

## Nhi Atienza

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**From:** Bob Gerecke [REDACTED]  
**Sent:** Tuesday, October 4, 2022 8:30 AM  
**To:** Nhi Atienza  
**Subject:** ADDITIONAL COMMENT TO PLANNING COMMISSION ON HOTEL/MOTEL ORDINANCE

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners,

In addition, please consider that Auto Center Drive is a major source of sales tax revenue, which our City budget really needs for our economic sustainability. What we create at the nearby motels and thereby on the ground will affect whether Claremont residents and others will want to patronize or avoid Auto Center Drive.

Making prostitution and drug dealing easier, as the proposed ordinance would do, is not the way to go.

Bob Gerecke

## Nhi Atienza

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**From:** Bob Gerecke [REDACTED]  
**Sent:** Monday, October 3, 2022 11:46 PM  
**To:** Nhi Atienza  
**Subject:** Comment on Planning Commission agenda item: Motel Ordinance  
**Attachments:** Reviews for PC meeting - Jerry Klasik.docx; Consultant Report on Prostitution In I-10 Freeway Corridor 7-29-2022.pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Commissioners,

Instead of the proposed Hotel/Motel Ordinance, Claremont should duplicate a Long Beach ordinance called a "Nuisance Motel Ordinance". It sets standards and describes the process of forcing the motel to correct problems or denying them a permit to operate. It sets the stage to shut them down if they aren't managed properly.

- We all know how much prostitution we see on Indian Hill Blvd near our three motels at the I-10 freeway. 57 people demonstrated on Saturday 8/27. Prostitutes continue to be bold. One walked past the 57 people while they were protesting.
- The Courier's police blotter frequently reports drug use and drug dealing in, and on the property of, these motels.
- Motel managers know that there are traffickers/pimps, young women and drug buyers and sellers staying at their motels, but they continue to rent to them. Motel owners do not add them to a no-rent list, as a prior owner did.

The attached guest reviews for the motels show that people are shocked at the conditions. Motel owners are not managing their property in a safe and healthy condition.

The City staff has proposed an ordinance change that is worse than what we already have in the Municipal Code. There is no additional enforcement process. Pretending that their proposed ordinance is in response to the motel problems documented by the attached consultant's study they paid for, they are actually removing protections. Despite the findings of the study, the staff proposes:

- No more requirement that people staying in motels have another address. The motel can be their only address.
- No more requirement that a person can stay in the motel for at most 60 days in a half year.
- No more requirement that motel rooms must be rented for a minimum of 18 hours. The rooms can be used for "Day Use" for less money if the room is "closely monitored" (try to enforce that!), and then it can be re-rented.
- No requirement that photo identification is copied or that the motel clerk has to sign that he has seen a photo ID and is accountable that the person is the same.
- Groups can rent rooms and not personally sign in.

- Despite the Police Commission proposal that motels near the freeway have permitted parking where all visitors must sign in, the staff states that they “have not yet determined whether secured parking is feasible and safe for the freeway motels.”
- In our current Municipal Code, a residential motel was only allowed if the motel “is located in an area with a concentration of amenities for guests, including restaurant, retail, recreation, open space, and exercise facilities”. The new ordinance proposes to delete this.

Motels have many homeless people living there, paying with vouchers. Recently, the Knights Inn was filled with 90% voucher residents. Voucher residents struggling with their own issues will continue to be housed next to criminals who will prey upon them and whom bad management won't stop renting to, because they bring in money.

The proposed ordinance actually removes protections against prostitution and drug peddling, which will occur next to the many vulnerable voucher residents in every motel in town. And there are no clear steps for forcing motels to shut down if they violate our remaining more-permissive municipal code requirements.

Please reject the proposed ordinance and request that you be offered the alternative of the Long Beach “Nuisance Motel Ordinance”. If the proposed ordinance is enacted, the failures of the staff to enforce our standards for the past years may be turned into permanent Claremont law.

Thank you for your consideration and for your service on our most important Commission.

Bob Gerecke

## Reviews for PC meeting

### **Motel 6**

#### TRIPADVISOR

April, 2022 Absolutely filthy, neglected and dangerous.

Prostitutes and sketchy people in the parking lot....

Rooms absolutely reek of cigarette/pot smoke (even though our room was a "non smoking" room.

Very sad as this used to be a nice hotel. They literally don't care about cleanliness, customer safety OR a good night rest. It should be condemned by the health dept., as the balcony looks like it could collapse at any moment.

GROSS!!!

April 11, 2022: I checked into the hotel in the daylight and the hotel seemed dirty and sketchy. When we got into the room, it smelled like very strong chemical deodorizer. Almost choking. We aired it out and went to dinner. Came back at night and saw two nearly naked prostitutes walking near our room, and a room that looked like they lived there. There were parties in cars that spilled into rooms of dangerous looking people.

We left. the line was too long to check out in the lobby, and it felt unsafe waiting, and the phone went unanswered when I tried to call to check out.

I have stayed at many Motel 6's and 95% of them have been clean and good values. One other time it was dirty, but not dangerous. Please read other reviews of this hotel and you will see that others agree that it is dangerous and dirty. I would remove them from Motel 6 brand association as it is a terrible place.

#### **BOOKING.COM: Sept Won't be back until its cleared out**

Liked · the location. lots of restaurants near. right off fwy. had a fridge and microwave

Disliked · waaaaaaaaaaaaayyyyyyy toooooooo much illegal activity going on there. All hours of the night especially on weekends. Not a family place I was scared to let my kids go outside. Paid way to much for a facility with all that going on right outside and there was no notice of pool being not only open but that there wasn't even water in it.

#### September Very Poor

Liked · Location is good. Exit from freeway. There are lots of food options nearby., even walking distance from hotel.

Disliked · Pool and jacuzzi unavailable!!! They DO NOT have NON-SMOKING Rooms. All rooms are stinky to cigarettes and drugs!!!! This is unacceptable to spend time with family!!!! NEVER BOOK AT MOTEL 6 CLAREMONT!!!!!!

## Claremont Lodge

YELP

Kinya R Glendora, CA 9/18/2022

One word. Prostitution. Claremont should close this trash down. It's unsettling / disgusting watching young girls get dropped off here to "work". The fact that Yelp is threatening my speech is also concerning. The owners of this business know the crime going in here.

Teresa A. San Francisco, CA 8/14/2022

Do not stay here it was so bad.. on one of the beds there was blood on the sheets in the room... I went to the front desk because the phone in our room did not even work... the front desk went and handed us sheets and told me to change it my self. The floors in our room was so dirty that our socks where black .. the towels in the bath room where nasty ... they had blood stains on them .. then to top it off here was people out side our room like at 3 in the morning doing drugs ... for 160 I will never stay here again .. do not waste your money here...

BOOKING.COM

*Davis*  United States of America 1 night · April 2022 Solo traveler Reviewed: May 2, 2022

**As an elderly woman traveling alone, I did not feel safe and would not stay here again.**

Liked · Quiet. Close to the freeway. Close to good Thai restaurant and Starbucks.

Disliked · Did not like the location. Did not feel safe. Walking back from dinner, 4 police cars were in the parking lot.

# Prostitution in South Claremont I-10 Freeway Corridor: A Preliminary Assessment

## *C/O Futures Illicit Economy Research Note Series*

Robert J. Bunker and Mae Key-Ketter

29 July 2022

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Prostitution in south Claremont, CA along the I-10 freeway corridor and centered around three budget hotels (on both sides of the freeway) is a growing community concern due to its increasing prevalence and overt and emboldened nature. At times, it resembles an ‘open-air sex market’ with prostitutes coming and going with a general air of impunity. Prostitution has long been a malady within the city of Pomona (which lies to the south of Claremont) along an area of Holt Ave (known as the *Blade*). The prostitution problem in Pomona, however, has now metastasized to the point that south Claremont has also become feral with this activity.

**Key Information:** Mick Rhodes, “Prostitution sting nets arrests in Claremont and Pomona.” *The Claremont Courier*. 24 September 2020, <https://claremont-courier.com/latest-news/t38992-28448/>:

The world’s oldest profession took a hit last week when the Claremont Police Department and Pomona PD teamed up for a joint prostitution sting that netted nine arrests.

The sting took place in broad daylight September 17 near Indian Hill Boulevard and Holt Avenue. It involved an undercover Pomona PD officer in her thirties posing as a prostitute in order to lure customers, who were then arrested for misdemeanor solicitation.

Though the sting site was in Pomona, prostitutes working along Holt Avenue often bring their johns back to motels in Claremont, hence the joint operation.

“It’s kind of both our problems because a lot of times the way it works is the prostitutes are down walking around working near Holt Avenue and Indian Hill and that’s typically where they’ll pick up the johns from and then a lot of the prostitutes have rooms back at the Motel 6 and the Claremont Lodge,” said Sgt. David Hardin, Claremont PD’s lead for the joint operation and a 17-year veteran of the force.

“They’ll go down there, they’ll pick them up and then they’ll bring them back to the hotel. So that’s why it’s our problem.”

Claremont police have been stepping up patrols in the Indian Hill/10 freeway area of late after seeing a rise in criminal activity, specifically in and around the Motel 6, Claremont Lodge and Knight’s Inn.

“I’m sure you remember about month or so ago we had the two shootings that occurred at Motel 6,” Sgt. Hardin said. “One of the main issues that some of the criminal activity down there was revolving around was the increase in prostitution. That was the reason we conducted the sting.”

Eight of the nine men arrested were charged with misdemeanor solicitation...

...The September 17 sting started about 2 p.m. and finished up about 7 p.m. Police chose the relatively early in the day start time to avoid potential conflicts with any of the actual prostitutes that work in the area, Sgt. Hardin said...

...Though no money changed hands, once a verbal agreement is established between an undercover officer and a john, police have “the elements of a crime,” Sgt. Hardin said...

**Key Information:** Claremont Police Department, “Nine Prostitutes Arrested for Solicitation.”

*Facebook.* 9 September 2021

<https://www.facebook.com/ClaremontPoliceDepartment/photos/a.115161253400697/373712657545554/>:

Nine Prostitutes Arrested for Solicitation: On September 8, 2021, Detectives from the Claremont Police Department, along with Pomona Police Department’s Sexual Exploitation and Trafficking Team (SETT) conducted a prostitution sting in the area of Indian Hill Blvd and IS-10. Both police departments have received multiple complaints from residents, business owners, and passerby’s regarding the prostitutes working in the area. Throughout the day, beginning at 8:30am, the detectives were able to observe multiple violations of solicitation for prostitution by these individuals. After observing the violations, the subjects were contacted and ultimately arrested.

A total of nine suspects were arrested during the detail. They were transported to the Claremont PD Jail, where they were booked and later released. The suspects who were arrested were from as far away as Missouri, Nebraska, Nevada, and Arizona. Everyone that was arrested was offered resources and services to assist them in getting out of the lifestyle. One of them accepted the services and was immediately assisted.

Due to the current special directive set forth by District Attorney George Gascon, it is HIGHLY unlikely that these charges will be filed, however, the cases will still be presented to the District Attorney’s office for consideration. The Claremont

Police Department is committed to addressing the concerns brought forth by our citizens and will continue to enforce laws to the best of our ability.

ADDITIONAL: There are different types of “stings” that are done in order to control prostitution. The sting done yesterday was directed towards those selling sex with trained staff on hand ready to direct those contacted to resources. (We work closely with our local Project Sister who offers services for those involved in Human Trafficking). Those that chose not to accept the resources were booked on the charges of prostitution. We also do “reverse stings” where we target the male customers through the use of female officers as decoy prostitutes. When information is developed or obtained to arrest a “pimp,” then the “pimp” is arrested (our ultimate goal).

**Key Information:** Steven Felschundneff, “Claremont police work to address growing prostitution problem.” *The Claremont Courier*. 11 November 2021, <https://claremont-courier.com/city-government/claremont-police-work-to-address-growing-prostitution-problem-47606/>:

The growing problem of prostitution in Claremont seems to have reached a crescendo in the last few months, with residents in the south part of town reporting a significant increase in women soliciting customers on the streets adjacent to the intersection of Indian Hill Boulevard and the 10 Freeway. There have also been reports of people having sex in vehicles parked on side streets in the area...

...The police have fielded multiple complaints from business owners, residents and passersby who want to know what the city is doing to address this problem.

In response, Lieutenant Karlan Bennett gave a presentation at the police commission meeting providing an update on the department’s response to citizen complaints about prostitution.

For decades, prostitution has been more of a problem in Pomona, specifically on Holt Boulevard. In the past, sex workers who stay in south Claremont hotels would discretely leave their rooms and not start working until they reached Holt. Recently, however, the prostitutes are being more bold and begin looking for customers as soon as they leave the hotel property.

“It’s become pretty apparent in talking with Pomona officers and their conversations with the people they are contacting, that Indian Hill Boulevard has become an extension of Holt Boulevard. So that is one of the reasons why we are talking about this here in the City of Claremont tonight,” Lieutenant Bennett said...

...Claremont police partner with the Pomona Police Department’s Sexual Exploitation and Trafficking Team (SETT) to address prostitution enforcement. The department also works with the Federal Bureau of Investigation which has a specific human trafficking task force...



...Commissioner Caleb Mason asked if the city is ready to crack down on the hotels where the crimes seem to be originating, which reflects the will of many residents in the area. He suggested forming an ad hoc committee to explore the options including putting pressure on the city council to act.

“It seems pretty evident to me that there is a locus of crime of all sorts across the spectrum that is associated with particular businesses that don’t seem to be doing anything about it,” he said.

Lieutenant Bennett responded that the department works closely with the managers of the hotels and that officers are present there many times a day but certainly don’t have a permanent presence. He did note that one of the hotels had recently hired a security guard...

...The commission did form an ad hoc committee, including Margiotta, Mason and Frank DeLeo, to explore the options of controlling crime at the hotels.

**Key Information:** Steven Felschundneff, “Proposed ordinance puts crime onus on motels.” *The Claremont Courier*. 14 April 2022, <https://claremont-courier.com/latest-news/proposed-ordinance-puts-crime-onus-on-motels-64979/>:

Last Thursday, the Claremont Police Commission sent a clear message that prostitution and other crimes centered around the motels in the south part of town will no longer be left to fester.

By a unanimous vote, the commission passed a draft nuisance ordinance that, if adopted, would put pressure on the owners of Knights Inn, Claremont Lodge and Motel 6 to curb the criminal activities at their properties or face sanctions, including the possibility of losing business licenses.

The resolution is just a framework at this point, and it will be up to the city attorney and ultimately the city council to create the final ordinance. However, that could occur fairly quickly, according to commissioner Caleb Mason, who co-authored the draft ordinance.

Mason and fellow commissioner, Becky Margiotta, worked on the draft for several months as part of an ad hoc committee charged with addressing the growing problem. The committee was formed last year following frequent public complaints about the mostly young women, openly soliciting sex for sale in the area around Indian Hill Boulevard and the 10 Freeway.

