



**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 |
| 6. | | Favor | Noah Suarez-Sikes | <p>Better Neighbors LA is submitting the attached public comment letter supporting the Short-Term Rentals Registration Ordinance for you all to review and consider when voting on conforming changes to Title 22 at this 9/16 meeting. We would like to convey that we strongly support the proposed changes made to Title 22 to comply with the Short-Term Rentals Registration Ordinance that you all unanimously passed earlier this year. Regulating short-term rentals represents a step forward in protecting communities and long-term housing stock throughout unincorporated LA County. For these reasons, we ask the Board of Supervisors to approve the proposed changes to Title 22.</p> |
| | | Oppose | Isela Lopez | <p>As many times this issue has been heard TTC ,County Council, and the Board it's the same ordinance and recommendations that has been provided to the supervisor with no acknowledgement of residents and seniors that rent a room or space in their home " not a detached unit. I will say if this goes through TTC does not have the right to deny a homeowner with a room in their primary residence a business license if they choose not to have all their neighbors of what goes on in their single home dwelling.</p> <p>The board needs to come up with one system for county offices, such as the environmental office, TTC, Public Health, TTC, and the cannabis management office. All these offices that you have assigned to create and take advice from their recommendation do not align with constitutional federal law and state law. Each office has different consequences for different behaviors for social groups , not aligning with county codes, for people with low income , people of different races, homeowners and small business,, and other people that face economic hardship. It is unfortunate that these rules and policies on these ordinances are based upon are people and self interest groups that do not know the poor quality of life and thinking that this TTC and Regional planning will fix it is not living in reality but in profits for developers. IA better system needs to be created to hold these county offices that the LA board of supervisors assign to create ordinances , penalties , fines, punishment. The system the board has now is very racial and corporate motivated by rezoning and creating ways to eliminate the Latino/a because universities, social justice self interest groups, and developers want the control of unincorporated areas.</p> <p>I could only speak from living in an unincorporated district, and I have seen firsthand employees having their own self-interest in massaging the outcome of ordinances and analysis. Thank you for considering my concerns.</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

| Agenda # | Relate To | Position | Name | Comments |
|--|-----------|---------------|-------------|--|
| The following individuals submitted comments on agenda item: | | | | |
| 6. | | Oppose | Jason Carmi | <p>Dear Board of Supervisors,</p> <p>I do not oppose the ordinance generally but on a specific matter: the prohibition of Accessory Dwelling Unit(ADU)s as Short-Term Rentals. I believe this provision will disenfranchise large families whose property of Primary Residence contains an ADU often used by visiting extended family. The provision prevents those from the economic opportunity afforded by those who can stay in their ADU while renting out the Primary Residence on the property.</p> <p>Not only that, but the current ordinance creates an incentive which may be contrary to the purpose of the ordinance: persons who can afford to purchase a large residence with an ADU for the purpose of living in the ADU while renting out the Primary Residence without any restrictions -- 7.96.040(D) would afford them the opportunity to the near-exclusive right to offer Short-Term Rentals both for single nights and without a limited number of nights in a calendar year.</p> <p>If a purpose of the ordinance is to maintain neighborhood character, this may in fact do the opposite, encouraging wealthier individuals to seek out properties for the purpose of producing this additional income, while either denying that economic opportunity to families whose interests align with the purpose of the ordinance or forcing them to over-occupy their ADU so that they can rent out the Primary Residence on the property.</p> <p>I ask the Board to reconsider the exemption for use the ADUs for Short-Term Rentals, that the use of ADUs should be subject to the same -- if not fewer -- restrictions as a Hosted Stay in which the owner resides in the ADU while renting the Primary Residence.</p> <p>I also ask the Board to reconsider how each use as a Short-Term Rental of a portion of their Primary Residence, of an ADU, and of the Primary Residence while staying in an ADU on the property differ, that each may create unintended incentives or restrictions which conflict with the Board's intentions and goals of the ordinance.</p> <p>I thank you for your time and consideration in this matter.</p> <p>Sincerely, Jason Carmi</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

