

Correspondence Received

			The following individuals submitted comments on agenda item:			
Agenda #	Relate To	Position	Name Comments Device Vine Posters pood more information about their rights following wildfires. We also			
6.		Favor	Dawn King	Renters need more information about their rights following wildfires. We also need protections against evictions and price gouging.		
			Doktor N Musk	Federal Funding match to deploy Tesla Robovan as communal Tiny Homes. Up to 11 residents per Van??. Entry and exit managed by rental scan and retinal verification.		
				On the ground at LA Convention Center, we found it impossible to access? ANY help without an ID??. Eye??? scans?? prevent, lifting off, without verification.		
		Oppose	Alex Dobbs	I'm a resident of LA County, and I oppose the emergency motion as drafted. Removing key regulations on short-term rentals will likely take even more housing units off the long-term market, that could otherwise go to displaced victims of the fires. They could also significantly raise rents on Fire victims will need long-term rentals to live in, and this emergency order will incentivize landlords to enter the short-term rental market instead of providing long-term housing to fire victims. I'm also worried that unscrupulous landlords and hosts will take advantage of this order to price-gouge fire victims on short-term rentals, or use the order as cover to mass-evict tenants for profit. I'm asking the Board to limit the rental of short-term rentals in the County to those who need it most: residents of LA County displaced because of the fires. This will ensure that the people that need housing the most at this time get that housing. I urge you to amend this emergency order to include this requirement.		

MEMBERS OF THE BOARD

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

As of: 1/22/2025 9:00:11 AM



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			The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments			
6.		Oppose	Alex Scott	Item 6: OPPOSE! I am a resident in LA county, and a tenant. I am writing to speak out strongly against Item 6 on this agenda. For one, the tenant protections here are completely inadequate – this crisis is affecting tenants across the county in so many ways. I am glad that the county is moving to protect tenants who are sheltering people that have been displaced, but we need so much more – we need a rent freeze, an eviction moratorium that applies to ALL LA County tenants, and we need to seize all vacant units to house everybody who has been forced onto the streets. What's worse is that the county has decided to pair these meager protections with actions that are actively insulting and harmful to tenants. Deregulating short-term rentals in LA County would have been a terrible move before the wildfires. But to do it after so many people have lost their homes and belongings, and are facing price-gouging landlords, is unconscionable. If the Board passes this motion, it will open up the floodgates to allow landlords to convert all the buildings they own into Airbnbs, which will drive more people onto the streets at the worst possible moment. It will allow the same people gouging rents on vacant apartment units to have another avenue to profit off of this disaster. It will make our housing crisis worse. If the Board passes this motion, they will be choosing to side with greed and with the wealthy few over everyone else in the county. It's exactly the wrong thing to do at this moment, and should never have been suggested in the first time. The LA County Board of Supervisors needs to vote down this measure, and it needs to listen to its constituents and go back to the drawing board. Pass a rent freeze, pass a universal eviction moratorium, and commandeer every vacant unit so that everyone who has lost their home or had to evacuate has a place to stay.			
			Alison Klurfeld	Item 6 OPPOSE: Preserve Long-Term Rentals for Fire Victims lâ??m a resident of LA County, and I oppose the emergency motion as drafted. Removing key regulations on short-term rentals will likely take even more housing units off the long-term market, that could otherwise go to displaced victims of the fires. They could also significantly raise rents on Fire victims will need long-term rentals to live in, and this emergency order will incentivize landlords to enter the short-term rental market instead of providing long-term housing to fire victims. Iâ??m also worried that unscrupulous landlords and hosts will take advantage of this order to price-gouge fire victims on short-term rentals, or use the order as cover to mass-evict tenants for profit. lâ??m asking the Board to limit the rental of short-term rentals in the County to those who need it most: residents of LA County displaced because of the fires. This will ensure that the people that need housing the most at this time get that housing. I urge you to amend this emergency order to include this requirement.			

