Communication from Public

Name:

Date Submitted: 09/06/2019 09:26 AM

Council File No: 14-1635-S2

Comments for Public Posting: We have a city permitted/city inspected ADU, which, it seems, is not going to qualify under the short term rental ordinance. We built it at great expense under the auspices that it would be a safe, legal structure (and it is). We also built it specifically for short-term rental, so it is only 290 square feet. It is far too small for someone to live in long term, but very comfortable for someone who is spending most of their days at the beach, or touring the city, etc. The logic that if we don't rent it short term, that this unit will move into the long term rental stock is flawed and unfair. It is the equivalent of an extra bedroom and should be treated as part of the house, but because of the permit process we're going to be penalized by this ordinance. I also don't understand how the city can let un-permitted, un-inspected conversions (garages, pool houses, etc) to be rented short term, but keeping new ADU's (that the city collected permit fee's on, and made more expensive by requiring they be built to code) off the market. ADU's should be allowed to be rented short term. The city took our money for permits but now wants to limit our use of the unit to recoup that cost. It is patently unfair and shortsighted.

Communication from Public

Name:
Date Submitted: 09/06/2019 10:02 AM
Council File No: 14-1635-S2
Comments for Public Posting: Please include in the council file (CF 14-1635-S2)

August 26, 2019

The Honorable Marqueece Harris-Dawson
Chairman, Planning, Land Use, and Management Committee
Los Angeles City Hall
200 N. Spring St, Room 450
Los Angeles, CA 90012

RE: Appendix A of the Home-Sharing Ordinance

Dear Councilmember Harris-Dawson,

Our coalition of workers, neighbors, tenants, lodging associations, employers and affordable housing advocates stand united behind the City's Home-Sharing Ordinance ("HSO"), and we are writing to express our dismay and concern with the Planning, Land Use & Management ("PLUM") Committee's decision to delay the adoption of Appendix A of the HSO at your last hearing on June 18, 2019. For the reasons set forth below, ***we respectfully request that this item be agendized in PLUM Committee for review and approval promptly.***

This is yet another attempt by the hosting platforms to spread mass confusion and misinformation, thus opening the door for further delay of the enforcement date of the HSO – November 1, 2019. Without Appendix A, platforms will be held to the strict terms of the ordinance. Thus on November 1st, we fully anticipate that the hosting platforms will conclude that there is no feasible way to comply with the ordinance because there is no agreed-upon system to transmit the data. Practical enforcement could then be pushed back even further. As you are aware, a delay on enforcement would allow for illegal home-sharing to continue proliferating, displacing hard-working Angelenos and their families from what little affordable housing remains in this city and furthering the disastrous homelessness crisis.

Background on Appendix A

In an effort to dispel the misinformation surrounding Appendix A and to reiterate the main points of the Department of City Planning's ("DCP") report dated June 13, 2019, there are three ways by which a hosting platform can come into compliance with LAMC Section 12.22 A.32(f) – the "Platform Responsibilities" section of the HSO.

1. Strictly comply with the ordinance - LAMC Section 12.22 A.32(f)
2. Comply with the provisions of the Administrative Guidelines and Appendix A
3. Enter into a Platform Agreement with the City

If a hosting platform chooses not to adhere to the strict terms of LAMC Section 12.22 A.32(f), Appendix A provides two alternative methods for platforms to satisfy their responsibilities under the HSO, an Application Programming Interface (API) Method or the Manual Spreadsheet Method. Adherence to Appendix A will exempt a hosting platform from being held responsible for enforcement action under the HSO. *The three options described above are separate and distinct from each other, and approval of Appendix A does not preclude a hosting platform from entering into a Platform Agreement with the City. Appendix A and a separate platform agreement can co-exist. Thus, there is no sound reason to continue delaying adoption of Appendix A.*

I. Consequences of Delay and Inaction

The City took over four years to negotiate and adopt an ordinance that was intended to preserve our housing stock. In doing so, the City took a necessary step to limit home-sharing to one's primary residence and ensure that housing would be saved for those who in need of long-term rentals. However, despite a unanimous vote of the City Council on the ordinance, PLUM has not acted to support enforcement efforts.

By failing to timely approve Appendix A, PLUM is tying the City's hands in building out the API system. With this system in place, the City's third-party contractor simply needs a street number (provided by the platforms) to cross-reference with registration information to verify listings. Through this streamlining of information, the City is able to enforce the HSO in real-time – thereby bringing long-term units back to the market sooner. Without the API system in place however, platforms must manually-share a much more significant amount of data, requiring more labor and time. By delaying its adoption, PLUM is clearly allowing Airbnb and other platforms to illegally profit at the expense of working class families in desperate need of housing.

The time for inaction has passed. We urge PLUM to not fall prey to the unscrupulous tactics of Airbnb and recommend the adoption of Appendix A as soon as possible.

