
Council File Number: 20-1376-S4
City Planning Number:
Agenda Date:
Item Number:
Summary: The Silver Lake Neighborhood Council (SLNC) opposes the 41.18 policy in place and urges its repeal. We oppose efforts to criminalize our unhoused neighbors and reiterate our past opposition. Full CIS attached

Serving the Silver Lake Community Since 2003

P.O. Box 26385
Los Angeles, California 90026

Phone: (323) 413-SLNC (7562)
Email: board@silverlakenc.org
Web: silverlakenc.org

Co-Chairs: David Omenn
Joy Taira
Vice Chair: Cindy Coan
Treasurer: Maebe A. Girl
Secretary: Kevin Rutkowski

- COMMUNITY IMPACT STATEMENT -

Council File: 20-1376-S4
Position: AGAINST

Summary: The Silver Lake Neighborhood Council (SLNC) opposes the 41.18 policy in place and urges its repeal. We oppose efforts to criminalize our unhoused neighbors and reiterate our past opposition.

In particular, we also oppose expansion of 41.18, including a proposed blanket ban on sleeping in parked vehicles near specified uses across the City. Such contextless, callous bans contribute to the criminalization of homelessness and represent poor transportation policy.

In Los Angeles, around 19,000 people (in 2020) with nowhere else to turn use vehicles as shelter.[1] According to UCLA research, the most significant factor predicting vehicular homelessness (as opposed to homelessness elsewhere) was having children in the household—five times more predictive than any other factor.[2] These desperate kids and families are who such a ban would punish. Subjecting them to citations and towing drives these Angelenos further into poverty, in turn making it more difficult for them to be housed.

Our city is facing a homelessness crisis, one which city leaders will readily admit that we do not yet have the resources to address. Available beds and social services lag far behind the number of people who need them. Too many of those who are placed into interim housing are unable to transition to permanent options that are in short supply.

Yet 41.18 and this proposed expansion criminalize people with no other place to go, for merely seeking shelter within a wide radius of hundreds and hundreds of locations. It does nothing to solve homelessness, merely forcibly pushing people from place to place. It wastes millions of city dollars while accomplishing very little. Legal scholars have argued that these ordinances constitute cruel and unusual punishment and violate basic human rights.

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[1] Giamarino, C., Brozen, M., and Blumenberg, E. (2023, January 2). Planning for and Against Vehicular Homelessness. Journal of the American Planning Association, 89(1), 80–92. https://doi.org/10.1080/01944363.2022.2050936.

[2] Giamarino, C., Blumenberg, E., and Brozen, M. (2022, September 15). Who Lives in Vehicles and Why?: Understanding Vehicular Homelessness in Los Angeles. Housing Policy Debate. https://doi.org/10.1080/10511482.2022.2117990.

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We particularly oppose this motion because of the over 17,000 estimated unhoused LAUSD students and their families. If this motion passes and these families in vehicles are forced away from schools, many children will no longer be able to attend their school, progress through the educational system, and receive meals and other programs at school. Instead of using education to help young people in homelessness, 41.18 and any expansion of it deprive them of that right.

Of course, there are places where large and/or rarely moved vehicles create a safety risk to street users, and the City should take appropriate action to reduce such danger. However, the proposed 41.18 expansion fails to do that. It is not a coherent, citywide policy on the types and widths of streets with parking restrictions. Instead, it makes a spurious connection between certain land uses and people who are out of the way, sleeping inside vehicles and not in those land uses. Ill effects cited, such as dumping of refuse or vandalism, are already illegal under other laws. We also note that the general restriction on any vehicle parking for over 72 hours remains on the books.

In a 2018 memo, LADOT rightly identified many flaws in the current system of regulating vehicular homelessness, calling it a “piecemeal approach [that] creates a large backlog” and incurs “significant cost to the City for manufacturing and posting the signs.” Current practice merely pushes unhoused people around: “Once oversize parking restrictions are posted, oversize vehicles often move a few blocks away or to another street.”

If 41.18 worked, there would not have been a 12 percent increase in homelessness since its enactment. SLNC urges a wholesale rethinking of City homelessness policy and a new approach founded on services, housing, and listening to the needs of the unhoused.