

## EXHIBIT A

### 4.2. Altadena Filming Committee Annual Update

Altadena Filming Committee  
End of Year Report, June 2017

#### Executive Summary

The Altadena Filming Committee, a Committee of the Altadena Town Council, reports on its activities over the past year. The Committee's main goals have been to understand the sentiment of Altadena's residents toward location filming in their neighborhoods and to gather information about the county policies for film permit approval and enforcement. The Committee has found that there is general support for filming, but many residents have complaints about some aspects of film shoots. The Committee has talked with representatives from County agencies to determine what their policies were. In the course of these talks, the Committee came to understand the filming permitting process, and also what the permissions and restrictions in a typical filming permit are. The Committee finds that a common complaint is that permit conditions are often violated by film crews. One permit condition in particular is routinely violated. Another complaint, one that affects neighbors in a very serious and negative way, is overuse of some locations. The Committee identified a couple of root causes of the situations that lead to complaints. The first cause is a lack of accountability for enforcement of permit conditions. The Committee believes that enforcement of permit conditions by FilmL.A. and law enforcement personnel is made difficult by the lack of sufficient tools to enforce permits. Furthermore, it appears that law enforcement personnel working on film shoots do not have a clear understanding of what their duties are. The second fundamental issue responsible for complaints is a lack of transparency on the part of FilmL.A.

In this report, the Committee makes recommendations directed toward resolving many of the complaints that have been heard. The recommendations are aimed at improving enforcement of (and therefore compliance with) permit conditions, improving transparency of FilmL.A. with regard to some permitting decisions, reducing the impact of extended film shoots (extended in hours or days), improving safety, and improving FilmL.A.'s relationship with the community of Altadena.

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## **A. Introduction**

The Altadena Filming Committee was appointed by the Altadena Town Council (ATC) in response to complaints that were coming in to the 5th District Supervisor's office regarding location filming in Altadena. The complaints involved too frequent use of some homes for location shoots, and Special Conditions that had been established 20 years earlier had ceased to be observed by FilmL.A. Moreover, as the neighbors learned about filming permits and permit conditions, they realized that permit conditions were being violated and that there was no enforcement of the permit conditions.

The Supervisor's Field Deputy, Sussy Nemer, suggested that a Committee be appointed to determine whether such complaints were widespread in Altadena. The Chair of the Town Council at the time, Diane Marcussen, appointed the Altadena Filming Committee. The Committee consists of three members who also sit on the Town Council: Anne Chomyn, Jennifer Lee, and Patricia Sutherlen, and community member Kenneth Meyer.

The Committee set as its mission to survey the residents of Altadena on their feelings about filming, and at the same time to help the residents understand more about the film permitting process. The Committee's mission also included the aim to try to resolve the community's concerns.

The Committee undertook a series of consultative meetings with representatives of the agencies that are involved in the filming permitting process, enforcement of permit conditions, and also with professionals who work in filming industries. The purpose of these meetings was to ascertain current policies of FilmL.A., the Los Angeles County Sheriff's Department (LASD), the California Highway Patrol (CHP), and the Department of Public Works (DPW). The Committee also held a meeting with film professionals that included two location managers (one retired, one active), two directors, and a location scout/agent to understand the industry's perspective on interactions with the community and with the aforementioned agencies.

At the same time, the Committee conducted an all out effort to obtain feedback from the community, using email, Facebook, NextDoor, altadenafilming.org, a local non-profit's newsletter, and announcements at Town Council meetings. The Committee set up and publicized an email account, altadenafilmingCommittee@gmail.com, so that community members could reach them directly. The account serves as an archive of community email responses. In addition, the Committee held a Town Hall on Filming, with a panel of decision makers who could answer questions and address concerns.

Lastly, as the Committee worked with County services to resolve the problems reported by residents, the Committee learned a great deal about how the County approves and enforces filming permits.

## **B. Achievements**

As a result of the consultative meetings with County agencies, the Committee succeeded in meeting its goals of ascertaining policies related to location filming in Altadena. This information was shared with the community by posting meeting minutes with detailed notes of these consultative meetings online on the Altadena Town Council website, [altadenatowncouncil.org/committees](http://altadenatowncouncil.org/committees). These minutes are freely accessible to the public. See Section C.13 in this document for dates of meetings and direct links to these documents. Furthermore, the Committee pointed to these postings at ATC meetings, on NextDoor.com, in newsletters, and on the [altadenafilming.org](http://altadenafilming.org) website to help make the community aware of this information. (The lack of an Altadena newspaper or a reliable news service or the ability to send out a mailing has restricted distribution of the information largely to residents who have access to the internet.)

