



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
37.	72-F,75	Favor	Agueda Dudley-Berrios	
			Alex Dobbs	<p>Dear Honorable Supervisors, my name is Alex Dobbs and I am a constituent from East LA, 90022, district 1. I am also the Community Resource Pastor at Hope Community Church of East LA. I am in full support of regulating short-term rentals because I have seen the rent burden dramatically increase in recent years, and we need to preserve as much long-term housing as possible in residential neighborhoods like East LA. My landlord recently rented out a new two bedroom apartment for \$3,600. On my street on Hoefner and Eagle, the normal rent ranges from \$3000-\$4000 for two bedroom houses, which is extremely unaffordable. My rent increased by \$700 a couple years ago when I moved a mile down the street into a smaller two bedroom. Many of my neighbors live in overcrowded situations because that is what they can afford. I also have friends in my church who are living in a trailer or couch surfing because rent is not affordable with their income. In June 2023, UC San Francisco released a statewide study in California and they found that 70% of the unhoused people they talked with could afford their rent if it was \$300-\$500 cheaper. An Economic Study by Professor David Wachsmuth at McGill University on Short term rentals in LA found that since 2015 2,500 homes have been taken off the long-term rental market, which is responsible for raising rental costs by \$810 per year for the average household.</p> <p>We need to do all we can to decrease the rent burden and help families and people who work be able to afford safe housing. The root of our housing crisis is from not having enough supply to meet the demand, and this ordinance will help create more long-term housing supply. I ask that you approve this ordinance.</p>
			Allison Kirste	<p>My name is Allison Kirste, a resident of Supervisor District 3. Studies show short-term rentals contribute to increases in rent and displacement. This Ordinance will place strong regulations on short-term rentals to protect long-term housing for tenants and potential homeowners. As a renter and student in LA County, I believe my elected leaders should be looking out for my interests, not those of absentee landlords and hosts. Unhosted short-term rentals make housing less affordable for us all.</p>



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37.	72-F,75	Favor	Andrew Davidov	My name is Andrew Davidov, a resident of Supervisor District 1. According to Better Neighbors LA, there are over 2,600 unhosted short-term rentals across unincorporated LA County. Unhosted short-term rentals take up valuable housing stock that may otherwise be available to long-term residents. The proposed Ordinance will help safeguard housing for our families and friends who want to remain in the LA communities they love.
			Andrew Good	
			Angel Mortel	
			Angila Romious	
			Ann Dorsey	A part of addressing the homelessness crisis must be preserving housing for long-term use to prevent displacement in the first place. The Short-Term Rentals Registration Ordinance will do just that by ensuring the primary use of housing is housing and protecting rent-restricted units for those who need them the most. Please protect our community members at risk of displacement and approve the Short-Term Rentals Registration Ordinance. Thank you.
			Brady Collins	
			Brian Olney	My name is Brian Olney, a resident of Supervisor District 5. "Studies show short-term rentals contribute to increases in rent and displacement. This Ordinance will place strong regulations on short-term rentals to protect long-term housing for tenants and potential homeowners. According to Better Neighbors LA, there are over 2,600 unhosted short-term rentals across unincorporated LA County. Unhosted short-term rentals take up valuable housing stock that may otherwise be available to long-term residents. The proposed Ordinance will help safeguard housing for our families and friends who want to remain in the LA communities they love. At least 54 of the 88 incorporated cities across LA County have some form of regulations on short-term rentals. However, residents in unincorporated LA County have no form of relief from the impacts of short-term rentals due to virtually no regulations on the books. I support the Short-Term Rentals Registration Ordinance because it will help protect residents in unincorporated LA County from the threat of displacement due to short-term rentals.



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37.	72-F,75	Favor	Christina M Dirkes	Hello Supervisors, my name is Christina Dirkes and I volunteer with NoHo Home Alliance, and a resident of District 3 - my supervisor is Lindsey Horvath. I'm a renter in Los Angeles, and I urge the Board of Supervisors to pass the Short-Term Rentals Registration Ordinance because studies show short-term rentals contribute to increases in rent and displacement; my sister is a realtor and I've seen it myself: investors are buying up properties to use as AirBnBs and then the people of LA have nowhere to live. Rent goes up exponentially. No one can buy. This Ordinance will place strong regulations on short-term rentals to protect long-term housing for tenants and potential homeowners. Please safeguard our housing for our long-time community members and vote YES on the Short-Term Rentals Registration Ordinance. Thank you.
			Cornelia Dai	My name is Cornelia Dai, a resident of Supervisor District 5. Without regulation, there is no way to protect the interests of current and prospective homeowners and the general public from the adverse effects of short-term rental activity. Indeed, the data showing the negative effects cannot be disputed. Thus, there is no good reason not to move forward with passing this short-term rental law as has been done in the City of Los Angeles and other jurisdictions.
			David Hannum	I'm David Hannum. I spent two years renting an apartment in Marina del Rey and another eight renting an apartment in Torrance. In that time, my rent has skyrocketed, driven in part by the proliferation of short term rentals throughout Los Angeles County. The majority of residents of LA County are long-term renters and we need economic relief. Short-Term rentals reduce the available stock of housing and allow my landlord to squeeze more dollars from my paycheck every month. Please support the registration ordinance to protect the majority of your constituents.
			Deborah K Lopez	
			Debra Mendez	
			Debra L Mendez	Hello Supervisors, my name is Debra Mendez and I am with Pomona Economic Opportunity Center and a resident of District 1. As a homeowner and resident of Los Angeles, I urge the Board of Supervisors to pass the Short-Term Rentals Registration Ordinance because studies show short-term rentals contribute to increases in rent and displacement. This Ordinance will place strong regulations on short-term rentals to protect long-term housing for tenants and potential homeowners. Please safeguard our housing for our long-time community members and vote YES on the Short-Term Rentals Registration Ordinance. Thank you.



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37.	72-F,75	Favor	Denise Overstreet	See attached. Please vote in favor of this ordinance. Short-term rentals are a nightmare for our community.
			Elbert Newton	
			Elizabeth Hernandez	My name is Elizabeth Hernandez, and I am a resident of Supervisor District 1. According to Better Neighbors LA, there are over 2,600 unhosted short-term rentals across unincorporated LA County. Unhosted short-term rentals take up valuable housing stock that may otherwise be available to long-term residents. The proposed Ordinance will help safeguard housing for our families and friends who want to remain in the LA communities they love.
			Esme G Reyna	Hello Supervisors, My name is Esme and I am with Los Angeles Tenants Union. I urge the Board of Supervisors to pass the Short-Term Rentals Registration Ordinance because at least 54 of the 88 incorporated cities across LA County have some form of regulations on short-term rentals. However, residents in unincorporated LA County have virtually no form of relief from the impacts of short-term rentals due to minimal regulations. I support the Short-Term Rentals Registration Ordinance because it will help protect residents in unincorporated LA County from the threat of displacement due to short-term rentals. Please take this important step to preserve housing for long-term residents and approve the Short-Term Rentals Registration Ordinance. Thank you, Esme Germaine Reyna
			Estefany Castaneda	
			Gabriela Ambriz	I support this ordinance because it will help protect residents from the threat of displacement due to short term rentals



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37.	72-F,75	Favor	Griffin Thorne	<p>Hello Supervisors, My name is Griffin Thorne and I am a resident of District 1. You don't need me to tell you that Los Angeles is facing an unprecedented housing affordability crisis. The rapidly rising cost of rent county-wide has increasingly been a growing shadow of pressure and worry in my life. Will I be able to earn enough to live in a modest home? What will I do if my current housing is taken off the market? It feels like my current home is one of a shrinking number of rafts in an ocean. It casts serious doubt that my life will be manageable and sturdy in LA, or that I will be able to call this place home in the future. However, at this time I feel the need to shift the focus off of myself and on to others going through the same or worse hardship. I would say "countless others," were there not numbers to see for ourselves:</p> <p>A study published this year by the UCLA Latino Policy and Politics Institute Latino Data Hub found that 54% of all renters in Los Angeles County are rent burdened. That is 2.7 million people. The rental market is the only viable option for long-term housing for most, and that market is not working for the majority of us. In addition: just last month, LA County held the 2024 Greater Los Angeles Homeless Count. While results will not be released until later this year, the 2023 count found that over 75,000 human beings across LA County were experiencing homelessness.</p> <p>Unhosted short-term rentals are only contributing to this rental affordability crisis. Since 2019, the number of unhosted short-term rentals has grown 95%, now totaling 2,681. As more and more housing units are removed from the long-term rental market, fewer units are available to long-term tenants, thus decreasing the supply amidst continued demand. As a renter and resident of Los Angeles, I urge this board to protect our long-term housing stock for our communities, to ensure the primary use of housing is housing, and to protect rent-restricted units for those who need them the most. I urge the board to protect the people who live and rent in our communities as well as our communities' most vulnerable, by passing the Short-Term Rentals Registration Ordinance. Thank you.</p>



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37.	72-F,75	Favor	Homeowners In The Santa Monica Mountains North Area	<p>We urge you to reconsider the timing of the STR ordinance and implement it in the Santa Monica Mountains North Area immediately as originally planned. We have already left STRs unregulated in our very high fire severity zone for far too long and waiting even longer raises significant safety and liability concerns for residents and the County.</p> <p>Rationale:</p> <ol style="list-style-type: none"> 1. Topanga currently operates with two very different sets of zoning regulations and policy rules for North Area vs. Coastal zoned residents. This has never been an issue and homeowners simply need to accommodate to what their zone requires if they are building, renovating, boarding horses, landscaping, etc. There is nothing new with different STR regulations across the canyon. 2. We live in a very high fire severity zone. It is far better to implement a policy that is safer for many of us than wait AT LEAST 1-2 years for a policy to be present in our dangerous area. 3. Many cities with Coastal zones operate with different sets of policies (Manhattan Beach, Huntington Beach and Santa Barbara to name a few examples) - it does not appear to be a problem while they are pursuing agreed upon ordinances with Coastal coordination. 4. Finally, we have a deep concern that this will delay any STR regulation at least 2 years and maybe longer. On Nov. 23, 2020, the Malibu City Council adopted Ordinance No. 472, the Hosted STR Ordinance, to establish provisions to regulate the short-term rental of property citywide. The Hosted STR Ordinance regulations cannot go into effect until the associated amendments to the City's Local Coastal Program and Land Use Plan are certified by the California Coastal Commission (CCC). There has been no STR regulation in Malibu whatsoever for over 3 years since the original draft of the plan. This poses a tremendous fire and safety danger to their community and this could well be the situation for Topanga as well.
			Hugo Soto-Martinez	
			Isela Barrios	<p>My name is Isela Barrios, a resident of Supervisor District 2. At least 54 of the 88 incorporated cities across LA County have some form of regulations on short-term rentals. However, residents in unincorporated LA County have no form of relief from the impacts of short-term rentals due to virtually no regulations on the books. I support the Short-Term Rentals Registration Ordinance because it will help protect residents in unincorporated LA County from the threat of displacement due to short-term rentals.</p>



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37.	72-F,75	Favor	Joan Harper	My name is Joan Harper and a resident of District 5. As a homeowner and resident of Los Angeles, I urge the Board of Supervisors to pass the Short-Term Rentals Registration Ordinance because studies show short-term rentals contribute to increases in rent and displacement. This Ordinance will place strong regulations on short-term rentals to protect long-term housing for tenants and potential homeowners. Please safeguard our housing for our long-time community members and vote YES on the Short-Term Rentals Registration Ordinance. Thank you.
			Joseph D Pepper	<p>Writing IN FAVOR of County ordinances for regulating Short-Term Rentals in the County Unincorporated areas. Sadly?, as a resident of Marina del Rey? (MDR), these ordinances will not immediately apply to the housing stock is ? that is concentrated in 17 multi-family residential ?projects with over 7,000 rental housing units subject to the Rent Stabilization Ordinance (RSO) of 1979 with the exception of 600 condominium units. Many residents are vexed by abuses of the home-sharing commerce platforms such as Airbnb and VRBO ?AS NOT A SINGLE? RESIDENT OF MDR IS ENTITLED ?TO OFFER A SHORT-TERM RENTAL of their unit for a period of less than 30 days? that turn the homes into de facto hotel room?s. The reason is that the rent stabilized units cannot offer market rate short-term rentals and the Unit Owners of the 600 condominium units are prohibited by the CC&R's from rentals of less than 30 days.</p> <p>?The short-term online rental unit aggregators including Airbnb and VRBO are the villains in this sad story as they serve as enablers of lease-breaking of rental units and unlawful rentals of condominiums by hiding behind Section 230 - "We didn't know, we leave it to the hosts to color between the lines." At minimum, the behavior of the online home-sharing commerce platforms could be described as tortious interference by offering an online marketplace for short-term rentals that violate the anti-subleasing provisions in standard apartment house leases and the CC&R's of the condominium associations.</p> <p>If the foregoing is correct, then why do platforms such as Airbnb and VRBO show short-term rentals available in the Marina del Rey as I write and even go so far as marking the listings with pins on a map? The behavior of these short-term rental aggregators is reprehensible and the ordinances should go much further.</p>



