



The Los Angeles Home-Sharing Ordinance 2021 Enforcement Report and Recommendations



A report by Better Neighbors Los Angeles



THE VILLAGE
WELCOME

ACCESSIBLE
ROUTE

STOP

NO TRUMP



About Us

In 2014, a coalition of housing advocates, neighborhood groups, businesses, and workers formed around the concern that short-term rentals listed on online platforms, at that time almost exclusively Airbnb, were taking housing off the market at an alarming rate. They saw it in the wholesale conversion of apartment buildings into unregulated hotels in Venice, the appearance of 24/7 party houses in Hollywood, and the loss of affordable housing for tenants and workers across Los Angeles.

This unusual alliance of tenants, homeowners, businesses, workers, and others began advocating for the City of Los Angeles (“City”) to pass regulations to limit the spread of commercial short-term rentals and to protect the City’s affordable housing. After a long campaign, the Los Angeles City Council adopted the Home-Sharing Ordinance (“HSO” or the “Ordinance”), Ordinance No. 185931, in 2018. The Ordinance restricts short-term rentals to a host’s primary residence for a limited amount of time during a year and prohibits the use of rent-stabilized (rent-controlled) units as short-term rentals. Hosts must register with the City and post their registration number on any listing.

In 2020, Better Neighbors Los Angeles (“BNLA”) grew out of the coalition that fought for regulation of short-term rentals to ensure effective enforcement of the City’s Home Sharing Ordinance. Our mission is to protect affordable housing, neighborhoods, tax revenue, and jobs by protecting the goals and intent of the HSO, and advocating for stronger, more effective enforcement against illegal short-term rentals in the City of Los Angeles and across Southern California.

To meet that goal, we provide regulators and City Councilmembers with the latest research, data analysis, and recommendations to improve enforcement using the tools already available. Additionally, we advocate for the creation of short-term rental ordinances in neighboring cities and provide information from our experience with illegal short-term rentals in Los Angeles to better inform the creation of such policy. We have also provided data to show when proposed changes to the HSO would undo its original goals. Furthermore, BNLA runs a hotline that residents can call to receive help with short-term rental issues in their neighborhood, and we advocate for residents impacted by illegal short-term rentals.

Some examples of our work over the past year include drafting and providing the City seven enforcement reports with recommendations for improving enforcement. In addition, we have provided testimony at Los Angeles City Council meetings and committees, as well as Inglewood City Council meetings and California Coastal Commission meetings. Through our hotline and public education campaign, we have assisted residents of Los Angeles with making 28 complaints of alleged illegal short-term rental (“STR”) activity to the Los Angeles Department of City Planning (“DCP”) and provided follow-up to ensure residents’ complaints were acted upon by DCP. In addition to our advocacy, BNLA has held several community events to educate and mobilize residents around protecting their neighborhood from illegal commercial short-term rentals and to bring public attention to these violations. By providing recommendations to support enforcement of the HSO and advocating for residents disturbed by illegal short-term rentals, BNLA serves as a resource for residents, elected officials, and the government agencies tasked with enforcement of the HSO.

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Executive Summary

The advent of commercial online home sharing platforms, like Airbnb, turned what once was a practice of renting out a room or couch to make a couple of extra dollars, into a lucrative industry in which homeowners, renters, and landlords alike take part. As this industry grew, it exacerbated an already great strain on our City's limited stock of affordable housing, our hotel industry and hotel jobs, and the cohesion of our communities. Though enforcement has come a long way since the passage of the Home-Sharing Ordinance, there still exist gaps that hosts regularly exploit to evade complying with the law.

This report evaluates the state of home sharing in the City of Los Angeles and the enforcement of the Home-Sharing Ordinance, details our understanding of the numerous ways hosts violate the HSO, and makes recommendations for more effective enforcement.



Recommendations



Increase Data Collection and Transparency

Access to complete data on the short-term rental (“STR”) market is critical to effective enforcement. We recommend the Los Angeles Department of City Planning (“DCP”) work with its contractor Host Compliance to increase the effectiveness of their data collection so as not to leave gaps in the identification of illegal STRs. Additionally, DCP should provide a means for residents of the City to verify if short-term rentals neighboring them are legal or not.



Streamline and Coordinate Enforcement Across Departments

Unnecessary delays and excess bureaucracy dilute the impact of enforcement, especially when hosts know they can drag out the process and still operate rentals during that time. DCP should streamline the administrative hearing process and cite on the first offense as well as coordinate enforcement with other relevant City agencies.



Target and Prioritize Enforcement for the Greatest Impact

Given the size of the short-term rental market and the finite resources of the City, DCP must prioritize certain violations for enforcement and use available tools to target enforcement on the most egregious violators. For example, enforcing the HSO for illegal short-term rentals operating out of properties protected under the Rent Stabilization Ordinance (“RSO”) should be a top priority of DCP. To do that, DCP should log formal complaints from the public which would trigger an immediate investigation.



Use All Available Enforcement Tools to Deter Serial Violators

The financial incentives for engaging in illegal STR activity are high, which means that enforcement actions must be aggressive enough to create a deterrent to violators. An example of this would be making fines high enough to deter future illegal activity. Hosts that list prohibited properties, such as rent-stabilized units, should have their operations effectively shut down and not be allowed to simply pay a fine and resume operations. The City should also engage the City Attorney to take legal action against hosts and platforms who refuse to comply with the law.



Enforce all parts of the HSO

The primary focus of DCP's short term rental enforcement efforts have been limited to ministerial tasks such as ensuring that hosts have filed the forms necessary to obtain a registration number and have paid the required fees. DCP has largely ignored other violations of the Ordinance, including rentals of prohibited units, including rent stabilized housing; rentals of unregistered listings; rentals of units that are not the host's primary residence; hosts that list more than one property; hosts that have failed to obtain their landlord's consent to rent the unit; listings that do not include a valid registration number; rentals that consistently generate noise or safety complaints from neighbors; and violations of the 120 day rental cap.



Increase Accountability of Regulators and Platforms

Enforcement requires not just funding and procedures, it requires City agencies to hold global corporations, along with smaller commercial enterprises, accountable for violations. It requires the will to impose fines large enough to deter scofflaws. DCP must hold accountable the online platforms, like Airbnb, VRBO, and many others, that enable and profit from illegal short-term rentals. Elected officials must hold DCP accountable and give them the political backing they need to effectively enforce the Ordinance the City Council passed.





Introduction

Home-sharing has been around for decades, historically practiced by individual homeowners choosing to rent out spare rooms or couches to travelers or to lease out their homes while they traveled for work. In 2009, Airbnb's global business model rapidly transformed home-sharing into a lucrative vacation rentals market, bringing in billions in revenue and fueling the large-scale conversion of housing stock into tourist accommodations. The commercialization of home-sharing by Airbnb, and the many online short-term rental platforms it spawned, has fundamentally altered the housing market, the hospitality industry, and neighborhoods and communities across the globe.

The rapid growth of the online Short-Term Rental ("STR") industry in the City of Los Angeles quickly created problems at a scale that drew the attention of policy makers and advocates. In 2014, a coalition of housing, neighborhood, and worker advocates recognized that the online STR platforms (such as Airbnb and others) were taking housing units, previously used for long-term residences, off the market at an alarming rate. The unregulated spread of short-term rentals worsened the housing crisis for Los Angeles residents as more and more housing was converted into vacation rentals. The coalition began advocating for the City of LA to pass regulations for short-term rentals to preserve affordable housing for residents.

In 2018, the Los Angeles City Council passed the Home-Sharing Ordinance ("HSO"), Ordinance No. 185931, to regulate short-term rental activity by putting limitations on the activity, requiring registration by hosts and reporting by host platforms, and providing for robust enforcement measures.¹ By enacting this regulation, the City intended to "protect the City's affordable housing stock" by restricting home-sharing to a host's "registered primary residence" and by limiting home-sharing to housing units zoned and authorized for transient use.² The HSO tasks the Department of City Planning ("DCP") with enforcement, and authorizes other agencies to assist with enforcement.³

Evidence suggests that thoughtful regulation of short-term rentals can have positive results. A 2021 article in the *Journal of Urban Economics* analyzed 2014-2018 data from Airbnb, the County Assessor, and Zillow for L.A. County, and found that regulations typically reduce the number of Airbnb listings by half and reduced both housing prices and rent by two percent on average. The authors concluded that regulations like the HSO may "lead to a reallocation away from privately-owned [STR] housing towards the long-term rental market."

The effectiveness of the HSO in restoring housing and curbing the other negative impacts of unfettered activity, like most regulations, hinges on its proper implementation and enforcement. Better Neighbors Los Angeles ("BNLA") was formed in 2020 to ensure effective enforcement of the HSO. After a year of work supporting enforcement, BNLA has developed a picture of the Los Angeles STR market, hosts' strategies to evade compliance, and the efficacy of the City's enforcement based on analysis of publicly available data from the City of Los Angeles and from the Airbnb website.

The purpose of this report is to provide data analysis, on-the-ground experience, and BNLA's recommendations to increase and improve enforcement of the HSO with the goal of protecting housing for all Angelenos.



The Adverse Impacts of the Rise in Short-Term Rentals

The development of the online STR industry by Airbnb quickly transformed home-sharing from homeowners renting out their extra rooms to travelers to commercial operators renting out hundreds of units across the globe. Since then, hundreds of other online platforms have emerged, turning home-sharing into a multibillion-dollar global industry, dominated by a small group of powerful companies.

The impacts of the rise in short-term rentals in a community are diverse, STRs affect housing affordability, job availability, and the sense of community that one derives from their neighborhood. As money flooded into the STR market, it created the incentive for landlords, speculators, investors, and commercial operators to buy housing units to convert into short-term rentals by whatever means necessary. These conversions only exacerbate the scarcity of housing, driving up rent, and fueling evictions. Hospitality workers lose jobs due to competition from unregulated, unstaffed “hotels.” And local government loses tax revenue from occupancy taxes. Finally, conversions of residential properties into unregulated “hotels” disrupts community cohesion and safety. The increase in travelers means, among other things, that there are fewer families to send kids to schools or use playgrounds and parks.

