Date: 6/13/17

Submitted in PLUM Committee

Council File No: 14-1635-S2 & 93

Item No. 6 & 7

Deputy: PUBLIC

Short Term Rental Statement by Bill and Yumiko Weeks: June 2017

The current housing crisis was brought on by greedy, unregulated money lenders who cost thousands of Americans their homes and their life savings. You are now considering legislation that will kill a goose that lays golden eggs while the Republicans are busy dismantling the Dodd-Frank Act and lifting regulations that have far greater consequences than any short term rental regulations you are considering.

Most of the studies I've read about short term rentals assume that if those spaces weren't being used for short term rentals, they would be available for long term rentals. That is not the case. The two rooms we rent were never used for long term rentals before we did Airbnb, and will never be used for long term rentals for as long as we own our home. My daughter, husband and granddaughters stayed with us this past Sunday and Monday nights. We blocked out the space on our calendar so no one else could book, as we always do for old friends and family. We could not kick out a long-term renter whenever we need a room and therefore would never consider long term rentals in the future.

When we bought our home in San Pedro we had been doing Airbnb for ten months in a small condominium. Our lender took account of the fact that we had been very successful with one bedroom and could rely on the extra money doing two bedrooms, when they gave us our loan. In our first full year at our new home we averaged slightly more than our monthly home payment every month. This is far better than most Airbnb hosts do (LA average is $7K year).

Although I have gotten regular increases in my teacher's salary over the last twenty years, I had found my buying power steadily declining. My wife and I tried many pyramid schemes and dozens of other ways to supplement our income, and had almost given up ever owning a real house in our lifetime. Airbnb supplied more than a fourth of our income last year and along with a small inheritance from my parents, allowed us to buy our first home of which we are greatly proud. If you limit rentals to one room, or the number of days per year we could rent (we are full 2/3 of the time) we would have to sell our home and like many other hosts—we would become a part of the housing shortage ourselves having to rent again. Either that or I would have to take an early retirement, condemning us to live out our days on half the income we hoped for, and moving to some place that has affordable medical care and welcomes the extra tax dollars generated by Airbnb. Because many other hosts would lose their homes and sell to people who probably wouldn't be able to host as well, Los Angeles would lose a considerable amount of tax revenue.

We often give tours to guests who don't have cars, have gone with them to museums and restaurants and special events, and have been more active ourselves because we want to know what to recommend to guests. We bought a $7000 air conditioning system, not because we need it in San Pedro, but because we lost some guests when they found out we didn't have one. We spent thousands on handy men and on fixing up our garden and getting new furnishings.

We have inspired neighbors to fix up their yards that had been neglected. I have letters from both of our next door neighbors and other neighbors attesting to the fact that we have not had a negative effect on parking, noise, or anything else because of our business. We have participated in a program where Airbnb gave us $50 to spend in our community, we helped put care packages together for military families during Fleet Week, we participated in counting the homeless in San Pedro, we participated in one of the most successful operations ever in putting together food boxes for the homeless in downtown LA, we have attended dozens of Airbnb events held all over Los Angeles at various restaurants, coffee shops and other venues. A friend of mine who is a small business owner in San Pedro said that his business has increased as a direct result of Airbnb customers finding out about him and is acutely aware that he does not get much business from the few hotels in the area. We have also gotten involved in political campaigns, sometimes walking door to door, doing phone banking, attending various meetings and even participating in different protests.

My father, Paul Weeks, was a staff reporter for the LOS ANGELES TIMES who was recognized in an article in NEWSWEEK as one of the ten most important writers of the Civil Rights Movement. In our Airbnb description we emphasize that we welcome guests of all races, religions, non-religious, sexual orientations, and from any nation. As we have two rooms that are often occupied simultaneously, we insist that guests never make other guests feel uncomfortable with regards to the above criteria.

Our next door neighbor who is a crane operator has gotten us involved with some of his ILWU union politics. He calls us a mini-United Nations and delights in casual conversations with our guests when he meets them on our drive way or when he joins us for a meal. Our guests have also benefitted from the personal contact they get by staying with us.

One young couple was from Saudi Arabia. Mohammed told me he could understand some of my views, but couldn't understand how we could put up with homosexuals. I didn't say much back, but a few days later we all shared Christmas Dinner together, along with an intelligent old friend of mine from college and his significant other. My friend speaks enough Arabic to know proper greetings, and Mohammed's eyes may have been opened just a little because of their encounter. We are still in touch with Mohammed and his wife whom my wife calls Ola-chan (an affectionate suffix used by Japanese people).

Another time we had a stimulating exchange between a conservative Catholic guest and an Egyptian guest. Amr still asks us through Facebook about his friend, David (who has become a neighbor of ours). We have attended Shakespeare by the Sea with him, his wife, and Mindy, another former Airbnb guest who moved into the area.

My wife, Yumiko, and I have no qualms about regulations against those who abuse the system by putting multiple addresses on Airbnb. We know that Airbnb discourages this and even removes such people from their platform when they discover them. But please don't pass restrictions on the number of rooms being used or the number of days. We want to stay in our home and continue participating with a dynamic positive impact on our community. Thanks.

Bil and Yumi Weeks Reference

Reading Time: 2 Mins

6/12/2017

To Whom It May Concern,

This is a reference letter for our neighbors Bill and Yumi Weeks who reside at 3300 So.Kerckhoff Ave., San Pedro, Ca. 90731

Our names are John and Doris Ahlstrom and we live at 3306 So. Kerckhoff Ave. San Pedro, Ca.90731 directly adjacent to the Weeks residence. They have been our neighbors for almost two years. My wife says they are the best neighbors we've had there and they are the fourth occupants since 1992. We have known since they first moved in that they earned extra income by offering a bed and breakfast room for visitors to our fair city. In these 20 months we have never been bothered by noise or other distractions nor has there been any parking problems. These small business entrepreneurs are a blessing for our neighborhood.

As to the larger issues that seem to be concerning the city a bed breakfast business is not anything new. How they get their bookings is irrevelant in these rapidly changing times of the new information age. We have been led to understand that the revenue from the bed and breakfast business is in the multi-millions and my wife and I would think the revenue from all the small bed and breakfast entrepreneurs would be welcome. We would hardly think that as great and diverse as our culture is in Los Angeles we as a city would be attempting to discourage small business start-ups.

Thank You For Your Time,

Doris and John Ahlstrom

Doris Ahlstrom

John A

JUNE 13, 2017

My name is Jennifer Gamata and I am a senior staff attorney at Inner City Law Center. ICLC is a non-profit organization that represents tenants. ICLC supports a short term rental ordinance, particularly an ordinance that seeks a cap between 60 and 90 days.

Los Angeles is in the midst of a housing crisis and we have lost numerous RSO properties in the past several years. None of the housing advocates that are in support of the short term rental ordinance are saying that Air BnB has caused the housing crisis, but it has certainly exacerabated it. Duplicitous landlords in Los Angeles have harassed tenants in RSO units to leave below market tenancies in order to empty out buildings. The landlords, specifically those in desirable and up and coming neighborhoods, then flip these units and can rent units on a short term rental. We need a short term rental ordinance to ensure abuse as described above does not continue.

Allowing a longer cap (over 60-90 days) will defeat the efficacy of the ordinance.

A short term rental ordinance is another tool we can use to battle the housing crisis in Los Angeles. We need multiple strategies to ensure housing affordability in Los Angeles. Please pass this ordinance and make sure that it remains strong to protect communities.

Thank you for your work on this issue.

jgamata@innercitylaw.org
(213) 891-3257
INNER CITY LAW CENTER
1309 E. 7th St.
Los Angeles, CA 90021

Date: 06/13/2017
Submitted in PLUM Committee
Council File No: 14-1435-S2/S3
Item No. 6 & 7
~~Deputy~~ Comm from Public

CALIFORNIA BLACK CHAMBER OF COMMERCE

Dedicated To Economic Empowerment

Date: 6/13/17
Submitted in PLUM Committee
Council File No: 14-1635-S2&S3
Item No. 6&7
Deputy PUBLIC

June 9, 2017

Hon. Herb Wesson
President, Los Angeles City Council
200 North Spring Street, Room 430
Los Angeles, CA 90012

Dear Councilmember:

As the President of the state's Black chamber of commerce, we are thoroughly involved in initiatives and programs to assure that our community and its business owners can thrive in California.

Of the thousands of businesses that are owned by African Americans in California, many are tied directly or indirectly to the hospitality industry. The industry has historically provided great opportunities for our members and the community at large with jobs and economic opportunities at every level.

As such, we have been very interested in and monitoring the growth of the home-sharing economy. We are aware of the changes that this economic model has meant not just for the hospitality industry but also for the automotive sector and others. We support innovation and change, we also support efforts that diversify the economic opportunities for African Americans in California and Los Angeles.

I am writing you today about the Home Sharing Ordinance that is pending before the City Council. Overall the ordinance with its concept of holding the home sharing industry to account for its activities, is very promising. Where it falls short is in the yearly cap on days a residence can be used.

As you most likely know, communities of color are disproportionately impacted by this industry. There are numerous stories of families being tossed out of rental units so that owners can rent them by the night. This concern will NOT be alleviated by the proposed ordinance. Rather we believe it will only serve to encourage home-owners and speculators to find ways to maximize their properties uses and create an incentive for them to toss out less profitable long-term tenants. Most of which in Los Angeles are minorities.

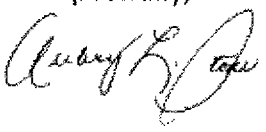
We think there are other options that are being offered such as limiting the number of days to far less (perhaps half the number proposed), and to discourage weekend use. While still allowing individuals their right to rent properties and invest in this new industry.

1600 Sacramento Inn Way, Suite 232 · Sacramento, CA 95815 · 916-463-0178 · cbcc@calbcc.org

There is no question that home-sharing is a vital business for the area, and it should be done logically and respectfully considering the communities that have been in this area for generations.

As a chamber, we are committed to economic development, and we are also committed to sound, local ordinances that protect the small business owners and our community. We encourage you to revise this ordinance, seek protections for less fortunate communities and work collaboratively with the stakeholders to find a solution that will work to keep California at the forefront of economic growth.

Respectfully,



Aubry Stone
President/CEO

Southern California Hispanic Chamber of Commerce

Dear Councilmembers:

I write you today about the pending City Council ordinance on Home Sharing in Los Angeles. As a leader in the Latino business community we are keenly aware of all the major initiatives that might impact our members and our community.

The Latino business community is vibrant, and according to a recent survey's the leading small business employer in Southern California. We are very interested in this ordinance because the importance the hospitality industry has played in the growth of our community for decades. Many of our members are vendors to the hotel, and hospitality industry and work at every level within these businesses.

We are very supportive of new business models, and want to encourage economic opportunities for Latino's in in Los Angeles.

We have looked closely at this ordinance and while on the surface it looks to be a reasonable change and pushes for greater accountability for the home-sharing industry, we are deeply concerned about some of the potential impacts that it does not address.

We have seen in recent years, members of our community who have been deeply impacted by this new home-sharing model. Families displaced to allow for more lucrative nightly rentals, businesses that are hurt by a transient population that comes and leaves and does not contribute to the local economy. And we have seen jobs lost for individuals that have looked to support long-term home owners or renters.

So, in reviewing the motion to suggest that 180 days of home sharing is a plus for our city, or community is highly misguided. It will in our view just encourage potential rental units off the market, and raise prices for those that most need it. With the recent report indicating that homelessness in Los Angeles has risen 23% in just the last year, it is poor policy to think about creating a law that might push more folks out of their homes.

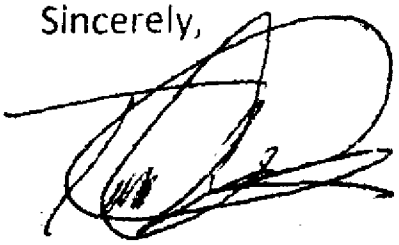
We encourage entrepreneurship, but we also want to make sure that it does not come at the cost of our most important asset in Los Angeles, the millions of Latino small business owners and entrepreneurs that have found ways to support the residential market and depend on a robust and vibrant economy.

It is our position that the Council ought to consider reducing the number of days that people can share their home, and put further requirements on financial transparency to that the city can track the impact this is having on our community, our city.

We are not encouraging over regulation or to stop the concept, but we are saying do it right, do it in a way that builds neighborhoods, not disassemble them. Home-sharing is here to stay, but it can be done right.

As a business group, we are committed to economic empowerment, but we also stand for smart, effective local government. We want to ask that you reconsider this ordinance, the way it is written, and put in place protections for communities that are most impacted, such as the Latino community. We believe the Council can and will do the right thing.

Sincerely,



Teresa Barahona www.socahcc.com

President


June 12, 2017

Dear Councilmembers:

We are reaching out to you today to express our feelings and concerns about the pending City Council ordinance on Home Sharing in Los Angeles. As active members of this community and people of faith, we are aware and concerned about the policies that affect the quality of life and issues of fairness to the residents of Los Angeles.

The Jewish community of Los Angeles is very involved in business and hospitality, and we are supportive of creative mechanisms for providing both business and hospitality opportunities to Los Angeles.

Yet upon reviewing the specifics, we are concerned about the potential impacts of this ordinance, particularly how it will affect the rental market that our community and so many other communities rely on. Housing fairness is akin to human rights, and we see the potential for driving up rents to be highly worrisome for our community, with so many relying on rentals and so many rent rates increasing as the market becomes smaller due to the home sharing industry and its growth.

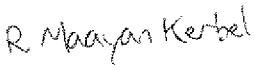
180 days is a significant portion of the year, and allowing homesharing for so many days puts our renting community under pressure to compete with the highly lucrative rates of by-the-night stays. We are concerned that this will push members of our community into financial distress, or worse, into homelessness.