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			<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Name</th> <th style="width: 75%;">Comments</th> </tr> </thead> <tbody> <tr> <td>Joy Langford</td> <td> <p>Please implenemt this ordinance to stop greedy landlords from displacing hard working long term rental residence in favor of STRs. They are creating blithe in our communities and welcoming crime and illicit behaviors such as littering, drinking alcohol outside, loitering and unsavory people gathering. We are hard working Homeowners and landlords in the area trying to provide long term housing at a fair price to hard working people. STRs are displacing many people illegally since they are being put out of their homes under the guise of Owner Occupied. The owner them rents the unit as a STR. This does not create community, it tears it down. Hotel workers are being displaced as well . When people come to town theychoose to pack too many people in a STR to save money that should go to hotels so that they can pay their striking workers a living wage.</p> <p>Ligitimate property owners are begging for relief for the County supervisors. We no longer feel safe living next to these STRs and it's not fair to those of us that actually pay property taxes to live in safe neighborhoods. The amount of money the county would make on the transient tax is not suffice and certainly not fair to property tax payers. WE alsready pay alot in taxes.</p> <p>Please follow the lead of Hawaii, Italy and may other communities around the globe that find Air BnB and other such services an invasion.</p> <p>Thank you</p> </td> </tr> <tr> <td>Julia Glendale Tenants Union</td> <td></td> </tr> <tr> <td>Karen Stasevich</td> <td>The cost of housing, both to people who are trying to buy their own home and renters, is so high, and the inflation of housing costs due to short-term rentals is unconscionable -- anything and everything must be done to reverse this trend.</td> </tr> <tr> <td>Laura Friedman</td> <td></td> </tr> <tr> <td>Maria del Pilar Avalos</td> <td></td> </tr> <tr> <td>Maria Lopez</td> <td></td> </tr> <tr> <td>Maria E Durazo</td> <td></td> </tr> </tbody> </table>	Name	Comments	Joy Langford	<p>Please implenemt this ordinance to stop greedy landlords from displacing hard working long term rental residence in favor of STRs. They are creating blithe in our communities and welcoming crime and illicit behaviors such as littering, drinking alcohol outside, loitering and unsavory people gathering. We are hard working Homeowners and landlords in the area trying to provide long term housing at a fair price to hard working people. STRs are displacing many people illegally since they are being put out of their homes under the guise of Owner Occupied. The owner them rents the unit as a STR. This does not create community, it tears it down. Hotel workers are being displaced as well . When people come to town theychoose to pack too many people in a STR to save money that should go to hotels so that they can pay their striking workers a living wage.</p> <p>Ligitimate property owners are begging for relief for the County supervisors. We no longer feel safe living next to these STRs and it's not fair to those of us that actually pay property taxes to live in safe neighborhoods. The amount of money the county would make on the transient tax is not suffice and certainly not fair to property tax payers. WE alsready pay alot in taxes.</p> <p>Please follow the lead of Hawaii, Italy and may other communities around the globe that find Air BnB and other such services an invasion.</p> <p>Thank you</p>	Julia Glendale Tenants Union		Karen Stasevich	The cost of housing, both to people who are trying to buy their own home and renters, is so high, and the inflation of housing costs due to short-term rentals is unconscionable -- anything and everything must be done to reverse this trend.	Laura Friedman		Maria del Pilar Avalos		Maria Lopez		Maria E Durazo	
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Joy Langford	<p>Please implenemt this ordinance to stop greedy landlords from displacing hard working long term rental residence in favor of STRs. They are creating blithe in our communities and welcoming crime and illicit behaviors such as littering, drinking alcohol outside, loitering and unsavory people gathering. We are hard working Homeowners and landlords in the area trying to provide long term housing at a fair price to hard working people. STRs are displacing many people illegally since they are being put out of their homes under the guise of Owner Occupied. The owner them rents the unit as a STR. This does not create community, it tears it down. Hotel workers are being displaced as well . When people come to town theychoose to pack too many people in a STR to save money that should go to hotels so that they can pay their striking workers a living wage.</p> <p>Ligitimate property owners are begging for relief for the County supervisors. We no longer feel safe living next to these STRs and it's not fair to those of us that actually pay property taxes to live in safe neighborhoods. The amount of money the county would make on the transient tax is not suffice and certainly not fair to property tax payers. WE alsready pay alot in taxes.</p> <p>Please follow the lead of Hawaii, Italy and may other communities around the globe that find Air BnB and other such services an invasion.</p> <p>Thank you</p>																		
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37.	72-F,75	Favor	Mariana Uribe	<p>Hello Supervisors, my name is Mariana Uribe and I am a resident of City Council District 4. I urge the Board of Supervisors to pass the Short-Term Rentals Registration Ordinance because according to Better Neighbors LA, there are over 2,600 unhosted short-term rentals across unincorporated LA County.</p> <p>Unhosted short-term rentals take up valuable housing stock that may otherwise be available to long-term residents. The proposed Ordinance will help safeguard housing for our families and friends who want to remain in the LA communities they love. As a longtime resident of Los Angeles County, I ask you vote to approve the Short-Term Rentals Registration Ordinance and keep these property owners in check, for the sake of the city and its inhabitants. Thank you.</p>
			Marissa Ayala	
			Melissa Manousos	I am a renter in Los Angeles and short-term rentals significantly increase rental costs and further push our unhoused neighbors further away from being able to afford housing in the city. I urge the Board of Supervisors to pass the Short-Term Rentals Registration Ordinance because studies show short-term rentals contribute to increases in rent and displacement. This Ordinance will place strong regulations on short-term rentals to protect long-term housing for tenants and potential homeowners. Please safeguard our housing for our long-time community members and vote YES on the Short-Term Rentals Registration Ordinance. Thank you.
			Nancy Hanna	My name is Nancy Hanna and I am a resident of Supervisor District 1- Housing is critical to the health, safety, and well-being of everyone. The County should prioritize housing for residents and not allow units to be used for short term rentals.
			Nancy H Ibrahim	
			Nithya Raman	
			Pamela Agustin-Anguiano	
			Rebecca Ayala	
			Roberto Garcia-Ceballos	
			Ryan Bell	
			Scarlet Peralta	
Shanti Singh				



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37.	72-F,75	Favor	Tany Ling	<p>Hello Supervisors,</p> <p>My name is Tany Ling, and I am a resident of District 1. As a homeowner in Los Angeles, I urge the Board of Supervisors to protect residents and pass the Short-Term Rentals Registration Ordinance. I have lived in the County of Los Angeles for 26 years and love the sense of community and mutual support I have with my neighbors. However, the growing short-term rental industry in LA County has turned thousands of homes into tourist accommodations, and in the process hallowed out our beloved communities. This ordinance will establish strong and balanced regulations to ensure our neighborhoods are filled with NEIGHBORS who have a stake in the community, not tourists who are here for only a few days at a time.</p> <p>For these reasons, I urge the Board of Supervisors to pass the Short-Term Rentals Registration Ordinance. Thank you.</p>
			Valeria De Gonzalez	<p>My name is Valeria De Gonzalez, a resident of Supervisor District 2. As a homeowner I want to preserve the character and charm of my community. I want to know that my neighbors are invested in keeping the area safe and clean. I don't want to worry about noise, parties, and having conflict with strangers. I am also worried that many of my family and friends have been priced out of buying a home in the area and worry that short term rentals are only going to make the affordability problem worse.</p>
			Victor Gordo	
			Victoria Camacho	<p>My name is Victoria Camacho, a resident of Supervisor District 1. I urge the Board of Supervisors to pass the Short Term Rentals Registration Ordinance because according to Better Neighbors LA, there are over 2,600 unhosted short-term rentals across unincorporated LA County. Unhosted short-term rentals take up valuable housing stock that may otherwise be available to long-term residents. The proposed Ordinance will help safeguard housing for our families and friends who want to remain in the LA communities they love.</p>
			Zoe J Fried	<p>Hello Supervisors, my name is Zohara Fried and I am a resident of District 5/Kathryn Barger.</p> <p>As a renter and resident of Los Angeles, I urge the Board of Supervisors to pass the Short-Term Rentals Registration Ordinance because studies show short-term rentals contribute to increases in rent and displacement. This Ordinance will place strong regulations on short-term rentals to protect long-term housing for tenants and potential homeowners. Please safeguard our housing for our long-time community members and vote YES on the Short-Term Rentals Registration Ordinance. Thank you.</p>



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37.	72-F,75	Oppose	Alan T Zorthian	I am voicing my opinion in opposition to the restrictions on short term rentals. There does not seem to be an item for that on this list. The closest one I see is Amending County Code Title 7
			B Citizen	
			Brittany Alex	
			Chujun Wang	
			Chunming Zhang	
			Dillon Wang	
			Floyd Alex	
			Franklin Jameson	Please re-consider in allowing ADU for short-term rentals when the main house is used as a primary residence. I need this additional income to support my family of 4 and to keep our home. We cannot move into our ADU since the space is too small. We would also never rent it to a long-term tenant since we need the flexibility of in-laws visiting to assist with child care. Please consider allowing ADU for short-term renters when the main house is used as a primary residence. Thank you
			Kenneth E Gruberman	This ordinance, as currently written, has serious flaws and will hurt people like us: responsible hosts who depend on Airbnb income to stay in our homes! While the Hotel Lobby has bankrolled many people in favor of this measure, we who are opposed are on our own. This is even more infuriating when you consider there are NO hotels or motels in Altadena, where we live! Does it make sense to "alleviate the housing shortage" by throwing us out of our homes? That's what will happen if this ordinance passes without any amendments. I urge you to include Supervisor Horvath's amendment and also consider adding an exemption for people over 70 who reside in their homes full-time while hosting Airbnb guests so they can keep paying their mortgages! With a line item that considers the number of hotels / motels in the area. The wording would be simple and easy to do. No one wants a "party house" in their neighborhoods, us included. We are asking for some common sense when it comes to people like us so we can all avoid the debacle in New York when Airbnb was banned; instead, it was driven underground, and nothing changed. As written, this ordinance will have a similar result. Thank you.
Kennice Pierson	Please do not consider passing this ordinance. It will negatively impact small mom and pop landlords.			
Keven Barney	This is an attack on mom and pop landlords. Please do not pass this ordinance.			