In many places, the large-scale conversion of housing units to commercial STRs has resulted in a reduction in housing supply and an increase in rent. A McGill University study of New York City estimated a 1.4% increase in median rent over a three-year period due to Airbnb resulting in a \$380 rent increase, annually, for the median New York tenant looking for an apartment in 2018. In some Manhattan neighborhoods, the increase is more than \$700, annually. That same report found that Airbnb alone removed between 7,000 and 13,500 units of housing from New York City’s long-term rental market from 2014 to 2017.⁴

Additionally, New York City’s Controller determined that Airbnb had been responsible for nearly 10% of the total rent increase in that City between 2009 and 2017, meaning that “renters citywide paid a whopping \$616 million in additional rent in 2016 due to the exponential growth of Airbnb listings.”⁵ As summarized by a



2019 Economic Policy Institute study, “Airbnb—though relatively new—is already having a measurable effect on long-term housing supply and prices in some of the major cities where it operates.”⁶ That conclusion is supported by a 2017 paper that analyzed national data and found that Airbnb alone is responsible for about 20% of the average annual increase in U.S. rents.⁷

STRs have also been shown to have an impact on the hotel industry and on hotel jobs. Researchers have demonstrated a link between an increase in STRs in an area and a drop in hotel revenue in that area.⁸ Over the course of 12 months, ending October 31, 2021, STRs in L.A. had generated a direct revenue of \$133 million. Increased STR presence in an area can be linked to lower hospitality worker wages.⁹ L.A.’s hospitality industry has been hit particularly hard by the economic impacts of the Covid-19 pandemic, and over 11,000 L.A. County hotel workers remain out of work as of November 2021.¹⁰ According to recent reporting in the L.A. Times, hotel housekeepers lucky enough to be called back to work have returned to find fewer hours and a harder job.¹¹

The impact of STRs on community cohesion and safety is difficult to quantify. Yet, there is a reason that zoning laws evolved to separate commercial zones, where hotels, restaurants and bars operate, from residential neighborhoods where children play. Anecdotal evidence suggests that the increased STR traffic takes up parking, creates noise and litter, and generally disrupts residential neighborhoods. By extension, the large-scale conversion of housing to STRs will likely impact communities by reducing the number of children enrolled in schools and participation in community organizations.

The restrictions and limitations included in the HSO were designed to mitigate the negative consequences of an unregulated STR market. Los Angeles Councilmember Mike Bonin, of Council District 11, spoke at length about the negative consequences of “bad” short-term rentals in a Council meeting in 2018. He described these “bad” rentals as “rogue hotel operators who are robbing the residents of [the] City of rental housing and making gentrification ... and the affordable housing crisis worse.” Primarily for this reason, the Council chose to limit short-term rental activity to a host’s primary residence.

Regulation of STR Activity in the City of Los Angeles

Effective enforcement of the HSO requires, as a foundation, an understanding of the specifics of the regulations, the current state of the market, as well as trends and dynamics that shape it. This section reviews the HSO, the current state of the STR market in Los Angeles, and the methodology used to analyze the data available.

The Home Sharing Ordinance Explained

The HSO defines Home-Sharing as “an accessory use of a Host’s Primary Residence for a maximum of 120 days in a calendar year for the purpose of providing Short-Term Rental in compliance with the registration and other requirements of Los Angeles Municipal Code Section 12.22 A 32.”¹² The HSO defines a short-term rental as any housing unit “rented... for transient use of 30 consecutive days or less.” The HSO puts restrictions only on STRs, and not a unit rented for more than 30 days, referred to in the industry as a long-term rental (“LTR”).¹³ The HSO includes four key components designed to prevent the conversion of long-term housing to STRs and to mitigate the negative impacts of STR activities on neighbors:

- A listing must be the host’s primary residence, defined as where “the Host resides for more than six months of the calendar year.”
- A host must register with DCP and be issued a registration number. (The annual registration costs \$183.) The registration number is unique to that host and to that housing unit. Any online listing or advertisement must “clearly list” the registration number.
- Hosts may not rent out an STR for more than 120 nights in a calendar year without an Extended Home Sharing (EHS) permit. Hosts with an EHS permit (which has annual registration costs of approximately \$1,000) may rent a unit out for up to 365 nights.
- Platforms are prohibited from processing transactions for noncompliant STRs and are required to share basic information on bookings with DCP.

The HSO defines “host” as “an individual who is registered for Home-Sharing as the term is defined in Section 12.03 of this Code.”¹⁴ (See above definition of Home-Sharing.)

The HSO defines “hosting platform” as “a person that participates in Short-Term Rental business by collecting or receiving a fee, directly or indirectly through an agent or intermediary, for conducting a Booking Service transaction using any medium of facilitation.”¹⁵

The HSO includes a small number of exceptions:

- Entirely exempt from the restrictions of the HSO are “city-approved hotels, motels, Transient Occupancy Residential Structures (“TORS”), and bed and breakfasts.”
- The HSO identifies “categorically ineligible” units prohibited from being listed as STRs, including rent-controlled units, units that fall under affordable housing covenants, and accessory dwelling units (“ADUs”) built after 2016.

The HSO authorizes several departments and mechanisms to enforce the Ordinance:

- The Director [of City Planning] may, at any time, require the modification, discontinuance, or revocation of any Home-Sharing registration.
- The ACE program may be utilized to issue administrative citations and impose fines on both hosts and platforms, which the City Attorney’s office, Los Angeles Housing Department (“LAHD”), and Los Angeles Department of Building and Safety (“LADBS”) may all use to enforce the HSO.
- In addition, any criminal, civil, or other legal remedy established by law may be pursued to address violations.

Additional Tools for Implementation of the HSO

The HSO provides platforms with the option of entering into a formal agreement with the City to facilitate enforcement. Airbnb is the only platform that has entered into such an agreement. This agreement involves the use of an Application Programming Interface (“API”) to connect the DCP’s computer system and Airbnb’s computer system, facilitated by contractor Host Compliance. Host Compliance boasts being “the leading provider of short-term rental compliance monitoring and enforcement solutions to local governments” and works with DCP to identify illegal STRs and monitor and enforce registration. Each month, Host Compliance reports the total number of STR listings it has found, along with the number of associated addresses. The API, launched in September 2020, assists in identifying violations of the HSO for removal of illegal STR listings only as to Airbnb because Airbnb is the only platform that has a formal agreement with the City.

One other platform, One Fine Stay, claims compliance with the HSO through regular submission of listing information to DCP.¹⁶

The DCP also operates a complaint hotline, which it encourages residents of the City to call to file complaints about illegal STR activity. It is unclear, however, how these complaints are addressed or if any enforcement action is taken at all in response.

High Levels of Non-Compliant STRs in Los Angeles

Airbnb is only one of dozens of STR hosting platforms operating in Los Angeles. As of late November 2021, at least 32 platforms advertise STRs in Los Angeles.¹⁷ By far the largest is Airbnb. Six other platforms — Booking.com, Expedia, Flipkey, HolidayLettings, Tripping.com, and VRBO — each advertise hundreds or even thousands of listings in Los Angeles. Other sites — like Houfy, iTrip, OwnerDirect, RedAwning, and Vacation Home Rents — appear to each have dozens of Los Angeles listings. Several platforms cater to niche markets: Black travelers (Noirbnb), travelers with children (KidandCoe), gay travelers (Misterbandb), outdoor stays (HipCamp), and marijuana enthusiasts (Bud and Breakfast, Hibnb).¹⁸ Platforms are increasingly competing at the high end of the market, including at BestNestLiving, GoElite, Dream Stays, OneFineStay, and Plumguide.

The data available from platforms other than Airbnb is nowhere near as robust or reliable as the data available for Airbnb. Some of the conclusions we can draw about the non-Airbnb platforms, therefore, are necessarily limited.

By combining listing data from Airbnb web scrapes with HSO registration data from DCP, BNLA developed a model to determine not only the likely compliance status of STR listings in the L.A. market, but also their associated occupancy and revenue. (See full methodology in Appendix.)

Applying this methodology, we determined that for the 12-month period from November 2020 to October 2021, on average, 6,670 units were listed on Airbnb for short-term rental each month. On average, 2,098 of these listings were compliant with the HSO; 1,260 were noncompliant; and an additional 3,312 were suspect. Over the 12-month period, guests occupied 592,768 room nights and generated direct revenue of \$133 million. To determine if a given room night — and its associated revenue — is compliant with the HSO, we looked at several factors (which are further broken down in the methodology section of the Appendix):

1. Does the listing advertise an STR or an LTR?
2. Does the listing include a registration number or an exemption?
3. If the listing includes a registration number or exemption, is it valid?

We examined each Airbnb listing in each of the 12 months with these criteria, ultimately coding over 213,000 individual listings.

For purposes of this calculation, we assumed that every host is, in fact, listing her primary residence as required by the Ordinance (if the listing does not include an exemption). While there is evidence that hosts misrepresent their residences as primary residences,¹⁹ there are no reliable numbers for how frequently hosts make such misrepresentations. The numbers presented here for compliant STR listings, therefore, have some margin of overinclusion.*

Los Angeles Airbnb STR and Purported STR Activity, Nov. 1, 2020 – Oct. 31, 2021

(Sorted by Compliance and Non-Compliance Categories)

Category	Avg. Month Count		Nights Occupied		Revenue	
STR – Valid reg.	1,943	29.13%	291,021	49.1%	\$73,369,215.50	55.05%
STR – Duplicate reg.	415	6.22%	44,377	7.49%	\$11,471,543.50	8.61%
STR – Duplicate reg. (maybe)	328	4.92%	29,659	5.00%	\$4,460,857.50	3.35%
STR – No reg.	298	4.47%	25,350	4.28%	\$4,793,649.00	3.60%
STR – Expired reg.	62	0.93%	9,421	1.59%	\$2,350,038.00	1.76%
STR – Fake reg.	148	2.22%	11,222	1.89%	\$2,673,453.00	2.01%
STR – Exempt (hot-mot)	310	4.65%	23,313	3.93%	\$3,661,694.50	2.75%
STR – Exempt (B&B)	127	1.90%	9,354	1.58%	\$1,330,847.50	1.00%
STR – Exempt (TORS)	262	3.93%	18,231	3.08%	\$3,346,083.00	2.51%
LTR – Possible STR Intent	2,777	41.63%	130,820	22.07%	\$25,824,306.34	19.38%
Grand Total	6,670	100%	592,728	100%	\$133,281,687.84	100%

*In future research we hope to combine the Airbnb and DCP data with property ownership information from the County Assessor's office to identify false claims of primary residence.