A description of the County's policies and procedures gathered during the consultative meetings is presented in Section C. Policies and procedures governing film permit approval and enforcement.

The Committee succeeded also in capturing feedback from over 100 residents by email. A further 35 residents responded to posts on NextDoor.com and Facebook. More than 100 residents attended a Town Hall on Filming in Altadena. The feedback included positive and negative comments, as well as solicitation for help in dealing with immediate issues arising from film shoots. A summary of feedback received is presented in Section D. Results of surveying the community.

The Committee responded to complaints about ongoing filming activities in most cases by either talking to a FilmL.A. representative about the complaint or forwarding messages containing a description of the complaint to FilmL.A. and/or the DPW. Generally, the Committee received a response from FilmL.A. indicating what measures they had taken to resolve the problem. In one or two cases, the Committee contacted a law enforcement representative.

The Committee was helpful in having a policy established by the DPW to restrict parking at film shoot locations on New York Dr. between Lake Ave. and Sinaloa Dr. to one side of the street only. This policy will relieve traffic congestion at film shoot locations on that part of New York Dr.

## **C. Policies and procedures governing film permit approval and enforcement**

The Committee began its work by seeking out a description of the policies and procedures that govern the approval and enforcement of filming permits. However, neither the County nor any of the County Services that participate in the approval or enforcement of filming permits provide publicly available documentation of these policies and

procedures. In order to obtain accurate information about these policies and procedures, the Committee conducted a series of consultative meetings with authorized representatives from FilmL.A., the Department of Public Works, the LA County Sheriff's depart and the California Highway Patrol.

These meetings proved very informative. The Committee was able capture many details about the handling of filming permits in Los Angeles County. The findings were captured in meeting notes. In order to ensure accuracy, the meeting notes were presented to the representatives of the County services for review. Corrected versions of the meeting minutes are posted to the Altadena Town Council web site and are publicly available.

The following section provides an aggregation of the policies and procedures described by representatives of the County services and captured in the meeting notes of these consultative meetings.

*Approach to listing of policies and procedures:*

In an effort to provide an unambiguous and easily understood description of the County's policies and procedures used for the approval and enforcement of filming permits, the following policy statements have been cast as declarative statements of governance.

*Note on attribution:*

Each of the listed policies or procedures is attributed to a reference. These attributions appear in square brackets, '[ ]', and are formatted as follows: [*reference ID, page number, source*]. The *reference ID* refers to the number of document listed in the reference section at the end of this document. The *page number* refers to the page in the referenced document. The *source* reference to the authorized County Representative who provided the Committee with a statement of the policy or procedure. For example. [3,2,Smith] would attribute the policy to Reference 3, Page 2 by Smith. In cases where the County Representative is not identified in the referenced document, the attribution will appear with only a *reference ID* and *page number*. E.g. [3,2]

*Abbreviations:*

The following abbreviations will be used in the following section.

Los Angeles County Sheriff's Department	LASD
Los Angeles County Fire Department	LAFD
California Highway Patrol	CHP
Manual on Uniform Traffic Control Devices	MUTCD
Los Angeles County Department of Public Works	DPW

## C. 1 Filming permit requirement and entitlements

### Policies:

- All on-location film shoots in Los Angeles County shall require a filming permit. [3,5]
- A filming permit grants a filming company the authority to perform all activities that appear on the filming permit. For example, a filming permit may allow stopping traffic, illuminating a night scene, use of pyrotechnics or any other activity need to fulfill the needs of the project. [6,6]
- A filming permit grants a filming company the authority to use parkways. Parkway are a public right of way. [6,6], [6,8]
- FilmL.A. has the authority to change permitted filming conditions at any time in response to a “permit rider.” A “permit rider” is a filming company request for a change to an approved filming permit. [6,8]
- FilmL.A. shall subject “rider” applications to a complete review process. [6,8]

## C. 2 Filming Permit Application

### Policies:

- FilmL.A. is required to obtain the approvals from County Departments who have jurisdiction before the filming permit is granted. Department approval is required as follows:

LAFD	All filming permits
DPW	If permit requires use of roads where the Department has jurisdiction
LASD (see note below)	If permit requires use of areas under the jurisdiction of the Sheriff’s Department [2,3], [7,1,Waterman], [5,4], [6,11]