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37.	72-F,75	Oppose	Kimberly Gustafson	<p>I urge you to vote against the proposed ordinance. This will have a detrimental impact on the community, reducing affordable vacation places in the Santa Monica Mountains for younger people, reducing tourism money spent, reducing the amount of TOT collected, and taking away from residents the joys of the hosting experience!!</p> <p>If you define "hosted stay" as one where the host is staying in an ADU while guests are in the primary residence, then the reverse MUST be true! If the host is in the primary residence and the guest is in the ADU it must also be considered a "hosted stay". In both situations the host is onsite the same distance from the guests for the same amount of time. There is a greater risk of parties and neighbor complaints in my opinion in the first scenario due to the size of rented space being much larger!!</p> <p>Please protect your residents who truly strengthen tourism and positive experiences in our area by voting against this ordinance.</p> <p>Thank you, Kimberly</p>
			Lisa Johnson	
			Michele Zack	<p>This "one size fits all" ordinance will hurt many in Altadena, who rent out small guest houses on their primary residence properties both to earn money and as a valuable service in a town without a SINGLE hotel room. The over-narrow definition of "hosted stay" which doesn't allow people to host on their primary residence property unless it is within the walls of their home is a draconian "taking" and makes no sense. Renting out short term a small back or pool house, or over the garage flat that you would never consider for long term tenants, will have ZERO impact of LA's homelessness problem. Instead, it removes an income stream from mostly elderly couples, widows, and divorces who are able to stay in their homes only with this extra money. These spaces to provide a great service to those visiting family and friends in Altadena, who wish to avoid the 10 mile car trip, pollution, and much more expensive hotel rooms, of Pasadena. I ask the BoS to please work further to create a fair definition of "hosted stays" before passing this terrible affront to property owners' rights in their own homes.</p>
			Monisha Parker	<p>I don't see the monthly payment for the annual registration fee. \$76.00 a month x 12 months is equal to \$912 a year. Low-income: \$60.00 a month x 12 months is equal to \$ 720 a year</p>
			Nowana Buchanan	



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
37.	72-F,75	Oppose	Robin Barton	<p>To Whom It May Concern,</p> <p>I am in opposition to the proposed ordinance for short term rental.</p> <p>In particular the portion making the primary residence the only allowable short term rental. The inability to use a guest house as a short term rental severely impacts an owners ability to make extra income that helps them to continue to live in their home. The majority of owners will never lease their guest house to a long term tenant. It is a guest house so you can have guests when they would like to have guests and not be forced to become a landlord. Being restricted to only using your primary residence for short term rentals means that only the very wealthy who own a 2nd home are able to rent short term without a significant impact to their lifestyle because if you live in your home you have to move out to accommodate the short term renter. In addition, if the property is unhosted, it leaves the property vulnerable to unauthorized parties as no one is around to supervise the rental.</p> <p>I am also against limiting the number of nights stay per year to 90. The market self dictates the number of nights that are rented and most properties will rent for well less than 40% of available days.</p> <p>Please reconsider these items in your short term rental ordinance, allow guest houses to be used and allow the market to dictate the total number of nights a property is rented.</p> <p>Thank you for your consideration.</p>



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

37.	72-F,75	Oppose	Susan Dantuono	<p>This ordinance, as currently written, has serious flaws and will hurt people like me: responsible hosts who depend on Airbnb income to stay in our homes! While the Hotel Lobby has bankrolled many people in favor of this measure, we who are opposed are on our own. This is even more infuriating when you consider there are NO hotels or motels in Altadena, where we live!</p> <p>Supervisor Horvath's amendment doesn't make sense. While I appreciate the consideration, I ask why would I want to stay in my ADU when hosting a guest. My ADU is just 10 steps away from my house. What's the difference if I stay in my main house vs the ADU?</p> <p>I would ask for a grandfather clause or consider adding an exemption for people over 70 who reside in their homes full-time while hosting Airbnb guests. Maybe add wording that allows ADUs with private guest parking off the street, size not allowable for parties, etc. Thank you</p>
			Tiffny Barney	This ordinance is not needed. It is an unfair attack on landlords and hosts.
			Yessica Minoz	I'm house cleaning this Caine of business help me to Support my family of 4 persons two in college edge and one on elementary school, this business hi me the opportunity of be a útil in this society and get a work afther a strong sicknes like cancer,
			Zhengxun Wang	
		Other	Jyoti Drummond	<p>Good day City Council members,</p> <p>I am writing as an owner and part time resident of Malibu unincorporated la county and primary resident of Malibu. In April of 2018 my husband, Colin, became totally disabled. He has not been able to work since then. We have been renting out our primary residence in Malibu during the summer on a monthly basis when we go out of the country (to stay with family in Canada and the UK) for a few months. We rent out our home in unincorporated la county in Malibu short term for no longer than 90 days. We have no problems regulating short term rentals but if they are going to be limited to only having one rental we see no reason why you must add the "must be a primary resident" factor in the ordinance. This will take away any possible fees and occupancy taxes the county would be able to charge and we both would lose valuable and important income that keeps us surviving. We have never had any noise/nuisance issues or complaints on either of our rentals. We hope you can take away this one small requirement so we can continue to rent out our home short term for no more than 90 days so we can make ends meet. Otherwise I suppose we'd have to put the other house in my 18 year old son's name and make him the primary resident but that could also be a huge financial risk with putting that much responsibility on a teenage brain. Your best solution would be ideal. Perhaps you can add a clause that disabled persons need not be a primary persons? Thank you so much for your consideration. Jo Drummond</p>
Item Total	74			

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
72-F.		Oppose	Alan T Zorthian	I am voicing my opinion in opposition to the restrictions on short term rentals. There does not seem to be an item for that on this list. The closest one I see is this one and item 37
			Carmen G Sanchez	
			Jeremiah Small	The proposed ordinance was created to address consumption of affordable housing and nuisance party-houses caused by short term rentals. The proposed ordinance accomplishes this by imposing a de facto ban on short term rentals. This ordinance is a draconian restriction on small businesses in unincorporated LA County. It is bad for residents and bad for local businesses. Please vote no on this unwanted and unnecessary legislation.
			Juan Zhou	
		Other	Alan Eigen	I think your proposed rules are reasonable with two exceptions: 1. I support the proposed amendment. To allow hosts to live in an onsite ADU and rent out the main house. 2. The proposed cap of 90 days per year is too restrictive. Most just rent weekends. There are 4 weekends per month for a total of 8 weekend days per month. 12 months in a year. That equals 96 Friday and Saturdays in a year. That should be the minimum. It would be nice to be able to accommodate some non weekend rentals so I propose a revised cap of 120 days in a year.
		Item Total	5	
Grand Total			79	



Feb 29, 2024

Dear LA County Board of Supervisors,

The Eastside LEADS Coalition writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state’s homelessness crisis continues to worsen, it’s vital that the Board of Supervisors (the “Board”) take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County’s proposed Ordinance (the “Ordinance”) includes common-sense STR regulations that will protect unincorporated Los Angeles’ housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board’s recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

At Eastside LEADS, our mission is to secure resident control of investment and development decisions in all Eastside communities (unincorporated East LA, Boyle Heights, Lincoln Heights, and El Sereno) without displacing long-time residents.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO’s website estimates that over one million of LA County’s residents live in unincorporated parts of the County – about 10% of the population. It’s vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.⁵ As the

¹ <https://www.betterneighborsla.org/about-us>

² The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf



County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County's enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance's provisions to protect Accessory Dwelling Units ("ADU"s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority's (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County's designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County's current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region's housing supply and contribute to the increased cost of living that residents may face.

Support regional enforcement against "bait and switch." We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA's HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to

⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>



evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact Pamela Agustin, Eastside LEADS Coalition Director at pamela@eastsideleads.org .

Best,

Eastside LEADS





Feb 29, 2024

Dear LA County Board of Supervisors,

The Eastside LEADS Coalition writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state’s homelessness crisis continues to worsen, it’s vital that the Board of Supervisors (the “Board”) take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County’s proposed Ordinance (the “Ordinance”) includes common-sense STR regulations that will protect unincorporated Los Angeles’ housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board’s recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

At Eastside LEADS, our mission is to secure resident control of investment and development decisions in all Eastside communities (unincorporated East LA, Boyle Heights, Lincoln Heights, and El Sereno) without displacing long-time residents.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO’s website estimates that over one million of LA County’s residents live in unincorporated parts of the County – about 10% of the population. It’s vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.⁵ As the

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² The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf



County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County's enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance's provisions to protect Accessory Dwelling Units ("ADU"s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority's (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County's designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County's current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region's housing supply and contribute to the increased cost of living that residents may face.

Support regional enforcement against "bait and switch." We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA's HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to

⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>



evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact Pamela Agustin, Eastside LEADS Coalition Director at pamela@eastsideleads.org .

Best,

Eastside LEADS





Tuesday, December 5th 2023

Dear LA County Board of Supervisors,

The Alliance for Community Transit (ACT-LA) writes to you in support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs). As the state's homelessness crisis continues to worsen, it is critical that the Board of Supervisors take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations.

The Alliance for Community Transit – Los Angeles (ACT-LA) is a coalition of over 40 organizations, and strives to create just, equitable, sustainable transit systems and neighborhoods for all people in Los Angeles, placing the interest of low-income communities and communities of color first as we create a more sustainable region.

We support the Ordinance as a whole, and would like to highlight a few specific provisions that are critical to meeting our current housing crisis:

Protecting Rent-Restricted Units and ADUs. We support the Ordinance's provisions to protect ADUs and rent restricted units from conversion into STRs. The County's designated affordable and Section 8 housing, which is already limited in supply, should not be lessened in the interest of profits from property owners and developers. Prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County's current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will return many rental units to the market. According to current data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, through this change, up to 1,727 units could be returned to the long-term rental market. These commercial STR operations place additional strains on a region's housing supply and contribute to the increased cost of living that residents may face.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance between protecting residents across the County from future displacement with providing homeowners and renters with opportunities to utilize their homes for additional income.** Should you have any questions, please contact our Policy and Advocacy Coordinator, Marissa Ayala, at mayala@act-la.org



December 31, 2023

Dear LA County Board of Supervisors,

Pasadena Tenants Union writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs). ¹ As the state’s homelessness crisis continues to worsen, it’s vital that the Board of Supervisors (the “Board”) take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County’s proposed Ordinance (the “Ordinance”) includes common-sense STR regulations that will protect unincorporated Los Angeles’ housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board’s recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

The Pasadena Tenants Union is an all-volunteer association of tenants and allies organizing against rising rents, evictions, and gentrification. Because, as tenants, we don’t have control over our own housing, we fight together for agency over our communities and homes. We do this by being a part of the movement for tenants rights at the state, regional, and local level.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO’s website estimates that over one million of LA County’s residents live in unincorporated parts of the County – about 10% of the population. It’s vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated

¹ <https://www.betterneighborsla.org/about-us>

² The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.

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⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>



LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring 2.5 minimum wage jobs per household.⁵ As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County’s enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance’s provisions to protect Accessory Dwelling Units (“ADU”s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority’s (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County’s designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County’s current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region’s housing supply and contribute to the increased cost of living that residents may face.

Support regional enforcement against “bait and switch.” We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>



common violation of the City of LA's HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact info@pasadenatenantsunion.org

Best,

A handwritten signature in black ink that reads "Ryan Bell". The signature is written in a cursive, flowing style.

Ryan Bell

On behalf of the Pasadena Tenants Union

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

February 12, 2024

VIA Electronic Mail

Supervisor Holly J. Mitchell
500 West Temple Street, Room 866
Los Angeles, CA 90012

Dear Supervisor Mitchell,

We write in support of the County of Los Angeles' proposed Short-Term Rentals Registration Ordinance. As elected officials within your district, we recognize that short-term rental (STRs) regulations must be adopted to safeguard housing during the ongoing housing and homelessness crises.

STR regulations in unincorporated LA County will protect precious housing at this critical juncture. According to recent census data, 53.5% of LA County residents are renters.¹ Professor David Wachsmuth of McGill University found that the proliferation of STRs has caused rents to increase \$810 per year for each rental unit in the City of Los Angeles since 2015.² As a result renters are being priced out of the City of Los Angeles and look to rent in more affordable areas leading to a wave of migration across the region.

Renters in LA County, however, are already struggling to make ends meet. According to the National Low Income Housing Coalition, the hourly wage necessary to pay the rent of a typical two-bedroom apartment in unincorporated SD2 - \$2,200 per month - is \$42.31 an hour in LA County.³ Communities in your district that already struggle with STRs also report above-average housing costs.⁴

STRs are also a significant driver of the homelessness crisis. According to the Los Angeles Homeless Services Authority, in 2022 there were 23,593 individuals experiencing homelessness in Supervisor District 2, the vast majority of which were unsheltered.⁵ Residents in the City of Los Angeles have seen how short-term rentals contribute to displacement and homelessness. Professor Wachsmuth of McGill University found that commercial STRs have taken 2,500 homes off the long-term market and are responsible for more than 5,000 extra people experiencing homelessness each night in the City of Los Angeles.⁶ Similar displacement is happening County-wide, pricing families and individuals out of their homes. According to an analysis by Better Neighbors LA, there are at least 850 unhosted short-term rentals currently

¹ <https://data.census.gov/table?q=housing+in+los+angeles+county&tid=ACST1Y2021.S1101>

² http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

³ <https://nlihc.org/oor/state/ca>

⁴ Data associated with zip code 90302, unincorporated Ladera Heights, shows that the hourly wage necessary to pay rent of a typical two-bedroom apartment (\$2,200 per month) is \$42.31 an hour: <https://nlihc.org/oor/zip?code=9030>

⁵ <https://www.lahsa.org/data?id=53-homeless-count-by-la-county-supervisorial-district-2015-2022>

⁶ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

active on Airbnb in unincorporated SD2 alone. This means that at least 850 units have been removed from the housing stock just to be used as tourist accommodation.⁷ By approving the proposed regulations, you will further protect our communities across unincorporated LA County from displacement.