Los Angeles Airbnb STR Activity, Nov. 1, 2020 – Oct. 31, 2021

(Sorted by Compliance Status of Listings)

Category	Avg. Month Count		Nights Occupied		Revenue	
Compliant	2,098	31.46%	302,678	51.06%	\$75,200,062.75	56.42%
Non-Compliant	1,260	18.88%	107,422	18.12%	\$22,060,689.50	16.55%
Suspect	3,312	49.66%	182,668	30.82%	\$36,020,935.59	27.03%
Grand Total	6,670	100%	592,728	100%	\$133,281,687.84	100%

In addition, the Airbnb data for Los Angeles bears out the trend of professionalization and consolidation at the top in the STR market.²⁰ The market has become increasingly top-heavy, marked by what a recent article in *Tourism Management Perspectives* called “corporate hosts,” or hosts who manage a listing on behalf of someone else.²¹ In October 2021, the top 20 hosts accounted for over eight percent of L.A.’s STR listings, up from three percent in late 2019. (For comparison, the top 20 hosts represent less than one percent of all (2,466) STR hosts.)

BNLA’s assessment of the continuing levels of noncompliant STRs and suspect STRs and LTRs demonstrate the need for strong enforcement measures to deter hosts, landlords, and speculators from exploiting L.A.’s limited housing stock for their own gain. That the top 20 hosts account for over eight percent of L.A.’s STR listings indicates that the “corporate hosts” operating and managing STRs recognize this can be a lucrative business, and they will continue to find clients in property owners interested in flipping their properties into STRs to bring in much more money than LTRs. Furthermore, this is a market that will almost certainly continue to grow and expand in new ways, and with that expansion will come an increase in noncompliance.

Common HSO Violations

Based on its assessment and work over the last year, BNLA has identified the following as the most common ways that hosts violate the HSO and avoid compliance:

Hosts Claim Bogus Exemptions

The HSO provides an exemption for which 572 hotels and motels, 19 TORS, and 3 B&Bs in the City qualify as of December 2021.²² Until very recently, however, Airbnb listed thousands of STRs purportedly exempt from the HSO. Indeed, at one point, a full one-third of all STRs listed on Airbnb claimed to be exempt.²³ Where hosts claim that they are exempt, Airbnb does not require any documentation from the host to verify the exemption is valid. The City shares the addresses of all 594 legitimate exemptions; yet Airbnb makes no effort to confirm the validity of host's claimed exemption.

The City is well aware of this problem, as DCP reported in September that: "there has been a continuing problem with listings that claim to be exempt even though they are not recognized by the City as a hotel, motel, bed and breakfast, or TORS."²⁴ (See also the February 2021 BNLA report on how Airbnb's web interface steers hosts to claim exemptions.) Since December of 2020, DCP regularly flagged hundreds of improper exemptions, only to see them reappear days later. For example, a unit first claiming to be a hotel would next claim to be a B&B. The result has been that hundreds of hosts have been able to list and rent units that not only are not exempt but are, in fact, "categorically ineligible" for home-sharing, including rent-controlled units subject to the Rent Stabilization Ordinance, Los Angeles Municipal Code, section 151.00 et seq.

The abuse of exemption status is one of many actions by hosts that suggest there are already too many ways to circumvent the HSO. Future amendments to the HSO only stand to create more opportunities for abuse by unscrupulous hosts. For this reason, BNLA believes that DCP's focus should be on enforcing the HSO as it exists, and not amending its language.

No valid registration numbers

Any non-exempt STR must display a HSO registration number; this was intended to ensure automatic compliance. Yet BNLA has found thousands of listings across many platforms that do not display a valid registration number. While there has been improvement over time, there were still over 500 STRs without any registration number in each of the past three months.²⁵

The presence of a registration number in a listing does not make the listing compliant. Every month, Airbnb advertises hundreds of listings with expired or a duplicate registration numbers. In many cases, the registration number is entirely fabricated and was never issued by DCP. Of STR listings with posted registration numbers, approximately 20 percent are fake, duplicate, or expired.

Hosts Misrepresent Property as Their Primary Residence

The HSO permits only home-sharing of a host's "primary residence." To get around this requirement, hosts fraudulently claim that a rental unit is their primary residence when they register the unit. This problem is widespread and well known to DCP. In its September 8, 2021, one-year report to the City Council, DCP staff points to the challenge that the primary residence requirement "is largely a self-certifying process." As long as a host is willing to "submit[] all the required documents and sign[] a declaration," DCP staff will issue the registration.²⁶ There is no independent investigation, even though DCP reports "often" receiving complaints and tips from neighbors about primary residence violations.²⁷ This also points to a larger problem with the automation of the registration process and indicates that hosts can easily evade the system by falsifying information about their primary residence.

According to DCP, the primary residence requirement is a particular challenge for Accessory Dwelling Units ("ADU's):²⁸

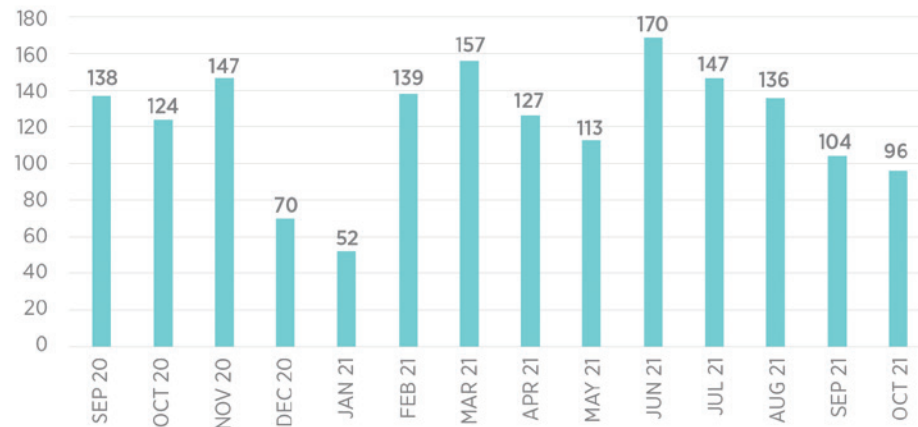
Unfortunately, Home-Sharing staff have witnessed how easy it is for a property owner, who actually lives in the main house, to fraudulently claim that a post-2017 ADU is their primary residence or to engage a friend or relative to apply for a registration, fraudulently as a tenant.

The use of ADUs built in 2017, or later, as short-term rentals is an unfortunate example of the City's efforts to increase housing density in neighborhoods that traditionally only had single-family homes by providing more options and expanding the rental market. DCP data indicates that ADUs compose less than one percent of L.A.'s housing stock, but they compose 15 percent of STR registrations, which DCP suggests is "perhaps an indicator that at least some ADUs are inappropriately being used as vacation rentals instead of providing primary housing."

STRs Offered through LTR Listings

Every month, there are dozens of purported Long-Term Rentals (“LTRs”) that each receive two or more reviews from different guests within a 30-day period. An LTR would receive, at most, one review a month because a guest must stay at least 30 days for the unit to be an LTR. Therefore, we know that some hosts of LTRs are employing some mechanism to get around this classification and rent to guests for shorter periods of time.


AIRBNB LTR LISTINGS WITH 2+ REVIEWS
IN A 30-DAY TIME PERIOD





In a September 2021 report, DCP reported some hosts appear to be advertising LTRs but that these hosts circumvent the HSO and operate disguised STRs. Unscrupulous hosts may do this by briefly toggling minimum night settings (for the few minutes required to book a reservation), or by making “off-platform” reservations directly with a guest.


The advent of “off-platform” reservations is only the latest in a long line of tricks that hosts use to game the system, and it is one of the best means by which hosts can circumvent the rules of the HSO and go undetected. Below is an example correspondence between a BNLA researcher and a host who purportedly only rents for 30 days.


Julien
[Hide Details](#)
Details


 **Ava** 3:38 PM
Hello. I am interested. Is this available for two weeks?


 **Julien** 3:41 PM
Hello, what dates would you like to come in?
If it is for 2 weeks?

 **Ava** 3:47 PM
April 25 - May 8

 **Julien** 3:53 PM
For the 2 bedroom, it is not available until April 30th. But, we have a 1 bedroom available from April 25
We can also provide 2 1-bedroom apartments if that is what you need

 **Ava** 3:55PM
My dates are flexible, I can do April 30
I prefer the two bedroom


 **Julien** 3:57 PM
Okay that should work
If you would like for two weeks, please reach out to me at thReE 1 zErO 8 ate O 5 eight 7 onE



Ready to book?
Julien lets guests book instantly.

