

Communication from Public

Name: Ktown for All

Date Submitted: 06/17/2024 08:42 PM

Council File No: 21-0329-S5

Comments for Public Posting: Dear Councilmembers: The long-awaited 41.18 report was finally released on a Friday afternoon for a reason, because the results are BAD. Over 1,000 arrests, nearly 2 million dollars on signage (some of which is now outdated), and only 2 people permanently housed. The CLA's office estimates that implementing 41.18 has cost the city at least \$3 million, excluding the costs of LAPD and other city departments. This persistent refusal of LAPD to allow for any oversight into their activities is part of a pattern, enabled by this Council's lack of political will to hold the department accountable for overspending and abuses of police power. The incompleteness of this CLA report only underscores that failure. What little information is provided in the report is damning: nearly a million dollars went to Ilium Associates, a design consultant which, according to its own website, has a "national reputation as an innovative problem solver." Another million was spent on 6 bureaucrats to manage the whole process. This is \$2 million that could have gone to housing and services, and was instead spent on signs telling unhoused people to banish themselves. The impact on the ground is even worse. The ordinance resulted in 1,065 misdemeanors and 2,118 infraction citations. These citations pose a serious cost to people who are already extremely vulnerable. Even a minor citation can result in bench warrants and arrests if someone fails to appear in court, a result that is all the more likely when you have no mailing address at which to receive notices. This report gives lie to promises made by the Council when passing the most recent iteration of the law. Councilmembers made a show of attaching a "street engagement strategy" to the law. Despite this, the report pretends this was never part of the plan, claiming that services were never part of the goal of 41.18, but that it is only "an anti-encampment law . . . which provided essential services . . . in the course of encampment removal." Street engagement and street enforcement are at cross-purposes, and Council was unable to thread that needle. As a result, the ordinance is failing to achieve its stated goals on both encampment clearance and providing services. The results show the utter failure of street engagement attached to 41.18. LAHSA made contact with just over 1800 people. Of those, 313 people were placed in "interim housing" (meaning shelter), and 2 people were placed into permanent housing.

Among shelter placements, less than half were still sheltered in November 2023. The half-baked street engagement strategy did not actually require a “concrete placement” into housing. There was no requirement that a shelter bed be actually available before the police cite people for violating the law, or clear an area and tell people they can’t come back. LAHSA itself called the procedures created for street engagement “mostly ineffective” in housing homeless individuals. Compared to programs with dedicated housing resources, 41.18 was a failure— placement rates were no higher than in any other housing engagement LAHSA conducts. Service providers, people with lived experience of homelessness, and community organizations are universally negative about the law, noting that enforcement is confusing, unfair, and politicized, as can be seen by the concentration of citations. This law places additional burdens on a population that is already struggling. After waiting a year for this report, it confirms what we already know: laws that criminalize homelessness do significant harm to unhoused people, and do nothing to house people. As a community organization working with unhoused people in our neighborhood, we have seen first-hand the harm that policies of criminalization and banishment cause to unhoused Angelenos and to the wider community. The Council must take the results of the report seriously, and admit that it is time to reverse course and move beyond unrealistic policies based in the false belief that we can arrest our way out of homelessness. The only solution to homelessness is housing. We can’t cite and arrest our way out of this problem. Instead of wasting millions on signs telling people where they can’t be, on bureaucrats with no background in homelessness services we need to end this failed experiment. There is no fixing a racist law that allows for politicized results and significant harm to an already-marginalized population. We don’t need inaccurate signs, departments that refuse accountability, and bureaucrats. We need to invest in truly affordable housing, effective services, and enforcement of tenant protections. Sincerely, Ktown for All

Communication from Public

Name: Becky Dennison, Venice Community Housing
Date Submitted: 06/17/2024 09:59 AM
Council File No: 21-0329-S5
Comments for Public Posting: Please see attached letter from Venice Community Housing opposing LAMC 41.18 and supporting the demand for a public hearing with community experts.



Venice Community Housing

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Tel: (310) 399-4100 Fax: (310) 399-1130
www.vchcorp.org

June 17, 2024

Los Angeles City Councilmembers
200 N. Spring Street
Los Angeles, CA 90012

Dear Councilmembers,

Venice Community Housing, a supportive and affordable housing provider in Venice and throughout LA's westside, has long been opposed to LA Municipal Code 41.18 as it has been overwhelmingly ineffective in reducing homelessness and is devastating to unhoused people targeted or criminalized by it. Additionally, it does not achieve the goals of its supporters, as most all neighborhoods across the City have seen the number of people living on our streets and sidewalks steadily climb throughout the decades of 41.18 enforcement.

