

Communication from Public

Name: Jodi Craft

Date Submitted: 12/01/2024 11:39 AM

Council File No: 14-1635-S10

Comments for Public Posting: The ability to have an Airbnb on my property allowed me to heal after being hit by a drunk driver and kept me off of public assistance during the recovery period. My family largely counts on our bookings to provide income to our household. We also are helping the local economy where our guests frequent many of the small businesses in the area. Getting rid of the extended permits is a hardship for any who have providing places for out of towners to stay and supporting their local community. Please do not do away with this as you will put many people in financial hardship unnecessarily.

Communication from Public

Name: Tami

Date Submitted: 12/02/2024 12:36 PM

Council File No: 14-1635-S10

Comments for Public Posting: I'm 65 years old and I rely heavily on my Airbnb short-term rental. Without my rental, I could be forced to sell my home. My home services my community. Grandparents stay at my home to visit their grandchildren as they can't afford the hotels because they are on a fixed incomes. I Rent to young college students with astronomical college debt, who can't afford to stay at a hotel when they're here, to explore our city. I recently had someone from the UK stay with me that said "if it wasn't for AirBNB, there's no way he could afford to come here." If it wasn't for AirBNB they may not come here at all. What I don't understand is Why aren't you focusing on the -commercial operators, -absentee owners, -speculators and -investors who have exploited home-sharing for their personal economic gain. I also understand that the hotel industry with their big pocketbooks are putting pressure to initiate more regulations for home sharing & it's not right. A lot of these hotels are headquartered overseas, or in other states For example -The Beverly Hills Hotel & -The hotel, Bel Air are owned by the Sultan of Brunei, Hassanal Bolkiah -Beverly Wilshire Beverly Hills is owned by a Hong Kong-based private equity firm. Lai Sun Group based in China. -Intercontinental hotel headquarters is based in the UK -The Peninsula Beverly Hills owned by Hongkong and Shanghai Hotels. -Viceroy L'Ermitage Beverly Hills was owned by Raffles Holdings; A Singapore based Hotel until they were indicted for money laundering. Now a New York base company owns them, EOS Investors LLC -Marriott corporation is based in Bethesda, MD -Cameo hotel -Embassy suites -Waldorf Astoria All owned by Hilton hotel based in McLean Virginia -Best western based in Phoenix, Arizona -Omni Hotels & Resorts based in Dallas, Texas. -Carlisle Inn based in Sarasota, Florida So I implore you to please allow me and other hosts to rent on Airbnb's for 365 day a year. Please don't force us to sell my home that I have lived in for the past 26 years. Thank you for your time. You're constituent Tami Smith

Communication from Public

Name: Ishka

Date Submitted: 12/02/2024 03:03 PM

Council File No: 14-1635-S10

Comments for Public Posting: I wish I could be there to lend my support but I have to work. I am struggling to support my family. I have more than one job. Airbnb has been a Godsend that's helped us keep afloat. Please keep allowing us to rent for extended periods. I don't know what we will do without it

Communication from Public

Name: Johnathan Walton

Date Submitted: 12/02/2024 05:49 PM

Council File No: 14-1635-S10

Comments for Public Posting: Every time the topic of banning short-term rentals in Los Angeles comes up, I feel an immense amount of stress. When my family isn't using my second unit at my home, I use Airbnb to supplement my mortgage. Leaving my home vacant would not be the best use of the property.

Communication from Public

Name:

Date Submitted: 12/02/2024 09:58 PM

Council File No: 14-1635-S10

Comments for Public Posting: Short-term rentals support the local economy, provide significant tax revenue for the city, and enable many residents to afford to stay in their homes. The extended homesharing permit is an important resource that gives Angelenos the flexibility of sharing their home when needed, especially for those who rely on home sharing to remain in the city

Communication from Public

Name: Cataleya
Date Submitted: 12/02/2024 11:32 PM
Council File No: 14-1635-S10
Comments for Public Posting: "Limiting Airbnb hosting in LA won't solve the homelessness crisis but will harm local families who depend on this income. Responsible hosting provides jobs and keeps local businesses thriving without impacting the housing market for those in need."

Communication from Public

Name: Ruth Steinberg

Date Submitted: 12/03/2024 10:41 AM

Council File No: 14-1635-S10

Comments for Public Posting: I have been denied a renewal AFTER having submitted my \$200 payment on the grounds of a name change in the application. I submitted proof of my married name and the home info through numerous documents. I was told to go down to the government office to file a name change form- which i will not do -since I cannot get to the office downtown LA just for this little number!!!! -I resumbitted more evidence and a new form and have yet to hear anything back -I am not just requesting a reimbursment- this is DAYLIGHT ROBBERY and I want my money RETURNED- This is my home and we only rent it out when holidays come by -it is making this an impossible choice- and I think the system is unmanagable for people like me who cannot go down to the office to reclaim - WHERE IS THE HUMAN VOICE TO THIS PROCESS???? STOP THIS PERMIT- IT IS MONEY GRABBING THEFT!

Communication from Public

Name: Eduardo A Braniff

Date Submitted: 12/03/2024 10:46 AM

Council File No: 14-1635-S10

Comments for Public Posting: Short-term rentals help keep LA's economy strong, provide tax revenue, and allow people to afford to stay in their homes and monetize an asset they've invested in. The Extended Homesharing Permit provides this flexibility. We cannot afford to lose it. Leaders must find a middle ground, not a binary solution, in which neighborhoods and affordable housing stock are protected, while responsible owners can use their homes as both residences and income generating properties. If this means a cap on number of rental days/requirement of primary resident days, fine. But the solution to the city's housing crisis should not rest on those who have not had a hand in it.

Communication from Public

Name: Christopher Paulsen

Date Submitted: 12/03/2024 10:50 AM

Council File No: 14-1635-S10

Comments for Public Posting: My husband and I own a house in Silver Lake. We moved there in 1998 when the house and neighborhood were run-down. We have fixed the house up, the neighborhood has gentrified around us, and we rent a guest room in our home. We live there 24/7, and have been hosting since 2017. Having the extended home-sharing permit is vital to us and the neighborhood. There are few motels in Silver Lake, and we are booked constantly (15-20 nights a month), bringing guests and tourists (and their money) to the neighborhood. My husband is currently looking for a job, and with my teacher's salary we are able to JUST get by, with the additional income from AirBnb. PLEASE, please, please keep the Extended Home Sharing Permit. We would not survive without it. Thank you!!

Communication from Public

Name: William Yoelin
Date Submitted: 12/03/2024 11:03 AM
Council File No: 14-1635-S10

Comments for Public Posting: I am a Los Angeles homeowner of 15 years, living and working out of my home in Silver Lake. We both work in the entertainment industry, which in the past two years had taken a significant hit; the work that was once readily available has either dried up or moved out of the state. The income from our single room AirBnB has been a lifesaver. The unit is in our home, and the amount we make every month renting this year has helped us to cover basic living costs. And we rely on the Extended Homesharing Permit so that we can provide our room to travelers year round. The unit is also a boost to the neighborhood economy. We provide a local guidebook for our guests, directing them to some of our favorite restaurants, shopping, coffee shops and places to sightsee while staying in LA and Silver Lake. The feedback from them has been invaluable. Travelers particularly appreciate like that our unit exists in our unique neighborhood that is sorely underserved by affordable hotel options. In the name of serving the people of Los Angeles (and not the hotel industry lobbyists), we strongly encourage the council to continue the Extended Homesharing Permit. Regards, William Yoelin 854 Kodak Drive Los Angeles 90026

Communication from Public

Name: Tyron Akal

Date Submitted: 12/03/2024 11:05 AM

Council File No: 14-1635-S10

Comments for Public Posting: As a property owner living in Los Angeles, having the option to let out our ADU for short term rentals is absolutely crucial for me and my family. It is inconvenient for us, but the financial implications of not doing so, would put us in a very bad position. That's why I implore you to please allow us to continue using the extended home share permit. Thank you.

Communication from Public

Name: Brendan Francis

Date Submitted: 12/03/2024 11:34 AM

Council File No: 14-1635-S10

Comments for Public Posting: Please do not repeal the extended home sharing permit. This allows me to afford the high cost of living and provide undermarket rent to LA citizens who are my tenant. This permit spurs economic growth for the owner of the houses as well as the immediate neighborhood. Repealing it wont help homelessness.

Communication from Public

Name: colin schleining

Date Submitted: 12/03/2024 12:19 PM

Council File No: 14-1635-S10

Comments for Public Posting: "Data Shows No Evidence Linking Short-Term Rental Restrictions to Reduced Homelessness or Improved Affordability"
I am a retired person doing all I can to make ends meet and stay in my home. My sole income comes from renting my home on Airbnb and helping a retired neighbor do the same. I also employ a local Hispanic mother as a cleaner, supporting our community. Eliminating the extended home share permit would directly threaten my ability to afford my home. I follow all rules, hold a valid permit, have no violations, and contribute to the millions of dollars in transient occupancy taxes the City collects annually. Yet, this proposal unfairly targets those like me who rely on home sharing to survive and avoid homelessness. The idea of eliminating the extended home sharing permit raises serious unanswered questions: • Will it reduce homelessness in Los Angeles? • Will it impact housing affordability? • How much revenue will the City lose in transient occupancy taxes? • What City services will be cut to offset this loss? A move to eliminate the Extended Home Sharing permit is not supported by data. There is not a single study or report from any jurisdiction in the entire country that provides evidence that restricting short-term rentals reduces homelessness or improves affordability. What I do know is that repealing this permit will make it impossible for me to stay in my home. For this reason, I respectfully urge the City Council to reject this idea.

Communication from Public

Name: P Baca

Date Submitted: 12/03/2024 12:31 PM

Council File No: 14-1635-S10

Comments for Public Posting: I oppose the elimination of the extended permit for home sharing hosts. Nithya Raman is hurting small business owners whose livelihood depends on this STR income.

Communication from Public

Name: Alex Harris

Date Submitted: 12/03/2024 12:41 PM

Council File No: 14-1635-S10

Comments for Public Posting: I strongly support continuing the Extended Homeshare program. I live in Echo Park, and when I need to go out of town for work or family, I share my house on Airbnb. Being able to rent my place when I'm out of town benefits everyone. Homesharing benefits guests. Families visiting LA especially love my place, because they can get a real house where they can bring their pets and walk to Dodger Stadium. You can't find that in a hotel. And I'm not alone: Every home-share gives visitors a unique slice of what it's like to live in their neighborhood of LA, including many places where there simply aren't hotels. Homesharing benefits hosts. It helps us defray the sky-high rents and mortgages we unfortunately need to pay to live here. We can make some of that back when we leave town, effectively lowering our cost of housing. And homesharing benefits the City. There's the direct revenue, of course. The Extended Homeshare permit itself costs over \$1,000, paid to the City. And Airbnb charges and remits 14% a transient occupancy tax for every night someone stays in an Airbnb. But there are also the less direct benefits of guests patronizing local businesses (like those around Echo Park I send my guests to) and gaining a deeper appreciation for LA. I understand the worry that people who don't live here will buy up property. But LA already thoroughly vets homesharers to make sure they're actual residents. But sometimes we need to be out of town for more than a couple months a year. There's no reason for our houses to sit empty when we're gone - that's the real wasteful vacancy problem. Allowing extended homesharing fixes it. Let's keep it.

