



**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
15.		Favor	Ann Dorsey	
		Oppose	Ernesto Juarez	Price gouging by the government to tax and increase property taxes and fees have increased burden on housing providers. Especially mom and pop small businesses who don't have leverage or credit to fix their properties.
			Steve Rogers	<p>Chair and Members of the Board,</p> <p>I respectfully submit this comment to oppose any extension of California Penal Code 396, subdivision (e), as applied to vacant rental properties in Los Angeles County in connection with the January 2025 wildfires. While I understand and support the intent of preventing price gouging during a declared emergency, applying this statute to long-vacant units—especially many months after the fires—overreaches the law's intended purpose and causes unnecessary harm to the county's housing supply and rental property owners.</p> <p>(1. Legislative Intent and Emergency Scope) PC 396(e) was designed as a temporary measure to address short-term housing needs following disasters. It is meant to prevent sudden, exploitative rent increases for housing needed by displaced residents in the immediate aftermath of a crisis. Extending the statute for vacant units well beyond the emergency phase undermines the temporary nature of the law and converts it into a form of ongoing rent control. This was never the Legislature's intent.</p> <p>(2. Harm to Small Property Owners) Los Angeles County has thousands of small-scale housing providers who rely on rental income to meet basic financial obligations, including mortgages, property taxes, insurance premiums, utilities, and ongoing maintenance. Extending PC 396(e) for vacant units—especially in an environment where operating costs have risen sharply—forces owners to absorb costs without the ability to set market rents that reflect current conditions. For many rental property owners, particularly mom-and-pop, this makes it economically impossible to bring units back online with the current 10% max price cap.</p> <p>(3. Discourages Renovation and Housing Recovery) Knowing that newly renovated or restored units will be locked into artificially low rents under PC 396(e) discourages these investments. The result is slower housing recovery, lower-quality housing stock, and, in some cases, a decision by owners to keep units vacant rather than rent them at financially unsustainable rates.</p> <p>(4. Conflict with County Housing Goals) Los Angeles County is currently facing a housing shortage. The County has publicly committed to increasing available rental housing to meet growing</p>

As of: 8/13/2025 9:00:06 AM

			<p>demand and to accommodate residents displaced by disasters. Extending PC 396(e) for vacant units works directly against these goals. Instead of encouraging owners to make vacant properties available to the market, it creates a financial disincentive to do so, thereby constraining supply and prolonging recovery efforts.</p> <p>(5. Economic Realities Post-Wildfires) Since January 2025, property owners have faced steep increases in insurance premiums due to wildfire risk and other factors, as well as rising property taxes, labor costs, construction material prices, and etc. PC 396(e)'s arbitrary rent cap does not account for these realities. Continuing to impose it for months after the disaster disproportionately burdens rental property owners without meaningfully improving housing affordability for those displaced by the fires.</p> <p>(6. Overlap with Existing Local Protections) Los Angeles County already has local tenant protection laws and rent stabilization measures that address housing affordability. Applying a state-level emergency price cap long after the initial emergency period is redundant and creates unnecessary legal complexity. If ongoing affordability measures are necessary, they should be implemented transparently through regular legislative processes, not through extended emergency statutes.</p> <p>(7. The Appropriate Approach Moving Forward) The best way to help residents displaced by the January 2025 wildfires is to facilitate the fastest possible return of housing units to the market. That requires allowing owners of vacant units to set reasonable, market-based rents that reflect current conditions and the cost of providing quality housing. Targeted assistance, such as direct rental subsidies for wildfire survivors, would be far more effective than blanket rent caps on units unrelated to the disaster's immediate impact.</p> <p>In conclusion, PC 396(e) served its intended purpose in the many days and weeks immediately following the January 2025 wildfires by preventing exploitative rent spikes for displaced residents. However, continuing to apply it to vacant rental properties months later no longer serves that purpose and instead harms the very housing recovery efforts our county needs. For the long-term stability and growth of Los Angeles County's housing market, I strongly urge you to allow PC 396(e) to expire for vacant units and focus on policies that directly address post-disaster recovery without imposing unnecessary economic burdens on small rental property owners particularly mom-and-pop.</p> <p>Thank you for your attention and consideration.</p>
		Item Total	3
Grand Total			3