STRs also give rise to concerns about neighborhood character and quality of life. All around the County, residents must suddenly deal with commercial enterprises in the middle of their neighborhoods, bringing in rowdy parties, parking difficulties, high volumes of trash, loud noise, and guests that have no stake in safeguarding the community. Currently, residents have no course of action to deal with the problem. If passed, the proposed ordinance will address disruptive party houses and nuisance STRs.

The proposed ordinance will also bring the County into alignment with other cities in the region that have adopted reasonable regulations. This includes Los Angeles, West Hollywood, and Santa Monica, each of which have adopted strong regulations to protect residents and housing. Indeed, cities in your district including Carson, Compton, El Segundo, Gardena, Hawthorne, Hermosa Beach, and Inglewood have implemented specific STR restrictions much like those the Board of Supervisors are considering, such as requiring registration, banning unhosted STRs, including a primary residency requirement, protecting ADUs and rent-controlled units from conversion to STRs, and limiting the number of STRs one can operate.⁸ Others, including Culver City, Lawndale, Manhattan Beach, and Redondo Beach outright ban all STRs.⁹ Unscrupulous STR hosts with regulated units will often misrepresent their location to be in unincorporated LA County to circumvent local enforcement and take advantage of the County's lack of regulation.¹⁰ Implementing strong regulations on the County level will help enforcement in cities in your District, as well as protect the housing stock and communities of unincorporated LA County.

Amid this housing and houselessness crisis, protecting unincorporated LA County residents in your district from displacement due to STRs is an integral part of solving this regional issue. For these reasons, we urge you to pass the Short-Term Rentals Registration

⁷ Data on file with Better Neighbors LA.

⁸ Carson, Compton, El Segundo, Gardena, Hawthorne, and Inglewood all have short-term rental regulations. Carson: <https://www.codepublishing.com/CA/Carson/html/Carson09/Carson09010202.html> Compton: <https://ecode360.com/35622209> El Segundo: <https://www.elsegundo.org/government/departments/community-development/short-term-home-sharing-rental-permit-pilot-program> Gardena: <https://cityofgardena.org/wp-content/uploads/2023/09/ORD-NO-1854.pdf> Hawthorne: https://library.qcode.us/lib/hawthorne_ca/pub/municipal_code/item/title_17-chapter_17_74-17_74_020 Hermosa Beach: <https://www.hermosabeach.gov/our-government/city-departments/community-development/short-term-vacation-rentals> Inglewood: <https://www.cityofinglewood.org/1638/Short-Term-Rentals>

⁹ Culver City, Lawndale, Manhattan Beach, and Redondo Beach have banned all STRS in their jurisdiction. Culver City: <https://www.culvercity.org/Have-Your-Say/Short-Term-Rentals> Lawndale: https://library.qcode.us/lib/lawndale_ca/pub/municipal_code/item/title_17-chapter_17_48-article_iii-17_48_115 Manhattan Beach: <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/short-term-vacation-rentals> Redondo Beach: <https://www.redondobeachtourism.com/news/airbnb>

¹⁰ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

Ordinance. Should you have questions, please email Becca Ayala at rebecca@betterneighborsla.org.

Titles included for identification purposes only.

Estefany Castañeda

Centinela Valley Union High School District(Lawndale, Hawthorne, Lennox), School Board Member

Charles Davis

Compton Unified School District, Trustee

Hugo Rojas

Centinela Valley Union High School District, Board President

Alex Vargas

Mayor of Hawthorne

Freddy Puna

Culver City Councilmember

CC:

Supervisor Holly Mitchell

Isela Gracian
Pamela Leo
Caroline Torosis



January 3, 2023

Dear LA County Board of Supervisors,

The Koreatown Immigrant Workers Alliance (KIWA) writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).

[1] As the state’s homelessness crisis continues to worsen, it’s vital that the Board of Supervisors (the “Board”) take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County’s proposed Ordinance (the “Ordinance”) includes common-sense STR regulations that will protect unincorporated Los Angeles’ housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board’s recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

Founded in 1992, KIWA organizes immigrant workers in low-wage industries to transform their workplaces and communities. These individuals and their families are also struggling with housing insecurity due to both wage stagnation, wage theft, and the lack of affordable housing.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO’s website estimates that over one million of LA County’s residents live in unincorporated parts of the County – about 10% of the population. It’s vital that these residents are afforded the same housing protection that residents in other cities within the County receive. [2]

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles. [3] Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso



highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.^[4] The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.^[5] As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.^[6]

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County’s enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance’s provisions to protect Accessory Dwelling Units (“ADU”s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority’s (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County’s designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County’s current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts



operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region's housing supply and contribute to the increased cost of living that residents may face.

Support regional enforcement against "bait and switch." We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA's HSO that Better Neighbors Los Angeles has observed.^[7]

Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact Brady Collins, at brady@kiwa.org



Best,

A handwritten signature in black ink, appearing to be "BC" with a stylized flourish.

Brady Collins

Director of Research and Policy

KIWA

[1] <https://www.betterneighborsla.org/about-us>

[2] The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.

[3] http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

[4] <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>

[5] https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

[6] <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>

[7] <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>



- [1] Letter to Los Angeles City Council from Better Neighbors LA. Oct. 17th, 2023.
- [2] <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=14-1635-S10>
- [3] http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf
- [4] <https://www.huduser.gov/portal/sites/default/files/pdf/2023-AHAR-Part-1.pdf>
- [5] https://clkrep.lacity.org/onlinedocs/2014/14-0268-S13_ord_draft_02-23-2021.pdf

December 20, 2023

VIA ELECTRONIC MAIL

Supervisor Janice Hahn
500 W. Temple Street, Room 822
Los Angeles, CA 90012

RE: Los Angeles County Short-Term Rentals Registration Ordinance – SUPPORT

Dear Supervisor Hahn,

We write in support of the County of Los Angeles' proposed Short-Term Rentals Registration Ordinance. As elected officials within your district, we recognize that short-term rental (STRs) regulations must be adopted to safeguard housing during the ongoing housing and homelessness crises.

STR regulations in unincorporated LA County will protect precious housing at this critical juncture. According to recent census data, 53.5% of LA County residents are renters.¹ Professor David Wachsmuth of McGill University found that the proliferation of STRs has caused rents to increase \$810 per year for each rental unit in the City of Los Angeles since 2015.² As a result renters are being priced out of the City of Los Angeles and look to rent in more affordable areas leading to a wave of migration across the region.

Renters in LA County, however, are already struggling to make ends meet. According to the National Low Income Housing Coalition, the hourly wage necessary to pay the rent of a typical two-bedroom apartment - \$2,222 per month - is \$42.73 an hour in LA County.³ Communities in your district that already struggle with STRs also report above-average housing costs.⁴

STRs are also a significant driver of the homelessness crisis. According to the Los Angeles Homeless Services Authority, in 2022 there were 4925 individuals experiencing homelessness in Supervisor District 4, the vast majority of which were unsheltered.⁵ Residents in the City of Los Angeles have seen how short-term rentals contribute to displacement and homelessness. Professor Wachsmuth of McGill University found that commercial STRs have taken 2,500 homes off the long-term market and are responsible for more than 5,000 extra people experiencing homelessness each night in the City of Los Angeles.⁶ Similar displacement is happening County-wide, pricing families and individuals out of their homes. According to an

¹ <https://data.census.gov/table?q=housing+in+los+angeles+county&tid=ACSST1Y2021.S1101>

² http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

³ <https://nlihc.org/oor/state/ca>

⁴ Data associated with zip code 90630, unincorporated Lakewood, shows that the hourly wage necessary to pay the rent of a typical two-bedroom apartment (\$2,440 per month) is \$46.92 an hour: <https://nlihc.org/oor/zip?code=90630>

⁵ <https://www.lahsa.org/data?id=53-homeless-count-by-la-county-supervisorial-district-2015-2022>

⁶ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

analysis by Better Neighbors LA, there are at least 60 unhosted short-term rentals currently active on Airbnb in unincorporated SD4 alone. This means that at least 60 units have been removed from the housing stock just to be used as tourist accommodation.⁷ Meanwhile, over the last three decades, Los Angeles County has been home to the most overcrowded housing in the country, according to a Los Angeles Times analysis published last year.⁸ As Los Angeles residents continue to face rising housing costs and overcrowded living conditions, unhosted short-term rentals are valuable housing units currently off the market to long-term tenants or potential homeowners. By approving the proposed regulations, you will further protect our communities across unincorporated LA County from displacement.

STRs also give rise to concerns about neighborhood character and quality of life. All around the County, residents must suddenly deal with commercial enterprises in the middle of their neighborhoods, bringing in rowdy parties, parking difficulties, high volumes of trash, loud noise, and guests that have no stake in safeguarding the community. Currently, residents have no course of action to deal with the problem. If passed, the proposed ordinance will address disruptive party houses and nuisance STRs.

The proposed ordinance will also bring the County into alignment with other cities in the region that have adopted reasonable regulations. This includes Los Angeles, West Hollywood, and Santa Monica, each of which have adopted strong regulations to protect residents and housing. Indeed, cities in your district including Avalon, Long Beach, and Torrance have implemented specific STR restrictions much like those the Board of Supervisors are considering, such as requiring registration, banning all unhosted STRs, and limiting the number of STRs a single host can operate.⁹ Many others, including Cerritos, Commerce, La Habra Heights, La Mirada, Lakewood, Lomita, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, and South Gate outright ban all STRs.¹⁰ Unscrupulous STR hosts with regulated

⁷ Data on file with Better Neighbors LA.

⁸ <https://www.latimes.com/california/story/2022-10-19/packed-in-overcrowded-housing-los-angeles>

⁹ Avalon, Long Beach, and Torrance all have short-term rental regulations. Avalon:

https://hchoacatalina.org/Portals/0/Avalon%20Muni%20Code%2009-8_%20404%28f%29.pdf Long Beach:

<https://www.longbeach.gov/lbcd/enforcement/strs/> Torrance: <https://www.torranceca.gov/our-city/community-development/planning-division/permits-applications/short-term-rentals>

¹⁰ Cerritos, Commerce, La Habra Heights, La Mirada, Lakewood, Lomita, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, and South Gate have banned all STRS in their jurisdiction. Cerritos:

<https://www.codepublishing.com/CA/Cerritos/html/Cerritos22/Cerritos2240.html#22.40.260>

Commerce: https://library.municode.com/ca/commerce/codes/code_of_ordinances?nodeId=TIT5BURELI_CH5.63HOARRE La Habra Heights: <https://www.lhcity.org/325/Short-Term-Rentals> La Mirada:

<https://www.airbnb.com/help/article/2692#:~:text=Short%2Dterm%20rentals%20in%20residential,not%20permitted%20in%20La%20Mirada>. Lakewood: <https://www.lakewoodcity.org/Business/Short-term-rentals>

Lomita: https://library.municode.com/ca/lomita/codes/code_of_ordinances?nodeId=MUCO_TITXIPLZO_CH1ZO_PT3REZO_ART30REZO Palos Verdes Estates:

https://pvestates.granicus.com/Viewer.php?view_id=1&event_id=522&meta_id=60948 Rancho Palos Verdes: <https://www.rpvca.gov/987/Short-Term-Rentals> Rolling Hills:

https://library.municode.com/ca/rolling_hills/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.16REAGBUZO_17.16.020PEPRUS Rolling Hills Estates:

https://library.municode.com/ca/rolling_hills_estates/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.47SHRM RERE_17.47.020PU South Gate: https://www.cityofsouthgate.org/files/sharedassets/public/v1/business-amp-development/documents/ordinance-2020-01-cc_executed.pdf

units will often misrepresent their location to be in unincorporated LA County to circumvent local enforcement and take advantage of the County’s lack of regulation.¹¹ Implementing strong regulations on the County level will help enforcement in cities in your District, as well as protect the housing stock and communities of unincorporated LA County.