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6.	6.		Andy Oliver	Please do not fiddle with the already-flawed STR ordinance in Los Angeles.Removing these protections could take key housing units off the market for people displaced by fires, and allow greedy landlords and hosts to profiteer off a natural disaster.				
			Chris Tilly	As a resident of LA County and a professor of Urban Planning at UCLA, I am writing to strongly urge you to limit any expansion of short-term rentals to actual victims of the recent fires. Broader relaxation of STR regulations will result in long-term units being taken off the market, with the perverse effect of raising rents overall and making it _harder_ for fire victims to secure new housing.				
			Dale E Turner	Don't be a dick! Protect the long termers!				
			Hayley Marcus	Short term rentals have destroyed neighborhoods / real neighbors - no one lives wants to live next-door to a motel! And now more than ever we need these spaces for the real community the real neighbors the real neighborhood				
			Hnak Aaron	As a third generation mom and pop property owner in the Los Angeles area. I have seen firsthand how certain restrictions impair the property owner or landlords ability to keep up with inflating annual costs related to operating successfully. I firmly oppose the counsel members proposal to halt rent increases until January 2026, specifically those properties that are subject to the increases set forth by the city of Los Angeles and LAHD under the Rent Stabilization Ordinance. A return to COVID-era tenant protections would be an overreach. The proposal will put a strain on ethical property owners who oppose price gouging, are willing to work with their tenants keeping their best interests in mind and understand that we all are in this unfortunate circumstance together and need to work towards a solution that is best for all parties involved. Thank you				

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			The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments			
6.		Oppose	Jessica Durrum	Please see attached letter. LAANE writes to you in strong opposition of Item 6, Rental Protections and Short-Term Rentals Resolution Following Proclamation of Existence of a Local Emergency for the January 2025 Windstorm and Critical Fire Events, as written. While rental protections are an unalloyed good, the emergency resolution as written would in fact open up unincorporated LA County to rampant speculation by unscrupulous hosts and landlords, and could deprive fire victims of the long-term rentals that they will need in order to recover from the devastating effects of the January fires. Removing STR protections could also increase already sky-high rents, further harming residents affected by the fires. We urge the supervisors to amend this resolution to limit those short-term rentals in unincorporated Los Angeles County solely to Los Angeles County residents displaced by the fires and those assisting in the recovery, as Beverly Hills and Santa Monica have recently done, to ensure that this policy helps residents recover, rather than result in unintentional consequences. This common-sense amendment would keep tenants from being evicted, and safeguard access to housing units for fire victims.			
			Judy Branfman	Please amend the motion so that the relaxed STR regulations apply only to Los Angeles County residents whose homes were lost in the fires. Otherwise, landlords are sure to exploit it and reduce long-term rentals. Such reductions will greatly harm neighborhoods.			
			Judy Pang	Dear Supervisor Hahn, I urge you to vote No on loosening restrictions on STRs for over a yr under an emergency motion. STRs remove long-term units from the market and are known to raise rental prices. This is the opposite of what LA needs right now, with so many people needing housing due to burned and damaged homes. Please do not support this measure. thank you			
			Katherine King	Please amend the motion so that the relaxation of STR regulations applies only to Los Angeles County residents. Otherwise, many landlords are likely to exploit it and reduce long-term rentals in many neighborhoods. This will greatly harm those neighborhoods			
			Kurt Petersen	Do not worsen our housing shortage - maintain the short term rental regulations!			

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			The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments			
6.		Oppose	Larry Gross	I'm writing regarding the motion to ease Short Term Rental restrictions that's coming before the Board today and to strongly urge you to oppose it. This will only make our housing crisis worse in the face of the fire catastrophe we additionally face. It will serve as incentive for landlords to get out existing tenants, either through legal or illegal means, in order to get higher rents. What we need is an emergency eviction moratorium and rent freeze, not this. Given the rent gouging that is going on and the lack of enforcement of the Governor's order, every tenant is at risk due to unscrupulous landlords trying to exploit the impact of the fire disaster.			
			Marie Kennedy	Families are going to need a place to rent longterm if their house or rental unit was destroyed in the fires. Please don't encourage shorterm rentalsthis is not what most displaced families need. And, short term rentals are destabilizing for our neighborhoods and raise the price of long term rentals.s			
			Maura ONeill				
			Miriam Cantor	Too many people have lost their homes to the fires. Don't let greed make more people homeless.			
			Rhiannon Fenton				
			Stacey Incardone	Stacey Incardone			
			Taj Lalwani	Save long-term rentals for fire victims!			
			Tal Levy				
		Other	Iris Craige	Please see attached.			
			Jennifer Gutierrez				
			Monisha Parker	To address the issue of rental protections and the regulation of short-term rentals following a local emergency proclamation—such as one resulting from a windstorm and critical fire events—it's important to follow a structured approach. Here's a general guide on how to proceed: Step 1: Understand the Emergency Proclamation Review the Proclamation: Familiarize yourself with the specifics of the local emergency proclamation related to the January 2025 windstorm and critical fire events. This document will outline the scope of the emergency and any immediate implications for rental properties and short-term rental regulations. Step 2: Identify Rental Protection Measures			
				Tenant Protections: Determine what laws or regulations are in place for tenant protections during emergencies, such as:			

