

Communication from Public

Name: The Oaks Homeowners Association
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Council File No: 18-1245
Comments for Public Posting: Please accept the attached comment letter from Oaks Homeowners Association into CF # 18-1245.



July 8, 2020

Los Angeles City Council PLUM Committee
Department of City Planning
Planning Commissioners

Re: Homesharing Regulation, CF 18-1245

Dear Councilmembers, Planning Department and Commissioners,

We are the homeowners association representing approximately eight hundred homes in the Oaks neighborhood of Los Feliz (between Fern Dell Drive and Canyon Drive). We write to you regarding proposed amendments to Home Sharing Ordinance. While your focus at this moment is on home-sharing in rent-stabilized residences, we want to take this opportunity to expand the conversation to urgently needed changes in the Ordinance as regards illegal/unregistered short-term rentals, particularly those used to create party houses. These problematic rentals have created serious quality-of-life issues in neighborhoods like ours and the current Ordinance does not go nearly far enough to correct all of the problems regarding these nuisance situations. There are three issues that need addressing: transparency of home-share information, enforcement of home-share regulations, and meaningful penalties for violators of the ordinance.

Within our neighborhood there are currently three homes being rented out by the weekend or by the day or even by the hour principally for large party groups. These party situations, even in normal times are loud and disruptive and severely reduce quality of life for neighbors. However as we are all living through a viral pandemic, these mostly nighttime gatherings of large numbers of people for celebrations, drinking and drug use pose a true threat to public health and safety.

Some of these home-shares are registered with the City; some are not. Those that are registered are often registered deceitfully or fraudulently by persons claiming to live at the homes but who do not. In both cases, the City is unaware of registration violations and of violations of home-share rules and practices. The neighbors of these properties are often aware of both sorts of violations but have difficulty communicating these facts to the City because it is not clear to them what the lines of authority are regarding home-sharing in residential

neighborhoods. There are a number of city agencies that deal with home-sharing (the Planning Department, the Department of Building & Safety, LAPD, the City Attorney's office) and so it's not apparent where to take specific concerns.

A good first step to clearing up the confusion would be to have a transparent Home Share registration system that can be viewed by all online. For example, Home Share registrations could appear on LADBS's online "Permit and Inspection Report" much like building permits and code violations. Currently, the Planning Department website directs inquiries to a non-working email address for more information.

Enforcement of the existing ordinance is also a significant problem. Based on our experience, there seems to be a problem getting the right person out to the home-share in question to witness what is actually taking place. The current enforcement arms do not have the time to cover the many complaints that come in, and their level of expertise may not be what is needed for these situations. LAPD is not always needed to issue a citation for a loud party and a Building inspector from LADBS is not needed to issue a ticket for a pile of trash in the front yard or in the street. If Los Angeles had a code enforcement division that focused on quality-of-life issues like these, and if violators could be issued multiple citations by the home share unit (violators currently cannot until the previous citation is paid or the operator exhausts their ninety-day appeal period), we feel there would be quicker resolutions to problems like ours. An enforcement arm also needs to be able periodically to verify that the home share operator qualifies for Home Sharing and is fulfilling the six-month residency requirements of the current ordinance.

Finally, we feel strongly that there need to be meaningful penalties that outweigh the financial gains of illegal Home Shares and disruptive party houses. When operators are making tens of thousands of dollars renting properties out illegally, a five-hundred dollar citation is viewed merely as the cost of doing business. Financial penalties need to be commensurate with the scale of the violating enterprise. The threat of not being able to Home Share in the future is meaningless when the property in question is developer-owned with a project for the site in plan check. In such cases, an effective penalty would be the threat of a Building Permit Moratorium for a period of time to be determined. Thank you for your consideration of these important issues.

Sincerely,
Holly Purcell
President

Cc: Councilmember David Ryu, Nick Greif, Emma Howard