Open and blatant prostitution seems to have escalated since Los Angeles County District Attorney, George Gascon, issued Special Order 20-07 under which his office will not prosecute certain misdemeanor offenses including loitering to commit prostitution...

...The ad hoc committee’s draft ordinance requires the managers or owners of the motels to keep a detailed register of guests, including capturing an image of the person’s identification document. Managers must refuse to rent a room to anyone who does not provide acceptable identification.

Any guest paying with cash would also have to present a valid credit card that the manager would then be required to verify through the card issuer.

The motel managers would be prohibited from renting rooms for less than a full day’s rate, and can’t re-rent the same room again for an 18-hour period if someone checks out early. For example, if somebody checks in at 9 p.m. that room would not be available again until 3 p.m. the following day.

All of the motels must install and maintain closed circuit television cameras “sufficient to maintain continuous visual coverage of all common areas and all parking areas.” And the video footage must be maintained for a minimum of 30 days.

The owners and managers must make everything covered under the ordinance — including register logs, records, common areas, parking lots and video — available to law enforcement upon request.

Additionally, the committee recommends that “the city council should direct the city attorney to research and consider available legal processes, including potential actions and remedies under California’s public nuisance and Red Light Abatement laws.”

Most of the provisions in Claremont’s draft came from the city of Long Beach’s ordinance, which officials there have found to be very successful in reducing crime.

Following a short discussion, the commission elected to add language to the draft ordinance that required parking areas be restricted to registered guests and visitors who agreed to show an ID...

...The task of enforcing the ordinance would fall not only on the shoulders of police, but on any employee who conducts code or public safety enforcement...

...The next step will be for City Attorney Alisha Patterson to evaluate the draft, and to work with the council on a final version. After that it would be placed on a future city council agenda for public input and a final vote.

**Key Information:** Claremont Police Department, “Human Trafficking Awareness Symposium.” *Facebook*. 5 May 2022, <https://www.facebook.com/photo/?fbid=340390238193232&set=a.319542526944670:>

The Claremont Police Department, along with Project Sister Family Services and other community partners, will be hosting a Human Trafficking Awareness Symposium on Monday, May 16 at 7pm at the Hughes Center. There will also be special presentations from the Inland Valleys Anti-Human Trafficking Task Force and the Pomona Police Department's Sexual Exploitation and Trafficking Team (SETT).

**Key Information:** Claremont Police Department, "PRESS RELEASE: Claremont Police Make Ten Arrests During Special Hotel Crime Suppression Detail." *Facebook*. 18 May 2022, <https://www.facebook.com/photo/?fbid=348956744003248&set=a.319542526944670>:

On Thursday, May 12, 2022, the Claremont Police Department executed a special crime suppression detail at the hotels adjacent to the 10 Freeway along Indian Hill Boulevard.

Nine officers worked the direct crime suppression detail in the south section of Claremont from 5:00pm to 1:00am. During the eight-hour detail, Officers made ten arrests.

Officers arrested one individual in possession of a loaded concealed firearm and made a second arrest for possession of a "Ghost Gun" along with an extended gun magazine. A "Ghost Gun" is a homemade firearm that lacks a serial number and is untraceable.

The other arrests ranged from possession of Oxycodone and Xanax laced with fentanyl for sale, possession of narcotics, soliciting on the freeway, driving on a suspended driver's license, and warrant arrests. Officers issued two hazardous citations and impounded one vehicle.

The special crime suppression detail was coordinated in response to concerns from residents and businesses about the increase in criminal activity in the area surrounding the hotels. The City and the Claremont Police Department have been working with the hotels' management as well as adjacent property owners to clean up the area and address crime. The Claremont Police Department is also collaborating with the Pomona Police Department, District Attorney Gascon, Project Sister Family Services, and the Committee for Safe and Healthy Housing to provide education, outreach, and resources related to human trafficking in the region.

**Key Information:** Ginger Elliot, Sonja Stump, Jim Keith and Al Villanueva, "Viewpoint: Taking back the streets of south Claremont." *The Claremont Courier*. 26 May 2022, <https://claremont-courier.com/latest-news/viewpoint-taking-back-the-streets-of-south-claremont-65922/>:

On Monday, May 16, at the City of Claremont's Human Trafficking Symposium at the Hughes Center, residents showed up en masse and overwhelmingly responded

to a growing cancer that must be eradicated at the South Claremont corridor of the I-10 Freeway and Indian Hill Boulevard: the out of control sex trafficking, prostitution, criminal behavior, and drug use and dealing at the Knights Inn, Motel 6 and Claremont Lodge. It has become the biggest eyesore in the City of Claremont and is threatening the tranquility and public safety of our community...

...Prostitution is a serious mental health issue that threatens the future welfare of children, both female and male. Children who grow up in emotionally abusive and dysfunctional homes are vulnerable to the sex trafficking trade. Most women, including minors, who are being prostituted have gone through a lot of emotional and physical trauma and abuse. The street and organized prison gangs who recruit the vulnerable for the sex trade use these innocents for monetary gain.

Christina Jimenez, keynote speaker from Project Sister, (a nonprofit that provides healing services for abused women), noted during the symposium, that the “dollar value of sex trafficking is as much if not more than drug trafficking in the Pomona Valley.”

One of the unintended consequences of the COVID pandemic during the last three years is the proliferation of mental health issues, including increased drug use and suicides, mass shootings, increased gang activity and violence, and the streets along south Indian Hill Boulevard becoming saturated with street prostitution...

### **What are we as a community to do?**

If the cancer is not addressed, it will only spread. We have to take back the streets of south Claremont...

...The Claremont City Council must adopt a city ordinance like that of the City of Long Beach to hold accountable the motels and businesses that foster the sociological and economic conditions of street prostitution. Property management of the rogue motels must provide deterrence and not allow crime to fester on their motel grounds.

But the most important component of community policing is the understanding that justice is restorative and not retributive. Incarceration is a dehumanizing experience. Nonprofits like Project Sister and Tri-City Mental Health must step up to the plate and provide alternatives of healing to young prostitutes, addicts, gang members and lost ones who are lost in the culture of despair with no hope.

**Key Information:** Steven Felschundneff, “Killing brings urgent focus on Claremont area motel crime.” *The Claremont Courier*. 21 July 2022, <https://claremont-courier.com/latest-news/killing-brings-urgent-focus-on-claremont-area-motel-crime-66914/>:

The killing of a young man at the Claremont Lodge this week has cast a renewed focus on the many problems emanating from the motels adjacent to Indian Hill Blvd. and the 10 Freeway in Claremont.

Criminal activity associated with the Claremont Lodge, Motel 6 and Knight's Inn motels is nothing new, as anyone who reads the Police Blotter can attest. But Claremont police have noted a marked increase in activity they attribute to Los Angeles County District Attorney George Gascon's special directive 20-07, which instructed his staff not to prosecute certain misdemeanor crimes.

One of the crimes covered under the special directive is loitering to commit prostitution, which police say has led to a sharp increase in the sex trade in and around these motels. Beginning in January, [Senate Bill 357](#), which was recently signed into law by Governor Gavin Newsom, will make loitering for prostitution legal in California.

To educate the public about what occurs at Claremont's southern border, officers from the Pomona Police Department's Sexual Exploitation Trafficking Team have presented two primers about street prostitution and human trafficking, most recently at the July 7 police commission meeting.

During the meeting, PPD officer Sean Gonzalez painted a stark picture of street sex work in Pomona, which has historically taken place along Holt Avenue, but in recent years has migrated north on Indian Hill Boulevard, reaching the motels in Claremont. The sex trade, including many of the sex acts themselves, often take place in cars along residential streets adjacent to Holt and Indian Hill, he said.

Police said many of the sex workers, both minors and adults, work for pimps engaged in the lucrative business of exploiting them for profit, and some of these mostly young women work against their will.

"Most exploiters have ties to organized crime and criminal street gangs and see the sex industry as less dangerous and more profitable than narcotics or other criminal enterprises," Gonzalez contended...

...On Wednesday, the COURIER called the three problematic motels to ask what management was doing to actively combat sex work at the properties.

A person called Frankie who answered the phone at Motel 6 transferred the call to a "DM," who did not pick up the phone. A man at the Knights Inn said the question could only be answered by a manager, then hung up when asked for the manager's name. At the Claremont Lodge, a woman named Jessica said she didn't know anything about sex work at the motel and recommended calling back to speak with a manager, who had left for the day.

To help combat sex trade, as well as other criminal behavior at the motels, the city is working on a special nuisance ordinance, and is currently gathering input from stakeholders and those in the motel industry. The city tentatively plans to present the ordinance to the planning commission and city council this fall, according to City Attorney Alisha Patterson.

That ordinance would be part of a three-pronged approach combined with the threat of a “red-light abetment lawsuit,” and a stepped up focus on ensuring compliance of existing rules at the motels, which could include both policing and code enforcement.

## Imagery

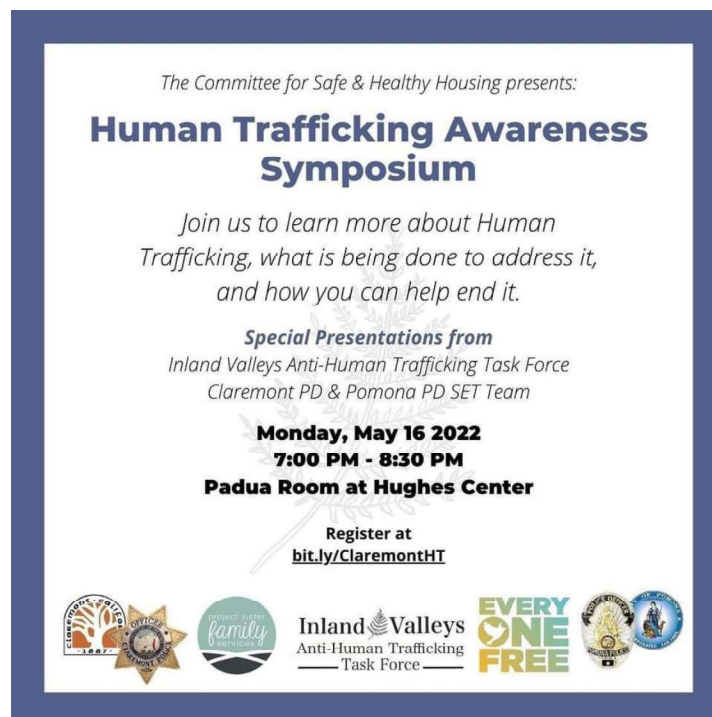


Image 1. Human Trafficking Awareness Symposium.  
Source: Claremont Police Department (Posted 5 May 2022).[1]



*Image. 2. Prostitute Soliciting a Potential John in South Claremont, CA.  
Source: Claremont Police Department (Posted 9 September 2021).[2]*



*Image 3. Blade Area of Holt Ave and East End Ave, Pomona, CA.  
Source: The Authors (6:45 PM, 14 July 2022).*



*Image 4a & 4b. East End Ave and Holt Ave & St. Paul St and East End Ave;  
Blade Areas, Pomona, CA.*

*Source: The Authors (7:30 PM, 26 July 2022).*



*Image 5. Walking Back from a South Claremont Hotel to Holt Ave Blade.  
Above Lincoln Ave on Indian Hill Blvd, Pomona.*

*Source: The Authors (7:15 PM, 27 July 2022).*





**Bobbyink E.**  
Ventura, CA  
📍 90 📅 18 🗨️ 3

★☆☆☆☆ 10/13/2020

This place is dangerous period!!! Definitely Lock the doors to your car at this location. There's a lot of prostitution, some parties and fights at this location. I was also asked where I was from by a couple gang members here, not to mention the drug attic's lurking around asking for change or foil. I mean who asks for foil at 6am, I know your not trying to bake a cake.

👍 Useful    😄 Funny    🧊 Cool



**Cry B.**  
Phillips Ranch, Phillips Ranch, CA  
📍 0 📅 20 🗨️ 1

★☆☆☆☆ 7/17/2021

OK first off let me tell you if you are with a family this is NOT the place this place has pimps and prostitutes and DRUG calls...literally all over the place you get a show if you sit in your car and you watch I had a condom wrappers outside my car not to mention I asked for a downstairs unit because I have a handicap and I was given an upstairs unit no elevator!!!! Yes they take animals that's great but so does Extended Stay America and they are clean and nice and have a kitchen and for about the same price. Clean up the trash literally the trash around the place and the actual trash around the place it looks tacky. #MotelSex #Motelpimp

👍 Useful 1    😄 Funny    🧊 Cool



**Mike B.**  
Pomona, CA  
📍 0 📅 3

★☆☆☆☆ 11/16/2021

This is a motel for hookers. I used to live around here and pimps would buy this place up and let the tricks walk down to holt. I would never rest my head there hookers and John's buisness everywhere.

👍 Useful    😄 Funny    🧊 Cool



**S B.**  
Santa Clarita, CA  
📍 0 📅 8 🗨️ 2

★☆☆☆☆ 4/12/2022

Absolutely filthy, neglected and dangerous.  
Prostitutes and sketchy people in the parking lot...  
Rooms absolutely reek of cigarette/pot smoke (even though our room was a "non smoking" room. Very sad as this used to be a nice hotel. They literally don't care about cleanliness, customer safety OR a good night rest. It should be condemned by the health dept., as the balcony looks like it could collapse at any moment.  
GROSS!!!

