I would like to draw your attention to the following important provisions:

1. The draft ordinance permits rental of an entire home without the presence of the host and therefore is not "home sharing" but rather is the operation of a hotel/motel. Santa Monica requires the presence of the host - true home-sharing.

2. The draft ordinance allows short-term rentals for too many days - 180 days or half the year - which equates to 3 1/2 days every weekend. Sixty days a year should be the maximum.

3. The provision for 15 days of non-primary residence vacation rentals would make enforcement impossible for the provision limiting rentals to a primary residence.

4. The draft ordinance relies on the cooperation of web sites like airbnb for enforcement, but it's unrealistic to expect different results from the same provision adopted by several other cities that have been sued by airbnb.

Sincerely,
Richard G. Cohen
Treasurer, Pacific Palisades Community Council
in my individual capacity