Communication from Public

Name: Julien Bohbot

Date Submitted: 12/03/2024 01:28 PM

Council File No: 14-1635-S10

Comments for Public Posting: December 3, 2024 Dear City council members I hope this letter finds you well. I am writing to express my concerns regarding the potential removal of the extended short-term rental program in Los Angeles. For the past five years, I have successfully hosted guests through Airbnb. As a superhost with a five-star rating, I have maintained a flawless record and have never encountered any issues. I typically host one or two guests at a time in my spacious master bedroom, which includes a separate entrance, ensuring a pleasant experience for everyone. Hosting has not only provided me with a source of income but has also allowed me to connect with people from around the globe. All of my guests have expressed wonderful feedback, and I take pride in the positive experiences I create for them. The income generated from hosting is essential for me, especially as costs continue to rise. The tax revenue generated by short-term rentals significantly benefits the city, and I believe it is important to recognize the positive impact we have on the local economy. My property is situated near prominent attractions, such as museums and The Grove, making it a desirable destination for visitors. If the extended short-term rental program were to be removed, it would pose a significant financial burden on me, making it challenging to meet my mortgage obligations and other expenses. I urge you to reconsider the decision to remove the extended short-term rental program. It has been a vital source of income for many hosts like myself, and I truly appreciate your attention to this matter. Thank you for your consideration. Sincerely, Julien Bohbot

Communication from Public

Name: Melissa Lee Wilson

Date Submitted: 12/03/2024 01:41 PM

Council File No: 14-1635-S10

Comments for Public Posting: I'm not at all sure why Los Angeles would even consider getting rid of the home sharing permit program. I am an airbnb host and this money, for me, is NOT extra money. This is how I pay my mortgage and other bills. Without this income, I may myself become homeless. I am sympathetic to the homeless problem in Los Angeles, but taking away how other people earn a living is not the solution.,

Communication from Public

Name:

Date Submitted: 12/03/2024 01:55 PM

Council File No: 14-1635-S10

Comments for Public Posting: I have been hosting short term rentals now for 7 years. I've had numerous guests that have stayed in my place over the years tell me about some of the bad experiences they've had at hotels around my area. From people fighting in the hallways to drug sales outside and homeless people. They said sometimes they didn't even feel safe. Even though they were paying more money to stay at the hotel, they were so happy that they found my place. I take pride in keeping my place looking nice. A comfortable, quiet place for people to stay when they are not at home. To take this away from not only me offering this service, but to travelers coming to the area is a disservice. I know people in the hotel industry probably hate us doing this service but things evolve and businesses have to change with it. We are offering a better place to stay than most hotels and at more affordable rates . I love meeting the people that come to my airbnb to stay. I get to know people from other parts of the world and hear their story and why they're here. If you take that away from us, it's like giving the hotels a monopoly on the area and they can charge whatever they want, because they will control the rates. Any company having a monopoly on any business is not a good thing. Be mindful of the people like me, that have one small guesthouse in their backyard and enjoy doing this service for visitors to our city more enjoyable. Please do not take this away from me.

Communication from Public

Name: Zuko

Date Submitted: 12/03/2024 02:08 PM

Council File No: 14-1635-S10

Comments for Public Posting: Ending short-term rentals in Downtown LA would be like turning off the city's cultural and economic life support. This bustling urban center thrives on the diversity and vibrancy brought by short-term visitors, who inject life into the local economy and culture. Without them, local businesses from quirky coffee shops to avant-garde galleries would see a sharp decline, as the transient population vanishes. The unique charm of staying in an authentic LA loft or a creatively renovated apartment would be lost, leaving tourists with the cookie-cutter experiences of hotels. Moreover, this move wouldn't solve the housing crisis but might instead lead to more vacant properties as owners struggle to find long-term tenants in a market used to the flexibility of short-term lets. In essence, it would be like subtracting color from a masterpiece, leaving Downtown LA less vibrant, less diverse, and economically stifled.

Communication from Public

Name: Aaron Tano

Date Submitted: 12/03/2024 02:40 PM

Council File No: 14-1635-S10

Comments for Public Posting: Hello Council Members, I am urging you to please not change the HSO and continue to allow extended permits for homesharing. Many hosts rely on this income to keep ourselves from becoming homeless. For many people this is the only way that we can stay in our homes. The economy for many is very difficult and by disallowing homesharing you would be contributing to the homelessness issue.

Communication from Public

Name: Curtis

Date Submitted: 12/03/2024 02:55 PM

Council File No: 14-1635-S10

Comments for Public Posting: It is a mistake to remove the extended homesharing permit. It is not fair to individuals who make investments in the local homesharing economy to have the rules constantly changed on them. We are forced into a partnership with the local government when we make these investments and how can we be certain about them when government makes it uncertain that the rules will remain the same as time goes on? Completely unfair. While I understand there needed to be an initial ordinance put in place when homesharing was new, to keep altering the rules making it difficult for actors to navigate in this space and plan for the future is completely wrong and an overreach on the part of the local government.

Communication from Public

Name: Caron Mhunzi

Date Submitted: 12/03/2024 03:16 PM

Council File No: 14-1635-S10

Comments for Public Posting: LA Council, The elimination of the extended homesharing permit would be crushing to my family. Airbnb my home is vital to affording my mortgage. My husband and I have a baby and need family to come stay at our property for childcare. We cannot do long term tenants at this time and plan to eventually move in our parents to take care of them. The city needs to do something to distinguish small time land lords from corporations running big complexes. The city is always focused on homelessness which is great but the pendulum has swung so far that it has become too risky to rent your home to tenants who can decide to stop paying rent altogether. As a homeowner you have so little rights in this city. You are stuck trying to pay your mortgage while someone is squatting in your home. People take advantage and I am concerned about foreclosing on my home if I end up in this situation. Airbnb allows us the flexibility to have family come stay in the space for longer chunks of time and cut childcare costs. We book guests on airbnb for a minimum of 30 days and it has worked so well for us in the affordability of our home and living in Los Angeles. We charge market rent for our airbnb, it does not cover our full mortgage. We are honest people trying to get by. My husband is currently laid off, and I can't imagine what situation we would be in if we could no longer host people short term on the homesharing permit. Please consider middle class families that rely on this permit otherwise you will see many home foreclosures across Los Angeles.

Communication from Public

Name:

Date Submitted: 12/03/2024 03:40 PM

Council File No: 14-1635-S10

Comments for Public Posting: Short-term rentals support the local economy, provide significant tax revenue for the city, and enable many residents to afford to stay in their homes. The extended home-sharing permit is an important resource that gives Angelenos the flexibility of sharing their home when needed, especially for those who rely on home sharing to remain in the city. I OPPOSE ELIMINATING THE EXTENDED STR PERMIT. I SUPPORT HOSTS ABILITY TO RENT THEIR HOME LEGALLY FOR AN EXTENDED PERIOD OF TIME. PEOPLE DEPEND ON IT, THE CITY DEPENDS ON IT.

Communication from Public

Name: Maura O'Neill

Date Submitted: 12/03/2024 03:51 PM

Council File No: 14-1635-S10

Comments for Public Posting: Please see comment letter from Better Neighbors LA attached.



@better_LA
betterneighborsla.org

December 3, 2024

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

Re: Department of City Planning and City Attorney reports relative to the Home-Sharing vendor evaluation, process enhancements, and compliance strategies (CF 14-1635-S10)

Dear Chair Raman, and Councilmembers of the Los Angeles City Council Housing and Homelessness Committee,

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, it is vital that the Housing and Homelessness Committee take the necessary precautions to enforce the HSO and protect housing stock in Los Angeles. BNLA encourages changes to the HSO to preserve housing for long-term residents, and we urge the Committee to improve enforcement starting today.

The HSO is only as strong as the enforcement that backs it. BNLA recently released a report that investigates the prevalence of noncompliant STRs and the lack of adequate citations issued by the City of Los Angeles. Illegal STR listings remove desperately needed housing from the market for long-term tenants. Between February and August of this year, there were 94 citations issued by the City. During that same time frame, Granicus reported an average of 9,464 noncompliant listings each month to the City, which means the City is responding to about 1 in every 100 noncompliant listings.² Furthermore, using data from Inside Airbnb, we determined that between January and August of 2024, 68% of neighborhoods in Los Angeles had STRs in

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

² BNLA data on file from CPRA to the City Planning Department.

violation of the HSO but no citation action from the City. The City's enforcement is not comparable to the number of noncompliant listings.

Given the scale of noncompliance and lack of enforcement, BNLA recommends you **move forward with several administrative recommendations today** to take immediate steps to protect housing in Los Angeles. Several actionable recommendations come from the City Attorney and the Planning Department Home-Sharing Evaluation reports. The steps we recommend taking today are listed below.

The Department of City Planning's recommendations to:

- **Strengthen requirement for proof-of-residence;**
- **Terminate registration on transfer of ownership/tenancy;**
- **Require 6 months of tenancy prior to issuing registration;**
- **Allow submittal of complaints and documents via 311;**
- **Revoke noncompliant listings registrations;**
- **Add Home-Sharing data to Zimas;**

The City Attorney's recommendation to:

- **Increase fines based on nightly rates and square footage**, though we support the stronger fine recommendations we discuss below;
- **Improve the ACE Process and maintain a sufficient number of ACE hearing officers;**
- **Improve the registration process and LAHD or DBS inspections of proposed Home-Sharing properties;**
- **Obtain more data, including an increased use of subpoena power.**

Besides these recommendations, the Committee should take additional steps to ensure the HSO is enforced and has its intended effect of protecting long-term residents in the City. BNLA supports recommendations that the Committee should incorporate in amendments to the HSO moving forward, which include:

- **Including a private right of action for Home-Sharing violations in the HSO**, which a motion in the Planning and Land Use Management Committee already includes (CF-14-1635-S12).
- **Implementing the City Attorney's recommendation to adopt an Electronic Verification System for platforms** to have an affirmative verification approach that ensures platforms will check the legal status of a listing before a booking is completed.
- **Adopting Better Neighbor's five key recommendations** that make changes to STR registration requirements and stronger penalties for violation. The recommendations are outlined below:
 1. **Create registration numbers for exemptions (hotels/motels, bed and breakfasts, TORS) to make it harder for operators to falsely claim exemptions.** Hosts who list

legitimate exempt properties on short-term rental platforms would be required to display a registration number on the listing, making it easier for the City to determine whether the property advertised is truly exempt from the HSO. The City and platforms could then efficiently enforce the HSO against listings that claim false exemptions.