We encourage entrepreneurship, but we also want to make sure that it does not come at the cost of fairness to our community and the communities we share this great city with. In the opposite vein of the suggested changes, we believe the Council should consider limiting the number of days that people can share their home and making sure that financial transparency is a top priority in the home-sharing industry. Community is so important to us and to everyone, we hope you can work towards creating an ordinance that works for all.

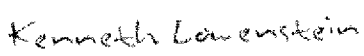
Sincerely,

Rabbi Israel Barouk, Da'at Torah Los Angeles

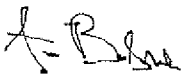
Rabbi Maayan Kerbel, West Coast Chabad Lubavitch



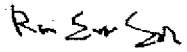
Kenneth Lowsenstein, Los Angeles Shmira Patrol



Avichai Ben Shmuel, Pico Shul



Rami Evan Esh, Pico Shul



Sarah Rivka Zulauf, Sarah's Organic Gourmet

Date: 6/13/17
Submitted in PLUM Committee
Council File No: 14-1635-S2 & S3
Item No. #7 & 6
Deputy: PUBLIC

KILROY

June 13, 2017

KILROY REALTY CORPORATION

12200 West Olympic Blvd.,
Suite 200
Los Angeles, CA 90064

Dear Councilman Huizar and honorable members of the PLUM committee,

I am writing to make some specific comments and suggestions on the proposed Home Sharing Ordinance (Council File #14-1635-S3, the "Ordinance") being heard by your committee. First, though, let me say that your office staffs and the Planning Department staff have done a superb job of listening to and balancing the needs of the many different interests on this issue and that we at Kilroy appreciate their efforts.

The Ordinance, as currently drafted, is a very blunt instrument that draws very bright lines. It needs to do that in order to balance the myriad competing interests without drowning in exceptions or becoming so complicated as to be unenforceable. While blunt instruments are very good at establishing clear rules that work in the majority of situations, they are not good for appropriately tackling unique situations.

Specifically, we own a building in Hollywood that contains 200 residential units. One hundred and five of the units are traditional apartments – unfurnished with standard leases of one year or longer. The other ninety-five units are essentially luxury corporate housing – furnished units with typical leases ranging from 31 to 180 days. These units primarily serve people in town for film shoots, discrete work projects and extended tourist holidays – all activities that contribute greatly to the Los Angeles economy. When there are leasing gaps between the longer occupancies in the furnished units, we will lease those units for periods of 7 to 30 days. Those short-term stays tend to serve people in town for commercial shoots, major events such as the Oscars and vacations – again, all activities that contribute greatly to the Los Angeles economy.

If the City adopts the Ordinance as currently drafted, those short-term rentals will no longer be possible unless we seek a new certificate of occupancy for the units. The Ordinance prohibits short-term stays unless 1) the unit is the lessor's primary residence or 2) the unit has a certificate of occupancy for hotel or transient occupancy residential structure. As a corporation, we cannot satisfy the first test and, therefore, would have to change the occupancy for the units prior to the Ordinance going into effect or permanently lose the ability to lease the units on a short-term basis.

The City will also lose out. Either the City will cease to receive the transient occupancy tax ("TOT") generated by these units or the units will be permanently removed from the City's pool of available housing units and converted to transient occupancy residential structure. Neither

scenario is ideal nor do they really accomplish the goal of the Ordinance of balancing the overall need for affordable housing with the City's need for TOT and the consumers' desire for options. In this case, because the units in question serve the corporate housing market, forbidding these units from leasing on a short-term basis simply frustrates the goals of generating TOT and providing consumers with options without actually doing anything to improve the supply of affordable housing in the City. Prohibiting short-term rentals simply leaves these units vacant for the week or two between longer rental periods and gets nothing in return for the City.

We believe there is an option to resolve this issue without undermining the integrity of the Ordinance. Specifically, we respectfully suggest adding a new subsection to 12.24.W of the Los Angeles Municipal Code to create a conditional use permit to allow transient occupancy as an accessory use for residential buildings. The new subsection could strictly circumscribe the instances when the CUP would be allowed, but then give the Zoning Administrator the flexibility to tailor the Ordinance to work in unique situations such as the one described above.

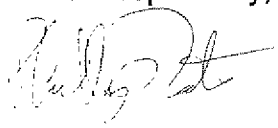
For example, the municipal code could:

- limit transient uses to 180 days (or whatever limit is established in the final Ordinance);
- prohibit CUPs for RSO buildings or units with affordability covenants;
- limit CUPs to buildings in R4, R5 or C zones;
- require landlords to have business licenses and remit TOT on short term stays; and
- set minimum stays of seven nights.

During the hearing process, the Zoning Administrator could further adjust the conditions based on the facts of that case. Perhaps for a certain building only a percentage of the units should be permitted to be leased on a short-term basis. Or, maybe in another instance it makes sense to lower the maximum number of nights for transient uses in a year. By creating a tightly constrained CUP process, the City will be able to meet the goals of the Ordinance while still maintaining the ability to accomplish sane results in unique circumstances.

I respectfully request that your committee request planning staff to report back on the feasibility of creating a CUP process before taking final action on the Ordinance. We appreciate the time and thought that your offices and City staff have put into the Ordinance. We believe it will be even better with this minor tweak. I am available to discuss further or provide additional information if needed.

Yours Respectfully,



Phillip Tate
Senior Vice President, Development & Government Affairs
KILROY REALTY CORPORATION

Internet Association

Date: 6/13/17
Submitted in PLUM Committee
Council File No: 14-1635-S2 & 53
Item No. 7 & 6
Deputy: PUBLIC

June 12, 2017

The Honorable José Huizar
Chair, Planning and Land Use Management Committee
Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

RE: Internet Association opposition to "Home Sharing Ordinance"
(CF#14-1635-S2 / CPC-2016-1243-CA)

Dear Chairman Huizar,

The Internet Association (IA) is respectfully, yet strongly **OPPOSED** to the proposed "Home Sharing Ordinance," which requires internet platforms to act as quasi-enforcement agencies for local governments and conflicts with federal law shielding internet companies from liability for user-generated content on their platforms. Also, IA is deeply concerned about the adverse impacts the proposal would have on consumer protection and privacy.

IA is a nonprofit trade organization representing over 40 of the world's leading internet companies and their global community of users. IA's mission is to foster innovation, promote economic growth, and empower people through the free and open internet.

Consumer Privacy and Protection

Internet companies cannot innovate and successfully provide beneficial services without the trust and loyalty of their users. That said, a requirement forcing online platforms to provide government officials recurring access to user data sets a dangerous precedent that violates a fundamental tenet of online privacy – that a user's information and online activities will not be summarily turned over to officials without sufficient legal justification. Our concern is heightened by the fact that the imposition of such a rule could be extrapolated to require further data from online platforms about their users.

IA argues that such a requirement could discourage the development of, and participation in, new and innovative internet services. Allowing government officials to obtain user data en masse may have an appreciable impact on the way internet platforms are perceived. Consequently, this could impact the frequency with which users participate in their services, as well as impose a burden on the companies through a loss of goodwill with their users. In short, a government policy that relies upon recurring data requests about online users for regulatory enforcement is not the right approach.

Intermediary Liability

In Subsection (f) under "Hosting Platform Requirements," platforms are required to "actively prevent, remove and cancel any illegal listings" or face substantial fines and penalties. IA argues that holding internet platform companies liable for user-generated content contravenes well-established federal law.

Internet Association

Recognizing that the internet and interactive computer services provide a platform "for a true diversity of political discourse, unique opportunities for cultural development, and myriad avenues for intellectual activity," Congress passed Section 230 of the Communications Decency Act in 1996. This statute addresses the treatment of online service providers and states in relevant part, "no provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider." IA urges the committee to not upend this important legal foundation by establishing a precedent of punitive measures against internet platforms.

Protections provided by Section 230 have enabled the internet's explosive growth and the necessary legal certainty for internet services such as blogs, social networks, search engines, streaming services, e-commerce marketplaces, and in the immediate instance, travel and accommodation sites, among others to operate. By allowing hosts to connect with people in search of a place to stay, short term rental platforms are another prime example where the free flow of user-generated content is leading to empowered individuals and widespread economic growth.

Internet-enabled short term rentals are a positive social and economic development that local consumers, and consumers worldwide, are embracing for good reason. IA supports smart regulations that promote continued innovation. Unfortunately, the proposed ordinance does not support this goal, nor does it demonstrate Los Angeles's commitment to promoting the city as an internet and innovation hub.

IA stands ready and willing to work with you and Los Angeles officials to find public policy solutions that continue to allow innovative online services to flourish while addressing community needs. For the reasons stated above and more, IA must respectfully **OPPOSE** the proposed ordinance. Should you have any questions regarding our position, please feel free to contact me at (916) 836-8984 or Kimzey@internetassociation.org.

Sincerely,

Lauren Kimzey
Senior Manager, State and Local Government Affairs
Internet Association

CC: Members, Planning and Land Use Management Committee
Matthew Glense, Department of Planning

Internet Association

The Unified Voice of the Internet Economy

About the Internet Association: Formed in September of 2012, the Internet Association unites the interests of leading global internet companies and their online community of users.

The Internet Association is dedicated to advancing public policy solutions at the local, state and federal level to strengthen and protect internet freedom, foster innovation and economic growth, and empower users.

Protecting Internet Freedom: The unique nature of the internet has unleashed unprecedented entrepreneurship, creativity and innovation. The internet provides access to information and personalized content to hundreds of millions of people around the globe. Freedom is essential to the preservation of that platform and the resulting economic growth, job creation and political liberty.

Fostering Innovation and Economic Growth: The internet allows inventors, entrepreneurs, organizations, and individual users to create and innovate in unprecedented ways. The low-to-nonexistent barriers to entry have made the internet a remarkable growth engine for small businesses, creating jobs in every sector of the economy. The Internet Association supports policies that ensure individual users, businesses, and governments are able to freely choose which internet technologies and platforms to use and support, without those choices being unduly constrained by regulatory structures that cannot keep pace with innovation.

Empowering Users: The Internet Association supports policies that allow all users to take full advantage of the product innovations that technology makes available rather than have their choices limited by government mandates. The Internet Association also supports policies that recognize the diversity and value of the business models used by various players in the internet ecosystem.

For more information, please contact Lauren Kimzey, State and Local Government Affairs for the Internet Association, at Kimzey@internetassociation.org.

United Way
GREATER LOS ANGELES

Date 6/13/17
Submitted in PLUM Committee
Council File No 14-1635-S2 & S3
Item No. 7 & 6
Public

May 10, 2017

The Honorable Members of the Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

Re: Affordable Housing and Home Sharing Revenue in the City of Los Angeles

Dear Members of the Los Angeles City Council,

United Way Greater Los Angeles (UWGLA) is a non-profit organization focused on breaking the cycle of poverty for our most vulnerable neighbors: families, students, veterans and the homeless. We are committed to fighting poverty at its roots. We focus on long-term solutions to the fundamental problems facing those in need in L.A. County.

One of the major factors that contributes to the cycle of poverty in California is the lack of affordable housing. The City of Los Angeles, in particular, is among the least affordable rental markets in the country, due in part to the city's historically low vacancy rates and lack of new development. UGWLA would like to participate in the conversation around affordable housing in the City of Los Angeles, particularly when it comes to the discussion on how to regulate short term rentals like those listed on Airbnb.

The City of Los Angeles' Affordable Housing Trust Fund aims to help close the funding gap for many affordable housing projects across the City, but has never had a permanent source of funding. We see the collection of Transit Occupancy Taxes from short-term rental platforms, like Airbnb, as an opportunity for a reliable and growing source funding for the Affordable Housing Trust Fund.

In July of this year, Airbnb struck a deal with the City of Los Angeles to begin collecting and remitting Transit Occupancy Taxes on behalf of their Los Angeles hosts. From August through December of 2016, Airbnb remitted $13 million in taxes to the City. Without changes to the policy, in 2017 this figure could reach more than $37 million. These are new, flexible dollars, that can be used to help close the funding gap in affordable housing projects and provide critical supportive services to those living in affordable housing projects.

As the Los Angeles City Council decides how to regulate short term rentals, we ask that it consider the tremendous impact these funds could have on City's ability to build more affordable housing and include language in the ordinance that sets aside this money for the Affordable Housing Trust Fund. We believe there is a solution that would allow the City to meet its regulatory needs while maximizing amount of funding that goes to building affordable housing.

Sincerely,

Elise Buik

Elise Buik
President & CEO

Los Angeles
Urban League

Empowering communities.
Changing lives.

June 13, 2017

The Honorable Members of the Los Angeles City Council
200 N. Spring Street.
Los Angeles, CA 90012

Dear Members of the Los Angeles City Council,

The Los Angeles Urban League (LAUL) is committed to identifying and addressing issues that are of concern to African Americans and other minorities in Los Angeles and throughout the state of California. Our mission is to provide resources to aid individuals in the following areas: Workforce Development, Entrepreneurship and Business Development, Personal Development, Education and Youth Development. For this reason, we feel it is important to express our organization's support for home sharing in the City of Los Angeles.

Over the past year, Airbnb has made an effort to expand economic benefits of home sharing to residents of South Los Angeles, holding a series of events with partners in the African American community.

Home sharing continues to grow in popularity in South Los Angeles and within the African American community, becoming an important resource for thousands of Angelenos to make extra money.

Residents of many low-income areas in Los Angeles can significantly supplement their income by renting their home, or a room in their home, on a short-term basis. The average Los Angeles host on the most popular home sharing platform, Airbnb, makes $7,200 a year—money that strengthens the community.

The extra income from hosting can be used to help individuals start businesses, advance their education, and travel. It can also help middle class families afford to stay in their home. In a recent survey, nearly 3,000 Los Angeles hosts said they have avoided foreclosure or eviction and kept their home due to the supplemental income they make from hosting on Airbnb.