👍 Useful 1    😄 Funny    🧊 Cool

*Image 6 Sequence. South Claremont Hotels Yelp Review Examples, 2020-2022.[3]*

**Proposed Motel Ordinance**

**(Draft Language to Be Reviewed/Edited as Necessary by City Attorney)**

- A. Every owner, manager or operator of any hotel or motel within the City shall keep a register in which shall be entered the name and address of each guest, and a photograph or scanned image of the guest's Identification Documents as defined herein, prior to the guest's occupancy of any room, and which shall record which guest has rented which room. No owner, manager or operator of any hotel or motel shall let, lease, or rent a hotel or motel room to any person without first reviewing and photographing or scanning the guest's Identification Documents, as set forth herein.
- B. Acceptable Identification Documents are, exclusively, any one of the following documents: (1) current U.S. Passport; (2) current state-issued driver's license; (3) current state-issued non-driver identification card; (4) current United States military identification. An Identification Document accepted by the owner, manager, or operator of any hotel or motel within the City must include a photograph of the guest presenting it that the owner, manager or operator of the hotel or motel recognizes as a photo of the guest. For avoidance of doubt, any document that is represented by a guest to be one of the above documents, but which does not include a photo, or does not include a photo that the owner, manager or operator of any hotel or motel recognizes as the photo of the guest, is not an acceptable Identification Document under this provision.
- C. No owner, manager, or operator of any hotel or motel shall, let, lease, or rent a hotel or motel room to any person who does not (a) present one of these Identification Documents, and (b) permit the Identification Document to be photographed or scanned and maintained by the owner, manager, or operator of the hotel or motel pursuant to this ordinance.
- D. The register shall indicate the day, month, year and hour of arrival of each guest and the number or other identifying symbol of location of the room, dwelling unit or space rented or assigned each guest and the date that such guest departs. Each entry in the Register shall also include a photograph or legible scan of the Identification Document presented by the guest associated with that entry. The individual employee, owner, manager, or operator who examines the Identification Document presented shall also sign the register attesting to his or her examination of the Identification Document and confirmation that the photo is that of the guest. All such Registers shall be maintained for a period of three (3) years from and after the date of entry. No person shall alter, deface or erase such a register so as to make the information recorded therein illegible or unintelligible.
- E. No owner, manager, or operator of any hotel or motel shall, let, lease, or rent a hotel or motel room for any rate less than a full day's rental rate.
- F. No owner, manager, or operator of any hotel or motel shall, let, lease, or rent any hotel or motel room more than once in any 18-hour period. The following example illustrates this provision for avoidance of doubt: if a room is rented at 9 p.m., that room shall not be rented again until at least 3 p.m. the following day.
- G. No owner, manager, or operator of any hotel or motel shall accept cash as payment for letting, leasing, or renting any hotel or motel room within the City, unless such owner, manager, or operator of any hotel or motel also obtains from the guest a valid credit card, and confirms the validity of the credit card with the credit card issuer, for an amount at least equal to a full day's rent, prior to the guest's occupancy of any room.
- H. Every owner, manager or operator of any hotel or motel within the City shall install and maintain in good working order closed-circuit television (CCTV) cameras sufficient to maintain continuous visual coverage of all common areas and all parking areas. The video footage from these cameras must be maintained by the owner, manager or operator for a minimum of 30 days before it is erased or overwritten.
- I. Inspection of all books, records, files, common areas, parking areas, and video footage maintained under this Ordinance, of all hotels and motels that are open for business within the City, may be made at any time by any member of the Police Department for the purpose of determining that the provisions of this Section are met. Refusal to allow such inspection is a violation of this Ordinance.

*Image 7 Sequence. City of Claremont Proposed Motel Ordinance, 7 April 2022.[4]*

**Who:** Derived from field observations by the authors these are female prostitutes, predominately Black but also Hispanic and White, who are engaging in sexual activities with paying customers (johns).[5] Pimps, who terrorize and oversee the prostitutes—and also traffic them—are readily involved (as well as their top girl—“the bottom”—who serves as their chief lieutenant) but more covert in their activities. Street taxes paid to organized street (and prison-linked) gangs are quite common and typically associated with these activities which potentially generate large sums of cash for a pimp (or more organized crew) on a daily basis.

**What:** Soliciting or engaging in the act of prostitution [California Penal Code section §647(b)]. Such activities are being facilitated by open solicitation in parking lots and on the street in south Claremont and north Pomona or arranged via online or texting methods and then engaged in at south Claremont hotels as well as being conducted in parked vehicles in out of the way areas such as in parking lots or behind buildings. Johns will often pick up the prostitutes in their cars and drive over to the budget hotels where the couple (or more) will go to a hotel room to engage in a money for services offered transaction.

**When:** The prostitution and related activity (i.e., petty narcotics sales) is primarily taking place during the late afternoon and evening/early morning (nighttime) hours.

**Where:** The illicit activity is taking place in the south Claremont I-10 corridor on both sides of the I-10 freeway centered around the three hotels (Knights Inn, Claremont Lodge, and Motel 6) as well as extending south into north Pomona down Indian Hill Blvd into the *Blade* along Holt Blvd.[6]

**Why:** The budget hotels in south Claremont represent a readily exploitable resource (low-end hotel rooms and lax booking requirements and oversight) that the prostitution component of the illicit economy in Pomona (centered on the *Blade* on Holt Ave) has utilized to extend its activities into the I-10 freeway corridor.

### C/O Futures Analysis

Pomona has had a long and sordid tradition of prostitution centered on the *Blade* that had formed along Holt Ave some decades ago. This is primarily due to the fragile social structures and limited political capacity of the city. One based on a large population but very constrained financial resources due to its loss of industries and a lower social economic (working class) demographic contributing to a marginal tax base. As revenue streams are consequently limited for policing and the delivery of other community goods, this has resulted in the inability of the community to fully suppress prostitution and related criminal activities, such as human trafficking linked to dedicated rings and street gangs, from taking place.[7] Still, the Pomona Police Department (PPD) has engaged in various operations, campaigns, and undercover stings over the years in an attempt to suppress prostitution activity as much as it can.

*Blades* shift over time with the present one situated on the north side of Holt Avenue concentrated in the vicinity of East End Avenue through Saint Paul Street and extending well over to Clark Avenue and beyond.[8] The illicit business transactions that take place are carried out behind commercial buildings, in parked cars, or in one of the many cheap Pomona motels that exist around

the *Blade* (which are typically more affordable than the hotels in Claremont).[9] Still, at some point in time (undetermined as of this note), the budget hotels in south Claremont became increasingly linked to this *Blade* with discreet liaisons between prostitutes and johns ensuing. This relationship between the Pomona *Blade* and the south Claremont budget hotels had remained low key for some time. With the prostitution cross associations between Pomona and Claremont taking place and the expected normal cooperation between neighboring policing agencies, numerous instances of combined, as well as Claremont or Pomona specific, prostitution stings and arrests have taken place over the past five years or so.[10]

The current overt and blatant prostitution situation along the south Claremont I-10 Freeway corridor has been increasingly documented and discussed in the news media and in Claremont Police social media (refer to the **Key Information** section contained in this note) since at least the end of 2021. The extent of this threat to the community has been acknowledged by city and police officials, local leaders, and concerned citizens—and even mentioned in *Yelp* hotel reviews (*Image 6 Sequence*) over the last few years. As of the writing of this note, it is still an ongoing endeavor that has been recently confirmed by the authors' field observations. Prostitutes and johns were actively observed coming and going to hotel rooms in at least one of the budget hotels (the Motel 6) and prostitutes were also viewed walking down under the I-10 overpass on Indian Hill Ave as they were starting their trek back to Pomona.[11] It would be fair to say that Claremont, as a whole, has been somewhat blindsided by these events and even now is reactively attempting to address it. Those living and working within the afflicted area where this component of the illicit economy has taken hold have watched incrementally as this social cancer has set in and metastasized.

The generators of the prostitution now openly established in south Claremont, and the collateral ferality in terms of drugs and violence that comes with it, appear to be as follows:

- The COVID-19 pandemic hitting full force in the early months of 2020 and continuing on well into 2021 (with various surges and shutdowns taking place) has been both a national US and subsequently Claremont specific challenge to the economic and social integrity of communities and governance. With people losing their livelihoods, students being isolated from their friends, and homelessness levels increasing a mental health crisis ensued. Ultimately, City of Claremont economic and personnel resources were highly strained with lower levels of incivility (& criminality) being overlooked as basic community and policing services were prioritized. As a result, various forms of criminal activity—such as prostitution and the organized groups and individuals participating in it—have taken advantage of this societal and governance crisis by actively exploiting new illicit market niches and location opportunities that presented themselves.
- The budget hotels in south Claremont are businesses first and foremost—their intent is to generate profit for their owners (be it a franchise owner, stockholders, et al). The hotels in south Claremont cater to the lower social-economic strata of society (based on their price points) and typically view a customer as a customer. Managers and staff have in the past turned a blind eye to prostitution taking place in and on their premises, but more so while they faced economic hardship during the pandemic as they became desperate in their need to generate revenue. Over the last few years, this has become a slippery slope wherein those hotels have increasingly become associated with prostitution which in turn has limited their

attractiveness for many individuals and families (within the lower social-economic strata) renting their rooms.

- The Claremont Police Department (CPD) has finite economic resources provided to it and allocates them in a process of resource allocation triage in terms of how and where it can direct them. The CPD has not been able to sustain anything near a full-time late afternoon / evening through early morning presence (based on principal illicit economy operating times) in the vicinity of the budget hotels. At best, sporadic presence has been maintained although, with the more recent spotlight on this community threat, CPD unit dwell times and undercover operations have undoubtedly increased. Still, prostitutes overtly hang out and /or walk around the hotels, local businesses, and sidewalk areas as they eventually head back down to Pomona (assuming they are unable to secure a new trick locally). This is because even overtly deployed Claremont police units are of marginal value for deterrence purposes.
- Los Angeles County District Attorney, George Gascon, who issued Special Order 20-07 (which took effect 7 December 2020)[12] has directed his office personnel not to engage in the prosecution of loitering to commit prostitution charges (a misdemeanor offense; Penal Code §653.22). This has removed a tool that can be utilized by CPD to deter prostitutes from being able to position themselves (loiter) in south Claremont on the side of a street / sidewalk and in parking lots in order to engage in solicitation for their sexual services. Given the new state bill signed by the current California governor (which will take effect 1 January 2023), this anti-loitering tool will now be fully removed from the table by state statute.[13]

The community threat of ongoing and blatant prostitution taking place in Claremont's I-10 corridor is multilevel. At the physical level, overt prostitution, petty drug deals (and in some instances use), and the loitering of groups of individuals is readily apparent and give the area a feral edge to it. Public and business spaces have been co-opted by various street denizens, many with mental health challenges, with the illicit (and barter) economy being increasingly overlaid on top of the traditional formal one. Members of street gangs (either current or former) are also sporadically represented and easily identifiable by their arm, neck, and, in some instances, facial tattoos. This mix of elements makes for very real street criminality and violence potentials witnessed by the pattern of ongoing incidents as chronicled in Claremont Police Department call outs and arrests highlighted weekly in *The Claremont Courier* 'Police Blotter' section.

At the psychological level, living and working in a residential and business community plagued with petty street criminality and the associated violence that comes with it brings about the ongoing stress of fearing for one's safety and the ambiguity of not knowing when one will be subjected to uncivil behavior (erratic actions and panhandling), solicitation for sexual services and drug sales, intimidation, and escalating forms of criminality tied to robbery and physical harm. Young women wearing certain types of clothing in the I-10 Corridor can become mistakenly identified as being 'in the industry' and solicited by johns and potentially stigmatized by others in the community. For children raised in such an environment, the detrimental effects on their mental health and development are pretty clear. When street solicitation, drug deals and use, and other forms of street criminality are constantly being viewed, over time they become accepted as the new normal of their childhood and everyday life.

Further, the damage to Claremont’s reputation as a center of learning (the small-town college economy) and as a great community in which to raise children has to be considered. Long viewed as the “Oxford of the West” and the “City of Trees and PhDs,” the open-air sex bizarre which has developed around the budget hotels in the south of the city brings with it the counter-narrative of “Stumps and Chumps” and other derogatory labels.[14] Already, we are starting to see an increasing socio-economic division of the community with the emergence of a ‘no-go area’ where mid and north Claremont residents will not enter based on perceptions of high crime and concerns over their personal safety. This stigmatizes those upstanding citizens living in these areas and negatively impacts their property values.

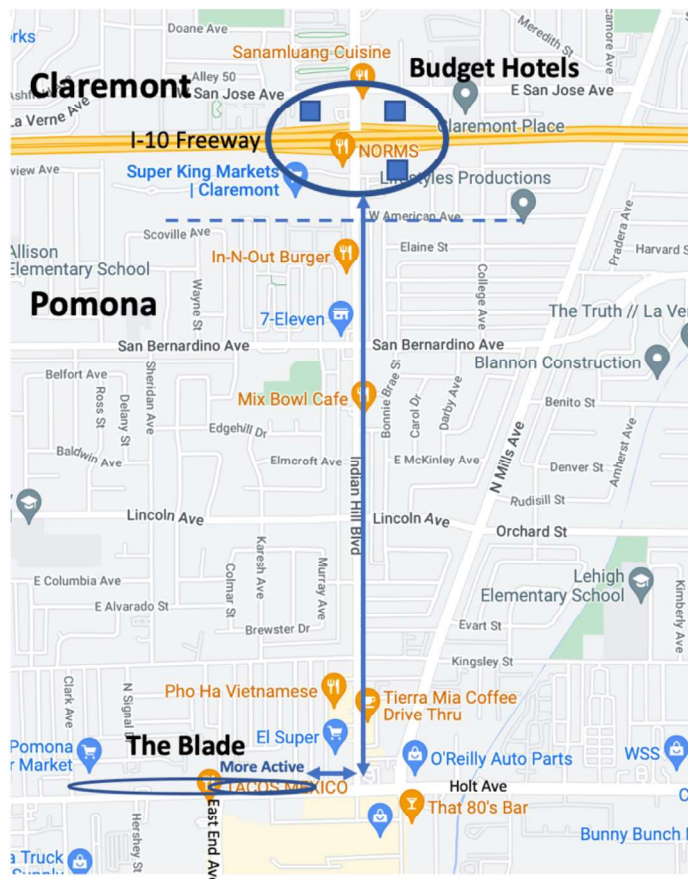


Figure 1. South Claremont I-Freeway Corridor and Relationship to the Blade in Pomona

The south Claremont prostitution situation is being openly discussed in various city government settings and community involvement with an initial Human Trafficking Awareness Symposium was held on the 16<sup>th</sup> of May 2022. Presently, per the *Claremont Courier*, the City of Claremont via its Police Commission ad hoc committee is engaging in a three-pronged approach to address this community threat:

- First, it is looking to enact a Long Beach city modeled ordinance to respond to the increased and overt nature of prostitution taking place. The onus of the ordinance is placed on the hotels themselves who can face sanctions, even potentially losing their business licenses, if they do not cooperate with city statute’s. Aspects of the ordinance include requiring and storing an image of those renting rooms, with cash payments validated by

credit card authentication so that false IDs are discovered / identities are confirmed. Rooms rented hourly and / or turned over too quickly due to early check outs (based on certain criteria) would also be stipulated against in this anti-prostitution ordinance as would the installation of a close circuit television (CCTV) system covering common areas with tapes retained for 30 days which are accessible to the CPD on demand.

- Second, a notional follow-on “red-light abatement lawsuit” has been floated (as a warning shot across the bow) which would be directed at the motels in question if they did not comply with current and future city ordinances and business regulations. The Claremont city legal team is still looking into the potential viability of this hotel compliance tool if the need existed.
- Third, the City is interfacing with the three budget hotels in the I-10 corridor to ensure compliance with existing rules and regulations that they are required to operate under. This is apparently being done via both policing and code enforcement personnel.[15]

For the components and wording (A.-I.) of the actual Ad Hoc Committee’s proposed motel (hotel) ordinance—subject to review and editing by the Claremont City Attorney—refer to *Image 7 Sequence*.