- DPW has the authority to add traffic and safety conditions to a filming permit.
- FilmL.A. shall require proof of insurance prior to approval of a film permit application. [2,3]
- A FilmL.A. production coordinator shall check the history of all locations listed on a permit application before the application is approved. [2,3]
- A FilmL.A. production coordinator shall check for the applicability of any Special Filming Conditions for every location listed on the permit application before the application is approved. [2,3]
- The FilmL.A. production coordinator shall inform the production company of all conditions required on the permit including Special Filming Conditions and restrictions on production hours. [2,3]

- A FilmL.A. production coordinator shall check the frequency of filming activity for each location listed on the permit application before the application is approved. [2,3]
- FilmL.A. shall 'red flag' filming companies that do not comply with permit conditions. Filming permit applications from 'red-flagged' companies will be subject to closer scrutiny. [2,3], [5,3]
- FilmL.A. has the authority to require that a FilmL.A. monitor be present at a film shoot conducted by a 'red-flagged' production company. [6,8]
- At the Town Hall meeting the FilmL.A. representative asserted that FilmL.A. does not have the authority to refuse a permit application using the location listed on the application as the basis of denial. [6,9]

Note:

- LASD approvals are conducted by the LASD Information Bureau's Film and Media Projects office.
- Neither the LASD nor CHP have a role in writing permit conditions.

C. 3 Hours of operation

Policy

- Each filming permit shall include a description of the allowed hours of operation for each permitted prep, shoot and strike day. [3,5]
- Production vehicles shall not arrive at the location prior to the permitted arrival times. Earlier arrival is a permit violation. [3,5]
- FilmL.A. has the authority to cancel a filming permit if a filming company arrives early and violates the permitted arrival time. [6,5]
- Production vehicles shall leave the location prior to the permitted departure time. Late departure is a permit violation. [3,5]
- All production equipment including portable restrooms and cables shall be removed from the site prior to the departure time of the last permitted production day. Leaving production equipment at the location after the last permitted production day is a permit violation. [3,5]

C. 4 Filming Permit enforcement

Policy

- FilmL.A. shall have the authority to revoke a filming permit and shut down a shoot. [6,7]
- LASD and CHP shall enforce permit conditions. (see notes below) [2,5]
- LASD and CHP shall have the authority to shut down a shoot for permit violations. [2,5]
- DPW shall inspect each permitted filming location to ensure compliance with all filming permit conditions including compliance with MUTCD conditions, cast-and-crew parking conditions plus any additional conditions. [3,5], [6.7]

- DPW inspectors shall have the authority to issue “notices of violation” for violations of filming permit conditions. [3,3]
- LASD and CHP shall have the authority to issue a citation to a vehicle parked in a posted No Parking zone. (see *notes* below) [5,2]
- LASD and CHP shall respond to issues or concerns about filming raised by a member of the community. [6,4]

#### Notes

- Since a filming permit violation is not a violation of the California Vehicle Code, neither LASD nor CHP have the authority to issue a citation to a vehicle for a violation of the filming permit’s ‘No cast or crew parking on area streets’ condition. [5,3]
- A law officer has the authority to ‘run the plates’ and identify a car that may be in violation of the filming permit’s ‘No cast or crew parking on area streets’ permit condition. [6,4]
- Neither LASD nor CHP have the authority to issue a citation for violation of arrival or departure times defined on the filming permit. [5,3]
- Neither LASD nor CHP have the authority to cite or restrain a neighbor who is disrupting a film shoot. However, law officers may, with the proper legal authority, take action for illegal behavior like disturbing the peace or trespassing. [5,4], [6,6]

#### C. 5 Inspection of filming permits

- A representative of the company conducting an on-location film shoot shall produce an approved filming permit on request from the public. [2,5], [3,4]
- FilmL.A. shall make approved filming permits publicly available online three days after the permitted strike date. [2,5]

#### C. 6 General traffic and safety

##### Policies:

- DPW approval of a film permit application shall require the condition that a law officer be on location during the film shoot. (see *ambiguities* below) [3,5]
- All filming permits shall include at standard set of traffic and safety conditions that ensure compliance with the MUTCD. [3,2]
- DPW requires that traffic control on a public thoroughfare be conducted by a trained specialist like a law officer or traffic control specialist. [3,2]
- DPW requires that driving or running scenes on public thoroughfare be overseen by a law officer. [3,2]

##### Ambiguities

- LASD and FilmL.A. assert that no law officer is required when the filming permit is for a shoot occurring entirely on private property. [5,4]



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C.7 Parking

C.7.1 Cast and crew parking

Policies:

- All permits shall include the following condition: “No cast or crew parking on area streets.” [1,1,Morelos]
- Cast and crew shall park personal cars either off-site in a parking lot or inside the location property. [1,1,Morelos]
- The parking of personal cast and crew cars shall not be allowed in areas posted for production vehicles. [3,4]
- Film company shuttles shall load and unload passengers only in the posted area permitted for production vehicles. Loading and unloading in a non-posted area is a permit violation. [3,4]

Notes

- DPW has the authority to post No Parking signs for production vehicles DPW does *not* post No Parking signs that would prohibit cast and crew parking. [6,4]

C.7.2 Production vehicle parking

Policies:

- A filming permit shall include a description of where film production vehicles are permitted to park. [1,1,Morelos]
- Permitted street parking for production vehicles shall be posted with no parking signs. . [1,1,Morelos]
- DPW shall post temporary No Parking signs in accordance with the Manual on Uniform Traffic Control Devices (MUTCD). [3,2]
- Only working production vehicles shall be allowed to park in the areas described on the permit. i.e. posted parking areas. [1,1,Morelos]
- A filming permit shall restrict production vehicle parking to one side of the street. (see exception below). [1,1,Morelos]
- A filming permit shall specify the particular side of the street on which parking of production vehicles is allowed. [3,4]
- DPW shall establish a policy that requires no parking on both sides of the street if the street of the locations requested for the filming is less than a minimum street width established by DPW. [3,2]
- DPW shall approve any exception to the policy prohibiting film production vehicles from parking on both sides of the street. If an exception is granted, vehicle parking must be staggered. i.e. vehicles must not be parked directly across the street from each other. [1,1,Morelos]

Exceptions:

- No Parking signs may be posted on both sides of the street if required to obtain a “clear picture.” [1,1,Morelos]
- No Parking signs may be posted on both sides of the street if required for safety reasons. For example, if the filming location is on a narrow street, a narrow-winding road, near a fire hydrant or red curbs. [1,1,Morelos]

C.7.3 Specific parking restrictions for Altadena

Policies:

- Filming permits for locations on New York Drive between Lake and Sinaloa shall require No Parking postings on both sides of New York Drive in the areas affected by production vehicles. [5,2], [6,12]

C. 8 Notification

Policy

- FilmL.A.’s Department of Field Services shall notify businesses and neighbors who will be affected by the shoot. FilmL.A.’s Department of Field Services shall place door hangers at affected businesses and neighbors’ homes. [2,3]
- FilmL.A. door hangers shall provide the following information on door hangers:
  - Name of film production company
  - Set up date(s)
  - Strike date(s)
  - Name of film being produced
  - Permitted street parking for film vehicles
  - Phone number for the film company representative
  - Phone number for FilmL.A.

*Note:* FilmL.A. door hangers may include only a portion of all the applicable conditions of the approved filming permit. [2,3], [6,13]

- FilmL.A. door hangers shall be distributed to all businesses and neighbors within 500 feet of the permitted filming location. (see) [2,4], [6, 13]
- FilmL.A. shall post door hangers 48 hours in advance of the first day of prep as defined on the approved filming permit. (see *exceptions*) [2,3]

Exceptions:

- If a shoot includes a high impact activity like gun fire or helicopters, the notification area may be expanded. [2,4]
- If notifications are distributed to affected businesses and neighbors before a filming permit is finalized and if the final permit includes conditions that were not included in the notification, no additional notification of affected businesses or neighbors is required.
- If a permit rider is approved by FilmL.A., no notification of affected businesses or neighbors is required. [6.8]

## C. 9 Neighborhood surveys

### Policy

- FilmL.A. may conduct a neighborhood survey if a filming permit application includes special circumstances like a long duration shoot, late night production, special effects (like a helicopter or pyrotechnics) or another activity that might cause a hardship on businesses or neighbors. [2,4], [6,9]
- The radius of the neighborhood survey area shall be determined by a subjective assessment by FilmL.A.. [6,10]
- The neighborhood survey shall be conducted no later than 3 days before the first prep day at the permitted location. [2,4]
- The sole purpose of the survey is to determine if a business or neighbor has a special need that should be accommodated by the film company. [2,4]
- FilmL.A. is not obligated to obtain the permission of a business or neighbor prior to approving a permit. [2,4].