Chair and Members of the Board,

I respectfully submit this comment to **oppose** any extension of California Penal Code 396, subdivision (e), as applied to vacant rental properties in Los Angeles County in connection with the January 2025 wildfires. While I understand and support the intent of preventing price gouging during a declared emergency, applying this statute to long-vacant units—especially many months after the fires—overreaches the law’s intended purpose and causes unnecessary harm to the county’s housing supply and property owners.

1. Legislative Intent and Emergency Scope

PC 396(e) was designed as a *temporary* measure to address short-term housing needs following disasters. It is meant to prevent sudden, exploitative rent increases for housing needed by displaced residents in the immediate aftermath of a crisis. Extending the statute for vacant units well beyond the emergency phase undermines the temporary nature of the law and converts it into a form of ongoing rent control. This was never the Legislature’s intent.

2. Harm to Small Property Owners

Los Angeles County has thousands of small-scale housing providers who rely on rental income to meet basic financial obligations, including mortgages, property taxes, insurance premiums, utilities, and ongoing maintenance. Extending PC 396(e) for vacant units—especially in an environment where operating costs have risen sharply—forces owners to absorb costs without the ability to set market rents that reflect current conditions. For many rental property owners, particularly mom-and-pop, this makes it economically impossible to bring units back online with the current 10% max price cap.

3. Discourages Renovation and Housing Recovery

Knowing that newly renovated or restored units will be locked into artificially low rents under PC 396(e) discourages these investments. The result is slower housing recovery, lower-quality housing stock, and, in some cases, a decision by owners to keep units vacant rather than rent them at financially unsustainable rates.

4. Conflict with County Housing Goals

Los Angeles County is currently facing a housing shortage. The County has publicly committed to increasing available rental housing to meet growing demand and to accommodate residents displaced by disasters. Extending PC 396(e) for vacant units works directly against these goals. Instead of encouraging owners to make vacant properties available to the market, it creates a financial disincentive to do so, thereby constraining supply and prolonging recovery efforts.

5. Economic Realities Post-Wildfires

Since January 2025, property owners have faced steep increases in insurance premiums due to wildfire risk and other factors, as well as rising property taxes, labor costs, construction material prices, and etc. PC 396(e)’s arbitrary rent cap does not account for these realities. Continuing to impose it for months after the disaster disproportionately burdens rental property owners without meaningfully improving housing affordability for those displaced by the fires.

6. Overlap with Existing Local Protections

Los Angeles County already has local tenant protection laws and rent stabilization measures that address housing affordability. Applying a state-level emergency price cap long after the initial emergency period is redundant and creates unnecessary legal complexity. If ongoing affordability measures are necessary, they should be implemented transparently through regular legislative processes, not through extended emergency statutes.

7. The Appropriate Approach Moving Forward

The best way to help residents displaced by the January 2025 wildfires is to facilitate the fastest possible return of housing units to the market. That requires allowing owners of vacant units to set reasonable, market-based rents that reflect current conditions and the cost of providing quality housing. Targeted assistance, such as direct rental subsidies for wildfire survivors, would be far more effective than blanket rent caps on units unrelated to the disaster's immediate impact.

Conclusion

PC 396(e) served its intended purpose in the many days and weeks immediately following the January 2025 wildfires by preventing exploitative rent spikes for displaced residents. However, continuing to apply it to vacant rental properties months later no longer serves that purpose and instead harms the very housing recovery efforts our county needs. For the long-term stability and growth of Los Angeles County's housing market, I strongly urge you to allow PC 396(e) to expire for vacant units and focus on policies that directly address post-disaster recovery without imposing unnecessary economic burdens on small rental property owners particularly mom-and-pop.

Thank you for your attention and consideration.