Further, based on the authors’ field observations conducted in June and July 2022, marked police units have been parking in overt positions in and around the I-10 corridor—such as on the local streets and in the hotel and nearby business parking lots—to serve as an attempted deterrent against prostitutes, pimps, and johns engaging in their activities. The dwell time of these units has been limited, however, due to finite staffing resources and the previous question of the actual deterrence value given Special Order 20-07. Undercover activities conducted by Claremont police and affiliated task force units have also been ongoing.

At the political level, the City Council and various city departments are working together with an ad hoc Police Commission committee—the Hotel Ad Hoc Committee (March 2022) / Ad Hoc Committee on Crime Related to City Motels (April 2022)—to create regulations and policies to respond to the south Claremont prostitution problem.[16] At the law enforcement and policing level—in addition to the Claremont Police Department—the Pomona Police Department’s Sexual Exploitation and Trafficking Team (SETT) and the Federal Bureau of Investigation’s (FBI) Child Exploitation and Human Trafficking Task Force via the local field office are also providing support. Non-governmental and non-profit organizations, are also increasingly involved in the response effort, including Project Sister Family Services, the Committee for Safe and Healthy Housing, Tri-City Mental Health, Every ONE Free, and the Inland Valley Anti-Human Trafficking Task Force.

In addition to present City of Claremont, Police Commission ad hoc committee, and Claremont Police Department efforts (all of which are still evolving and adjusting to the situation), it is suggested that a more robust and methodical operational (response) plan should be developed. The plan should contain a preliminary component which seeks to characterize the illicit economy (prostitution and petty narcotics sales; along with its imbedded human trafficking component) which has taken firm root in south Claremont and its interrelationship with the similar and pre-

existing illicit economy centered on the *Blade* on Holt Ave. Derived from these characterizations and mapping, a targeting and resource plan should be constructed that seeks to degrade and disrupt this illicit economy in south Claremont and, ultimately, seeks to eradicate it as much as is reasonably achievable (intractable facets of the illicit economy can normally only be suppressed but never fully eliminated).

From a targeting perspective, the response plan would specifically address the groups and individuals engaging within the illicit economy and their linkages to licit activities such as hotel room bookings and even potentially liquor store sales. These groups and individuals can be responded to with an escalatory response continuum which runs the gambit from behavioral shaping and deterrence through arrest and prosecution.[17] Decision tree response protocols should be constructed as a means of doctrinal development into this document much as would be in a response playbook. Further, a victim support component must be created within the plan for those groomed, trafficked, and brutalized (much like cultist grooming) into the sex worker lifestyle.

Such proactive planning—using All of Government (AOG) and All of Community (AOC) resources—would be a natural progression from the current ad hoc and admittedly reactive Claremont public and policing policy processes. Ultimately, the City of Claremont represents a community which exists within the contested south Claremont physical space (operational environment) of the I-10 Freeway corridor and ultimately has the resources to shape that environment via the policies and programs it enacts. It is thus imperative that it act to restore greater quality of life to its south Claremont citizens and provide a better business setting for the conduct of legitimate commerce in that region of the city.

**Keywords:** Blade, Claremont, Human Trafficking, Illicit Economy, Organized Crime, Pimps, Pomona, Prostitution, Sex Trafficking

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## Endnotes

[1] Claremont Police Department. *Facebook*. 5 May 2022, <https://www.facebook.com/photo/?fbid=348956744003248&set=a.319542526944670>.

[2] Claremont Police Department. *Facebook*. 9 September 2021, <https://www.facebook.com/ClaremontPoliceDepartment/photos/a.115161253400697/373712657545554/>.

[3] For *Yelp* reviews of the south Claremont budget hotels go to; <https://www.yelp.com/biz/knights-inn-claremont-claremont>, <https://www.yelp.com/biz/claremont-lodge-claremont-2>, and <https://www.yelp.com/biz/motel-6-claremont-2>.

[4] “Claremont Police Meeting Agendas.” 3 March 2022-7 April 2022, <https://www.ci.claremont.ca.us/home/showpublisheddocument/18047/637843224068770000>.

[5] The preponderance of Black female prostitutes observed generally correlates with Pomona Police Department arrest statistics. They are as follows: “81% of those arrested by the Pomona Police Department’s Sexual Exploitation Trafficking Team over the last three years are women. They are also overwhelmingly people of color — 59.5% are Black, 26.6% are Hispanic and just 12.4% white.” Steven Felschundneff, “Killing brings urgent focus on Claremont area motel crime.” *The Claremont Courier*. 21 July 2022, <https://claremont-courier.com/latest-news/killing-brings-urgent-focus-on-claremont-area-motel-crime-66914/>. Male prostitutes undoubtedly frequent the south Claremont budget hotels also but were not as easily detectable.

[6] San Jose Ave is viewed as the firebreak below where prostitution takes place in Claremont, however, residents living in the community of homes in the lower Citadel Avenue area have in the past expressed some alarm over prostitutes sleeping in parked vehicles under the cover of darkness in their neighborhood. Also, one resident of the community in the past has observed

what appears to be prostitutes walking through their neighborhood just north of Oakmont Cemetery.

[7] For basic information on human (sex) trafficking tied to gangs, see *Gangs and Human Trafficking*. National Gang Center. 31 January 2020, <https://nationalgangcenter.ojp.gov/insights/47/gangs-and-human-trafficking>.

[8] The Holt *Blade* fluctuates in size with shifting concentrations of prostitutes. One recent characterization is that it is a mile long stretch. Nate Jackson, “How LA County’s Sex Worker Diversion Program Started With the Determination of One Public Defender.” Golden State Lawyer. 25 April 2022, <https://www.goldenstatelawyer.com/2022/04/how-la-countys-sex-worker-diversion-program-started-with-the-determination-of-one-public-defender/>.

[9] Pomona has focused its efforts on these cheap motels (and hotels) near to the Holt *Blade* by various statutes and requirements (such as not allowing hourly room rentals and the installation of security cameras / CCTV) in order to try to stamp out, or at least lessen, the prostitution taking place within them. See, “Pomona Motel to Take Steps to Curtail Prostitution, Human Trafficking, DA Says.” *NBC Los Angeles*. 4 September 2020, <https://www.nbclosangeles.com/news/local/pomona-motel-to-take-steps-to-curtail-prostitution-human-trafficking-da-says/2423603/> and Javier Rojas, “Pomona bans hourly motel rates to combat human trafficking.” *Daily Bulletin*. 21 October 2020, <https://www.dailybulletin.com/2020/10/21/pomona-bans-hourly-motel-rates-to-combat-human-trafficking/>.

[10] Additional regional police departments are providing mutual aid and even the California Highway Patrol may also support these suppression activities. Some examples of arrests and operations include, Ashley Ludwig, “Deputy Sentenced For Soliciting Prostitute In Claremont.” *Patch*. 10 May 2017, <https://patch.com/california/claremont-laverne/deputy-sentenced-soliciting-prostitute-claremont>, Stephen Ramirez, “7 arrested in latest Pomona prostitution sting on Holt Avenue.” *The Daily Bulletin*. 7 January 2018, <https://www.dailybulletin.com/2018/01/07/7-arrested-in-latest-pomona-prostitution-sting-on-holt-avenue/>, Brian Day, “18 Suspects, Including 91-Year-Old Man, Arrested During Pomona Prostitution Sting.” *KTLA News*. 9 March 2019, <https://ktla.com/news/local-news/18-suspects-including-91-year-old-man-arrested-during-pomona-prostitution-sting/>, and Mick Rhodes, “Prostitution sting nets arrests in Claremont and Pomona.” *The Claremont Courier*. 24 September 2020, <https://claremont-courier.com/latest-news/t38992-28448/>. For a critical view of these local law enforcement activities from the perspective (purportedly) of the safety and needs of sex workers, see Zipline Adventures, “Prostitution in Pomona California USA.” *YouTube*. 21 March 2021, [https://www.youtube.com/watch?v=e2o8r9\\_MxMk](https://www.youtube.com/watch?v=e2o8r9_MxMk).

[11] The prostitutes walking back down Indian Hill towards the *Blade* on Holt Ave are typically observed talking on their phones. The assumption is made that their pimp and /or the bottom are constantly in contact with them so that they do not stray or are left unmonitored if approached by other another pimp driving up on them for poaching purposes. Also they need to coordinate with their pimp where to transfer the cash that they obtained from their recent trick (sexual transaction).

[12] George Gascon, “Special Directive 20-7.” LA County District Attorney’s Office. 7 December 2020, <https://da.lacounty.gov/sites/default/files/pdf/SPECIAL-DIRECTIVE-20-07.pdf>.

[13] Some groups support this special order as protecting communities of color, disadvantaged women and transgender adults, and the mentally ill from being specifically targeted by draconian street policing policies. Components of this special order which seek to decriminalize various misdemeanor offenses have been elevated to the California state level via a new law (Senate Bill 357) signed by Governor Newsom which repeal anti-loitering statutes (California Penal Code Section 653.22). See Hannah Wiley, “California repeals anti-loitering law that sparked debate over decriminalizing sex work.” *Los Angeles Times*. 1 July 2022, <https://www.latimes.com/california/story/2022-07-01/gavin-newsom-signs-bill-to-repeal-californias-anti-loitering-law-debate-sex-work>.

[14] Various regional *Blades* exist in Southern California in addition to the one in Pomona. San Bernardino, for example, has a very active one on G Street that has greatly negatively impacted the community in which it is embedded. This information is derived from one of the author’s direct observations coupled with law enforcement training undertaken. Other *Blades* exist in South Los Angeles on Figueroa Street and in Santa Ana on Harbor Boulevard. *Blades* serve as local ‘sex tourism’ spots for johns and can become well known ‘go to spots’ for them to frequent. Once the south Claremont budget hotels (which are readily freeway on and off accessible) become inexorably associated with the *Blade* on Holt Ave, it will become increasingly difficult to decouple this association once the ‘street reputation’ is solidified.

[15] Steven Felschundneff, “Killing brings urgent focus on Claremont area motel crime.” *The Claremont Courier*. 21 July 2022, <https://claremont-courier.com/latest-news/killing-brings-urgent-focus-on-claremont-area-motel-crime-66914/>. Also refer to Note 16 following.

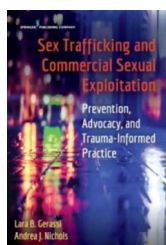
[16] The ad hoc committee is composed of Caleb Mason, Becky Margiotta, and Frank Bedoya. Documentation and a statement of direction related to initial efforts of this committee can be found at: “Claremont Police Meeting Agendas.” 3 March 2022-7 April 2022, <https://www.ci.claremont.ca.us/home/showpublisheddocument/18047/637843224068770000>. Also see the Image 7 (Sequence) in this research note. Discussion leading to the formation of this ad hoc committee can be found in the ‘Prostitution Enforcement (Oral Report)’ section of “Claremont Police Meeting Agenda.” 4 November 2021, <https://www.ci.claremont.ca.us/home/showpublisheddocument/17413/637732791210779922>.

[17] The City of Pomona, for instance, utilized a ‘public naming and shaming’ approach for a multi-month period in late 2020 and early 2021—though the deterrence value of this approach is unknown. As an example, see “Sex Purchaser Report.” Pomona Police Department. Form Date: 11/10/2020; Report Date: 3/16/2021, <https://www.pomonaca.gov/home/showpublisheddocument/2690>. About seven reports are listed on the city website; <https://www.pomonaca.gov/business/search?q=sex%20purchaser%20report>. They portray the regional draw of the Holt *Blade*. The entries also contain many 2021 arrest locations which help to define the *Blade*’s geographic expanse.

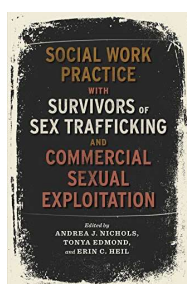
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## Biography

**Dr. Robert J. Bunker** is the director of research and analysis and a managing partner at C/O Futures, LLC. An international security and counterterrorism professional, he was Futurist in Residence at the Behavioral Science Unit (BSU) at the Federal Bureau of Investigation (FBI) Academy in Quantico, VA, and Minerva Chair at the Strategic Studies Institute (SSI) of the U.S. Army War College, Carlisle, PA. Past law enforcement and military response protocol development has included counter-terrorist, counter-gang, and counter-cartel focuses. He can be reached at [docbunker@cofutures.net](mailto:docbunker@cofutures.net).

**Mae Key-Ketter** is a junior at the University of Redlands majoring in political science and an intern with *Small Wars Journal-El Centro*. Her interests include political issues affecting the progress of women globally and domestic criminal law. She is a Gold Award Girl Scout and attended the United Nations 63rd Session on the Commission on the Status of Women, New York, NY in March 2019. She is a past C/O Futures, LLC intern whose research focus was on [Bloods and Crips migrating to Belize](#).

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## Shelley Desautels

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**From:** Ginger Elliott <[REDACTED]>

**Sent:** Tuesday, November 29, 2022 10:44 AM

**To:** Katie Wand <[kwand@ci.claremont.ca.us](mailto:kwand@ci.claremont.ca.us)>

**Subject:** Meeting on Motels:

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

As a member of Safe and Healthy Housing is walked the “nuisance” motels this past month. Even on such cursory review it is clear there is a major problem there. Pleas review the Long Beach ordinance for particular ways to address this issue. The 3.0 proposal doesn’t do the job.

Ginger Elliott

Sent from [Mail](#) for Windows

## Shelley Desautels

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**Subject:** FW: Hotel malfeasance in south Claremont

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**From:** John Engelke <[REDACTED]>  
**Sent:** Tuesday, November 29, 2022 12:38 PM  
**To:** Katie Wand <[kwand@ci.claremont.ca.us](mailto:kwand@ci.claremont.ca.us)>  
**Cc:** Jim Keith <[REDACTED]>  
**Subject:** Re: Hotel malfeasance in south Claremont

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Hello Ms. Wand,

As an addendum to my previous letter, I wanted to point out that Monrovia, as well as other local cities, has successfully leveraged suggestions included here. Starting in the mid-1970s, Monrovia enjoyed a stunning track record of redevelopment success. They were so successful, in fact, that the city was able to finish redeveloping one part of town and then moved on to different areas. The efforts turned around a street notorious for rundown hotels, drug dealing and liquor stores into a stunning technology and business corridor backed by malls, shops and nearby residential development. South Claremont needs redevelopment focus.

The California Planning and Development Report (<https://www.cp-dr.com/articles/node-1945>) and the Los Angeles Times' "Monrovia Makes the Most of Redevelopment Tools" (<https://www.latimes.com/archives/la-xpm-1988-06-12-re-7002-story.html>) discuss how Monrovia rebuilt areas in malaise through an aggressive, multi-pronged approach that included police action, standards enforcement and shuttering illicit businesses while simultaneously encouraging new land use. Over the years the city has even leveraged investments to purchase property temporarily and demolish offending structures or alternately engaged eminent domain to take them over. Similarly, the city of Baldwin Park closed a crime-plagued hotel (<https://www.latimes.com/archives/la-xpm-1993-06-17-ga-4201-story.html>) through a series of coordinated police and city code enforcement action.

