

Message to Planning Staff 6/10/19

From: <info@pacpalicc.org>
To: <cally.hardy@lacity.org>, <matthew.glesne@lacity.org>
Cc: <mike.bonin@lacity.org>, <vince.bertononi@lacity.org>, <tricia.keane@lacity.org>, Tom Rothmann <tom.rothmann@lacity.org>, <krista.kline@lacity.org>, <chair@westsidecouncils.com>, George Wolfberg <wolfbergg@gmail.com>, <ppfriends3@hotmail.com>
Sent: 6/10/2019 10:03 AM
Subject: Home-sharing (STRs) Ordinance – Administrative Guidelines

Dear Ms. Hardy and Mr. Glesne:

I am Secretary and a past Chair of Pacific Palisades Community Council (PPCC) -- the most broad-based community organization and voice of the Palisades for 46 years. Since 2015, and during the terms of three PPCC Chairs/Presidents, PPCC has been actively engaged in the City's efforts to enact a Home-Sharing (Short-Rentals/STRs Ordinance).

I'm writing now about the administrative regulations (guidelines) that are being drafted in connection with the STRs Ordinance. We've recently learned that there will be a "demonstration" in PLUM on **June 18** regarding applications for STR permits; it's unclear whether the draft guidelines will be presented at that time or whether they will be posted online in advance for review and input by neighborhood or community councils. Since there apparently won't be a formal "notice and hearing" procedure for comment on the guidelines, please allow us to provide our input now.

Here are two provisions that we urge you to include in any administrative regulations or guidelines regarding the STRs application process:

1) **Sufficient proof of primary residence and liability insurance for the specific use.**

Both PPCC and the Westside Regional Alliance of Councils (WRAC; an alliance of all 14 currently established Neighborhood and Community Councils on the Westside of Los Angeles, including PPCC) disfavor "self-certification" of residence and have long-advocated for adequate proof of the host's primary residency as well as liability insurance. See [PPCC 2015 Motion, October 2015 Letter](#), [September 2018 Letter](#) and [WRAC letter](#). PPCC has specifically noted:

"All hosts shall obtain a City permit and a permanent registration number. The condition receiving a City permit and permanent registration number shall be the following: Primary residence" shall be defined as the usual place of return for housing as documented by at least two of the following: motor vehicle registration, driver license, voter registration, tax documents showing the unit as the host's residence for the purposes of a homeowner's tax exemption, or a utility bill."

We request that the guidelines include these requirements and that "self-certification" not be included as an option.

2) **A "hot-line" or other streamlined process to register complaints & concerns.**

PPCC has requested establishment of a 24/7 hotline for neighboring residents to register issues, complaints and/or concerns about short-term rentals located near them. See [April 2018 Letter](#). We request that the guidelines provide for such a process.

PPCC has also requested inclusion of additional provisions that may be considered "administrative" in nature (as called for in our 2015 Motion linked above), including:

- requiring verification that the host's property complies with the Building Code and that all necessary repairs have been made
- requiring the host to include their permanent City registration number on all advertised listings in all media.
- requiring the host to disclose such information as the City deems required for enforcement, such as the type of rental whether one room or whole house, how many nights per year, how many guests and the like.

We also assume you'll be including a requirement for posting "no smoking" signs on outside areas of the host's property in High Fire Hazard Severity zones (as I believe is provided for in the last iteration of the adopted ordinance).

Thank you very much for your assistance.

Sincerely,

Chris Spitz
Secretary
Pacific Palisades Community Council
www.pacpalicc.org