### Notes

- If a survey reflects a business or neighbor concern, FilmL.A. will work with the production company to make adjustments. [6,9]
- FilmL.A. evaluates neighborhood surveys based on submitted comments. FilmL.A. does not use objective criteria. (e.g. required percentage of approving neighbors.) [6,10]

## C. 10 Community Liaisons

### Policy

- FilmL.A. shall have the authority to assign a FilmL.A. Monitor and/or a representative of law enforcement to act as liaisons or mediators between the film company and the public. [2,4], [6,13]
- FilmL.A. shall have the authority to decide if a FilmL.A. Monitor is required for the approval of a filming permit. [2,4]
- If a FilmL.A. Monitor is required, FilmL.A. shall add the cost of the Monitor to the filming permit fee. [2,4]

## C. 11 Assignment and duties of Law Enforcement Officers

### Policy

- LASD and CHP officers assigned to a film shoot shall be responsive to needs of both the production company and the community. [5,3]
- If law enforcement officers are required by a filming permit, they shall be assigned from the Los Angeles County Sheriff's Department (LASD) or the California Highway Patrol (CHP). [3,4]
- The duties of an on-location law enforcement officers shall include: [5,2]
  - Ensuring public safety

- Enforcing permit conditions
- Traffic control
- Assistance in the parking of large vehicles
- Stopping traffic as needed for the film production

### C. 12 Miscellaneous

- FilmL.A. shall provide a service to answer questions and address problems 24 hours per day, 7 days per week. [2,4]
- FilmL.A. shall collect and maintain complaints for 8 years. Complaints shall be linked to a permit number. [6,10]
- FilmL.A.'s Community Relations Department shall work out mitigations of long term filming problems. [6,10]

#### Notes:

- FilmL.A. meets regularly with the trade unions and law enforcement to address complaints and develop remedies.

### C. 13 References

- [1] Morelos, J., FilmL.A.'s Parking Policy. Email communication. Fall 2016. <http://altadenatowncouncil.org/wp-content/uploads/2016/12/FilmL.A.%E2%80%99s-Parking-Policy.pdf>
- [2] Consultative Meeting with FilmL.A. and others. June 14, 2016. <http://altadenatowncouncil.org/wp-content/uploads/2016/08/20160615AFCMinutesr2.pdf>
- [3] Consultative Meeting with Representatives of Department of Public Works. September 28, 2016. <http://altadenatowncouncil.org/wp-content/uploads/2016/12/SeptemberAFCMinutes.pdf>
- [4] Consultative meeting with Film Professionals. December 29, 2016. <http://altadenatowncouncil.org/wp-content/uploads/2017/03/FilmPros-12-29-16d.pdf>
- [5] Consultative Meeting with Los Angeles County Law Enforcement. February 8, 2017. [http://altadenatowncouncil.org/wp-content/uploads/2017/04/film-8Feb-law\\_officer\\_meeting\\_FinalR.pdf](http://altadenatowncouncil.org/wp-content/uploads/2017/04/film-8Feb-law_officer_meeting_FinalR.pdf)
- [6] Town Hall on Filming in Altadena. February 28, 2017. [http://altadenatowncouncil.org/wp-content/uploads/2017/05/Town\\_Hall\\_Meeting\\_28Feb2017\\_Detailed\\_Notes-1.pdf](http://altadenatowncouncil.org/wp-content/uploads/2017/05/Town_Hall_Meeting_28Feb2017_Detailed_Notes-1.pdf)
- [7] Waterman, W., "Contact at LASD film permit approval office." Feb. 14, 2017 email. <https://drive.google.com/file/d/0B-n9-WNKlgZcaGRpUEZ2di1oRIU/view?usp=sharing>.



## D. Results of surveying the community

### D.1. The numbers

The Committee sent out a request to the community for input and received well over 100 email responses. The Committee also received input from community members who reported problems with recent filming in the area. Eleven residents responded to Committee posts on NextDoor.com and 27 participated in a discussion on filming that arose on a group Facebook page.

Over 90% of the written comments and emails were in favor of filming in the community. A number of respondents were film location hosts and were strongly in support of location filming. Several written comments expressed a fear that the Committee was going to shut down filming or hamstring the industry in Altadena. Most of the 90% in favor who gave a reason for their support saw location filming to be of economic benefit to their neighbors or themselves and to the community. **Many** respondents who supported filming because of economic benefit believed that fees went to the County general fund and would come back to Altadena. (Few if any realized that the fees collected went exclusively to FilmL.A. and DPW.) About one-fourth of the supportive responses were conditional, e.g. “as long as adequate notice is given,” or “as long as neighbors are treated with consideration.” There were many suggestions for how to make filming less intrusive in their neighborhoods. A few did not want any night filming at all. Rather few (about 7) were completely opposed to location filming in Altadena.

At the Town Hall, the great majority of the comments regarding filming were unfavorable or of a complaint nature. It was reported that those in attendance who supported filming felt intimidated and refrained from making comment.

