

Altadena Filming Committee Correspondence with Los Angeles County CEO
(July 2017 – July 2018)

Starting in July 2017, the LA County CEO and the Altadena Filming Committee exchanged emails regarding inputs to new filming ordinances being drafted by LA County Counsel. The exchange was prompted by recommendations that appeared in the [Altadena Filming Committee's 2017 Yearly report](#).

That correspondence appears below:



County of Los Angeles CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
<http://ceo.lacounty.gov>

SACHI A. HAMAI
Chief Executive Officer

July 5, 2017

Okorie Ezieme, Chairman
Altadena Town Council
730 E. Altadena Drive
Altadena, CA 91001

Dear Mr. Ezieme:

ALTADENA TOWN COUNCIL FILMING COMMITTEE REPORT AND RECOMMENDATIONS

Supervisor Kathryn Barger has requested that the Chief Executive Office (CEO) and FilmLA review and report back on the recommendations in your Filming Committee's report. In preparing this response, the CEO contacted County Counsel, the Sheriff, Public Works, and the California Highway Patrol (CHP).

Based on a May 2, 2017 Board motion, County Counsel is recommending amendments to the Los Angeles County Code which would ensure County departments have the necessary enforcement authority to address violations in the film permitting process by property owners and production companies. In drafting these amendments, the County will take into consideration the Altadena Town Council Filming Committee's recommendations.

Additional input is provided below:

- Generally, the CHP or the Sheriff are required for any filming in the Altadena area for safety and/or filming related activity, including parking.
- The following is considered when evaluating a permit:
 1. Location, duration and frequency of filming at the hosting property, including historical use;
 2. Location, duration and frequency of activity near the requested location, including parking areas;
 3. Proximity of concurrent filming activities and other activities such as street maintenance;
 4. Production company size, number of filming days requested and proposed activities, including parking; and
 5. Any other criteria that may be relevant to the specific situation.

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HILDA L. SOLIS
First District

MARK RIDLEY-THOMAS
Second District

SHEILA KUEHL
Third District

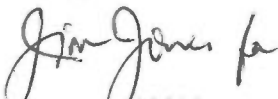
JANICE HAHN
Fourth District

KATHRYN BARGER
Fifth District

- FilmLA currently maintains notes regarding specific community issues, concerns or complaints related to such issues as generator placement and parking restrictions at specific locations.
- FilmLA has a review process in place for frequently used properties. Properties of concern are currently flagged in FilmLA's On-Line Permitting System (OPS) and requests to film at these locations require additional review and discussion with a FilmLA Operations Manager (OM). The OM will direct the FilmLA Coordinator to contact affected stakeholders to discuss the filming request, and determine next steps in addressing concerns or potential issues.
- The County requires that a Community Filming Survey be done for film permit requests that film more than five consecutive days in a row or outside of the normal filming hours. The radius to be surveyed is established by FilmLA based on the location, filming activity, and parking requirements. It is the responsibility of the Production Company to conduct the survey and return the responses back to FilmLA with enough time for FilmLA to evaluate the survey package and make permit adjustments as necessary. FilmLA can arrange review of Community Film Surveys at their office.
- Riders are issued for minor changes to a film permit. Riders are not used to authorize late night or all-night shoots.

If you have any questions, please feel free to contact Susana Graether at (213) 893-2086 or e-mail sgraether@ceo.lacounty.gov.

Sincerely,



SACHI A. HAMAI
Chief Executive Officer

SAH:JJ:DSB
DSP:acn

c: Supervisor Kathryn Barger, Fifth Supervisorial District
Mary C. Wickham, County Counsel
Paul Audley, President, FilmLA
Sheriff Jim McDonnell
Mark Pestrella, Director of Public Works
California Highway Patrol

To: Jim Jones, Chief Operating Officer (jones@ceo.lacounty.gov)

CC: Kathleen Barger <Kbarger@bos.lacounty.gov>
Sachi A. Hamai <shamai@ceo.lacounty.gov>
Mary Wickham <mwickham@counsel.lacounty.gov>
Jim McDonnell <webemail@lasd.org>
Mark Pestrella <mpestrella@dpw.lacounty.gov>
Kristi Cardoza <kcardoza@film.ca.gov>
Sussy Nemer <snemer@lacbos.org>
Gary Smith <gsmith@ceo.lacounty.gov>
Paul Audley <paudley@filmla.com>

Subject: CEO response to Altadena Filming Committee recommendations

Attached: CEO response

Dear Mr. Jones,

We wish to call your attention to a response you sent to the Altadena Town Council from the LA County CEO regarding amendments to the LA County Code. The amendments were requested by the County Supervisors on May 2, 2017 and were intended to ensure that the County Departments had sufficient authority to address filming permit violations.