Amid this housing and houselessness crisis, protecting unincorporated LA County residents in your district from displacement due to STRs is an integral part of solving this regional issue. For these reasons, we urge you to pass the Short-Term Rentals Registration Ordinance. Should you have questions, please email Becca Ayala at rebecca@betterneighborsla.org.

Titles included for identification purposes only.

Sincerely,

Ariel Pe

Ariel Pe
Mayor of Lakewood

Maria del Pilar Avalos

Maria del Pilar Avalos
Mayor of South Gate

Daisy Lomeli

Daisy Lomeli
Mayor of Cudahy

Ana Valencia

Ana Valencia
Mayor of Norwalk

Eddie De La Riva

Eddie De La Riva
Mayor of Maywood

Karina Macias

Karina Macias
Vice Mayor of Huntington Park

Mayra Aguiluz

Mayra Aguiluz
Mayor Pro Tem of Maywood

Monica Arroyo

Monica Arroyo
Bell Councilmember

¹¹ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

Francis de Leon Sanchez

Francis de Leon Sanchez
Bell Gardens Councilmember

Elizabeth Alcantar

Elizabeth Alcantar
Cudahy Councilmember

Juan Muñoz

Juan Muñoz
Lynwood Councilmember

Eddie Martinez

Eddie Martinez
Huntington Park Councilmember

Lynda Johnson

Lynda Johnson
Cerritos Councilmember

Mireya Garcia

Mireya Garcia
Commerce Councilmember

Cassandra Chase

Cassandra Chase
Lakewood Councilmember

Melissa Ramoso

Melissa Ramoso
Artesia Councilmember

Graciela Ortiz

Graciela Ortiz
Huntington Park Councilmember

Arturo Flores

Arturo Flores
Huntington Park Councilmember

CC:

Jayme Wilson



February 1, 2024

Dear LA County Board of Supervisors,

Community Power Collective writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state’s homelessness crisis continues to worsen, it’s vital that the Board of Supervisors (the “Board”) take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County’s proposed Ordinance (the “Ordinance”) includes common-sense STR regulations that will protect unincorporated Los Angeles’ housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board’s recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

Community Power Collective’s mission is to build power with tenants, street vendors, and transit riders in communities of color to create a solidarity economy, gain community control of land and housing, and form dignified public systems to facilitate a culture of radical collective care in Boyle Heights, East Los Angeles and the Los Angeles Metropolitan area.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO’s website estimates that over one million of LA County’s residents live in unincorporated parts of the County – about 10% of the population. It’s vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most

¹ <https://www.betterneighborsla.org/about-us>

² The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>



recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.⁵ As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County’s enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance’s provisions to protect Accessory Dwelling Units (“ADU”s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority’s (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County’s designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County’s current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region’s housing supply and contribute to the increased cost of living that residents may face.

Support regional enforcement against “bait and switch.” We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA’s HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>



Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact our Director or Organizational Strategy, Carla de Paz at carla@cpcollective.org.

Best,

Community Power Collective

California State Senate

SENATOR
MARÍA ELENA DURAZO
TWENTY-SIXTH SENATE DISTRICT



CHAIR:
BUDGET SUBCOMMITTEE
NO. 5 ON PUBLIC
SAFETY, JUDICIARY,
TRANSPORTATION & LABOR
MEMBER
BUDGET & FISCAL REVIEW
ENERGY, UTILITIES
& COMMUNICATIONS
GOVERNANCE & FINANCE
JUDICIARY
LABOR, PUBLIC
EMPLOYMENT & RETIREMENT

Board of Supervisors
Los Angeles County
Kenneth Hahn Hall of Administration
500 W Temple Street
Los Angeles, CA 90012

RE: Los Angeles County Short-Term Rentals Registration Ordinance – SUPPORT

Dear Supervisors,

We write in support of the County of Los Angeles' proposed Short-Term Rentals Registration Ordinance. As elected officials within your districts that represent your constituents' interests in the California State Legislature, we recognize that local short-term rental regulations must be adopted to safeguard housing as we continue to address the housing and homelessness crisis at the state level.

In recent years, the Legislature has passed legislation intended to promote the production of housing. However, promoting the production of housing is only one part of the multipronged strategy that must be taken to truly address the affordable housing and homelessness crisis. Inherent in this strategy must be the preservation of housing precisely for housing, and not short-term rentals serving tourists. Cities like the City of Irvine understand that regulations work. In 2019, the City of Irvine completely banned short-term rentals.¹ A recent study published in the American Real Estate and Urban Economics Association Journal has found that in the City of Irvine, the enforcement of this ban on short-term rentals has contributed to a 3% decrease in long-term rents on average, or \$114 per month.² Meanwhile, the number of unhosted short-term rentals has only increased in LA County. Since 2019 the average number of unhosted short-term rentals in unincorporated LA County per month has increased 95%, now totaling over 2,800 homes taken off the long-term market throughout your districts.³ These unhosted short-term rentals have taken up double the housing stock they did just five years ago, and will continue to grow at a rapid rate if left unchecked.⁴ These housing units are now no longer available to long-

¹ <https://www.cityofirvine.org/code-enforcement/short-term-rentals>

² <https://onlinelibrary.wiley.com/doi/epdf/10.1111/1540-6229.12440>

³ Data on file with Better Neighbors LA.

⁴ Unincorporated LA County has 296,274 housing units. <https://scag.ca.gov/sites/main/files/file-attachments/unincorporated-los-angeles-county-he-0421.pdf?1620756769#&:~:text=Unincorporated%20Los%20Angeles%20County's%20housing%20stock%20consists%20of%20296%2C274,in%20the%20SCAG%20region%20overall.>

term tenants or potential homeowners. Without regulations in place, it is likely the unhosted short-term rental market will continue to cannibalize housing within unincorporated LA County.

STRs are also a significant driver of the affordable housing and homelessness crisis. According to Professor Wachsmuth of McGill University, short-term rentals have increased rents by \$810 annually and are responsible for more than 5,000 extra people experiencing homelessness each night in the City of Los Angeles.⁵ Similar displacement is likely happening County-wide, pricing families and individuals out of their homes. According to the Los Angeles Homeless Services Authority, in 2022 there 65,111 individuals experiencing homelessness throughout the County of Los Angeles, the vast majority of which were unsheltered.⁶ By approving the proposed regulations, you will further protect our communities across unincorporated LA County from future displacement and preserve housing for long-term use.

The proposed ordinance will also bring the County into alignment with other cities in the region that have adopted reasonable regulations. This includes Los Angeles, West Hollywood, and Santa Monica, each of which have adopted strong regulations to protect residents and housing. Indeed, 28 cities in your districts have implemented specific STRs restrictions much like those the Board of Supervisors are considering, such as requiring registration, banning unhosted rentals, and not allowing STRs in rent stabilized units.⁷ Across the County, 24 cities ban all STRs within at least a portion of their jurisdiction.⁸ Unscrupulous STR hosts with regulated units will often misrepresent their location to be in unincorporated LA County to circumvent local enforcement and take advantage of the County's lack of regulation.⁹ Implementing strong regulations on the County level will help enforcement in cities in your districts, as well as protect the housing stock and communities of unincorporated LA County.

Amid this housing and houselessness crisis, protecting unincorporated LA County residents in your districts from displacement due to STRs is an integral part of solving this regional issue. For these reasons, we urge you to pass the Short-Term Rentals Registration Ordinance. Should you have questions, please contact (213) 355-7600 or rebecca@betterneighborsla.org .

Sincerely,



MARÍA ELENA DURAZO
Senator, 26th District

FR

⁵ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁶ <https://www.lahsa.org/data?id=53-homeless-count-by-la-county-supervisorial-district-2015-2022>

⁷ Cities with STR regulations: Los Angeles, Baldwin Park, Monterey Park, Pomona, Carson, Compton, El Segundo, Gardena, Hawthorne, Inglewood, Agoura Hills, Beverly Hills, Hidden Hills, Malibu, San Fernando, Santa Monica, Westlake Village, West Hollywood, Avalon, Lomita, Long Beach, South Gate, Torrance, Whittier, Glendale, La Verne, and Pasadena.

⁸ Cities with STR bans within part or all of their jurisdiction: Diamond Bar, Rosemead, San Gabriel, Culver City, Hermosa Beach, Lawndale, Manhattan Beach, Redondo Beach, Calabasas, Cerritos, Commerce, La Habra Heights, La Mirada, Lakewood, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, Arcadia, Bradbury, Burbank, Claremont, Duarte, and Temple City.

⁹ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>



February 8, 2024

Dear LA County Board of Supervisors,

Fideicomiso Comunitario Tierra Libre writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state’s homelessness crisis continues to worsen, it’s vital that the Board of Supervisors (the “Board”) take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County’s proposed Ordinance (the “Ordinance”) includes common-sense STR regulations that will protect unincorporated Los Angeles’ housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board’s recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

Fideicomiso Comunitario Tierra Libre (FCTL) strives for the cultivation of space for the most vulnerable members in the neighborhood to be able to have a voice and live in what is being developed in their community. Our work focuses on creating sustainable, healthy, permanent, inclusive, stable, and community controlled neighborhoods.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO’s website estimates that over one million of LA County’s residents live in unincorporated parts of the County – about 10% of the population. It’s vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of

¹ <https://www.betterneighborsla.org/about-us>

² The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>



STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.⁵ As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County’s enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance’s provisions to protect Accessory Dwelling Units (“ADU”s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority’s (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County’s designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County’s current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region’s housing supply and contribute to the increased cost of living that residents may face.

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>



Support regional enforcement against “bait and switch.” We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA’s HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City’s enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board’s adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact FCTL Directors Roberto Garcia-Ceballos (roberto@fctl.la) and/or Vanessa Gonzalez (vanessa@fctl.la).

Best,

Fideicomiso Comunitario Tierra Libre

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>



January 6, 2024

Dear LA County Board of Supervisors,

The Glendale Tenants Union writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state's homelessness crisis continues to worsen, it's vital that the Board of Supervisors (the "Board") take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County's proposed Ordinance (the "Ordinance") includes common-sense STR regulations that will protect unincorporated Los Angeles' housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board's recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

Here in Glendale, GTU is a tenant-led organization committed to empowering tenants and supporting the residents in our city and beyond. One of our main goals is organizing to prevent rising rents, evictions, and gentrification from displacing the people living in Glendale. Because of the work we do, our union is deeply familiar with the ways in which current rent prices and the lack of affordable housing keep tenants from being able to have stable, secure places to live long term. We as GTU believe that housing is a human right, and it is important to keep the homes in LA County exactly that – homes, not an opportunity for landlords and property owners to increase their wealth by renting out houses and apartments short term. It is also important for us to stand in solidarity with the rest of the county, as we know all too well that the housing issues we see in Glendale are not unique to our city.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO's website estimates that over one million of LA County's residents live in unincorporated parts of the County – about 10% of the population. It's vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.

¹ <https://www.betterneighborsla.org/about-us>

² The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.



Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.⁵ As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County’s enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance’s provisions to protect Accessory Dwelling Units (“ADU”s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority’s (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County’s designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County’s current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region’s housing supply and contribute to the increased cost of living that residents may face.

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>



Support regional enforcement against “bait and switch.” We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA’s HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City’s enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board’s adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact our union at glendaletenantsunion@gmail.com

Best,

Glendale Tenants Union

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

Jan. 7, 2024

Dear LA County Board of Supervisors,

Pasadena For All writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs). ¹ As the state’s homelessness crisis continues to worsen, it’s vital that the Board of Supervisors (the “Board”) take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County’s proposed Ordinance (the “Ordinance”) includes common-sense STR regulations that will protect unincorporated Los Angeles’ housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board’s recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

Pasadena For All is a mutual aid group that has been doing direct outreach to the unhoused since August of 2020. During that time, the group has gathered weekly donations and supplies, supported a successful rent control campaign in Pasadena, advocated for the city to reinstate its Bad Weather Shelter and called for more funding for the city’s housing department.