### D.2. The complaints

A major category of complaints had to do with parking. The most frequent complaint has been that cast and crew park on the street and sometimes leave no parking spaces for residents. Furthermore, having cars and film equipment trucks parked on both sides of a street narrows the roadway so that sometimes two cars cannot pass one another and it creates a safety hazard for pedestrians. It should be noted that many respondents did not seem to be aware that it is a permit violation for cast and crew to park on area streets.

Other complaints heard by the Committee had to do with crew behavior and included trampling or sitting on parkways, destroying ground cover or other plants, loud talking or other noise in the middle of the night, bright lights shining into homes after dark or blinding drivers on major streets, rudeness and arrogance from crew members, early arrival of trucks into an off-site parking lot, crew leaving later than the permit specified, or leaving equipment or porta potties behind when the shoot had ended for the day. One person reported that production personnel conducting a pre-shoot survey misrepresented

and downplayed the actual extent of the intrusion of what turned out to be several all-night filming events during a two and one-half week-long production.

In the category of disruption of routine or daily activities, respondents cited interference with trash pickup and with construction or repair work. It was reported that a street was kept blocked for longer than the two minutes allowed and a resident could not pick up her child from school in time. Another resident had a concern about being able to get to a doctor's appointment in time. Neighbors have been awakened by filming trucks arriving at the off-site parking lot at 3 or 4 a.m., hours before the time indicated on the permit. One resident hosting a party to celebrate his birthday was told by a Deputy knocking on his door to turn down the music because of a film shoot across the street.

Several residents complained about noisy generators or generators positioned close enough to their homes that they were inhaling combustion fumes. One resident had combustion fumes in his house for the two days that the generators were kept in a nearby parking lot. Idling trucks have also been reported as a problem.

A frequently mentioned complaint in the email communications and at the Town Hall was that of overuse of certain locations and base camps. While most residents of Altadena are in support of filming in Altadena, and appreciate the contribution of the filming industry to the economy, some who live in areas with frequent shoots feel that location hosts are profiting at the expense of disrupting their neighbors' peace and enjoyment of their homes. The locations reported to have been overused included Homewood Drive, New York Drive between Lake and Sinaloa, Woodbury, Saint Elizabeth's Church, Upper Fair Oaks, and Alzada Rd.

Information on the frequency that a location has been used is not publicly available. If requested, FilmLA will provide frequency information, but in the past this information has proven to be inaccurate or misleading. According to County ordinance 22.56.1925, FilmL.A. should not approve permit requests that will result in a frequency of usage that would "overburden a neighborhood." However, FilmL.A. will not reveal what the criteria are for deciding when to put a pause on accepting permit applications for a particular location to avoid overuse.

Other complaints had to do with safety or obstructing traffic. Large film production vehicles parked near intersections obstructed view of fast moving cross traffic; vehicles parked near driveways made it hard to see to exit driveway safely; filming vehicles parked on both sides of a narrow street would have made it impossible for emergency vehicles to pass through, should they have been needed. Other situations that posed safety hazards included crews blocking the road for long periods of time; bright lights blinding drivers; non-code-compliant electric cables being run underwater; stairs from a truck pulled out into the sidewalk forcing pedestrians to walk on a busy street instead of on the sidewalk.

Several people complained about the lack of help from law officers assigned to the shoot. They perceived the officers as sitting in their cars all day, not helping people exit their driveways when they couldn't see oncoming traffic, not getting cast and crew to move their cars, not helping direct traffic. In one case a Sheriff's Deputy handcuffed a neighbor who had been complaining to "security" personnel at a shoot that had been running late into the night for several nights and playing loud music. In one case where a neighbor asked for Deputy's help, Deputy said that that wasn't his job, his job was to provide security to the shoot. In other cases, the officer on duty made clear that the residents were not his concern, his service was to the production company.

A complaint was directed at FilmL.A. regarding Special Conditions not being observed when permits were being issued. FilmL.A. had apologized and admitted to making a mistake. However, FilmL.A. has pointed out that Special Conditions are not binding, they are merely advisory.