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	Item Total	26	
	Item Total	26	Step 6: Monitor the Situation Ongoing Evaluation: Keep track of how the emergency measures are being implemented and whether they effectively protect renters and regulate short-term rentals. Advocate for adjustments where necessary. Step 7: Prepare for Future Emergencies Create a Plan: Develop a contingency plan outlining how to address rental protections and short-term rental resolutions in future emergencies. Engage community members and local policymakers in this preparedness effort. Conclusion Effectively managing rental protections and short-term rentals in the wake of a local emergency requires a collaborative approach involving understanding current regulations, advocating for necessary protections, and engaging with community stakeholders. Always consult with legal experts or local officials for specific guidance tailored to your area.
			Step 5: Communicate with Stakeholders Engage Local Authorities: Work with local government officials to ensure clear communication about rental protections and regulations for short-term rentals. Educate Community Members: Disseminate information to landlords and tenants about their rights and responsibilities during an emergency.
			- Utility shut-off protections. Landlord Responsibilities: Understand the obligations landlords have in emergency situations, including maintaining safe living conditions and compliance with health and safety codes. Step 3: Review Local Ordinances on Short-Term Rentals Local Laws: Check local ordinances governing short-term rentals, particularly any mechanisms in place to suspend or regulate these rentals during local emergencies. Look for: - Licensing requirements. - Limits on the number of rental properties allowed. - Restrictions or bans on short-term rentals in designated emergency zones. Step 4: Implement or Advocate for Additional Measures Temporary Restrictions: If not already in place, advocate for temporary restrictions on new short-term rentals in areas impacted by the windstorm and fire events to ensure local housing availability for displaced residents. Support for Displaced Residents: Encourage the local government to provide support services for those displaced by emergencies, such as access to temporary housing.
ALIFORNA			- Eviction moratoriums Rent control measures.

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January 20, 2025

Los Angeles County Board of Supervisors 500 West Temple Street Room 383 Los Angeles, CA 90012

RE: Rental Protections and Short-Term Rentals Resolution Following Proclamation of Existence of a Local Emergency for the January 2025 Windstorm and Critical Fire Events (25-0522)

Dear Honorable Chair Barger and Supervisors,

Better Neighbors LA (BNLA) writes to you regarding the proposed short-term rental (STR) resolution following the proclamation existence of a local emergency for the January 2025 Windstorm and Critical Fire Events. Better Neighbors LA is a coalition of tenants, housing activists, and community members working to curb illegal short-term rental activity with the intent to protect long-term housing. We conduct data analysis and research on the short-term rental industry and its impact on affordable housing.

We are concerned that the Short-Term Rental Resolution as drafted will not directly benefit residents displaced by the windstorm and fires or those assisting in the recover. We recommend the Board amend the second provision of the resolution to limit short-term rentals to only those displaced by the fires and windstorms as well as those assisting in the recovery. We recommend amending the resolution to ensure that those displaced by the fires as well as those assisting in the recovery get access to the short-term housing they need.

The Board of Supervisors engaged in a multi-year long community engagement process to establish short-term rental regulations within unincorporated Los Angeles County. Since 2019, unhosted STR listings in unincorporated LA County have grown by 132%, taking 2,800 homes off the long-term market. After years of engagement, the Board passed the Short-Term Rentals Registration Ordinance which went into effect on October 7, 2024. This ordinance includes strong provisions intended to protect even more long-term housing from turning into short-term rentals, particularly affordable housing. The ordinance includes a primary residence requirement, creates a STR registration program, sets a cap of 90 nights an unhosted rental may be rented per year, and prohibits STRs in rent-restricted primary residences and ADUs. Through these regulations, the ordinance prioritizes housing for long-term renters and homeowners to combat

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¹ https://www.betterneighborsla.org/

displacement and gentrification. This ordinance is essential to protecting vital housing stock in unincorporated LA County from being converted into tourist accommodations. Amending the emergency resolution to only those displaced by the January 2025 Windstorm and Critical Fire Events will protect housing stock by ensuring the intent of the ordinance remains intact for STRs and those who benefit are residents most impacted at this time.

