

Communication from Public

Name: Rebecca Ayala

Date Submitted: 03/14/2025 04:13 PM

Council File No: 14-1635-S10

Comments for Public Posting: Dear President Harris-Dawson and Councilmembers of the Los Angeles City Council, Better Neighbors LA (“BNLA”) writes to you with recommendations regarding policy changes to the implementation of the Home-Sharing Ordinance (“HSO”). Better Neighbors LA is a coalition of tenants, housing activists, and community members working to curb illegal short-term rental (“STR”) activity with the intent to protect long-term housing. We conduct data analysis and research on the short-term rental industry and its impact on affordable housing. As the state’s homelessness crisis continues to worsen and residents rebuild following the devastating wildfires, it is vital that the City Council take the necessary precautions to enforce the HSO and protect housing stock in Los Angeles. BNLA encourages the Council to approve all the proposed changes to the HSO as recommended by the Housing and Homelessness Committee at the December 4, 2024 meeting, particularly the recommendations to amend the HSO to include a private right of action and electronic verification system. The HSO is only as strong as the enforcement that backs it. Illegal STR listings remove desperately needed housing from the market for long-term tenants. From February to November 2024, there were only 94 citations issued by the City. During that same period, Granicus reported an average of 5,745 noncompliant listings each month to the City, which means the City has enforced upon approximately less than 1% of noncompliant listings per month last year. Given the scale of noncompliance and lack of enforcement, BNLA recommends you approve all 13 recommendations made at the December 4, 2024 hearing, with special consideration to two key proposed amendments as outlined below:

- Recommendation #12: Private right of action for Home-Sharing violations, which is a motion that has been referred to the Planning and Land Use Management Committee (CF-14-1635-S12). As the City continues to struggle with enforcement, this amendment would allow interested parties to pursue legal action against STR operators and platforms that violate the HSO. Cities like Santa Monica, West Hollywood, and San Francisco have already adopted this enforcement mechanism.
- Recommendation #6: Electronic Verification System for platforms, which would include an affirmative verification approach that ensures platforms will check the legal status of a

listing before a booking is completed. New York City implemented this enforcement tool in 2023 through Local Law 18. Reports indicate that following the implementation of Local Law 18, listings on Airbnb dropped more than 80% compared to the period prior to when the law went into effect. The implementation of this system will place more of the onus on platforms, rather than the City, to ensure listings are compliant with the HSO. As hosts continue to advertise non-compliant listings and short-term rental platforms repeatedly violate the HSO, this Council needs to take a strong stance and make clear that the HSO will be enforced. In doing so, the Council will bring the City one step closer to protecting and preserving existing housing stock for long-time residents. We encourage the Council to take steps today to move forward with the 13 recommendations made in the Housing and Homelessness Committee that will improve enforcement of the HSO. These recommendations will increase the efficiency of the City's enforcement efforts and make evading the HSO more difficult, particularly for flagrant violators. Thank you for your time and consideration. Should you have any questions, please contact rebecca@betterneighborsla.org. Sincerely, /s/ Randy Renick



@better_LA
betterneighborsla.org

March 14, 2025

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 340
Los Angeles, CA 90012

Re: March 18, 2025 Agenda Item #28 (CF 14-1635-S10): Housing and Homelessness Committee Report relative to the Home-sharing vendor evaluation, process enhancements, compliance strategies, and staffing needs for home-sharing and residential hotels enforcement; and related matters – SUPPORT

Dear President Harris-Dawson and Councilmembers of the Los Angeles City Council,

Better Neighbors LA (“BNLA”) writes to you with recommendations regarding policy changes to the implementation of the Home-Sharing Ordinance (“HSO”). Better Neighbors LA is a coalition of tenants, housing activists, and community members working to curb illegal short-term rental (“STR”) activity with the intent to protect long-term housing.¹ We conduct data analysis and research on the short-term rental industry and its impact on affordable housing. As the state’s homelessness crisis continues to worsen and residents rebuild following the devastating wildfires, it is vital that the City Council take the necessary precautions to enforce the HSO and protect housing stock in Los Angeles. BNLA encourages the Council to approve all the proposed changes to the HSO as recommended by the Housing and Homelessness Committee at the December 4, 2024 meeting, particularly the recommendations to amend the HSO to include a private right of action and electronic verification system.²

The HSO is only as strong as the enforcement that backs it. Illegal STR listings remove desperately needed housing from the market for long-term tenants. From February to November 2024, there were only 94 citations issued by the City. During that same period, Granicus reported an average of 5,745 noncompliant listings each month to the City, which means the City has enforced upon approximately less than 1% of noncompliant listings per month last year.³

¹ <https://www.betterneighborsla.org/>

² https://clkrep.lacity.org/onlinedocs/2014/14-1635-S10_misc_HH_12-4-24.pdf

³ BNLA data on file from California Public Records Act Request to the City Planning Department.

Given the scale of noncompliance and lack of enforcement, BNLA recommends you **approve all 13 recommendations made at the December 4, 2024 hearing, with special consideration to two key proposed amendments** as outlined below:

- **Recommendation #12: Private right of action for Home-Sharing violations**, which is a motion that has been referred to the Planning and Land Use Management Committee (CF-14-1635-S12). As the City continues to struggle with enforcement, this amendment would allow interested parties to pursue legal action against STR operators and platforms that violate the HSO. Cities like Santa Monica, West Hollywood, and San Francisco have already adopted this enforcement mechanism.⁴
- **Recommendation #6: Electronic Verification System for platforms**, which would include an affirmative verification approach that ensures platforms will check the legal status of a listing before a booking is completed. New York City implemented this enforcement tool in 2023 through Local Law 18.⁵ Reports indicate that following the implementation of Local Law 18, listings on Airbnb dropped more than 80% compared to the period prior to when the law went into effect.⁶ The implementation of this system will place more of the onus on platforms, rather than the City, to ensure listings are compliant with the HSO.

As hosts continue to advertise non-compliant listings and short-term rental platforms repeatedly violate the HSO, this Council needs to take a strong stance and make clear that the HSO will be enforced. In doing so, the Council will bring the City one step closer to protecting and preserving existing housing stock for long-time residents. We encourage the Council to take steps today to move forward with the 13 recommendations made in the Housing and Homelessness Committee that will improve enforcement of the HSO. These recommendations will increase the efficiency of the City's enforcement efforts and make evading the HSO more difficult, particularly for flagrant violators. Thank you for your time and consideration. Should you have any questions, please contact rebecca@betterneighborsla.org.

Sincerely,

/s/

Randy Renick

⁴ City of Santa Monica: <https://ecode360.com/42735174> ; City of West Hollywood: <https://ecode360.com/43917308> ; City of San Francisco: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_admin/0-0-0-27937

⁵ <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCAadmin/0-0-0-137273>

⁶ <https://www.airdna.co/blog/nycs-short-term-rental-crackdown>