At the Town Hall, many people expressed frustration with FilmL.A.'s handling of complaints, reporting that calling with a complaint did not result in remediation of the problem. They claimed that FilmL.A. was not holding production companies and their crews accountable and that FilmL.A. itself was not being held accountable. FilmL.A. Monitors were described by one person as ineffectual, by another as unresponsive. "There is no one to enforce the code" [permit conditions]. Comments from the Town Hall included the following: FilmL.A. is in the business of issuing permits – they are not in the business of enforcement or of having any accountability; it doesn't appear that anyone is in control of the shoot other than the people running the shoot; neither the Sheriff nor CHP seem to know what the permit allows; there needs to be accountability for FilmL.A. and for people working on shoots - otherwise, nothing will improve; no one is accountable on an overnight shoot; the survey is worthless; we filled out surveys dozens of times - nothing gets done; we don't mind occasion filming, but it happens 3 days a week in our neighborhood; children are kept awake by generators - we've repeatedly contacted FilmL.A. - they have done nothing to help. One commenter said it took hours for FilmL.A. to respond. Some problems need immediate attention, like a bad generator or a light.

### D.3. Feedback from Industry Professionals

The consultative meeting held with the filming professionals gave us an understanding of what they viewed their obligations to the community to be as well as their complaints, or their wishes for improvement in the practices of County agencies. One location manager said she would appreciate more help from law enforcement. If an officer did help after being asked, he would help for only a short duration. Two location managers reported that they would appreciate help with the parking and keeping crew members from parking on the street. It was not clear to several people on the panel what the law officers were supposed to do: officers were expensive to hire, generally not helpful, and compared poorly with the retired LAPD officers that are used on shoots in Los Angeles. Panel



members suggested that a job description be written out for the officers hired to be on a shoot.

It was agreed that it would be useful for production companies to know in advance the frequency that a proposed location has been used to avoid overuse. It was suggested that location hosts communicate with their neighbors before a shoot. Pasadena's policy of sending notification letters to neighbors in advance of a shoot is helpful. All the film professionals in attendance stressed that they understood the importance of maintaining good relations with the community.

## **E. Root causes of filming-related issues**

### **E.1. Lack of accountability**

The chief complaint that was heard at the Town Hall, and perhaps it is the root of all the other complaints, was that there was no accountability. Neither production companies nor FilmL.A. were being held accountable.

Actual enforcement of permit conditions occurs rarely. For example, every permit requires that the cast and crew park off-site in a rented parking lot or on private property. Yet, at most shoots, crew members park their cars on the streets near the shoot. The difficulty arises because the only available immediate enforcement mechanism is permit revocation, which is a remedy that is out of proportion to this and some other violations of permit conditions.

For a non-permit-compliant production company, no penalties or fines are imposed. FilmL.A. does not have the authority to deny future requests for a filming permit or impose a temporary moratorium so long as the filming company meets the burden of proof standards defined by County ordinance. FilmL.A. flags a company if they receive complaints from the community and may require that that company use a FilmL.A. Monitor the next time they apply for a permit. One problem with this approach is that sometimes, for a small or independent film, the company may have been formed for only that one production.

As FilmL.A. has been contracted to facilitate the permit application process in the interest of promoting filming in the County and preventing runaway filming, and since FilmL.A. is a 'no cost' County service, they have a strong incentive to provide as many filming permits as possible. While FilmL.A. states that its "job is to facilitate on-location filming in a way that minimizes inconvenience to communities," residents do not feel well served because they see repeated instances of overuse despite complaints from neighbors, failure to enforce permit conditions, and a complaint response system that is, at best, reliant on the cooperation of the production company, and at worst, completely ineffective.

Regarding enforcement there are two issues that need to be addressed: the first is that there are not enough tools for enforcing permit conditions. Currently the tools consist of revoking the permit and requiring a FilmL.A. Monitor on a future permit. The second issue is a lack of clarity as to who is responsible for permit enforcement. The Committee has been told that law enforcement personnel will take on permit enforcement. However, based on reports from the community and from film production personnel, the officers stationed at location sites do little or nothing to prevent cast and crew parking on area streets. Perhaps it is a question of whom the Deputies feel accountable to – the company that pays them or the community.

By comparison, the City of Pasadena’s Terms, Conditions, and Operational Guidelines clarify who the police officers are working for: “The responsibilities of the public safety personnel encompass the interest of the citizens of Pasadena as well as the Movie Company. These officers are employees of the City, not the Movie Company, and they will enforce all City regulations and the provisions of the film permit.”

The DPW has a permit enforcement role and deploys an inspector to filming sites to check compliance with traffic and safety conditions. However, the enforcement capability is severely limited. Inspection of conditions is cursory and not sustained. In addition, DPW notices of violation are ineffective because, unlike construction, filming is a short-term activity.

#### E.2. Lack of transparency

It is difficult for the public to get information from FilmL.A. on the actual frequency that a particular location or block has been used. Thus, neighbors’ reports of overuse of locations and neighborhoods cannot be verified. In addition, FilmL.A. does not make public the criteria for declaring when a pause needs to be imposed on permitting a certain location so as to avoid overuse.