Home sharing is also good for local businesses. Platforms like Airbnb give travels the option to stay outside the traditional hotel and tourist districts, like downtown and Hollywood, spreading the economic benefits of tourism to more small business around the city.

As the Los Angeles City Council prepares to weigh in on this debate, we at LAUL encourage them to consider the positive economic impact home sharing has on L.A.

Sincerely,

Nolan V. Rollins
President and CEO
CC:
The Honorable Eric Garcetti, Mayor of Los Angeles
Vince Bertoni, Director of the Los Angeles City Planning Department

LITTLE TOKYO SERVICE CENTER
Positive Change for People and Places
231 E. Third Street, Suite G106, Los Angeles, CA 90013
Tel: 213.473.3030 | Fax: 213.473.3031 | www.LTSC.org

May 18, 2017

Honorable Councilmember Gil Cedillo
Los Angeles City Councilmember, 1st District
200 North Spring Street, Room 460
Los Angeles, CA 90012

Re: Affordable Housing and Home Sharing Revenue in the City of Los Angeles

Dear Honorable Councilmember Gil Cedillo,

Little Tokyo Service Center is a non-profit organization focused on breaking the cycle of poverty for our most vulnerable neighbors: families, students and the homeless. We are committed to fighting poverty at its roots. We focus on long-term solutions to the fundamental problems facing those in need in L.A. County since 1979. We have developed over 950 units of affordable housing, including large multifamily housing projects, housing for seniors, a group home for developmentally disabled adults, transitional shelters for domestic violence survivors, and supportive housing for formerly homeless individuals. Our focus, however, is not solely on developing affordable housing. We also believe in pairing the building of housing with the building of human potential. From our background as a social service agency, we recognize that housing and facilities alone will not strengthen children and families. Therefore, the affordable housing we develop offers such on-site programs as youth mentoring, after-school programs, child care, parenting education, technology enrichment, job assistance, small business assistance and community organizing.

One of the major factors that contributes to the cycle of poverty in California is the lack of affordable housing. The City of Los Angeles, in particular, is among the least affordable rental markets in the country, due in part to the city's historically low vacancy rates and lack of new development. We would like to be included in any efforts around affordable housing in the City of Los Angeles, particularly when it comes to the discussion on how to regulate short term rentals like those listed on Airbnb.

The City of Los Angeles' Affordable Housing Trust Fund aims to help close the funding gap for many affordable housing projects across the City, but has never had a permanent source of funding. We see the collection of Transit Occupancy Taxes from short-term rental platforms, like Airbnb, as an opportunity for a reliable and growing source of funding for the Affordable Housing Trust Fund.

In July of last year, Airbnb struck a deal with the City of Los Angeles to begin collecting and remitting Transient Occupancy Taxes on behalf of their Los Angeles hosts. From August through December of 2016, Airbnb remitted $13 million in taxes to the City. Without changes to the policy, in 2017 this figure could reach more than $37 million. These are new, flexible dollars, that can be used to help close the funding gap in affordable housing projects and provide critical supportive services to those living in affordable housing projects.

As the Los Angeles City Council decides how to regulate short term rentals, we ask that it consider the impact these funds could have on City's ability to build more affordable housing and include language in the ordinance that sets aside this money for the Affordable Housing Trust Fund. We believe this is a solution that would allow the City to meet its regulatory needs while maximizing the amount of funding that goes to building affordable housing.

Please feel free to contact myself or Takao Suzuki, Director of Community Economic Development at (213) 473-1606 for more information. Thank you for your time.

Sincerely,

Dean Matsubayashi
Executive Director

KYCC

Administrative Office
[illegible] W [illegible] Suite [illegible]
Los Angeles, CA 900[illegible]
T [illegible]
F [illegible]
E [illegible] org

March 17, 2017

The Honorable Members of the Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Dear Members of the Los Angeles City Council:

The Koreatown Youth and Community Center (KYCC) is the leading multiservice organization in Koreatown, supporting children and their families in the areas of education, health, housing, and finances. We believe that if the family is healthy, our community will thrive.

KYCC is committed to making Koreatown a safe and beautiful place to live and work. Our programs and services are directed toward recently immigrated, economically disadvantaged youth and families, and promote community socioeconomic empowerment. That is why we feel it is important to express our organization's support for home sharing in the City of Los Angeles.

Home sharing has become an important resource for thousands of Angelenos to make extra money. The average Los Angeles host on the most popular home sharing platform, Airbnb, makes $7,200 a year—money that strengthens the community.

The extra income from hosting can be used to help individuals start businesses, advance their education, and travel. It can also help middle class families afford to stay in their home. In a recent survey, nearly 3,000 Los Angeles hosts said they have avoided foreclosure or eviction and kept their home due to the supplemental income they make from hosting on Airbnb.

Home sharing is also good for our local businesses. Koreatown is home to some of the most unique and diverse restaurants and small businesses the city has to offer. Platforms like Airbnb give travels the option to stay outside the traditional hotel and tourist districts, like downtown and Hollywood, spreading the economic benefits of tourism to more small business around the city.

As the Los Angeles City Council prepares to weigh in on this debate, we at KYCC encourage them to consider the positive economic impact home sharing has on L.A.

Sincerely,

Johng Ho Song
Executive Director

CALIFORNIA AFFORDABLE HOUSING DEVELOPMENT ASSOCIATION
550 SOUTH HOPE STREET, SUITE 1910
LOS ANGELES, CA 90071

January 9, 2017

The Honorable Members of the Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

Re: Affordable Housing in the City of Los Angeles

Dear Members of the Los Angeles City Council,

The California Affordable Housing Development Association (CAHDA) is a non-profit organization that provides a voice and a forum for emerging and established developers looking to build communities throughout California through the development of affordable and accessible housing. CAHDA would like to participate in the conversation around affordable housing in the City of Los Angeles, particularly when it comes to the discussion on how to regulate short term rentals like those listed on Airbnb.

The State of California is facing an affordable housing crisis. The City of Los Angeles, in particular, is among the least affordable rental markets in the country, due in part to the city's historically low vacancy rates and lack of new development. The City of Los Angeles' Affordable Housing Trust Fund aims to help close the funding gap for many affordable housing projects across the City, but has never had a permanent source of funding. We see the collection of Transit Occupancy Taxes from short-term rental platforms, like Airbnb, as an opportunity for reliable and growing source funding for the Affordable Housing Trust Fund.

In July of this year, Airbnb struck a deal with the City of Los Angeles to begin collecting and remitting Transit Occupancy Taxes on behalf of their Los Angeles hosts. Airbnb has estimated that collecting such taxes from its hosts could have yielded more than $20 million for Los Angeles last year. This money can be used to help close the funding gap in affordable housing projects and provide critical supportive services to those living in affordable housing projects.

As the Los Angeles City Council decides how to regulate short term rentals in the City, we ask that it considers the tremendous impact these funds could have on City's ability to build more affordable housing and include language in the ordinance that permanently sets aside one hundred percent (100%) of the tax dollars collected from short-term rentals for the Affordable Housing Trust Fund.

Please do not hesitate to contact me if you have any questions. Thank you for your consideration.

Sincerely,

Hildy Aguinaldo
Interim Executive Director
CAHDA

los angeles

June 12, 2017

The Honorable Members of the Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

Re: Support for a Smart Short-Term Rental Policy that Benefits the LA Economy

Dear Members of the Los Angeles City Council,

Our mission at the Los Angeles Latino Chamber of Commerce (LALCC) is to promote and support the economic growth and development of Latino businesses by providing them with public policy advocacy, economic development tools, training, connections and access to capital.

At LALCC, we believe that home sharing can play an important role in supporting job growth and economic development in the City of Los Angeles. In particular, home sharing activity presents a unique way to support Latino families and Latino-owned businesses throughout LA, who can benefit from increased tourism in communities that usually do not benefit from this foot traffic. That is why we feel it is important to express our organization's support for the adoption of fair home sharing rules by the LA City Council.

The hospitality and tourism industry continue to be among LA's leading industries – and top job supporters. As home sharing continues to grow in popularity, it is helping to meet the region's growing demand for global tourism and business travel, while creating local jobs and expanding economic opportunities for thousands of Angelenos. According to a NERA Economic Consulting (NERA) report commissioned by Airbnb, the home sharing platform helped support 14,800 jobs in Los Angeles last year.

Home sharing also plays a key role in supporting small businesses. Nearly half of Airbnb guest spending occurs in the neighborhoods where they stay. In 2016, the Airbnb community generated more than $1.1 billion in direct economic activity in Los Angeles. This is significant new income that is reaching hundreds of local businesses, beyond the traditional tourism corridors.

As home sharing continues to grow in popularity, it is also becoming an economic empowerment tool for thousands of Angelenos. Residents throughout Los Angeles can help avoid foreclosure, eviction – and cover the cost of expenses, by sharing their home or a room in their home, on a short-term basis. The typical Los Angeles host on the most popular home sharing platform, Airbnb, makes $7,200 a year— money that is then reinvested in our local economy.

As the Los Angeles City Council prepares to weigh in on this debate, we at LALCC encourage our elected leaders to join us in considering the positive economic impact home sharing has on LA businesses and LA's coffers, while embracing smart policies that mitigate potential neighborhood disruptions.

Sincerely,

Gilbert R. Vasquez
Chairman of the Board

Moises Cisneros
Executive Director

CC:
The Honorable Eric Garcetti, Mayor of Los Angeles
Vince Bertoni, Director of the Los Angeles City Planning Department

Consumer Watchdog

Los Angeles City Planning Commission
200 North Spring Street
Los Angeles, CA 90012-2601

June 13, 2016

Re: Case: CPC-2016-1243-CA (Proposed Home Sharing Ordinance)

Dear Planning Commissioners:

Ensuring that people offering to rent accommodations on a short-term basis through an online home sharing service follow the rules and pay appropriate taxes need not require Los Angles citizens to relinquish their right to privacy. Unfortunately, that is what the city's proposed home sharing ordinance would do.

Consumer Watchdog's concern is with the ordinance's provision to require Internet home sharing sites, such as Airbnb, to turn over to Los Angeles on a monthly basis the home sharing registration number, address, number of nights rented, and amount paid to every owner that rents their property through the site. This is an unwarranted intrusion into users' privacy and inappropriately requires the home sharing platform to do the enforcement work that should rightfully be done by the city.

Imagine the outcry if California's Franchise Tax Board required eBay to report the name, number of sales and amount collected in each sale for every person selling tchotchkes through the site, in order to seek out income tax cheats. Californians value privacy so highly we guaranteed it in the state Constitution. The users of home sharing sites have no less right to privacy simply because the companies are unpopular in some quarters.

Americans balk at this kind of mass data collection even when the government does it in the name of preventing terrorism. Why would it be acceptable when the government's aim is to catch homeowners violating zoning codes, short-term rental regulations or skimping on their taxes?

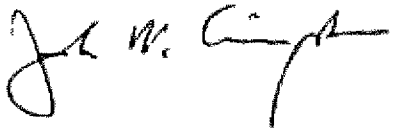
The legitimacy of sweeping government demands for Internet users' transactional and personal data is a key privacy question of our time. Requiring e-commerce sites to turn over personal data so enforcement officials can scour through records and search for potential violations of local laws amounts to a blank search warrant and a basic violation of our civil rights.

A government request for personally identifiable data should carefully balance the right to privacy against the right to safety and security for the public. Judges typically need to issue warrants for such information because it is considered each citizen's right to protect it. Throwing open the door to mass data collection – with no legal justification like a warrant – would deal a serious blow to privacy rights in Los Angeles.

We don't have a problem with requiring people offering home sharing accommodations to register with the city and get license. They should be required to pay occupancy taxes. If the home sharing site collects fees, it is appropriate to require it to pay the occupancy tax. Nor do we object to the city exercising its zoning. We share concerns that already expensive housing markets are being squeezed even further by the wholesale removal of properties to become vacation rentals. Nevertheless, surrender of users' privacy rights is not the way to go about regulating it.

People using home sharing sites to offer accommodations should follow zoning laws and pay their taxes. However, the blunt approach to enforcement contemplated here is a slippery slope and a significant threat to privacy. We urge the council to amend the ordinance and remove the provision requiring surrender of users' personal information.

Sincerely,



John M. Simpson
Privacy Project Director

Cc: Mayor Eric Garcetti, City Council, City Clerk

Recognizing that the internet and interactive computer services provide a platform "for a true diversity of political discourse, unique opportunities for cultural development, and myriad avenues for intellectual activity," Congress passed Section 230 of the Communications Decency Act in 1996. This statute addresses the treatment of online service providers and states in relevant part, "no provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider." IA urges the committee to not upend this important legal foundation by establishing a precedent of punitive measures against internet platforms.

Protections provided by Section 230 have enabled the internet's explosive growth and the necessary legal certainty for internet services such as blogs, social networks, search engines, streaming services, e-commerce marketplaces, and in the immediate instance, travel and accommodation sites, among others to operate. By allowing hosts to connect with people in search of a place to stay, short term rental platforms are another prime example where the free flow of user-generated content is leading to empowered individuals and widespread economic growth.

Internet-enabled short term rentals are a positive social and economic development that local consumers, and consumers worldwide, are embracing for good reason. IA supports smart regulations that promote continued innovation. Unfortunately, the proposed ordinance and does not support this goal, nor does it demonstrate Los Angeles's commitment to promoting the city as an internet and innovation hub.

IA stands ready and willing to work with you and Los Angeles officials to find public policy solutions that continue to allow innovative online services to flourish while addressing community needs. For the reasons stated above and more, IA must respectfully **OPPOSE** the proposed ordinance. Should you have any questions regarding our position, please feel free to contact me at (916) 836-8984 or Kimzey@internetassociation.org.

