

## Communication from Public

**Name:**

**Date Submitted:** 10/31/2023 02:19 PM

**Council File No:** 14-1635-S10

**Comments for Public Posting:** Please see the attached letter on behalf of Expedia Group, commenting on the recent report from Department of City Planning. Do not hesitate to reach out with any questions, or if you'd like to discuss this further.



October 31, 2023

Los Angeles City Council  
City of Los Angeles  
200 N. Spring Street  
Los Angeles, CA 90012

**RE: Department of Planning's Home-Sharing Ordinance Report**

Mayor Bass and Members of the City Council,

Earlier this month, the Los Angeles City Council received a report ("Report") regarding the City's Home Sharing Ordinance ("HSO"). The Report, authored by the Planning Department, was requested by the Council last year with the aim of understanding current enforcement activities as well as the Department's plan to "better coordinate data tracking of non-compliant properties."

Expedia Group, a family of travel brands including Expedia.com, Hotels.com, and Vrbo (formerly "HomeAway"), has played an important role in the City's travel and tourism economy for decades. We are proud of the partnerships we have built with city, county, and state governments in California and around the world to help balance the needs of a strong, equitable, and vibrant travel economy with local priorities such as housing accessibility and affordability, community character, and economic diversity and stability.

In this spirit of collaboration, we write to bring your attention to some elements of the report that do not match our understanding of the facts and history of the HSO:

The Report characterizes the outcome of the City's suit against HomeAway/Vrbo as "the court ultimately rul[ing] in the City's favor by requiring HomeAway/Vrbo to adhere to a compliance plan." In fact, the parties settled "instead of engaging in protracted and costly litigation." While the report states that HomeAway/Vrbo "was made to pay \$150,000 in civil penalties," HomeAway/Vrbo *voluntarily* made a settlement payment merely to bring an end to litigation. In the agreement, HomeAway/Vrbo expressly disclaimed any "fault or concession of liability" but agreed that the City could refer to "the payment as [Unfair Competition Law] penalties *for internal accounting purposes*" [emphasis added] and for tax reasons only.

The Report celebrates the success of the City's compliance agreement with Airbnb, describing it as "one of the most useful tools the City has to enforce the HSO," "a significant advantage to the City," and asserting that it has allowed the City to "ma[ke] great progress in removing non-



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compliant short-term rental listings.” We suggest the Council examine these claims critically. In fact, the City’s own records tell a different story.

The City reports that, as of that June 13, 2023, Airbnb had 6,227 "current active short-term rental listings." On the same day, the City listed only 4,928 active registrations on its “Allow List” of Home-Sharing Units. Assuming for sake of argument that the operators of every single registered unit in the City chose to list their units on Airbnb, this would still mean that nearly 1,300 unregistered units were allowed on the platform, more than 20% of Airbnb’s total inventory in Los Angeles. The ineffectiveness of the City’s agreement with Airbnb has been reported by news outlets such as [Los Angeles Times](#), [LAist](#), and [others](#).

In general, Expedia Group does not oppose, and often encourages, governments to enter into agreements with online platforms that describe a shared understanding of each party’s ongoing obligations related to a short-term rental ordinance. Memoranda of Understanding or platform agreements can be useful—even vital—in ensuring a high rate of compliance with local short-term rental laws and equitable enforcement of hosting platforms’ obligations. For example, the City Council of Seal Beach, CA, recently ratified a Memorandum of Understanding with Expedia Group that is set to deliver on the City’s enforcement goals. We encourage you to assess the effectiveness of Los Angeles’s existing platform agreement(s) through this lens.

We look forward to discussing our efforts to maintain a high rate of compliance with the law and interest in continued collaboration with the City Council, Planning Department, and other interested parties in public policy conversations going forward. Please feel free to contact me at [astinson@expediagroup.com](mailto:astinson@expediagroup.com) with any questions or to discuss this further.

Thank you,

A handwritten signature in grey ink, appearing to read "Alyssa Stinson".

Alyssa Stinson  
Government and Corporate Affairs  
Expedia Group