On July 5, 2017, you sent a letter to the Altadena Town Council in response to recommendations that appeared in a report prepared by the Council's Filming Committee. Your letter informed the Council that the CEO had made 'additional inputs' to the Filming Committee's recommendations. Those inputs were made in consultation with industry representatives. However, the CEO's office had not consulted with the Council's Filming Committee.

The Filming Committee is concerned that these 'additional inputs' may suggest that the current practices for filming enforcement are sufficient to address the issues raised by members of the Altadena community. Our concerns are based on our findings from a year-long series of meetings with the community and representatives of the County Departments who participated in the film permitting process. During those meetings, the Filming Committee was able to piece together a detailed understanding of how filming permit approval and enforcement processes function in LA County.

Given this understanding, we are concerned about possible misinterpretations of the CEO's 'additional inputs.' These are our concerns:

- 1) The 'additional inputs' refer to several established methods and processes for evaluating and enforcing filming permits. However, in practice, the methods and processes are *ad hoc* and undocumented. We are concerned these undocumented methods and processes are inconsistently and unfairly applied and may be mistakenly perceived to be sufficient to address known permit violations.
- 2) The 'additional inputs' state that law officers are required for any filming. The presence of a law officer might suggest that the onsite officer is able to enforce permit conditions like restrictions on parking or crew arrival time. According to a representative from the LA Sheriff's Department, law officers do not have the legal authority to enforce permit conditions. We are concerned that the simple presence of law officer may be misunderstood to be a sufficient and effective means of enforcing permit conditions.
- 3) The 'additional inputs' identify a number of techniques, like neighborhood surveys, that are used to evaluate and approve a permit application. Community members have raised numerous concerns that these techniques are perfunctory and unresponsive. We are concerned that these techniques may be mistakenly perceived as effective methods for assessing the concerns of nearby residents and businesses.

We appreciate that any CEO recommendation will carry significant weight with the Board. With that in mind, we request that the authors of the CEO's 'additional inputs' confer with the Filming Committee to understand our concerns for the purpose of drafting a follow-up memo that captures those concerns.

We believe this would be a very constructive way of avoiding any misunderstandings that might inaccurately bias the authors of the proposed amendments.

We sincerely appreciate your consideration and interest in the concerns of Altadena.

Altadena Filming Committee.

Attachment: July 5, 2017 letter from Sachi Hamai, LA County CEO to Okorie Ezieme, Chair, Altadena Town Council

<https://drive.google.com/file/d/0BzduRAnBpvXIU19PLXfwWU1jRGM/view?usp=sharing>



Altadena Filming Committee <altadenafilmingcommittee@gmail.com>

CEO response to Altadena Filming Committee recommendations

Gary Smith <gsmith@ceo.lacounty.gov>

Fri, Jul 27, 2018 at 1:24 PM

To: Altadena Filming Committee <altadenafilmingcommittee@gmail.com>

Cc: Sussy Nemer <snemer@lacbos.org>, Paul Audley <paudley@filmLA.com>, "Perry, Chris" <CPerry@bos.lacounty.gov>, "hon.ezieme@cityofaltadena.us" <hon.ezieme@cityofaltadena.us>, Jim Jones <JJones@ceo.lacounty.gov>, Douglas Baron <DBaron@ceo.lacounty.gov>

Good Afternoon,

In response to your July 16th email, we wanted to provide some clarifications and update the Altadena Filming Committee on the County Film Permitting Ordinance revisions and current policies. We are still in the process of revising the County Ordinance which will be subject to a public comment process. We expect that a draft of the revision will be ready for public comment by early October 2018. The goal of the revisions is to clarify language as it relates to enforcement of permit conditions, criteria used to approve permits, and other areas of the Code that will strengthen the County's role in facilitating responsible filming. The impetus to revise the Ordinance came from a number of Unincorporated Areas (UA) including Altadena.