These articles from a few years ago remain meaningful simply because the state of problems is directly comparable. The low-budget and rundown hotels match the articles' subjects to a tee -- prostitution, rampant illegal drug vending and resultant social abuse is occurring right now in our midst, in front of our eyes. Given a plan of completely appropriate enforcement action, these examples become a guide that effective measures will get the criminal element out of south Claremont and reverse the structural decay quite decisively.

**Where can we start?** Tear down the abandoned, blighted old Greyhound Bus Terminal at Indian Hill and West American Avenue. Then, we must proceed with documenting illicit activities at the nearby Motel 6, Knight's Inn and Claremont Lodge. These establishments must comply or the city should step in to close them permanently. Coupled with some redevelopment foresight, south Claremont may be drastically improved.

Best Regards,

John Engelke

On Mon, Nov 28, 2022 at 8:33 PM John Engelke <[john.engelke@gmail.com](mailto:john.engelke@gmail.com)> wrote:

Hello Ms. Wand,

Unfortunately I cannot make it personally to the Community Listening Session on Motels and Hotels Tuesday evening but instead I request that my comments here be shared and entered into the record:

My property is no more than 2/3 mile from the cluster of low budget motels in south Claremont. I have witnessed all kinds of malfeasance at these businesses over the years, including an open-air market for drugs and prostitution. It did not have to be like this -- I've lived in Claremont my whole life and do recall a splendid Howard Johnson's and Rodeway Inn. Unfortunately, a malaise has apparently set in to city planning oversight over the past 10 years that allowed the economic and social plight of neighborhoods outside the city to creep into Claremont.

I urge everyone to read architectural and civic historian Mike Davis' analysis on suburban decay, "[Ozzie and Harriet in Hell: On the Decline of Inner Suburbs](#)". It's an insightful treatise on misperceptions, misplaced investments, poor civic management and racial inequities in the mismanagement of the City of Pomona. (The caveat is that this is an older article but it seems neighbors' mistakes from the past may be repeated.) **Spoiler:** Cities go to hell as a result of structural decay, poor civic planning and oversight. This mismanagement is in large part a contributing factor to misperceptions and entrenched racial inequity in contemporary society.

It's critical that Claremont not fall into this trap. Neighborhoods, communities and cities are what we make of them and in large a reflection of the support we afford them as community managers. I posit that south Claremont has been mismanaged, or perhaps in large part written off, and I ask the city to renew its focus on improving oversight of the businesses, architecture and city-provided services in the area.

There are a number of approaches, but it seems clear some sort of enforcement needs to be immediate:

1. Strict enforcement of health and occupancy laws, including an anti-prostitution/trafficking task force and an ordinance to shut down offending facilities that host illegal activities.
2. Renewed focus on documenting and recording violations at these hotels for posterity and enforcement actions.
3. Basic laws to limit misuse of the hotels as long-term rental properties, effectively flop houses.

Also, it seems the city can do a lot to change the trajectory of the neighborhood. Some actions may be undertaken to improve amenities to encourage different uses of the area:

1. Improve traffic by widening the underpass at Indian Hill. The road is narrow, constricting and creates gridlock, which makes the area less desirable and normatively isolated from other parts of the city.
2. Rezone some of the hotel locations for other purposes. We do not need low-budget hotels specializing in prostitution or flop houses in town, but moreover structural decay has set in as a malaise. These old low-budget buildings and old layouts were not set up for the test of time and must be rethought.
3. Require hotels to completely rework or remodel their exterior layout at time of ownership or business license change so that the building infrastructure is completely reworked. It will discourage low-budget proprietors from taking over run down and unmaintained facilities for illicit profiteering.
4. Consider designating the region as a revitalization zone to qualify for potential local, state and federal incentives to redevelop the properties. There could be a focus on sustainability and Green buildings.

There is a chance here to rethink the area around the 10 freeway before more damage is entrenched. With a little foresight and attention, this part of town can rid itself of the scourge brought by these facilities. In fact,



the city should have the capacity to take over properties engaging in abusive activities, and it should exercise that right as a necessity.

Please look at these suggestions as an opportunity to direct revitalization efforts to this part of town to make the entire city a wonderful place. The city must take action with haste. Refocus, re-energize and revitalize through sustained redevelopment.

Sincerely,

John Engelke

## Shelley Desautels

---

**Subject:** FW: Hotel malfeasance in south Claremont

**From:** John Engelke <[REDACTED]>

**Sent:** Monday, November 28, 2022 8:33 PM

**To:** Katie Wand <[kwand@ci.claremont.ca.us](mailto:kwand@ci.claremont.ca.us)>

**Cc:** Jim Keith <[REDACTED]>

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Sincerely,

John Engelke

## Shelley Desautels

---

**Subject:** FW: COMMENTS TO THE LISTENING SESSION: HOTEL/MOTELORDINANCE

**From:** Bob Gerecke <[REDACTED]>

**Sent:** Monday, November 28, 2022 11:37 PM

**To:** Katie Wand <[kwand@ci.claremont.ca.us](mailto:kwand@ci.claremont.ca.us)>

**Cc:** Sal Medina <[smedina@ci.claremont.ca.us](mailto:smedina@ci.claremont.ca.us)>; Jim Keith <[REDACTED]>

**Subject:** COMMENTS TO THE LISTENING SESSION: HOTEL/MOTELORDINANCE

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Claremont's ordinance should be similar to a Long Beach ordinance called a "Nuisance Motel Ordinance". It sets standards and describes the process of forcing the motel to correct problems or denying them a permit to operate. It sets the stage to shut them down if they aren't managed properly, and thus far some of ours aren't.

- We all know how much prostitution we see on Indian Hill Blvd near our three motels at the I-10 freeway. 57 people demonstrated on Saturday 8/27. Prostitutes continue to be bold. One walked past the 57 people while they were protesting.
- The Courier's police blotter frequently reports drug use and drug dealing in, and on the property of, these motels.
- Motel managers know that there are traffickers/pimps, scantily-clad young women and drug buyers and sellers staying at their motels, but they continue to rent to them. Motel owners do not add them to a no-rent list, as a prior owner did.

Guest reviews for the motels show that people are shocked at the conditions. Motel owners are not managing their property in a safe and healthy condition.

There must be ordinance provisions and an additional enforcement process to ensure:

- That people staying in motels have another address. The motel cannot be their only address.
- That a person can stay in the motel for at most 60 days in a half year.
- That motel rooms must be rented for a full day/night, not a few hours of "Day Use" for less money if the room is "closely monitored" (try to enforce that!), and then re-rented.
- That photo identification is copied or that the motel clerk has to sign that he has seen a photo ID and is accountable that the person is the same.
- That members of a group which rents rooms must personally sign in.
- That motels near the freeway have permitted parking where all visitors must sign in.
- As in our current Municipal Code, that a residential motel is allowed only if the motel "is located in an area with a concentration of amenities for guests, including restaurant, retail, recreation, open space, and exercise facilities".

Motels have many homeless people living there, paying with vouchers. Recently, the Knights Inn was filled with 90% voucher residents. Voucher residents struggling with their own issues will continue to be housed

next to criminals who will prey upon them and whom bad management won't stop renting to, because they bring in money. The new ordinance must be designed to prevent prostitution and drug peddling, which will otherwise occur next to the many vulnerable voucher residents. In addition, in order to rent to voucher residents, a motel must be required to have on-site social work staff capable of providing, or linking voucher residents with, the services they need.

There must be clear steps for forcing motels to shut down if they violate our municipal code requirements. Staff must actually take these steps.

Please consider that Auto Center Drive is a major source of sales tax revenue, which our City budget really needs for our economic sustainability. What we allow at the nearby motels and thereby on the ground affects the extent to which Claremont residents and others want to patronize or avoid Auto Center Drive. Allowing prostitution and drug dealing to occur is not the way to maximize the revenue-producing potential of Auto Center Drive.

Bob Gerecke

**Memo to: Alisha Patterson**  
City Attorney, City of Claremont  
Rutan & Tucker, LLP

**From: Jim Abrams**  
Member Legal Advisor  
California Hotel & Lodging Association  
California Association of Boutique & Breakfast Inns

**Date:** September 7, 2022

**Re:** City of Claremont Proposed Hotel/Motel Ordinance (8/26/2022)

This Memo is submitted on behalf of the California Hotel & Lodging Association (CH&LA), which represents transient lodging establishments throughout the State of California, including the City of Claremont. CH&LA's membership includes, among other businesses, hotels, motels, bed and breakfast inns, resorts, spas, guest ranches, ski resorts, and vacation rentals.

CH&LA very much appreciates the fact that the City of Claremont is soliciting input from stakeholders in the lodging industry regarding the proposed hotel/motel ordinance, and that it has reached out to us to insure the proposed ordinance focuses on the actual problem the City faces and will not be illegal or restrain lodging operators from conducting their day-to-day business operations.

After reviewing the proposed ordinance, CH&LA has a number of questions, concerns, and suggestions regarding the proposed ordinance, and they are set out below.

A. Application of Proposed Ordinance to All Transient Lodging Establishments in City of Claremont

In your August 29, 2022, email to me, you explained the purpose of the proposed ordinance as follows: "In response to concerns raised by numerous members of the community, one of the priorities the City Council set this year was addressing criminal and code enforcement problems with motels near the I-10 freeway." Section 16.101.050 of the proposed ordinance imposed a number of very specific requirements for every "motel" (as defined in the proposed ordinance) "that is within one half mile (2,640 feet), measured 'as the crow flies' from outer property lines, of the on or off ramp to either the Interstate 210 Highway or the Interstate 10 Highway" .... The

provisions that apply to those particular motels are designed to address the “criminal and code enforcement problems” generated by that particular set of motels.

Unfortunately, the proposed ordinance applies to every “hotel” “motel,” and “hotel/motel” (as defined) in Claremont. In other words, the ordinance would apply to and regulate every transient lodging establishment in the City. While some of the provisions of the proposed ordinance should apply to all transient lodging establishments, there are other provisions in the proposed ordinance that should logically apply only to the problem motels specifically identified in Section 16.101.050, and not to all other transient lodging establishments.

CH&LA respectfully submits that a substantial number of the provisions in the proposed ordinance should apply to the motels identified in Section 16.101.050 but not to all of the other transient lodging establishments in Claremont.

B. Section 16.101.435 – Definition of Hotel

Is it intended to include reservation platforms such as Airbnb and VRBO in this definition?

C. Sections 16.900.435, 16.101.010, and 16.101.060 – Long-Term Stay Business Hotels

Section 16.101.010 defines a long-term stay business hotel as one “that allows guests to rent rooms primarily to business travelers for terms that exceed the maximum length of stay limitations in this chapter.”

CH&LA is having difficulty identifying exactly what type of lodging establishments this covers. Are they extended-stay hotels, such as Extended Stay America, Residence Inn by Marriott Hotels, and TownPlace Suites by Marriott, which typically provide the types of amenities specified in Sections 16.101.060 D, E, and F, or are they something different? Are they only for business travelers, or can anyone stay there?

We assume that there is one or more such hotels in Claremont. Could you please identify them for us so that we can determine what type of establishments these are make comments as appropriate?

D. Section 16.101.020 B – Maximum Length of Stay

Section 16.101.020 B states: "All guest rooms shall be used only for short-term, overnight accommodations for transients whose guest stays at such hotel/motel are thirty (30) consecutive calendar days or less, and sixty (60) cumulative days or less in any one hundred and eighty (180)-consecutive-day period." We assume that the purpose of these time limits is to avoid having guests become permanent residents and/or is directed to the motels specified in Section 16.101.050, and we submit that it should not apply to all other transient lodging establishments in Claremont

It is common in the lodging industry for many hotel and motel guests to want to stay more than 30 days. Their reasons are completely legitimate, and this is very good business for lodging establishments. This provision will cause those guests to leave after 30 days, thereby costing the hotels valuable business, and frustrating the guests' travel plans.

In addition, there are "full-service" hotels that sometimes rent rooms to long-term guests who stay there on an indefinite basis that might exceed the time limits specified above. These individuals always remain "guests," who can be summarily evicted, and do not become "tenants" due to the passage of time. Civil Code Sections 1940(a), (b)(2).

For these reasons, this particular provision should be made applicable only to motels defined in Section 16.101.050.

E. Section 16.101.020 C – Agreement to Stay No More than 30 days

This particular provision is inappropriate, onerous, and impracticable, and it should be repealed or made to apply solely to motels identified in Section 16.101.050.

As with Section 16.101.020 B, it appears that this subsection is directed toward making sure lodging establishments, especially problem motels, do allow not let anyone become a permanent resident or let people stay for long periods of time, thereby promoting criminal behavior. This is another provision in the proposed ordinance that is appropriate to motels identified in Section 16.010.050, but it should not be applied to all other transient lodging establishments.

In today's lodging industry, a great many individuals check in to a hotel online, using a kiosk, or via a mobile device, and, in some cases, they can go to their rooms without ever having to go to the "front desk."



(<https://www.cvent.com/en/blog/hospitality/hotel-mobile-check-in> <https://help.marriott.com/s/article/Article-22236> ). This particular provision in the proposed ordinance would defeat the purpose of this technology and make hotel operations more difficult, while frustrating guests' preferences.

In addition, there are many hotel and motel guests who want to stay more than 30 days. This provision will cause those guests to leave after 30 days, thereby costing the hotels valuable business, and frustrating the guests' travel plans.

Moreover, this provision is impracticable from the standpoint of hotel operations. Making every single guest come to the front desk and sign a written agreement is going to be very inefficient and onerous from the standpoint of hotel operations, and many guests are simply going to refuse to sign the agreement. This is going to cause unpleasant incidents at the front desk, which no one wants.

Lastly, this provision (i.e., maximum of 30 days) conflicts with the time limits in Section 16.101.020 B, which allow stays of up to 60 days.

F. Section 16.101.020 D – Long-Term Stay Business Hotels

As discussed in Section B of this memo, CH&LA does not know what is included in the definition of long-term business hotels. We are concerned that this might include a number of brands of extended stay hotels, as well, possibly, as other types of establishments. We are therefore unable to determine what the impact of this particular provision might have on the lodging industry. Once we have a clearer understanding of what type(s) of lodging properties constitute long-term stay business hotels, we will offer comments as appropriate.

G. Section 16.101.030 – Minimum Length of Stay

This provision provides, in part: "The minimum rental term for a guest room in a hotel/motel must be sufficient for one overnight stay. No operator of any hotel/motel shall, let, lease, or rent any guest room more than once in any 18-hour period." This provision may be appropriate for the motels identified in Section 16.101.050, but it is certainly not appropriate for all other transient lodging establishments. There are legitimate reasons why it is inappropriate to require a hotel to rent a room for a minimum of one overnight stay.

