

## Communication from Public

**Name:** Travel Technology Association

**Date Submitted:** 11/20/2023 07:48 PM

**Council File No:** 22-0822-S2

**Comments for Public Posting:** The Honorable Members of the Los Angeles City Council Rules Committee Office of the City Council, City Hall 200 North Spring Street Los Angeles, CA 90012 RE: OPPOSE - Police Permit Requirement For Short-Term Rental Hosts Council File Number 22-0822-S2 Dear Members of the Los Angeles City Council Rules Committee: On November 7, City Council voted 14-0 to advance an ordinance attempting to address issues surrounding housing for the homeless, housing supply, and affordable housing. On behalf of the Travel Technology Association's members, including online travel agencies, metasearch engines, short-term rental platforms, global distribution systems, and travel management companies, we write to express our serious concerns with the unrelated provision in the ordinance which requires Los Angeles residents to obtain a Police Permit to share their home ("Section 4", which adds "Sec. 6. Division 10 of Article 3 of Chapter 10" to the Municipal Code). We believe the inclusion of short-term rentals in the definition of "Hotels" is inappropriate and will have massive negative implications for Angelenos who share their primary residence. At the very least "short-term rentals" should be excluded from the definition of hotel entirely, as is the case already in "Section 2" of the ordinance. Beyond that, the Council should consider removing "Section 4" entirely, which is not germane to the housing supply and housing affordability goals of the rest of the measure, and will also unduly burden hotels, particularly those that are small businesses. Short-term rentals already have a registration requirement, as outlined by the 2018 Home-Sharing Program, to rent out their residences located in the City of Los Angeles. This new, additional requirement in Section 4 of the proposed ordinance would add burdensome, needless redundancy, and potential conflict between one permitting system and the other. Thousands of Angelenos rent out their primary homes on a short-term basis to earn extra income for rent, student loan payments, and savings, while paying tourism tax and contributing to the city's economy. Obtaining a police permit would be an incredibly onerous process for these residents. Section 4 will also overwhelm city government with red tape in annually processing several thousand of police permit applications from residents and hotels including burdening subcontractors like restaurants or

coffee shops simply doing business inside a hotel. It will create a bureaucratic backlog for the Los Angeles Police Department at a time when its ranks are at the lowest in decades. Law enforcement resources should be dedicated to protecting our community, not requiring ordinary homeowners to undergo public hearings and mandatory fingerprinting, and comply with vague annual “training” requirements. Additionally, the proposed ordinance will have a chilling effect on residents from diverse backgrounds, including communities of color who may be reluctant to be forced to engage with law enforcement just to be able to welcome visitors into their primary home. As the City is preparing to house a huge influx of tourists for the FIFA World Cup and the Olympic Games, the proposal will also imperil thousands of participants at a particularly important time for the growing tourism economy in Los Angeles. Thank you for your attention to this matter.  
Sincerely, Laura Chadiwck President & CEO Travel Technology Association



November 20, 2023

The Honorable Members of the Los Angeles City Council Rules Committee  
Office of the City Council, City Hall  
200 North Spring Street  
Los Angeles, CA 90012

**RE: OPPOSE - Police Permit Requirement For Short-Term Rental Hosts Council  
File Number 22-0822-S2**

Dear Members of the Los Angeles City Council Rules Committee:

On November 7, City Council voted 14-0 to advance an ordinance attempting to address issues surrounding housing for the homeless, housing supply, and affordable housing. On behalf of the Travel Technology Association's members, including online travel agencies, metasearch engines, short-term rental platforms, global distribution systems, and travel management companies, we write to express our serious concerns with the unrelated provision in the ordinance which requires Los Angeles residents to obtain a Police Permit to share their home ("Section 4", which adds "Sec. 6. Division 10 of Article 3 of Chapter 10" to the Municipal Code).

We believe the inclusion of short-term rentals in the definition of "Hotels" is inappropriate and will have massive negative implications for Angelenos who share their primary residence. At the very least "short-term rentals" should be excluded from the definition of hotel entirely, as is the case already in "Section 2" of the ordinance. Beyond that, the Council should consider removing "Section 4" entirely, which is not germane to the housing supply and housing affordability goals of the rest of the measure, and will also unduly burden hotels, particularly those that are small businesses.

Short-term rentals already have a registration requirement, as outlined by the 2018 Home-Sharing Program, to rent out their residences located in the City of Los Angeles. **This new, additional requirement in Section 4 of the proposed ordinance would add burdensome, needless redundancy, and potential conflict between one permitting system and the other.**

Thousands of Angelenos rent out their primary homes on a short-term basis to earn extra income for rent, student loan payments, and savings, while paying tourism tax and contributing to the city's economy. Obtaining a police permit would be an incredibly onerous process for these residents.

Section 4 will also overwhelm city government with red tape in annually processing several thousand of police permit applications from residents and hotels including burdening subcontractors like restaurants or coffee shops simply doing business inside



a hotel. It will create a bureaucratic backlog for the Los Angeles Police Department at a time when its ranks are at the lowest in decades. Law enforcement resources should be dedicated to protecting our community, not requiring ordinary homeowners to undergo public hearings and mandatory fingerprinting, and comply with vague annual “training” requirements.