California’s high-cost housing (which is especially expensive in Pasadena) is directly linked to the increasing number of people being forced to live on the street. We support any policy that helps retain housing stock and keeps lower-income Californians in their homes.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO’s website estimates that over one million of LA County’s residents live in unincorporated parts of the County – about 10% of the population. It’s vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of

¹ <https://www.betterneighborsla.org/about-us>

² The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>

STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.⁵ As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County’s enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance’s provisions to protect Accessory Dwelling Units (“ADU”s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority’s (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County’s designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County’s current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region’s housing supply and contribute to the increased cost of living that residents may face.

Support regional enforcement against “bait and switch.” We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA’s HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact pasadenaforall@gmail.com or [@pasadenaforall](https://www.instagram.com/pasadenaforall) on Instagram.

Best,

Andrew Good and Victor Suarez (and the rest of Pasadena For All)

February 8, 2024

VIA ELECTRONIC MAIL

Supervisor Kathryn Barger
500 West Temple Street, Room 869
Los Angeles, CA 90012

RE: Los Angeles County Short-Term Rentals Registration Ordinance – SUPPORT

Dear Supervisor Barger,

We write in support of the County of Los Angeles' proposed Short-Term Rentals Registration Ordinance. As elected officials within your district, we recognize that short-term rental (STRs) regulations must be adopted to safeguard housing during the ongoing housing and homelessness crises.

STR regulations in unincorporated LA County will protect precious housing at this critical juncture. According to recent census data, 53.5% of LA County residents are renters.¹ Professor David Wachsmuth of McGill University found that the proliferation of STRs has caused rents to increase \$810 per year for each rental unit in the City of Los Angeles since 2015.² As a result renters are being priced out of the City of Los Angeles and look to rent in more affordable areas leading to a wave of migration across the region.

Renters in LA County, however, are already struggling to make ends meet. According to the National Low Income Housing Coalition, the hourly wage necessary to pay the rent of a typical two-bedroom apartment - \$2,222 per month - is \$42.25 an hour in LA County.³ Communities in your district that already struggle with STRs also report above-average housing costs.⁴

STRs are also a significant driver of the homelessness crisis. According to the Los Angeles Homeless Services Authority, in 2022 there were 7,413 individuals experiencing homelessness in Supervisor District 5, the vast majority of which were unsheltered.⁵ Residents in the City of Los Angeles have seen how short-term rentals contribute to displacement and homelessness. Professor Wachsmuth of McGill University found that commercial STRs have taken 2,500 homes off the long-term market and are responsible for more than 5,000 extra people experiencing homelessness each night in the City of Los Angeles.⁶ Similar displacement is happening County-wide, pricing families and individuals out of their homes. According to an analysis by Better Neighbors LA, there are more than 500 unhosted short-term rentals currently

¹ <https://data.census.gov/table?q=housing+in+los+angeles+county&tid=ACSST1Y2021.S1101>

² http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

³ <https://nlihc.org/oor/state/ca>

⁴ Data associated with zip code 91001, unincorporated Altadena: <https://nlihc.org/oor/zip?code=91001>

⁵ <https://www.lahsa.org/data?id=53-homeless-count-by-la-county-supervisorial-district-2015-2022>

⁶ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

active on Airbnb in unincorporated SD5 alone. This means that over 500 units have been removed from the housing stock just to be used as tourist accommodation.⁷ By approving the proposed regulations, you will further protect our communities across unincorporated LA County from displacement.

STRs also give rise to concerns about neighborhood character and quality of life. All around the County, residents must suddenly deal with commercial enterprises in the middle of their neighborhoods, bringing in rowdy parties, parking difficulties, high volumes of trash, loud noise, and guests that have no stake in safeguarding the community. Currently, residents have no course of action to deal with the problem. If passed, the proposed ordinance will address disruptive party houses and nuisance STRs.

The proposed ordinance will also bring the County into alignment with other cities in the region that have adopted reasonable regulations. This includes Los Angeles, West Hollywood, and Santa Monica, each of which have adopted strong regulations to protect residents and housing. Indeed, cities in your district including Pasadena, Glendale, and La Verne have implemented specific STRs restrictions much like those the Board of Supervisors are considering, such as requiring registration, banning unhosted rentals, and not allowing STRs in rent stabilized units.⁸ Many others including Arcadia, Bradbury, Burbank, Claremont, Duarte, and Temple City outright ban all STRs.⁹ Unscrupulous STR hosts with regulated units will often misrepresent their location to be in unincorporated LA County to circumvent local enforcement and take advantage of the County's lack of regulation.¹⁰ Implementing strong regulations on the County level will help enforcement in cities in your District, as well as protect the housing stock and communities of unincorporated LA County.

Amid this housing and houselessness crisis, protecting unincorporated LA County residents in your district from displacement due to STRs is an integral part of solving this regional issue. For these reasons, we urge you to pass the Short-Term Rentals Registration Ordinance. Should you have questions, please email Becca Ayala at rebecca@betterneighborsla.org.

⁷ Data on file with Better Neighbors LA.

⁸ Glendale, La Verne, and Pasadena all have short-term rental regulations. Glendale: <https://www.glendaleca.gov/government/departments/community-development/neighborhood-services/licensing/home-sharing> La Verne: <https://www.cityoflaverne.org/DocumentCenter/View/1276/Short-Term-Rental-Permit-Information-PDF?bidId=> Pasadena: <https://www.cityofpasadena.net/planning/short-term-rental-regulations/>

⁹ Arcadia, Bradbury, Burbank, Claremont, Duarte, and Temple City have banned all STRS in their jurisdiction. Arcadia: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/OrdinanceNo2348.pdf> Bradbury: https://library.municode.com/ca/bradbury/codes/code_of_ordinances?nodeId=COOR_TITIXDECO_PTV_ZODIALLAUS_CH61R-SIMIREZODI_S9.61.010PUCH Burbank: <https://www.burbankca.gov/web/community-development/str> Claremont: <https://claremont-courier.com/latest-news/t34056city-29933/#:~:text=Short%2Dterm%20rentals%2C%20such%20as,the%20City%20Manager%20Jamie%20Earl> Duarte: https://library.municode.com/ca/duarte/codes/development_code?nodeId=ART2ZOALUSDEST Temple City: https://codelibrary.amlegal.com/codes/templecityca/latest/templecity_ca/0-0-0-35998

¹⁰ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

Titles included for identification purposes only.

Sincerely,

Victor Gordo

Victor Gordo
Mayor of Pasadena

Konstantine Anthony

Konstantine Anthony
Mayor of Burbank

Ardy Kassakhian

Ardy Kassakhian
Glendale Councilmember

Nick Schultz

Nick Schultz
Vice Mayor of Burbank

Andrea Alarcon

Andrea Alarcon
Mayor Pro Tem of Palmdale

Jess Rivas

Jess Rivas
Pasadena Councilmember

Paula Devine

Paula Devine
Glendale Councilmember and
Former Mayor

Ara Najarian

Ara Najarian
Glendale Councilmember

Dan Brotman

Dan Brotman
Mayor of Glendale

Nikki Peréz

Nikki Peréz
Burbank Councilmember

Tamala Takahashi

Tamala Takahashi
Burbank Councilmember

Michael Cacciotti

Michael Cacciotti
South Pasadena Councilmember



Jed Leano
Claremont Councilmember

CC:

Supervisor Kathryn Barger
Anish Saraiya
Tyler Cash
Roberto E. Álvarez

Jason Lyon

Jason Lyon
Pasadena Councilmember

Elen Asatryan

Elen Asatryan
Glendale Councilmember

Steve Madison

Steve Madison
Vice Mayor of Pasadena



November 16, 2023

Dear LA County Board of Supervisors,

Esperanza Community Housing (Esperanza) we strongly supports the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state's homelessness crisis continues to worsen, it's vital that the Board of Supervisors (the "Board") take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County's proposed Ordinance (the "Ordinance") includes common-sense STR regulations that will protect unincorporated Los Angeles' housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board's recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

Esperanza works with low-income communities of color, who live at the intersection of social justice issues affecting South Central Los Angeles's communities – upholding the pillars of health, public health, housing, economic justice, environmental justice, racial and immigrant justice, and supporting local arts and culture – to achieve comprehensive, long-term equitable community development in the Figueroa Corridor of South Central Los Angeles.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO's website estimates that over one million of LA County's residents live in unincorporated parts of the County – about 10% of the population. It's vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition ("NLIHC"), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC's most recent "Out of

¹ <https://www.betterneighborsla.org/about-us>

² The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>



Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring 2.5 minimum wage jobs per household.⁵ As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County’s enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance’s provisions to protect Accessory Dwelling Units (“ADU”s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority’s (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County’s designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County’s current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region’s housing supply and contribute to the increased cost of living that residents may face.

Support regional enforcement against “bait and switch.” We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA’s HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>

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Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.**

Respectfully,

A handwritten signature in black ink, appearing to read "Nancy Halpern Ibrahim", with a long horizontal flourish extending to the right.

Nancy Halpern Ibrahim
Executive Director



February 8, 2024

Dear LA County Board of Supervisors,

The Keep LA Housed Coalition writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state's homelessness crisis continues to worsen, it's vital that the Board of Supervisors (the "Board") take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County's proposed Ordinance (the "Ordinance") includes common-sense STR regulations that will protect unincorporated Los Angeles' housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board's recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

Keep LA Housed is a coalition of tenants, tenant rights advocates, public interest lawyers, and community based organizations with the goal of protecting tenants against evictions, displacement, and homelessness in the wake of the COVID-19 pandemic in the City and County of Los Angeles.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO's website estimates that over one million of LA County's residents live in unincorporated parts of the County – about 10% of the population. It's vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition ("NLIHC"), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC's most recent "Out of Reach" report found that, on average, the fair market rent for a two-bedroom in

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LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.⁵ As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County's enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

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to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact our Coalition Coordinator, Maria Lopez (maria@keeplahoused.org).

Best,

Keep LA Housed

February 7, 2024

VIA ELECTRONIC MAIL

Supervisor Lindsey Horvath
500 West Temple Street, Room 821
Los Angeles, CA 90012

RE: Los Angeles County Short-Term Rentals Registration Ordinance – SUPPORT

Dear Supervisor Horvath,

We write in support of the County of Los Angeles' proposed Short-Term Rentals Registration Ordinance. As elected officials within your district, we recognize that short-term rental (STRs) regulations must be adopted to safeguard housing during the ongoing housing and homelessness crises.

STR regulations in unincorporated LA County will protect precious housing at this critical juncture. According to recent census data, 53.5% of LA County residents are renters.¹ Professor David Wachsmuth of McGill University found that the proliferation of STRs has caused rents to increase \$810 per year for each rental unit in the City of Los Angeles since 2015.² As a result renters are being priced out of the City of Los Angeles and look to rent in more affordable areas leading to a wave of migration across the region.

Renters in LA County, however, are already struggling to make ends meet. According to the National Low Income Housing Coalition, the hourly wage necessary to pay the rent of a typical two-bedroom apartment - \$3,330 per month – is \$64.04 an hour in unincorporated Supervisorial District 3.³ Communities in your district that already struggle with STRs also report above-average housing costs.⁴

STRs are also a significant driver of the homelessness crisis. According to the Los Angeles Homeless Services Authority, in 2022 there were 13,432 individuals experiencing homelessness in Supervisor District 3, the vast majority of which were unsheltered.⁵ Residents in the City of Los Angeles have seen how short-term rentals contribute to displacement and homelessness. Professor Wachsmuth of McGill University found that commercial STRs have taken 2,500 homes off the long-term market and are responsible for more than 5,000 extra people experiencing homelessness each night in the City of Los Angeles.⁶ Similar displacement is happening County-wide, pricing families and individuals out of their homes. According to an analysis by Better Neighbors LA, there are more than 380 unhosted short-term rentals currently active on Airbnb in unincorporated SD3 alone. This means that over 380 units have been

¹ <https://data.census.gov/table?q=housing+in+los+angeles+county&tid=ACSST1Y2021.S1101>

² http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

³ <https://nlihc.org/oor/state/ca>

⁴ Data associated with zip code 90290, unincorporated Topanga: <https://nlihc.org/oor/zip?code=90290>

⁵ <https://www.lahsa.org/data?id=53-homeless-count-by-la-county-supervisorial-district-2015-2022>

⁶ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

removed from the housing stock just to be used as tourist accommodation.⁷ By approving the proposed regulations, you will further protect our communities across unincorporated LA County from displacement.

