

Communication from Public

Name: MAR VISTA VOICE

Date Submitted: 08/04/2026 12:19 AM

Council File No: 26-4118-S7

Comments for Public Posting: Please post the attached PDF as public comment. CD11 has uploaded a last-minute “Findings” document to CF 26-4118-S7S in response to concerns that the resolution lacks the specific documentation and findings required by LAMC § 41.18(c)(4). As explained in the attachment, the new document does not cure those defects. It underscores them.



August 2, 2026

Los Angeles City Councilmembers

Via email and submission to City Clerk filing portal

Note: The following two letters are submitted together because the evidentiary record for CF 26-4118-S7 changed after the first letter was written. The first letter explains why the resolution, as introduced, failed to comply with LAMC § 41.18(c)(4), including the absence of the required specific documentation. After community members raised those concerns, Councilmember Park uploaded a last-minute "Findings" document in an apparent effort to cure the deficiency. The second letter responds to that new submission and explains why it does not cure the resolution's legal and factual defects.

Re: Traci Park's Motion Violates LAMC 41.18(c)(4)

Los Angeles City Councilmembers:

We urge you to oppose Council File 26-4118-S7, a resolution designating seven locations in Council District 11 as LAMC 41.18(c)(4) enforcement zones, scheduled for a vote on August 4. This resolution does not comply with the plain text of the ordinance it invokes, and adopting it as written would exceed the Council's authority under its own Municipal Code.

The statutory standard:

LAMC 41.18(c)(4) does not give the Council unlimited discretion to designate any location it chooses. It imposes specific, mandatory prerequisites:

"In order to designate a section of street, sidewalk, or other public right-of-way as prohibited under this subdivision, the City Council shall determine, in a designating resolution and based on specific documentation, that the circumstances of continued sitting, sleeping, lying, storing personal property, or otherwise obstructing the public right-of-way at that location poses a particular and ongoing threat to public health or safety."

The ordinance then enumerates the kind of circumstances that can support that finding: death or serious bodily injury at the location due to a hazardous condition; repeated serious or violent crimes, including human trafficking, at the location; or fires that resulted in an LAFD response at the location. The word "shall" establishes a mandatory duty, and the two-part test it creates is conjunctive: (1) a finding of a "particular and ongoing threat" (2) that is "based on specific documentation." A resolution that fails either part does not satisfy 41.18(c)(4), regardless of how it is captioned.

How CF 26-4118-S7 fails this test:

1. No documentation is in the record. The resolution states that CD11 "has submitted / posted to the File relevant documentation" showing a particular and ongoing threat. No such documentation is attached to the resolution, summarized in it, or otherwise identified in the public Council File. A bare assertion that documentation exists somewhere is not documentation. The ordinance requires the finding to be "based on" specific documentation, meaning the documentation has to actually support the finding on the record, not simply be referenced as existing.
2. The finding recited does not match the statutory standard. The resolution finds that "sleeping or lodging within the stated proximity to the designated area(s) is unhealthy, unsafe, or incompatible with safe passage." That is not the standard the ordinance sets. 41.18(c)(4) requires a finding of a "particular and ongoing threat to public health or safety," evidenced by things like a death, a pattern of violent crime, or fire department responses. "Incompatible with safe passage" describes ordinary sidewalk obstruction, the kind of generic inconvenience present on any block with an encampment. If that language were sufficient, it would satisfy the ordinance for literally every sidewalk in the city, which would collapse the municipal code's own limiting language ("particular," "specific," enumerated categories) into surplusage. Courts do not read ordinances to render their own qualifying language meaningless, and the Council should not adopt a resolution that does exactly that.
3. The resolution fails the "particular" and "at that location" requirements by batching seven unrelated sites under one generic label. LAMC 41.18(c)(4) requires the threat determination to be made "at that location," singular. This resolution groups seven addresses spanning three distinct neighborhoods (Westchester/LAX-adjacent Sepulveda and La Tijera corridor; Rose Ave and Hampton Dr in Venice; Wilshire Blvd near West LA) under a single undifferentiated "Public Safety" designation with identical boilerplate findings. Nothing in the resolution distinguishes what specific, documented incident occurred at 8925 S Sepulveda Blvd from what occurred at 720 Rose Ave. Treating seven geographically and factually distinct locations as fungible is inconsistent with a law that requires an individualized, location-specific finding for each designation.
4. The consequence of non-compliance is not merely procedural. Under 41.18(d), no person may be found in violation of a posted zone unless the Council has first "taken action, by resolution" consistent with the requirements of subsection (c). A resolution that does not satisfy (c)(4)'s documentation and particularity requirements cannot lawfully trigger enforcement under (d), regardless of whether it is adopted. Passing a resolution that does not meet the ordinance's own prerequisites does not just risk criticism, it risks adopting a designation that has no legal effect and that exposes the City to challenge.

