

Communication from Public

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Comments for Public Posting: See attached letter.



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Los Angeles Planning and Land Use Management Committee
200 N Spring St Room 340
Los Angeles, CA 90012

RE: Better Neighbors Comment Letter – Agenda Item 15 (25-0029-S1) & 16 (14-1635-S10)

Dear Chair Blumenfield, Vice Chair Hutt, and Members of the Planning and Land Use Management Committee,

Better Neighbors LA (“BNLA”) is a coalition of tenants, housing advocates, and community members committed to protecting long-term housing by curbing illegal short-term rental (“STR”) activity. BNLA was founded following the passage of LA’s Home-Sharing Ordinance (“HSO”) with the goal of using research and data analysis to mitigate the STR industry’s impact on affordable housing and neighborhood stability. **BNLA opposes agenda item 15, which seeks to revive the Vacation Rental Ordinance (“VRO”). With respect to Item 16, we ask the Committee to direct the City Attorney to return with a comprehensive ordinance with all thirteen Council-approved amendments, including a strengthened Private Right of Action and the Electronic Verification System, so that enforcement reforms advance as a unified package.**

I. Item 15: The Vacation Rental Ordinance Would Deepen the Housing Crisis

Item 15 threatens to resurrect the Vacation Rental Ordinance, which was voted down in 2023 because of the devastating impact it would have on LA’s long-term residents, and the concerns remain unchanged. The proposal would authorize approximately 31,000 new STR permits, effectively eliminating the HSO’s primary residency requirement and prioritizing the profit of multi-property owners over tenants.

Research consistently shows that STR proliferation reduces long-term housing supply, raises rents,¹ increases displacement pressures, and will ultimately increase the scale of housing-related social services that the city will have to provide.

The alleged fiscal merits of the VRO are not supported by evidence. The Save Our Services Coalition claims that the VRO would generate \$100 million in new tax revenue,² but historical data compiled by BNLA contradicts this claim. In the 2019-2020 fiscal period prior to

¹ <https://onlinelibrary.wiley.com/doi/abs/10.1111/1540-6229.12440>; https://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

² <https://www.saveourservicesla.com/>

the HSO, roughly 34,000 STRs generated \$42.4 million in Transient Occupancy Tax (“TOT”) revenue. Today, roughly 9,000 STRs generate \$34.8 million in TOT. More STRs do not create more tourism demand; they simply cannibalize existing lodging markets.

If the city instead enforced the HSO and fined the more than 5,000 illegal STRs currently operating (instead of rewarding illegal operators by offering them legal sanction), it could generate nearly \$300 million a year,³ without sacrificing housing. Allowing the VRO to advance would mortgage the city’s housing future for an illusory short-term gain.

II. Item 16: The Committee Must Advance the Core Enforcement Reforms Already Approved by the Council

We had hoped that the core enforcement recommendations unanimously directed by City Council over a year ago would be on today’s agenda, but they are not. The draft ordinance before the Committee omits several essential components of the Council-approved enforcement framework, including:

- A revised Private Right of Action that aligns with Council’s clear direction.
- The Electronic Verification System requirement for platforms, which ensures that illegal listings never go live.
- Pre-permit inspections, which closes the loophole that allows illegal units to self-certify compliance.
- Adequate staffing and resources across DCP, LAHD, LADBS and the City Attorney’s Office.
- A unified enforcement structure that will reduce fragmentation and improve accountability.
- Updated fees to ensure full cost recovery, so that enforcement is sustainably funded.

These reforms work together to create a functional, modern enforcement system capable of addressing the scale of illegal STR activity in LA. Because Item 16 does not include these core elements, we ask that the committee direct the City Attorney to revise the Private Right of Action and return with the Electronic Verification System, along with the remaining Council-approved amendments, so that enforcement reforms move forward as a complete package.

BNLA urges the Planning and Land Use Management Committee to **Reject the Vacation Rental Ordinance (Item 15)** and, instead, enforce the HSO. This is the most effective and fiscally responsible way to preserve and restore long term housing, protect tenants, and ensure that Los Angeles remains a city where residents can afford to live. Should you have any questions, please contact Maura O’Neill at maura@betterneighborsla.org.

Sincerely,

/s/

Randy Renick

³ https://www.betterneighborsla.org/s/BNLA_Annual-Report_2022-web.pdf