



June 23, 2016

Mr. David Ambroz, President  
Los Angeles City Planning Commission  
200 North Spring Street, Room 532  
Los Angeles, California 90012

**RE: CF 14-1635-S2 Short-Term Rentals Ordinance**

Dear Mr. Ambroz:

Thank you for considering this important issue and the Department of City Planning's draft of the proposed ordinance regulating short-term rentals. I am supportive of an ordinance that provides reasonable and thoughtful regulations for the home-sharing and short-term rentals industry and look forward to public review.

As written, I have some concerns with the current draft, and ask that you and your commission review the following:

**Separate Home Sharing vs. Whole Home Rentals**

There is a large difference between whole home rentals and home sharing. As noted on Page 12 of the Planning Department report, home-sharing where the host is on site is typically not an issue in terms of neighborhood nuisances or the loss of rental units on the market. This is absolutely true in my district where whole home rentals make up almost all of the complaints I receive. I disagree with the Department's assertion that it is "virtually impossible" to differentiate the two types of listings and to instead increase the days allowed for rentals to 120 days across the board will solve none of the problems in my district. 120 days could mean whole home rentals every day of the year or throughout the entire travel season in the Summer. I ask that the Commission consider splitting home-sharing from whole home rentals, limiting whole home rentals to below 60 days (any more makes the property akin to a vacation rental), and allowing hosts the ability to home-share year round. This would eliminate a majority of the problems in my district and reduce the regulatory burden on both the City and our residents.

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### **Party Houses — CFs 12-1824 and 12-1824-S1**

As noted on Page 16 of the Planning Department Report, my office has been working with the City Attorney, LAPD, and the Planning Department on enhancing enforcement on Party Houses. These, along with the loss of rental housing stock, are the two biggest issues driving this ordinance. Approval of the Party House rules my office has proposed, which would prevent both further parties or short term rentals at properties tagged as having violated an expanded loud and unruly gathering law, will address this nuisance issue in a way this STR ordinance cannot and thus should be approved as soon as possible if we want to see real remedies in our neighborhoods.

### **Proactive Enforcement**

I am pleased to see that the Planning Department report advocates using some of the revenue gained from STRs for proactive enforcement, as I requested in my letter to the Department on May 20, 2016. We cannot approve yet another law with rules and restrictions that we do not adequately fund enforcement for.

Thank you again for your work to address this critical issue in the most thorough and effective manner. I look forward to reviewing your recommendations.

Sincerely,



David E. Ryu  
Councilmember

CC: Vince Bertoni, Planning Director