Recently, the City finally released its report back on the "cost and efficacy" of LAMC 41.18 implementation and how to improve the policy. While the report is deficient in key ways, such as lack of data from the Los Angeles Police Department, it does show key failings of the policy and is substantive enough to warrant more attention from the City Council, including but not limited to a public hearing with key community experts. Though a motion has been introduced focused on reforms, we believe that repeal of the law must be considered given the policy's ongoing failures and its outdated and racist purpose.

Venice Community Housing engages in mutual aid as often as possible, and works in coalition with many organizations leading the efforts on a care first approach to unhoused residents. Our collective communities urge you to repeal LAMC 41.18 and stop wasting scarce resources on this inefficient and cruel mechanism. We also support the demand from grassroots organizations and organizations led by directly impacted people that you invite unhoused community members and others who have been impacted firsthand by these cruel policies before the entire City Council.

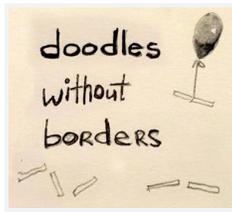
Sincerely,

Becky Dennison
Co-Executive Directors

Erika Lee

Communication from Public

Name: Doodles Without Borders
Date Submitted: 06/17/2024 03:10 PM
Council File No: 21-0329-S5
Comments for Public Posting: See attachment



June 17, 2024

RE: 41.18 Reportback and the urgent need for an independent hearing

Dear Los Angeles City Council President Paul Krekorian and Councilmembers:

As a community group that does a lot of our work in Skid Row neighborhood, and therefore regularly connects with unhoused folks, we are appalled by LAMC 41.18 . The recent extremely belated release of the reportback regarding 41.18's current iteration and subsequent motion to "improve" it are examples of City Council's extreme deprioritization of examining this law adequately, and therefore disregard for human life, when those lives are of constituents that are poor, unhoused, Black and Brown, and/or otherwise marginalized.

We align with Los Angeles Community Action Network's (LA CAN) demand for a comprehensive independent hearing, as a format the city can use to examine this law publicly and adequately. There is ample evidence and history that shows that this anti-Black, anti-poor, anti-working class law should be abolished, and you have the ability to do that without a hearing. If you lack the resolve to strike 41.18 out of LA municipal code outright, **an independent hearing as outlined by human rights and collective responsibility rooted organizations like LA CAN is the absolute least you can do.**

Sincerely,

Doodles without Borders participants

Doodles without Borders

www.doodleswithoutborders.com

Email: doodleswithoutborders@gmail.com

Communication from Public

Name: Jane Demian

Date Submitted: 06/17/2024 03:57 PM

Council File No: 21-0329-S5

Comments for Public Posting: LA City/County agencies tasked with providing housing and services to unhoused individuals should appear before the LA City Council and report back on the findings of the CLA's May 31, 2024 report. The Street Engagement Strategy that accompanied the LAMC 41.18 proposal in 2021 directed service providers to outreach to unhoused individuals to connect them with actual housing and services before LAMC 41.18 could be enforced at certain locations. Instead during the past three years that LAMC 41.18 has been in effect individuals have been moved from location to location under threat of citation and arrest. Some 41.18 locations have been repopulated because not enough interim housing is available, and so individuals have returned to the site of their previous encampment. During the "enforcement" process utilizing CARE and CARE+ cleanups, unhoused individuals are directed to move, their possessions are "swept" and discarded including medications, IDs, birth certificates, EBT cards, blankets and warm clothing. Moving individuals from location to location prevents case managers, outreach teams, mental health and medical service providers from locating individuals to provide continuity of care. The emphasis should not be sweeping these individuals from view where they end up a few blocks away, still unhoused. The emphasis should be on providing actual housing and services. There is a glaring scarcity of interim housing which results in many of these individuals remaining on the street waiting for placement. Inside Safe relocated hundreds of individuals into hotels and motels but that is only a temporary fix. Community members want to feel safe and would like sidewalks, parks, schools and libraries cleared of encampments. In order to accomplish that goal with compassion unsheltered individuals should not be subjected to harsh enforcement measures due to a scarcity of interim housing. More interim and permanent supportive housing needs to be provided along with homelessness prevention. Individuals who experience ongoing trauma, PTSD, mental illness and general lack of trust of the shelter system would benefit from LA County Dept of Mental Health and LA County Dept of Health services' outreach teams visiting individuals in encampments and tying those visits to offers of actual housing where mental health and medical services may be offered. I support accountability and transparency in connection

with LAMC 41.18 and strongly suggest that providing housing, medical and mental health care be a top priority.

