

September 17, 2024

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, CA 90012

Dear Supervisors:

**HEARING ON SHORT-TERM RENTALS TITLE 22 ORDINANCE AMENDMENT  
PROJECT NO. PRJ2023-002077-(1-5)  
ADVANCE PLANNING CASE NO. RPPL2023-003020-(1-5)  
(ALL SUPERVISORIAL DISTRICTS) (3-VOTES)**

**SUBJECT**

The recommended action is the Short-Term Rentals ("STR") Title 22 Ordinance Amendment (Ordinance Amendment), which is an amendment to Title 22 (Planning and Zoning) of the Los Angeles County Code ("County Code") to ensure consistency and facilitate the implementation of the Los Angeles County ("County") Short-Term Rentals Ordinance ("STR Ordinance") established in Division 3 (STR) of Title 7 (Business Licenses) and adopted by the Board on April 19, 2024. The County Treasurer and Tax Collector ("TTC") is the department administering the STR Ordinance and the County's STR Program.

**IT IS RECOMMENDED THAT THE BOARD AFTER THE PUBLIC HEARING,**

1. Certify that the Ordinance Amendment is not subject to the California Environmental Quality Act ("CEQA") because it is not a project under CEQA, pursuant to section 21065 of the Public Resources Code, section 15378 of the State CEQA Guidelines, and the County's Environmental Document Reporting Procedures and Guidelines. Additionally, it is exempt from CEQA, pursuant to 15061(b)(3) of the CEQA Guidelines because it can be seen with certainty that the action will not have a significant adverse impact on the environment. Finally, even if it can be considered a project under CEQA, it qualifies for a Class 1 Categorical Exemption, pursuant to section 15301 of the CEQA Guidelines and the County's Environmental Document Reporting Procedures and Guidelines.

2. Indicate its intent to approve the Ordinance Amendment (Advance Planning Case No. RPPL2023003020) as recommended by the Regional Planning Commission ("RPC"); and
3. Instruct County Counsel to prepare the necessary final documents amending Title 22 of the County Code for the Board's consideration.

### **PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION**

On March 19, 2019, the County Board of Supervisors ("Board") directed the preparation of an ordinance to regulate STRs in the unincorporated County. The motion aimed to strike a balance between the economic benefits of short-term rentals and the negative impacts to housing stock, neighborhood character, and quality of life for residents.

On February 13, 2024, the Board held a public hearing on an ordinance brought by the TTC that incorporates a new Division 3 (Short-Term Rentals Registration) in Title 7 (Business Licenses) of the County Code (the STR Ordinance). The Board directed changes and the STR Ordinance returned to the Board for introduction on March 19, 2024. On April 9, 2024, the Board adopted the STR Ordinance. As part of the adoption, the Board directed the Department of Regional Planning ("Regional Planning") to prepare an ordinance amending Title 22 to ensure the applicability of the STR Ordinance throughout the unincorporated areas and to strengthen the County's ability to enforce the new STR regulations.

On April 24, 2024, the RPC held a public hearing to consider the Ordinance Amendment. The RPC recommended that the Board adopt the Ordinance Amendment, which is included as Attachment 1 and includes a non-substantive revision to correct a numbering error, and a resolution from the RPC with its recommendation, included as Attachment 2. A summary of the RPC proceedings is included as Attachment 3.

### **Key Components**

A STR is a primary residence, or portion thereof, used for the purposes of providing temporary lodging for compensation for occupancy of 30 consecutive calendar days or less.

The Ordinance Amendment implements the recently adopted STR Ordinance. It allows STRs as an accessory use to existing dwelling units in zones that permit residential uses to align the County Zoning Code with the STR Ordinance. The remainder of the Ordinance Amendment is guided by the STR Ordinance, which requires STRs to be registered with the TTC and renewed annually; limits STRs to registered primary residences only (with the exception of accessory dwelling units, which are prohibited from STR use); limits the number of days in a calendar year a primary residence can be rented without a host present overnight; and limits the number of guests allowed. The Ordinance Amendment also prohibits the use of non-habitable and temporary structures for STR, and any other habitable structures other than dwelling units.

Including these provisions in Title 22 allows for additional enforcement of STR regulations by Regional Planning's Zoning Enforcement division.

The Ordinance Amendment also maintains an existing policy in Title 22 of the County Code to prohibit the use of accessory dwelling units for STR purposes, previously adopted by the Board as part of the County's Accessory Dwelling Unit Ordinance. The Ordinance Amendment applies throughout the unincorporated areas of Los Angeles County, except for the County's Coastal Zones, which will separately incorporate the STR Program into the County's local coastal programs ("LCP") at a later date; and the Santa Monica Mountains North Area, which is not located in the Coastal Zone, but was specifically directed by the Board as part of the STR Ordinance adoption to be withheld from the application of the STR Ordinance until STR regulations are incorporated into and effective for the Santa Monica Mountains LCP.

### **Implementation of Strategic Plan Goals**

Adoption of the Ordinance Amendment implements Strategic Plan North Star 1, Focus Area C Housing and Homelessness, and Strategy **i**. Affordable Housing by supporting the County's STR Program, which provides a balanced approach to allowing STRs while protecting rental housing stock for permanent housing, and thereby mitigating potential housing displacement.

### **FISCAL IMPACT/FINANCING**

Adoption of the Ordinance Amendment will not result in additional costs to the County.

### **FACTS AND PROVISIONS/LEGAL REQUIREMENTS**

In addition to the public hearing conducted by the RPC on April 24, 2024, a public hearing before the Board is required, pursuant to Section 22.232.040.B.1 of the County Code and section 65856 of the California Government Code. Required notice was provided pursuant to the requirements set forth in Section 22.222.180 of the County Code.

### **ENVIRONMENTAL DOCUMENTATION**

The Ordinance Amendment is not subject to CEQA because it is not a project under CEQA, pursuant to section 21065 of the Public Resources Code, section 15378 of the State CEQA Guidelines, and the County's Environmental Document Reporting Procedures and Guidelines. Additionally, it is exempt from CEQA, pursuant to 15061(b)(3) of the CEQA Guidelines because it can be seen with certainty that the action will not have a significant adverse impact on the environment. Finally, even if it can be considered a project under CEQA, it qualifies for a Class 1 Categorical Exemption, pursuant to section 15301 of the CEQA Guidelines and the County's Environmental Document Reporting Procedures and Guidelines. A draft Notice of Exemption, included as Attachment 4, was prepared for the Ordinance Amendment.

**IMPACT ON CURRENT SERVICES (OR PROJECTS)**

Approval of the Ordinance Amendment will not significantly impact County services.

For further information on the Ordinance, please contact Brian McGinnis, Regional Planner, Zoning Enforcement West Section, at (213) 974-6457 or [bmcginnis@planning.lacounty.gov](mailto:bmcginnis@planning.lacounty.gov).

Respectfully submitted,

AMY J. BODEK, AICP  
Director of Regional Planning

AJB:CC/ER

Attachments:

1. Draft Ordinance Amendment
2. RPC Resolution
3. Summary of RPC Public Hearing Proceedings
4. Draft Notice of Exemption

c: Executive Office, Board of Supervisors  
Chief Executive Office  
County Counsel  
Treasurer and Tax Collector

S\_09\_17\_2024\_AP\_BL\_SHORT-TERM\_RENTALS\_TITLE 22\_ORDINANCE.