2. **Limit registration numbers to one listing**, which would make it more difficult for operators to use the same registration number on multiple listings or use other people's registration numbers.
3. **Amend the primary residency requirement to require a homeowner's exemption or a notarized letter from a landlord affirming residency and eliminate voter registration as proof of proving primary residency.** This would make it more difficult for hosts to falsely claim their short-term rental property is their primary residence.
4. **Improve the fine structure.** A fine of \$605 might work to correct inadvertent errors, but it does not deter fraudulent behavior intended by hosts and platforms to evade the laws. We recommend a new fine for illegal operators:
 - a. Create a new \$50,000 fine for fraudulent behavior by egregious violators. The fine would be a one-time fine per unit, rather than a per day fine, and would be for:
 - Falsely claiming an exemption;
 - Using another person's registration number;
 - Using a false registration number;
 - Using a false address;
 - Using the same registration number for more than one unit on multiple listings;
 - Falsely claiming primary registration; or
 - A landlord providing a letter for a tenant who does not live in the unit.
5. **Create a new \$1,000 fine per listing for a platform's failure to share data every month.** Currently, the HSO requires platforms without a Platform Agreement to send Planning a list of all listings with the registration number, host name, address, and number of days booked. Only Airbnb has a Platform Agreement with the City, however there are many more short-term rental platforms advertising listings within the City of Los Angeles. If platforms were required to pay a fine per listing, then they would be much more likely to ensure the compliance of their listings with the HSO.³

As hosts continue to list noncompliant listings and short-term rental platforms repeatedly violate the HSO, the Committee needs to take a strong stance, ensuring that the responsibility of enforcing the ordinance is clear. In doing so, the Committee will protect and preserve housing for long-term tenants. We encourage the Committee to take steps today to implement recommendations from the City Attorney and City Planning Department's report back that will improve the effectiveness of the HSO. Moreover, we urge the Committee to enact a private right

³ <https://www.betterneighborsla.org/s/Better-Neighbors-LA-August-2024-Enforcement-Report-FINAL.pdf>

of action, an electronic verification system for platforms, and BNLA's recommendations moving forward. These recommendations will increase the efficiency of the City's enforcement efforts and make evading the HSO more difficult, particularly for flagrant violations. Thank you for your time and consideration. Should you have any questions, please contact maura@betterneighborsla.org.

Sincerely,

/s/

Randy Renick

Communication from Public

Name: Andrew & Tim

Date Submitted: 12/03/2024 04:21 PM

Council File No: 14-1635-S10

Comments for Public Posting: With cost of living (including real estate taxes) so high and rising quickly in LA, we are relying on the income from home sharing to cover our housing cost to remain in our home and LA. The extended home-sharing income is an important part of it, too. Reducing or removing it would not solve the housing shortage or homeless problems, in our option. Quite contrary, it would drive people like us (who depend on the short-term rental income) out of our home and the city.

Communication from Public

Name: Ken King

Date Submitted: 12/03/2024 03:34 PM

Council File No: 14-1635-S10

Comments for Public Posting: The American Dream - “the ideal that every citizen of the United States should have an equal opportunity to achieve success and prosperity through hard work, determination, and initiative.” This definition should also include immigrants that come to this country. But the City continues to take way this "dream" by continuing to pass legislation that takes away this possibility from the little guy and gives it back to the big guys. By passing this legislation, you're giving back to the Marriott's, Hiltons, Pritzker's, so they can afford their multi-million dollar homes and lifestyles and taking away the possibility for others to achieve this dream. Your not only affecting the owners, but also the support staff, not unlike the big hotels, that work hard to try and achieve success and prosperity.

Communication from Public

Name: Chanchanit Martorell
Date Submitted: 12/03/2024 03:35 PM
Council File No: 14-1635-S10

Comments for Public Posting: Dear Members of the Los Angeles City Council Housing and Homelessness Committee, The Thai Community Development Center (Thai CDC) writes to you in support of five proposed recommendations to Los Angeles' Home-Sharing Ordinance (HSO) that aim to improve enforcement. As the state's homelessness crisis continues to worsen, it's vital that the Housing and Homelessness Committee takes the necessary precautions to enforce the HSO and protect housing stock in Los Angeles. The goal of these recommendations is to update the registration, renewal, and fine process to minimize common violations, including the use of fraudulent registration numbers and exemptions. Thai CDC is a nonprofit organization engaged in community economic development, immigrant/workers/human rights advocacy, food justice, health care access, and provision of social and legal services. While based in Thai Town/East Hollywood, our work also has a statewide, national and transnational reach. Since its establishment in 1994, Thai CDC addresses the needs of Thais and other disadvantaged immigrants faced with substandard housing condition and lack of access to basic health services, education and employment opportunities. We urge the committee to move forward with the recommendations that Better Neighbors Los Angeles outlines in their August monthly enforcement report. We recommend the following: 1) Create registration numbers for exemptions (hotels/motels, bed and breakfasts, TORS) to make it harder for operators to falsely claim exemptions. 2) Limit registration numbers to one listing. 3) Amend the primary residency requirement to require a homeowner's exemption or a notarized letter from a landlord affirming residency, and eliminate voter registration as proof of proving primary residency. 4) Improve the fine structure. 5) Create a new \$1,000 fine per listing for a platform's failure to share data every month. Moving forward with these amendments to the HSO is an opportunity for the Committee to take another step in protecting and preserving housing and long-term tenants in Los Angeles. By pairing registration and listing requirements with a more robust fine schedule, these recommendations will increase the efficiency of the City's enforcement efforts and make evading the HSO more difficult for especially egregious violators. For these reasons, we

encourage the Committee to move forward with this set of pivotal recommendations. Should you have any questions, please email me at chancee@thaicdc.org. Thank you



THAI COMMUNITY DEVELOPMENT CENTER

6376 Yucca Street, Suite B

Los Angeles, CA 90028

Phone : (323) 468-2555 Fax : (323) 461-4488

December 3, 2024

Dear Members of the Los Angeles City Council Housing and Homelessness Committee,

The Thai Community Development Center (Thai CDC) writes to you in support of five proposed recommendations to Los Angeles' Home-Sharing Ordinance (HSO) that aim to improve enforcement. As the state's homelessness crisis continues to worsen, it's vital that the Housing and Homelessness Committee takes the necessary precautions to enforce the HSO and protect housing stock in Los Angeles. The goal of these recommendations is to update the registration, renewal, and fine process to minimize common violations, including the use of fraudulent registration numbers and exemptions.

Thai CDC is a nonprofit organization engaged in community economic development, immigrant/workers/human rights advocacy, food justice, health care access, and provision of social and legal services. While based in Thai Town/East Hollywood, our work also has a statewide, national and transnational reach. Since its establishment in 1994, Thai CDC addresses the needs of Thais and other disadvantaged immigrants faced with substandard housing condition and lack of access to basic health services, education and employment opportunities.

Hosts Claim Fraudulent Exemptions. Better Neighbors LA found that STR hosts list dubious exemptions to skirt registration requirements. According to public records obtained through a California Public Records Act Request, as of June there were only 601 properties in the City eligible for one of three legitimate HSO exemptions: hotel or motel, bed and breakfast, and Transient Occupancy Residential Structure (TORS). However, in July 2024, 2,187 listings claimed such an exemption, which means at least 1,586 of these listings are likely fraudulent.¹ For example, there were 535 listings claiming to be bed and breakfasts, despite only 5 legitimate bed and breakfasts operating in the City. With so many instances, it is clear that some hosts are fraudulently claiming to be exempt from HSO regulations to evade oversight.

Hosts Use Deceptive Registration Numbers. According to Better Neighbor LA's analysis of Inside Airbnb data, in July of 2024 there were 1,638 listings on Airbnb without valid registration numbers. Of these, 1,062 were clearly fraudulent. For example, 539 listings have duplicate registration numbers, and 523 listings have fake registration numbers. The other 578 listings are either missing a registration number or listing expired registration numbers.² Hosts using duplicate or fake registration number are committing fraudulent activity in order avoid City oversight. Both fraudulent registration numbers and false exemptions allow operators to circumvent the HSO for their own profit, while long-term residents continue to face a housing affordability crisis.

As discussed, hosts and short-term rental platforms continue to violate the HSO. Changes to the registration requirements in the HSO alone will not be enough to stop violations; stronger penalties for

¹ Data on file with Better Neighbors LA. Inside Airbnb: <https://insideairbnb.com/> .

² Data on file with BNLA, Inside Airbnb: <https://insideairbnb.com/>.

egregious violations must also be implemented. **We urge the committee to move forward with the recommendations that Better Neighbors Los Angeles outlines in their August monthly enforcement report.** We recommend the following:

1. **Create registration numbers for exemptions (hotels/motels, bed and breakfasts, TORS) to make it harder for operators to falsely claim exemptions.** Hosts who list legitimate exempt properties on short-term rental platforms would be required to display a registration number on the listing, making it easier for the City to determine whether the property advertised is truly exempt from the HSO. The City and platforms could then efficiently enforce the HSO against listings that claim false exemptions.
2. **Limit registration numbers to one listing.** This would make it more difficult for operators to use the same registration number on multiple listings or use other people's registration numbers.
3. **Amend the primary residency requirement to require a homeowner's exemption or a notarized letter from a landlord affirming residency, and eliminate voter registration as proof of proving primary residency.** This would make it more difficult for hosts to falsely claim their short-term rental property is their primary residence.
4. **Improve the fine structure.** A fine of \$605 might work to correct inadvertent errors, but it does not deter fraudulent behavior intended by hosts and platforms to evade the laws. We recommend two new fines:
 - a. Create a new \$50,000 fine for fraudulent behavior by egregious violators. The fine would be a one-time fine per unit, rather than a per day fine, and would be for:
 - i. Falsely claiming an exemption;
 - ii. Using another person's registration number;
 - iii. Using a false registration number;
 - iv. Using a false address;
 - v. Using the same registration number for more than one unit on multiple listings;
 - vi. Falsely claiming primary registration; or
 - vii. A landlord providing a letter for a tenant who does not live in the unit.
5. **Create a new \$1,000 fine per listing for a platform's failure to share data every month.** Currently, the HSO requires platforms without a Platform Agreement to send Planning a list of all listings with the registration number, host name, address, and number of days booked. Only Airbnb has a Platform Agreement with the City, however there are many more short-term rental platforms advertising listings within the City of Los Angeles. If platforms were required to pay a fine per listing, then they would be much more likely to ensure the compliance of their listings with the HSO.³

Moving forward with these amendments to the HSO is an opportunity for the Committee to take another step in protecting and preserving housing and long-term tenants in Los Angeles. By pairing registration and listing requirements with a more robust fine schedule, these recommendations will increase the efficiency of the City's enforcement efforts and make evading the HSO more difficult for especially egregious violators. For these reasons, we encourage the Committee to move forward with this set of pivotal recommendations. Should you have any questions, please email me at chancee@thaicdc.org.

