



October 10, 2016

Council File 16-0245

Honorable City Council  
c/o Office of the City Clerk  
Los Angeles City Hall  
200 North Spring Street, Room 395  
Los Angeles, CA 90012

Dear Honorable Members,

The Downtown Los Angeles Neighborhood Council requests that the following Community Impact Statement be added to Council File 16-0245, regarding the Council's effort to mitigate the impact on filming in Downtown Los Angeles caused by construction and development projects.

The Downtown Los Angeles Neighborhood Council ("DLANC") is opposed to the City Council's attempt to evaluate the impact to filming that may be caused by construction and development in Downtown, unless City Council also explicitly analyzes the effects that filming has on Downtown residents, businesses and community members, including how to better enforce filming permits.

As a starting point, DLANC greatly appreciates the positive benefits the filming industry brings to its Downtown stakeholders. Film production generates jobs and revenue for Downtown—and the regular appearance of Downtown LA on our screens, big and small, undoubtedly adds to the intangible allure of our burgeoning community. At the same time, DLANC has serious reservations about the one-sided perspective inherent in the opening Motion and, presumably, the resulting report. The Motion drastically underestimates the importance of construction and development projects to the growth of Downtown, while simultaneously assuming the filming industry imposes no burdens on residents, businesses and community members in Downtown. While DLANC agrees in theory that the City should study and report on the effects that construction and development projects have on filming Downtown, DLANC strongly believes that study will be necessarily incomplete if it does not explicitly consider the inverse effects of the film industry on Downtown. In addition—given the numerous and consistent complaints raised by stakeholders over permit enforcement issues—DLANC believes this would be a perfect opportunity to evaluate the issue of filming permit enforcement Downtown.

First, DLANC opposes any study that would ultimately result in halting, slowing, or somehow impeding development of housing stock when this City is in dire and desperate need for housing.<sup>1</sup>

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<sup>1</sup> <http://lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf>

This would be an especially problematic outcome if the sole purpose for impairing the growth of housing stock was to protect the filming industry. As we are all well aware, Los Angeles is in the midst of a housing crisis.<sup>2</sup> As such, development of much-needed housing should be this City's highest priority. Indeed, Los Angeles is the least affordable area of the Nation's 381 metropolitan areas.<sup>3</sup> Any study conducted by the City pursuant to this Motion and Council File should give explicit consideration to the effect protection of the filming industry might have on the growth of housing stock in the City generally and Downtown specifically.

Second, Downtown business and residents already shoulder a disproportionate share of the burdens caused by filming. Again, DLANC understands that filming brings tangible and intangible benefits to Downtown, but the industry also causes its share of problems, especially when production crews fail to adhere to their permit requirements. As DLANC has previously represented to the City Council,<sup>4</sup> our stakeholders regularly encounter film crews that inconvenience stakeholders by improperly exceeding the scope of what is properly permitted. Based on our communications with stakeholders, recent examples of such conduct include:

- Illegally closing sidewalks without a permit;
- Using off duty/retired police officers to intimidate stakeholders;
- Illegally preventing access to dwellings that are not within the scope of an issued permit;
- Violating generator placement guidelines, thereby resulting in exhaust fumes entering dwellings;
- Illegally placing "No Parking" signs for parking spots without abiding by the 24-hour notice requirement (*e.g.*, placing "No Parking" signs only two hours before designated time);
- Violating light intrusion guidelines (*e.g.*, bright lights and action scenes going until 4 AM);
- Sexually harass residents and in one instance, the production company failed to assist in submission of a report by refusing to identify the assailant;
- Treating residents with disrespect (*e.g.*, yelling at residents).

No matter how important the filming industry is to the City, its importance should function as an invitation for permit violations that substantially impair the quality of life of Downtown stakeholders.

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<sup>2</sup> <http://www.latimes.com/business/realstate/la-fi-unaffordable-homes-20140821-story.html>

<sup>3</sup> "Los Angeles is the least affordable rental market in the country, according to Harvard University's Joint Center for Housing Studies, and it's been ranked the second-least affordable region for middle-class people seeking to buy a home . . . Housing prices in Los Angeles have grown four times faster than incomes since 2000. Not only is Los Angeles the least affordable of the nation's 381 metropolitan areas, as the Harvard study showed, but half of all households in the region are considered 'cost burdened,' meaning that families spend at least 30% of their income on rent or mortgage payments. One in four households spends at least half its income on housing. And it's not just poor families that are struggling. Roughly half of middle-income households were rent burdened in 2011, compared with just 11% in 2000, according to a UCLA analysis. One in three households earning \$50,000 to \$75,000 spend more than a third of their income on rent." <http://www.latimes.com/opinion/editorials/la-ed-affordable-housing-part-1-20150111-story.html>

<sup>4</sup> [http://clkrep.lacity.org/onlinedocs/2014/14-0471\\_cis\\_9-9-14.pdf](http://clkrep.lacity.org/onlinedocs/2014/14-0471_cis_9-9-14.pdf)

Finally, DLANC would also like to inform City Council that it intends to reach out in good faith to FilmL.A., Inc. and other interested parties to negotiate resolution of the issues identified in this letter, especially permit enforcement. To that end, DLANC would be happy to collaborate with the City and FilmL.A., Inc. during the preparation of the report contemplated by this Motion.

This Community Impact Statement is based on the action taken at the special Board of Directors meeting on October 10, 2016, when the Downtown Los Angeles Neighborhood Council adopted the following motion and directed that a Community Impact Statement be filed reflecting its position.

**Motion: “The Government Liaison Committee recommends that the Downtown Los Angeles Neighborhood Council submit a Community Impact Statement opposing Council File 16-0245 unless the “report on the impact that various construction/development projects have on filming in the Downtown Los Angeles area” explicitly includes consideration of: (a) impacts that filming has on construction/development projects in the Downtown Los Angeles area; and (b) methods to enhance enforcement of permits issued for filming in the Downtown Los Angeles area.”**

Sincerely,

Patricia Berman  
DLANC President

Sincerely,

Nate Johnson  
DLANC Government Liaison Committee Chair