| The following individuals submitted comments on agenda item: | | | | |
|--|-----------|---------------|----------------|---|
| Agenda # | Relate To | Position | Name | Comments |
| 6. | | Oppose | Maria M | The whole thing is confusing. You had so many changes notify when it is the date to get a license for a room I rent under 30 days , I'm a senior and because the board created rules so people that stay over 30 days can live for free. I have to have my constitutional rights violated because I don't have money to fight The board and county offices need to get their act together . |
| | | | Monisha Parker | <p>Dear Board of Supervisors,</p> <p>I hope this letter finds you well. I am writing to express my support for strengthening the Short-Term Rentals (STR) Title 22 Ordinance Amendment in Los Angeles County. The growing popularity of short-term rentals has brought various benefits to our economy but has also raised significant concerns that need to be comprehensively addressed.</p> <p>To ensure that our communities benefit from STRs while maintaining their quality of life and character, I propose the following strategies:</p> <p>1. Clear Definitions and Regulations</p> <ul style="list-style-type: none"> • Explicit Definitions: It is critical to establish precise definitions for short-term rentals, making distinctions between owner-occupied and non-owner-occupied properties. • Permit Requirements: STRs should be required to obtain a special permit, which includes rigorous criteria to ensure responsible operation and community alignment. <p>2. Cap on Rentals</p> <ul style="list-style-type: none"> • Limit the Number of STRs: Implementing a cap on STRs in certain neighborhoods will safeguard against overtourism and the degradation of community character. • Zoning Restrictions: Zoning laws should delineate areas suitable for STRs, maintaining the integrity of residential neighborhoods. <p>3. Enforcement Mechanisms</p> <ul style="list-style-type: none"> • Robust Enforcement: Allocating resources for stringent monitoring and enforcement is vital. This includes penalties for non-compliance to ensure adherence to the ordinance. • Mandatory Reporting: Requiring STR operators to furnish rental statistics will enhance transparency and accountability. <p>4. Community Involvement</p> <ul style="list-style-type: none"> • Neighborhood Input: Establishing channels for residents to express concerns will allow for meaningful community input in decision-making about |



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

STRs.

- Advisory Committees: Form committees comprising community members, neighborhood associations, and STR operators to oversee compliance and recommend necessary amendments.

5. Education and Resources

- Information Campaigns: Educational initiatives for both hosts and guests on compliance rules and best practices will foster positive relations within the community.
- Resource Availability: Providing accessible information for property owners will facilitate responsible STR operations.

6. Impact Assessments

- Conduct Studies: Regularly assessing the impact of STRs on housing markets, community dynamics, and local businesses will help refine policies as needed.
- Adapt Policies Based on Findings: Utilizing study outcomes to inform necessary regulatory adjustments is essential for effective governance.

7. Taxation and Fees

- Establish Fair Fees: A clear framework for licensing fees that mirrors the administrative costs associated with permitting and compliance monitoring will ensure sustainability.
- Tourism Tax Allocation: Taxes collected from STR operations should be allocated to support local communities, particularly for public services and affordable housing.

8. Collaboration with Platforms

- Partner with Rental Platforms: Establishing collaborative ties with platforms like Airbnb and Vrbo to share data will enhance compliance monitoring.
- Automatic Reporting: Implementing agreements for these platforms to report unregistered rentals will be a proactive measure in enforcement.

9. Reviews and Sunset Clauses

- Scheduled Reviews: Regular reviews of STR regulations in line with community feedback will allow for continuous improvement and adaptation.
- Sunset Clauses: Including sunset clauses necessitating periodic evaluations will ensure regulations do not become outdated.

10. Sustainability Considerations

- Sustainable Practices: Encouraging STRs to adopt sustainable practices will not only benefit the environment but can also enhance community pride and support.

| | | | | |
|--------------------|--|-------------------|----------|---|
| | | | | <p>By implementing these approaches, we can ensure that the STR regulations not only benefit visitors to Los Angeles County but also preserve and enhance the quality of life for our residents. I urge the Board to consider these strategies seriously in the upcoming discussions about the STR Title 22 Ordinance Amendment.</p> <p>Thank you for your attention to this matter and for your ongoing commitment to the well-being of our communities. Sincerely, Monisha Parker</p> |
| | | Item Total | 5 | |
| Grand Total | | | 5 | |



September 1, 2023

Dear LA County Board of Supervisors

We write 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.

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.

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.⁵ 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

⁵ <https://www.betterneighborsla.org/s/082022-Enforcement-Report-FINAL.pdf>

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 rebecca@betterneighborsla.org.

Best,

Better Neighbors LA
Los Angeles Alliance for a New Economy (LAANE)
UNITE HERE! Local 11
Keep Neighborhoods First
Strategic Actions for a Just Economy (SAJE)
Thai Community Development Center (Thai CDC)
Clergy & Laity United for Economic Justice (CLUE)
Coalition for Economic Survival (CES)

From: [ExecutiveOffice](#)
To: [PublicComments](#)
Cc: [Giron, Salene](#)
Subject: FW: Septemebr 17 agenda 6: Short-Term Rental Ordinance Amendment
Date: Friday, September 13, 2024 4:25:21 PM

The following correspondence is being forwarded to you for your review and handling.