Book now

Trip Details
Fantastic 2 Bedroom 2 Bathroom Apartment in WoHo
Entire Apartment - Los Angeles, CA, US

Hosted by Julien 
5 Reviews

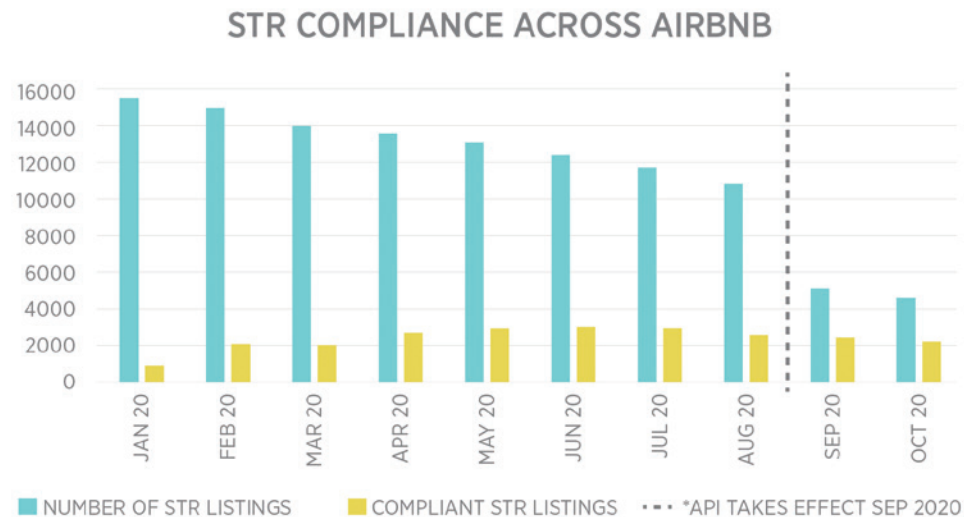
Check-in	April 22, 2021
Checkout	May 22, 2021

Gaps in HSO Enforcement

In 2016, the Los Angeles Times urged local policymakers to learn from other cities' lessons with STR regulation, writing that "good laws are futile without simple registration and strong enforcement."²⁹ While the City has made some headway in HSO enforcement, particularly with respect to Airbnb listings, gaps exist as a result of limited data sharing and data utilization.

Limited Data Sharing and Data Utilization

During the 14 months between when the HSO was supposed to take effect (July 2019) and when the Application Programming Interface ("API") took effect (September 2020), noncompliant STRs generated approximately \$222 million in revenue.³⁰ The API, a system created by the City through contractor Host Compliance, served to provide DCP with a mechanism to monitor short-term rental platforms and identify illegal listings. The introduction of API yielded immediate results and led to a drop in total listings on Airbnb by more than half. The removal of listings without registration resulted in the percentage of compliant listings more than doubling.



However, the limitations of the API are clear as the percentage of compliant Airbnb listings remained at only approximately 48% as of October 2020. Gaps in compliance include violations of the HSO that the API in its current manner of operation cannot identify, such as registered listings that are not primary residences and improperly registered post-2017 ADUs. Furthermore, the API results are non-representative of the industry since only Airbnb participates in this system, leaving 31 other platforms and thousands of units unaccounted for. The below graph depicts STR compliance across Airbnb, which almost certainly has a higher compliance rate than other platforms due to the agreement with the City, but still only remained at approximately 48% as of October 2020.



BNLA lends a hand

Better Neighbors L.A. conducts literature drops, canvasses neighborhoods, and uses press events to draw attention to problematic STR listings. In December 2020, BNLA worked with Lilly Taylor, the neighbor of an Airbnb party house on Redesdale Avenue in the Silver Lake area. Ms. Taylor said at the time, “My neighbors and I have reported this party house to Airbnb, the police, and the City of L.A., including the Planning Department. We have been reporting nuisance and violations of the Home Sharing Ordinance since at least October. But we have not received any support or help to stop this illegal party house. No one has returned my calls or done anything about this on-going situation.” In December 2020, BNLA and Ms. Taylor succeeded in getting the house shut down.

In June 2021, BNLA helped shut down an illegal hostel operating in a rent stabilized building on Orange Drive, after a door-to-door campaign encouraging residents to demand action from Councilmember Mark Ridley-Thomas. On the victory, neighbor Paula Yerman said, “I have lived in this neighborhood since the mid-90s and it has always had been a close-knit and active community. However, for the last 10 years, our quiet corner of the Miracle Mile has been plagued by an illegal vacation rental that increased crime, litter, and disturbances. For 10 years we tried to get the rental shut down and finally after working with Better Neighbors LA, we succeeded!”

120-Day Cap Not Enforced

The 120-day limit was a foundational part of the HSO intended to prevent the large-scale conversion of housing into STRs by prohibiting year-round listings. Based on data from Inside Airbnb for the month of September 2021, a BNLA analysis identified 442 listings that appeared to have violated the 120-day cap in the previous 12 months.³¹ An additional 33 listings were found right on the cusp, at 120 days.

Lack of platform participation, however, effectively renders meaningless the HSO’s 120-day limit on STRs. The fact that DCP does not require platforms to submit data on the number of nightly rentals per host means that the 120-day cap cannot be enforced.

In DCP’s September 2021 report to the City Council, DCP’s Director Vincent Bertoni stated, “Because few platforms submit booking reports to the City, City Planning is... unable to definitively determine the aggregate number of nights for a host. For this reason, citations are not currently issued for this violation.”³² Not only does this abrogation of responsibility, failing to obtain the necessary data or enforce the 120-day cap, run the risk of harming neighborhoods with intensive STR use, it is unfair to the hundreds of STR hosts who have played by the rules and followed the process to get the Extended Home-Sharing Permit (which authorizes hosts to go beyond the 120-day cap).

Unaddressed Complaints

The Administrative Guidelines, issued by the City to facilitate implementation of the HSO, state that “members of the public may call the Los Angeles Home-Sharing Hotline... to file any complaints about short-term rental activity.”³³ A 2019 DCP document addressing frequently asked questions about the HSO explained that “after we receive a complaint, staff will be able to provide real-time outreach to hosts to help resolve issues.” According to DCP data, the hotline has received 4,187 calls as of November 2021.³⁴

It is not clear if any action has been taken by the City in response to any of the complaints made to the hotline as no information has been publicly provided. In a May 2021 letter, DCP staff reported “the [HSO] program is not driven [by] [sic] complaints from the public.”³⁵ Given the size of the STR market in Los Angeles and the number of potential illegal operators in neighborhoods across the City, complaints should drive enforcement. Disgruntled neighbors are on the frontline of identifying illegal STRs, especially commercial operators that have a larger footprint and may have converted several units or houses into STRs. The lack of follow-up, analysis, and targeting by DCP of the thousands of complaints they receive is not just a failure of enforcement, but a failure of public servants to respond to legitimate complaints of the public.

Underutilization of Fines

The HSO provides ample enforcement tools, including giving the authority to city departments LADBS, LAHD, and the City Attorney's office to levy fines through the City's Administrative Citation Enforcement (ACE) Program. Fines against individual hosts range from \$500 per day to \$2,000 per day for noncompliant listings. Additionally, hosts may have their registration status suspended or revoked by DCP.

From the date that the HSO took effect, July of 2019, through early November 2021, DCP reports taking the following enforcement activity:³⁶

- \$500 fines have been issued to 922 individual hosts. All fines were for advertising an STR without a valid registration number.
- One host has been issued a second citation.
- One host's registration number was revoked.

According to DCP data, they began sending warning letters in early November 2019, but the first citations were not issued until several months later, in late February 2020. Data provided to BNLA by the City under the California Public Records Act uncovered that, in many instances, multiple warning letters have been sent to the same hosts, but no citations issued. Given that monetary citations are a stronger deterrent than warnings, the issuance of multiple warning letters draws out the process and makes enforcement less efficient and wastes precious resources.

Hosts who are cited may challenge the citation and request an administrative hearing; scores of hosts have done so. DCP reports that administrative hearings related to the HSO did not begin until the second week of August 2021. In July 2021, a BNLA analysis found that 445 of the then-770 citations remained open. Since that time, DCP has not publicly provided updated information on the status of citations.

DCP has acknowledged that for hosts "who may regard short-term rentals as a lucrative business model, a fine of \$500 may be considered a cost of doing business, and a heftier fine is needed to garner their attention."³⁷ Nonetheless, although the HSO allows fines of up to \$2,000 for some violations, DCP has only ever issued the lowest possible host fine of \$500. More significantly, the HSO allows daily fines, but DCP has declined to use this powerful tool, calling it "too time consuming" for staff.³⁸ Under current DCP practice, a commercial host advertising a noncompliant listing for six months — and illegally renting it a dozen times — would get a single \$500 fine. Under the HSO, however, that host could be fined \$91,000 (\$500 * 180 days), and the platform could be fined \$12,000 (\$1,000 * 12).

Failing to Focus on Platform Accountability

For the STR market, which is largely decentralized, enforcement is most effective when based on "platform accountability" in which platforms have both the responsibility and the liability for compliance. The problem cannot be remedied by playing whack-a-mole with noncompliant hosts. Platform accountability is more efficient and effective given that platforms have access to the host data and the power to remove hosts and their listings.



DCP leaves millions in enforcement money on the table

BNLA analyzed STR activity for the month of April 2021 to estimate the enforcement revenue potentially available to the City. Using a conservative approach, BNLA identified 1,246 noncompliant STR listings on Airbnb in April 2021.³⁹ Assuming these noncompliant listings were advertised for the full month, DCP might have assessed \$18,690,000 in fines against noncompliant hosts.⁴⁰ If each noncompliant listing was booked only one time during the month, DCP might have assessed \$1,246,000 in fines against Airbnb. DCP data indicates that for every one noncompliant listing on Airbnb, there are two noncompliant listings on other platforms.⁴¹ This suggests that for the month of April 2021 alone, DCP could have issued fines of approximately \$59.8 million for noncompliant STRs.⁴²

If a host registers for the HSO but is ineligible, DCP will deny the application and cancel the pending registration number. Many of these canceled registration numbers still wind up on Airbnb STR listings. The October 2021 Airbnb data include at least 131 live STR listings with registration numbers previously denied by DCP.⁴³

Host Compliance regularly flags noncompliant listings for platforms. Sometimes platforms remove the offending listing; sometimes they do not. In early September 2021, Host Compliance compiled a list of 2,232 noncompliant STR listings, including 734 on Airbnb. Two months later, in early November, 169 of those listings — nearly a quarter — remained live STRs on Airbnb.