Sincerely,



Chanchanit Martorell
Executive Director

³ <https://www.betterneighborsla.org/s/Better-Neighbors-LA-August-2024-Enforcement-Report-FINAL.pdf>

Communication from Public

Name: Barbara Eva Barrington

Date Submitted: 12/03/2024 07:28 PM

Council File No: 14-1635-S10

Comments for Public Posting: RE: FILE #14-1635-S10 Dear Sirs & Madames; I am writing concerning the above-referenced file number. The topic is STR extended permits. I have owned and operated a legal Airbnb since 2017. My space is an “ensuite,” which is 250 square feet. It has a bed, a sofa, a kitchenette, and a small bathroom with a shower only. I have been a super-host since my inception, and I intend to remain so. My space is perfect for one or two folks staying short term, due to its tiny size, lack of closet space and full kitchen. My space is not suitable for long-term living. It is my understanding that this committee would like to limit (again) the amount of time that good, law-abiding hosts such as myself can host. This would be EXTREMELY punitive to me. Your argument is to ease homelessness. Below is a list of reasons that I think this is illogical and punitive: You have already limited people to one unit per property and the property must be the primary residence of the person hosting. This is already limiting the amount of STR’s that qualify. There are many ‘illegal’ STR’s in the city hosted by people who are willing to break the rules and circumvent your requirements. It seems more attention should be paid to this issue and punish/force those people who have places that would be suitable for long-term rental to rent them long term, not folks like me who have one room for rent, an en-suite in their home or one unit in a primary residence per your requirements. Having a STR unit has allowed me to stay in my home. I work in the fitness industry which took a huge hit during covid. I am still not back to my prior earnings from before the pandemic, as several places I worked either went out of business or changed models. Inflation has further eroded my earnings not to mention our property taxes and utilities keep rising. Being an older adult, divorced female in the fitness industry also limits my earnings as I am not able to work 16-hour days, 7 days a week anymore. I have had to cut back on long hours and teaching/training as I physically just cannot do it. Having my STR has helped me stay in my home. Los Angeles charges a hefty fee for the extended stay permit (more than San Bernardino County and San Luis Obispo by far). We pay TOT and \$3 per night fee for nights booked. This is good for Los Angeles and employs people to oversee this I assume. Our small STR’s add value to the neighborhood. People walk to restaurants and shops close to me that they would not be visiting

if they stayed in an area where more hotels were. We also employ cleaners, handymen, and gardeners to beautify the areas where our guests stay. I can allow my friend who has suffered a serious illness live with me for very little compensation because my mortgage is offset by my STR. I could not do this if I didn't have my STR. She would then essentially be homeless. I foster dogs and cats for a rescue group and help get them homes. Because I have an STR, I have more time to give to animals and offer help. Not being able to rent my STR full-time would mean I would have to get a second and possibly third job, I would not be able to help ease this crisis if I didn't have the time to give. I have lived in my home for 21 years. I have beautified my home and add value to my neighborhood. If my earnings were impacted severely enough by not allowing me to offer STR for the full year, I would have to consider selling and moving. This would further devastate me as I would then also lose what employment I have left. Please consider the good people that you would harmfully impact should you further limit the ability of law-abiding Angelenos to offer extended STR. I appreciate your time and sincere consideration of the aforementioned points. Sincerely yours, Eva Barrington

Communication from Public

Name: Susan Damante

Date Submitted: 12/03/2024 07:33 PM

Council File No: 14-1635-S10

Comments for Public Posting: To Whom it May Concern: I am a divorced/single Mother and Grandmother. I live on my own and work in the entertainment industry and as a professional driver to make ends meet. My income does NOT pay my rent and I depend on Airbnb to pay the mortgage of my Duplex in Mid-City Heights, Los Angeles. The extended homesharing permit is an important resource that gives me the flexibility of sharing my home when needed, especially so that I can remain in Los Angeles where I work and where my family resides. Susan Damante

Communication from Public

Name: Andrew Achen

Date Submitted: 12/03/2024 07:33 PM

Council File No: 14-1635-S10

Comments for Public Posting: December 3, 2024 To: City Council's Housing and Homelessness Committee Council File Number 14-1635-S10 *sent via web-portal* RE: Opposition to STR ordinance changes that could eliminate Extended Homesharing Permits Dear Councilmember Raman and Committee Members: My name is Andrew Achen, a 60-year-resident of Los Angeles and I live in Sherman Oaks. I, as well as my parents, are native Angelenos and all of my grandparents called Los Angeles home for more than 60 years. After nearly two years of research, planning and then remodeling my home in Sherman Oaks at a significant cost, I opened the doors to my short-term, Vacation Rental (commonly referred to as, "Airbnb") in June of 2021. To date, it's been a rousing success with rave reviews and overwhelming responses from happy travelers: Europe, Canada, China and the USA. In addition, the City of Los Angeles has received well over \$40,000 from Occupancy Taxes generated by my endeavor, including VRBO as well as Airbnb (June 2021 – present). The genesis for this idea really came from necessity. I was about to be 56 years of age with no viable means of a sufficient retirement income. At the time (and occasionally now on a mostly retired basis), I'd been working as a Realtor for 14 years and had grown weary of my commission-based, single income and the anxiety this created in my life. My Airbnb has been an absolute god-send that allows me to keep the house and have some security for the future. Just the thought of losing my extended permit makes me sick to my stomach. I find it overwhelmingly unreasonable to those of us who have been doing Airbnb for years, those of us who are dependent on the income, to now face such a substantial loss. I offer as an idea, maybe as a compromise, that any new applicant (after a certain date) be notified upon registration on the Los Angeles Home Sharing website that extended permits will not be issued in the future. Those of us who embarked upon this endeavor years ago, and in good-faith, should be given the opportunity to continue business as usual. In summation, I am one person with one home. While I understand and empathize with the plight of the underhoused, low income, etc... I don't feel that it is fair to change the rules midstream: the result, at least for me, would be catastrophic. Thank you for your time. Sincerely, Andrew Achen Sherman Oaks, CA 91423

Communication from Public

Name: Pablo

Date Submitted: 12/03/2024 07:48 PM

Council File No: 14-1635-S10

Comments for Public Posting: Hello, I host on Airbnb to help support my family and allow us to pay our mortgage. If you end the extended home sharing permit, I will no longer be able to provide for my family and we will need to move out of our home. I don't understand the problems it causes and why you want to eliminate it. Please do not do this.

Communication from Public

Name: Fer romero

Date Submitted: 12/03/2024 07:57 PM

Council File No: 14-1635-S10

Comments for Public Posting: "As an Airbnb host, I provide short-term housing that caters to tourists, not long-term renters. This helps boost the local economy without affecting the availability of homes for those in need. Restricting hosting would hurt small business owners like me who rely on this income to make ends meet."

Communication from Public

Name: Roni
Date Submitted: 12/03/2024 08:05 PM
Council File No: 14-1635-S10

Comments for Public Posting: Dear City Council, Attn: CM Raman, CM Blumenfield, CM Padilla, CM De Leon & CM Rodriguez Re: Eliminating the extended permits for STRs As a STR provider, I can attest to the fact that, when properly managed, Short Term Rentals provide a vital amenity to neighborhoods. I also participated, in conjunction with many council members, to help create a reasonable path toward allowing homeowners the ability to create an income to allow them to stay in their home, and to eliminate the party houses and neighborhood disruptors. These new laws created a median to allowing homeowners the personal freedom over their homes, while eliminating violators of the laws. However, the city has not upheld their end of the deal by the absolute absence of services assigned to the newly appointed Host Compliance and LADBS. We pay the highest rate for registration services in the US, yet have no access to services; this is a form of taxation without representation. Additionally, the violators are not being stopped, while law abiding citizens are being punished. The mismanagement of services is egregious and ongoing. This is an easy fix. Instead of taking away the small income from mom and pop setups, therefore forcing people to sell their homes and moved out of state, I'd like to address the reality of the misinformation about STRs. 1) STRs have NOTHING to do with affordable housing. - They are less than 1% of housing in LA county. - The city has thrown billions into homelessness, yet it continues to rise and without an accounting of monies spent. - The homeless cannot afford to even rent a room via a Long term lease agreement. We are not in this category 2) If STR houses are only allowed to rent long term, the housing crisis would be fixed. - See above. But, in addition, home owners who have switched to STRs have done so because of the increasing egregious RSO and rental laws making it impossible for small landlords to evict bad tenants. Many have lost their properties, many have lost months of income and most will not convert to LTRs. There will be NO affordable housing opening up if STRs are eliminated. 3) Affordable housing is impossible in California due to increasing rates of homeowners insurance, utility costs, repairs and maintenance, taxes, and the limits of RSO increases do not allow landlords to cover the increases. Therefore, they must stop doing business in California. 4) See #3, add that the mass exodus of landlords in California has

also lead to scarcity in rentals. Scarcity increases costs. So, it is obvious to everyone that the current direction of overregulation is driving up costs and making housing even more unattainable. The benefits of STRs: 1) It is a MONEY MAKER FOR THE CITY. 2) It helps bring tourists to the city. Small local businesses benefit by having a STR in their area. 3) STRs allow people who cannot afford the high cost of hotels to visit their family and tourist destinations. Statistics show that when STRs are eliminated, the cost of hotels increase substantially and tourism goes down substantially. I could go on and on. However, the direction the city is taking is not for the health and survival of its constituents, rather only for the hotels and lobbyists. The people spoke in the latest election and they have elected to have a government that is for the people. So, I hope, with all my heart, that you elect to serve your constituents for the greater interest now. Please, do the right thing and allow people the financial, yet responsible path to keeping their homes. The problem of management can very easily be addressed and fixed; there are many folks with a lot on knowledge in the area willing to consult. Thank you for your consideration. Roni LA

Communication from Public

Name: Peter Schultz

Date Submitted: 12/03/2024 08:07 PM

Council File No: 14-1635-S10

Comments for Public Posting: I live in Hollywood and rent my home through AirBnB while I travel, which is usually every other month. Although I am grateful for the extra income the most important aspect for me is to keep my home inhabited with respectful guests while I am gone. Because of the number of homeless and vagrants near my home I am concerned that if I left my home unoccupied I would run the risk of break-ins, vandalism and possibly squatters. Being able to rent my home keeps my home safe while I am away.

