

Google Groups

Fwd: Council File 14-1635-S3

Zina Cheng

Jun 14, 2017 2:36 PM

Posted in group: **Clerk-PLUM-Committee*******NOTE TO LA CITY STAFF**********Please Cc sharon.dickinson@lacity.org on all emails related to PLUM Committee.*****

Zina Cheng
Deputy City Clerk/Legislative Assistant for:
Energy and Environment Committee
Health, Mental Health, and Education Committee
Planning and Land Use Management Committee

City of Los Angeles, Office of the City Clerk
Council and Public Services
(213) 978-1537
zina.cheng@lacity.org

Forwarded conversationSubject: **Council File 14-1635-S3**

From: **Stacy Lona** <stacy.lona@airbnb.com>
Date: Mon, Jun 12, 2017 at 6:24 PM
To: Sharon.dickinson@lacity.org, zina.cheng@lacity.org
Cc: Arturo.Chavez@lacity.org, Gerald.Gubatan@lacity.org

Dear Ms. Dickinson and Ms. Cheng,

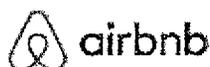
Attached please find letters of support for sensible short-term rental regulations, addressing the Planning and Land Use Committee's discussion of Council File 14-1635-S3, from the following organizations:

United Way Greater Los Angeles
Little Tokyo Service Center
Travel Tech

Will you please include these letters and statements in the council file and distribute them to the members of the Planning and Land Use Committee?

Thank you very much for your assistance with this matter. Please let me know if you need any additional information.

Best regards,



Stacy Lona
Program Coordinator
Los Angeles
(626) 543-3181

From: **Stacy Lona** <stacy.lona@airbnb.com>
Date: Mon, Jun 12, 2017 at 6:31 PM
To: Sharon.dickinson@lacity.org, zina.cheng@lacity.org
Cc: Solomon.Rivera@lacity.org, Lynell.Washington@lacity.org

Dear Ms. Dickinson and Ms. Cheng,

Attached please find letters of support for sensible short-term rental regulations, addressing the Planning and Land Use Committee's discussion of Council File 14-1635-S3, from the following organizations:

Koreatown Youth and Community Center
National Immigration Forum
Consumer Watchdog

Will you please include these letters and statements in the council file and distribute them to the members of the Planning and Land Use Committee?

Thank you very much for your assistance with this matter. Please let me know if you need any additional information.

Best regards,



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Program Coordinator
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(626) 543-3181

From: **Stacy Lona** <stacy.lona@airbnb.com>
Date: Mon, Jun 12, 2017 at 6:35 PM
To: Sharon.dickinson@lacity.org, zina.cheng@lacity.org
Cc: Curtis.Earnest@lacity.org, Robert.Katherman@lacity.org

Dear Ms. Dickinson and Ms. Cheng,

Attached please find letters of support for sensible short-term rental regulations, addressing the Planning and Land Use Committee's discussion of Council File 14-1635-S3, from the following organizations:

Greater Los Angeles African American Chamber of Commerce
Consumer Technology Association
CAL Innovates

Will you please include these letters and statements in the council file and distribute them to the members of the Planning and Land Use Committee?

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Los Angeles
(626) 543-3181

From: **Stacy Lona** <stacy.lona@airbnb.com>
Date: Mon, Jun 12, 2017 at 6:43 PM
To: Sharon.dickinson@lacity.org, zina.cheng@lacity.org
Cc: john.lee@lacity.org, hannah.lee@lacity.org

Dear Ms. Dickinson and Ms. Cheng,

Attached please find letters of support for sensible short-term rental regulations, addressing the Planning and Land Use Committee's discussion of Council File 14-1635-S3, from the following organizations:

California Affordable Housing Development Association
Los Angeles Latino Chamber of Commerce

Will you please include these letters and statements in the council file and distribute them to the members of the Planning and Land Use Committee?

Thank you very much for your assistance with this matter. Please let me know if you need any additional information.

Best regards,



Stacy Lona
Program Coordinator
Los Angeles
(626) 543-3181



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,

A handwritten signature in black ink, appearing to read 'D. M.', is positioned above the typed name.

Dean Matsubayashi
Executive Director



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.

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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,

A handwritten signature in cursive script that reads "Elise Buik".

Elise Buik
President & CEO



June 6, 2016

Los Angeles City Planning Commission
200 North Street
Los Angeles, CA 90012

Dear President Ambroz, Vice President Wilson and Members of the Planning Commission,

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, TripAdvisor/FlipKey, and Airbnb. As you are aware, short-term rental technology companies have created a vibrant marketplace for travelers and property owners, expanding the travel landscape by offering alternative accommodations and providing economic benefits to many communities around the world. With that in mind, Travel Tech writes to voice its concern with the Planning Department's staff recommendations for a draft ordinance to regulate short-term rentals in Los Angeles.

Travel Tech believes that municipal legislation that seeks to deputize Internet platforms for enforcement purposes, by either stating or implying the need for these platforms to police and regulate third party users under the threat of punitive consequences from local government, is a flawed and short-sighted approach to enforcing municipal laws.