Sincerely,

Lauren Kimzey
Senior Manager, State and Local Government Affairs
Internet Association

CC: Members, Planning and Land Use Management Committee
Matthew Glense, Department of Planning

TRAVEL TECH
The Travel Technology Association

June 12, 2017

Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

Dear Los Angeles City Council Members,

The Travel Technology Association (Travel Tech) is the trade association for online travel companies, global distribution systems and short-term rental platforms. Our members include well-known short-term rental companies such as Expedia/HomeAway and VRBO, Airbnb, TripAdvisor, and Booking.com. These companies have created a vibrant marketplace for travelers and property owners, expanding the travel landscape by offering alternative accommodations and providing economic benefits to communities around the world.

As the City of Los Angeles begins to consider changes to its short-term rental regulations, we hope that the Council will take into consideration the impact of these proposed regulations on those Los Angeles residents who open their homes to travelers.

Collectively, our members help owners and hosts connect travelers with hundreds of thousands of properties around the globe each year. With Los Angeles continually ranked as one of the world's most popular destinations, short-term rentals play a vital role in the city's travel and tourism economies. Last year, our members helped more than a million visitors find short-term rentals throughout Los Angeles, generating well over a billion dollars in local economic activity. These visitors support small and emerging businesses and bring much needed economic opportunity to neighborhoods that have not traditionally benefitted from the city's tourism industry.

In addition, there are significant tax benefits to the city as well. Since enacting a tax agreement with the City of Los Angeles, Airbnb hosts and guests have generated $27 million in tax revenue. Additionally, Expedia's HomeAway/VRBO owners and managers have reported paying more than $2 million in taxes to the city since 2015. This is all money that gives policymakers the flexibility to support programs that benefit Angelenos.

We recognize that, as with any new and growing industry, the city must establish regulations regarding short-term rentals. However, efforts to create a regulatory framework must adequately balance the concerns of the community with the valuable contributions of short-term rentals. The benefits that technology, short-term rentals, and the broader peer-to-peer economy can have for residents of Los Angeles are endless. With that in mind we strive to promote sensible innovation and rules that democratize economic opportunity, foster innovation, and empower individuals.

TRAVEL TECH
The Travel Technology Association

Travel Tech and its member companies are available to the City as a resource, and we would welcome the opportunity to work with the Council to help establish public policies that promote innovation and establish workable regulatory solutions to better serve the city of Los Angeles, its residents, and future visitors.

Sincerely,

Matthew Kiessling
Vice President, Short-term Rental Policy
The Travel Technology Association

CC:
Mayor Eric Garcetti
City Attorney Mike Feuer
Controller Ron Galperin

G L A A A C C

Greater Los Angeles African American Chamber of Commerce
501(C) 6

June 12, 2017

The Honorable Members of the Los Angeles City Council
200 N. Spring Street.
Los Angeles, CA 90012

Dear Members of the Los Angeles City Council,

Our mission at the Greater Los Angeles African American Chamber of Commerce (GLAAACC) is to advocate and promote the economic growth and development of African American businesses by focusing on legislative advocacy, as well as identifying and developing business opportunities and strategic business alliances.

At GLAAACC, we believe that home sharing can play an important role in job creation and economic development in the City of Los Angeles. That is why we feel it is important to express our organization's support for the adoption of fair home sharing rules by the LA City Council.

Hospitality and tourism are vital to the Los Angeles economy. Home sharing continues to grow in popularity, serving the region's tourist and business traveler demand while creating jobs and economic opportunities for thousands of Angelonos. According to a NERA Economic Consulting (NERA) report commissioned by Airbnb, the home sharing platform helped support 14,800 jobs in Los Angeles last year.

Home sharing also helps support small businesses. Nearly half of Airbnb guest spending occurs in the neighborhoods where they stay. In 2016, the Airbnb community generated more than $1.1 billion in direct economic activity in Los Angeles. This is significant income for the city and it is being spread to local businesses across many parts of the city that don't typically see as much tourism activity.

As home sharing continues to grow in popularity in South Los Angeles and within the African American community, it is also becoming an important resource for thousands of Angelenos to make extra money. Residents of many low-income areas in Los Angeles can significantly supplement their income by renting their home, or a room in their home, on a short-term basis. The average Los Angeles host on the most popular home sharing platform, Airbnb, makes $7,200 a year—money that strengthens the community.

As the Los Angeles City Council prepares to weigh in on this debate, we at GLAAACC encourage the members to consider the positive economic impact home sharing has on L.A.

Sincerely,

Gene Hale
Chairman

CC:
The Honorable Eric Garcetti, Mayor of Los Angeles
Vince Bertoni, Director of the Los Angeles City Planning Department

5100 W. Goldleaf Circle, Suite 203 | Los Angeles, California 90056 Phone:

CALinnovates

June 6, 2016

City Planning Commission
200 N. Spring Street, Suite 550
Los Angeles, CA 90012

Re: CF #14-1635-S2
CPC-2016-1243-CA

Dear Esteemed Commissioners,

We write today to draw your attention to some of the severe weaknesses in the proposed ordinance in front of the City Planning Commission regarding oversight of online home sharing platforms.

The draft proposal violates key tenants of the federal Communications Decency Act (CDA) that have paved the way for some of the most consumer-friendly online platforms including Amazon, Facebook and PayPal. It also violates the privacy of people who put their homes up for rent on home sharing platforms by requiring those platforms to collect, and keep, onerous amounts of information on each host.

The proposal seems designed not to protect consumers or to encourage a new marketplace that is giving millions of people new ways to make ends meet, but to destroy this emerging sector of the new economy and protect the incumbent hotel industry.

The most distressing aspect of the proposal is its clear violation of Section 230 of the CDA. Passed into law in 1996, the section has been one of the most important tools for freedom of expression and innovation taking place on the internet. It protects websites from being sued for the actions or speech of people on those sites. This kind of protection was necessary for the rise of the kind of platforms we all use today. Ebay, for example, would have died on the vine if it risked being held responsible for every good sold on its site.

Part of setting up a vibrant marketplace has always meant risking letting a few bad actors in but markets have dealt with those situations internally. Rip someone off on Ebay and don't expect to get much more business once that negative review goes up.

Home sharing platforms are the same kind of websites as Google and Ebay. Homeowners and renters find each other through sites like Airbnb and HomeAway. They talk together to agree on a price for a few nights stay and conduct business solely with one another.

To hold the platform responsible for their actions clearly violates Section 230. Yet that's exactly what the ordinance proposes. Platforms would be liable for any host who is not in compliance with rules laid out by the city. The platforms can be fined $500 a day if they allow a listing from a non-compliant host to remain on the site. If the sites don't provide the city with addresses for non-complying hosts, they can be fined $1,000 a day.

Airbnb, for example, hosts millions of transactions per day across thousands of jurisdictions around the world. To expect a platform of that size (or any size) to police every single user to the degree described here by the city would be almost impossible and simply seeks to shift police power from the municipality to the private business. At the very least it would require Airbnb to hire a fleet of employees and legal counsel to monitor each listing and interaction.

This local act does not take priority over a federal act and on a federal level, the proposed ordinance's imposition of burdens for policing their own sites for the actions of their users is utterly preempted by Section 230 and will be challenged and struck down if they are enacted. These provisions should be struck from the ordinance or the entire ordinance should be withdrawn.
The ordinance asks platforms to violate the privacy of the people who are looking to rent out rooms or their homes in order to earn extra income.

Platforms will be required to collect registration numbers, addresses of all rental sites, the total number of nights each site was rented and the amount paid for each stay. There is no reason for home sharing sites to collect this information. They simply act as a matchmaker for homeowners and renters to meet and make deals.

The people who are using these platforms do not expect (and should not expect) that this kind of information is going to be collected and shared with the city. These documents will contain personal information that should remain private rather than open to anyone with the ability to hack the city's system or the willingness to file a public records request. It's been shown time and time again that government offices are

particularly insecure and easily hacked. Forcing the home sharing platforms to collect this information and share it with the city puts these users at risk and will discourage them from continuing to use home sharing platforms.

And at the end of the day, that seems to be the real purpose here — to make it as difficult as possible for home sharing platforms to thrive. Consumers have showed overwhelmingly that personal enterprise economy platforms like Airbnb and HomeAway add value to their lives. Travelers want to use these platforms for vacations, business travel and even to stay in different

parts of their own city. The proposed ordinance would have a chilling effect on this new marketplace and only end up hurting the Los Angeles economy, its residents and its visitors.

Sincerely,

Mike Montgomery
Executive Director

cc: Mayor Eric Garcetti
Council President Herb Wesson
Councilmember Mike Bonin
Sharon Dickinson
Etta Armstrong
Matthew Glesne
Tricia Keane
Justin Wesson

TECHNET
THE VOICE OF THE INNOVATION ECONOMY

June 12, 2017

Contact:
Scott Gerber, (202) 463-0067

TechNet Urges Los Angeles City Council to Protect Responsible Home Sharing

Washington — TechNet, the national, bipartisan network of innovation economy CEOs and senior executives, today voiced concerns about potential anti-home sharing regulations being considered in Los Angeles.

In a letter the Los Angeles City Council, TechNet wrote: "**TechNet is committed to supporting the city's economic growth and prosperity. We are proud to have many of our member companies contributing every second, minute, hour and day to the Los Angeles economy and to provide thousands of high-skilled jobs for Angelenos. We write to you today to ask for your support of the innovation economy and its contributions to the economic growth of the city of Los Angeles. A critical component to this is the sharing economy, which is pivotal to creating a 21st century economy that works for everyone.**

Too often, we see well-intentioned regulations stifle innovation. As the City of Los Angeles begins to consider changes to its short-term rental rules, we hope the Council will take into consideration the consequences both for middle class families who share their homes to make ends meet and for companies that do business in Los Angeles."

The letter was signed by Andrea Deveau, Vice President, State Policy and Politics at TechNet.

The text of the letter can be found below:

June 10, 2017

The Honorable Members of the Los Angeles City Council 200 North Spring Street Los Angeles, CA 90012

Re: Supporting the innovation economy and economic growth in the City of Los Angeles

Dear Members of the Los Angeles City Council,

TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

TechNet, which represents over 70 members, including breakthrough startups and the most storied, life-changing technology companies on the planet, keeps America's innovation economy growing and creating good-paying jobs. TechNet is committed to supporting Los Angeles' economic growth and prosperity. We are proud to have many of our member companies contributing every second, minute, hour and day to the city's economy, providing thousands of high-skilled jobs for Angelenos. We write to you today to ask for your support of the innovation industry and its contributions to the economic growth of the city of Los Angeles. A critical component to this is the sharing economy, which is pivotal to creating a 21st century economy that works for everyone.

Too often, we see well-intentioned regulations stifle innovation. As the City of Los Angeles begins to consider changes to its short-term rental rules, we hope the Council will take into consideration the consequences both for middle class families who share their homes to make ends meet and for companies that do business in Los Angeles.

Fostering innovation in the peer-to-peer economy is important to the prosperity and longevity of the Los Angeles economy. Home sharing in particular has helped democratize income for middle class families in Los Angeles by providing them with additional income to make ends meet and help them stay in their homes as the cost of living in the city rises.

Short-term rentals also play a vital role in the local travel and tourism economies. Last year, more than one million visitors stayed at Airbnb listings across the city and generated over a billion dollars in economic activity. These visitors support small and emerging businesses and bring much needed economic opportunity to neighborhoods that have not traditionally benefitted from the city's tourism industry.

In addition, since enacting the tax agreement with the City of Los Angeles, hosts and guests on the home sharing platform, Airbnb, have generated $24 million in taxes that give lawmakers the flexibility to support programs that benefit Angelenos.

We recognize the benefits that technology and the sharing economy can have for residents of Los Angeles and we strive to promote sensible innovation and rules that democratize economic prosperity, foster innovation, and empower individuals.

We look forward to working with you and industry leaders, community advocates and other elected officials who share our commitment to building bridges between technology and public policy to find workable solutions that will better serve the future of Los Angeles.

TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

Should you wish to discuss TechNet's request here or our perspective, I can be reached at adeveau@technet.org or on my cell at (805) 234-5481.

Sincerely,
Andrea Deveau
Vice President, State Policy and Politics

CC: The Honorable Mayor Eric Garcetti
Vince Bertoni, Director of the Los Angeles City Planning Department

About TechNet
TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes dynamic startups to the most iconic companies on the planet and represents more than 2.5 million employees in the fields of information technology, e-commerce, advanced energy, biotechnology, venture capital, and finance. TechNet has offices in Washington, D.C., Silicon Valley, San Francisco, Sacramento, Austin, Boston, Seattle, Albany, and Tallahassee.

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June 12, 2017

The Honorable Members of the Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Dear Members of the Los Angeles City Council,

The mission of West Angeles Community Development Corporation is to increase social and economic justice, demonstrate compassion and alleviate poverty in South Los Angeles neighborhoods through the vehicle of community development.

Last year, we partnered with Airbnb to hold an event aimed at expanding the economic benefits of home sharing to residents of South Los Angeles. More than 100 attendees gathered at West Angeles Church of God in Christ to participate in an in-depth home sharing workshop with current hosts and Airbnb staff.

As home sharing continues to grow in popularity in South Los Angeles and within the African American community, it is becoming an important resource for individual homeowners in our service area to make extra money. Residents of many low-income areas in Los Angeles can significantly supplement their income by renting their home, or a room in their home, on a short-term basis. The average Los Angeles host on the most popular home sharing platform, Airbnb, makes $7,200 a year—money that strengthens households and communities, including homeowners in South Los Angeles.

In July 2016, Airbnb signed an agreement with the City of Los Angeles to begin collecting and remitting a levy on behalf of their Los Angeles hosts. Airbnb has estimated that collecting such taxes from its hosts could have yielded more than $20 million for Los Angeles last year. This money can be used to help close the funding gap in affordable housing projects and provide critical supportive services to those living in affordable housing projects.

