

Communication from Public

Name: James Privette

Date Submitted: 11/21/2023 10:55 AM

Council File No: 22-0822-S2

Comments for Public Posting: The Honorable Member of the Los Angeles City Council Office of the City Council, City Hall 200 North Spring Street Los Angeles, CA 90012 RE: Oppose Police Permit Requirements for Short-Term Rental Hosts, Council File 22-0822-S2 Dear Council President Paul Krekorian and Members of the Los Angeles City Council: I am writing on behalf of Chamber of Progress, a tech industry association promoting technology's progressive future. We respectfully oppose Council File 22-0822-S2, an ordinance requiring short-term rental hosts to file permits with the Los Angeles Police Department (LAPD). This policy negatively affects those homeowners, especially people of color, who decide to earn extra money by allowing visitors into their homes. Homeowners already have to overcome major hurdles through the current Home Sharing Program in order to become short-term rental hosts, and adding an extra barrier is both burdensome and intimidating. Subjecting these hosts to further permitting, mandatory fingerprinting, and additional fees is not equitable in practice as it discourages more residents from becoming hosts, impacting economic opportunities available to residents less willing to interact with LAPD. We are also concerned with the manner in which this policy has been rushed through the legislative process. A lack of transparency around the proposed ordinance and its consideration has left little opportunity for input from impacted city residents, including communities of color which have had a historically strained relationship with law enforcement. The proposed city ordinance was introduced on November 1, and within four weeks there are already two hearings scheduled, both adjacent to a major holiday. There has been little time allotted for community input through public comment. We urge the Council to consider extending this legislative process to receive more input and avoid any unintended consequences that may arise from this new policy. Chamber of Progress supports tech policies that protect consumers and entrepreneurs alike - policies which advance equity and opportunity for all residents. We hope to work with the City Council on alternatives for short-term rental policies through a process that is transparent and leaves room for public input. Because of its impact on homeowners, entrepreneurs, and communities of color, and due to its expedited consideration, we

respectfully encourage the Council to vote down 22-0822-S2.
Sincerely, James Privette Director, Civic Innovation Policy
Chamber of Progress



Nov 21, 2023

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

RE: Oppose Police Permit Requirements for Short-Term Rental Hosts, Council File 22-0822-S2

Dear Council President Paul Krekorian and Members of the Los Angeles City Council:

I am writing on behalf of Chamber of Progress, a tech industry association promoting technology's progressive future. We respectfully **oppose Council File 22-0822-S2, an ordinance requiring short-term rental hosts to file permits with the Los Angeles Police Department (LAPD)**. This policy negatively affects those homeowners, especially people of color, who decide to earn extra money by allowing visitors into their homes.

Homeowners already have to overcome major hurdles through the current Home Sharing Program¹ in order to become short-term rental hosts, and adding an extra barrier is both burdensome and intimidating. Subjecting these hosts to further permitting, mandatory fingerprinting, and additional fees is not equitable in practice as it discourages more residents from becoming hosts, impacting economic opportunities available to residents less willing to interact with LAPD.

We are also concerned with the manner in which this policy has been rushed through the legislative process. A lack of transparency around the proposed ordinance and its consideration has left little opportunity for input from impacted city residents, including communities of color which have had a historically strained relationship with law enforcement.

¹ <https://planning.lacity.org/blog/what-home-sharing-program>

The proposed city ordinance was introduced on November 1, and within four weeks there are already two hearings scheduled, both adjacent to a major holiday. There has been little time allotted for community input through public comment. We urge the Council to consider extending this legislative process to receive more input and avoid any unintended consequences that may arise from this new policy.

Chamber of Progress supports tech policies that protect consumers and entrepreneurs alike - policies which advance equity and opportunity for all residents. We hope to work with the City Council on alternatives for short-term rental policies through a process that is transparent and leaves room for public input.

Because of its impact on homeowners, entrepreneurs, and communities of color, and due to its expedited consideration, we respectfully encourage the Council to **vote down 22-0822-S2.**

Sincerely,

A handwritten signature in cursive script, reading "James Privette". The signature is written in a dark ink and is positioned below the word "Sincerely,".