Furthermore, this recommendation will prevent unscrupulous STR operators from exploiting the suspended regulations. Unfortunately, we have already seen operators taking advantage of a disaster situation in unincorporated Los Angeles. Airbnb claims to have cracked down on price gouging;² however, our findings make it clear that their efforts are not working. We found hosts in every supervisorial district that are currently price gouging. Hosts may be choosing to increase their prices manually, or they may be using a feature of Airbnb called Smart Pricing, which automatically adjusts the listing price based on demand and may have increased prices with the surge in demand from the fire evacuations.³ Airbnb notes the Smart Pricing feature may be suspended during emergencies,⁴ but our examples below demonstrate that price gouging continues despite the declaration of a local emergency. Whether Airbnb is allowing hosts to manually increase their prices above 10% or the Smart Pricing feature is doing it automatically, price gouging is happening on Airbnb.

To analyze price gouging on Airbnb across the Supervisorial Districts, we used data scraped from Airbnb on January 4, 2025, before the fires, and compared it to data scraped from Airbnb on January 17, 2025, after the emergency proclamation. According to our analysis, approximately 337 short-term rental listings in unincorporated Los Angeles County have increased their price by more than 10% between January 4th and January 17th, 2025. We also checked some listings for the most recent listings price as of January 20, 2025. Below is an analysis of a few listings in each supervisorial district, all of which demonstrate extreme examples of price gouging over 10 percent.

Supervisorial District 1

In SD1, the Airbnb host "Jeff" has two listings, both of which demonstrate price gouging. Jeff, who has been hosting for 6 years and lives in Irvine, has a total of 19 listings on Airbnb. For two of those listings located in Rosemead, we found extreme examples of price gouging, where the listings prices were nearly doubled between January 4 and January 20.

² https://skift.com/2025/01/16/airbnb-cracks-down-on-price-gouging-during-la-fires/

³ https://www.airbnb.com/help/article/1168

⁴ https://www.airbnb.com/help/article/2571

⁵ Data on file from Inside Airbnb, https://insideairbnb.com/

The table below illustrates the listings prices for each date and the percentage by which the price increased for each listing.

Listing URL	Price on 1/4/2025	Price on 1/17/2025	% Price Increase Pre vs. Post Fire	Price on 1/20/2025	% Price Increase 1/4/2025 to 1/20/2025
https://www.airbnb.c om/rooms/12610732 99183832108	\$132	\$198	50%	\$248	88%
https://www.airbnb.c om/rooms/12385049 13966296886	\$182	\$269	48%	\$374	105%

Supervisorial District 2

Again, we see a similar pattern in SD4, where hosts "Giselle and Jon" have five listings in Marina Del Rey, including the unincorporated area, that skyrocketed in price after the fires. Their listing prices increase not only between January 4 and 17, but between the 17 and the 20, which leads to all the listings having a total increase in nightly rate of over 70%, making these units progressively less accessible for evacuees.

	Price on	Price on	% Price Increase Pre vs Post	Price on	% Price Increase 1/4/2025 to
Listing URL	1/4/2025	1/17/2025	Fire	1/20/2025	1/20/2025
https://www.airbnb.c om/rooms/13097803 11585247288	\$993	\$1,799	81%	\$1,710	72%
https://www.airbnb.c om/rooms/63256759 5658325696	\$269	\$449	67%	\$803	199%
https://www.airbnb.c om/rooms/10267071 84634919883	\$287	\$421	47%	\$643	124%
https://www.airbnb.c om/rooms/71643966 8413201124	\$287	\$418	46%	\$521	82%
https://www.airbnb.c om/rooms/72027645 6974219262	\$287	\$386	34%	\$501	75%

Supervisorial District 3

In Topanga, host "Dahabada," has six listings, four of which we were able to verify are price gouging. Each of these four listing prices shot up from January 4 to January 17, ranging from a 32% increase to a 151% increase in the nightly rate. And the prices continue to rise as we see in other districts, one of them now listed at over 200% the nightly rate from early January.