The City of Los Angeles' Affordable Housing Trust Fund has never had a permanent source of funding. We see the collection of the Transit Occupancy Tax from short-term rental platforms, like Airbnb, as an opportunity for a reliable and growing source of revenue to help close the funding gap for many affordable housing projects across the City. Increasing the production of affordable units, in turn, would help address the current shortage of housing units which the City of Los Angeles is facing.

As members of the City Council decide how to regulate short term rentals in the City of Los Angeles, we ask respectfully that they consider the positive impact these tax proceeds could have on the City's ability to build more affordable housing, and the potential of short homestays to provide expanded economic opportunities for Angelenos.

Sincerely,

CC:
The Honorable Eric Garcetti, Mayor of Los Angeles

Airbnb short-term rentals create millions of dollars in revenue for the city of LA via TOT -- a homeowner like me provides TOT to LA by booking part my home, on average, over 300 days per year. My projected gross earnings via Airbnb are $40k this year.

If short-term rentals are capped at 180 days per year, it is a huge detriment to everyone involved, and a huge loss in income for everyone involved.

Hosts who cannot make ends meet with 180 days per year rental income will either potentially lose their homes, or will find *unregulated* ways to still rent short-term -- in this case, LA will lose the TOT they could have gotten from people like me by **supporting *regulated*** short-term rentals.

It is actually not *safe* for a short-term rental to be unregulated -- especially for single women homeowners (and travelers) like me. Therefore it is not an option. Without Airbnb we have no protection against unruly guests (or dishonest hosts). I have very strict house rules on Airbnb, which my guests honor.

Capping short-term rentals to 180 days does not mean I will rent my home long-term for the other 6 months out of the year. That is not a realistic option for many reasons. Therefore, it does not help the housing shortage in LA — at all. It *only* means I will lose much needed income, and the City of LA will lose TOT income.

Long-term rentals pose real risks. I have had unruly longer term tenants and squatters I had to evict (and get a restraining order against) because they stopped paying rent and were threatening to kill me, my dog, my cat, and my Mom. Frankly, I do not want to **ever** rent to long-term tenants again.

Airbnb and regulated short-term rentals offer homeowners *real* protection from squatters, evictions, and damage to our property; *and*, TOT provides millions of dollars to the city of LA — which can be used towards creating affordable long-term apartments and housing for homeless, and for those who need it most. The money generated via TOT is a real possible solution to generating huge amounts of money -- for the city of LA's *very real* housing issues.

The billionaire HOTEL industry wants more money for themselves only. They seem to care nothing about the *actual* residents, tourists, and homeowners of LA.
(Moreover), Providing tourists and guests with an affordable, warm, home-away-from-home is an invaluable service — which hotels simply do not provide, and which guests deeply appreciate. Almost all of my guests have expressed this to me repeatedly.

Homeowners like me, who rent out part of our primary residence to make ends meet should NOT have limits on how many days per year we can do so. Any such cap is totally & completely counterproductive to everyone involved.

Thank you.

Date: 6/13/17
Submitted in PLUM Committee
Council File No. 14-1635-S2 & S3
Item No. 6 & 7
Deputy: PUBLIC

* John Ferraro Council Chamber, Rm 340, LA City Hall
200 N Spring St, 90012

* 1230-2pm = Robert St. Gavis, Spring Arcade Building,
541 S Spring St #314, 90013

Homeowner ~~in El Segundo~~ just a few miles away in El Segundo, since 2004.

Dear Councilmembers,

I am submitting a written statement because I made the trek from my home in Tarzana to city hall with my infant.

I grew up in my Tarzana home and am now raising my daughter there. You will hear a lot of stories today to support both sides of the issue.

My daughter wakes up in the middle of the night most nights because our neighbors rent their home as a party house. Every couple of nights, new renters scream outside her window.

I feel for the people who say that Airbnb helps them make ends meet but I don't understand why it's ok to make ends meet illegally.

When I was a child, the home next door was filled with a lovely family and we had community.

A 60-90 day cap would ensure that the house next door will have a family again, that my daughter will sleep soundly.

Thank you for your consideration,

Inna Henry

Tarzana 91335

Date: 6/13/17

Submitted in PLUM Committee

Council File No: 14-1635-S2 & S3

Item No. 6&7

Deputy: Public

June 13, 2017

My remarks for the Planning and Land Use Management Committee Hearing held at the John Ferraro Council Chamber, Rm 340, Los Angeles City Hall

I obtained my house through a very amicable divorce. I always loved my spacious home and hosted numerous large parties of 50 people or more over a span of nearly 20 years and counting. I'm keeping my house so that my adult sons may raise their families there at some point in the future. We still use the house for family gatherings and special events.

The house is now able to accommodate 15 overnight guests, consisting mostly of larger families with grandparents and small children as well. We have hosted sports teams coming to compete at the nearby STUB HUB Center. We have hosted renewals of wedding vows, memorial services, and family reunions. We have hosted guests coming to use the ports of Long Beach, prior to their departure on the various cruise lines or upon their return.

All the guests receive brochures from local attractions from Orange County to Santa Barbara. They are here to experience all that we have to offer and they pour money into their adventures, fueling the local economy along the way. Several of my guests have stayed on more than one occasion and have already booked their future travel plans to stay again.

The income from renting the 60 year old house has already helped pay for energy efficient windows, upgraded plumbing, new interior and exterior paint, new carpet, new furniture, as well as major repairs to our pool from the January storms earlier this year.

The guests staying in the home have traveled from Norway, Sweden, Ireland, England, France and our upcoming Japanese guests are coming to America for the first time to celebrate their father's 70th birthday! In addition to international travelers, our guests have come from all over our country! Ideally situated, Long Beach is half way between Disneyland and Hollywood.

Limiting this rental with its special features or any other short term rental within our community would be a poor decision because it would restrict the money flow not only to the owners but to the hundreds of local businesses that are prospering from the inflow of new and continuous revenue. Tax the rentals. Don't restrict them. No other business person would approve of any city restricting their business to 50% of the year. Would you like to get paid only 50% of the year? No other business person would approve of having to live at their place of work. Would you live here at City Hall? Restrictions like that make no sense from a business perspective.

Date: 6/13/17
Submitted in PLUM Committee
Council File No: 14-1637-S2 & S3
Item No. 6 & 7
Deputy: PUBLIC

This community can be influential in determining new zoning laws or the zoning laws can be adapted to incorporate what we are bringing to our local and overall economy, here in the Los Angeles area. Don't let fear and ignorance obstruct what is fair to the home owners and their guests from all over the world who are boosting our economy. We can move forward together to find solutions that will not only appease but will earn the praise and acknowledgement of this successful business model.

As a respectful and successful business owner, I thank you for your time and your understanding.

(562)544-2670
Jennifer

Point by point analysis of Home Sharing Ordinance Council File Number: 14-1635-S2 Council File Title: Short-Term Rentals /Preparation of Ordinance

Gerald Gubatan, Senior Planning Deputy
L.A. City Council District 1

Dear Mr. Gubatan,

When we met with you recently regarding the proposed home sharing ordinance, you requested we provide you with a detailed critique of the sections of the ordinance that would be particularly harmful to many of your Council District (CD1) constituents. We have reviewed the proposed ordinance in depth, and hope that all those influential in its outcome do the same. Here are the areas of concern and our analysis of their impact.

L.A. Municipal Code:
http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc

Text of Proposed Home Sharing Ordinance:
http://clkrep.lacity.org/onlinedocs/2014/14-1635-S2_misc_01-26-2017.pdf

Commentary:

It is our recommendation that the ordinance be totally rewritten to address whole house/apartment listings only and that no prohibitions be placed on rooms rented in host occupied primary residences.

The 180 day limit makes sense in regard to whole house/apartment listings if a city 1. Wants to assure that there is no vacation home industry in its city (Some cities like Big Bear, Atlantic City, NJ, Aspen, Colorado depend economically on vacation housing), or as a means of maintaining current rental stock to assure that rental property isn't converted into vacation property.

The only reason for a cap on rentals of rooms within one's host occupied primary residence, where there is shared space with the host and possibly other guests, is to ensure an undue advantage to the hotel industry and to prevent low income and homebound home owners from year round income. Such a prohibition is cruel and intrusive. It also prevents hosts from providing secure employment and benefits to support staff and independent contractors.

The proposed ordinance would criminalize home sharing and make it unaffordable and inaccessible to the people who need it most and use it the most to remain in their own homes in the communities they have lived in for years. If the intent is to abolish most home sharing in the city of L.A. without explicitly saying so, this is that ordinance.

If the city insists on the draconian clauses in this ordinance and the policing of private relationships in private homes, it should at least consider **grandfathering and hardship exceptions.** Many hosts are low income, elders, women and people with significant health conditions. Home sharing allows them to control with whom they live and for how long. Long term roommate tenant relationships can be difficult and expensive to terminate and can open already vulnerable hosts to domestic abuse and further financial hardship.

The burden of this ordinance on city infrastructure is significant. Enforcement could be resolved without creating new administrations and bloated administrative salaries, through increased funding to existing offices, most specifically the housing office, the city attorney's office and the finance office. The enforcement requisites of this ordinance would detract from monitoring landlord abuses in general and other city resources. If the issue is decrease in rental stock, imposing city inspections and monitoring of private lives in private homes is a waste of resources and incredibly intrusive.

The following clauses are the ones that are most problematic.

Date: 6/13/17
Submitted in PLUM Committee
Council File No. 14-1635-S2 & S3
Item No. 6 & 7
Deputy: PUBLIC

Summary:

The Proposed Home Sharing Ordinance:

- Forbids rental in any RSO units.
- Limits all rentals including host occupied rentals to 180 day.
- Imposes fines that disproportionately impact low income host occupied rentals even though the pretext for the ordinance is to support affordable housing and maintain existing housing stock.
- Sets up an entire new administrative bureaucracy with high administrative salaries instead of using and increasing funding to existing departments for housing enforcement & business licensing, creating more jobs that could effectively enforce housing and business licensing.
- Taxes, fines and applies fees to home sharing like no other business, including home based businesses.

Section 1 establishes that home-sharing IS a residential use of residential space, begging the question as to why home sharing would incur greater restrictions, fees, fines and registration than actual commercial businesses including home-based businesses.

As a residential use, why isn't it subject to the same processes and formalities as other residential uses?

Section 2
Needs to strike 180 days at least as it pertains to renting of rooms where there is shared space in the host's primary residence.

Section 3 Modifies section 12:22 of the L.A. Municipal Code:

Modifications to: 31 B 3: We have no problem with this definition if the intent of this ordinance is in fact to preserve existing housing rental stock; however, the city may want to consider vacation homes in general for the purpose of tourism, economic vitality and tax base.
This definition of primary residence could assure that whole house/apartment listings would be for 180 days or less, preserving the existing housing stock, but rooms in a host's home would have no cap because it's a primary residence and would have no impact on rental stock.

Modifications to: 31 C 1: Fee should be stated in the ordinance and should cost no more than any other application for a business licence or accessory use of a residence.

Modifications to: 31 C2c: The city should not be in the business of lease enforcement. This is a tenant landlord issue and there are already civil procedures for enforcement.

Modifications to: 31 C2d: **Prohibits ANY home sharing in RSO units.**
This is one of the most troubling and discriminatory clauses in the proposed ordinance. It impacts the lowest income homeowners and renters. Rent stabilization provides stable rent to stable tenants. It does not guarantee low rent, especially for newer tenants, and can be an incredible financial burden for owners who live in their RSO buildings. Home sharing in one's host-occupied primary residence could offset the impact of providing and maintaining rent stabilized rental units. Furthermore, many low income families and homeowners inhabit RSO buildings as their primary residence. So long as no one has been displaced, there should be no limit on home sharing host occupied listings. Allowing owners who live in their RSO properties, especially properties of 4 units or less, to home share in their own homes would offset losses due to rent control.
This is perhaps where it would make the most sense to impose a 180 day limit on **whole apartment listings, (allowing vacation homes in more affluent structures)** so that tenants or owners who occupy their property can rent out whole apartment listings when they are away, out of town for work or vacation, but not as a year round enterprise.

Restricting home sharing to rooms within the host occupied primary residence year round, and limiting whole apartment listings to 180 days in one's PRIMARY RESIDENCE, is sufficient to prevent the abuses of home sharing of RSO units. The RSO units are among the most enforceable of L.A. housing. All RSO units are on file with the housing office as are all Ellis Evictions. With the funds set aside for enforcement of home sharing, the city should increase regular inspections of RSO units in general and improve outreach and education to tenants of their rights. The city attorney's office would also be responsible with enforcement of any landlord abuses of tenants' rights including

listing of whole apartments as short term rentals, that are not the primary residence of the landlord or a tenant.

Modifications to: 31 C2f: While the city may want to limit the number of whole house or vacation listings per host, hosts certainly should be able to offer more than one guest room to more than one group of guests at a time in their homes and the city should not be policing private relationships in private homes. This has absolutely no impact on rental stock and has terrible implications for privacy rights.

Modifications to: 31 C3: Expiration and Renewal: Fees should not be used to prevent people from home sharing. Licensing in general should be through the finance office and should be consistent with business licensing in general and home based business licenses specifically.

Modifications to: 31 C4 Suspension and Revocation: A 3 year prohibition if violations have been corrected, and without due process, is especially harsh. Such a time frame could result in a host losing one's home, thus having a greater impact on rental stock and homelessness in the city and presenting an undue hardship on low income homeowners and renters who homeshare. A restaurant or hotel with major safety violations doesn't have to wait 3 years to reopen. Again, the restrictions on home sharing should be consistent with business licensing in general.