Additionally, the proposed ordinance will have a chilling effect on residents from diverse backgrounds, including communities of color who may be reluctant to be forced to engage with law enforcement just to be able to welcome visitors into their primary home.

As the City is preparing to house a huge influx of tourists for the FIFA World Cup and the Olympic Games, the proposal will also imperil thousands of participants at a particularly important time for the growing tourism economy in Los Angeles. Thank you for your attention to this matter.

Sincerely,

Laura Chadwick  
President & CEO  
The Travel Technology Association

## Communication from Public

**Name:** Lynn S. Mohrfeld  
**Date Submitted:** 11/20/2023 06:53 PM  
**Council File No:** 22-0822-S2  
**Comments for Public Posting:** Please see the attached letter for tomorrow's meeting of the Rules, Elections, and Intergovernmental Relations Committee. Thank you - Lynn



LYNN S. MOHRFELD  
President + CEO

OFFICERS

CHAIR  
**HEE-WON LIM-GROSVENOR**  
Pacific Palms Resort  
City of Industry

VICE CHAIR  
**DHRUV PATEL**  
Ridgmont Hospitality  
Oakland

SECRETARY/TREASURER  
**CORMAC O'MODHRAIN**  
Sunstone Hotel Investors  
Irvine

PAST CHAIR  
**TOM PATTON, CHA**  
Ramada by Wyndham  
Santa Barbara  
Santa Barbara

*Protecting the  
rights and interests  
of the California  
hotel industry*

414 29TH STREET  
SACRAMENTO, CA  
95816-3211  
916.444.5780  
www.calodging.com

November 20, 2023

Via email to [eric.villanueva@lacity.org](mailto:eric.villanueva@lacity.org)

Members of the Rules, Elections, and Intergovernmental Relations Committee:

We share a commitment to protecting and enhancing Los Angeles' reputation as a destination for world travelers and as a gateway to all that Southern California has to offer.

It is in this spirit that I write to support the voluntary housing and conditional use permit components of the proposed ordinance the Los Angeles City Council is considering, which is a compromise to Unite Here Local 11's "Homeless in Hotels" ballot measure. The proposed new structured program removes significant safety risks for hotel employees and visitors concerned about turning every hotel in Los Angeles into temporary homeless shelters.

The proposal will formalize a voluntary housing program that will replace the union's March 5, 2024 ballot measure, which mandated hotel housekeepers become the first line of care for unhoused Angelenos.

On behalf of California's 235,000 hotel employees, I am grateful that Council President Krekorian and his colleagues are finding a path to a common-sense solution that will protect hotel employees from the ballot measure proponent's very harmful proposal.

The ordinance ensures that our hotel community is thriving and able to continue providing excellent careers and economic benefits to our iconic neighborhoods throughout Los Angeles.

It is encouraging that City leaders have led us to this compromise that protects our hotel employees – especially housekeepers, our guests and Los Angeles' reputation.

Sincerely,

Lynn Mohrfeld  
President & CEO  
California Hotel & Lodging Association

## **Communication from Public**

**Name:** Nella McOsker  
**Date Submitted:** 11/20/2023 04:10 PM  
**Council File No:** 22-0822-S2  
**Comments for Public Posting:** Please see attached letter.



November 20, 2023

City Council President Paul Krekorian  
200 North Spring Street  
Los Angeles, CA 90012

**RE: Comments on the Responsible Hotel Ordinance**

Dear Council President Krekorian,

Established in 1924, Central City Association (CCA) represents approximately 300 member organizations committed to enhancing Downtown Los Angeles' (DTLA's) vibrancy and increasing opportunity across the region. We are strong advocates for policies and projects that support our city's tourism industry, which is a pillar of our local economy.

We appreciate your leadership to negotiate a compromise "Responsible Hotel Ordinance" that would avoid a dramatic ballot initiative that would impractically require hotels to shelter unhoused individuals in vacant rooms. With the December 1st deadline for the ballot initiative to be withdrawn, we recognize that this ordinance must advance through the legislative process expeditiously. **However, this is a significant piece of legislation that will undoubtedly have major impacts on the city's tourism economy and we believe certain provisions of the proposed ordinance deserve further review and deliberation outside of this accelerated process. Specifically, we request that the provision to require police permits for hotels and short-term rentals be removed from this ordinance as it would saddle lodging operators with unnecessary costs and potentially limit the supply of lodging offerings. Tourism is a critical component of our city's economy and we want to ensure that the lodging ecosystem is robust to continue to support this industry, particularly in the run up to the 2028 Olympics and other major events on the horizon.**

Police permits are typically only applied to brick-and-mortar businesses, many of which have either police or fire alarms, and require fingerprints, background checks, and annual fees. This would be an onerous, costly and sudden requirement that may be an economic tipping point for lodging operators and would discourage future operators. This would shrink the pool of lodging options just as the City's tourism industry is beginning to recover from the effects of the pandemic and in the important period right before the Olympics.

Thank you for your consideration of our comments, which are intended to ensure that the city's tourism ecosystem is positioned to flourish and welcome visitors from around the world for the Olympics and beyond.

Sincerely,

A handwritten signature in black ink, appearing to read "Nella McOsker", written in a cursive, flowing style.

Nella McOsker  
President & CEO  
Central City Association

CC: Members of the Los Angeles City Council Rules, Elections and Intergovernmental Relations Committee