For example, there are situations where a guest might check in to a hotel, be disappointed with their accommodations, and want to leave and go to

another property for whatever reason. This is not because the hotel is renting by the hour or doing anything unlawful, but because the guest might be disappointed or perhaps, they discover a maintenance issue. If the hotel lets someone out of the reservation and it's early enough in the afternoon for the hotel to clean it and fix the maintenance problem, then the hotel will re-rent it, because the hotel will otherwise have to credit the revenue back to the guest who departed. If the hotel can re-rent the room, it is gaining a business advantage.

In addition, there are situations where an individual legitimately needs a room for only a short period of time. For example, hotels, especially near airports, have travelers who have long layovers and want a place to rest and freshen up. They will use the room for only a few hours and the hotel will charge only for a partial day. (This is pertinent to Section 16.101.040 B ("No operator of a hotel/motel shall accept an hourly rate or any increment less than the rate for a full day's room rental."), discussed in Section I of this Memo.)

Furthermore, the prohibition against renting a guest room more than once in any 18-hour period, is perhaps appropriate for problem motels, but it is not appropriate for all other lodging establishments. What if a guest requests an early check-in or a late checkout? This provision is too restrictive for legitimate hotel operators and be reserved for properties that renting for unlawful purposes.

For these reasons, this particular provision should be deleted or made applicable solely to motels identified in Section 16.102.050.

#### H. Section 16.101.040 A – Kitchens

Many legitimate lodging establishments have accommodations that include kitchens. What is the rationale for this prohibition? Are there hotels or motels in Claremont that have kitchens? If so, what type of establishments are they? If that is the case, this provision should be deleted or made to apply solely to motels identified in Section 16.101.050.

#### I. Section 16.101.040 B – Room Rental Rates

Among other things, the provision requires that room rental rates "shall be charged by the day," and no "weekly or monthly room rental rates shall be offered." This is contrary to the business practices of many transient lodging establishments. For example, hotels offer "package" deals, such as Super Bowl weekend and New Year's Eve that include stays for multiple nights. These packages are priced accordingly. In addition, it is common practice

for extended-stay properties to charge by the week or the month. Here again, it appears that this particular provision is meant to apply to problem motels, and not to all of the other hotels and motels in Claremont.

In addition, many hotels very much try to incentivize guests to stay “a little bit longer” (e.g., by running promotions throughout the year), and seven-day stays are great business for them. Hotels offer weekly rates to make these longer stays more attractive.

Moreover, this subsection prohibits a hotel from accepting “an hourly rate or any increment less than the rate for a full day’s room rental.” This prohibition conflicts with common lodging industry practice, as explained in Section G of this Memo.

Therefore, this provision should be deleted or made to apply solely to those motels identified in Section 16.010.050.

J. Section 16.101.040 E 1.e. – Copying/Scanning Documents with Personal Guest Information

Paragraph 1.e. of this subsection requires lodging operators to maintain a “photograph or scanned image of the identification documents of each guest” in its guest register. Due to privacy and other concerns, this particular requirement is very problematic, it is contrary to California law, and it opens lodging operators to substantial legal liability.

In order to address these privacy-related concerns, the common mantra in the lodging industry, and with businesses generally, is to (1) obtain the minimum amount of “personal information” necessary, (2) keep it for the shortest time possible, and (3) keep all such information as confidential as possible by maintaining “reasonable security procedures and practices.”

California law requires organizations to implement reasonable security procedures and practices to protect personal information from unauthorized access, destruction, use, modification, or disclosure. California Civil Code Section 1798.81.5(b) makes this requirement mandatory (“A business that owns, licenses, or maintains personal information about a California resident shall implement and maintain reasonable security procedures and practices appropriate to the nature of the information, to protect the personal information from unauthorized access, destruction, use, modification, or disclosure.”)

In 2016, the then California Attorney General issued a California Data Breach Report (<https://oag.ca.gov/sites/all/files/agweb/pdfs/dbr/2016-data->

[breach-report.pdf](#)). The first recommendation in the Executive Summary of the California Data Breach Report states; “The 20 controls in the Center for Internet Security’s Critical Security Controls identify a minimum level of information security that all organizations that collect or maintain personal information should meet. The failure to implement all the Controls that apply to [a business] organization’s environment constitutes a lack of reasonable security.” (Emphasis added.)

CIS Critical Security Control 3: Data Protection states that businesses must “[d]evelop processes and technical controls to identify, classify, securely handle, retain, and dispose of data.”  
(<https://www.cisecurity.org/controls/data-protection>)

The requirement in paragraph 1.e. of Section 16.101.040 to copy/scan documents with “personal information” – coupled with the requirement to keep that information for four years as specified by Section 16.101.040 E3 of the proposed ordinance – violates the statutory mandate in Civil Code Section 1798.81.5 and is antithetical to sound business privacy practice. Therefore, it must be deleted.

K. Section 16.101.040 E.1.g – Attestation

Making a hotel employee execute an attestation in the guest register regarding every guest who checks in every day is terribly onerous and unnecessary in most cases. This is another provision in the proposed ordinance that should be deleted or made to apply solely to those motels identified in Section 16.010.050.

L. Section 16.101.040 E2 -- Copying/Scanning Documents with Personal Guest Information

See discussion in Section J of this Memo.

M. Section 16.101.040 E3 – Maintenance of Guest Register

Four years is an unreasonably long period of time to require a lodging establishment to keep all of this information. It is typical for local jurisdictions to require that such records be maintained for only 90 days. See, for example, City of Los Angeles Municipal Code Section 41.49(a). ([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-128922](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-128922).)

In addition, CH&LA is uncertain what type of audit is being referred to in this paragraph. Is it an audit to confirm compliance with the proposed ordinance, or is it some other type of audit?

N. Section 16.010.040 E4 – Inspection of Records by City or Its Agents

Requiring a lodging establishment to turn over such material without a warrant is unconstitutional. *City of Los Angeles v. Patel*, 576 U.S 409 (2015).

O. Section 16.101.040 E5 – Inspection of Records, Etc. by Claremont Police Department

See comment in Section N of this Memo.

P. Sections 16.101.040 G, H, I, J – Guest Room Standards

Have violations of these standards been a problem in all transient lodging establishments in Claremont, or only in certain establishments?

CH&LA submits that there are important incentives for most transient lodging establishments to meet those requirements. Among other things, the traveling public and market forces will demand that lodging facilities to meet the requirements identified above in Sections 16.101.040 G, H, I, and J. For example, the American Automobile Association publishes Tour Books and other materials that recommend lodging establishments for, and AAA retains inspectors who are trained to inspect and recommend the specific properties to include in those publications.

If problems of this type are typically encountered only in certain properties, these standards should be limited to them.

Q. Section 16.101.040 H7 – Emergency Telephone Access

It should be noted that a majority of guests now carry mobile phones and can use them to make emergency calls. Also, CH&LA submits that this subsection is ambiguous in that it could arguably require an emergency telephone system over and above phones located in guest rooms. To clear up this ambiguity, CH&LA submits that this subsection be amended as follows:

Emergency Telephone Access. Guests shall have twenty-four (24) hour emergency access to a telephone (telephones located in guest rooms or a

payphone is are adequate) on the property. However, such a public telephone shall not be made generally available to the public so as to become a public nuisance.

R. Section 16.101.040 I5 – Landscaping

This subsection requires that all “areas on the property designated for landscaping, i.e., lawns, planter beds, and other unsurfaced locations, shall be maintained with properly trimmed living plant materials.... (Emphasis added.) Given current and anticipated drought conditions and local jurisdiction edicts, many hotels have done away with lawns, and other living plants. Therefore, this particular subsection should be deleted.

S. Section 16.101.060 – Long-Term Stay Business Hotels

See the comments in Sections C and F of this Memo.

T. Section 16.101.070 -- Amortization of Legal Nonconforming Conditions

This section requires that changes required/prohibited by the proposed ordinance pertaining to hotel/motel operations “take effect immediately (we assume that means as of the “effective date”). Is the effective date of the ordinance going to be the date that it is adopted by the City Council, or is the effective date going to be some date in the future after adoption by the City Council? If it is the former, and because changes in hotel/motel operations will take some time to implement, CH&LA submits that a reasonable implementation period be allowed.

CH&LA very much appreciates the opportunity to provide this input, and we look forward to continuing to work with the City of Claremont and its City Attorney to refine the proposed ordinance.



## Nhi Atienza

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**From:** Jeralyn Klasik [REDACTED]  
**Sent:** Friday, September 30, 2022 3:06 PM  
**To:** Nhi Atienza  
**Subject:** Item #2: Hotel/Motel Ordinance on October 4, 2022 agenda  
**Attachments:** Motel 6 reviews 2022.docx; Lodge reviews 2022.docx

**Follow Up Flag:** Follow up  
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Planning Commissioners:

Attached you will find the most recent 2022 guest reviews of Claremont's Motel 6 and Claremont Lodge. Knight's Inn was not included because there were no online reviews more recent than 2021. The reviews are listed in the order of most recent first. I think you will find that the reviews with comments are the most interesting and that it doesn't take long to sift through these and get a taste for what guests are saying about the freeway motels.

The ordinance, in singling out the freeway motels, seems to be holding them to higher safety standards than what these guests have experienced in the past. I hope that the Commission will clarify the range of enforcement options in Section 16.101.080 in Version 2. The new safer standard need to be enforced, so this ordinance needs to have some real teeth in it.

Jerry Klasik



## 2022 MOTEL 6 REVIEWS

### TripAdvisor 14 reviews 1.5/5

[Susanna B](#) wrote a review Apr 2022

#### [Bad beyond words](#)

Room was filthy and wreaked of smoke and stench. Floors dirty and sticky, bed linens smelled like a nightclub and prostitutes walk the parking lot at night.....Not safe, not clean, and totally disgusting. If the city gave a crap, I probably would have called the Health Department.

Date of stay: April 2022

[Explorer258374](#) wrote a review Apr 2022

#### [It's a dump](#)

As soon as we walked up the rugged(must have been installed over 2 decades ago) staircase to the 2nd floor we knew immediately it's a dump. Entered the room and beyond a doubt it is in fact a dump. Avoid this facility until it has gone thru a decent renovations.

### YELP | 2 out of 5 stars in 40 reviews

[Samus M.](#)

5/22/2022

Apparently changing HDMI on the TV's is against policy. It's impossible. Terrible customer service. Employees will waste your time running in circles with you hoping the problem goes away. Manager doesn't have any manners and will rudely tell you nothing can be done, it doesn't constitute a refund and go back to your room. I will not be returning or recommending. Ever.

[S B.](#)

4/12/2022

Absolutely filthy, neglected and dangerous.

Prostitutes and sketchy people in the parking lot....

Rooms absolutely reek of cigarette/pot smoke (even though our room was a "non smoking" room.

Very sad as this used to be a nice hotel. They literally don't care about cleanliness, customer safety OR a good night rest. It should be condemned by the health dept., as the balcony looks

like it could collapse at any moment.  
GROSS!!!

Michael E.  
4/11/2022

I checked into the hotel in the daylight and the hotel seemed dirty and sketchy. When we got into the room, it smelled like very strong chemical deodorizer. Almost choking. We aired it out and went to dinner. Came back at night and saw two nearly naked prostitutes walking near our room, and a room that looked like they lived there. There were parties in cars that spilled into rooms of dangerous looking people.

We left. the line was too long to check out in the lobby, and it felt unsafe waiting, and the phone went unanswered when I tried to call to check out.

I have stayed at many Motel 6's and 95% of them have been clean and good values. One other time it was dirty, but not dangerous. Please read other reviews of this hotel and you will see that others agree that it is dangerous and dirty. I would remove them from Motel 6 brand association as it is a terrible place.

[Alex C.](#)  
Pomona, CA  
3/6/2022  
[1 photo](#)

This place is disgusting the manager is rude and we found underwear in our sheets this place is nasty asf don't come here the employees are nasty asf



Nasty ass underwear



## **Booking.com First 3 pages back through June 2022**

**6.4/10 in 334 reviews**

*Anonymous* 🇺🇸 United States of America · September 2022 · Family


**Very Poor**

Stephanie 🇺🇸 United States of America · September 2022 · Family


**Won't be back until its cleared out**

Liked · the location. lots of restaurants near. right off fwy. had a fridge and microwave

Disliked · waaaaaaaaaaaaayyyyyyy tooooooooo much illegal activity going on there. All hours of the night especially on weekends. Not a family place I was scared to let my kids go outside. Paid way to much for a facility with all that going on right outside and there was no notice of pool being not only open but that there wasn't even water in it.

Valencia  United States of America · September 2022 Family

**Very Good**

Valencia  United States of America · September 2022 Family

**Very Good**

•

John  United States of America · August 2022 Solo traveler

**Exceptional**

•

Valencia  United States of Americas · September 2022 Couple

**Good**

•

Ahmed  Saudi Arabia · September 2022 Solo traveler

**pleasent experience**

Liked · perfect location it was in the centre and close to all places I need. My room was clean and quiet. of course at weekends the area got noisy sometimes with all these loud cars and motor cycles but every thing is good. I like the staff especially the guy in the mornings times.

Disliked · A/C sometimes loud

Nancy  United States of America · August 2022 Solo traveler

**acceptable**

Rodriguez  United States of America · July 2022 2 Solo traveler

**Very Good**

lemens  Austria · August 2022 Family

**Good**

Latoya  United States of America · July 2022 Solo


**Exceptional**

Dina  Mexico · July 2022 Family

**Disappointing**

Liked · -

Disliked · The room smelled a lot of marijuana, horrible stay, not recommended if you go with your family, and we only went to sleep to leave very early, but it was impossible to rest.

Javier  Spain · July 2022 Couple

**Good**

Liked · the bed and the location

Disliked · the environment and the environment

Steven  United States of America · July 2022 Solo traveler

**nice room I'll rerun**

Liked · room was large private separate restroom area

Disliked · i work from home and took my laptop for work and couldn't connect to the tv couldn't cast or do anything on the tv why would this be blocked why would they care if we plug in our devices to the tv ?

*Muraira* 🇲🇽 Mexico · May 2022 Solo traveler

### **Disappointing**

*Larrica* 🇺🇸 United States of America · July 2022 Couple

### **Fair**

*Lisa* 🇺🇸 United States of America · July 2022 Couple

### **Good location and clean**

Liked · close to freeway

Disliked · none

*Chanchanok* 🇺🇸 United States of America · May 2022 Group

Reviewed: July 7, 2022

### **Fair**

*Liz* 🇺🇸 United States of America July 2022 Family

### **Very Poor**

Liked · Location is good. Exit from freeway. There are lots of food options nearby., even walking distance from hotel.

Disliked · Pool and jacuzzi unavailable!!! They DO NOT have NON-SMOKING Rooms. All rooms are stinky to cigarettes and drugs!!!! This is unacceptable to spend time with family!!!! NEVER BOOK AT MOTEL 6 CLAREMONT!!!!!!