STRs also give rise to concerns about neighborhood character and quality of life. All around the County, residents must suddenly deal with commercial enterprises in the middle of their neighborhoods, bringing in rowdy parties, parking difficulties, high volumes of trash, loud noise, and guests that have no stake in safeguarding the community. Currently, residents have no course of action to deal with the problem. If passed, the proposed ordinance will address disruptive party houses and nuisance STRs.

The proposed ordinance will also bring the County into alignment with other cities in the region that have adopted reasonable regulations. This includes Los Angeles, West Hollywood, and Santa Monica, all within your district and each of which have adopted strong regulations to protect residents and housing. Indeed, other cities in your district including Agoura Hills, Beverly Hills, and Malibu have implemented specific STR restrictions much like those the Board of Supervisors are considering, such as requiring registration, banning unhosted rentals, and capping the number of days rented per calendar year.⁸ Others, including Calabasas, outright ban all STRs.⁹ Unscrupulous STR hosts with regulated units will often misrepresent their location to be in unincorporated LA County to circumvent local enforcement and take advantage of the County's lack of regulation.¹⁰ Implementing strong regulations on the County level will help enforcement in cities in your District, as well as protect the housing stock and communities of unincorporated LA County.

Amid this housing and houselessness crisis, protecting unincorporated LA County residents in your district from displacement due to STRs is an integral part of solving this regional issue. For these reasons, we urge you to pass the Short-Term Rentals Registration Ordinance. Should you have questions, please email Becca Ayala at rebecca@betterneighborsla.org.

⁷ Data on file with Better Neighbors LA.

⁸ Agoura Hills, Beverly Hills, and Malibu, West Hollywood, and Santa Monica all have short-term rental regulations.

Agoura Hills: <https://www.agourahillscity.org/department/community-development/planning/short-term-rental>

Beverly Hills: <https://www.beverlyhills.org/departments/communitydevelopment/shorttermvacationrentals/>

Malibu: <https://www.malibucity.org/DocumentCenter/View/27338/Malibu-Ordinance-No-468---Short-Term-Rental-Enforcement-Ordinance>

Santa Monica: <https://www.smgov.net/uploadedFiles/Departments/PCD/Permits/Home%20share%20O-2616.pdf>

West Hollywood: https://library.qcode.us/lib/west_hollywood_ca/pub/municipal_code/item/title_19-article_19_3-chapter_19_36-19_36_331

Santa Monica: <https://www.smgov.net/uploadedFiles/Departments/PCD/Permits/Home%20share%20O-2616.pdf>

⁹ Calabasas has banned all STRS in their jurisdiction.

[https://mcclibraryfunctions.azurewebsites.us/api/ordinanceDownload/16235/881610/pdf?forceDownload=true#:~:text=\(A\)%20The%20Calabasas%20Municipal%20Code,Calabasas%20Municipal%20Code%20Section%2017%20](https://mcclibraryfunctions.azurewebsites.us/api/ordinanceDownload/16235/881610/pdf?forceDownload=true#:~:text=(A)%20The%20Calabasas%20Municipal%20Code,Calabasas%20Municipal%20Code%20Section%2017%20).

¹⁰ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

Sincerely,

Titles for identification purposes only.

Deborah Klein Lopez

Deborah Klein Lopez
Agoura Hills Councilmember

Penny Sylvester

Penny Sylvester
Agoura Hills Councilmember

Maria Solorio

Maria Solorio
San Fernando Councilmember

Joel Fajardo

Joel Fajardo
San Fernando Councilmember

Gleam Davis

Gleam Davis
Santa Monica Councilmember

John M. Erickson PhD

John M. Erickson, PhD
Mayor of West Hollywood

Sepi Shyne

Sepi Shyne
West Hollywood Councilmember

Jesse Zwick

Jesse Zwick
Santa Monica Councilmember

Chelsea Byers

Chelsea Byers
Vice Mayor of West Hollywood

CC:

Supervisor Lindsey Horvath
John Leonard



Pomona Economic Opportunity Center Pomona Day Labor Center

December 6, 2023

Dear LA County Board of Supervisors,

Pomona Economic Opportunity Center is writing to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state's homelessness crisis continues to worsen, it's vital that the Board of Supervisors (the "Board") take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County's proposed Ordinance (the "Ordinance") includes common-sense STR regulations that will protect unincorporated Los Angeles' housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board's recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

The Pomona Economic Opportunity Center (PEOC) is a worker center with a grassroots organizing model. Our mission is to empower low-wage, immigrant workers in Pomona and across the Inland Empire. Our methods of empowerment for our immigrant community members and workers include economic, political and social development and sustainability. As PEOC, we provide opportunities for day laborers, household workers and other low-wage, immigrant workers to find safe work at a fair wage, to organize and advocate for themselves in relation to policies that impact their lives, to obtain new trades and skills that improve their employability and quality of life, and to improve the overall conditions for all immigrant workers.

To achieve these goals the PEOC engages in a variety of activities including labor rights education and employer mediation, job development, health and safety trainings, improving access to resources in the local community, coalition building, providing educational opportunities on workers rights and immigrant rights, vocational trainings, identifying training opportunities in work and language skills, development of strong workers and community leaders through organizing and trainings, immigration document preparation and advocacy to promote or change policies that impact low-wage immigrant workers. In addition to its main site in Pomona, the PEOC organizes day laborers among informal street corners in the Inland Empire in the cities of Rancho Cucamonga, San Bernardino, Corona, Moreno Valley and Riverside.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO's website estimates that over one million of LA County's residents live in unincorporated parts of the

¹ <https://www.betterneighborsla.org/about-us>



Pomona Economic Opportunity Center

Pomona Day Labor Center

County – about 10% of the population. It’s vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are more likely to rent than own.⁴ The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.⁵ As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County’s enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

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Pomona Economic Opportunity Center Pomona Day Labor Center

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Support regional enforcement against "bait and switch." We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA's HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact Debra Mendez at dmendez@pomonadaylabor.org.

Best,

Debra Mendez

Debra Mendez

Housing Justice Coordinator, Pomona Economic Opportunity Center

Pronouns: She/Her Pronombre personal: Élla

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>



February 06, 2024

Dear LA County Board of Supervisors,

LA Voice writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state's homelessness crisis continues to worsen, it's vital that the Board of Supervisors (the "Board") take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County's proposed Ordinance (the "Ordinance") includes common-sense STR regulations that will protect unincorporated Los Angeles' housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board's recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

LA Voice is a multi-racial, multi-faith community organization that awakens people to their own power, training them to speak, act, and work together to transform our County into one that reflects the dignity of all people.

We believe all people have power and a voice. Every day we amplify that power by uniting diverse faith voices to stand-up for what their communities need, winning changes that improve the lives of all Angelenos.

LA Voice's organizing presence is based throughout LA County, across 5 county supervisorial districts and 28 strategic cities. Throughout the county, we have 65 congregations, 26 with teams, and 17 of them with teams that can deliver.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO's website estimates that over one million of LA County's residents live in unincorporated parts of the County – about 10% of the population. It's vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

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Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance’s provisions to protect Accessory Dwelling Units (“ADU”s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority’s (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County’s designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County’s current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>



County by 9%. These commercial STR operations place additional strains on a region's housing supply and contribute to the increased cost of living that residents may face.

Support regional enforcement against "bait and switch." We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA's HSO that Better Neighbors Los Angeles has observed.⁷ Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.**

Best,

Angel Mortel

Lead Organizer, LA Voice

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

Making Housing and Community Happen

1628 N. Garfield Ave
Pasadena CA 91104
Makinghousinghappen.org



December 21, 2023

Dear LA County Board of Supervisors,

Making Housing and Community Happen (MHCH) writes to you in strong support of the proposed amendments to County Code, Title 7 to regulate short-term rentals (STRs).¹ As the state’s homelessness crisis continues to worsen, it’s vital that the Board of Supervisors (the “Board”) take the necessary precautions to protect the housing supply in unincorporated Los Angeles County from conversion to tourist accommodations. The County’s proposed Ordinance (the “Ordinance”) includes common-sense STR regulations that will protect unincorporated Los Angeles’ housing stock and residents; and hold accountable both hosts and platforms for any infractions of the Ordinance. An ordinance regulating STRs is also consistent with the Board’s recent efforts to further protections for renters, as renters are some of those most at risk of displacement from STRs.

Making Housing & Community Happen equips congregations, community leaders, and neighbors with practical tools needed to transform their communities to end homelessness, and to stabilize the cost of housing through education, advocacy, organizing, and advisement.

According to Better Neighbors Los Angeles, data indicates that there are 3,780 STR listings advertised on Airbnb across unincorporated LA County. The County CEO’s website estimates that over one million of LA County’s residents live in unincorporated parts of the County – about 10% of the population. It’s vital that these residents are afforded the same housing protection that residents in other cities within the County receive.²

There exists a substantial body of research on STRs indicating that short-term rentals contribute to increased rent and home prices, which can often lead to displacement of residents and community members. For example, Professor David Wachsmuth at McGill University estimates that STRs have raised rents for the average renter by \$810 per year in the City of Los Angeles.³ Furthermore, an article by Luisa Godinez-Puig and Jorge Gonzalez-Hermoso highlights the clear equity concern associated with rising rents, as Black and Latinx residents are

¹ <https://www.betterneighborsla.org/about-us>

² The City of Los Angeles, City of West Hollywood, and City of Santa Monica all have STR regulations. The City of Los Angeles is in the process of further strengthening current regulations.

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

more likely to rent than own.⁴ The removal of units from the long-term market at the hands of STRs undoubtedly disproportionately impacts Black and Latinx residents across unincorporated LA County. According to the National Low Income Housing Coalition (“NLIHC”), 54% of households in LA County were renter households from 2017-2021. Furthermore, NLIHC’s most recent “Out of Reach” report found that, on average, the fair market rent for a two-bedroom in LA County costs \$2,222 per month, requiring a 2.5 minimum wage jobs per household.⁵ As the County works to strengthen tenant protections, regulating short-term rentals must be viewed as another necessary tool needed to safeguard housing.⁶

While we support the Ordinance as a whole, we would like to express our strong support for a few specific provisions:

Holding Platforms Accountable. Vital to the success of any STR regulation is that hosting platforms are held accountable for facilitating the booking of illegal STRs. The Ordinance allows the County to impose fines of up to one thousand dollars per violation per day on hosting platforms for completing illegitimate booking transactions. The County’s enforcement of this provision of the Ordinance will create incentive for platforms to ensure that their users are operating in compliance with local regulations.

Protecting Rent-Restricted Units and ADUs. We additionally support the Ordinance’s provisions to protect Accessory Dwelling Units (“ADU”s) and rent restricted units from conversion into STRs. The Los Angeles Homeless Services Authority’s (LAHSA) 2023 Annual Homeless Count found that homelessness in LA County increased by 9% over the past year. The County’s designated affordable and Section 8 housing, which is already limited in supply, should not be cannibalized so that property owners and developers may make more money. Additionally, prohibiting the use of ADUs as STR accommodation is ultimately consistent with the County’s current ADU regulations and with statewide goals of increasing housing supply that inspired the legalization of ADUs.

Eliminating Commercial Operators. Restricting hosts to only one STR within unincorporated LA County will undoubtedly return several rental units to the market, in instances where hosts operate several STRs. According to our data, of the 2,053 hosts that advertise STRs on Airbnb in unincorporated parts of the County, 643 of them advertise multiple STR listings. Thus, if hosts were restricted to operating one STR, up to 1,727 units could be returned to the long-term rental market, reducing the STR population in unincorporated LA County by 9%. These commercial STR operations place additional strains on a region’s housing supply and contribute to the increased cost of living that residents may face.

Support regional enforcement against “bait and switch.” We believe that implementation of strong STR regulations across unincorporated parts of LA County will help to eliminate a common violation of the City of LA’s HSO that Better Neighbors Los Angeles has observed.⁷

⁴ <https://www.urban.org/urban-wire/abundance-short-term-rentals-who-wins-and-who-loses>

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

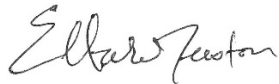
⁶ <https://www.latimes.com/california/story/2023-07-11/la-county-new-renter-protections>

⁷ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

Because the HSO similarly requires that hosts register their STRs, prohibits hosts from operating several STRs within the City, and restricts the use of housing units subject to the Rent Stabilization Ordinance (RSO) as STRs, unscrupulous hosts have begun to purport that their STRs are located outside of the City of LA. For example, a host with a property in Hollywood may advertise their unit as being located in West Hollywood, a host in Venice may advertise their unit as being in Marina del Rey, and so on. The City's enforcement software is not designed to evaluate STRs that do not appear to be within City limits on hosting platforms, so hosts are able to falsify the address on the platform and message guests the correct address for their stay upon booking. We are hopeful that the implementation of regulations in unincorporated parts of the County will help to address this violation.