Sincerely,

James Elmendorf
Los Angeles Alliance for a New Economy

Thomas Walsh
Unite Here Local 11

Lynn Mohrfield
California Hotel & Lodging Association

William “Chip” Rogers
American Hotel & Lodging Association

Heather Rozman
Hotel Association of Los Angeles

Judy Goldman
Keep Neighborhoods First

Larry Gross
Coalition for Economic Survival

Chancee Martorell
Thai Community Development Center

Becky Dennison
Venice Community Housing

Cynthia Strathmann
SAJE

Bill Pryzlucki
People Organized for Westside Renewal

Luis Cabrales
Inquilinos Unidos

Nancy Halpern Ibrahim
Esperanza Community Housing

Sissy Trinh
Southeast Asian Community Alliance

Damien Goodmon
Crenshaw Subway Coalition

Pete White
Los Angeles Community Action Network

Laura Raymond
Alliance for Community Transit – Los Angeles

CC:

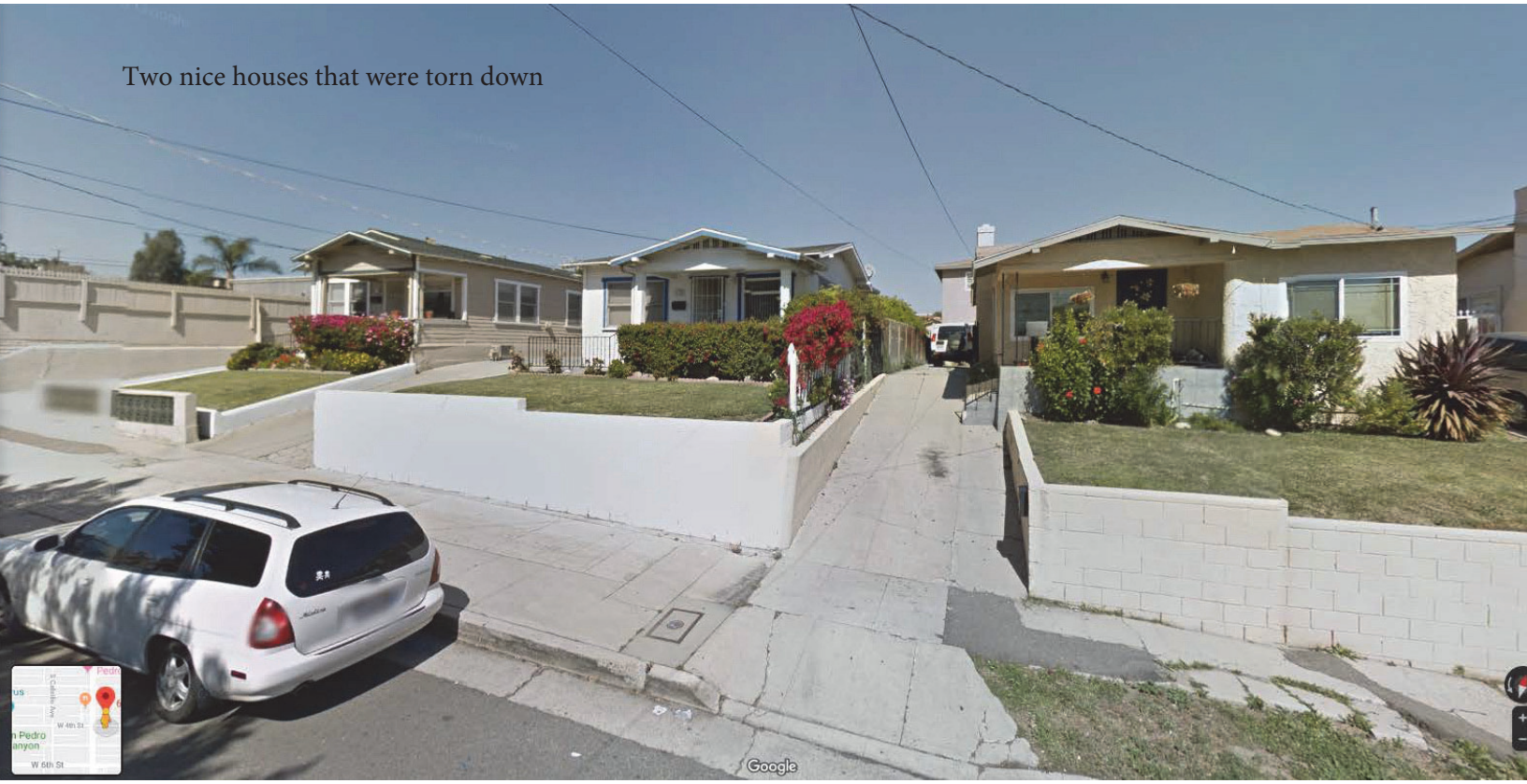
Mayor Eric Garcetti
Los Angeles City Council
Vince Bertoni
Arthi Varma
Matthew Glesne
Yeghig Keshishian