DCP also describes a process whereby hosts delete and reincarnate their listings:

In some cases, a host will knowingly, illegally list their unit for a few days, then remove the listing only to repost it a few days later, and repeat the process, possibly in an attempt to evade the enforcement system. In such cases, by the time staff reviews the listing for a citation, the listing is often no longer up.

This indicates that, even in instances where these illegal units are identified, action is nowhere near swift enough to be effective, and hosts can continue to delete and repost listings as needed.

Across all platforms, Host Compliance data shows an increase in noncompliant listings, from 1,950 listings in May 2021, to 2,566 such listings in November 2021. Yet despite the increase, DCP has failed to hold platforms accountable for noncompliant listings. Not a single platform has been cited for not removing non-compliant listings, despite receiving a notice from Host Compliance.

Since home-sharing regulation was first considered by the City of Los Angeles, platform accountability — the ability to fine platforms and not just hosts — has been recognized as the single most crucial tool in regulating STRs. In fact, in a 2016 report, DCP concluded that focusing enforcement on hosts would create “several barriers to enforcement.”⁴⁴ The HSO puts responsibility on the platforms, including by requiring them to “verify compliance with the registration requirements by actively preventing or canceling any nonpermitted listings.”⁴⁵ In 2017, a DCP report provided “best practices for enforcement:”

“[T]he proposed ordinance follows the lead of cities like Santa Monica and San Francisco in requiring that hosting platforms remove the listings or face penalties. Penalties have been assessed by cities against both hosts and platforms. This framework appears fairly effective according to staff from both cities, which have both seen significant declines in commercial STR listings. However, the system is both labor- and time-intensive for city staff to enforce.”⁴⁶

Despite expressly acknowledging that platform accountability is the most effective enforcement strategy, the City has not followed its own recommendations. In a recent report DCP now claims that “[a]t the present time it is more direct and efficient to enforce against hosts rather than hosting platforms.”⁴⁷ No further explanation has been given, and no attempt has been made to square this striking statement with past program development or past DCP statements, all of which concluded the exact opposite — that absent platform accountability, it would be impossible to achieve the goals of the HSO.





Recommendations

Increase Data Collection and Transparency

Access to complete data on the short-term rental market is critical to effective enforcement. We recommend the following to implement more effective and transparent tracking mechanisms:

- Close gaps in data collection from platforms who have not entered into a formal agreement with the City and are not using the Application Programming Interface (“API”). There are 31 platforms at the time of this report that do not report data to the DCP through the API, creating a huge data and enforcement gap that potentially allows thousands of STR hosts to operate illegally and undetected.
- Work with contractor Host Compliance to increase the effectiveness of their data collection particularly for those platforms not yet using the API. DCP should then act on Host Compliance data given it is DCP’s only access to data on non-API platform listings.
- DCP should provide a means for residents of the City to verify if short-term rentals neighboring them are legal or not. DCP provides a daily list to Airbnb of addresses and registration numbers that are permitted to operate as short-term rentals, and this information could be made available on the City’s publicly available online database, ZIMAS, as well. Further, LAHD’s Code Enforcement Division Property Activity Reports should be regularly updated to include violations of the HSO.

Streamline and Coordinate Enforcement Across Departments

Unnecessary delays and excess bureaucracy dilute the impact of enforcement, especially when hosts know they can drag out the process and still operate illegal short-term rentals during that time. We recommend the following:

- Enhancing enforcement also requires greater speed in moving through the ACE administrative hearing process. DCP should cease to issue mere warning letters and instead issue citations on the first offense with increased fines for every day of non-compliance. During the appeal process, DCP should continue to levy fines to deter hosts from using the appeals process to operate illegally during that time. The DCP must coordinate with any other City department which may supplement or support DCP’s enforcement of the HSO.
- DCP should be referring STR host violators identified by Host Compliance and through API to LADBS for immediate and timely citations and fines to curb present violators of the HSO and deter future ones.
- Enforcement should be multi-layered with every department playing a role. Both LADBS and the City Attorney’s office are authorized to issue citations against those in violation of the Home Sharing Ordinance. Additionally, the City Attorney’s office is authorized to bring charges against those in violation of the Home Sharing Ordinance, both individuals and platforms. Finally, LAHD could assist in enforcement by keeping ZIMAS up to date with data about registered and permitted short-term rentals in the City.

Target and Prioritize Enforcement for the Greatest Impact

Given the size of the short-term rental market and the finite resources of the City, DCP must prioritize certain violations for enforcement and use available tools to target enforcement against the most egregious violators and where enforcement actions will most likely be successful. We recommend the following:

- DCP should institute a formal complaint process for neighbors and community organizations to log formal complaints, which would trigger either a letter of concern or an investigation into the allegation. The first step would be to look for multiple complaints about the same property or multiple complaints in neighborhoods or districts. That would help with finding pockets of non-compliance regionally. Additionally, organizing complaints by host would help to identify hosts operating multiple STR listings in violation of the HSO. The complaint line would yield a wealth of data and information from neighbors who see violations first-hand.
- Where DCP is not addressing complaints about illegal short-term rentals in neighborhoods, Councilmembers have a duty to their constituents to follow up with DCP to ensure that these complaints are addressed.
- The Ordinance prohibits the use of rent stabilized properties as short-term rentals to protect the supply of affordable housing for residents. The DCP should prioritize ensuring that RSO properties are not listed online by conducting periodic data scrapes and by maintaining an up-to-date list of RSO and other categorically prohibited properties. Any hotline complaints should be run through that database, and complaints that include a prohibited property should take priority for an investigation so that necessary enforcement actions can take place.
- Engage platforms for priority enforcement by giving them lists of prohibited properties so that their systems can block rent-stabilized housing from being listed as short-term rentals. Platforms that refuse to comply or ignore such lists should be cited. In a city that has long had an affordable housing crisis, one would expect City agencies and departments to be using the fullest extent of the law to ensure that what's left of the available affordable housing is not being exploited for commercial gain by landlords and developers that take more interest in turning a profit than keeping people housed.

Use All Available Enforcement Tools to Deter Serial Violators

The financial incentives for engaging in illegal STR activity are high, which means that enforcement actions must be aggressive enough to create a real deterrent to violators. A credible threat of enforcement ensures that DCP resources are used effectively since it will have a chilling effect on violations, increasing compliance through fear of the consequences. We recommend the following:

- Fines must be high enough to create a real deterrent for illegal activity. Under the HSO, hosts can be fined \$500 for each day of violation, though they are often only fined \$500 once for months or years of lawbreaking. Hosts should be fined to the full extent allowed by the HSO to prevent future violations. If fines accrue above a certain amount, DCP should take more severe action against scofflaws, including blocking them from any other licenses from the City. In addition, hosts that list prohibited properties, such as rent-stabilized units, should face citations and a cease-and-desist letter from the City to effectively shut down their operation, not just allow them to pay a fine and resume operations.

Enforce all parts of the HSO

DCP's focus in enforcement has primarily been in the realm of STR registration, despite the Ordinance listing countless prohibitions that hosts violate every day. Though we also have evidence that DCP enforces the primary residence requirement outlined in the HSO, this enforcement has been neither substantial nor transparent-- that is there is little way for us to know the basis upon which DCP determines whether a property is a host's primary residence. Ultimately, many opportunities for enforcement exist to combat the common HSO violations, including the operation of multiple short-term rentals, operation of a short-term rental out of a house that is not the host's primary address, using a post-2017 ADU as a short-term rental, and hosting multiple parties of guests simultaneously. To the frustration of many residents, DCP has made clear its lack of interest in enforcing against HSO violations not pertaining to registration status.

- Engage the City Attorney to take legal action against egregious violators. An appropriate means of enforcement would be to seek injunctive relief for violations of the HSO under the Unfair Competition Law ("UCL"), California Business and Professions Code, section 17200 et seq., which the City Attorney's Office has express authority to do. The office could also bring a civil action to abate a public nuisance against HSO violators, including host platforms, who engage in illegal conduct as it has done for other housing-related violations of the Los Angeles Municipal Code.

Increase Accountability of Regulators and Platforms

Platforms should not allow hosts to list STRs without registration numbers, and DCP should fine them if they do and if they list properties that are prohibited. As of now, platforms have no incentive to abide by or enforce the HSO. If anything, they stand to lose more by acting in compliance and taking down listings not in compliance. Issuing citations to the platforms increases the likelihood that they will begin to better enforce the Ordinance through internal controls. Targeting individual offending hosts will never be enough given the widespread nature of illegal STR activity. Additionally, approaching enforcement from an individualistic perspective will only put further strain on available resources and funds that DCP has to enforce the HSO.

- Enforcement requires not just funding and procedures, it requires our City's enforcing departments to hold global corporations, along with smaller commercial enterprises, accountable for violations. It requires the will to impose fines large enough to deter scofflaws.
- Elected officials have a duty to protect their constituents, and they must hold DCP and other departments accountable and give them the political backing they need when it comes to enforcing the Home-Sharing Ordinance against both individuals and platforms.
- The Planning and Land Use Management (PLUM) Committee of the Los Angeles City Council has the ability to enact legislation to ensure that the DCP is taking all appropriate measures to enforce the Home Sharing Ordinance. For example, PLUM recently passed legislation directing DCP to create a report over the next three months with research regarding other effective means of enforcement against illegal short-term rentals both across the U.S. and globally. The PLUM Committee should continue to pass legislation ensuring the HSO is properly enforced.