James Privette
Director, Civic Innovation Policy
Chamber of Progress

Communication from Public

Name: NAACP Beverly Hills-Hollywood

Date Submitted: 11/21/2023 12:01 PM

Council File No: 22-0822-S2

Comments for Public Posting: November 21, 2023 The Honorable Members of the Los Angeles City Council 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 Council President Krekorian and Members of the Los Angeles City Council: On Nov. 7, City Council voted 14-0 to advance an ordinance negotiated between the local hotel union and hotel industry to help address homelessness and boost housing supply. We, a coalition of community organizations and civil liberties advocates, write to express our serious concerns with the unrelated provision in the ordinance which requires LA 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). First, we want to voice our strong concerns with this overall process, which lacked input and engagement from the very people who will be impacted by this proposal. Rushing this ordinance through the legislative process– including less than 24 hour notice for a Rules Committee hearing– sends a negative message to Angelenos who expect transparency from those who represent them on the City Council. The Police Permit requirement is intimidating and will have a chilling effect on communities of color who may be hesitant to go through an invasive process that requires them to interact with law enforcement just to welcome visitors into their home. We are grateful to Pro Tem Marqueece Harris-Dawson who acknowledged these concerns would ultimately dissuade residents from sharing their home and should be part of the discussion moving forward. Furthermore, short-term rental hosts already have a thorough registration requirement, as outlined by the 2018 Home-Sharing Program, to rent out their primary residences located in the City of Los Angeles. This new and entirely separate permitting process in Section 4 would subject residents to onerous public hearings, mandatory fingerprinting, and additional fees. This excessive scrutiny lumps residents who share their primary residence with an array of unrelated businesses, including pawn shops, gun vendors, and dance hall operators. 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 unrelated 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. Section 4 will also overwhelm the Los Angeles Police Department’s slim resources with red tape in annually processing several thousand police permit applications from residents and hotels. As you are aware, Lt. Scott Moffitt acknowledged this would triple the department’s permit workload and will require hiring additional staff to enforce it. Law enforcement resources should be dedicated to tackling major public safety issues and protecting our communities, not requiring ordinary residents to undergo public hearings and mandatory fingerprinting, and comply with vague annual “training” requirements. 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 taxes and contributing to the city’s economy. Obtaining a police permit would be an incredibly onerous process for these residents. Thank you for your attention to this urgent matter. Sincerely, Greater Los Angeles African American Chamber of Commerce The National Association for the Advancement of Colored People (NAACP), Beverly Hills-Hollywood Branch Neighborhood Housing Services of Los Angeles County Valley Industry and Commerce Association cc: Mayor Karen Bass City Attorney Hydee Feldstein Soto



**Greater Los Angeles
African American
Chamber of Commerce**



November 21, 2023

The Honorable Members of the Los Angeles City Council
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 Council President Krekorian and Members of the Los Angeles City Council:

On Nov. 7, City Council voted 14-0 to advance an ordinance negotiated between the local hotel union and hotel industry to help address homelessness and boost housing supply. **We, a coalition of community organizations and civil liberties advocates, write to express our serious concerns with the unrelated provision in the ordinance which requires LA 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).

First, we want to voice our strong concerns with this overall process, which lacked input and engagement from the very people who will be impacted by this proposal. Rushing this ordinance through the legislative process— including less than 24 hour notice for a Rules Committee hearing— sends a negative message to Angelenos who expect transparency from those who represent them on the City Council.

The Police Permit requirement is intimidating and will have a chilling effect on communities of color who may be hesitant to go through an invasive process that requires them to interact with law enforcement just to welcome visitors into their home. We are grateful to Pro Tem Marqueece Harris-Dawson who acknowledged these concerns would ultimately dissuade residents from sharing their home and should be part of the discussion moving forward.

Furthermore, short-term rental hosts already have a thorough registration requirement, as outlined by the 2018 Home-Sharing Program, to rent out their primary residences located in the City of Los Angeles. This new and entirely separate permitting process in Section 4 would subject residents to onerous public hearings, mandatory fingerprinting, and additional fees. This

excessive scrutiny lumps residents who share their primary residence with an array of unrelated businesses, including pawn shops, gun vendors, and dance hall operators.

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 unrelated 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.

Section 4 will also overwhelm the Los Angeles Police Department's slim resources with red tape in annually processing several thousand police permit applications from residents and hotels. As you are aware, Lt. Scott Moffitt acknowledged this would triple the department's permit workload and will require hiring additional staff to enforce it. Law enforcement resources should be dedicated to tackling major public safety issues and protecting our communities, not requiring ordinary residents to undergo public hearings and mandatory fingerprinting, and comply with vague annual "training" requirements.

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 taxes and contributing to the city's economy. Obtaining a police permit would be an incredibly onerous process for these residents. Thank you for your attention to this urgent matter.

Sincerely,

Greater Los Angeles African American Chamber of Commerce

The National Association for the Advancement of Colored People (NAACP), Beverly Hills-Hollywood Branch

Neighborhood Housing Services of Los Angeles County

Valley Industry and Commerce Association

cc: Mayor Karen Bass
City Attorney Hydee Feldstein Soto