Listing URL	Price on 1/4/2025	Price on 1/17/2025	% Price Increase Pre vs. Post Fire	Price on 1/20/2025	% Price Increase 1/4/2025 to 1/20/2025
https://www.airbnb.c om/rooms/99519471 2590454517	\$39	\$98	151%	\$124	218%
https://www.airbnb.c om/rooms/74837195 7160298474	\$101	\$168	66%	\$199	97%
https://www.airbnb.c om/rooms/66430961 1750944550	\$93	\$124	33%	\$159	71%
https://www.airbnb.c om/rooms/65559028 1122480749	\$516	\$682	32%	\$915	77%

Supervisorial District 4

Again, we see a similar pattern in SD4, where the host "Elijah" has a listing in Long Beach with monthly rates that rose steeply after the fires. The listing's rates more than doubled between January 4 and January 20, from \$300 to \$664. This listing represents both price gouging and unaffordable short-term housing.

Listing URL	Price on 1/4/2025	Price on 1/17/2025	% Price Increase Pre and Post Fire	Price on 1/20/2025	% Price Increase 1/4/2025 to 1/20/2025
https://www.airbnb.c om/rooms/12225323 01268166938	\$300	\$600	100%	\$664	121%

Supervisorial District 5

Close to the site of the Eaton fire, BNLA found listings with increases well above the 10% cap. In Pasadena, we identified one host, "Andy," who has five listings in Pasadena. Andy's listings all initially increased in price 39% or more from early January to January 16. The listing prices then increased again between January 17 and 20. Ultimately, Andy's listing prices for all five listings increased over 250%.

Listing URL	Price on 1/4/2025	Price on 1/17/2025	% Price Increase Pre vs. Post Fire	Price on 1/20/2025	% Price Increase 1/4/2025 to 1/20/2025
https://www.airbnb.c om/rooms/20379946	\$100	\$159	59%	\$387	287%
https://www.airbnb.c om/rooms/61769716 1392342682	\$90	\$139	54%	\$330	267%
https://www.airbnb.c om/rooms/11669846 64799285240	\$100	\$149	49%	\$375	275%
https://www.airbnb.c om/rooms/62100419 9656440831	\$100	\$139	39%	\$364	264%
https://www.airbnb.c om/rooms/61936475 8132642645	\$100	\$139	39%	\$364	264%

Given what we are seeing with price gouging across the County, BNLA urges the Board to limit the suspension of STR regulations to STRs that are providing housing directly to those displaced by the January 2025 Windstorm and Critical Fire Events. This will ensure that tourists do not inhabit the housing that is desperately needed for LA County residents. Though we do not support all the actions taken by the Beverly Hills City Council in their recently adopted Emergency Short Term Rental Urgency Ordinance, we believe they took an important step to ensure that the STRs currently being exempt from typical regulations are prioritized for those directly impacted by the recent disaster.⁶

Though the Short-Term Rentals Resolution aims to help victims of the recent windstorm and critical fire events, it does not take precautions to ensure that these victims are the ones to benefit from the suspension of STR regulations. We urge the Board of Supervisors to amend the second provision of the resolution to limit short-term rentals to only those displaced by the fires and windstorm, who need it most. Should you have any questions, please contact Maura O'Neill at maura@betterneighborsla.org.

Sincerely,

/s/ Randy Renick

⁶ Beverly Hills City Council January 16, 2025 Special Meeting: https://beverlyhills.org/1519/Emergency-Short-Term-Rentals



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

January 21, 2025

Dear LA County Board of Supervisors,

Clergy and Laity United for Economic Justice (CLUE) writes to you in strong opposition of Item 6, Rental Protections and Short-Term Rentals Resolution Following Proclamation of Existence of a Local Emergency for the January 2025 Windstorm and Critical Fire Events, as written. While rental protections are an unalloyed good, the emergency resolution as written would in fact open up unincorporated LA County to rampant speculation by unscrupulous hosts and landlords, and could deprive fire victims of the long-term rentals that they will need in order to recover from the devastating effects of the January fires. Removing STR protections could also increase already sky-high rents, further harming residents affected by the fires. We urge the supervisors to amend this resolution to limit those short-term rentals in unincorporated Los Angeles County solely to Los Angeles County residents displaced by the fires and those assisting in the recovery, as Beverly Hills and Santa Monica have recently done, to ensure that this policy helps residents recover, rather than results in unintentional consequences. This common-sense amendment would keep tenants from being evicted, and safeguard access to housing units for fire victims.