End Notes

- 1 City of Los Angeles Home Sharing Ordinance; Ordinance No. 185931
- 2 City of Los Angeles Home Sharing Ordinance; Ordinance No. 185931
- 3 City of Los Angeles Home Sharing Ordinance; Ordinance No. 185931
- 4 David Wachsmuth et al., "The High Cost of Short-Term Rentals in New York City," McGill University School of Urban Planning (January 30, 2018), at p. 2, at: <https://www.mcgill.ca/newsroom/channels/news/high-cost-short-term-rentals-new-york-city-284310>.
- 5 New York City Comptroller Scott M. Stringer, "Comptroller Stringer Report: NYC Renters Paid an Additional \$616 Million in 2016 Due to Airbnb" (May 2, 2018), available at: <https://comptroller.nyc.gov/newsroom/comptroller-stringer-report-nyc-renters-paid-an-additional616-million-in-2016-due-to-airbnb/>.
- 6 Josh Bivens, "The economic costs and benefits of Airbnb," ECONOMIC POLICY INSTITUTE (Jan. 30, 2019), available at: <https://www.epi.org/publication/the-economic-costs-and-benefits-of-airbnb-noreason-for-local-policymakers-to-let-airbnb-bypass-tax-or-regulatory-obligation>
- 7 Barron, Kyle and Kung, Edward and Proserpio, Davide, The Effect of Home-Sharing on House Prices and Rents: Evidence from Airbnb (March 4, 2020). Available at SSRN: <https://ssrn.com/abstract=3006832> or <http://dx.doi.org/10.2139/ssrn.3006832>
- 8 Georgios Zervas, Davide Proserpio, and John W. Byers, "The Rise of the Sharing Economy: Estimating the Impact of Airbnb on the Hotel Industry," *Journal of Marketing Research*, October 2017.
- 9 Ana-Maria Sucio, "The impact of Airbnb on local labour markets in the hotel industry in Germany," Joint European Master Programme in Comparative Local Development, November 2016.
- 10 CA EDD, Industry Employment & Labor Force by Month, data as of November 19, 2021 for NAICS 72100: 40,500 down from 52,000 in early 2020.
- 11 Margot Roosevelt, "State's job growth in August is triple U.S. rate," *Los Angeles Times*, September 18, 2021.
- 12 City of Los Angeles Home Sharing Ordinance; Ordinance No. 185931
- 13 City of Los Angeles Home Sharing Ordinance; Ordinance No. 185931
- 14 City of Los Angeles Home Sharing Ordinance; Ordinance No. 185931
- 15 City of Los Angeles Home Sharing Ordinance; Ordinance No. 185931
- 16 Over the course of 2020, One Fine Stay submitted weekly spreadsheets to DCP including all listings in the city of L.A., registration or exemption information on each, information on nights booked, and partial address information. There were typically a few dozen listings per week. The platform has presumably continued regular submission to DCP, though BNLA has opted not to burden DCP with these records requests on an ongoing basis.
- 17 Accessed 42 platform websites involved in STR and/or LTR activity, November 28, 2021. Excluded from final tally 16 platforms that have either ceased operations, include no Los Angeles listings, or appear to require a 31-day minimum stay. Fully excluded from this analysis are platforms dealing exclusively in LTRs. Such platforms post monthly (rather than nightly) prices and — on a first approximation — appear to be HSO-compliant. Platforms include Furnished Finder, Key Housing, Remotely, Sabbatical Homes, Stay Tony, Synergy Global Housing, Transplanthousing, Travel Nurse Housing, and Tripalink.
- 18 When last checked, Noirbnb did not have any active L.A. listings.
- 19 Memo from Vince Bertoni to City Council, September 8, 2021, cf. file 20-0995; p. 14
- 20 See, e.g., Agustín Cocola-Gant, et al., "Corporate hosts: The rise of professional management in the short-term rental industry," *Tourism Management Perspectives*, 2021; Samantha Shankman, "The Startup Businesses Built Around the Airbnb Ecosystem," *Skift*, November 18, 2014; RBC Capital Markets research note on Airbnb, December 16, 2021.
- 21 Agustín Cocola-Gant, et al., "Corporate hosts: The rise of professional management in the short-term rental industry," *Tourism Management Perspectives*, 2021.
- 22 BNLA has been submitting regular requests under the California Public Records Act since late 2019.
- 23 Web scrape provided by Inside Airbnb.
- 24 Memo from Vince Bertoni to City Council, September 8, 2021, cf. file 20-0995.
- 25 It is worth noting that some subset of listings that appear to be missing a registration number are likely outside the city of L.A. See appendix for full methodology.
- 26 Memo from Vince Bertoni to City Council, September 8, 2021, cf. file 20-0995.
- 27 Memo from Vince Bertoni to City Council, September 8, 2021, cf. file 20-0995; p. 14
- 28 Memo from Vince Bertoni to City Council, September 8, 2021, cf. file 20-0995.
- 29 Editorial Board, "How to regulate Airbnb," *Los Angeles Times*, June 22, 2016.
- 30 During the 12 months of analysis, the 1,475 average monthly noncompliant STRs generated \$22,060,689.50 in revenue, or \$1,246.37 per month. From September 2019 through August 2020, there were an average monthly 12,710 noncompliant STRs. Assuming the same revenue per noncompliant listing, (12,710 * \$1,246.37 * 14).
- 31 Using number of reviews left in the past 12 months; see appendix for complete methodology.
- 32 Memo from Vince Bertoni to City Council, September 8, 2021, cf. file 20-0995.
- 33 HSO Administrative Guidelines, issued June, 2019.
- 34 From program start through early November 2021.
- 35 Correspondence from Beatrice Pacheco dated May 4, 2021.
- 36 BNLA has been submitting regular requests under the California Public Records Act since late 2019.
- 37 Memo from Vince Bertoni to City Council, September 8, 2021, cf. file 20-0995.
- 38 Memo from Vince Bertoni to City Council, September 8, 2021, cf. file 20-0995.
- 39 Noncompliance stems from: no registration number (4), fake or expired registration number (222), duplicate registration number (419), or improper exemptions (601). The true number of noncompliant listings is likely higher after examining additional factors (such as RSO status, primary residence, violating the 120-day cap, and engaging in STR activity despite advertising a LTR).
- 40 Assumes minimum \$500 fine applied to 1,246 hosts for 30 days.
- 41 On May 21, 2021, Host Compliance identified 1,950 noncompliant listings across all platforms; 640 of these were on Airbnb.
- 42 \$19.936M in fines on Airbnb and its hosts suggests \$39.872M in fines across other hosts and platforms.
- 43 As this analysis was performed on a de-duplicated list of October 2021 Airbnb registration numbers, it provides a floor for the number of actual noncompliant listings.
- 44 Memo from Vincent Bertoni to the City Planning Commission, June 23, 2016; DIR-2016-1243-CA, p. A-15.
- 45 Memo from Vincent Bertoni to the City Planning Commission, June 23, 2016; DIR-2016-1243-CA, p. A-15.
- 46 Memo from Vincent Bertoni to L.A. City Council, October 19, 2017; (council files 14-1635-S2, 14-1635-S3); p. 7.
- 47 Memo from Vince Bertoni to City Council, September 8, 2021, cf. file 20-0995.

Appendix I: Methodology

The data that BNLA uses to conduct analysis on the state of home-sharing and HSO enforcement in Los Angeles is taken from two sources, Inside Airbnb (an activist project that makes Airbnb data available for researchers), and data the City of LA. These two sources, in tandem, inform our understanding of LA’s short-term rental market, and how the City is monitoring and regulating it in accordance with the Home-Sharing Ordinance.

Inside Airbnb

Inside Airbnb regularly “scrapes” public-facing data from the Airbnb website, cleans them, catalogues them by market, and makes them available for researchers. Because scrapes are backward-looking (see Occupancy calculation below), we refer to the scrape dated January 2, 2021 as containing December 2020’s data. (DCP contractor Host Compliance follows a similar convention.) Each individual listing on the platform is associated with a range of data points, which include the listing URL, host name and ID number, amenities, neighborhood, price, minimum night stay, and number of reviews; there are 74 distinct fields. For more information, see insideairbnb.com. BNLA has financially compensated Inside Airbnb for the collection and use of their LA Data.

City of L.A. Data

BNLA has been submitting regular requests under the California Public Records Act since late 2019. Standard requests to DCP include: data on HSO registration applications (granted and denied); data on HSO occupancy; data on enforcement activity under the HSO; and data on complaints under the HSO. DCP also provides monthly reports and other communications from its contractor Host Compliance. Additional information was provided by the Department of Finance, the Department of Building and Safety, and the City Attorney.

Listing Categories

BNLA classifies each listing based on (a) whether it is advertised as a STR or as a LTR; (b) its licensing status under the HSO; and (c) whether a valid registration number is unique or duplicated.

- The Inside Airbnb `minimum_nights` field displays the listing’s current minimum night requirement. Any listing with a value from 1–29 nights is coded as a STR; 30+ is coded LTR.¹
 - BNLA creates the category of LTR with Possible STR Intent to flag listings that are on their face compliant, but where there are indications of STR intent.
 - As LTRs are exempt from regulation, we take the presence of any value in the license field of a LTR (any registration number — real or fake — or any exemption claim) to indicate possible intent.
 - We also compare the `minimum_nights` field to the `minimum_minimum_nights` field, the latter of which captures all minimum nights for the next 365 days and presents the lowest. We code `[(minimum_nights = 30+) + (minimum_minimum_nights < 14)]` as LTR with Possible STR Intent.

¹The HSO defines STRs as “stays of 30 consecutive days or less,” which DCP interprets as 29 nights or less. BNLA disagrees with this interpretation and believes the 10,251 30-night-minimum listings that lack a registration number (as of November 2021) are not in compliance with the HSO.

- The Inside Airbnb license field displays a listing’s DCP-issued HSO registration number, or possibly a claim of exemption, along with the reason for the exemption. The field may also be left blank. BNLA compares the value in the license field to a contemporaneous list of registration numbers provided by DCP through CPRA requests. (BNLA first cleans the non-standardized license data in the Inside Airbnb scrape, e.g. HSR-19001234 is corrected to HSR19-001234.)
 - If the listing’s registration number appears in the DCP list, the listing is coded as either regular reg or EHS (for extended home share registration), as appropriate; both are ultimately classified as valid reg.
 - If the registration number does not appear in the DCP list, we look for it in a master list of all (previous) DCP licenses over time, coding hits as expired.
 - Any remaining registration numbers are coded as fake.
 - Any STR with no value in the registration field is coded as No reg.
- The license field may also display an exemption claim, along with the reason for exemption: hotel-motel, transient occupancy residential structure (TORS), or bed and breakfast (B&B).
- In the case of potential duplication — multiple Airbnb listings using the same registration number — we use Inside Airbnb’s room type field to evaluate the potential for abuse. (Note this evaluation is only applied to STRs with valid (regular or EHS) registration numbers.) The room type indicates whether the listing is for an entire property, a private room, or a shared room. The same registration number being used for two or more entire properties indicates a straightforward violation (a host may list only a primary residence) and is coded as duplicate.
 - If a given registration number is used multiple times but includes only one entire home listing (along with any number of private or shared rooms), the listings are coded as maybe duplicates and would require additional investigation. These listings may be compliant or noncompliant.
 - Note that not all duplicate listings are noncompliant.