Modifications to: 31 3d: Prohibitions

Prohibitions 3-10 should be eliminated or modified as follows: Home sharing provides essential income to marginalized workers who may have difficulty finding work in the mainstream workforce. Sections 3-5 need to be struck in entirety. The second half of **6** and all of **7** need to be struck. A home with 2, 3 or more extra rooms should be rentable to separate parties.

Prohibition 8 should not apply to primary residences of host occupied listings, and whole apartment listings could be subject to a cap to assure that rental stock is maintained, but there is no legitimate rationale for excluding home sharing in RSO homes. Disallowing home sharing in newer affordable housing units unfairly impacts the lowest income tenants.

Prohibition 9 prohibits home sharing in single family homes that were converted from RSO units **and** should only apply to homes where there were tenant displacements via Ellis Evictions or otherwise illegal coercion and should have no bearing on hosts who converted their primary residences from a duplex to a single family home where no tenants were displaced. Many families live in RSO units in family owned property. Home ownership is the most basic and stable of affordable housing and RSO properties are among the least expensive, allowing homeownership to low income families. **At the very least, this clause should be grandfathered to apply to new conversions after passage of the ordinance.**

Prohibition 10 prohibits home sharing where any other home based business is conducted. This clause is especially vague and could include listing of restaurants in the neighborhood, sharing business cards, or simply having L.A. Times inserts on the coffee table. But it also prohibits any other otherwise permitable home based business. With many workers in this economy having many income streams this serves only as a disincentive and has no value within the stated purpose of the proposed ordinance. Many hosts work out of their homes in many capacities especially those hosts with health conditions that make work outside of the home difficult. People who run home based businesses are at home and are ideal hosts, are more inclined to host than workers who have 9-5 jobs and their presence in the home is a deterrent to potential excessive noise and other neighborhood disturbances. Otherwise prohibited home based businesses are already disallowed and do not need to be incorporated into this ordinance. Additionally, depending on who you ask in city government, you get a different interpretation of this prohibition. It is dangerously vague.

Section 3 e 3: Transient Occupancy Tax: With some platforms collecting TOT for hosts, the department of finance may have to amend and correct its current reporting forms, and LAMC article 1.7 (Transient Occupancy Tax) may have to be further amended. Most hosts support this tax and are proud to provide essential income to the city despite the disproportionate tax burden to home sharing when compared to other small businesses.

Section 3 d: Enforcement of Violations: If the purpose of the ordinance is to protect housing stock, maintain communities and decrease or eliminate landlord abuses of tenants' rights it makes no sense to have penalties to host occupied, primary residences, especially where the penalty is greater for lower income hosting. The fine for a violation in a $50/night listing is as great as the fine for a $1000/night accommodation. This disproportionately impacts low income hosts and could result in greater displacement, evictions and foreclosure if hosts can't meet

these fines. It also further reduces city enforcement to count the number of days of hosting in private residential spaces in private homes of hosts. There should be no cap and no limits on private relations in primary residences.

***Section 3 f*: Platform requirements:** should be consistent with the other changes made to this ordinance. Hosts should be able to have more than one active listing in their host occupied primary residence with no cap on days of operation, and should be able to list on online platforms.

***Section 3 g*: Criminalization:** criminalizes home sharing, making already draconian home sharing limitations, a misdemeanor criminal offense. This should be discouraged. Criminalization systemically disproportionately impacts, the most marginalized members of our society.

Section 4 Hotels and home sharing in commercial zones. This section changes existing laws related to home sharing and transient occupancy in commercial zones where such enterprises were already allowed. These changes make it harder to establish home sharing in residential buildings in commercial zones. This serves no purpose except to make it harder for people living in those nonresidential zones from participating in home sharing. If one of the concerns regarding home sharing is changes to residential neighborhoods, changing residential uses of commercial zones makes no sense at all. If conceding to the hotel industry is the purpose, then the intent is quite clear.

Conclusion:

It is our position that this ordinance should be voted down or totally redrafted to focus on whole house/apartment listings with no caps to any home based host occupied primary residences. Any limitation on whole house listings should be weighed against the benefits they provide our city in bringing in and supporting additional tourism, jobs, small businesses and taxes for essential services, and increasing access to beaches, mountains and accommodations that many Angelenos could otherwise not access. Home sharing provides the only alternative to the $300 a night hotel room and the 12 month lease. We encourage using existing structures and offices to provide business licensing, increase tenants' rights and education, curb landlord abuses, and maintain current and provide additional affordable housing. Home sharing has provided work and business opportunities to many marginalized workers, maintained communities by allowing people to afford to stay in their homes, allows elders to "age in place."

If hosts are limited to one listing 180 days a year, in noncommercial areas only, then no one can provide on site 24/7, professional level accommodations, service and oversight, especially since this ordinance also disallows conducting any other otherwise permitable home based business in a home shared listing. The city cannot call on home sharing hosts to provide outstanding and accountable service while reducing home sharing to a part time hobby for otherwise employed hosts working outside of their homes, while simultaneously imposing fines, fees and taxes not experienced by or imposed on any other business model in the city.

If an ordinance was to be devised to destroy home sharing without an outright prohibition, and unfettered monopoly on accommodations to the hotel industry, this is that ordinance.

If the intent was to limit the number of whole house listings, preserve neighborhoods and protect housing stock, and enforce tenants' rights against landlord abuses, then enforce existing laws, and WRITE THAT ORDINANCE!

Sincerely,

Andy Griggs

American Gloria Lopez-Martinez

Emma Rosenthal

(Listed in alphabetical order)

DragonflyHill Urban Farm

Cultivating Community

dragonflyhill.wordpress.com

dragonflyhill345@gmail.com

310.704.3217 or 818.404.5784

edn

Ensuring Access to Justice
and protecting the right to healthy housing
for the 70K households that face eviction in Los Angeles County each year.

Date: 6/13/17
Submitted in PLUM Committee
Council File No: 14-1639-S2 & S3
Item No: 6 & 7
Deputy: PUBLIC

Short Term Rental Ordinance
6/13/2017

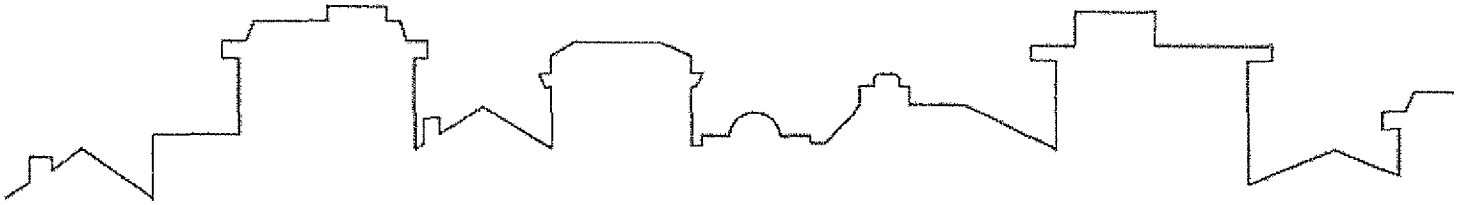
Short Term Rental Abuse: In 2016 the Eviction Defense Network handled approximately 60 evictions related to AirBnB rentals. These were all cases where the owner took a unit off the rental housing market and then began to rent exclusively on AirBnB or other short-term rental websites. This constitutes the loss of 60 affordable rent controlled units.[1] It is estimated that a subsidy of approximately $100K is needed to construct a unit affordable to a moderate income tenant. We cannot afford to lose affordable rent controlled units because we cannot building out way out of this problem. Restrictions on short term rentals that result in the loss of rent controlled units are essential to stopping the loss of affordable rent controlled units AND the wholesale conversion of our neighborhoods into transient occupancy tourist areas.

Restrictions on Renters: Many of our clients are unable to afford housing in our city and, either with or without the permission of their landlords supplement their income via AirBnB. Some of these tenants will lose their housing without that supplemental income. Some consideration should be given for initiating a process whereby renters can petition to supplement their income via short-term rental income. This could be monitored via the Los Angeles Housing and Community Investment Department.

Caps 90 day Cap: Some AirBnB hosts rely on the income from the rental of one room in their home to survive. The 90 day cap may impose a hardship on some of these hosts. If a 90-day cap is imposed, create a mechanism whereby hosts can appeal the restriction.

Referrals to Legal Assistance: The Short Term Rental Ordinance is essential to stopping the loss of affordable rent controlled units and to preserving our neighborhoods as residential neighborhoods. Affordable housing construction is part of the solution but we cannot build our way out of this housing crisis. We must resist displacement of any tenant, particularly below market rate tenants.

[1] We don't code for short term rental information so the number is likely higher. We also do not track how many units where the tenant(s) was displaced for other reasons, eg. Ellis Act evictions or even purportedly "for cause" evictions. Also, we don't know how many tenants move out without a court process due to voluntary vacate offers and/or harassment or simply because they don't know their rights under rent control.



Eviction Defense Network
1930 Wilshire Blvd. | Suite 208 | Los Angeles, CA 90057 | phone 213.385.8112 | fax 213.385.8181 |
www.evictiondefensenetwork.org
A California 501(c)(3) Nonprofit Organization

On January 12, 2017 the Eviction Defense Network assisted 6 tenants that came to us too late to provide assistance.[2] Some of these tenants had contact with members of the City Family including attempt to access information from the Housing and Community Investment Department. Had these tenants reached us BEFORE entry of default, we could have preserved the housing or negotiated sufficient time and financial resources to stabilize the family. Some are now facing homelessness. There is no reason for this to happen!

Today, when you return to your offices, take the time to go on the HCID website. Pretend you are a tenant facing eviction. Look for legal resources. You will not find the resources easily and what you will find is not the fastest referral track to the correct referrals. The solution to this problem is easy and virtually cost free:

1. Provide a link on the HCID website on the Home Page that says: "Legal Resources for Tenants." The link should take you to the referral list at Tab 1.

2. Ensure that all HCID Public Counters have the attached referral list.

3. Make sure EVERY tenant that files a complaint with HCID, on the day the complaint is filed, is emailed and mailed the attached referral list with this language: "Please seek legal assistance while we investigate our complaint. Attached is a referral list of nonprofit agencies that assist tenants for free or based on ability to pay." Last year I personally handled half a dozen cases of tenants that thought that filing a complaint with HCID was sufficient to stop an eviction and found themselves with a Sheriff's notice on the door because they did not file an Answer to the Unlawful Detainer with the court.

4. Make sure every member of the City Family including all of your staffs have a basic understanding of the eviction process AND of the resources available for tenants facing any type of housing problem and have access to the attached referral list.

5. Have all City Inspectors hand out the attached referral list at every inspection.

6. Ask the REAP Outreach Agencies to hand out the attached referral list during their outreach.

7. Fund additional door to door outreach using the attached referral list.

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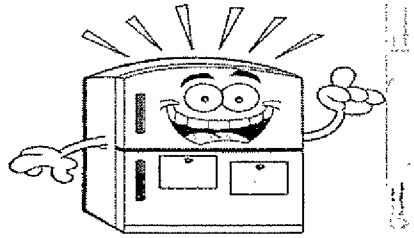
[2] 2 in Councilman O'Farrell's District. 1 in Councilman Koretz' District. 1 in Councilman Buscaino's District. 1 in Councilmember Cedillo's District. 1 in Santa Monica

TENANTS – LEGAL RESOURCES
INQUILINOS – RECURSO LEGALES



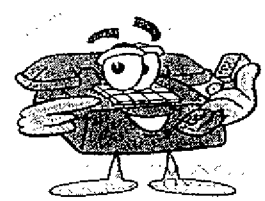
No appointments. Walk in. Free consultations. Donation welcome
No necesita cita. Consulta gratis. Donaciones bienvenidas

MON / LUNES	TUES / MARTES	WED/MIERCOLES	THURS/JUEVES	FRIDAY/VIERNES	SAT/SABADO
EVICTION DEFENSE NETWORK* 1930 Wilshire Blvd #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. - 9:00 p.m.	EVICTION DEFENSE NETWORK* 1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. - 9:00 p.m.	EVICTION DEFENSE NETWORK* 1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. - 9:00 p.m.	EVICTION DEFENSE NETWORK* 1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. - 9:00 p.m.	EVICTION DEFENSE NETWORK* 1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. – 6:00 p.m.	CES* 7377 Santa Monica Bl. West Hollywood (213) 252-4411 10:00 a.m.
INNER CITY LAW CENTER* Karsh Family Center 3750 West 6th Street Los Angeles, CA 90020 9-11 a.m.	SAJE 152 W. 32ND STREET Los Angeles, CA 90007 (213) 745-9961 4:00 p.m. - 7:00 p.m.	INNER CITY LAW CENTER* Karsh Family Center 3750 West 6th Street Los Angeles, CA 90020 9-11 a.m.	SAJE 1910 Magnolia Av. Los Angeles, CA 90007 (213) 745-9961 10:30 a.m.-12:30 p.m.	UNION DE VECINOS 346 S. Gless St. Los Angeles, CA 90033 (323) 908-3454 4:30 p.m. - 8:00p.m.	UNION DE VECINOS 346 S. GLESS ST. Los Angeles, CA (323) 908-3454 10:00a.m. 2:00p.m.
HOUSING LONG BEACH 525 E. 7TH St. #111 Long Beach, CA 90813 (562) 436-8592 4:30 p.m.	LEGAL AID FOUNDATION* Karsh Family Center 3750 West 6th Street Los Angeles, CA 90020 (323)801-7987 2nd Tues/2ND Martes 6:00p.m.	UNION DE VECINOS 346 S. Gless St. Los Angeles, CA 90033 (323) 908-3454 4:30 p.m. - 8:00 p.m.	ACCE* 3655 S. Grant Av. #250 Los Angeles, CA 90007 (888)964-8086 4:00 p.m. - 7:00 p.m.		LACCLA* 407 S. Chicago St Boyle Heights CA 310/866-7527 5:15p.m.
INQUILINOS UNIDOS 1930 Wilshire Bl. #801 Los Angeles, CA 90057 (213)436-8592 5:00 p.m.-6:30 p.m.		LA-CAN 838 E. 6TH Street Los Angeles, CA 90021 (213) 228-0024 4:00 p.m. - 7:00p.m.	BY APPOINTMENT/CON CITA SOLAMENTE City of Los Angeles Residents (213) 986-8266 (Los Angeles Tenants Union) City and County of Los Angeles: Free consultations in person walk-in only at the Eviction Defense Network. Paid consultations by phone or by appointment. To arrange for a paid consultation please send an email to info@edn.la or leave a message at 213/385-8112 x 224. Central Los Angeles Residents (213) 891-3244 (Inner City Law Center)* Santa Monica Residents (310)899-6200 (LAFLA Santa Monica)* (310)394-0848 (Santa Monicans for Renters Rights) West Hollywood Residents (323) 549-5841 (Bet Tzedek Legal Services)*		
		CES* 7377 Santa Monica Bl. West Hollywood (213) 252-4411 7:00 p.m.			