Communication from Public

Name: Clergy and Laity United for Economic Justice
Date Submitted: 12/03/2024 08:38 PM
Council File No: 14-1635-S10
Comments for Public Posting: Please see attached letter in support of recommendations to the Home Sharing Ordinance.



Clergy & Laity United
Board for Economic Justice

Ali Tweini

Teamsters Local 2010

Co-Chair

Rev. Canon Melissa McCarthy

Episcopal Diocese of Los Angeles

Co-Chair

Christopher French

Hollywood Community Housing

Treasurer

Mary Stancavage

Meditation Coalition

Secretary

Izeah Chairez

National Union of Healthcare
Workers (NUHW)

Rabbi Neil Comess-Daniels

Beth Shir Shalom, Emeritus

Rabbi Dr. Stephen J. Einstein

Congregation B'nai Tzedek

Rabbi Daniel Mehlman

Temple Ner Tamid

Pastor Bridie Roberts

UNITE HERE Local 11

Vivian Rothstein

Santa Monica CLUE Committee

Derek Smith

United Food and Commercial
Workers International Union
(UFCW) Local 324

Rev. Gary Bernard Williams

Saint Mark United Methodist
Church

Staff

Rev. Jennifer Gutierrez

Executive Director

Sithy Bin

Faith-Rooted Organizer

Rev. Mary Duong

Senior Faith-Rooted Organizer

Lucero Garcia

Senior Faith-Rooted Organizer

Matthew Hom

Faith-Rooted Organizer

Rev. Kara Howard

HR/Admin Manager

Pastor Cue Jn'Marie

Faith-Rooted Organizer

Julia Mata

Communications Coordinator

Adam Overton

Faith-Rooted Organizer

Guillermo Torres

Director of Immigration

Jacki Weber

Development Director

As CLUE, we educate, organize, and mobilize the faith community to accompany workers and their families in their struggle for good jobs, dignity, and justice.

December 3, 2024

Dear Members of the Los Angeles City Council Housing and Homelessness Committee,

Clergy and Laity United for Economic Justice (CLUE) writes to you in support of five proposed recommendations to Los Angeles' Home-Sharing Ordinance (HSO) that aim to improve enforcement. As the state's homelessness crisis continues to worsen, it's vital that the Housing and Homelessness Committee takes the necessary precautions to enforce the HSO and protect housing stock in Los Angeles. The goal of these recommendations is to update the registration, renewal, and fine process to minimize common violations, including the use of fraudulent registration numbers and exemptions.

CLUE educates and mobilizes faith communities to work for economic justice for low wage workers. We are an interfaith movement based in the knowledge that all religions believe in justice. Low wage workers are particularly vulnerable to housing insecurity, which is only exacerbated by affordable housing units being used as short-term rentals.

Hosts Claim Fraudulent Exemptions. Better Neighbors LA found that STR hosts list dubious exemptions to skirt registration requirements. According to public records obtained through a California Public Records Act Request, as of June there were only 601 properties in the City eligible for one of three legitimate HSO exemptions: hotel or motel, bed and breakfast, and Transient Occupancy Residential Structure (TORS). However, in July 2024, 2,187 listings claimed such an exemption, which means at least 1,586 of these listings are likely fraudulent.¹ For example, there were 535 listings claiming to be bed and breakfasts, despite only 5 legitimate bed and breakfasts operating in the City. With so many instances, it is clear that some hosts are fraudulently claiming to be exempt from HSO regulations to evade oversight.

Hosts Use Deceptive Registration Numbers. According to Better Neighbors LA's analysis of Inside Airbnb data, in July of 2024 there were 1,638 listings on Airbnb without valid registration numbers. Of these, 1,062 were clearly fraudulent. For example, 539 listings have duplicate registration numbers, and 523 listings have fake registration numbers. The other 578 listings are either missing a registration number or listing expired registration numbers.² Hosts using duplicate or fake registration number are committing fraudulent activity in order to avoid City oversight. Both fraudulent registration numbers and false exemptions allow operators to circumvent the HSO for their own profit, while long-term residents continue to face a housing affordability crisis.

As discussed, hosts and short-term rental platforms continue to violate the HSO. Changes to the registration requirements in the HSO alone will not be enough to stop violations; stronger penalties for egregious violations must also be implemented. We urge the committee to move forward with the recommendations that Better Neighbors Los Angeles outlines in their August monthly enforcement report. We recommend the following:

- 1. Create registration numbers for exemptions (hotels/motels, bed and breakfasts, TORS) to make it harder for operators to falsely claim exemptions.** Hosts who list legitimate exempt properties on short-term rental platforms would be required to display a registration number on the listing, making it easier for the City to determine whether the property advertised is truly exempt from the HSO. The City and platforms could then efficiently enforce the HSO against listings that claim false exemptions.

¹ Data on file with Better Neighbors LA. Inside Airbnb: <https://insideairbnb.com/>

² Data on file with BNLA, Inside Airbnb: <https://insideairbnb.com/>

2. **Limit registration numbers to one listing.** This would make it more difficult for operators to use the same registration number on multiple listings or use other people's registration numbers.
3. **Amend the primary residency requirement to require a homeowner's exemption or a notarized letter from a landlord affirming residency, and eliminate voter registration as proof of proving primary residency.** This would make it more difficult for hosts to falsely claim their short-term rental property is their primary residence.
4. **Improve the fine structure.** A fine of \$605 might work to correct inadvertent errors, but it does not deter fraudulent behavior intended by hosts and platforms to evade the laws. We recommend two new fines:
 - a. Create a new \$50,000 fine for fraudulent behavior by egregious violators. The fine would be a one-time fine per unit, rather than a per day fine, and would be for:
 - i. Falsely claiming an exemption;
 - ii. Using another person's registration number;
 - iii. Using a false registration number;
 - iv. Using a false address;
 - v. Using the same registration number for more than one unit on multiple listings;
 - vi. Falsely claiming primary registration; or
 - vii. A landlord providing a letter for a tenant who does not live in the unit.
5. **Create a new \$1,000 fine per listing for a platform's failure to share data every month.** Currently, the HSO requires platforms without a Platform Agreement to send Planning a list of all listings with the registration number, host name, address, and number of days booked. Only Airbnb has a Platform Agreement with the City, however there are many more short-term rental platforms advertising listings within the City of Los Angeles. If platforms were required to pay a fine per listing, then they would be much more likely to ensure the compliance of their listings with the HSO.³

Moving forward with these amendments to the HSO is an opportunity for the Committee to take another step in protecting and preserving housing and long-term tenants in Los Angeles. By pairing registration and listing requirements with a more robust fine schedule, these recommendations will increase the efficiency of the City's enforcement efforts and make evading the HSO more difficult for especially egregious violators. For these reasons, we encourage the Committee to move forward with this set of pivotal recommendations. Should you have any questions about CLUE's support for these measures, please contact the Rev. Jennifer Gutierrez at jgutierrez@cluejustice.org.

Sincerely,



Rev. Jennifer Gutierrez
Executive Director

³<https://www.betterneighborsla.org/s/Better-Neighbors-LA-August-2024-Enforcement-Report-FINAL.pdf>

Communication from Public

Name: Courtney Levine
Date Submitted: 12/03/2024 09:07 PM
Council File No: 14-1635-S10

Comments for Public Posting: I am a long time Venice Beach resident (26 years), a new Venice Beach homeowner (4 years) and have been an Airbnb host for the last year. I am writing today to strongly oppose eliminating the extended home sharing permit. My beautiful home, which I would desperately love to be able to afford to keep, not only brings in the most wonderful people from all over the world who spend tons of money in my neighborhood supporting local businesses, but all throughout Los Angeles during their time here. In addition to my guests supporting the local economy, in order to keep my home beautiful and an asset to my neighborhood, I hire local housekeepers, painters, carpenters, gardeners, landscapers, plumbers, roofers, appliance repair people, handymen and various other tradespeople, contributing even further to my local and city economy. I shop locally and on craigslist to furnish and supply my home. I pay an insane amount of taxes for my tiny bungalow, always on time, and I am an active member of my neighborhood and community. The revenue earned from my airbnb helps me and my home remain a vital part of my neighborhood, community and city. Short term rentals obviously provide significant tax revenue for the city, and as a self-employed single woman, the option of being able to share my 1911 bungalow, which I meticulously maintain, enables me to actually afford to stay in my home. The extended homesharing permit is an important resource that gives me and a multitude of other Angelenos the flexibility of sharing their home when needed, especially for those who rely on home sharing to remain in the city, which becomes increasingly difficult, bill after bill, year after year. Thank you for considering the City Homeowners who are doing everything they can to participate in their local economies, bring in revenue for the City and local governments and stay in their cherished homes.

Communication from Public

Name: Courtney Levine
Date Submitted: 12/03/2024 09:23 PM
Council File No: 14-1635-S10

Comments for Public Posting: I am a long time Venice Beach resident (26 years), a new Venice Beach homeowner (4 years) and have been an Airbnb host for the last year. I am writing today to strongly oppose eliminating the extended home sharing permit. My beautiful home, which I would desperately love to be able to afford to keep, not only brings in the most wonderful people from all over the world who spend tons of money in my neighborhood supporting local businesses, but all throughout Los Angeles during their time here. In addition to my guests supporting the local economy, in order to keep my home beautiful and an asset to my neighborhood, I hire local housekeepers, painters, carpenters, gardeners, landscapers, plumbers, roofers, appliance repair people, handymen and various other tradespeople, contributing even further to my local and city economy. I shop locally and on craigslist to furnish and supply my home. I pay an insane amount of taxes for my tiny bungalow, always on time, and I am an active member of my neighborhood and community. The revenue earned from my airbnb helps me and my home remain a vital part of my neighborhood, community and city. Short term rentals obviously provide significant tax revenue for the city, and as a self-employed single woman, the option of being able to share my 1911 bungalow, which I meticulously maintain, enables me to actually afford to stay in my home. The extended homesharing permit is an important resource that gives me and a multitude of other Angelenos the flexibility of sharing their home when needed, especially for those who rely on home sharing to remain in the city, which becomes increasingly difficult, bill after bill, year after year. Thank you for considering the City Homeowners who are doing everything they can to participate in their local economies, bring in revenue for the City and local governments and stay in their cherished homes.