In the case of noncompliant listings with multiple violations, the most egregious or salient aspect of the listing is highlighted. For instance, if a fake registration number is used on two entire property listings, the STRs — technically both fake and duplicate — are coded as fake.

Below is the table that breaks down the distribution of STRs on Airbnb into each category.

**Los Angeles Airbnb STR and Purported STR Activity, Nov. 1, 2020 – Oct. 31, 2021
(Sorted by Compliance and Non-Compliance Categories)**

Category	Avg Month. Count		Nights Occupied		Revenue	
STR – Valid reg.	1,943	29.13%	291,021	49.10%	\$73,369,215.50	55.05%
STR – Duplicate reg.	415	6.22%	44,377	7.49%	\$11,471,543.50	8.61%
STR – Duplicate reg. (maybe)	328	4.92%	29,659	5.00%	\$4,460,857.50	3.35%
STR – No reg.	298	4.47%	25,350	4.28%	\$4,793,649.00	3.60%
STR – Expired reg.	62	0.93%	9,421	1.59%	\$2,350,038.00	1.76%
STR – Fake reg.	148	2.22%	11,222	1.89%	\$2,673,453.00	2.01%
STR – Exempt (hot- mot)	310	4.65%	23,313	3.93%	\$3,661,694.50	2.75%
STR – Exempt (B&B)	127	1.90%	9,354	1.58%	\$1,330,847.50	1.00%
STR – Exempt (TORS)	262	3.93%	18,231	3.08%	\$3,346,083.00	2.51%
LTR – Possible STR Intent	2,777	41.63%	130,820	22.07%	\$25,824,306.34	19.38%
Grand Total	6,670	100%	592,768	100%	\$133,281,687.84	100%

HSO Compliance Categories

Compliant listings are all of those coded as valid reg and half of those coded as exempt hotels or motels. (See manual inspections below.)

Noncompliant listings include all STRs with fake, expired registration numbers, or missing registration numbers. Also included are half of the STRs with duplicate numbers. Lastly included are all exempt TORS, all exempt B&Bs, and half of the exempt hotel-motels.

Suspect listings include all LTRs with Possible STR Intent, all duplicate (maybe)s, and half of the duplicates.

Occupancy and Revenue Calculations

We define occupancy as the number of stays multiplied by the typical length of stay. As a proxy for the number of stays, we use the number of reviews left in the previous 30 days. Not all stays yield reviews, so we adjust the number of reviews by a factor of two. We assume each stay is the regional average of four days; however, we use the minimum `_nights` if its value is more than four. Regardless of the length of stay or the number of reviews, no listing can have more than 31 nights occupied in a month.

Revenue is the product of the nights occupied and the posted nightly price.

Manual Inspections of Exemptions

As described above, DCP has provided location information for exempt properties in the city. Airbnb provides semi-anonymized location information on each listing: the latitude and longitude is typically accurate within 150 meters. In March 2021, a BNLA analysis compared all 1,593 exempt listings that month with all 594 legitimate exempt properties by placing all locations on a map and subjecting them to a visual inspection. When a claimed exemption appeared to be within the margin of error for a legitimate exempt property, the listing would be subject to a secondary analysis. This secondary analysis combined additional information from the listing (e.g., description, photos) with outside information (e.g., from Google Maps) to determine if the exemption was legitimate. BNLA found that none of the claimed TORS or B&Bs were legitimate, but that approximately half of the hotel-motels were legitimate.

Limitations of the Analysis

This methodology is more likely to err by miscoding a given registration as valid rather than invalid.

- We simply assume that all registrations issued by DCP were properly issued. In reality, we believe (and DCP seems to agree) that hosts have been issued registration numbers improperly — perhaps because the property is not the host’s primary residence, or because the property is categorically ineligible.
- We further assume that a registration number displayed in a listing in fact belongs to that listing. This is not always the case: hosts have been surprised to find their (legitimate) registration number attached to an unrelated host’s listing.
- For the period in question (November 2020 through October 2021), DCP provided six registration lists (12/4/20, 12/21/20, 4/28/21, 6/16/21, 9/7/21, 11/10/21). The date of the list generation was typically within a few weeks of the date of an Inside Airbnb scrape. In the four cases where three or more weeks separated an Inside Airbnb scrape date from a registration list date, BNLA instead used two registration lists, an earlier one and a later one. (For instance, the Inside Airbnb scrape from March 3, 2021 accepts any registration number as valid if it appears on either the 12/21/20 or the 4/28/21 registration list.) This overly conservative approach risks overstating compliance.

Guardrails designed to reduce variance could be undercounting noncompliant activity.

- By definition, we do not allow any listing to have more than 31 nights booked in a month. Yet we have seen listings garner dozens of reviews in a given month. Discarding this data could disproportionately reduce noncompliant occupancy and revenue.
- To limit variance and to avoid potentially compounding problems with the largest occupancy and revenue numbers, we make an adjustment to the calculations for the highest-end listings, those with a nightly price over \$1,000. For these listings, we adjust the number of reviews by a factor of 1.5 (rather than 2), and we strictly use the minimum `_nights` as the length of stay.

Location information is imprecise.

- Airbnb’s semi-anonymization of listing locations is particularly relevant for STRs without a registration number. A manual inspection of these locations shows they are disproportionately (though not exclusively) located near the city line, suggesting this methodology may overstate the noncompliance of STRs with no registration.

Appendix II: Data Tables

November 2020

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,834	10.5%	17,348	28.6%	\$3,689,805.00	33.8%
	Duplicate reg.	418	2.4%	2,598	4.3%	\$663,075.50	6.1%
	Duplicate reg. (maybe)	330	1.9%	998	1.6%	\$119,495.00	1.1%
	No reg.	214	1.2%	850	1.4%	\$150,030.00	1.4%
	Expired reg.	68	0.4%	338	0.6%	\$97,972.00	0.9%
	Fake reg.	339	1.9%	3,187	5.3%	\$786,852.50	7.2%
	Exempt (hot-mot)	460	2.6%	3,100	5.1%	\$436,577.00	4.0%
	Exempt (B&B)	232	1.3%	1,782	2.9%	\$207,006.00	1.9%
	Exempt (TORS)	446	2.6%	2,746	4.5%	\$433,584.00	4.0%
LTR	LTR	11,171	63.9%	14,415	23.8%	\$1,990,138.00	18.2%
	Possible STR Intent	1,970	11.3%	13,237	21.8%	\$2,349,459.00	21.5%
Grand Total		17,482	100.0%	60,598	100.0%	\$10,923,994.00	100.0%

December 2020

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,832	10.3%	8,829	17.2%	\$2,872,373.00	34.2%
	Duplicate reg.	411	2.3%	7,559	14.8%	\$389,371.50	4.6%
	Duplicate reg. (maybe)	328	1.8%	767	1.5%	\$110,547.50	1.3%
	No reg.	214	1.2%	856	1.7%	\$123,707.00	1.5%
	Expired reg.	49	0.3%	200	0.4%	\$41,339.00	0.5%
	Fake reg.	408	2.3%	2,669	5.2%	\$595,092.00	7.1%
	Exempt (hot-mot)	483	2.7%	2,957	5.8%	\$375,387.50	4.5%
	Exempt (B&B)	236	1.3%	1,888	3.7%	\$213,595.00	2.5%
	Exempt (TORS)	520	2.9%	3,807	7.4%	\$599,173.00	7.1%
LTR	LTR	11,316	63.5%	15,841	30.9%	\$1,788,080.00	21.3%
	Possible STR Intent	2,029	11.4%	5,828	11.4%	\$1,284,272.34	15.3%
Grand Total		17,826	100.0%	51,199	100.0%	\$8,392,937.84	100.0%

January 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,940	11.0%	14,265	30.8%	\$3,017,215.00	38.5%
	Duplicate reg.	435	2.5%	2,231	4.8%	\$542,196.50	6.9%
	Duplicate reg. (maybe)	354	2.0%	1,116	2.4%	\$142,585.00	1.8%
	No reg.	210	1.2%	842	1.8%	\$133,040.00	1.7%
	Expired reg.	24	0.1%	212	0.5%	\$37,806.00	0.5%
	Fake reg.	278	1.6%	1,704	3.7%	\$434,355.50	5.5%
	Exempt (hot-mot)	527	3.0%	3,099	6.7%	\$421,986.00	5.4%
	Exempt (B&B)	245	1.4%	2,054	4.4%	\$270,961.50	3.5%
	Exempt (TORS)	268	1.5%	941	2.0%	\$190,360.00	2.4%
LTR	LTR	11,311	63.9%	13,082	28.3%	\$1,540,390.00	19.6%
	Possible STR Intent	2,109	11.9%	6,727	14.5%	\$1,108,994.00	14.1%
Grand Total		17,701	100.0%	46,271	100.0%	\$7,839,889.50	100.0%