Relative to the "additional inputs" mentioned in the July 5, 2017 letter from our CEO Sachi Hamai, those inputs were provided for clarification on current procedures. They are not recommendations but rather part of the County's existing protocols.

Altadena Film Committee comments:

1. The 'additional inputs' refer to several established methods and processes for evaluating and enforcing filming permits. However, in practice, the methods and processes are *ad hoc* and undocumented. We are concerned these undocumented methods and processes are inconsistently and unfairly applied and may be mistakenly perceived to be sufficient to address known permit violations.

County Response: Steps One through Five from the July 5, 2017 CEO letter are applied to every permit application when it is submitted to our Permit Coordinator, FilmLA. FilmLA is authorized by the Board of Supervisors to assess all requested Film and Photography permit applications and its impact on the respective neighborhood. As in the case of Altadena, the County, in partnership with FilmLA, has created a number of special conditions for various areas of Altadena based on historical patterns of overuse and/or substantiated permit violations. Every complaint has been responded to in a timely and constructive manner. The County will continue as it has to prioritize filming issues in Altadena given the frequency of filming in the area.

2. The 'additional inputs' state that law officers are required for any filming. The presence of a law officer might suggest that the onsite officer is able to enforce permit conditions like restrictions on parking or crew arrival time. According to a representative from the LA Sheriff's Department, law officers do not have the legal authority to enforce permit conditions. We are concerned that the simple presence of law officer may be misunderstood to be a sufficient and effective means of enforcing permit conditions.

County Response: The July 5, 2017 CEO letter states that "Generally, the CHP or the Sheriff are required for any filming in Altadena for Safety and/or filming related activity, including parking". This does not mean that a Sheriff or CHP is required for ALL filming. Only in the case of a road closure or safety issue will law enforcement be required to be present. They currently do not have the authority to shut down a film or photo

shoot if the permit conditions are violated. As mentioned above, the Ordinance is being revised to clarify and strengthen enforcement language.

3. The 'additional inputs' identify a number of techniques, like neighborhood surveys, that are used to evaluate and approve a permit application. Community members have raised numerous concerns that these techniques are perfunctory and unresponsive. We are concerned that these techniques may be mistakenly perceived as effective methods for assessing the concerns of nearby residents and businesses.

County Response: Community surveys are required when a film or photo shoot intends to film outside of the standard 7:00am – 10:00pm timeframe or if the filming conditions might have detrimental impacts on the surrounding neighborhoods. FilmLA requires the respective Production companies to conduct said surveys and provide those back to them. Further, when a resident of Altadena has a complaint about a film shoot, FilmLA and our office has been timely in our responses and interventions.

Please feel free to contact me directly with any additional questions.

Sincerely,

Gary Smith

Gary Smith

Principal Analyst - CEO Entertainment Industry Liaison

Economic Development Division

Chief Executive Office - County of Los Angeles



Kenneth Hahn Hall of Administration

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Los Angeles / California 90012

☎ (213) 974-2504

www.lacounty.gov

From: Altadena Filming Committee [mailto:altadenafilmingcommittee@gmail.com]

Sent: Monday, July 16, 2018 9:36 AM

To: Jim Jones Chief Operating Officer <jones@ceo.lacounty.gov>

Cc: Kathleen Barger <Kbarger@bos.lacounty.gov>; Sachi Hamai <SHamai@ceo.lacounty.gov>; Mary Wickham <MWickham@counsel.lacounty.gov>; Jim McDonnell <webemail@lasd.org>; Mark Pestrella

8/8/2018

Gmail - CEO response to Altadena Filming Committee recommendations

<mpestrella@dpw.lacounty.gov>; Kristi Cardoza <kcardoza@film.ca.gov>; Sussy Nemer <snemer@lacbos.org>; Gary Smith <gsmith@ceo.lacounty.gov>; Paul Audley <paudley@filmla.com>; Altadena Filming committee <altadenafilmingcommittee@gmail.com>

Subject: CEO response to Altadena Filming Committee recommendations

Dear Mr. Jones,

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2 attachments



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CEO memo to ATC.PDF
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