Communication from Public

Name: Nhat Phong Tran

Date Submitted: 12/03/2024 10:24 PM

Council File No: 14-1635-S10

Comments for Public Posting: ****Public Comment to City Council Hearing on Short Term Rentals**** Good afternoon Councilmembers, My name is Nhat Phong Tran, a resident of Los Angeles for over 15 years. I am here to strongly oppose the proposed cancellation of extended home sharing for short-term rentals. I urge you to consider the broader implications of such a decision on residents, our economy, and the spirit of Los Angeles as a city of international commerce and opportunity. ****1. Industry Realities and Housing Accessibility for Residents**** As someone working in the entertainment industry, I frequently travel out of state, often for six months or more each year. Extended home sharing allows residents like me to maintain ownership of our homes while making use of them during our absences. This flexibility ensures that our homes are not left vacant, contributing to neighborhood vibrancy and housing availability for visitors. Additionally, homeowners and renters across diverse industries rely on income from short-term rentals to offset the rising costs of living in Los Angeles. Cancelling extended home sharing could disproportionately affect middle-class families, artists, and freelancers who depend on this supplemental income to remain in the city they love. ****2. Economic Contribution of Short-Term Rentals**** Los Angeles is a global hub of innovation, tourism, and cultural exchange. Short-term rentals support this identity by offering flexible accommodations for travelers, business professionals, and families. In 2022 alone, short-term rentals contributed millions in local taxes and bolstered local businesses by providing visitors with access to unique neighborhoods, restaurants, and attractions. Curtailing this option would directly harm our city's reputation as a destination for international travelers and reduce vital economic activity. ****3. Legal and Regulatory Concerns**** Prohibiting short-term rentals on private property raises significant concerns regarding property rights. The U.S. Constitution and California law protect an individual's right to use their property in lawful and reasonable ways. Restrictive measures that excessively limit short-term rentals may be considered an overreach, infringing on the rights of homeowners without clear justification. Courts in other jurisdictions have struck down overly burdensome regulations, citing violations of due process and property rights. Furthermore, rather than

imposing outright bans, the city should explore balanced regulatory approaches, such as: - Enforcing compliance with zoning and safety codes, - Increasing transient occupancy taxes, - Establishing noise and nuisance standards. These measures ensure accountability while preserving the ability of residents to responsibly share their homes. **4. Inconsistencies with Los Angeles' Identity** Los Angeles has long been a city defined by innovation, adaptability, and diversity. Short-term rentals reflect these values by providing housing solutions that adapt to the needs of residents and visitors alike. Cancelling extended home sharing is not only an economic setback but also a decision that undermines the city's commitment to inclusivity and international service. **Conclusion** I urge the council to reject this measure and instead consider a regulatory framework that balances the interests of homeowners, renters, and the broader community. Short-term rentals, when managed responsibly, provide immense benefits to our city and its residents. Let us protect the economic and cultural vitality that makes Los Angeles a beacon for the world. Thank you for your time and consideration. Sincerely, Nhat Phong Tran

Communication from Public

Name: J.P. Young

Date Submitted: 12/03/2024 10:35 PM

Council File No: 14-1635-S10

Comments for Public Posting: Good day council members. My husband and I purchased our home in Van Nuys in 2003 and enjoyed 19 years of relative peace and quiet, a sense of privacy and safety, and neighbors who cared for each other, or at least were civil and polite. I imagined my house being my forever home. I can not imagine that anymore. In 2022 my next-door neighbor sold her home to a contractor, who obtained a permit to build a three bedroom ADU in the backyard and turned the existing home into a rental duplex. The contractor does not live on the property. The ADU unit was rented well over a year ago to a woman who manages an illegal AirBnB rental there and charges guests \$600 a night, with the owner's knowledge. The AirBnB's property manager is polite and apologetic when I reach out to her about late night disturbances from her guests but really it's inexcusable. As for the homeowner, Mike, when I initially brought up my complaint to him about the excessive late night noise, he told me he didn't care and that I should call the police. When the city relaxed its zoning and permitting rules for ADUs, the well-meaning intention was to increase affordable long-term housing. Instead, the lax rules around ADUs have encouraged far too many homeowners such as Mike next-door to turn such properties into illegal cash cows at the direct expense of neighbors. As the situation is currently, I feel like a hostage in my home. I can no longer enjoy my backyard due to the frequent disruptive noise coming from next-door. Worse, I have been kept up or woken up enough times that it is unacceptable and has greatly affected my family. Please crack down or better yet shut down these illegal AirBnBs, especially when legitimate and documented complaints are brought to your attention. I implore you to do something significant about this serious matter. Thank you for your consideration.

Communication from Public

Name: Stanley Nowak

Date Submitted: 12/03/2024 11:41 PM

Council File No: 14-1635-S10

Comments for Public Posting: DEAR HOUSING AND HOMELESSNESS COMMITTEE MEMBERS: Being a legitimate host who actually resides in the property that is being Home-Shared is not an easy thing to do. There are many compromises that are required to share one's place of residence. I am a five star rated host on Airbnb and take great pride and responsibility in being a host. Every dollar I earn helps my wife and I with the cost of owning our home. Upgrades and improvements we make contribute to the local economy and our guests spend money supporting the local business community. Most importantly, we are able to use that portion of our home that is Home-Shared for our own use when we do not have guests staying with us. Rather than trying to restrict a legitimate Host's ability to participate in Extended Home-Sharing of their personal residence, why not enforce the Ordinance as written and crack down on illegal Home-Sharing by individuals who do not reside in the property that is being shared? I know of three such properties in my immediate neighborhood including the house next door to where my wife and I live. Why not restrict Home-Sharing to only the actual owners of the properties in which they reside? When I advertise townhouse style apartments we own that are located at 741 Wilcox Avenue, up to 20% of the inquiries received are from individuals who are looking for landlords willing to allow for short-term rental use of their properties. I am attaching one such inquiry I received on December 2, 2024 through the Zillow platform. Instead chasing after hardworking, legitimate Hosts who are successful enough to qualify for Extended Home-Sharing, chase after those folks who are cheating the system by strictly enforcing the Ordinance as currently written or limit Home-Sharing to those properties that are actually resided in by the owners of the properties and not by renters of the properties. Regards, Stanley Nowak

- Properties
- Messages**
- Alerts

Oksana Yeryomenko 323-365-6834 ✕

Cancel **Call**

Oksana Yeryomenko Yesterday
741 Wilcox Ave #A

Hello! I'm very interested in le...

INQUIRED ☆

Prab Singh Yesterday
741 Wilcox Ave #A

I would like to schedule a tour...

TOUR REQUESTED ☆

Recsy Rex Manembu Dec 1st
741 Wilcox Ave #A

I would like to schedule a tour...

TOUR REQUESTED ☆

Bardia Bararpour Nov 29th
741 Wilcox Ave #A

Hello! Is this unit still availabl...

Yesterday

About me
as of Dec 2, 9:53 PM

Ideal move in date
12/03/2024

Total occupants
2

Total bedrooms desired
3

See more in Renter Profile...

OY

Hello! I'm very interested in leasing this property for 12 months with the intention of using it for short- and mid-term rentals. I can ensure the property will be well-maintained at my expense and professionally managed to the highest standards. Let me know if we can discuss further details!

OY

Oksana Yeryomenko
741 Wilcox Ave #A

📞 Call ✉️ Copy email

Note

Add note e.g. tour scheduled 📝

Next step

Invite to apply

By clicking Invite to apply, you agree to comply with the [Terms of Use](#) and the [Rental User Terms](#).

Renter Profile

Ideal move in date
12/03/2024

Total occupants
2

Communication from Public

Name: Yossi Klein

Date Submitted: 12/03/2024 05:18 PM

Council File No: 14-1635-S10

Comments for Public Posting: We'd like to protest the possible removal of the ability to have extended sharing. As it is, the \$1000 fee is exaggerated and takes a toll on our young families income. To remove this ability would be too much. The money we bring in from the extra room in our house helps us cover our costs for our 4 young children. It feels like it's just the big chain hotels coming after us small people trying to support our families. Please be there with us, the "small guys", working hard to make ends meet. Thank you!

Communication from Public

Name:

Date Submitted: 12/03/2024 05:44 PM

Council File No: 14-1635-S10

Comments for Public Posting: Airbnb released a report showing hosts in the Los Angeles metro area welcomed nearly 3.3 million guest arrivals who contributed an estimated \$4.4 billion in local economic activity in 2023. The report offers data-driven insights into the benefits home sharing brings to the greater Los Angeles area. By welcoming guests into their homes who then spend money on local businesses, hosts in the Los Angeles metro area helped support approximately 43,000 jobs and generate \$1.2 billion in total tax revenue. This is in addition to the more than \$35 million in local occupancy taxes contributed to the City of Los Angeles in 2023. The report also analyzes the housing market in the greater Los Angeles area where the chronic underproduction of housing is the leading cause of rising housing costs. According to Airbnb's analysis, 373,000 housing units would have needed to be added in the Los Angeles metro area over the last five years to stabilize rent growth at the rate of inflation, but only 140,000 units were actually constructed over that time. By contrast, entire home listings on Airbnb booked for more than 90 nights a year represent 0.23 percent of the Los Angeles metro area's 4.8 million housing units.



Airbnb Economic Impact & Housing Report

Los Angeles Metro



Airbnb's economic benefits to Los Angeles

Airbnb got its start during the Great Recession as a way to help our founders pay their rent. More than 15 years since our founding, approximately 1 million people stay in Airbnb listings across the U.S. on any given night and more than 40 percent of Hosts say the income from hosting allows them to stay in their homes.

Today, the typical Host shares one home on Airbnb, helping to provide affordable accommodation options for guests, disperse travel to new destinations, and generate billions in economic activity and tax revenue for communities. Airbnb promotes the kind of travel and tourism that is good for Hosts, guests, and local communities:

- Airbnb Hosts keep the vast majority of what they charge for their listing, and unlike many big hotels, Hosts help keep that money in their communities.
- Airbnb listings are located in a wide range of neighborhoods, including neighborhoods that do not typically benefit from tourism.
- When guests arrive at their listing, they often receive recommendations from their Host for local businesses to visit, many of which are in the neighborhood where they stay. This type of hosted travel helps guests live like locals and has significant positive economic impacts as guests spend time and money in local restaurants and businesses.

This report outlines the estimated economic impact of the Airbnb community in greater Los Angeles. Our hope is that this information will help local stakeholders better understand the benefits home sharing provides to the local community.



Los Angeles metro Hosts

Hosting on Airbnb is a vital source of supplemental income for local residents. According to a survey of Hosts in the Los Angeles metropolitan area:¹

62% said the income earned through hosting has helped them stay in their home

26% said hosting helped them avoid foreclosure or eviction

62% use the income from hosting to cover the rising costs of living

In total, Hosts in the Los Angeles area earned nearly \$1.2 billion in 2023.² For low and middle-income Hosts, who are estimated to make up nearly half of the Los Angeles Host population, eliminating the revenue earned through Airbnb would be a major blow, in some cases undermining their ability to afford to live in the region.

¹ Internal survey of Hosts in Los Angeles between January 1, 2023 and December 31, 2023.

² Airbnb earnings are for 2023. Los Angeles median income taken from the [American Community Survey, 2022](#).





