

## Kimberly Rodrigues

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**From:** Cindy Bankler <cindy@kibreneman.com>  
**Sent:** Wednesday, January 25, 2023 3:03 PM  
**To:** Comments  
**Subject:** Agenda CC 01-25-23

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To the Honorable Mayor and Members of the City Counsel:

I live on Captains Place and we have two short-term rentals on our street. This is a business for these owners. I do not want to live across from a business where different people are coming and going. I am very aware of the families that live on my street and with the constant flow of new people in and out I need to be vigilant for my safety when I see someone I don't know. The customers speed down the street and have no regard for the families that live here. The business that is right across the street from me has its trash cans out 24/7 as no one cares for this property until its rented out. Additionally, it may not be a problem now but short term rentals take away long term rentals from the market and in time, ?

I see that you are considering the Report to City Counsel by the Community Development Director and essentially it seems that they just want this regulated and for them to pay taxes. I do not want short-term rentals to be allowed in Agoura Hills.

*Cindy Bankler*

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## Kimberly Rodrigues

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**From:** Allison Kirste <akirste@betterneighborsla.org>  
**Sent:** Wednesday, January 25, 2023 3:07 PM  
**To:** Comments  
**Subject:** BNLA Written Comment Letter RE Agoura Hills Council Item No. 6  
**Attachments:** BNLA Letter RE Agoura Hills Proposed STR Regulations.pdf

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Hello,

Please see the attached written comment from Better Neighbors LA and Unite HERE! Local 11 regarding agenda item number 6: Ordinance No. 23-467.

Thank you for your attention to this matter.

Best,  
Allison

Allison Kirste (she/her)  
BETTER NEIGHBORS LA  
akirste@betterneighborsla.org





**UNITE  
HERE!  
LOCAL 11**

January 25, 2023

SENT BY ELECTRONIC MAIL ONLY TO:  
comments@agourahillscity.org

Dear Agoura Hills City Council:

Better Neighbors LA (BNLA) and Unite HERE! Local 11 write to express our support for strong and bright-line regulations of short-term rentals (STRs) in Agoura Hills. STRs, which pose a growing threat to housing stocks across Southern California, must be strictly regulated in order to prevent the wholesale conversion of housing units into tourist accommodation. The proposed Ordinance fails to protect Agoura Hills housing and its residents from the adverse impact of the commercial operation of STRs in residential areas. For that reason, BNLA recommends that Agoura Hills reject the current proposed ordinance and instead follow the lead of municipalities across the state that demand accountability from STR operators and platforms.

**Agoura Hills' Proposed Ordinance is Inadequate**

Agoura Hills' proposed STR Ordinance lacks basic protections and enforceability. Increasingly, municipalities are protecting their housing by limiting STRs to primary residences. This ensures that STRs operate as home-shares instead of commercial operations with little or no oversight. Agoura Hills' proposal has no residency requirement and allows STRs to operate full time without limit in any property throughout the City.

Additionally, Agoura Hills' proposed ordinance expressly permits singular hosts to operate multiple short-term rentals. Allowance of such operations will undoubtedly pose problems with the City's housing stock as the law does not give a clear explanation of when hosting multiple units is not allowed. The proposed ordinance is unlikely to be effectively enforceable due to the many ambiguities. Our own experience in advocating for enforcement of regulations against short-term rentals have taught us that even the most bright-line regulations can at times be difficult to enforce. It's likely that the City of Agoura Hills will have similar, if not worse, struggles in interpreting, upholding, and enforcing this proposed ordinance.

Increasingly, municipalities throughout California have come to recognize that an important aspect of STR regulation is platform accountability. STR websites, or "platforms" profit from cities' housing and infrastructure, often without accountability or responsibility. The Agoura Hills' proposed STR Ordinance takes no step to hold any platform accountable such as sharing information about STR rentals, or prohibiting platforms from listing illegal unregistered STRs. Without platform accountability, Agoura Hills' ability to enforce its rules and regulations will be severely hindered as it is forced to chase violations across platforms and listings that pop up and disappear overnight.



**Affordable and Income-Restricted Housing is Threatened**

Income-restricted housing units across Southern California provide vital affordable and reliable housing for families, young people, and working professionals. Any new regulations permitting STRs must protect long-term tenants and support affordable housing initiatives, including state-wide rent-stabilization regulations. Agoura Hills should protect income-restricted and other affordable housing from being converted into dedicated STRs by expressly disallowing their use as STRs, and invest in the infrastructure necessary to identify illegal listings and take appropriate enforcement measures.

**Commercial Operators Abound**

Research shows that the majority of STR profits are garnered by commercial operators running dozens of STRs at the same time, often under pseudonyms. These commercial operators profit from taking housing off of the market and contribute to rising rents. These rentals run unsupervised, which is a danger to guests and a detriment to neighbors. Agoura Hills should seek to impose penalties that will disincentivize such use of housing units, and ensure that STR operations are in compliance with local regulations that restrict hosts to only one short-term rental.

**STRs Create Nuisance**

BNLA routinely hears from neighbors who describe the difficulties they face when an STR operates next door. They report large crowds, loud parties, and guests with little incentive to clean up after themselves or maintain the quality of the neighborhood. Often, when STRs are not closely regulated, neighbors complain of de-facto hotels or “party houses” that rotate in strangers and unknown safety threats on a regular basis, often with no one present at the property to hold accountable or respond to complaints. BNLA supports STR regulation to protect true home sharing as well as neighbors and neighborhoods. It is our recommendation that Agoura Hills limit the number of permitted STRs to an amount that Agoura Hills is adequately prepared to regulate and monitor as well as respond to neighborhood complaints effectively and timely.

BNLA is happy to meet with Council and Planning Staff to further discuss our experiences with STR regulations and offer expertise on the matter. We hope that the Council will do the right thing and bolster its regulations while limiting the number of STRs it allows to operate so as to protect housing, neighborhoods, and residents from the adverse impacts of short-term rentals.

Sincerely,

/s/ Nancy Hanna

/s/ Danielle Wilson

Better Neighbors LA

Unite HERE Local 11