*John* 🇺🇸 United States of America · July 2022 Group

### **Exceptional**

10

*Tina* 🇺🇸 United States of America · July 2022 Couple

Reviewed: July 3, 2022

### **Wonderful**

*Javier* 🇺🇸 United States of America · June 2022 Family

Reviewed: June 30, 2022

### **Bad**

•

Anonymous 🇺🇸 United States of America · June 2022 Family

### **Very Poor**

•

*Rodriguez* 🇺🇸 United States of America · June 2022 Solo traveler

### **Exceptional**

*Luis* 🇺🇸 United States of America · June 2022 Family

### **Be honest what you offer!**

Liked · No pool when stated pool and spa, It's smelled like cigarettes in a non-smoking room.  
Homeless people kept trying to open my door all night


Disliked · Better security Smell the rooms before renting them out

*Douglas* 🇺🇸 United States of America · June 2022 Group

## Exceptional

Liked · No

Disliked · No pool no spa both drained fix the pool guys

*Nita*  United States of America 1 night · June 2022 Couple Reviewed: June 9, 2022

**convenient to our visiting friends but will not stay again in this facility. a baseline is good repairs and cleanliness.**


Liked · looked good from exterior

Disliked · minimal furniture...no bureau, needs upkeep repairs big time in bathroom, Covid used as excuse for no shampoo or Kleenex, toweling is thin, kept thinking roaches were going to come out of bathroom, coffee splatter on bathroom door, no coffee/tea service or ice bucket provided. paid over \$100 for this night.

•

*Anonymous*  United States of America 1 night · June 2022 Family Reviewed: June 6, 2022

## Bad

*Wendy*  United States of America 1 night · June 2022 Family Reviewed: June 4, 2022

## Exceptional



## 2022 CLAREMONT LODGE REVIEWS

**TripAdvisor – No reviews**

**Yelp 29 reviews in all 2.5/5 stars**

Kinya R Glendora, CA 9/18/2022

One word. Prostitution. Claremont should close this trash down. It's unsettling / disgusting watching young girls get dropped off here to "work". The fact that Yelp is threatening my speech is also concerning. The owners of this business know the crime going in here.

[Teresa A.](#) San Francisco, CA 8/14/2022

Do not stay here it was so bad.. on one of the beds there was blood on the sheets in the room... I went to the front desk because the phone in our room did not even work... the front desk went and handed us sheets and told me to change it my self. The floors in our room was so dirty that our socks where black .. the towels in the bath room where nasty ... they had blood stains on them .. then to top it off here was people out side our room like at 3 in the morning doing drugs ... for 160 I will never stay here again .. do not waste your money here...

[Max S.](#) Orange, CA 5/2/2022

Dropped my cousin off to stay here while they was in town for a conference at their local college. It was a little hole-in-the-wall-y for our tastes. It looks like something out of a scary movie!

[theory p.](#) Claremont, CA 4/30/2022

I came here for a four day trip into Claremont and not a single night went by where I didn't have to go down to the office and get my card Reset to gain entry into the room I paid for. Every single day I had to go to the office and reset my card. I was without my cell phone for multiple days yet "cellphones" were constantly presented as the reason for the card failure. I complained about this multiple times and there was ZERO attempt to rectify or compensate this problem. Absolute nonchalance was the response. This is to say nothing of the sketchy online booking service which is a financial joke. Service is poor. But the room is a room and it is comfortable. Have a good time if you can

[Nidya M H.](#) Chino Hills, CA 3/28/2022


I just stay there for one day!!! Everything seem quite about alright!! But at check out time i was asked at door to pay for my extra time after 11am i was asked for a \$10 dollar fee not only was i brived but also threaten that if i didnt pay the fee i was not gonna be ever aloud to comeback!! And according to Frankie front desk guy!! The man briving me was their general manager!!

chairs - although no "lounge" sort of chairs. The bed was comfortable, and I liked the wood headboard behind it. All the standard room basics with a simple (and not tacky) layout.

Parking lot was directly in front of the lodge - appreciate being able to see my car from the room. On the other side of the parking lot is a really good Thai restaurant and a liquor store. They have a very tiny pool with some odd warning signs, which we had no time to use.


For an easy. convenient lodge - which is definitely what it is - it does the trick. Giving an extra star because I really appreciated all the interactions with the staff!

## Booking.com 181 reviews in all 8.1/10 points

*Mckinney*  United States of America 1 night · September 2022 Couple

### Exceptional


•

*John*  United States of America 1 night · August 2022 Couple

### Fair


Liked · Convenient area. reservation available

Disliked · Air conditioning noisy, pillows flat, toilet and tub blocked, vagrants roaming around, unsafe, no breakfast.

*Gavin*  United States of America 2 nights · August 2022 Couple

### Very Good


•

*Alex*  United States of America 2 nights · August 2022 Solo traveler

### Wonderful


Liked · clean and comfortable

• •


*Amira*  United States of America 1 night · July 2022 Solo traveler

**Exceptional**

•

*Anne*  Germany 1 night · July 2022 Family

**Disappointing**


*Karen*  United States of America 1 night · April 2022 Family

Reviewed: July 6, 2022

**Good**

*Christopher*  United States of America 1 night · April 2022 Family


**Good**

*Yujun*  United States of America 1 night · June 2022 Solo traveler

**Exceptional**

*Mike*  United States of America 1 night · June 2022 Reviewed: June 8, 2022

**Very Good**

*Eugene*  United States of America 1 night · April 2022 Family Reviewed: May 5, 2022

**Good, basic motel with plenty of parking. Close to freeway so that is good and bad. Slightly noisy.**


Liked · Staff was friendly and nice. This is a standard issue motel next to the freeway.

*Davis*  United States of America · 1 night · April 2022 Solo traveler Reviewed: May 2, 2022

**As an elderly woman traveling alone, I did not feel safe and would not stay here again.**

Liked · Quiet. Close to the freeway. Close to good Thai restaurant and Starbucks.

Disliked · Did not like the location. Did not feel safe. Walking back from dinner, 4 police cars were in the parking lot.

*Ondřej*  Czech Republic · 3 nights · April 2022 Solo traveler

**Relatively comfortable accommodation at an affordable price.**

*Mary*  United States of America Reviewed: April 16, 2022

**Short stay in April**

Liked · Convenient to the bus and my cousin nearby. A few restaurants nearby if you don't want to go Claremont Village. Two convenience stores within walking distance.

Disliked · Sorry that this hotel is not using your site anymore.

*Max*  United States of America Reviewed: April 11, 2022


**Pleasant**

*Aloha*  United States of America · 1 night · March 2022 Family Reviewed: March 20, 2022


**Will not stay here again.**

Liked · Did not eat.

Disliked · Not clean as mentioned in previous customer reviews.

*Muneer*  United Arab Emirates 4 nights · March 2022 Solo traveler Reviewed: March 11, 2022

**Very Good**

*Anita*  United States of America 1 night · February 2022

**We were happy with the price and cleanliness of the room.**

Liked · We were greeted warmly by staff and were able to check in early. Very happy with the cleanliness of our room and cleaning service the next day.

Disliked · My side of the bed was very comfortable but my husband's side was not. The hotel was full and the other occupants were a little loud.

## Nhi Atienza

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**From:** Nhi Atienza  
**Sent:** Monday, October 3, 2022 10:47 AM  
**To:** Nhi Atienza  
**Subject:** FW: CH&LA Comments to Proposed Claremont Hotel/Motel Ordinance  
**Attachments:** Comments to Claremont Planning Commission.pdf

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**From:** Jim Abrams [REDACTED]  
**Sent:** Saturday, October 1, 2022 2:05 PM  
**To:** Patterson, Alisha <[APatterson@rutan.com](mailto:APatterson@rutan.com)>; Katie Wand <[kwand@ci.claremont.ca.us](mailto:kwand@ci.claremont.ca.us)>  
**Cc:** Tamara Mims [REDACTED]; Andrew Behnke [REDACTED]; HT HOSPITALITY [REDACTED]; Lynn Mohrfeld [REDACTED]; Sam A [REDACTED]; Frank A. Weiser [REDACTED]; YOUNG, Wesley - G6 Hospitality [REDACTED]  
**Subject:** CH&LA Comments to Proposed Claremont Hotel/Motel Ordinance

Hi, Alisha and Katie. First of all, I must say that although we have some comments and suggestions regarding the proposed ordinance, I am personally most impressed by all of the work that you and your colleagues at the city did to put together such an outstanding package!

CH&LA's comments are attached, and we very much appreciate you forwarding them to the Planning Commission.

We are all eager to see what the Planning Commission does. Regardless of the outcome, CH&LA certainly intends to collaborate with you and your colleagues, as well as the hotels and motels in Claremont, on these issues.

Thank you again for all of your most-appreciated collaboration and hard work.

Jim Abrams

## BEFORE THE CLAREMONT PLANNING COMMISSION

### Comments of the California Hotel & Lodging Association Regarding Proposed Amendments to Claremont Municipal Code Pertaining to Hotels and Motels

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These comments are submitted on behalf of the California Hotel & Lodging Association (CH&LA), which represents transient lodging establishments throughout the State of California, including properties in the City of Claremont. CH&LA's membership includes, among other transient lodging establishments, hotels, motels, bed and breakfast inns, resorts, spas, guest ranches, ski resorts, vacation rentals, and extended-stay properties.

CH&LA first wants to thank the City's staff for working so collaboratively with the lodging industry. Staff endeavored to accommodate many of the industry's concerns, and this led to the development of a more workable proposed hotel/motel ordinance.

Nonetheless, CH&LA has a number of concerns and suggestions, and they are set out in the comments below. Unless otherwise indicated, CH&LA's comments below are made with reference to "Version 2" of the proposed amendments that the Planning Commission will be considering at its October 4, 2022, public hearing.

Except as otherwise indicated below, CH&LA agrees with staff's recommendation set forth on page 2 of the Planning Commission's Agenda Report and recommends that it be adopted.

#### 1. Typographical Error

The Planning Commission's Meeting Agenda for the October 4 meeting states the following:

CONSIDER AN AMENDMENT TO THE CLAREMONT ZONING CODE (TITLE 16 TO THE CLAREMONT MUNICIPAL CODE) THAT, IF ADOPTED, WILL: (1) REPEAL SECTION 16.051.060 TITLED HOTELS/MOTELS; (2) REPLACE SECTION 16.051.060 WITH A NEW CHAPTER 16.101, ALSO TITLED HOTELS/MOTELS; AND (3) ADD NEW SECTIONS TO CHAPTER 16.900 (DEFINITIONS) PERTAINING TO HOTELS AND MOTELS (COLLECTIVELY REFERRED TO AS THE "HOTEL/MOTEL ORDINANCE"). (Emphasis added.)

However, Attachment C (Draft Planning Commission Resolution) contains slightly different language:

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CLAREMONT RECOMMENDING THE CITY COUNCIL APPROVE AMENDMENTS TO TITLE 16 OF THE CLAREMONT MUNICIPAL CODE TO: (1) REPEAL SECTION 16.051.050 TITLED "HOTELS/MOTELS"; (2) REPLACE SECTION 16.051.050 WITH A NEW CHAPTER 16.101 TITLED "HOTELS/MOTELS"; AND (3) ADD NEW SECTIONS TO CHAPTER 16.900 (DEFINITIONS) PERTAINING TO HOTELS AND MOTELS.

The references to Section 16.050.060 are the correct ones.

## 2. Section 16.101.010 – Definition of "Guest"

The proposed definition of this term is:

Guest shall mean **any person** occupying a hotel/motel room, regardless of whether they are the person who paid for the room. Guest shall not include employees and/or contractors of the hotel/motel who are occupying a guest room for work purposes, such as cleaning, maintenance, and repairs. Guest shall not include legal minors in the care or custody of a guest (e.g., a guest's children). (Emphasis added.)

As staff has appropriately pointed out in its Analysis contained in the meeting materials: "The scope of this definition is important because it will determine which individuals need to be included in the guest register (discussed [in Section 16.101.050)A1 of Version 2])."

(CH&LA wishes to note at this point that there does not appear to be any other requirement in Version 2 for a guest register. Are we correct in that regard?)

The proposed definition is problematic in that a great many hotel stays involve multiple parties, such as spouses, children, other relatives, and friends, who occupy a guest unit (e.g., in a separate bedroom in a suite, or in separate bed(s)).

City staff has attempted to address at least part of the problem by exempting "legal minors in the care or custody of a guest (e.g., a guest's children)." But this means that all of the other individuals discussed above will be included in this definition. Hence, all of these individuals will have to be included in any required guest register.

For these reasons, CH&LA respectfully submits that this definition be amended to read as follows:

Guest shall mean any person occupying a hotel/motel room, regardless of whether they are the person who paid for the room. Guest shall not include



employees and/or contractors of the hotel/motel who are occupying a guest room for work purposes, such as cleaning, maintenance, and repairs. Guest shall not include (1) legal minors in the care or custody of a guest (e.g., a guest's children); or (2) any other family members, relatives, or friends of a registered guest.

### 3. Section 16.101.040(B) – Day Use Rates

Staff's Analysis in the materials for the Planning Commission Meeting discusses day use rates as follows:

"Day Use" Rates: The Doubletree reported that its parent company (Hilton) offers a "day use" rate to business travelers, which is less than the overnight rate. This "day use" rate allows business travelers to rent a hotel room for a shorter period of time (e.g., as a workspace or a space to "freshen up") when the guest does not need overnight accommodations. Staff is wary of broadly allowing hourly room rentals, but agrees that, in narrow, closely-monitored circumstances, "day use" rates provide a benefit to the community. The "Version 2.0" Code amendments would allow "day use" rates, subject to advance written approval of the City's Community Development Director. The Director could not approve "day use" rates for any hotel or motel with a history of criminal activity, and the Director could revoke the approval if it results in criminal activities or is otherwise detrimental to the health, safety, or welfare of the community.

The first sentence of Section 16.101.040(B) reads as follows:

Notwithstanding Section 16.101.040(A), **with advance written approval of the Director**, operators may offer "day use" rates in increments less than the rate of an overnight room rental for bona fide programs of the hotel/motel, such as events, conferences, and day use work spaces for business travelers. (Emphasis added.)

Based on the reasons for the industry's practices involving day use rates, CH&LA respectfully submits that the requirement for advance written approval day use rates by the Director is unnecessary and inappropriate when applied to all hotels/motels in Claremont.

CH&LA therefore respectfully submits that (1) the highlighted language in the first sentence of this section be deleted, and (2) all of the language in this section following the first section should be deleted.