Communication from Public

Name: LA Street Care & Mutual Aid
Date Submitted: 06/17/2024 09:47 AM
Council File No: 21-0329-S5
Comments for Public Posting: Please post this public comment to the council file.



To Los Angeles City Council:

The 41.18 report proves what we have known since its implementation: the ordinance is cruel, destructive, a drain on resources, and ineffective by every measure. The year-long delay of the report's release and the CLA's biased analysis cannot hide what a monumental failure 41.18 has been. Defending this toxic ordinance will have devastating impacts on your political future.

Just two people received housing as a result of outreach related to 41.18. We understand this isn't a housing ordinance. However, LAHSA and its affiliate organizations spent a considerable amount of time and resources engaging 1,856 people at encampments targeted by 41.18 over three years, pulling those overburdened caseworkers away from other clients in need. Then your banishment operations made it nearly impossible for those caseworkers to locate their clients when housing or services did become available. Your constituents wonder why the homelessness crisis worsens each year, and this .1% housing rate—the direct result of your mandate—presents a clear explanation. You are the crisis.

Your ordinance targets people with criminalization for being poor, then fails to provide them with anywhere to go. The report states that 94% of those engaged by caseworkers requested shelter or housing, but just 14% received any shelter. How can you claim the purpose of this ordinance isn't criminalization when it led to ten times more arrests than opportunities for shelter? No wonder 81% of targeted encampments repopulated.

The number of 41.18 arrests more than doubled from 2022 to 2023 with 41.18 infractions increasing 331%. Despite this drastic increase, the CLA disingenuously claims that a 30% decrease in misdemeanors is evidence of a reduction in the severity of 41.18 violations, betraying a shameless bias in this report's analysis. This also fails to recognize how police use 41.18 to stop and harass unhoused people, leading to many arrests that aren't directly attributable to 41.18 in the data that LAPD provided.

75% of arrests occurred in just three divisions: Devonshire, West LA, and Rampart. The areas these divisions cover are home to drastically different unsheltered populations (e.g., Devonshire among the lowest; Rampart among the highest). This proves that enforcement of 41.18 is extremely inconsistent across the city.

Without evidence, the CLA's analysis in the report claims 41.18 is responsible for 2022's 3.9% drop in violent crimes committed against unhoused people. However, this is a significantly smaller decrease than 2022's city-wide 12% drop in violent crime reported by the LAPD in 2022. This double-digit discrepancy compared to larger trends suggests 41.18 was actually ineffective in ensuring the safety of encampment residents compared to the general population in 2022.

As you know, the LAPD targets unhoused people with violence at much higher rates. This rise in arrests also disproportionately targets Black people because 41.18 is a racist, anti-Black ordinance. According to [data](#) from the Controller's website, 22% of 41.18 arrests have targeted Black people in 2024 even though just 8.7% of LA's total population is Black.

The CLA who compiled the report presents the cost of 41.18 as \$3 million with a note that this figure "represents a minimum estimate because multiple departments, including LAPD, were unable to disaggregate their labor costs associated with 41.18-specific expenditures from their departmental expenditures." We know the CLA deliberately hid costs specific to LAPD overtime associated with 41.18 because the CLA's knowledge of this information is [public record](#). The public record request, which the CLA is CCed on, revealed the LAPD [took \\$17 million from the A Bridge Home fund](#)—and to be clear, that means they took money from a shelter program—to pay for LAPD overtime for 41.18 enforcement during 2022 and 2023.

We know that this \$20 million is just the tip of the spear because the LAPD, LASAN, and other departments did not itemize costs related to 41.18. That \$20 million alone could have paid for a year's rent on more than a thousand **market-rate** studio apartments in the City of Los Angeles.

City Council and the LAPD like to pretend that increasing criminalization is meant to increase ADA accessibility. If this city cared about disabled people, they would focus on our miles of un navigable sidewalks, crosswalks, many traffic hazards, and the 36% of people experiencing "chronic homelessness" who are disabled. We can guarantee that every sweep that you've scheduled targeting an encampment with a disabled person living there fails to meet the requirements of the ADA.

We demand the release of all department reports that informed the 41.18 report. We demand that Council President Krekorian schedule an independent City Council hearing with each department reporting on its findings and that invites community groups to present their independent findings. Criminalizing people for being poor is disgraceful, a waste of money, and only worsens the humanitarian crisis that LA City Council has perpetuated. City Council must repeal 41.18, put a moratorium on evictions, establish a living wage, and invest in real services/community-led housing solutions.

LA Street Care & Mutual Aid