



California Apartment Association
Long Beach
111 W. Ocean Boulevard, Suite 400
Long Beach, CA 90802
424.307.1375 • caanet.org

November 30, 2018

Honorable Mayor Garcia and City Council
City of Long Beach
333 W Ocean Blvd, 14th Floor
Long Beach, CA 90802

**RE: Agenda Item: 21 18-1072
Short Term Rental Ordinance**

Dear Honorable Mayor and City Council,

On behalf of the California Apartment Association (CAA), I am writing to share our thoughts and suggestions on policy recommendations regarding the Short-Term Rental (STR) Ordinance which is currently under consideration by Council. The Apartment Association has a deep commitment to upholding the highest standards in the rental housing industry as well as a commitment to creating housing for all in Long Beach. From advocating in the halls of our nation's capital, the offices of our leaders in Sacramento and our local council chambers, we strive to add our expertise to decision makers as they craft good and effective policy.

Managing a community is complex. It is the housing provider who is responsible for the operations of the building and caring for their community. On any given day managers must help resolve community disputes, conduct needed repairs, provide customer service, oversee vacancies, resolve nuisances and ensure the community operates in a way all residents can enjoy the shared space. Tenants in apartments who list with short-term rental websites can create safety issues for their neighbors and the community. Short-term guests have had no screening or background checks, and keys or gate codes are given out by the listing tenant to strangers.

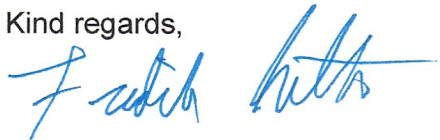
CAA supports the provisions that protect the housing provider's ability to operate their communities and prohibits the circumnavigation of a lease agreement. Although lease agreements are the primary protection for communities, they can be time consuming and expensive to enforce. We encourage the council to maintain additional protections currently being considered and ensure mechanisms deter illegal activity. Specifically:

- *We encourage the council to maintain provisions which allow rental owner inclusion on a STR prohibition list. Once an owner requests this prohibition, short term rental platforms should be prohibited from considering an STR at the location and a City registration number should not be granted.*

- *The rental owner consent form should be expanded to include an explicit written permission by the owner for any sharing conducted by a community member regardless of lease presence. Housing providers must have knowledge of sharing in their communities.*
- *Any monetary fine or other enforcement action for illegally engaging in a short-term rental should be incurred by the aggrieving party. In the present state, it is difficult for the housing provider to monitor and catch an illegal short-term rental in their building. Any enforcement mechanism should take into consideration the actions of the party responsible for the illegal rental.*

CAA applauds the City for addressing this emerging technology. No community is the same and housing providers must be able to make decisions that are best for their communities. The ability and need to remove a multifamily property from home sharing consideration, mandating explicit written consent and protecting the integrity of a lease agreement is a fair request. Thank you and please do not hesitate to give me a call with any questions or concerns.

Kind regards,



Frederick Sutton
Vice President, Public Affairs
California Apartment Association
424.307.1378