KATHERINE MEDINA
CUSTOMER SERVICE CENTER
EXECUTIVE OFFICE
BOARD OF SUPERVISORS

From: Sandie City Terrace <sparra93@gmail.com>
Sent: Friday, September 13, 2024 8:28 AM
To: ExecutiveOffice <ExecutiveOffice@bos.lacounty.gov>; Rehman, Waqas <WRehman@bos.lacounty.gov>; Third District <ThirdDistrict@bos.lacounty.gov>; Holly J. Mitchell <HollyJMitchell@bos.lacounty.gov>; Supervisor Janice Hahn (Fourth District) <fourthdistrict@bos.lacounty.gov>; Barger, Kathryn <Kathryn@bos.lacounty.gov>
Cc: eastlaqualityoflife@yahoo.com; Mike Jones <eastlaadvocate@yahoo.com>; Kristie Hernandez <kristiehz@yahoo.com>; Mike Martinez <debtfreesince2010@yahoo.com>; Tony DeMarco <westernloan@aol.com>; Maria Morales <Chuy6280@gmail.com>; gemuscisela@yahoo.com; Senator Durazo <senator.durazo@senate.ca.gov>; Marisela villar <Marisela.Villar@asm.ca.gov>; Wendy Carrillo <wendy@wendycarrillo.com>
Subject: Septemebr 17 agenda 6: Short-Term Rental Ordinance Amendment

CAUTION: External Email. Proceed Responsibly.

Good morning Los Angeles Board of Supervisors,

I am writing to let you know about my concerns regarding the public hearing on the short-term ordinance amendment to County Code Title 22 planning and zoning on September 17 agenda item 6. Specifically, I am troubled by the exclusion of the coastal unincorporated from the recommendation of regional planning. This omission appears to unfairly discriminate against the Latino/a community, which has historically been marginalized in terms of generational wealth. The Latino/a community has voiced their opposition to this exclusion, advocating for equal opportunities for seniors and low-income homeowners to operate short-term rentals and rent a room to make ends meet.

It is important to ensure that county policies are consistent with those administrative voices governing business licenses for street vendors and businesses. Currently, the board has two different policies; Businesses and

Street vendors; REAP program for a homeowner that has a roommate in their home and for homeowners who rent more than 2 units, without violating constitutional rights I know this because the original recommendation violated constitutional rights of homeowners having a roommate that assist in making ends meet due to high inflation and multiple new fees and taxes. The same should apply moving forward in finalizing the Short Term Rental for seniors and individuals renting a space in which they reside to make ends meet.

I've been involved since the beginning of this ordinance and I have witnessed individuals that rent space to make ends meet and should not be included with STR of homes owned by corporations. It's clear that the board of supervisors, TTC, and Regional planning did not include any input from people renting space in their own homes where they reside 24 hours in their home to make ends meet.

Concerns of Los Angeles County Administrative [TTC Analysis](#) and Regional Planning recommendation as follows:

- The Fourteenth Amendment's Due Process Clause **guarantees procedural due process**, meaning that government actors must follow certain procedures before they may deprive a person of a protected life, liberty, or property interest.
- A Due Process Clause is found in both the Fifth and Fourteenth Amendments to the United States Constitution, which prohibit the deprivation of "life, liberty, or property" by the federal and state governments, respectively, without due process of law. TTC by sending notices to everyone in the block of homeowners' personal affairs violates the constitution. **The TTC argues and if approved by the board states that the reason for these polices is to protect the quality of life, that why the fees and liens on homes for violations; however, the board conflicts with its Los Angeles Board motions by creating its own rules by violating the ruling by the U.S. Supreme Court which provides state and local officials the definitive authority to implement and enforce policies to clear unsafe encampments from our**

streets. And the Governor Newsom's executive order. Further county offices conflict with TTC offices, which is also a county office currently we have 10 illegal marijuana shops and District 1 and have to go through due process, however, TTC does not. Make it make sense in a lawful manner?

<https://ttc.lacounty.gov/wp-content/uploads/2024/05/STR-Terms-and-FAQ-5.1.2024.pdf>



-
- Clarity regarding the fees and violations associated with short-term rentals raises questions about due process and constitutional rights. I urge you to consider the implications of this amendment on the Latino/a families community and to ensure that all residents are treated fairly under the law - no exclusion to unincorporated areas anywhere "coastal area", because it leaves the possibility to have policies for two different generational wealth and races for diversity and inclusion I request that the coastal program and other unincorporated areas being proposed to be excluded because more time is needed must be included in the September 17 decision by the board to eliminate bias policies for different ethnicities. Based on the TTC letter the coastal program would have a plan intact after 1-2 years of implementing a policy to other unincorporated areaa. Thus, the STR proposed regulations outreach has been going on in community meetings and hearings since 2019 it's 2024 so policies should be intact by now for those that reside in the unincorporated coastal area or any other unincorporated area that is being proposed to be excluded from the proposed STR hearing on September 17, 2024. <https://ttc.lacounty.gov/wp-content/uploads/2024/05/STR-Terms-and-FAQ-5.1.2024.pdf>
- Clarity of Administrative due process for low-income homeowners moving to business license and due process under the constitution, do the people in unincorporated areas have a choice to select which process they want to govern their rights? **Cheveron overruling 2023**. In which a group of people were just tired of being abused by