The STR regulations before the Board is an opportunity for the Board to take another step in protecting and preserving housing in unincorporated LA County. **We support the Board's adoption of this ordinance, as it reaches a balance of protecting residents across the County from future displacement due to STRs and providing homeowners and renters with opportunities to use their homes for extra income as necessary.** Should you have any questions, please contact Bert Newton, 626-993-7958, bert@makinghousinghappen.org.

Best,

A handwritten signature in black ink, appearing to read "Elbert Newton". The signature is fluid and cursive, with the first name "Elbert" being more prominent than the last name "Newton".

Elbert (Bert) Newton
Organizer, Making Housing and Community Happen

September 22, 2023

VIA ELECTRONIC MAIL

Supervisor Hilda L. Solis
500 West Temple Street, Room 856
Los Angeles, CA 90012

RE: Los Angeles County Short-Term Rentals Registration Ordinance – SUPPORT

Dear Supervisor Solis,

We write in support of the County of Los Angeles' proposed Short-Term Rentals Registration Ordinance. As elected officials within your district, we recognize that short-term rental regulations must be adopted to safeguard housing during the ongoing housing and homelessness crisis.

Regulations for short-term rentals (STRs) in unincorporated LA County will protect precious housing at this critical juncture. According to recent census data, 53.5% of LA County residents are renters.¹ Professor David Wachsmuth of McGill University found that the proliferation of STRs has caused rents to increase \$810 per year for each rental unit in the City of Los Angeles since 2015.² As a result renters are becoming priced out of the City of Los Angeles and look to rent in more affordable areas leading to a wave of migration across the region.

Renters in LA County, however, are already struggling to make ends meet. According to the National Low Income Housing Coalition, the hourly wage necessary to pay the rent of a typical two-bedroom apartment - \$2,222 per month - is \$42.25 an hour in LA County.³ Communities in your district that have reported issues with short term rentals come in above the average. For instance, Hacienda Heights FMR cost is \$2,320 per month necessitating an hourly wage of \$44.62 an hour.⁴

Short-term rentals are also a significant driver of the homelessness crisis. Professor Wachsmuth found that commercial STRs have taken 2,500 homes off the long-term market and are responsible for more than 5,000 extra people experiencing homelessness each night in the City of Los Angeles.⁵ Similar displacement is happening County-wide, pricing families and individuals out of their homes. According to an analysis by Better Neighbors LA, there are more than 600 unhosted short-term rentals currently active on Airbnb in unincorporated SD1 alone. This means that over 600 units have been removed from the housing stock just to be used as

¹ <https://data.census.gov/table?q=housing+in+los+angeles+county&tid=ACSST1Y2021.S1101>

² http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

³ <https://nlihc.org/oor/state/ca>

⁴ Data associated with zip code 91745, unincorporated Hacienda Heights: <https://nlihc.org/oor/zip?code=91745>

⁵ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

tourist accommodation.⁶ By approving the proposed regulations, you will further protect our communities across unincorporated LA County from displacement.

The proposed ordinance will also bring the County into alignment with other cities in the region that have adopted reasonable regulations. This includes Los Angeles, West Hollywood, and Santa Monica, each of which have adopted strong regulations to protect residents and housing. Indeed, cities in your district have implemented specific restrictions on short-term rentals much like those the Board of Supervisors are considering, such as requiring registration, banning unhosted rentals, and not allowing short-term rentals in rent-protected units.⁷ Many others outright ban all short-term rentals.⁸ Unscrupulous short-term rental hosts with rental units in cities with regulations often list their units to appear to be in unincorporated LA County to circumvent restrictions and take advantage of the County's lack of regulation.⁹ Implementing strong regulations on the County level will help enforcement in cities in your District, as well as protect the housing stock and communities of unincorporated LA County.

Amid this housing and houselessness crisis, protecting unincorporated LA County residents in your district from displacement due to short-term rentals is an integral part of solving this regional issue. For these reasons, we urge you to pass the Short-Term Rentals Registration Ordinance. Should you have questions, please email Becca Ayala at rebecca@betterneighborsla.org.

Sincerely,

Titles included for identification purposes only.



Scarlet Peralta
Mayor Pro Tem of Montebello



Brian Calderón Tabatabai
Mayor Pro Tem of West Covina

⁶ Data on file with Better Neighbors LA.

⁷ Baldwin Park, Monterey Park and Pomona all have STR regulations implemented. Baldwin Park: <https://www.baldwinpark.com/docssidemenu/public-notice/ordinances/1924-ordinance-1447-rso/file>; Monterey Park: [http://www.montereypark.ca.gov/1466/Starting-a-Business-in-Monterey-Park#:~:text=Short%2DTerm%20Rental%20Permits,%2C%20HomeAway%2C%20and%20similar%20websites](http://www.montereypark.ca.gov/1466/Starting-a-Business-in-Monterey-Park#:~:text=Short%2DTerm%20Rental%20Permits,%2C%20HomeAway%2C%20and%20similar%20websites;); Pomona: <https://www.dailybulletin.com/2023/01/31/pomona-hits-short-term-rentals-with-new-regulations/>

⁸ Diamond Bar, Rosemead, and San Gabriel have banned all STRS in their jurisdiction. Diamond Bar: <https://www.diamondbarca.gov/Faq.aspx?QID=314>; Rosemead: https://library.municode.com/ca/rosemead/ordinances/code_of_ordinances?nodeId=900458; San Gabriel: [https://www.sangabrielcity.com/1341/Frequently-Asked-Questions#:~:text=Short-term%20rentals%20\(anything%20less,term%20rental%20or%](https://www.sangabrielcity.com/1341/Frequently-Asked-Questions#:~:text=Short-term%20rentals%20(anything%20less,term%20rental%20or%20)

⁹ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

Jessica Ancona

Jessica Ancona
Mayor of El Monte

Angie Jimenez

Angie Jimenez
Montebello Council Member

Adele Andrade Stadler

Adele Andrade Stadler
Alhambra Council Member

Sasha Renée Pérez

Sasha Renée Pérez
Vice Mayor of Alhambra

Andrew Chou

Andrew Chou
Mayor of Diamond Bar

Sandra Armenta

Sandra Armenta
Rosemead Council Member

Emmanuel J. Estrada

Emmanuel J. Estrada
Mayor of Baldwin Park

Sal Melendez

Sal Melendez
Montebello Council Member

Gloria Olmos

Gloria Olmos
Mayor of South El Monte

Stan Liu

Stan Liu
Mayor Pro Tem of Diamond Bar

Manny Acosta

Manny Acosta
South El Monte Council Member

Martín Herrera

Martín Herrera
Mayor Pro Tem of El Monte

Henry Lo

Henry Lo
Monterey Park Council Member

CC:

Louisa Ollague
Tamela Omoto-Frias

Hello Supervisors,

My name is Esme and I am with Los Angeles Tenants Union. I urge the Board of Supervisors to pass the Short-Term Rentals Registration Ordinance because at least 54 of the 88 incorporated cities across LA County have some form of regulations on short-term rentals. However, residents in unincorporated LA County have virtually no form of relief from the impacts of short-term rentals due to minimal regulations. I support the Short-Term Rentals Registration Ordinance because it will help protect residents in unincorporated LA County from the threat of displacement due to short-term rentals. Please take this important step to preserve housing for long-term residents and approve the Short-Term Rentals Registration Ordinance. Thank you,

Esme Germaine Reyna



HUGO SOTO-MARTINEZ
Councilmember, Thirteenth District

February 12, 2024

Re: LA County Short-Term Rental Ordinance

Dear LA County Board of Supervisors,

I write in support of the County of Los Angeles' proposed Short-Term Rentals Registration Ordinance. As the Councilmember for the Thirteenth District in the City of Los Angeles, I recognize that short-term rental (STRs) regulations must be adopted to safeguard housing during the ongoing housing and homelessness crises.

STR regulations in unincorporated LA County will protect precious housing at this critical juncture. According to recent census data, 53.5% of LA County residents are renters.¹ Professor David Wachsmuth of McGill University found that the proliferation of STRs has caused rents to increase \$810 per year for each rental unit in the City of Los Angeles since 2015.² As a result renters are being priced out of our districts and look to rent in more affordable areas leading to a wave of migration across the region.

Renters in LA County, however, are already struggling to make ends meet. According to the National Low Income Housing Coalition, the hourly wage necessary to pay the rent of a typical two-bedroom apartment - \$2,222 per month - is \$42.73 an hour in LA County.³ Communities in your district that already struggle with STRs also report above-average housing costs.⁴

STRs are also a significant driver of the homelessness crisis. According to the Los Angeles Homeless Services Authority, in 2023 there were 75,518 individuals experiencing homelessness across LA County.⁵ Residents in the City of Los Angeles have seen how short-term rentals contribute to displacement and homelessness. Professor Wachsmuth of McGill University found that commercial STRs have taken 2,500 homes off the long-term market and are responsible for more than 5,000 extra people experiencing homelessness each night in the City of Los Angeles.⁶ Similar displacement is likely happening County-wide, pricing families and individuals out of their homes. According to an analysis by Better Neighbors LA, there are 2,744 unhosted short-term rentals currently active on Airbnb in

¹ <https://data.census.gov/table?q=housing+in+los+angeles+county&tid=ACST1Y2021.S1101>

² http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

³ <https://nlihc.org/oor/state/ca>

⁴ Data associated with Los Angeles County: https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁵

<https://www.lahsa.org/news?article=927-lahsa-releases-results-of-2023-greater-los-angeles-homeless-count#:~:text=LOS%20ANGELES%20%E2%80%93%20The%202023%20Greater,to%20an%20estimated%2046%2C260%20people>

⁶ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf



HUGO SOTO-MARTINEZ
Councilmember, Thirteenth District

unincorporated Los Angeles County. This means that 2,744 units have been removed from the housing stock just to be used as tourist accommodation.⁷ By approving the proposed regulations, you will further protect our communities across unincorporated LA County from displacement.

STRs also give rise to concerns about neighborhood character and quality of life. All around the County, residents must suddenly deal with commercial enterprises in the middle of their neighborhoods, bringing in rowdy parties, parking difficulties, high volumes of trash, loud noise, and guests that have no stake in safeguarding the community. Currently, residents have no course of action to deal with the problem. If passed, the proposed ordinance will address disruptive party houses and nuisance STRs.

The proposed ordinance will also bring the County into alignment with other cities in the region that have adopted reasonable regulations. This includes Los Angeles, West Hollywood, and Santa Monica, each of which have adopted strong regulations to protect residents and housing.⁸ Unscrupulous STR hosts with regulated units will often misrepresent their location to be in unincorporated LA County to circumvent local enforcement and take advantage of the County's lack of regulation.⁹ Implementing strong regulations on the County level will help enforcement in cities across LA County, as well as protect the housing stock and communities of unincorporated LA County.

Amid this housing and houselessness crisis, protecting unincorporated LA County residents from displacement due to STRs is an integral part of solving this regional issue. For these reasons, I urge you to pass the Short-Term Rentals Registration Ordinance.

Sincerely,

Hugo Soto-Martinez

Los Angeles City Councilmember for the Thirteenth District
200 N Spring St, Ste. 480, Los Angeles, CA 90012

⁷ Data as of December 2023. On file with Better Neighbors LA.

⁸ City of Los Angeles: http://clkrep.lacity.org/onlinedocs/2014/14-1635-S2_ORD_185931_07-01-19.pdf ; City of West Hollywood:

<https://www.weho.org/city-government/city-departments/community-safety/neighborhood-and-business-safety/business-licensing-and-permits/home-sharing-license> ; City of Santa Monica:

<https://www.smgov.net/Departments/PCD/Permits/Short-Term-Rental-Home-Share-Ordinance/>

⁹ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>