Home sharing is an economic engine for the region

By welcoming guests into their home, Hosts on Airbnb also generate economic benefits for the region. In 2023, Hosts on Airbnb welcomed nearly 3.3 million guest arrivals to the Los Angeles metro area who contributed an estimated **\$4.4 billion annually to GDP³**, including:

43,000 jobs supported⁴

\$1.2 billion in total tax revenue⁵

\$35.3 million in local occupancy taxes in the City of Los Angeles⁶ (nearly \$293 million to date)⁷

\$2.6 billion in labor income⁸

³ Economic contribution metrics are generated using [IMPLAN](#)'s input-output model using multipliers from the 2022 data year (the latest available at the time of analysis) for the Los Angeles MSA, and are reported in 2023 dollars. Model inputs are Host earnings & guest spending, where spending is based on a survey of Airbnb guests staying in Los Angeles.

⁴ Estimated number of full-time, part-time and seasonal jobs supported by the output generated by Airbnb activity. This metric includes direct, indirect, and induced effects.

⁵ Estimated total tax revenue associated with economic activity generated by Airbnb stays. This includes the total value of taxes associated with (i) Hosts' income and spending, and the economic activity stemming from guests visiting local businesses, and (ii) tourism taxes directly associated with hosting remitted by Airbnb.

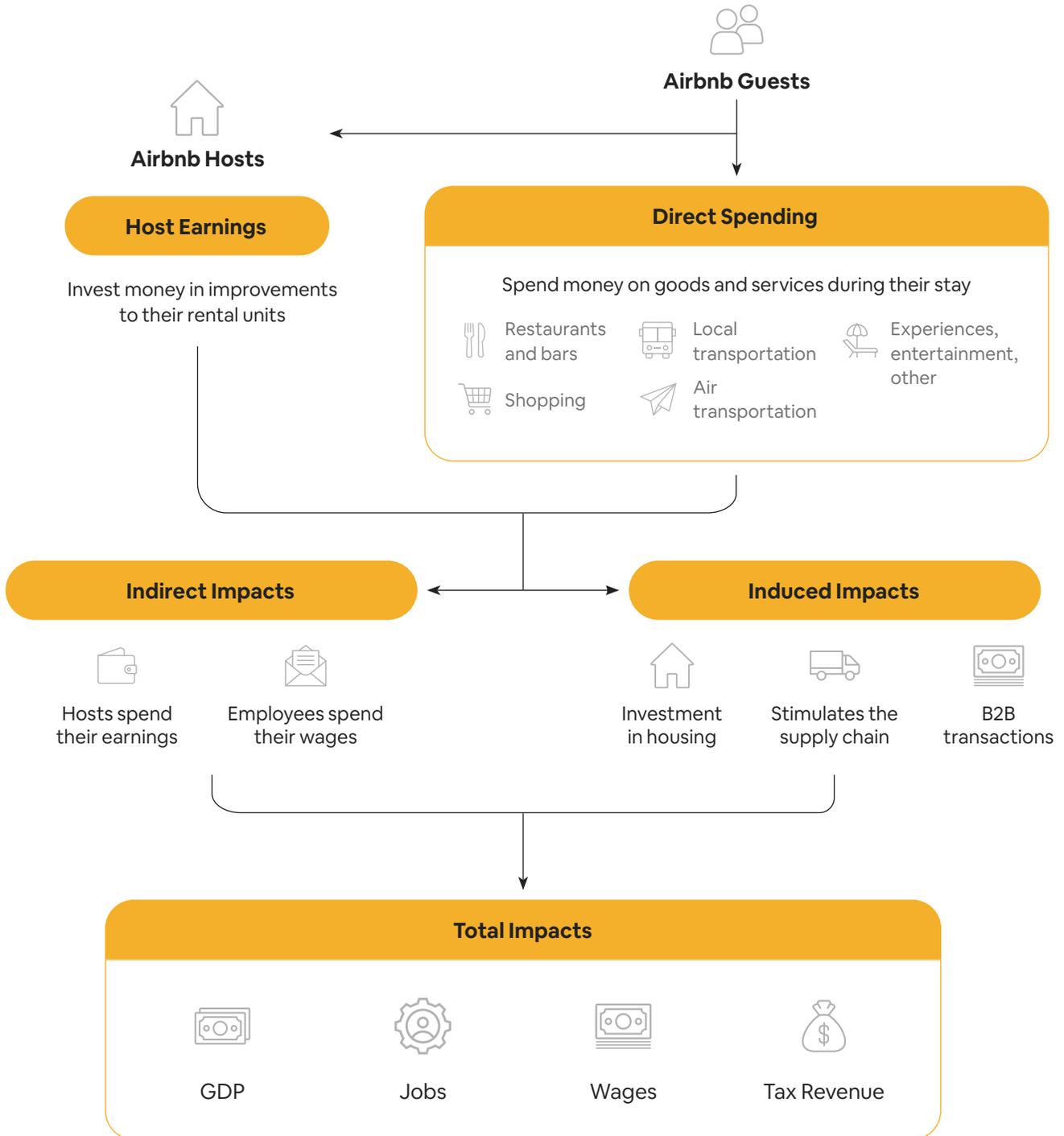
⁶ Local transient occupancy taxes collected and remitted by Airbnb on behalf of Hosts in the City of Los Angeles in 2023

⁷ Local transient occupancy taxes collected and remitted by Airbnb on behalf of Hosts in the City of Los Angeles from 2016 to 2023

⁸ Labor income includes both Proprietor Income (e.g. for small business owners that benefit from guest spending), but also Employee Compensation (e.g. cleaners, employees of small businesses). More details [here](#).



Economic contribution from Airbnb guests & Hosts in 2023





Airbnb and the Los Angeles housing market⁹

Every day, we work with governments to help ensure that hosting on Airbnb, and the economic activity created by hosting, make communities stronger. To date, we've partnered with over 1,000 governments around the world to support common sense rules for short-term rentals.

Through this work, we understand cities continue to navigate unique, complex challenges – including housing affordability. Many experts agree the chronic, decades-long underproduction of new housing supply is driving today's housing affordability challenges. We want to play a role in finding sensible, long-term solutions to help increase the housing supply and work with cities to balance the benefits of home sharing with communities' needs.

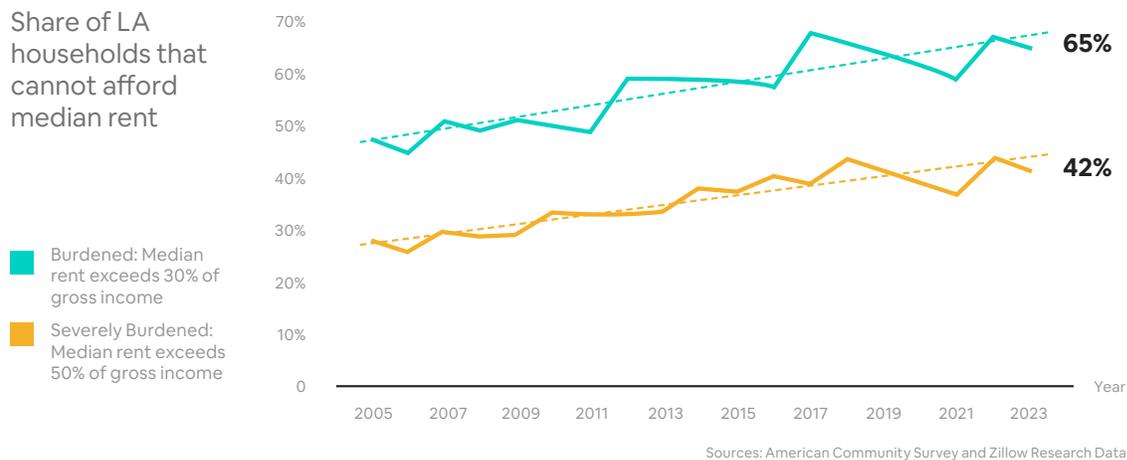
The following section of the report analyzes the number of Airbnb listings to housing units in the Los Angeles metro, outlines some of the primary factors driving local housing concerns, and provides an outline of how Airbnb wants to work with communities to help address the problem.

⁹ References to "Los Angeles" in this report refer to the census-defined Los Angeles-Long Beach-Anaheim, CA Metropolitan Statistical Area (MSA).



A root cause of rising housing costs in Los Angeles

Housing costs in Los Angeles have been rising at a rate higher than incomes for decades, long before Airbnb was even founded. In 2023, nearly two-thirds (65%) of households in the Los Angeles metro area would become rent-burdened if they rented the typical home available — up from 48% in 2005.¹⁰



There are many factors contributing to local housing affordability challenges, from growing income inequality, to decades of exclusionary zoning, and even changing location preferences post-pandemic, including the rise of remote working from home.¹¹

Where many experts agree is that the primary driver of the affordability crisis is chronic underproduction of housing.¹² According to Airbnb’s analysis, **373,000 housing units would have needed to be added in the Los Angeles metro area over the last five years to stabilize rent growth at the rate of inflation, but only 140,000 units were actually constructed over that time, a shortfall of 233,000 housing units.**¹³ Alongside this shortfall, the median rent increased by \$542/month over this time.

¹⁰According to an analysis of American Community Survey and Zillow Research Data.

¹¹Research from the Federal Reserve Board of San Francisco found that more than half of the increase in home prices during the pandemic could be explained by remote work trends. <https://www.frbsf.org/economic-research/publications/working-papers/2022/11/>.

¹²See, for example, [Alleviating Supply Constraints in the Housing Market](#), White House, 2021.

