

David Brent Miller Jr.
15714 Yermo St.
Whittier, CA 90603

February 10, 2026

Re: First Reading of Ordinance No. 3175—Zoning Amendment No. ZCA24-0003 (Short-Term Rental Regulations).

Whittier City Council
City of Whittier, California
13230 Penn Street
Whittier, CA 90602

Dear Whittier City Council and Staff,

I respectfully request reconsideration of the requirement that “[o]ff-street parking shall be required and shall conform to the provisions of Title 18 of this Code” and “[a]ll vehicles of short-term rental occupants shall be parked only in an approved driveway or garage on the short-term rental property,” as outlined in City of Whittier, Proposed Ordinance 3175, § 5.68.060(C)(d) (2026).

Requiring parking to be reflective of the underlying zone will have an exclusionary impact for the Uptown Whittier neighborhood, for example, where older, urban properties, built without off-street parking, make strict compliance impossible. By mandating off-street parking in neighborhoods where it cannot be built, the off-street parking requirement functionally acts as a de facto ban on short-term rentals, disproportionately affecting older neighborhoods. Even more, as outlined in the Envision Whittier General Plan, it is these same older neighborhoods that have the lowest median household incomes and the highest percentage of residents whose income is below the poverty level within the City of Whittier, making implementation disproportionately harmful for Whittier’s most vulnerable, disadvantaged communities.

I would also like to respectfully advocate for the elimination of any distance separation requirement as outlined in City of Whittier, Proposed Ordinance 3175, § 5.68.060(B)(2) (2026).

The geographic impact of a minimum distance separation requirement will be inherently unequal in the City of Whittier. For example, as opposed to suburban neighbors, in a densely populated neighborhood such as Uptown Whittier, proximity created by older housing, smaller lot sizes, and multi-unit housing may simultaneously disqualify multiple neighboring units who also rely on short-term rental supplemental income. Here, this “race to the counter,” whereby the first person to obtain a license will effectively ban their neighbor from doing the same, granting one resident a “legal monopoly” on short-term rental income based solely on application timing, will be exacerbated by the underlying density of their neighborhood. Furthermore, that it is the highest density neighborhoods that also account for the lowest median household incomes in Whittier, being “locked out” by a faster-moving neighbor may lead to financial instability or even displacement for Whittier’s vulnerable, disadvantaged communities.

Respectfully,

David Brent Miller Jr.