### 4. Section 16.101.040(C) – Credit Cards

This requirement appears to apply particularly (only?) to the motels covered by Section 16.101.050. Those motels will be required to obtain and view specified identification documents pursuant to Section 16.101.050A2 and,

among other things, will need to confirm that the picture on the document matches the guest. We respectfully ask whether it is necessary to also require those hotels to obtain a credit or debit card. The fact of the matter is that many people who stay at those properties don't have, or can't get, credit or debit cards, especially in these hard times. Requiring motels that collect cash to also meet this requirement will be extremely onerous, will cost them a lot of business, will be harmful to people who cannot obtain these cards, and will do little, if anything, to address the problems at issue.

Therefore, CH&LA respectfully submits that this section should be deleted.

5. Section 16.101.040F – Cleanliness

Many of the "cleanliness" standards in subsection F are vague in terms of the degree of cleanliness that is required for compliance. Is one stain on a carpet really a violation that can subject the lodging operator to penalties? If so, many of us have stayed in luxury hotels that won't meet these standards. In other words, a lodging operator must maintain a "perfect" property, which is not physically or practically possible. Thus, an inspector could find a violation at any hotel/motel at any time based on these standards. This will result in enforcement that will be so discretionary as to make it arbitrary.

For these reasons, it is essential that this subsection be amended to read as follows:

F. Cleanliness

*Except for ordinary and reasonable wear and tear, the requirements in subparagraphs 1 – 6, inclusive, below, shall apply. ...*

6. Section 16.101.040(K) – Inspections

K. Inspections. To ensure ongoing compliance with this chapter and any other federal, state, or local laws and regulations, the City of Claremont's Building and Safety Division, Planning Division (including Community Improvement), and/or Police Department (collective, "City Personnel") may require periodic inspections of a hotel/motel's premises, records (including the guest register), and/or surveillance footage. Nothing in this section shall prevent City Personnel and a hotel/motel operator from working together to schedule an inspection at a mutually agreeable date and time to minimize disruption to the hotel/motel's business and operations. (Emphasis added.)

This section permits “periodic inspections of a hotel/motel’s premises, records (including the guest register), and/or surveillance footage.” (Emphasis added.)

While Section 16.101.040(K) applies to all hotel/motel properties in Claremont, the only requirement to create and maintain a guest register is for motels regulated in Section 16.101.050. Therefore, CH&LA respectfully submits that the parenthetical phrase highlighted above be amended to read as follows: (including ~~the~~ *any required* guest register).

#### 7. Section 16.101.050A1c – Identification Documents

The definition of “identification documents” in Section 16.101.010 includes: “any one of the following documents issued by a government agency: (1) a current passport; (2) a current driver’s license; (3) a current non-driver identification card; (4) current military identification.” (Emphasis added.)

Therefore, the parenthetical phrase in this subparagraph c should be illustrative only.

CH&LA submits that this subparagraph be amended to read as follows:

The identification number from the identification document the guest used to check in (e.g., the driver’s license number) and the issuing jurisdiction (e.g., state or country) for the identification document;

#### 8. Section 16.101.050A1g – Attestation

This subsection requires a “signature of the representative of the operator who examined the identification document(s) presented and attestation that he, she, or they examined the identification document(s) and confirmed that the photograph is that of the guest.”

CH&LA has been informed by at least one of the impacted motels that its check in process is all handled with an iPad, and that the program will not let the hotel accept a guest without first examining a guest’s identification documents and confirming that the picture on the document matches the person who is registering. It is neither paratactical nor feasible to also have to get a wet signature by front desk staff.

Therefore, this requirement should be deleted.

9. Section 16.101.050A2 – “Person” versus “Guest”

The first sentence of this section reads:

No motel operator shall let, lease, or rent a guest room to any **person** without first reviewing the guest’s identification documents and recording the information listed above in the register required by this section. (Emphasis added.)

In light of the definition of “guest” in Section 16.101.010, should the word “person” instead be “guest”?

10. Section 16.101.050B – Secured Parking

This is almost certainly the most onerous and unworkable section in the proposed ordinance. Based on all of the input from the lodging industry in the process of developing a suitable hotel/motel ordinance, it appears that this particular requirement is not only highly impractical, but it will not accomplish its intended purpose. Moreover, it might well force one or more of the impacted motels to go out of business.

CH&LA fully appreciates the dilemma that the City of Claremont, along with its lodging facilities, are facing. But we submit that the provisions in this section are not the answer to the problem. Our concerns are set out below.

A. This section requires motels “to maintain physically controlled, fenced and gated access **to their parking areas.**” (Emphasis added.)

CH&LA has been informed that even if the motels in question comply with this section, *it will do little to bar access to those properties*. More specifically, even if their respective parking areas are physically controlled, fenced, and gated, people can readily gain access (i.e., from the back of Denny’s and other businesses behind the motels, and from adjacent sidewalks) without ever having to go on or through the motels’ parking areas.

In other words, this requirement will not do anything to address the problem, and in light of the fact that compliance is likely infeasible, CH&LA respectfully submits that this section should be deleted.

B. We are not sure what the words “physically controlled” mean. Does this refer to something over and above “fenced and gated access”? If so, this provision is very unclear, and this ambiguity needs to be removed.

C. This requirement assumes that it is physically and practically possible for the motels "to maintain physically controlled, fenced and gated access to their parking areas." It is CH&LA's understanding that the physical layout of the motels' parking areas will make accomplishing this requirement very difficult, as well as extremely expensive. This is especially true because by the ordinance requires that the barriers are "constructed with high quality, attractive materials that are visually compatible with surrounding properties," and it prohibits the use of chain link and barbed wire fences. This makes the entire requirement more costly and infeasible.

D. This section provides that if it is not feasible for a motel "to maintain physically controlled, fenced and gated access to their parking areas," then "motels must install and maintain electronic arms that control incoming and outgoing traffic to their parking area."

There are two problems with this particular provision:

There is no definition or guidance regarding what is "feasible." The difficulty with this is discussed in more detail in Section E, below.

Moreover, the use of electronic arms presumes that access to the rest of the parking area is somehow barred (fences or gates?) and that the electronic arm is blocking some sort of restricted opening. We are having difficulty envisioning such a situation. This is very ambiguous (even doable?), and this problem needs to be corrected.

E. This section states, in part, that the "Director may waive the secured parking requirement if he, she, or they make a finding that secured access to a motel's parking areas is either infeasible or unsafe." Unfortunately, the ordinance provides no guidance or criteria for determining when securing access is infeasible.

As noted earlier, compliance with this requirement will be very costly, time consuming, and difficult. The motels impacted have to the city that providing such secured parking could put them out of business. For the motels that will be impacted, this obligation will likely be infeasible. It is therefore very important for the ordinance to provide guidance to the Director.

To that end, CH&LA would like to suggest that language along the lines of that provided in the Americans with Disabilities Act (ADA) in connection with its requirement that existing properties engage in "readily achievable" barrier removal. Specifically, the ADA requires that public accommodations (including hotels and motels) "shall remove architectural barriers in existing

facilities, including communication barriers that are structural in nature, where such removal is readily achievable, i.e., easily accomplishable and able to be carried out without much difficulty or expense.”

The ADA states that the factors to be considered in determining whether a particular action is readily achievable include: the nature and cost of the [accessibility] action needed, the overall financial resources of the site(s) involved, and the effect of the action on the expenses and resources of the business in question.

CH&LA respectfully submits that if the requirement for secured parking is not deleted in its entirety, that the ordinance be amended to include factors such as the ones listed above as pertinent to consideration of when something is infeasible.

F. If any of the motels have to close, it will result in a significant loss of transient occupancy tax revenue (for the calendar year 2021, Motel 6 paid Claremont almost \$411,000 in TOT).

For all of the above reasons, CH&LA submits that Section 16.101.050B either be deleted entirely or, at least, amended as indicated above.

#### 11. Section 16.101.050C – Video Surveillance

Note that Version 2 designates this section as 16.101.050B.

CH&LA’s comments regarding this section are set out below.

A. CCTV systems are being required only of the motels covered by Section 16.101.050. CH&LA’s understanding is that these motels are in close proximity to a number of businesses, including a liquor store. These businesses generate a lot of the type of foot traffic that the city is trying to curb. A lot of that foot traffic is blamed on the motels. Are any of those other businesses required to have CCTV? If not, requiring them to have CCTV would go a long way toward ameliorating the issues the city is dealing with.

B. It is important to bear in mind that complete CCTV systems are very expensive. One CH&LA member hotel received quote for \$20,000 for hardware, wiring and installation plus \$15,000 annually for hosting of all of the cameras data. This was for an eleven-room property, so larger properties may require even more cameras and data retention.

For the reasons listed immediately above, CH&LA submits that compliance with this section will, at best, only be a partial solution to the problem it is designed to accomplish. In addition, installation and maintenance of such a CCTV system will be extremely costly to the motels. CH&LA therefore submits that this section should be deleted.

C. in addition, this section requires motels to maintain video footage for 90 days. Many lodging establishments retain the footage for a shorter period, such as 30 days. Storing the footage for 90 days will cost significantly more.

CH&LA submits that if the mandate to have CCTV is going to be retained in the proposed ordinance, it should be amended to read as follows:

Every operator of a motel shall install and maintain in good working order closed-circuit television (CCTV) cameras sufficient to maintain continuous visual coverage of all common areas and all parking areas. The video footage from these cameras must be maintained by the motel for a minimum of ~~ninety (90)~~ *thirty (30)* days before it is erased or overwritten. Surveillance footage must be made available to City Personnel in accordance with Section 16.101.040(K) above.

## 12. Section 16.101.070 – Amortization

Subsection B provides that the deadline for “changes that require physical improvements to the property and/or structures” is January 1, 2024. That deadline is slightly over one year from now, and we submit that some of the changes in question – such as the need to provide secured parking (if it is required) – will need more time than that. We respectfully submit that the amortization deadline for physical changes be extended to January 1, 2025.

The California Hotel & Lodging Association very much appreciates the Planning Commission’s consideration of our recommendations and comments above.

## Shelley Desautels

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**Subject:** FW: Wheeler Park Neighbors and Motel Allies -- Tuesday Night at 6:00 PM - Hughes Center Meeting Community Listening Session

Begin forwarded message:

**From:** Jim Keith <[REDACTED]>  
**Date:** November 28, 2022 at 6:49:14 PM PST  
**To:** Wheeler Park Neighbors <[REDACTED]>  
**Subject:** Wheeler Park Neighbors and Motel Allies -- Tuesday Night at 6:00 PM - Hughes Center Meeting Community Listening Session

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Please attend a community meeting to listen to information from our City staff about their work on the motels and hotels. There will then be time to ask questions about why they are ignoring our requests for urgent action on:

1. Setting up a staff investigation and enforcement team focused on any violations of the Municipal Code at our motels, including violations of health laws as well as existing limits on the duration of motel occupancy.
2. Assigning a full-time police department employee to assemble evidence that will support a legal defense against the lawsuits being threatened by Motel 6.
3. An ordinance that can result in required control of the motel parking lot if they do not correct their crime and prostitution record.
4. An ordinance that does not cancel out all limits on the number of people with homeless vouchers housed at a single motel, and without services for the homeless within.

Only persons in the audience can comment. This is a problem, since several of our active members of the Committee for Safe and Healthy Housing are sick with COVID, and cannot attend. That includes me.

Therefore, please represent our neighborhood at the meeting tomorrow. I understand it is hard to take time out of your evening, but it will mean a lot to us. We don't want the staff to come back with the same proposal and blame it on our non-participation in their outreach meeting.

Community Listening Session – Motels and Hotels  
**Tomorrow -- Tuesday, 11/29 – 6:00 PM**  
In the Padua Room at the Hughes Community  
1700 Danbury Rd., Claremont

For listening only -- <https://zoom.us/j/99199561876>

### Great News – Our Neighborhood Participation Matters!

This last Tuesday, the City Council upheld the action of the Architectural Commission to force Motel 6 to reinstate the quality of their Site and Landscape plan. The swimming pool is already filled again as the first step. Motel 6 repeatedly threatened the City with lawsuits based on vague issues. The Council stood up



unanimously to Motel 6, and our City staff and City Attorney saw that this is what the City Council wanted.

1. Jim Keith

City Email Invitation

1. Good morning:
- 2.
3. I hope that everyone had a Happy Thanksgiving. As a reminder, tomorrow at 6 p.m. we will be holding a Hotel/Motel Community Listening Session in the Padua Room at the Alexander Hughes Community Center (1700 Danbury Road, Claremont 91711).
- 4.
5. Everyone is welcome to attend. I want to again emphasize that no decisions regarding the Hotel/Motel Ordinance will be made at the Community Listening Session. The purpose of the Community Listening Session is for members of the public to ask questions and provide feedback on a proposed Hotel/Motel Ordinance, which City staff is currently working on and will present to the Police Commission and the Planning Commission at a joint meeting that will be held in 2023.
- 6.
7. Due to technical limitations, the Community Listening Session will not be a hybrid meeting where people can make comments and ask questions during the meeting via Zoom; however, there will be a “**view only**” Zoom link so that the meeting can be live streamed, and a recording of the meeting will be made available on the City’s website. Here is the **view only/live stream** link:
- 8.
9. When: Nov 29, 2022 06:00 PM Pacific Time (US and Canada)
10. Topic: Hotel/Motel Ordinance Listening Session
- 11.
12. Please click the link below to join the webinar:
13. <https://zoom.us/j/99199561876>
14. Or Telephone:
15. Dial(for higher quality, dial a number based on your current location):
16. US: +1 213 338 8477 or +1 669 900 6833
17. Webinar ID: 991 9956 1876
- 18.
19. If you are unable to attend the Community Listening Session but still want to ask a question or share your feedback, please feel free to email me that information.
- 20.
21. Thank you,
- 22.
- 23.



**Katie Wand | Assistant to the City Manager**

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**City of Claremont | Administrative Services Department**  
**City Manager’s Office**  
207 Harvard Avenue | Claremont, CA 91711  
(909) 399-5454 | [KWand@ci.claremont.ca.us](mailto:KWand@ci.claremont.ca.us)  
[www.claremontca.org](http://www.claremontca.org) | Follow Us! @CityofClaremont

24.  Please consider the environment before printing this email.

## Nhi Atienza

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**From:** Nhi Atienza  
**Sent:** Tuesday, October 4, 2022 5:04 PM  
**To:** Nhi Atienza  
**Subject:** FYI- Hotel/Motel Ordinance

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**From:** City of Claremont <[contact@ci.claremont.ca.us](mailto:contact@ci.claremont.ca.us)>  
**Sent:** Tuesday, October 04, 2022 4:44 PM  
**To:** contact <[contact@ci.claremont.ca.us](mailto:contact@ci.claremont.ca.us)>  
**Subject:** Feedback for City of Claremont

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

You have received this feedback from Nick Parra [REDACTED] for the following page:

<https://www.ci.claremont.ca.us/Home/Components/Calendar/Event/5955/20?backlist=%2f>

To: City of Claremont Planning Commission: Please secure our safety by passing an effective nuisance hotel ordinance like Long Beach. Thank you. Nick Parra Wheeler Park Resident