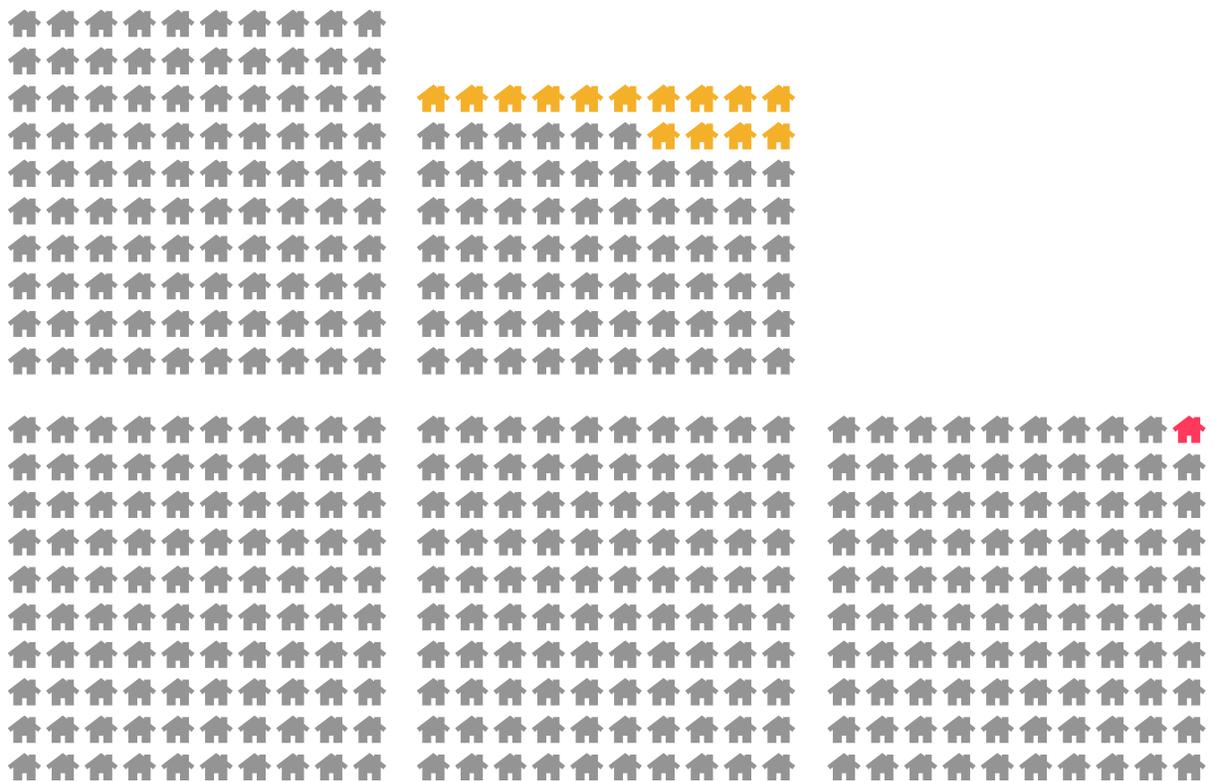
¹³Estimated underproduction of housing is based on a model of supply elasticities found in a seminal article on the subject, [The Geographic Determinants of Housing Supply](#), in *The Quarterly Journal of Economics*, Saiz (2010). To address the possibility that supply elasticities may have declined since this paper was authored, we also considered the extreme case: If supply became completely inelastic (no matter how much the price goes up, no new units are added to supply), the housing needed for rent growth to not exceed inflation would still be substantial – 281k instead of 373k.



Airbnb's impact on Los Angeles housing market

By contrast, Airbnb listings booked for 90 nights or more represent an incredibly small fraction of Los Angeles Metro's 4.8 million housing units. Airbnb 'entire-home' listings booked for more than 90 nights per year in the Los Angeles metro area represent just 0.23% of all housing units in the market and less than 3% of the number of additional housing units needed to prevent rent growth from exceeding inflation over the last 5 years, as estimated by Airbnb.¹⁴

Los Angeles Metro Housing Stock (4.8 million)



 = 10,000 Homes

 Units added 2019-2023

 Airbnb listings booked more than 90 nights per year (0.23%)

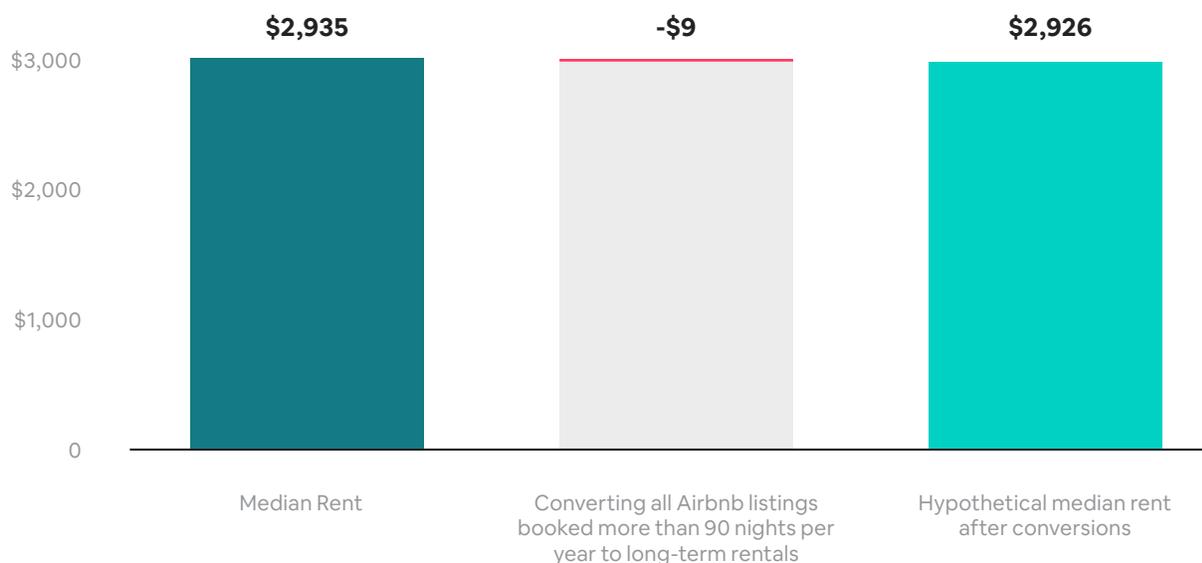
¹⁴Data references bookings from Q4 2022 through Q3 2023.



According to [independent research](#), the growth of Airbnb has had an extremely small impact — and in many cases, no impact at all — on rental cost increases. There is also little evidence that regulations aimed at limiting short-term rentals have successfully brought down housing costs significantly, having an impact on rents of only [2% in Los Angeles](#) as reported in one academic study. In fact, housing costs have continued to soar in markets like [Boston](#) that have severely restricted Airbnb listings. A primary reason, of course, is chronic under-production of new housing.

In the Los Angeles metro area, where the median rent is \$2,935, a price elasticity analysis shows that if all Airbnb listings booked for more than 90 nights per year were suddenly added to long-term rental supply (an unrealistic assumption), it would lead to an average reduction in rent of only **\$9 per month**.¹⁵ The chart below shows how this change compares to the current median rent in the Los Angeles area.

Median rent in Los Angeles Metro Area in 2023



¹⁵The model we use to estimate the impacts of converting Airbnb listings to long-term rental units is simple and transparent: we count the number of units to be converted, and translate that to price changes based on elasticities as reported in Saiz (2010). To address the possibility that supply elasticities may have declined since this paper was authored, we note that the monthly impact on rent would be just \$15 if supply were completely inelastic (i.e. no matter how much the price goes up, no new houses are added to the supply), instead of \$9.



Our commitment to work with policymakers to address the primary causes of rising housing costs in Los Angeles

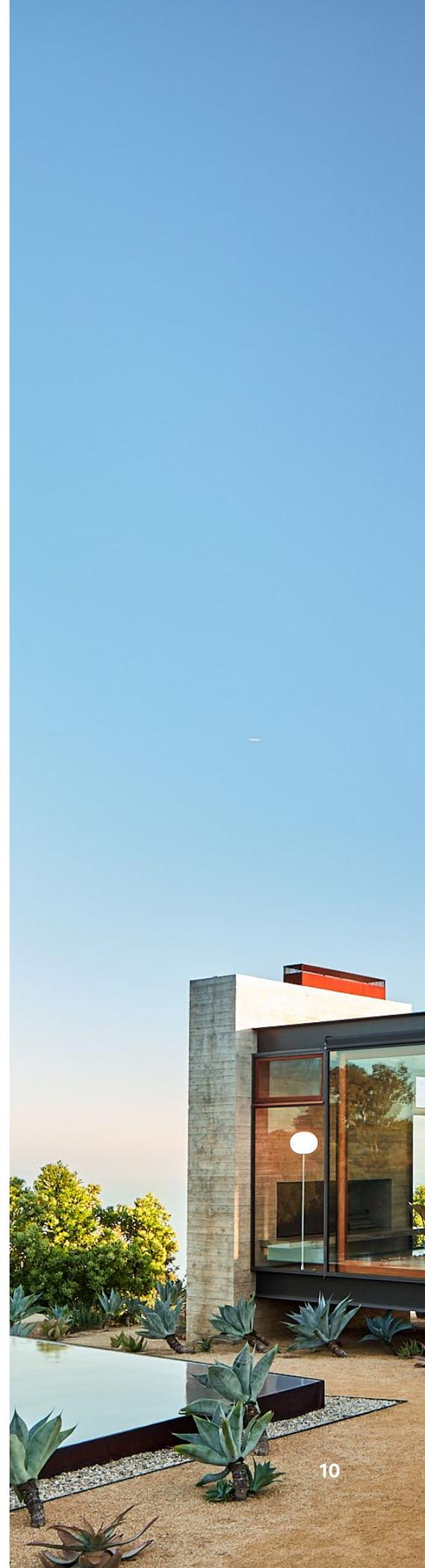
While there are no silver bullets, we're committed to working with Los Angeles policymakers to address the root causes of rising housing costs. Here are some of the ways we've done this to date:

Supporting policies that create more housing supply, either through allocating occupancy tax dollars to the development of new affordable housing or by advocating for deeper policy changes to reduce barriers to increasing housing supply.

Pioneering innovative solutions to support compliance with local regulations. In close cooperation with the City of Los Angeles, we stood up an automated enforcement system during the COVID-19 pandemic, and entered into a platform agreement utilizing the City's Application Programming Interface (API). This first-of-its-kind compliance system has helped the City of Los Angeles enforce its home sharing ordinance, and we continue to support efforts to encourage more platforms to adopt similar tools that promote compliance.

Launching new products like Airbnb-Friendly Apartments, which offers renters — who are more likely to be cost-burdened — a way to earn additional income to offset living expenses through their traditional long-term rental, as well as **Airbnb Rooms**, a renewed focus on everyday Hosts who share space in their own homes.

¹⁶Taxes collected and remitted between August 2016 and December 2023.



Being transparent about our impact with policymakers. In 2020, we launched the City Portal to help cities better understand the Airbnb landscape in their communities and provide tools to help enforce their laws.

Collecting tourism taxes. To date, we have remitted more than \$10 billion in tourism taxes globally, including nearly \$293 million to the City of Los Angeles.¹⁶

Dispersing tourism beyond popular destinations. Through our Flexible search features and Categories, Airbnb is diverting bookings away from cities' most saturated tourist hotspots in support of more sustainable travel trends. Around one in 20 stays on Airbnb are currently booked using flexible search features.

Strengthening protections for renters. We have implemented policies that address concerns around rental evictions and we stand ready to partner with communities where a tenant has been unfairly evicted and take appropriate action.

Airbnb's commitment to working with policymakers

While further restricting short-term rentals in the Los Angeles region will not materially reduce housing costs, it will financially harm thousands of homeowners who supplement their personal income by hosting. Airbnb will continue to work with leaders in the region to support sensible rules that protect the benefits home sharing generates for residents and the local economy, while addressing community concerns.