Request:

We ask the Council to decline to adopt CF 26-4118-S7 on Tuesday and instead require CD11 to place the specific, location-by-location documentation required by 41.18(c)(4) into the public record for each of the seven proposed sites, so that the Council's finding, and the public's opportunity to evaluate it, can actually satisfy the code the Council is relying on.

Sincerely,

Mar Vista Voice

August 3, 2026

Los Angeles City Councilmembers

Via email and submission to City Clerk filing portal

Re: CF 26-4118-S7: Park's Last-Minute Submission Confirms Resolution Is Noncompliant

Los Angeles City Councilmembers:

Councilmember Park has now uploaded a last-minute “Findings” document to CF 26-4118-S7, apparently in response to concerns that the resolution lacks the specific documentation and findings required by LAMC § 41.18(c)(4). The new document does not cure those defects. Instead, it underscores them.

The submission claims to summarize LAPD and LAFD “statistics and data,” but contains no statistics or data. It provides no dates, incident numbers, records, counts, descriptions, or other documentation supporting its boilerplate references to “numerous emergency incidents” and “encampment fires.” Nearly identical language is repeated for all seven locations without establishing the particular and ongoing threat required at each one.

Community members who regularly observe these locations and conduct outreach to unhoused neighbors also dispute the submission’s basic factual claims.

At 204 Hampton, outreach volunteers report that no one has been maintaining an encampment on the designated side of the street. People have sometimes stayed across the street, but packed up their belongings every morning. St. Joseph Center security has reportedly prevented anyone from setting up a tent on the designated side and had the sidewalk power-washed daily.

Outreach volunteers likewise report that there has not been an encampment at 720 Rose Avenue. An encampment previously existed across the street, outside the Whole Foods parking lot, but it was cleared in 2024 and has not returned. Recent reporting by L.A. Material corroborates that account: Whole Foods hired Ghost Town Consultants in early 2024, and Ghost Town participated in preventing residents from returning following a March 2024 City cleanup. When the reporter recently visited, there were no tents around the Whole Foods perimeter.

This is directly at odds with the submission’s claim that “numerous individuals have consistently maintained an encampment at 720 Rose Ave” for the past year. The reporting places the former encampment across the street, documents its clearance before Councilmember Park’s stated May 2025 to May 2026 data period even began, and reports that the area remained clear during a recent visit.



If the submission's basic claims are this inconsistent with readily observable conditions at the first locations community members have examined, Council cannot reasonably accept its remaining assertions on faith. The document provides no underlying records with which to verify any of them. These factual contradictions undermine the credibility of the entire submission and demonstrate exactly why § 41.18(c)(4) requires specific documentation rather than boilerplate representations from a council office.

The submission also applies the wrong legal standard. It repeatedly claims that sleeping "within 500 feet" of each address is "unsafe, unhealthy, or incompatible with safe passage." That language and geographic framework come from subsection (c)(2), which governs overpasses, bridges, washes, railways, and similar infrastructure. This resolution invokes subsection (c)(4), which does not authorize a 500-foot exclusion zone. It requires Council to designate a particular section of street, sidewalk, or other public right-of-way based on specific documentation of a particular and ongoing threat. Neither the resolution nor the new submission identifies the section of public right-of-way being designated.

The timing is also telling. This last-minute submission is itself an acknowledgment that § 41.18(c)(4) requires documentation in the council file. A review of the City's other (c)(4) council files shows that they were similarly adopted without the required supporting evidence. Although this submission still does not meet the ordinance's "specific documentation" standard, its filing confirms the broader defect: the City has been adopting (c)(4) designations without satisfying a mandatory prerequisite imposed by the law. Those prior designations are therefore invalid, and Council should not add another invalid resolution to the list.

Please vote no on CF 26-4118-S7 and request a review of all existing § 41.18(c)(4) designations for compliance with the ordinance.

Thank you,

Mar Vista Voice

Communication from Public

Name: Carie Martin

Date Submitted: 08/04/2026 08:32 AM

Council File No: 26-4118-S7

Comments for Public Posting: I oppose CF 26-4118-S7. Traci Park's last-minute "Findings" document does not cure the resolution's defects. It provides no actual LAPD or LAFD data, contains basic factual claims disputed by community outreach volunteers, and relies on a 500-foot exclusion zone that § 41.18(c)(4) does not authorize. Please vote no and review all existing (c)(4) designations for compliance with the ordinance.