

Communication from Public

Name: Iris Craige

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Council File No: 14-1635-S10

Comments for Public Posting: 12 March 2025 Dear Members of the Los Angeles City Council, Strategic Actions for a Just Economy (SAJE) writes to you in support of all recommendations to improve the Los Angeles' Home-Sharing Ordinance (HSO) made at the December 4th, 2024 Housing & Homelessness Committee meeting. As the state's homelessness crisis continues to worsen and the region looks to rebuild after the devastating wildfires, it is vital that the City Council take the necessary steps to increase enforcement of the HSO and protect housing stock in Los Angeles through the elimination of illegal short-term rental operations. SAJE builds community power and leadership for economic justice. Through our work with tenants facing displacement and our advocacy for stronger housing protections, we see firsthand how illegal short-term rentals strip away much-needed housing and destabilize communities. The City's failure to effectively regulate STRs directly harms the working-class residents we organize with—many of whom are already burdened by rising rents and the aftermath of recent disasters. Strengthening enforcement of the HSO is a critical step toward preventing further displacement and ensuring that housing remains accessible to long-term tenants. Hosts Use Numerous Tactics to Evade the HSO. As the City continues to struggle with enforcement of the HSO, hosts continue to evade the law by using fraudulent registration numbers or claiming false exemptions. According to Better Neighbor LA's analysis of Inside Airbnb data, in January of 2025 there were 1,233 listings on Airbnb without valid registration numbers, many of which were clearly fraudulent. For example, 637 listings have duplicate registration numbers, and 33 listings have fake registration numbers. The other 563 listings are either missing a registration number or listing expired registration numbers. Similarly, in January 2025, at least 275 listings improperly claimed to be exempt from the HSO. Hosts use these tactics to circumvent the HSO for their own financial gain, while residents across the City continue to face on-going housing affordability challenges that have been exacerbated by the destruction caused by the recent wildfires. The City must take meaningful steps to improve enforcement of the HSO to protect existing housing stock for long-term tenants. SAJE supports all recommendations made at the December 4th, 2024 Housing and Homelessness Committee

and urges the City Council to approve this set of recommendations. Included in this set are two key recommendations that are critical to eradicating illegal operations, specifically: Amending the HSO to include a private right of action, which would allow those impacted by illegal short-term rental activity to pursue legal action against both hosts and platforms. Neighboring cities like Santa Monica and West Hollywood already have this in place. The residents of Los Angeles should be afforded the same tool to pursue relief from bad actors, especially as the City continues to struggle with enforcement. Amending the HSO to include an electronic verification system. This would require platforms to affirmatively verify a listing as compliant with the HSO prior to the completion of a booking transaction. This would help eliminate bad actors, such as those who make false claims on their listings to circumvent the HSO. Furthermore, this provision would place greater responsibility on platforms, rather than the City, to ensure listings are compliant. Moving forward with all 13 recommendations as set forth in the Housing and Homelessness Committee to improve the HSO is an opportunity for the City Council to take a meaningful step forward to protect and preserve housing for long-term residents in Los Angeles by providing both residents and the City with additional enforcement tools. As the impacts of the recent wildfires on the existing housing crisis are made clearer in the coming months, it is imperative that the City takes immediate steps to ensure no more housing units are lost to the illegal short-term rental market. For these reasons, we encourage the Council to move forward with this set of pivotal recommendations. Should you have any questions, please contact Iris Craige. Best, Iris Craige Assistant Director of Policy and Research



12 March 2025

Dear Members of the Los Angeles City Council,

Strategic Actions for a Just Economy (SAJE) writes to you in support of all recommendations to improve the Los Angeles' Home-Sharing Ordinance (HSO) made at the December 4th, 2024 Housing & Homelessness Committee meeting.¹ As the state's homelessness crisis continues to worsen and the region looks to rebuild after the devastating wildfires, it is vital that the City Council take the necessary steps to increase enforcement of the HSO and protect housing stock in Los Angeles through the elimination of illegal short-term rental operations.

SAJE builds community power and leadership for economic justice. Through our work with tenants facing displacement and our advocacy for stronger housing protections, we see firsthand how illegal short-term rentals strip away much-needed housing and destabilize communities. The City's failure to effectively regulate STRs directly harms the working-class residents we organize with—many of whom are already burdened by rising rents and the aftermath of recent disasters. Strengthening enforcement of the HSO is a critical step toward preventing further displacement and ensuring that housing remains accessible to long-term tenants.

Hosts Use Numerous Tactics to Evade the HSO. As the City continues to struggle with enforcement of the HSO, hosts continue to evade the law by using fraudulent registration numbers or claiming false exemptions. According to Better Neighbor LA's analysis of Inside Airbnb data, in January of 2025 there were 1,233 listings on Airbnb without valid registration numbers, many of which were clearly fraudulent. For example, 637 listings have duplicate registration numbers, and 33 listings have fake registration numbers. The other 563 listings are either missing a registration number or listing expired registration numbers.² Similarly, in January 2025, at least 275 listings improperly claimed to be exempt from the HSO. Hosts use these tactics to circumvent the HSO for their own financial gain, while residents across the City continue to face on-going housing affordability challenges that have been exacerbated by the destruction caused by the recent wildfires.

The City must take meaningful steps to improve enforcement of the HSO to protect existing housing stock for long-term tenants. SAJE supports all recommendations made at the December 4th, 2024 Housing and Homelessness Committee and urges the City Council to approve this set of recommendations. Included in this set are two key recommendations that are critical to eradicating illegal operations, specifically:

- **Amending the HSO to include a private right of action**, which would allow those impacted by illegal short-term rental activity to pursue legal action against both hosts and platforms. Neighboring cities like Santa Monica and West Hollywood already have this in

¹ https://clkrep.lacity.org/online/docs/2014/14-1635-S10_misc_HH_12-4-24.pdf

² Data on file with BNLA, Inside Airbnb: <https://insideairbnb.com/>.



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place.³ The residents of Los Angeles should be afforded the same tool to pursue relief from bad actors, especially as the City continues to struggle with enforcement.

- **Amending the HSO to include an electronic verification system.** This would require platforms to affirmatively verify a listing as compliant with the HSO prior to the completion of a booking transaction. This would help eliminate bad actors, such as those who make false claims on their listings to circumvent the HSO. Furthermore, this provision would place greater responsibility on platforms, rather than the City, to ensure listings are compliant.

Moving forward with all 13 recommendations as set forth in the Housing and Homelessness Committee to improve the HSO is an opportunity for the City Council to take a meaningful step forward to protect and preserve housing for long-term residents in Los Angeles by providing both residents and the City with additional enforcement tools. As the impacts of the recent wildfires on the existing housing crisis are made clearer in the coming months, it is imperative that the City takes immediate steps to ensure no more housing units are lost to the illegal short-term rental market. For these reasons, we encourage the Council to move forward with this set of pivotal recommendations. Should you have any questions, please contact Iris Craige.

Best,

Iris Craige

Assistant Director of Policy and Research

³ City of Santa Monica: <https://ecode360.com/42735174> ; City of West Hollywood: <https://ecode360.com/43917308>