the government to pay more fees. Roman Martinez, who argued the case on behalf of one of the fishing companies, applauded the decision. "By ending **Chevron** deference," he said in a statement, "the Court has taken a major step to preserve the separation of powers and shut down unlawful agency overreach. Going forward, judges will be charged with interpreting the law faithfully, impartially, and independently, without deference to the government. This is a win for individual liberty and the Constitution," Further, Roberts concluded, "it thus remains the responsibility of the court to decide whether the law means what the agency says." Roberts rejected any suggestion that agencies, rather than courts, are better suited to determine what ambiguities in a federal law might mean. Even when those ambiguities involve technical or scientific questions that fall within an agency's area of expertise, Roberts emphasized, "Congress expects courts to handle technical statutory questions" – and courts also have the benefit of briefing from the parties and "friends of the court." **County employees and the LA Board are not judges in interpreting state and federal laws.**

- . Any regulations put in place must be in line with constitutional principles, including the right to due process and privacy. There is no wording of due process in the court of law in the analysis by TCC or Recommendation of Regional Planning.
- **If this ordinance moves forward where do the funds allocate for a yearly charge of \$914.00 and daily tax 12% taxes from unincorporated areas? The funds should not go to salaries and third-party agencies.**

Lastly, please do not have all your donors, non-profit groups & socialist groups, that donate to your campaign and which are given state and county funds to place their opinion when they do not even reside in the unincorporated area. It looks like a circus and demonstrates David and Goliath's doctrine.

I will upload on the portal under public comments.

Thank you for your attention to this matter.

sandie

Resident in Unincorporated Area

----- Forwarded message -----

From: **Executive Office, L.A. County Board of Supervisors** <BOSEXEC@subscriptions.lacounty.gov>

Date: Thu, Sep 12, 2024 at 3:02 PM

Subject: Agenda Spotlight - September 17, 2024 Board Meeting

To: <sparra93@gmail.com>

[Translate](#)

SpotlightHeader



Key topics and links to the agenda for the Los Angeles County Board of Supervisors meeting - September 17, 2024

[here](#)

Participation_3



**WATCH THE
MEETING
HOW TO
PARTICIPATE
SUBMIT PUBLIC
COMMENT ONLINE**

View information being

shared from your computer
or mobile device

[bos.lacounty.gov/
Live-Broadcast](https://bos.lacounty.gov/Live-Broadcast)

youtube.com/c/LACountyBOS

To Listen By Telephone Only:
(877) 873-8017
Access Code:
111111 (English) **222222** (Spanish)

For call-in information,
access the agenda below

[Meeting Agenda](#)

[PublicComment.bos.
lacounty.gov](https://PublicComment.bos.lacounty.gov)

(Note the agenda item number
and Board meeting date on
your correspondence)

The County of Los Angeles recognizes that we occupy land originally and still inhabited and cared for by the Tongva, Tataviam, Serrano, Kizh, and Chumash Peoples. We honor and pay respect to their elders and descendants -- past, present, and emerging -- as they continue their stewardship of these lands and waters. Learn more: [LA County Land Acknowledgement](#)

KEY AGENDA TOPICS



SET MATTERS

- Report on the County's Implementation of the People Experiencing Homelessness Missions (Set Matter 1)
- Report on Continuum of Care for Mental Health and Substance Use Disorder Beds (Set Matter 2)



PUBLIC HEARING

- Hearing on the Short-Term Rentals Ordinance Amendment, County Code, Title 22 - Planning and Zoning, Project No. PRJ2023-002077 ([Item 6](#))



ADMINISTRATIVE MATTER

- Ratification of Proclamation of Local Emergency for the Bridge Fire ([Item 7](#))

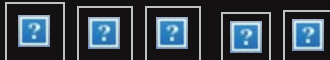


POLICY PRESENTATIONS

- Report on Initiatives to Protect Los Angeles County Residents from Extreme Heat ([Item 8](#))
- Report on the Progress of Enhancing Stabilization Supports for Foster Youth (Item 9)
- Report on Implementing Proposition 1 in Los Angeles County ([Item 10](#))

[Full Board Agenda](#)

Connect with us @LACountyBOS



[Executive Office of the Board of Supervisors](#)

500 W. Temple St, Los Angeles, CA 90012

Email: pio@bos.lacounty.gov

Phone: [\(213\) 974-1411](tel:(213)974-1411)

[Manage Subscriptions & Unsubscribe](#)