Communication from Public

Name:	Marian Dodge
Date Submitted:	08/05/2026 03:12 PM
Council File No:	25-0029-S1
Comments for Public Posting:	Vacation Rental policy Exempt properties in Very High Fire Hazard Severity Zones

P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org

PRESIDENT
Charley Mims
CHAIR
Marian Dodge
VICE PRESIDENTS
Mark Stratton
Jamie Hall
SECRETARY
Robin Greenberg
TREASURER
Don Andres

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Doheny-Sunset Plaza NA
Encino Property Owners
Franklin/Hollywood West Res.
Franklin Hills Residents Assn.
Friends of Walnut Canyon
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mandeville Canyon
Mountaingate
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
Oaks Neighborhood Assn.
Outpost Neighborhood Assn.
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save LA River Open Space
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Studio City Residents Assn.
Sunset Hills HOA
Sunshine Hills Residents Assn.
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
West Hollywood Heights
Whitley Heights Civic Assn.

Whitley Heights Civic Assn.

CHAIRS EMERITI
Shirley Cohen
Patricia Bell Hearst
Alan Kishbaugh
Steve Twining
CHAIRS IN MEMORIAM
Jerome C. Daniel
Brian Moore
Gordon Murley
Polly Ward

HILLSIDE FEDERATION

Los Angeles City Councilmembers
City Hall
200 North Spring Street
Los Angeles, CA 90012

via email

August 5, 2026

Re: Council File Nos. 18-1246, 25-0029-S1, and 25-1473
Exclusion of Very High Fire Hazard Severity Zones from Vacation Rental Programs and Prompt Implementation of SB 346

Honorable Councilmembers:

The Hillside Federation represents 46 homeowner and neighborhood associations throughout the hillsides of Los Angeles. Our communities understand firsthand the severe wildfire, evacuation, access, and emergency-response challenges present in Very High Fire Hazard Severity Zones.

The City is currently considering both a permanent Vacation Rental Ordinance under Council File 18-1246 and a temporary major-events vacation rental program under Council File 25-0029-S1.

Transient occupancy presents distinct and unacceptable risks in hillside fire zones; therefore properties located in Very High Fire Hazard Severity Zones must be categorically excluded from participation in any vacation rental program.

The City should not treat vacation-rental expansion in fire-prone hillside communities as a simple revenue opportunity. It is also a financial-risk decision. Any incremental transient occupancy tax collected from these properties would be dwarfed by the potential public cost of a wildfire, failed evacuation, blocked emergency access, infrastructure damage, displacement, and liability. The Palisades Fire demonstrated how quickly the economic consequences of a major fire can overwhelm any projected revenue benefit. Authorizing additional transient occupancy in VHFHSZs would expose the City and its residents to disproportionate risk for comparatively little fiscal gain.

Living safely in a high-fire-hazard neighborhood requires knowledge, preparation, and cooperation. Short-term visitors are likely to arrive with no understanding of the grave danger fire poses to our communities nor of the speed with which a small brush fire can turn into a catastrophe.

This is not an abstract concern. Hillside residents regularly report conduct associated with short-term rentals that is especially dangerous in a wildfire zone, including smoking on decks and balconies, discarding cigarette butts into vegetation, outdoor parties, excessive numbers of vehicles blocking narrow roads.

Conduct that may be treated as a nuisance elsewhere can become an ignition source or evacuation obstacle in a Very High Fire Hazard Severity Zone.

LAFD itself emphasizes that streets within these zones frequently contain narrow roads, sharp curves, hairpin turns, and critical intersections where parked vehicles can block emergency access and trap residents attempting to evacuate.

Preparedness also depends on community. Fire Department and emergency-management personnel repeatedly emphasize the importance of neighborhood-level planning and encourage hillside communities to implement Ready Your LA Neighborhood, or RYLAN.

That model depends on a stable residential community.

A neighborhood cannot be meaningfully prepared when an increasing share of its homes may be occupied by transient visitors who do not participate in preparedness planning, do not know their neighbors, and may not understand how to respond during an evacuation.

The failures and congestion experienced during the Palisades Fire demonstrated the risk our communities face as well as how quickly evacuation systems can break down under real-world conditions. The City should be looking for every possible way to make our hillsides safer, not for ways to introduce more transient occupancy into them.

Any permanent or temporary vacation rental ordinance should include a clear prohibition on participation by any property located within a Very High Fire Hazard Severity Zone, as shown on the most recently adopted or officially applicable fire-hazard maps.

This exclusion should:

1. apply to all vacation rentals in non-primary residences;
2. apply regardless of whether the program is characterized as permanent, temporary, event-related, or a pilot;
3. be determined by parcel-level verification using official data;
4. be enforced by both the City and hosting platforms before a listing may be published or booked;
5. contain no waiver, discretionary exception, grandfathering provision, or special-event exemption; and
6. remain in effect if the boundaries of the applicable fire-hazard zones are expanded.

This is exactly the wrong moment to create a new entitlement for visitor-serving commercial activity in VHFHSZs.

Fire-zone exclusions and other STR restrictions are useful only if the City can identify the actual location of each rental.

SB 346 gives local governments an important new tool by authorizing them, after adopting local implementing requirements, to obtain identifying and transactional information directly from short-term rental platforms. This information can help the City determine whether a listing is located in a prohibited zone, whether it is properly registered, and whether it is operating in violation of local law.

Council File 25-1473 directs City Planning and the Office of Finance to report on implementation of SB 346. The PLUM Committee approved that motion on March 24, 2026. It has now awaited further Council action for several months. Implementation of a new state enforcement law should not remain stalled while the City simultaneously considers expanding the universe of lawful short-term rentals.

The Hillside Federation therefore requests that the Council:

1. promptly schedule CF 25-1473 for Council consideration;
2. direct timely preparation of a robust implementing ordinance;
3. require reporting of actual property addresses and Assessor Parcel Numbers;
4. ensure that data may be used for zoning, registration, fire-zone, housing, and booking-limit enforcement, not solely for collection of transient occupancy taxes;
5. require electronic platform verification of a valid registration before a listing is published or a booking completed; and
6. provide for regular auditing, public reporting, and meaningful consequences for platform noncompliance.

The City must not wait for another wildfire or failed evacuation to recognize that vacation rentals present distinct and avoidable dangers in Very High Fire Hazard Severity Zones.

People staying briefly in hillside homes cannot be expected to understand local fire behavior, evacuation routes, red-flag restrictions, neighborhood emergency plans, or the vulnerability of narrow access roads. The City cannot simultaneously ask permanent residents to build resilient, prepared neighborhoods through RYLAN while adopting policies that make those neighborhoods more transient and less knowable.

At a minimum, all Very High Fire Hazard Severity Zones must be excluded from both the permanent Vacation Rental Ordinance and any temporary major-events vacation rental program.

At the same time, the Council should move promptly to implement SB 346 so that Los Angeles can finally obtain and use the property-level information necessary to enforce the protections it adopts.

Sincerely,



Charley Mims