CLUE brings together clergy and lay leaders of all faiths with the marginalized, the unheard, and the least protected—low-wage workers—in the cause of a just economy that works for everyone, not just those at the top. This mission leads us to grave concern over LA's housing crisis, a crisis only worsened by the recent fires.

More than 12,000 structures have been destroyed by the recent windstorms and fires. As thousands of residents look to relocate or rebuild, it is imperative existing housing units are preserved for those impacted so they can remain in the region they love while they navigate this difficult time. According to Better Neighbors LA, data indicates that there are currently 4,424 STR listings advertised on the Airbnb platform across unincorporated LA County. 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. Reports already indicate that landlords of long-term units have engaged in price gouging following the fires. It is likely the same is occurring for short-term rentals.

¹https://www.latimes.com/california/story/2025-01-16/mapping-los-angeles-damage-from-the-eaton-and-palisades-fires-altadena-pasadena

² Data on file with Better Neighbors LA. Inside Airbnb: https://insideairbnb.com/los-angeles/

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

⁴https://www.torched.la/the-spreadsheet-brigade-thats-keeping-las-rental-market-from-exp loding/

Last year, the Board passed the Short-Term Rentals Registration Ordinance, a balanced measure intended to preserve long-term housing from conversion into tourist serving short-term rentals run by corporate hosts. However, the specific protections this emergency order would suspend from that Ordinance are all necessary to protect tenants and fire victims from unscrupulous actors seeking to profit from the natural disasters of the past few weeks. Removing the one-STR-per-natural person cap as proposed in the emergency resolution would allow landlords or hosts to mass-convert units into more profitable short-term rentals at the expense of fire victims looking for long-term shelter. Likewise, allowing ADUs to be used as STRs and removing the cap on unhosted stays incentivizes holding whole-unit rentals open for tourists, rather than use them to house displaced families. As our community begins to rebuild, it is important that as many housing units as possible are preserved for those impacted by the fires.

For these reasons, we urge the Board of Supervisors to amend this emergency resolution to require that short-term rental guests be only those displaced by the January 2025 windstorms and fires as well as those assisting in the recovery. This amendment would ensure this resolution benefits those most in need at this time. Should you have any questions, please contact our executive director, the Rev. Jennifer Gutierrez at jgutierrez@cluejustice.org.

Sincerely,

Rev. Jennifer Gutierrez

Executive Director

⁵ https://ttc.lacounty.gov/wp-content/uploads/2024/05/Short-Term-Rental-Ordinance.pdf



Los Angeles Alliance for a New Economy 464 Lucas Ave., Suite 202 Los Angeles California, 90017

January 21, 2025

Dear LA County Board of Supervisors,

LAANE writes to you in strong opposition of Item 6, Rental Protections and Short-Term Rentals Resolution Following Proclamation of Existence of a Local Emergency for the January 2025 Windstorm and Critical Fire Events, as written. While rental protections are an unalloyed good, the emergency resolution as written would in fact open up unincorporated LA County to rampant speculation by unscrupulous hosts and landlords, and could deprive fire victims of the long-term rentals that they will need in order to recover from the devastating effects of the January fires. Removing STR protections could also increase already sky-high rents, further harming residents affected by the fires. We urge the supervisors to amend this resolution to limit those short-term rentals in unincorporated Los Angeles County solely to Los Angeles County residents displaced by the fires and those assisting in the recovery, as Beverly Hills and Santa Monica have recently done, to ensure that this policy helps residents recover, rather than result in unintentional consequences. This common-sense amendment would keep tenants from being evicted, and safeguard access to housing units for fire victims.

The Los Angeles Alliance for a New Economy (LAANE) is an organizing and advocacy institution committed to economic, environmental, and racial justice. For the last 30 years, we have bridged community and labor power to win policies that improve the lives of working families throughout LA County. Our vision is to help build a new economy rooted in good jobs, thriving communities, and a healthy environment for all.

More than 12,000 structures have been destroyed by the recent windstorms and fires. As thousands of residents look to relocate or rebuild, it is imperative existing housing units are preserved for those impacted so they can remain in the region they love while they navigate this difficult time. According to Better Neighbors LA, data indicates that there are currently 4,424

 $^{^{1}\,\}underline{\text{https://www.latimes.com/california/story/2025-01-16/mapping-los-angeles-damage-from-the-eaton-and-palisades-fires-altadena-pasadena}$

STR listings advertised on the Airbnb platform across unincorporated LA County.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 Reports already indicate that landlords of long-term units have engaged in price gouging following the fires.⁴ It is likely the same is occurring for short-term rentals.