February 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,881	10.5%	17,222	33.9%	\$3,802,832.50	40.6%
	Duplicate reg.	415	2.3%	2,682	5.3%	\$673,494.50	7.2%
	Duplicate reg. (maybe)	347	1.9%	1,862	3.7%	\$278,933.00	3.0%
	No reg.	208	1.2%	1,043	2.1%	\$203,873.00	2.2%
	Expired reg.	12	0.1%	87	0.2%	\$9,335.00	0.1%
	Fake reg.	176	1.0%	1,118	2.2%	\$225,687.00	2.4%
	Exempt (hot-mot)	320	1.8%	1,708	3.4%	\$235,743.00	2.5%
	Exempt (B&B)	118	0.7%	307	0.6%	\$65,515.00	0.7%
	Exempt (TORS)	244	1.4%	500	1.0%	\$114,270.00	1.2%
LTR	LTR	11,557	64.7%	12,865	25.3%	\$1,583,759.00	16.9%
	Possible STR Intent	2,573	14.4%	11,470	22.6%	\$2,184,229.00	23.3%
Grand Total		17,851	100.0%	50,863	100.0%	\$9,377,671.00	100.0%

March 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,756	10.0%	22,455	36.3%	\$5,497,474.50	45.9%
	Duplicate reg.	411	2.3%	3,528	5.7%	\$1,034,683.00	8.6%
	Duplicate reg. (maybe)	330	1.9%	2,382	3.9%	\$338,152.00	2.8%
	No reg.	214	1.2%	1,168	1.9%	\$218,755.00	1.8%
	Expired reg.	95	0.5%	1,097	1.8%	\$225,601.00	1.9%
	Fake reg.	137	0.8%	902	1.5%	\$239,836.00	2.0%
	Exempt (hot-mot)	356	2.0%	1,757	2.8%	\$252,450.00	2.1%
	Exempt (B&B)	121	0.7%	318	0.5%	\$62,854.00	0.5%
	Exempt (TORS)	278	1.6%	870	1.4%	\$165,149.00	1.4%
LTR	LTR	11,326	64.2%	15,283	24.7%	\$1,932,044.00	16.1%
	Possible STR Intent	2,619	14.8%	12,059	19.5%	\$2,002,755.00	16.7%
Grand Total		17,643	100.0%	61,818	100.0%	\$11,969,753.50	100.0%

April 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,898	11.0%	27,121	38.5%	\$6,736,134.50	46.8%
	Duplicate reg.	418	2.4%	4,023	5.7%	\$1,135,179.00	7.9%
	Duplicate reg. (maybe)	329	1.9%	3,070	4.4%	\$445,714.50	3.1%
	No reg.	209	1.2%	1,298	1.8%	\$255,834.50	1.8%
	Expired reg.	50	0.3%	641	0.9%	\$191,141.00	1.3%
	Fake reg.	16	0.1%	103	0.1%	\$26,657.00	0.2%
	Exempt (hot-mot)	306	1.8%	1,378	2.0%	\$268,426.00	1.9%
	Exempt (B&B)	108	0.6%	294	0.4%	\$46,853.00	0.3%
	Exempt (TORS)	284	1.6%	928	1.3%	\$191,746.00	1.3%
LTR	LTR	11,085	64.2%	19,654	27.9%	\$2,532,700.00	17.6%
	Possible STR Intent	2,570	14.9%	11,935	16.9%	\$2,554,524.00	17.8%
Grand Total		17,273	100.0%	70,444	100.0%	\$14,384,909.50	100.0%

May 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,953	11.1%	29,002	39.3%	\$7,340,328.00	48.0%
	Duplicate reg.	404	2.3%	4,208	5.7%	\$1,215,011.00	7.9%
	Duplicate reg. (maybe)	344	2.0%	3,702	5.0%	\$527,815.50	3.5%
	No reg.	215	1.2%	1,690	2.3%	\$331,496.00	2.2%
	Expired reg.	61	0.3%	961	1.3%	\$241,342.00	1.6%
	Fake reg.	16	0.1%	87	0.1%	\$19,345.00	0.1%
	Exempt (hot-mot)	322	1.8%	2,109	2.9%	\$346,115.00	2.3%
	Exempt (B&B)	191	1.1%	881	1.2%	\$164,410.00	1.1%
	Exempt (TORS)	396	2.3%	2,525	3.4%	\$487,145.00	3.2%
LTR	LTR	11,104	63.4%	18,259	24.7%	\$2,312,352.00	15.1%
	Possible STR Intent	2,514	14.3%	10,385	14.1%	\$2,306,679.00	15.1%
Grand Total		17,520	100.0%	73,808	100.0%	\$15,292,038.50	100.0%

June 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,998	11.3%	31,490	39.2%	\$8,436,902.50	48.2%
	Duplicate reg.	405	2.3%	4,199	5.2%	\$1,368,233.00	7.8%
	Duplicate reg. (maybe)	360	2.0%	3,512	4.4%	\$583,858.00	3.3%
	No reg.	225	1.3%	1,723	2.1%	\$467,852.50	2.7%
	Expired reg.	88	0.5%	1,009	1.3%	\$269,094.00	1.5%
	Fake reg.	230	1.3%	412	0.5%	\$129,117.00	0.7%
	Exempt (hot-mot)	713	4.0%	5,634	7.0%	\$1,042,743.00	6.0%
	Exempt (B&B)	152	0.9%	1,412	1.8%	\$233,076.00	1.3%
	Exempt (TORS)	516	2.9%	4,762	5.9%	\$905,357.00	5.2%
LTR	LTR	11,109	62.8%	18,011	22.4%	\$2,368,741.00	13.5%
	Possible STR Intent	1,885	10.7%	8,184	10.2%	\$1,689,438.00	9.7%
Grand Total		17,681	100.0%	80,347	100.0%	\$17,494,412.00	100.0%

July 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	2,304	12.9%	34,268	43.2%	\$9,615,692.50	53.4%
	Duplicate reg.	420	2.4%	4,160	5.2%	\$1,490,795.50	8.3%
	Duplicate reg. (maybe)	281	1.6%	2,631	3.3%	\$356,668.50	2.0%
	No reg.	244	1.4%	1,879	2.4%	\$428,495.00	2.4%
	Expired reg.	41	0.2%	688	0.9%	\$180,912.50	1.0%
	Fake reg.	16	0.1%	144	0.2%	\$42,475.00	0.2%
	Exempt (hot-mot)	220	1.2%	1,484	1.9%	\$270,995.00	1.5%
	Exempt (B&B)	80	0.4%	231	0.3%	\$38,131.00	0.2%
	Exempt (TORS)	129	0.7%	919	1.2%	\$212,891.00	1.2%
LTR	LTR	10,985	61.5%	19,375	24.4%	\$2,545,565.00	14.1%
	Possible STR Intent	3,152	17.6%	13,578	17.1%	\$2,833,555.00	15.7%
Grand Total		17,872	100.0%	79,355	100.0%	\$18,016,176.00	100.0%

August 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	2,030	11.3%	31,875	39.4%	\$8,292,547.50	49.8%
	Duplicate reg.	410	2.3%	3,548	4.4%	\$1,075,431.50	6.5%
	Duplicate reg. (maybe)	338	1.9%	3,871	4.8%	\$592,878.50	3.6%
	No reg.	505	2.8%	4,218	5.2%	\$714,997.00	4.3%
	Expired reg.	46	0.3%	726	0.9%	\$247,251.00	1.5%
	Fake reg.	15	0.1%	110	0.1%	\$14,784.00	0.1%
	Exempt (hot-mot)	5	0.0%	24	0.0%	\$4,584.00	0.0%
	Exempt (B&B)	13	0.1%	109	0.1%	\$19,875.00	0.1%
	Exempt (TORS)	13	0.1%	31	0.0%	\$6,975.00	0.0%
LTR	LTR	10,653	59.0%	21,793	26.9%	\$2,891,339.00	17.4%
	Possible STR Intent	4,016	22.3%	14,694	18.1%	\$2,782,870.00	16.7%
Grand Total		18,044	100.0%	80,998	100.0%	\$16,643,532.50	100.0%

September 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,939	10.7%	28,214	39.3%	\$6,872,865.00	48.6%
	Duplicate reg.	411	2.3%	2,733	3.8%	\$850,169.50	6.0%
	Duplicate reg. (maybe)	303	1.7%	2,962	4.1%	\$541,105.00	3.8%
	No reg.	580	3.2%	4,995	6.9%	\$901,569.50	6.4%
	Expired reg.	47	0.3%	628	0.9%	\$149,917.00	1.1%
	Fake reg.	135	0.7%	683	1.0%	\$145,092.00	1.0%
	Exempt (hot-mot)	6	0.0%	24	0.0%	\$1,960.00	0.0%
	Exempt (B&B)	21	0.1%	40	0.1%	\$3,848.00	0.0%
	Exempt (TORS)	26	0.1%	62	0.1%	\$15,593.00	0.1%
LTR	LTR	10,729	59.1%	19,220	26.7%	\$2,255,436.00	15.9%
	Possible STR Intent	3,962	21.8%	12,307	17.1%	\$2,409,165.00	17.0%
Grand Total		18,159	100.0%	71,867	100.0%	\$14,146,720.00	100.0%

October 2021

Category		Count		Nights Occupied		Revenue	
STR	Valid reg.	1,949	10.8%	28,936	41.6%	\$7,195,045.50	49.5%
	Duplicate reg.	417	2.3%	2,912	4.2%	\$1,033,903.00	7.1%
	Duplicate reg. (maybe)	288	1.6%	2,789	4.0%	\$423,105.00	2.9%
	No reg.	532	3.0%	4,790	6.9%	\$863,999.50	5.9%
	Expired reg.	165	0.9%	2,835	4.1%	\$658,327.50	4.5%
	Fake reg.	11	0.1%	104	0.1%	\$14,160.00	0.1%
	Exempt (hot-mot)	6	0.0%	40	0.1%	\$4,728.00	0.0%
	Exempt (B&B)	12	0.1%	39	0.1%	\$4,723.00	0.0%
	Exempt (TORS)	20	0.1%	140	0.2%	\$23,840.00	0.2%
LTR	LTR	10,639	59.2%	16,585	23.8%	\$1,991,192.00	13.7%
	Possible STR Intent	3,928	21.9%	10,416	15.0%	\$2,318,366.00	16.0%
Grand Total		17,967	100.0%	69,584	100.0%	\$14,531,389.50	100.0%



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