In cases where a film company requests a permit for a shoot requiring extended production hours, gun fire, aircraft, or another activity likely to disrupt the neighborhood, FilmL.A. will require a neighborhood survey before the filming activity begins. Community members reported that the surveys appeared to be perfunctory and the results were never disclosed. The suggestion was made that the survey results be made available in order to understand the County filming permit approval process.

#### **F. Recommendations**

In light of residents’ complaints relating to accountability, lack of enforcement of permit conditions, and lack of transparency, the Committee makes the following recommendations:

Provide better enforcement tools for permit violations

The Committee suggests that penalties short of “shutting down a shoot” or revoking a permit be created. Such penalties may include fines or denial of permits (for a period of time). (As an example, The City of Pasadena will immediately impose a civil penalty of over \$900 for certain permit violations that fail to be corrected in a timely manner.)

The Committee recommends that in the case of violations of the “no cast and crew parking on area streets” condition, a fine be imposed on the production company for every cast and crew member found to be in violation.

The Committee recommends that all filming permits issued require an enforcement officer or a FilmL.A. Monitor to be present on location to see that permit conditions are complied with.

#### Duties of LASD Deputies and CHP Officers

The Committee recommends that, for off-duty law enforcement officers that are hired by film production companies per permit requirements, a complete job description be written. The job description should address whether or not the officer is expected to help direct traffic, whether the officer is expected to help neighbors exit driveways when their view is blocked by film production vehicles, whether the officer is expected to help park film vehicles, whether the officer is required to read the permit and enforce permit conditions. If the officer is required to enforce permit conditions, then he or she would be the same as the “enforcement officer.” The job description may also provide guidelines for sharing duties when private contractors hired for traffic control or security have been hired. The Committee recommends that the job description be made public.

#### Overuse and transparency

The Committee recommends that the appropriate County agency specify the threshold at which a neighborhood becomes a frequently filmed area. The Committee suggests that, in residential neighborhoods, six location days, including setup and break down, in a three-month period, in a one block long area be the threshold. Permit applications for filming in frequently filmed areas should come under extra scrutiny and receive more stringent conditions. FilmL.A. should have the authority to approve, conditionally approve, or deny permit applications in frequently filmed areas.

The Committee recommends that FilmL.A. develop a County-wide online database that makes it a simple matter for personnel to look up how often shoots have occurred at the requested location and on that block. Such a database should include filming events of the past three years, and be easy to update promptly with each permit issued. Such a database should be accessible to the public.

Once the limit on the number of shoots or locations days at one location in a three-month period has been reached, then any additional permit application should undergo a special review process, similar to the Procedure for extended time periods: Ordinance 22.56.1885.

The Committee recommends that FilmL.A. share, upon request, all the responses to pre-shoot surveys.

The Committee asks that the County CEO or Counsel determine whether a home used so frequently for filming so that its rental becomes the primary source of income should be defined as a business and whether it is legal to conduct such a business in a residential area.

The Committee recommends that the County CEO publish its annual evaluation of FilmL.A.'s performance.

#### Long term film shoots

The Committee recommends that permit applications for shoots having a duration of longer than six days in a three-month period at one location be treated in a different way from permit applications for short term shoots. The Committee recommends that County ordinance 22.56.1885 - Procedure for extended time periods - be referred to for permitting such long-term shoots.

#### Late night and all-night shoots

The Committee recommends that riders to allow filming conditions, such as late hours, that would normally trigger a survey not be issued. (A rider does not get neighbor feedback.)

#### FilmL.A. Community Relations

The Committee recommends that Film L.A. provide email permit notification for Altadena neighborhoods. A capability should be provided so that a community member who desires email notification can register online.

The Committee recommends that the County make public the process used to initiate and approve Special Filming Conditions that would govern film shoots in a neighborhood.

#### Safety

The Committee recommends that the DPW shall post No Parking signs on both sides of cul-de-sac streets, with the understanding that film vehicles may park on only one side.

The Committee recommends that FilmL.A. require that generators be placed as far as possible from non-host homes, and that their running time be minimized. The Committee recommends also that the idling of parked trucks be kept to a minimum.

## **G. Conclusion**

The Altadena Filming Committee has identified general support for location filming in Altadena. Film shoots become problematic when permit conditions are violated, when neighbors are not respected, and when too many shoots or shoot days occur in a neighborhood. The Recommendations made by the Committee have the aim of helping to resolve these issues, so as to improve the experience of location filming for the neighbors of location hosts and to maintain a film-friendly environment.

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