Collectively, our members help owners, operators, and hosts connect travelers with hundreds of thousands of properties around the globe. In the United States alone there are nearly forty thousand municipalities, many of whom have existing ordinances or regulations that are specifically designed for, or may be applicable to short-term rentals. With that in mind, expecting short-term rental platforms to determine the status or legality of a specific property listing is virtually impossible to achieve with any accuracy, which renders the proposed ordinance unfeasible.

But beyond the lack of workability, it is even more important to recognize that holding short-term rental platforms accountable for user-generated content flies in the face of the very underpinnings of the federal law that has governed the liability of platforms and users for nearly two decades. The legal certainty provided by Section 230 of the Communications Decency Act established an environment that promotes innovation and has allowed the Internet to thrive.

Congress passed Section 230 in 1996, addressing the treatment of online service providers and platforms, stating, "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" (47 U.S.C. § 230). This ensures that an Internet service or platform is not recognized as the publisher when facilitating the speech of a third party. Many courts have upheld a broad interpretation of this law, declaring that intermediaries are not held liable for user-generated content. In short, Section 230 has been enormously important to the growth of the Internet by providing legal certainty to an ever-expanding world of Internet services, including but not limited to social media, blogs, consumer review sites and forums, search engines, audio and video hosting platforms, online marketplaces, and in the case of our members, travel and accommodations intermediaries and platforms.



The proposed recommendations would require platforms to vet the eligibility of listings and prevent, remove, and cancel any non-compliant listings. The failure to do so would result in fines for the platform. This clearly imposes a level of liability on short-term rental platforms and undermines the preemption contained in Section 230 that “no liability may be imposed under any State or local law,” by the passage of laws in direct conflict with it. In a larger context, should state and local governments begin creating a series of laws inconsistent with Section 230, the result would be a legal quagmire that leaves the cities, the platforms, the hosts and travelers in a state of legal and operational uncertainty, benefitting no one.

Furthermore, local governments should not be in the business of picking and choosing whose property rights to protect and to what degree. Widely recognized as fundamental property rights, is the ability to buy, rent or sell one’s home. Limiting renting, beyond simple registration and/or an inspection, effectively removes one of those three core rights. Infringing on a homeowners’ ability to rent their property sets a dangerous precedent. Practically speaking, in cities throughout the country, occupancy and residency requirements for short-term rentals have proven both ineffective and unenforceable, and implementing these requirements merely creates the illusion of regulation rather than concrete policy solutions.

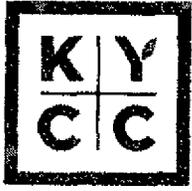
It is also worth noting that even though the staff’s recommendations would provide for a formalized tax scheme, as currently constructed, millions of dollars in transient occupancy taxes presently being collected by the city of Los Angeles on short-term rentals would disappear from the city’s revenue stream with the elimination of secondary or traditional vacation rentals.

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 for short-term rentals must adequately address enforcement and compliance without undermining the legal foundation upon which Internet providers, platforms, and homeowners have come to rely for protection. As such, we urge the City Planning Commission to reconsider these recommendations and instead seek a public policy proposal that promotes innovation and recognizes the value of short-term rentals to the city of Los Angeles.

Travel Tech and its member companies are available to the city as a resource, and we would welcome the opportunity to work with the City on short-term rental regulation.

Sincerely,

Matthew Kiessling
The Travel Technology Association



Administrative Office
3727 W. 6th Street, Suite 300
Los Angeles, CA 90020
T (213) 365-7400
F (213) 927-0017
E info@kyccla.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 travelers 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,

John Ho Song
Executive Director



December 5, 2016

The Honorable Eric Garcetti
Mayor of Los Angeles
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

Dear Mayor Garcetti:

The National Immigration Forum is one of the leading immigrant advocacy organizations in the country, with a mission to advocate for the value of immigrants and immigration to the nation. Founded in 1982, the Forum plays a leading role in the national debate about immigration, knitting together innovative alliances across diverse faith, labor, law enforcement, veterans and business constituencies in communities across the country. Leveraging our policy, advocacy and communications expertise, the Forum works to ensure that new Americans have the opportunities, skills, and status to reach their full potential.

For the better part of this past decade, as technology has come to play a greater role in society, a wide range of “peer to peer” businesses have developed that allow everyone to become an entrepreneur.

Today, we are releasing a new report, “Immigrants sharing homes: Opening doors to opportunity” which highlights how some immigrants are able to embrace opportunities provided by the sharing economy through platforms like Airbnb and provide an economic lifeline for themselves and their families and the communities they call home. Home sharing platforms like Airbnb can provide much-needed supplemental income for immigrants to this nation, a group making the transition to a new life in an unfamiliar place.

Additionally, a recent Airbnb report, “The Impact of Airbnb on Middle Class Income Stagnation” found that the majority of Airbnb hosts are working families who rent out their primary residence and earn approximately \$7,530 in supplemental income per year. That extra income represents a 14 percent annual raise and is the equivalent of real household income growing 0.5 percent over inflation for the past 15 years. According to Airbnb, throughout New York, Los Angeles, and Chicago, hosts in majority-immigrant neighborhoods have earned over \$24 million dollars hosting on Airbnb and have seen 65% growth in active Airbnb listings in the past year.