Communication from Public

Name: Ale Gonzalez
Date Submitted: 09/06/2019 11:37 AM
Council File No: 14-1635-S2
Comments for Public Posting: The City of Los Angeles is cornering me! It is making it increasingly difficult for me to make use of my asset and giving priority to large, corporate fast food chains. If there is a housing shortage, why allow the two houses next to my property to be torn down to construct ANOTHER fast food restaurant in an area that already has over TEN fast food restaurants within a few blocks? I urge you to delay enforcement of this ordinance and amend to allow more middle class Angelenos, such a me, to participate in the sharing economy. There are currently motions before the PLUM committee that would allow some form of owner-occupied RSO units to participate in the sharing-economy through short-term rentals. Not allowing owner-occupied RSOs to be part of short-term rentals is detrimental to the middle class and will further contribute to the economic anxiety many in the Los Angeles middle class are facing. Moreover, there is quite a significant distinction between whole buildings that have been converted into nearly all short-term rentals and properties that are owner-occupied, but because of their construction date, fall under the ROS ordinance. Back in 2012, I was a single woman in my mid-twenties, while my friends spent their extra income partying, I worked extremely hard and made sacrifices to save up to buy my duplex. Last year, the two houses directly adjacent to my property were torn down and replaced by a 24-hr Del Taco. This causes great disruption to our neighborhood and noise at all hours of the night. Additionally, this has affected the value of my property and decreased the market rental price due to the fast food establishment right outside my window. All of this allowed by the City of Los Angeles! Furthermore, it has reduced the pool of potential tenants because not too many people are open to living next to a 24-hr fast food restaurant on a long-term basis. Other challenges I face are continual illegal dumping of trash in the alley behind my house and the poor condition of sidewalks around my property. Nevertheless, despite all these challenges, I continue to work hard to maintain my duplex in top condition. The extra income I earn from short-term rentals has allowed me to further invest in my house in the last few months such as redoing the landscaping and maintaining my house in immaculate condition. In fact, when my cleaners go to turnover my house, I pay them extra out of my STR revenue to clean up the public alley

next to my house that the City cannot maintain clean due to constant illegal dumping. I could not afford this if it weren't for the STR income. We also pay all our taxes for the short-term rental: occupancy, state income, federal income, etc. Now, because of the new ordinance and my house being under RSO, I cannot host guests through short term platforms. This situation is incredibly unfair and is causing my family great emotional distress. My fiancé and I were planning on starting a family this year, but because a large share of our income is at risk of being lost due to this ordinance, we are now postponing. By enacting and enforcing this ordinance, you will cause great financial and emotional distress to many of middle class Angelenos, including me. The new Ordinance must be amended to allow our mom and pop operations to continue and prevent us from having to sell (to investors who are eager to scoop up our properties) because we can no longer afford our mortgages. I am a responsible host, I installed security cameras all around my property, and have a strict “no parties, no drugs” rules. I clean up trash outside my property to maintain high reviews. I do care about our neighborhood! Furthermore, the rentals we host provide a necessary service for tourists whose tax dollars benefit the city, and their dollars spent while traveling support local businesses. Most of the travelers I have hosted are families for whom a small, expensive hotel room is not a good fit. These rentals also serve locals who have family visiting, need accommodations during home repairs, are in between moves, etc. Additionally, the funds generated provide me and our cleaners with a living. LA City is not achieving any benefit in terms of “making an additional unit available on the market” because I will continue living in my unit, but I will no longer rent out the spare rooms in my house. If the objective of the ordinance is to “make more units available to the market” or “lower rental prices” or any other good intention it might have had, I do not believe that barring me from renting the extra rooms would help achieve any of these goals. I urge you to please listen to our stories and amend the ordinance to allow properties that have owner-occupied RSOs to do short-term rentals.

New 24-hour Del Taco that replaced two houses



Two nice houses that were torn down

Constant illegal dumping in the alley behind my property.

I consistently pay the cleaning lady to clean up trash in the alley from STR revenue. Due to review process of STR, and my general pride of ownership, it's in my best interest to maintain the area as clean as possible.

While I maintain my house in immaculate condition with the STR revenue, please observe the poor condition of public sidewalk in front of my home

The City of Los Angeles is cornering me! It is making it increasingly difficult for me to make use of my asset and giving priority to large, corporate fast food chains. If there is a housing shortage, why allow the two houses next to my property to be torn down to construct ANOTHER fast food restaurant in an area that already has over TEN fast food restaurants within a few blocks?

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