Last year, the Board passed the Short-Term Rentals Registration Ordinance, a balanced measure intended to preserve long-term housing from conversion into tourist serving short-term rentals run by corporate hosts. However, the specific protections this emergency order would suspend from that Ordinance are all necessary to protect tenants and fire victims from unscrupulous actors seeking to profit from the natural disasters of the past few weeks. Removing the one-STR-per-natural person cap as proposed in the emergency resolution would allow landlords or hosts to mass-convert units into more profitable short-term rentals at the expense of fire victims looking for long-term shelter. Likewise, allowing ADUs to be used as STRs and removing the cap on unhosted stays incentivizes holding whole-unit rentals open for tourists, rather than use them to house displaced families. As our community begins to rebuild, it is important as many housing units as possible are preserved for those impacted by the fires.

For these reasons, we urge the Board of Supervisors to amend this emergency resolution to require that short-term rental guests be only those displaced by the January 2025 windstorms and fires as well as those assisting in the recovery. This amendment would ensure this resolution benefits those most in need at this time.

Best.

Victor Sanchez

Executive Director

² Data on file with Better Neighbors LA. Inside Airbnb: https://insideairbnb.com/los-angeles/.

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

⁴ https://www.torched.la/the-spreadsheet-brigade-thats-keeping-las-rental-market-from-exploding/

⁵ https://ttc.lacounty.gov/wp-content/uploads/2024/05/Short-Term-Rental-Ordinance.pdf



January 21, 2025

To: Los Angeles County Board of Supervisors

Re: 01/14/25 Board Agenda; Item No. 31-A

Subject: Amendments to Short Term Rental Resolution for Long Term Stability

Dear Members of the Los Angeles County Board of Supervisors,

We are writing on behalf of Strategic Actions for a Just Economy (SAJE) to express our opposition to the emergency resolution, Item No. 31-A¹, as currently drafted. We understand and deeply empathize with the need to provide housing solutions for those displaced by the January 2025 windstorms, however we are deeply concerned that the proposed changes to short term rental (STR) regulations could exacerbate the housing crisis and harm all Angelenos, especially the residents the resolution seeks to help.

Removing key regulations on STRs, such as the one-STR-per-person cap, allowing Accessory Dwelling Units (ADUs) and Junior ADUs to be used as STRs, and lifting the cap on unhosted status, will likely take critical housing units off the market for long-term residents. Studies show that in Los Angeles, short-term rentals raise the average annual rent by \$810 and remove 2,600 homes from the long-term rental market². These effects could be amplified throughout Los Angeles if the Board passes the motion as it is currently written.

Additionally, unscrupulous landlords are already exploiting the housing crisis by engaging in rent gouging practices that are disproportionately harmful to vulnerable residents. This emergency motion could make matters worse by incentivizing such landlords to convert long-term rental units into STRs for higher profits, leaving fire victims and low-income residents with fewer affordable housing options. It is crucial to recognize that deregulating STRs during a housing crisis only serves to deepen existing inequities and perpetuate displacement.

We urge the Board to amend this emergency declaration to ensure it truly serves those in need. Specifically, we recommend:

1. **Remove Units from STR Platforms**: Mandate that housing units listed on STR platforms, such as Airbnb, be returned to the long-term rental market. This could

¹ https://file.lacounty.gov/SDSInter/bos/supdocs/199541.pdf

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

- increase housing availability for displaced residents and mitigate STRs' broader impact on affordability.
- 2. Limit STRs to Fire Victims: Restrict STRs in the County to LA County residents displaced by the fires. This approach, adopted by Beverly Hills and Santa Monica, prioritizes displaced residents for housing.
- **3. Prevent Exploitation:** Implement safeguards against price-gouging and unlawful eviction to ensure the order cannot be misused by opportunistic landlords and hosts.

The Board has a responsibility to protect housing stability and affordability, especially during times of crisis. We appreciate the urgency to address the housing needs after the fires, however this motion's current form risks creating more harm than good. We respectfully urge you to adopt amendments that prioritize long-term housing for displaced residents and safeguard against the negative impacts of regulating the STR market.

Thank you for your attention to this critical issue.

Sincerely, Strategic Actions for a Just Economy (SAJE)

Iris Craige
Assistant Director of Policy and Research

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Direct of Policy and Advocacy