AFTER AN EVICTION IS FILED / *DESPUÉS DE QUE SE ARCHIVE UN DESALOJO*

SHRIVER PROJECT*	SELF HELP CENTERS*	EVICTION DEFENSE NETWORK*
111 North Hill Street. Room 115 M-Th 8:30 a.m. – 4:30 p.m. Closed/Cerrado 12:00 p.m. – 1:30 p.m. Friday/Viernes 8:30a.m. – 12:00 p.m. **IF NOT OFFERED REPRESENTATION GO TO THE EVICTION DEFENSE NETWORK** ***SI NO LE OFRECEN REPRESENTACIÓN VAYA AL EVICTION DEFENSE NETWORK***	Court were your case is filed M-Th 8:30 a.m. – 4:30 p.m. Closed/Cerrado 12:00 p.m. – 1:30 p.m. Friday/Viernes 8:30a.m. – 12:00 p.m. Free Answers – No representation *Contestaciones gratis – No representación* **AFTER YOUR ANSWER IS FILED GO TO THE EVICTION DEFENSE NETWORK** ***DESPUÉS QUE SU CONTESTACIÓN SEA ARCHIVADA VAYA AL EVICTION DEFENSE NETWORK***	1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 M-Th 9:00 a.m. – 9:00 p.m. (after 6:00 p.m. enter via the rear parking lot) (closed all court holidays check on lasuperiorcourt.org) Friday 9:00 a.m. – 6:00 p.m. (213) 385-8112 **FREE CONSULTATION** **REPRESENTATION ON A SLIDING FEE SCALE.** **PAYMENT PLANS AVAILABLE** ***CONSULTA GRATIS*** ***REPRESENTACIÓN BASADO AL INGRESO*** ***PLAN DE PAGOS DISPONIBLES***

Fair Housing and Bad Conditions/Discriminación y Malas Condiciones



- Asian Americans Advancing Justice (213) 977-7500
- Bet Tzedek Legal Services (323) 939-0506
- Eviction Defense Network 323/863-5015 or stopbadlandlordsnow@edn.la or info@edn.la
- Inner City Law Center (213) 891-2880
- Saban Community Clinic (323) 653-1990
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- Neighborhood Legal Services (800) 433-6251

Discrimination/Discriminación
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Rent Control Enforcement
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- West Hollywood (323) 848-6450
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Housing Conditions/Malas Condiciones
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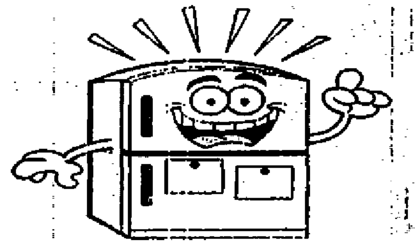
*Staffed by Attorneys
Hours of operation and fees listed subject to change without notice.
Edited 6/11/2017

TENANTS – LEGAL RESOURCES
INQUILINOS – RECURSO LEGALES



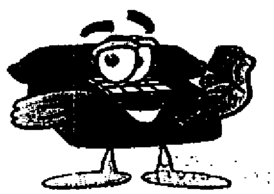
No appointments. Walk in. Free consultations. Donation welcome
No necesita cita. Consulta gratis. Donaciones bienvenidas

MON / LUNES	TUES / MARTES	WED/MIERCOLES	THURS/JUEVES	FRIDAY/VIERNES	SAT/SABADO
EVICTION DEFENSE NETWORK* 1930 Wilshire Blvd #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. - 9:00 p.m.	**EVICTION DEFENSE NETWORK*** 1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. - 9:00 p.m.	**EVICTION DEFENSE NETWORK*** 1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. - 9:00 p.m.	**EVICTION DEFENSE NETWORK*** 1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. - 9:00 p.m.	**EVICTION DEFENSE NETWORK*** 1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 9:00 a.m. – 6:00 p.m.	**CES*** 7377 Santa Monica Bl. West Hollywood (213) 252-4411 10:00 a.m.
INNER CITY LAW CENTER* Karsh Family Center 3750 West 6th Street Los Angeles, CA 90020 9-11 a.m.	**SAJE** 152 W. 32ND STREET Los Angeles, CA 90007 (213) 745-9961 4:00 p.m. - 7:00 p.m.	**INNER CITY LAW CENTER*** Karsh Family Center 3750 West 6th Street Los Angeles, CA 90020 9-11 a.m.	**SAJE** 1910 Magnolia Av. Los Angeles, CA 90007 (213) 745-9961 10.30 a.m.-12:30 p.m.	**UNION DE VECINOS** 346 S. Gless St. Los Angeles, CA 90033 (323) 908-3454 4:30 p.m. - 8:00p.m.	**UNION DE VECINOS** 346 S. GLESS ST. Los Angeles, CA (323) 908-3454 10:00a.m. 2:00p.m.
HOUSING LONG BEACH 525 E. 7TH St. #111 Long Beach, CA 90813 (562) 436-8592 4:30 p.m.	**LEGAL AID FOUNDATION*** Karsh Family Center 3750 West 6th Street Los Angeles, CA 90020 (323)801-7987 2nd Tues/2ND Martes 6:00p.m.	**UNION DE VECINOS** 346 S. Gless St. Los Angeles, CA 90033 (323) 908-3454 4:30 p.m. - 8:00 p.m.	**ACCE*** 3655 S. Grant Av. #250 Los Angeles, CA 90007 (888)964-8086 4:00 p.m. - 7:00 p.m.		**LACCLA*** 407 S. Chicago St Boyle Heights CA 310/866-7527 5:15p.m.
INQUILINOS UNIDOS 1930 Wilshire Bl. #801 Los Angeles, CA 90057 (213)436-8592 5:00 p.m.-6:30 p.m.		**LA-CAN** 838 E. 6th Street Los Angeles, CA 90021 (213) 228-0024 4:00 p.m - 7:00p.m.	**BY APPOINTMENT/CON CITA SOLAMENTE** **City of Los Angeles Residents** (213) 986-8266 (Los Angeles Tenants Union) **City and County of Los Angeles:** Free consultations in person walk-in only at the Eviction Defense Network. Paid consultations by phone or by appointment. To arrange for a paid consultation please send an email to info@edn.la or leave a message at 213/385-8112 x 224. **Central Los Angeles Residents** (213) 891-3244 (Inner City Law Center)* Santa Monica Residents (310)899-6200 (LAFLA Santa Monica)* (310)394-0848 (Santa Monicans for Renters Rights) West Hollywood Residents (323) 549-5841 (Bet Tzedek Legal Services)*		
		CES* 7377 Santa Monica Bl. West Hollywood (213) 252-4411 7:00 p.m.			

AFTER AN EVICTION IS FILED / *DESPUÉS DE QUE SE ARCHIVE UN DESALOJO*

SHRIVER PROJECT*	SELF HELP CENTERS*	EVICTION DEFENSE NETWORK*
111 North Hill Street. Room 115 M-Th 8:30 a.m. – 4:30 p.m. Closed/Cerrado 12:00 p.m. – 1:30 p.m. Friday/Viernes 8:30a.m. – 12:00 p.m. IF NOT OFFERED REPRESENTATION GO TO THE EVICTION DEFENSE NETWORK *SI NO LE OFRECEN REPRESENTACIÓN VAYA AL EVICTION DEFENSE NETWORK*	Court were your case is filed M-Th 8:30 a.m. – 4:30 p.m. Closed/Cerrado 12:00 p.m. – 1:30 p.m. Friday/Viernes 8:30a.m. – 12:00 p.m. Free Answers – No representation *Contestaciones gratis – No representación* AFTER YOUR ANSWER IS FILED GO TO THE EVICTION DEFENSE NETWORK *DESPUÉS QUE SU CONTESTACIÓN SEA ARCHIVADA VAYA AL EVICTION DEFENSE NETWORK*	1930 Wilshire Bl. #208 Los Angeles, CA 90057 (213) 385-8112 M-Th 9:00 a.m. – 9:00 p.m. (after 6:00 p.m. enter via the rear parking lot) (closed all court holidays check on lasuperiorcourt.org) Friday 9:00 a.m. – 6:00 p.m. (213) 385-8112 FREE CONSULTATION REPRESENTATION ON A SLIDING FEE SCALE. PAYMENT PLANS AVAILABLE *CONSULTA GRATIS* *REPRESENTACIÓN BASADO AL INGRESO* *PLAN DE PAGOS DISPONIBLES*

Fair Housing and Bad Conditions/Discriminación y Malas Condiciones



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Edited 4/20/2017

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Ensuring Access to Justice and protecting the right to healthy housing in Los Angeles County

TENANT DO'S AND DON'TS
INQUILINOS SI's y NO's

DO: Read and understand what you sign.

SI: Lea y entienda lo que está leyendo

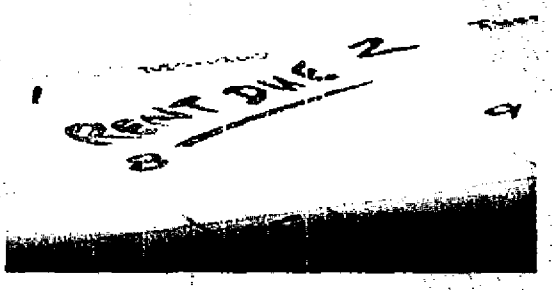
"Sign here to indicate you have no idea what you've signed."

DON'T: Sign anything you don't understand.
NO: Firme documentos que no entienda.
NEVER: Sign these without a lawyer:
NUNCA: Firme estos sin un abogado:

- Estoppel Certificate
- Voluntary Vacate Agreement

DO: Take pictures to document the condition at the unit at moving in and if anything breaks. See numbers on reverse to report bad conditions to the right agency and to find a lawyer.

SI: Tome fotos para documentar las condiciones cuando se mudo y si algo se quebró. Use los numeros al otro lado de esta hoja para reportar malas condiciones a la agencia indicada y para contratar un abogado/a.



DO: Pay the rent on time.
DON'T: Pay cash.

SI: Pague la renta a tiempo.
NO: Pague en efectivo.

DO: Get valid receipts.

SI: Obtenga recibos validos

WHEN YOU MOVE OUT

DO: Give 30 days' written notice.
DO: Ask for a move out inspection and take pictures.

CUANDO SE MUDA DE LA UNIDAD

SI: De una notificación de 30 días
SI: Pida una inspección y tome fotos

edn

DO: Talk to a lawyer at the first sign of trouble

SI: Busque un abogado a la primera señal de un problema

Eviction Defense Network
1930 Wilshire Blvd. | Suite 208 | Los Angeles, CA 90057 | phone 213.385.8112 | fax 213.385.8181
Web: edn.la A California 501(c)(3) Nonprofit Organization

Walk in Services. Open M-Th 9AM to 9PM and Friday 9AM to 6PM

Rev. 4/16/201

LARSO Legislative Fixes
6/17/2017
Proposed by the Eviction Defense Network

Definition of Boarding House: A Los Angeles Rent Stabilization Ordinance (hereinafter LARSO or the Ordinance) amendment is needed in order to ensure that tenants in Boarding and Rooming houses are protected as was intended by 2003 amendments to LARSO. Boarding and Rooming Houses are exempt from the LARSO except where a tenant occupies for more than 30 consecutive days. We have recently lost several cases (some are on appeal) where the judge ignored the testimony of Susan Gosden who is the HCID expert RSO Determinations. The problem is with the definitions section in the Zoning laws. Please see Tab 3 for additional information.

> **Solution:** Definition fix to make it clear that a single family home where the owner chooses to rent up to five rooms or group of rooms become protected if a tenant remains for 30 days. Also make it clear that if an owner is renting more than 5 rooms in a single family home, the use is illegal and a hotel license is needed. Also clarify what kind of licensing is needed to rent rooms in your home.

Protections for Tenants in illegally Subdivided Houses: Tenants in illegally subdivided single family homes have no protection once the illegal subdivision is removed. Judges have ruled that tenants in what was once an illegal duplex no longer have protection because the use has been returned to the original use even in cases where the owner used illegal self help to tear down the offending wall. The owner, who has profited from the illegal use benefits and is not penalized in any way. The tenants are either evicted, face large rent increases or are forced to live in a single family home with shared kitchens even though they once rented

> **Solution:** An Ordinance change that specifically states that once a unit is subject to LARSO, it cannot be decontrolled except under one of the 14 reasons for eviction.

Protections for Tenants in the Legal Unit once an illegal unit is removed: Landlords successfully argue that once an illegal/unpermitted unit is removed the legal unit is unprotected. Again, the owner, who has profited from the illegal use benefits and is not penalized in any way. The tenants are evicted or face large rent increases.

> **Solution:** An Ordinance change that specifically states that once a unit is subject to LARSO, it cannot be decontrolled except under one of the 14 reasons for eviction.