In our new report, we share the experiences of eight immigrants and their families participating as Airbnb hosts and the positive impact that experience has had on their ability to pursue the American dream. One of these people is America Lopez. America and her twin sister are 25 years old and have been helping their immigrant parents with hosting through Airbnb. The money they have earned through participating with Airbnb has allowed them to pay for college while competing in startup competitions and teaching kids how to code as a second language.

As your community continues to consider short-term rental rules and policies, we urge you to consider this report and the experiences of immigrants in Los Angeles. We strongly believe that

smart policies can regulate these new activities while ensuring immigrants across the country are still able to access opportunities afforded by the sharing economy.

Sincerely,

A handwritten signature in black ink, appearing to be 'Ali Noorani', with a long horizontal stroke extending to the right.

Ali Noorani
Executive Director



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 Angeles 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?

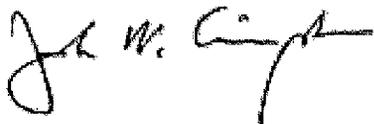
The legitimacy of sweeping government demands for Internet users' transactional and personal data is a key privacy question of our time. Requiring e-commerce sites to turn over personal data so enforcement officials can scour through records and search for potential violations of local laws amounts to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

A handwritten signature in black ink, appearing to read "John M. Simpson". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

John M. Simpson
Privacy Project Director

Cc: Mayor Eric Garcetti, City Council, City Clerk



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

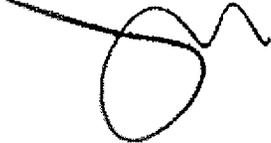
particularly insecure and easily hacked. Forcing the home sharing platforms to collect this information and share it with the city puts these users at risk and will discourage them from continuing to use home sharing platforms.

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

June 6, 2016
City Planning Commission
Page 3

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,

A handwritten signature in black ink, appearing to read "Mike Montgomery". The signature is fluid and cursive, with a large loop for the letter 'M' and a wavy line for the end of the name.

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

Consumer Technology Association

1919 S. Eads St.
Arlington, VA 22202
703-907-7600
CTA.tech

June 13, 2016

Department of City Planning
City Hall, 200 North Spring Street, Room 525
Los Angeles, CA 90012-2601

Dear Los Angeles City Planning Commission:

On behalf of the Consumer Technology Association (CTA)TM and our more than 2,200 member companies, I would like to express strong concerns with Draft Ordinance CPC-2016-1243-CA. Of particular concern is Section 3(f), which would create unrealistic requirements for homesharing platforms to police listings.

Internet homesharing platforms enhance consumer choice and offer economic opportunity for individual citizens and communities at large. In fact, 62 percent of Los Angeles Airbnb hosts use homesharing income to help them stay in their home. The listings provided by these hosts on homesharing platforms not only give visitors a greater variety of lodging options – these visitors also typically spend much of their money in local neighborhoods. Last year Airbnb alone is estimated to have supported \$670 million in economic activity in Los Angeles.

Requiring homesharing platforms to play the role of law enforcement by certifying all listings on their sites meet local regulations would violate the spirit of protections Congress applied to online service providers when enacting the Communications Decency Act of 1996 (CDA). CDA Section 230 provides immunity to online intermediaries based on content created by others. In granting intermediaries safe harbor from content posted by users, Congress facilitated the growth of the modern internet.

To hold intermediaries liable would chill innovation and dissuade platforms from hosting online content created by others. For example, if intermediaries such as YouTube, Facebook, Craigslist and Airbnb were held legally responsible for the millions of pieces of content users posted each day, these sites would be operationally crippled.

Due to this potential conflict with federal law and the negative effect on Los Angeles residents' ability to earn extra income from their homes, I urge you to oppose Draft Ordinance CPC-2016-1243-CA as currently written. CTA and our member companies look forward to working with you to ensure Los Angeles remains a top-tier city for innovative technologies such as homesharing.

Sincerely,



Gary Shapiro
President and CEO
Consumer Technology Association





**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,

Board Members

Gene Hale, *Chairman*
Karim Webb, *Vice Chairman*
Angela Gibson, *President*
Abdi Ahmed, *Vice President*
Douglas L. Hall, *Secretary*
Jamarah Hayner, *Treasurer*

Directors

Kelli Bernard
Darrell R. Brown
Timothy Coffey
Lemuel Daniels
Donovan Green
Walter Hill, Jr.
Tavio Hobson
Clifton Johnson
Ronald A. Lowe
Lily Otieno
Anthony Ozogu
Starlett Quarles
Byron K. Reed
Ron Walden

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 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 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

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



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.*

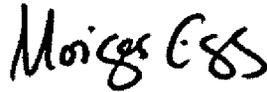
As home sharing continues to grow in popularity, it is also becoming an economic empowerment tool for thousands of Angelenos. Residents throughout Los Angeles can help avoid foreclosure, eviction – and cover the cost of expenses, by sharing their home or a room in their home, on a short-term basis. The 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:

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