Additional/Replacement Tenant Regulations: The Ordinance and the Regulations regarding Replacement and Additional Tenants are not clear.

> **Solution:** The Ordinance itself must be changed to make it clear that a tenant CANNOT be evicted for adding an adult tenant that brings the total number of household members above the original number or for replacing a tenant. Approval that cannot be unreasonably withheld is needed to add a tenant. No such approval is needed to replace a tenant. The Regulations also need to clearly state that, while an owner may have a basis to sue a tenant for damages in a situation where adding or replacing a tenant violates a rental agreement, eviction is not their remedy.

Los Angeles Rent Stabilization Ordinance
LAMC Section 151.02 (Definitions)
With Zoning Definitions in the footnotes
Revised 4/2014

Rental Units. (Amended by Ord. No. 157,385, Eff. 1/24/83.) All dwelling units,[1] efficiency dwelling units,[2] guest rooms,[3] and suites,[4] as defined in Section 12.03 of this Code, and all housing accommodations as defined in Government Code Section 12927,[5] and duplexes and condominiums[6] in the City of Los Angeles, rented or offered for rent for living or dwelling purposes, the land and buildings appurtenant thereto, and all housing services, privileges, furnishings and facilities supplied in connection with the use or occupancy thereof, including garage and parking facilities. **(Sentence Amended by Ord. No. 170,445, Eff. 5/6/95, Oper. 7/5/95.)** This term shall also include mobile homes, whether rent is paid for the mobile home and the land upon which the mobile home is located, or rent is paid for the land alone. Further, it shall include recreational vehicles, as defined in California Civil Code Section 799.29 if located in a mobile home park or recreational vehicle park, whether rent is paid for the recreational vehicle and the land upon which it is located, or rent is paid for the land alone. **(Sentence Amended by Ord. No. 181,744, Eff. 7/15/11.)** The term shall not include:

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[1] **DWELLING UNIT.** A group of two or more rooms, one of which is a kitchen, designed for occupancy by one family for living and sleeping purposes. **(Amended by Ord. No. 107,884, Eff. 9/23/56.)**

[2] **EFFICIENCY DWELLING UNIT.** A room located within an apartment house or apartment hotel used or intended to be used for residential purposes which has a kitchen and living and sleeping quarters combined therein, and which complies with the requirements of Section 91.4930.2 of this Code. **(Added by Ord. No. 138,456. Eff. 5/30/69.)**

[3] **GUEST ROOM.** Any habitable room except a kitchen, designed or used for occupancy by one or more persons and not in a dwelling unit. **(Added by Ord. No. 107,884, Eff. 9/23/56.)**

[4] There is no separate definition of "suits of rooms" in LAMC 12.03

[5] 12927(d) "Housing accommodation" means any building, structure, or portion thereof that is occupied as, or intended for occupancy as, a residence by one or more families and any vacant land that is offered for sale or lease for the construction thereon of any building, structure, or portion thereof intended to be so occupied.

[6] **CONDOMINIUM.** The same as defined by Section 783 of the California Civil Code. **(Added by Ord. No. 151.432. Eff. 10/12/78.)** 783. A condominium is an estate in real property described in Section 4125 or 6542. A condominium may, with respect to the duration of its enjoyment, be either (1) an estate of inheritance or perpetual estate, (2) an estate for life, (3) an estate for years, such as a leasehold or a subleasehold, or (4) any combination of the foregoing.

1. Dwellings, one family,[7] except where two or more dwelling units are located on the same lot. This exception shall not apply to duplexes or condominiums. **(Amended by Ord. No. 170,445, Eff. 5/6/95, Oper. 7/5/95.)**

2. **(Amended by Ord. No. 176,472, Eff. 3/26/05.)** Housing accommodations in hotels, motels, inns, tourist homes and boarding and rooming houses[8] provided that at such time as an accommodation has been occupied as the primary residence of one or more of the same tenants for any period more than 30 days such accommodation shall become a rental unit subject to the provisions of this chapter. The computation of the 30 days shall include days in which the tenant was required to:

(a) move into a different guestroom or efficiency unit before the expiration of 30 days occupancy; or

(b) check out and re-register before the expiration of 30 days occupancy if a purpose was to avoid application of this chapter.

Evidence that an occupant was required to check out and re-register shall create a rebuttable presumption, which shall affect solely the burden of producing evidence, that the housing accommodation is a rental unit subject to the provisions of this chapter.

3. A dwelling unit in a nonprofit stock cooperative while occupied by a shareholder tenant of the nonprofit stock cooperative.

4. Housing accommodations in any hospital; state licensed community care facility; convent; monastery; extended medical care facility; asylum; fraternity or sorority house; or housing accommodations owned, operated or managed by an

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[7] **DWELLING, ONE-FAMILY.** A detached dwelling containing only one dwelling unit. **(Amended by Ord. No. 107,884, Eff. 9/23/56.)**

[8] **BOARDING OR ROOMING HOUSE:** A dwelling containing a single dwelling unit and not more than five guest rooms or suites of rooms, where lodging is provided with or without meals, for compensation. **(Amended by Ord. No. 107,884, Eff. 9/23/56.) DWELLING.** Any residential building, other than an Apartment House, Hotel or Apartment Hotel. **(Amended by Ord. No. 107,884, Eff. 9/23/56.) DWELLING UNIT.** A group of two or more rooms, one of which is a kitchen, designed for occupancy by one family for living and sleeping purposes. **(Amended by Ord. No. 107,884, Eff. 9/23/56.)**

institution of higher education, a high school, or an elementary school for occupancy by its students.

5. Housing accommodations owned and operated by the Los Angeles City Housing Authority, or which a government unit, agency or authority owns, operates, or manages and which are specifically exempted from municipal rent regulation by state or federal law or administrative regulation, or housing accommodations specifically exempted from municipal rent regulation by state or federal law or administrative regulation. This exception shall not apply once the government ownership, operation, management, regulation or rental assistance is discontinued. This exception shall not apply to rental units for which rental assistance is paid pursuant to the Housing Choice Voucher Program codified at 24 CFR part 982, and those units are subject to the provisions of this article to the fullest extent allowed by law. **(Amended by Ord. No. 177,587, Eff. 7/5/06.)**

6. Housing accommodations, located in a structure for which the first Certificate of Occupancy was issued after October 1, 1978, are exempt from provisions of this Chapter. If the property was occupied for residential purposes prior to October 1, 1978 and a Certificate of Occupancy for the subject building was never issued or was not issued until after October 1, 1978, the housing accommodation shall be subject to the provisions of this Chapter if relevant documentation, such as a building permit, establishes that the building was first occupied for residential purposes prior to October 1, 1978. This exception shall not apply to individual mobile home coaches, mobile home parks, individual recreational vehicles or recreational vehicle parks. **(Amended by Ord. No. 181,744, Eff. 7/15/11.)**

7. **Luxury Housing Accommodations**. This exemption shall only apply to housing accommodations which have been issued a certificate from the Department indicating that it has been proven to the Department's satisfaction that the subject housing accommodations were rented at the requisite rent levels on May 31, 1978.

8. **Substantial Renovation**. Housing accommodations for which renovation work was started and completed on or after September 1, 1980 which work cost at least $10,000 for a unit with no bedrooms; $11,000 for a unit with one bedroom; $13,000 for a unit with two bedrooms; $15,000 for a unit with three bedrooms; and $17,000 for a unit with four bedrooms or more. This exemption shall apply only to rental units which have submitted an application for a certification of exemption to the Department prior to October 4, 1989, and which have been issued a certificate from the Department indicating that it has been demonstrated to the satisfaction of the Department that the requisite renovation work has been completed. **(Amended by Ord. No. 165,251, Eff. 11/20/89.)**

9. **(Amended by Ord. No. 181,744, Eff. 7/15/11.) Affordable Housing**

Accommodations are housing accommodations with a government imposed regulatory agreement that has been recorded with the Los Angeles County Recorder, or which shall be recorded within six months of the filing of an exemption pursuant to this Subdivision with the Department, guaranteeing that the subject housing accommodations will be affordable to either lower income or very low income households for a period of at least 55 years, with units affordable only to households with an income at 60 percent of the Area Medium Income or less. None of the subject housing accommodations shall be affordable only to households with incomes greater than 60 percent of the Area Medium Income, as these terms are defined by the U.S. Department of Housing and Urban Development. "Lower Income or very low income households" is defined in accordance with California Health and Safety Code Sections 50079.5 and 50105.

This exemption shall apply only to housing accommodations which have been issued an affordable housing exemption by the Department indicating satisfaction of the following conditions:

(1) the subject housing accommodations are only available to lower income or very low income households with none of the subject accommodations affordable only to households with income greater than 60% of Area Median Income;

(2) rent levels conform to the amounts set by the U.S. Department of Housing and Urban Development, or the California Department of Housing and Community Development, as applicable, based on the public funding source for the subject accommodations; except as follows:

Annual rent increases shall be in accordance with LAMC Section 151.06 D. for any tenancies established prior to the recording of the government imposed regulatory agreement where the tenant household has not received permanent relocation assistance in accordance with the Uniform Relocation Act, the California Relocation Assistance Act or LAMC Section 151.09 G., whichever is applicable;

(3) actions to recover possession of housing accommodations from a tenant shall be limited to the grounds set forth in LAMC Section 151.09 A.;

(4) the landlord shall comply with the provisions of the Tenant Habitability Program, pursuant to Article 2 of this Chapter, if applicable;

(5) relocation assistance shall be provided to an eligible tenant

household based on the applicable provisions of the Uniform Relocation Act or the California Relocation Assistance Act; or the amount set forth in LAMC Section 151.09 G., whichever is greater.

The Department shall have the authority to revoke an exemption issued pursuant to this Subdivision for failure to adhere to any of the conditions for an exemption set forth in this Subdivision.

10. Recreational vehicles which are not occupied by a tenant who has continuously resided in the park for nine or more months. This exception shall not apply to a lot or space which becomes vacant as a result of the park operator's terminating the tenancy on grounds other than those specified in Section 151.09 A. of this chapter.

11. Housing accommodations in limited-equity housing cooperatives, as defined in Health and Safety Code Section 33007.5, when occupied by a member tenant of the limited-equity housing cooperative. However, if the cooperative acquired the property pursuant to Government Code Section 54237(d), then all dwellings in the limited-equity housing cooperative shall be excepted from this chapter. **(Added by Ord. No. 157,723, Eff. 7/1/83.)**

12. Any mobilehome park for which a permit to operate is defined in Chapter 4 of Part 2.1 of Division 13 of the California Health and Safety Code was first issued on or after the effective date of this amendment (hereafter "**existing park**"). If acreage is added to a mobilehome park which park obtained a permit to operate prior to the effective date of this amendment, then any site located on such additional acreage shall be exempt from the provisions of this chapter. Any new home sites created within the boundaries of an existing park through increased density or elimination of open space shall not be subject to this exception. **(Added by Ord. No. 160,791, Eff. 2/10/86.)**

Google Groups

Letter for Council File #14-1635-S3 & #14-1635-S2

Anthony Rollins Jun 13, 2017 12:34 PM

Posted in group: **Clerk-PLUM-Committee**

Please see attached letter for the PLUM committee

Thank you!

Mercury.

Anthony Rollins
Senior Associate
444 South Flower Street | Suite 3675
Los Angeles, CA | 90071
213.624.1380 office | 310.801.8036 mobile
213.624.1387 fax
www.mercuryllc.com

TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

June 13, 2017

The Honorable Members of the Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

CC: The Honorable Mayor Eric Garcetti
Vince Bertoni, Director of the Los Angeles City Planning Department

Re: CF #14-1635-S2 & CF #14-1635-S3 - Supporting the innovation economy and economic growth in the City of Los Angeles

Dear Members of the Los Angeles City Council,

TechNet, which represents over 70 members, including breakthrough startups and the most storied, life-changing technology companies on the planet, keeps America's innovation economy growing and creating good-paying jobs. TechNet is committed to supporting Los Angeles' economic growth and prosperity. We are proud to have many of our member companies contributing every second, minute, hour and day to the city's economy, providing thousands of high-skilled jobs for Angelenos. We write to you today to ask for your support of the innovation industry and its contributions to the economic growth of the city of Los Angeles. A critical component to this is the sharing economy, which is pivotal to creating a 21st century economy that works for everyone.

Too often, we see well-intentioned regulations stifle innovation. As the City of Los Angeles begins to consider changes to its short-term rental rules, we hope the Council will take into consideration the consequences both for middle class families who share their homes to make ends meet and for companies that do business in Los Angeles.

Fostering innovation in the peer-to-peer economy is important to the prosperity and longevity of the Los Angeles economy. Home sharing in particular has helped democratize income for middle class families in Los Angeles by providing them with additional income to make ends meet and help them stay in their homes as the cost of living in the city rises.

Short-term rentals also play a vital role in the local travel and tourism economies. Last year, more than one million visitors stayed at Airbnb listings across the city and generated over a billion dollars in economic activity. These visitors support small and emerging businesses and bring much needed economic opportunity to

neighborhoods that have not traditionally benefitted from the city's tourism industry.

In addition, since enacting the tax agreement with the City of Los Angeles, hosts and guests on the home sharing platform, Airbnb, have generated $24 million in taxes that give lawmakers the flexibility to support programs that benefit Angelenos.

We recognize the benefits that technology and the sharing economy can have for residents of Los Angeles and we strive to promote sensible innovation and rules that democratize economic prosperity, foster innovation, and empower individuals.

We look forward to working with you and industry leaders, community advocates and other elected officials who share our commitment to building bridges between technology and public policy to find workable solutions that will better serve the future of Los Angeles.

Should you wish to discuss TechNet's request here or our perspective, I can be reached at adeveau@technet.org or on my cell at (805) 234-5481.

Sincerely,
Andrea Deveau
Vice President, State Policy and Politics